OVER →

EPA HWCB

RCRIS NOTIFICATION DATA DISCREPANCY FORM

U.S. EPA REGION II
99 JUL 13 AM 11:51
PROGRAMS BRANCH

Information from RCRIS

Facility Name: Vanguard Diversified, Inc.
Facility EPA ID Number: NYD 002 414 753
Facility Address: 10 Java Street
City: Brooklyn St: N.Y. Zip: 11222
Mailing Address:
City: St: Zip:
Facility Contact: William Rohe Phone: (718) 383-2500
Owner/Operator:
SIC Code(s):
Waste Codes:
Generator Status (LQG/SQG) LQG
Other:

New Information (make change to "E" record only)

Facility Name:
Facility EPA ID Number:
Facility Address:
City: St: Zip:
Mailing Address:
City: St: Zip:
Facility Contact: Phone: - -
Owner/Operator:
SIC Code(s):
Waste Codes:
Generator Status (LQG/SQG)
Other:

In response to this request, please modify RCRIS Handler Notification Data for the following:

General Generator Information:

	Facility Name		EPA ID Number
	Facility Address		Mailing Address
	Facility Contact		Phone
	SIC Code(s)		Waste Code(s)
	Other		

Contact: M. Emil Phone:

Effective Date of Change: ASAP

Add/Change Generator Status Codes:

C	#	
	1	conditionally exempt Small Quantity Generator
	2	Definitionally Excluded Wastes
	3	Delisted Wastes
	4	One-time Hazardous Waste Generator
	5	Periodic Hazardous Waste Generator

C	#	
	6	No longer Generates HW; Still in Business
X	7	No longer Generates HW; Out of Business
	8	Never Generated Hazardous Waste
	9	ID Number to Transport Non-Hazardous Waste
	10	Regulated Under Another ID Number(s) (list below)

7-12-99
Date

change was already done ??? 7/12/99

Vanguard BUSINESS FURNITURE
DIVISION OF VANGUARD DIVERSIFIED INC.
10 JAVA STREET
BROOKLYN, N.Y. 11222
212/383-2500

300K Response

May 18, 1983

MAY 23 12 10 PM '83
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Mr. Ernest A. Regna, Chief
Solid Waste Branch
Air and Waste Management Division
U.S. Environmental Protection Agency,
Region II
26 Federal Plaza
New York, N. Y. 10278

gH
Thomas
6/17/83

Dear Mr. Regna:

E0302

Re: EPA.ID.NYD002414753

The following is a brief outline of steps being taken to correct violations noted in your letter of April 26, 1983.

file

1. "Hazardous Waste" labels have been ordered. Label has all necessary information as well as space for dating the use of the waste.

2. Space for storing waste drums will be protected by a fence of either chain or railing connected to posts.

3. Written as well as oral instructions are being given to all paint department personnel as to handling and documentation of waste storage.

4. A contingency plan including arrangements with Local Police, Fire and Hospital is being formulated for any emergency pertaining to these wastes.

5. The List of Names, addresses, and phone numbers of emergency coordinators as well as listing of equipment and location, is also being made. This information will be posted along with our usual safety notices applying to evacuation during emergency situations.

continued ...

If you require further information, please contact me directly.

Very truly yours,

VANGUARD BUSINESS FURNITURE

William Rohe

WILLIAM ROHE
Chief Engineer

cc: Richard A. Baker
Chief, Permits Administration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New YOrk,N.Y. 10278

cc: James Reid
Regional Solid Waste Engineer, Region 2
New York State Department of Environmental Conservation
2 World Trade Center
61st Floor
New YOrk, New York 10047

APR 26 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Rohe
Chief Engineer
Vanguard Diversified, Inc.
10 Java Street
Brooklyn, NY 11002

Re: EPA Identification Number: NYD002414753
Facility Location: Same
Inspection Date: September 13, 1982
20 GW4 10101

Dear Mr. Rohe:

The Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Resource Conservation and Recovery Act (RCRA) and its associated regulations: Title 40 of the Code of Federal Regulations (40 CFR) Parts 260-267, and 270-271.

By notification you informed EPA that you conduct activities involving hazardous waste subject to RCRA at the above referenced facility. In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA. This inspection revealed that the following regulatory violations existed at the time of the inspection:

1. 40 CFR §262.34(a) allows a generator to accumulate hazardous waste in containers and tanks for a period of no more than 90 days provided the accumulation conforms to certain regulations. At the time of the inspection, it was revealed that your facility did not meet the requirements of:

* 40 CFR §262.34(a)(2) which requires the date upon which each period of accumulation begins to be clearly marked and visible for inspection on each container. You were therefore in violation of 40 CFR §262.34(a)(2).

* 40 CFR §262.34(a)(3) which requires each container or tank accumulating hazardous waste to be marked or labeled clearly with the words, "Hazardous Waste." You were therefore in violation of 40 CFR §262.34(a)(3).

* 40 CFR §262.34(a)(4) which requires a generator to comply with the requirements in 40 CFR 265 Subpart C (Preparedness and Prevention) and 40 CFR 265 Subpart D (Contingency Plan and Emergency Procedures) and with §265.16 (Personnel Training). You were therefore in violation of 40 CFR §262.34(a)(4).

It is requested that, within thirty (30) days of your receipt of this letter, you send a letter to this office outlining the remedial actions taken or to be taken to correct these deficiencies. Also, you should be aware that these violations have resulted in your facility being designated as a high priority site for reinspection during 1983.

Please address response to:

Ernest A. Regna
Chief, Solid Waste Branch
Air and Waste Management Division
U. S. Environmental Protection Agency, Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Richard A. Baker
Chief, Permits Administration Branch
U. S. Environmental Protection Agency, Region II
26 Federal Plaza
New York, NY 10278

and

James Reid
Regional Solid Waste Engineer, Region 2
New York State Department of Environmental Conservation
2 World Trade Center
51st Floor
New York, NY 10047

You must include your EPA identification number on all correspondence.

Your failure to respond to this letter may cause this matter to be forwarded to our attorneys for further enforcement action.

Should you have questions about this Notice or should you wish to discuss this matter further, please contact Janet DeBiasio of my staff at (212) 264-1828. A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regna
Chief
Solid Waste Branch

Enclosure

cc: David Mafrici, Chief,
Bureau of Hazardous Waste Operations, NYSDEC, w/o encl.

James Reid
Regional Solid Waste Engineer, Region 2, NYSDEC, w/o encl.

bcc: Janet DeBiasio, 2AWM-SW w/encl.
Richard A. Baker, 2PM-PA

47-15-75(7/82)

24

2

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☒ ← checked by OSKeiden

Copy of report sent to the facility ☐

PERMITS ADMIN. BRANCH
REGION II
OCT 15 10 56 AM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Facility Information

Name: Vansumd. Diversified Inc.

Address: 10 Java Street
Brooklyn, NY

EPA ID#: NYD002414753

Date of Inspection: 9/15/82, Sept. 15, 1982.

Participating Personnel

State or EPA Personnel: Anna R. Saracco, Senior Engineering Technicia
NYSDEC, Region 2

Facility Personnel: Bill Rohe
Chief Engineer

Report Prepared by Name: Anna Saracco

Agency: NYSDEC, Region 2

Telephone #: 212-488-3862

Approved for the Director by: James Reid

Summary of Findings

Facility Description and Operations

This company manufactures office furniture. The operation consists of cutting the metal, and putting the pieces together, cleaning and then painting the parts. The painting is done by spraying with use of spray guns and with a machine.

The waste is generated from cleaning out the spray guns and lines that lead to ~~the~~ ~~xx~~ painting machines. (See page B for details).

A smaller quantity of sludge is generated from cleaning of their cleaning tanks. (See page B for details). This waste has not been analyzed.

Both wastes are picked up by Techtronics of Brooklyn. The wastes are not recyclable according to the gentlemen Mr. Rohe speaks with from Techtronics.

The floor + walls in the room where the spray painting is done is lined with paper. This is also true ~~of~~ ~~where~~ the paint machine area. This paper is removed periodically and put in with their garbage and given to their ~~municipal~~ private refuse collector.

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

They have two paint booths that are fed by lines that carry the paint. They also have spray guns that spray paint onto the furniture parts. These lines are cleaned out with a solvent that is called Solvesso 100 or Solvesso 150, by Esso. The resultant mixture is largely solvent & some paint. The mixture is hazardous due to flammability. They are not sure what is in the solvent.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

Continued from Above.

They generate about 40-50 drums/month of this waste. They also have a 3 stage washing system that washes the parts before they are painted. The 1st bath uses a chemical called Magnabound SW202, which contains acid phosphate salts. & is manufactured by Magnus Chemical, 255 Blair Road, Avenel, N.J. The sludge from this bath is cleaned twice a year & is shipped with their other waste. They get 2-4 drums with each cleaning.

Hazardous Waste on site - 3 drums of the solvent and paint mixture. D001

Is there reason to believe that the facility has hazardous waste on-site?

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

- [x] Company admits that its waste is hazardous during the inspection.
- [x] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- [ ] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- [ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- [ ] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- [ ] Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- [ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

N/A.

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	___	___	___
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long? _____10 days or less _____more than 10 days (complete TSD form)	___	___	___
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	___	___	___
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	___	___	___
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	___	___	___
o Transporter's name, EPA I.D. number, signature and date of signature	___	___	___
o TSDF's name, address and EPA I.D. Number	___	___	___
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	___	___	___
o Manifest Document number	___	___	___
o Proper DOT shipping description	___	___	___
o Quantity & type of containers	___	___	___
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	___	___	___
262.22 - Have records been kept since November 19, 1980?	___	___	___
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	___	___	___
If yes, was the incident report submitted to DOT? (obtain copy of the report)	___	___	___
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	___	___	___

General Comments:

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste)		✓	
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary			
All waste are basically the same	✓		
Company treats all waste as hazardous			
3) Is there a written waste analysis plan at the facility?		✓	
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.			
b) Test methods used to test these parameters.			
c) Sampling methods to obtain a representative sample of the waste to be analyzed.			
d) Frequency of repeated analysis to ensure accurate and current information.			
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.		✓	
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?			✓
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of this facility?	✓		
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?		✓	
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?			
3) Does the owner/operator record inspections in a log?			
4) Is there evidence that problems reported in the inspection log have been remedied?			
If no, please explain.			

265.16 - Personnel Training See page 5 last page.

	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?			
If yes, have facility personnel taken part in an annual review of training?			
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?			
—type and amount of training to be given to personnel in jobs related to hazardous waste management?			
—actual training or experience received by personnel?			
3) Are training records kept on all employees for at least 3 years?			

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

	YES	NO	N/A
1) Are there ignitable, reactive or incompatible waste on site?	✓		
If yes, what are the approximate types and quantities and location of the waste. 3 drums, waste solvent + paint mixture.			
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	✓		
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	✓		
— damage the structural integrity of the device or facility containing the waste?	✓		
— threaten human health or the environment?	✓		

See last pg, pg. 5

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	—	—	—
— a telephone or other device to summon emergency assistance from local authorities?	—	—	—
— portable fire equipment?	—	—	—
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	—	—	—
265.33 Is equipment tested and maintained?	—	—	—
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	—	—	—
265.35 Adequate aisle space?	—	—	—
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	—	—	—

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

See last pg., pg. 5.

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	—	—	—
1) Does the plan describe arrangements made with the local authorities?	—	—	—
2) Has the contingency plan been submitted to the local authorities?	—	—	—
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	—	—	—
4) Does the plan have a list of what emergency equipment is available?	—	—	—
5) Is there a provision for evacuating facility personnel?	—	—	—
6) Was there an emergency coordinator present or on call at the time of the inspection?	—	—	—

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?	—	✓	—
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?	—	—	✓
If not, please explain.			

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)	See pg. 1 of Generator Inspection Sheet.		
4) Does each manifest have the following information? (circle missing information)			
— a manifest document number?	—	—	—
— the generators name, mailing address, telephone number and EPA I.D. #?	—	—	—
— the transporters name and EPA I.D. Number?	—	—	—
— the TSD name, address, telephone number & EPA I.D. Number?	—	—	—
— a description of the waste (DOT)?	—	—	—
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded: into or onto the transport vehicle?	—	—	—
— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	—	—	—
(Obtain a copy of the incomplete manifests)	—	—	—

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?	—	✓	—
Describe unreconciled descrepancies.			

265.73 - Operating Record

1) Does the facility keep an operating record?	—	✓	—
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?	—	—	—
b) The location and quantity of each hazardous waste at each location?	—	—	—
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?	—	—	—
d) Summary reports and details of all incidents that require implementing the contingency plan.			
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?	—	—	—
f) Monitoring, testing or analytical data where required for:			
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?	—	—	—

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?	—	✓	—
If yes, has the facility submitted an unmanifested waste report?	—	—	—

40 CFR 265 Subpart F - Groundwater Monitoring

	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?		✓	
If yes, please explain			

265.112 - Closure Plan

Does the facility have a written closure plan? (Applies to all types of TSD facilities)		✓	
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?			
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?			
3. A description of the steps necessary to decontaminate facility equipment during closure?			
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?			
5. Does the owner/operator have a written estimate of of the cost of closing the facility?			
If yes, what is it? ($)			

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? (Applies only to disposal facilities)			
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($)			

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
Container - pg 6	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other_____
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). 3 drums, 55 gallons, containing the waste solvent & paint mixture.			
2) - Is there a containment system for spills, leaks and precipitation? If yes, describe.		✓	
265.171 - Do the containers appear to be in good condition, not in danger of leaking? If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.	✓		
265.172 - Are hazardous waste stored in containers made of compatible materials? If not, please explain.	✓		
265.173(a) - Are all containers closed except those in use?	✓		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	✓		
265.174 - Is the storage area inspected at least weekly?	✓		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		
265.177 - Are incompatible wastes stored separate from each other? If no, explain			✓

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

	YES	NO	N/A
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?		✓	
Is the waste hazardous?	✓		
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		

40 CFR 262 Subpart B-The Manifest

	YES	NO	N/A
Has hazardous waste been shipped off-site since November 19, 1980?	✓		

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. 11 shipments, 39 drums usually of waste solvent + paints

12/5/80 - 36 drums Bedford Trucking

1/23/81 - 25 drums

4/8/81 - 37 drums

6/18/81 - 30 drums

3/9/82 - 39 drums

3/18/82 - 39 drums

3/22/82 - 8 drums

4/17/82 - 39 drums

8/27/82 - 39 drums

8/27/82 - 39 drums.

8/31/82 - 20 drums.

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

	YES	NO	N/A
— a manifest document number?	✓		
— the generators name, mailing address, telephone number and EPA I.D. Number?	✓		
— the transporters name and EPA I.D. Number?			
— the name, address and EPA ID Number of the designated facility?	✓		
— a description of the wastes (DOT)? Shipped as D001, Waste Flammable liquid, NOS -	✓		
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	✓		
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	✓		

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

	YES	NO	N/A
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	✓		
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?	✓		
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

	YES	NO	N/A
40 CFR 262 - Subpart C - Pretransportation Requirements			
262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:			
1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179)			
2) Label each package according to DOT (i.e., 49 CFR 172)			
3) Mark each package according to DOT (i.e., 49 CFR 172)			
4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA." and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304)			
262.34 Accumulation Time			
1) How is waste accumulated on-site?			
[X] Containers			
[ ] Tanks			
[ ] Surface impoundments (complete SWMF checklist)			
[ ] Piles (complete SWMF checklist)			
2) Is waste accumulated for more than 90 days?			
If yes, complete SWMF checklist			
3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?		✓	
4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?		✓	

From the manifest dates it appears that they have stored for more than 90 days. However, Mr. Bill Rohe says they will be storing for less than 90 days in the future.

See note in left hand margin

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers

YES NO N/A

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).

3, 55 gallon drums with waste solvent + paint

265.171 - Do the containers appear to be in good condition, not in danger of leaking? ✓ _ _

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

265.172 - Are hazardous waste stored in containers made of compatible materials? ✓ _ _

If not, please explain.

265.173(a) - Are all containers closed except those in use? ✓ _ _

265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? ✓ _ _

265.174 - Is the storage area inspected at least weekly? ✓ _ _

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line? ✓ _ _

265.177 - Are incompatible wasts stored separate from each other? ~~✓~~ _ ✓

Drums are stored outside, where cars are parked. The storage area is too small.

N/A

	YES	NO	N/A
40 CFR 265 Subpart J - Tanks			
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	✓		
If yes, have facility personnel taken part in an annual review of training?			
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?		✓	
—type and amount of training to be given to personnel in jobs related to hazardous waste management?		✓	
—actual training or experience received by personnel?		✓	
3) Are training records kept on all employees for at least 3 years?		✓	

Foreman is instructed what to do.

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	✓		
— a telephone or other device to summon emergency assistance from local authorities?	✓		
— portable fire equipment?	✓		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	✓		
265.33 Is equipment tested and maintained?	✓		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
265.35 Adequate aisle space?	✓		
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.			

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

	YES	NO	N/A
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?		✓	
1) Does the plan describe arrangements made with the local authorities?		✓	
2) Has the contingency plan been submitted to the local authorities?		✓	
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?		✓	
4) Does the plan have a list of what emergency equipment is available?		✓	
5) Is there a provision for evacuating facility personnel?		✓	
6) Was there an emergency coordinator present or on call at the time of the inspection?		✓	

ADT + AFA notify him if emergency.

Have safety meeting + discuss what to happen in case of emergency. Minutes of meeting Did not see these.

200X4

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ •NYD002414753

VANGUARD DIVERSIFIED INC
10 JAVA ST
BROOKLYN NY 11222

INSTALLATION ADDRESS ➤ 10 JAVA ST
BROOKLYN NY 11222

EPA Form 8700-12B (4-80) 11/07/80

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	NYD002414753
I. NAME OF INSTALLATION	VANGUARD DIVERSIFIED INC
II. INSTALLATION MAILING ADDRESS	10 JAVA ST BROOKLYN, NY 11222
III. LOCATION OF INSTALLATION	10 JAVA ST BROOKLYN, NY 11222

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: S F NYD002414753 T/A 3 C 1

APPROVED:

DATE RECEIVED (yr., mo., & day): 800818

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: C 3

CITY OR TOWN: C 4 ST. ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: C 5

CITY OR TOWN: C 6 ST. ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: C 2 ROHE WILLIAM CHIEF ENGINEER

PHONE NO. *(area code & no.)*: 212-383-2500

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: C 8 CARL BAUM

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON–FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: NYD002414753

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY														
S	N	Y	D	0	0	2	4	1	4	7	5	3	T/A 2	C 1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F017	F001	F003	F005		
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K078					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U002	U019	U031	U112	U140	U154
37	38	39	40	41	42
U159	U161	U220	U239		
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

DETACH

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
William C. Rohe	WILLIAM C. ROHE CH. ENG	8/18/80

DETACH