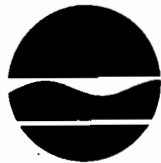


Region: I



# INSPECTION FORM

72

CESQG (Cat. 1) \_\_\_\_\_  
 SQG (Cat. 2) \_\_\_\_\_  
 SQG (Cat. 3) \_\_\_\_\_  
 GENERATOR (Cat. 4) \_\_\_\_\_  
 TSDF \_\_\_\_\_  
 OTHER \_\_\_\_\_  
 UNANNOUNCED \_\_\_\_\_  
 ANNOUNCED \_\_\_\_\_

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT  
 (Chapter 639, Laws of 1978)

Prepared for: Commissioner  
 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Send to: NYSDEC  
 Division of Hazardous Substances Regulation  
 Compliance Inspection Section  
 50 Wolf Road - Room 436  
 Albany, New York 12233-7253

EPA I.D. NUMBER: NYD002036564

COMPANY NAME (Corporate): Pass & Seymour / Slater  
 (Division): \_\_\_\_\_

COMPANY MAILING ADDRESS: 45 Sea Cliff Ave

City & State: Glen Cove, NY Zip Code 11542

COMPANY LOCATION ADDRESS: \_\_\_\_\_  
 (if different than mailing) \_\_\_\_\_

City & State: \_\_\_\_\_, NY Zip Code \_\_\_\_\_

COMPANY TELEPHONE NUMBER: (516) 671-7000 Extension \_\_\_\_\_

FULL NAME OF COMPANY CONTACT: George Koppelt

TITLE OF COMPANY CONTACT: supervisor

INSPECTION DATE: 1/6/95 TIME OF INSPECTION: \_\_\_\_\_ (a.m.) \_\_\_\_\_ (p.m.)

INSPECTOR'S NAME: J. Gene

NAME: and my

REPORT PREPARED BY: [Signature] DATE: \_\_\_\_\_

REPORT APPROVED BY: [Signature] DATE: 1/11/95



## TABLE OF CONTENTS

	<u>Page No.</u>	
Part I	<u>General Information and Classification of Facility</u>	
	1. Identification of Hazardous Waste	I-1
	2. Exemptions	I-2
	3. Hazardous Waste Generation/Treatment/Storage/Disposal	I-4
	4. Status Identification	I-7
Part II	<u>Comments, Conclusions and Recommendations</u> (Not for release to company, protected information)	II-1
	<u>Generator, TSDF and Transporter Requirements</u>	
	(Circle and attach Parts III through VIII and Appendices A through S as applicable)	
Part III	Category 1 - Conditionally Exempt Small Quantity Generator	III-1
Part IV	Category 2 - Small Quantity Generator	IV-1
Part V	Category 3 - Generator Subject to Reduced Requirements	V-1
Part VI	Category 4 - Large Quantity Generator	VI-1
Part VII	Interim Status Treatment, Storage and Disposal Facility	VII-1
Part VIII	Transporter Terminal	VIII-1

## APPENDICES

Appendix A	Land Disposal Restrictions - Generator	
Appendix B	Land Disposal Restrictions - TSDF	
Appendix C	Permitted Facility Inspection	
Appendix D	Consent Order Follow-up Inspection	
Appendix E	Requirements for Tanks	
Appendix F	Elementary Neutralization Units/Wastewater Treatment Units	
Appendix G	Requirements for Specific Hazardous Wastes	
Appendix H	Closure/Post Closure Inspection	
Appendix I	Waste Piles	
Appendix J	Surface Impoundments	
Appendix K	Incinerators and Energy Recovery Facilities	
Appendix L	Secure Landburial Facilities	
Appendix M	Thermal Treatment	
Appendix N	Chemical, Physical and Biological Treatment	
Appendix O	Underground Injection	
Appendix P	Land Treatment	
Appendix Q	Groundwater Monitoring	
Appendix R	Toxicity Characteristic ("TC") Inspection Checklist	
Appendix S	Waste Reduction Checklist	



Part I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 Yes    No

A. Facility generates and/or stores hazardous waste on-site.    

(1)  Company filed a RCRA hazardous waste notification and/or Part A of RCRA permit application.

(2)  Company has used knowledge of the hazardous characteristic of the waste to determine if it is hazardous.

(3)  Testing has shown characteristics of:

- Ignitability (D001) - 371.3(b)
- Corrosivity (D002) - 371.3(c)
- Reactivity (D003) - 371.3(d)
- EP Toxicity (D004 - 017) - 371.3(e)
- TCLP (D018 - D043) - 40 CFR 261.24

(4)  The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).

(5)  The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).

(6)  The material is listed in the regulations as an acute hazardous waste (P-Waste). 371.4(d)(5).

(7)  The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).

(8)  The material is listed in the regulations as a waste containing PCBs (B-Waste). 371.4(e).

B. The company notified EPA as a:

\_\_\_\_\_ *5/9/3*

Has EPA or DEC officially modified the company's status? Yes  No   
If yes, attach correspondence.

\_\_\_\_\_

C. If the facility is a treatment, storage or disposal facility, have they:

\_\_\_ Submitted a Part A application.

\_\_\_ Should the Part A be modified by the Company? If so, explain.

\_\_\_ Submitted a Part 373 permit application.

\_\_\_ Been granted a Part B permit.\* expiration date: \_\_\_\_\_

\_\_\_ Been granted a Part 373 permit or operating under SAPA with a Part 360 permit.\* expiration date: \_\_\_\_\_

\*Complete Appendix C - indicate compliance status with permit conditions.

D. \_\_\_ Is the facility operating under a consent order?\*

\_\_\_ Have they signed a consent order to resolve violations found during a previous inspection?\*

\*\*Complete Appendix D and indicate compliance with each condition of the order.

## 2. Exemptions

### A. Generator Exemptions

(1) \_\_\_ Not a regulated handler because:

(a) \_\_\_ Never generated any hazardous waste.

(b) \_\_\_ No hazardous waste generated within the last 3 years.

(c) \_\_\_ Company moved in \_\_\_\_\_ to \_\_\_\_\_.  
(date) (location)

(d) \_\_\_ Company out-of-business.

(e) \_\_\_ Company sold to \_\_\_\_\_.  
(new owner)

(2) \_\_\_ Samples collected for testing - 372.1(e)(5).

(3) \_\_\_ Residues of hazardous waste in empty containers - 372.1(e)(6).

(4) \_\_\_ A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment,

or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials - 372.1(e)(7).

## B. TSD Exemptions

- (1) — The storage of the following hazardous wastes is exempt from permitting provided that Part 374 of this Title is complied with - 373-1.1(d)(1)(vii):
- (a) — hazardous wastes that are recycled in a manner constituting disposal;
  - (b) — hazardous waste burned for energy recovery in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of the Part. [This exemption is not available if the hazardous waste stream has individual hazardous waste components with little or no heat value (less than 8,000 BTU/lb)];
  - (c) — used oil that exhibits one or more of the characteristics of hazardous waste and is burned for energy recovery in boilers and furnaces not regulated under 373-2.15 or 373-3.15;
  - (d) — hazardous waste from which precious metals (as defined in section 374.6 of this Title) are being reclaimed; and
  - (e) — spent lead acid batteries that are being reclaimed by battery crackers or secondary lead smelters.
- (2) — The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 372.4(b) (use of manifest system), and 372.4(d)(1) (manifest discrepancies) are complied with. (Storage of hazardous waste prior to recycling is not exempt under this subparagraph.) In addition: 373-1.1(d)(1)(viii):
- (a) This exemption is available to:
    - (1) — Commercial facilities that reclaim precious metals, as defined in 374.6 of this Title;
    - (2) — Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.
  - (b) This exemption is not available to:
    - (1) — Commercial facilities that recycle listed hazardous wastes received from off-site or burn these wastes for energy recovery;
    - (2) — Boilers and industrial furnaces that burn hazardous wastes for energy recovery, if any individual hazardous waste component has a heating value of less than 8,000 BTU/lb;

- (3)  Any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.
- (3)  Totally enclosed treatment facility - 373-1.1(d)(1)(xi).
- (4)  Elementary neutralization units or wastewater treatment units other than units located at commercial facilities. Units utilized only to neutralize or treat hazardous waste from recycling characteristic hazardous wastes or from precious metal recovery at commercial facilities are exempt. Complete Appendix F. 373-1.1(d)(1)(xii).
- (5)  Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks - 373-1.1(d)(1)(iii).
- (6)  Storage of liquid hazardous waste over the designated sole source aquifers provided the waste is stored less than 90 days and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks - 373-1.1(d)(1)(iv).
- (7)  The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) - 373-1.1(d)(1)(ix).
- (8)  Storage and treatment of hazardous waste on-site by generators that generate less than 100 kilograms and store less than 1,000 kilograms of hazardous waste in any calendar month. This exemption also applies to acute hazardous waste if generated in quantities less than those listed in Part 373-1.1(d)(1)(i)(b) - 373-1.1(d)(1)(v).
- (9)  Accumulation areas. Complete Item 2. of Part IV, V or VI - 373-1.1(d)(1)(xiv).
- (10)  Storage of manifested shipments of hazardous waste in containers or vehicles by a transporter at its own transfer facility for 5 days or less. Complete Part VIII - 373-1.1(d)(1)(xv).

### 3. Hazardous Waste Generation/Treatment/Storage/Disposal

- A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. [Do not include hazardous waste treatment processes.]

*Use of electrical switches etc.*  
*Waste from tool cleaning (sophia)*  
*Waste from degreasing part washing*  
*rags.*



B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or non-exempt). Include process diagrams if available.

Tool (dep) cleaning - naphtha  
mixture

C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size container or tanks used and their location in the storage area. (Be as specific as possible.)

(1) Accumulation Areas:

None

(2) Container Storage Areas for Cat. 1-4 generators\*

None at present

(3) Tank Storage Areas for Cat. 1-4 generators\*

- \* Cat. 1 and 2 generator - unlimited storage time providing quantity limits not exceeded.
- Cat. 3 generator - 180 days (or 270 if TSD is over 200 miles away).
- Cat. 4 generator - 90 days or less storage time.

**(4) Interim Status/Permitted Storage Areas for containers:**

---

---

---

---

---

**(5) Interim Status/Permitted Storage Areas for tanks:**

---

---

---

---

---

**(6) Any other treatment, storage or disposal units such as lagoons, surface impoundments, landfills, waste piles, incinerators, energy recovery units, or underground injection units:**

---

---

---

---

---

---

---

---

---

---

---

4. Status Identification:

A. Generator Status

- (1)  Category 1 - Conditionally Exempt Generator - generates less than 100 kg/mo and stores less than 100 kg. Complete Part III - 372.1(e)(1)(vii).
- (2)  Category 2 - Small Quantity Generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. Complete Part IV - 372.2(a)(8)(vi).
- (3)  Category 3 - Generator Subject to Reduced Requirements - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg - Complete Part V.- 372.2(a)(8)(iii).
- (4)  Category 4 - Generator - generates and/or stores 1,000 kilograms or more per month or generates acute hazardous waste in quantities greater than 1 kg per month. Complete Part VI. (Generators over sole source aquifers also complete Part VII.)

B. Treatment, Storage or Disposal Facility (TSDF)

- (1) Hazardous waste is generated and stored on-site.
  - (a) Yes\*  No  Is hazardous waste stored on-site longer than 90 days? 373-1.1(d)(1)(iii)
  - (b) Yes\*  No  Is more than 8,800 gallons of hazardous waste stored in containers? 373-1.1(d)(1)(iii)(b)
  - (c) Yes\*  No  Is more than 20,000 gallons of hazardous waste stored in tanks? 373-1.1(d)(1)(iii)(b)
- 2. Yes\*  No  Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored.
- 3. Yes\*  No  Hazardous waste is treated on-site in non-exempt units.
- 4. Yes\*  No  Hazardous waste is disposed of on-site.

\* (If yes, complete Part VII and/or appropriate Appendices to this report. (Do not complete Part VII for generators only that have exceeded 90 days or quantity limits.)

C. Transporter Status

Yes  No  Hazardous waste is transported by this company.

If Yes, Complete Part VIII

Permit No. \_\_\_\_\_



# FOIL EXEMPT

NOT FOR RELEASE TO COMPANY, PROTECTED INFORMATION

## Part II

### Comments, Conclusions and Recommendations Section

Facility Name Kass & Seymour  
EPA I.D. No. NY 002036564  
Date of Inspection \_\_\_\_\_

General Comments and Conclusions (list violations and give a short description of each violation providing enough information to prove that a violation has occurred.)

Last 6 months company changed from solvent to water based washes and became sq.g. Violations: No risk spec. 373-3.3 (f) No arrangements w. fire + police + hospital. 373-3.3 (g) (They used to be up to reg recently a cat. 4 generator so a closure plan should be important. Company is moving to N. Carolina in ~1 year.)

Also name + phone No. of coordinator  
372.2 (a) 8, 11(e) 21

# FOIL EXEMPT

EPA I.D. No. MD002036564

Insp. Date. 1/6/95

NOT FOR RELEASE TO COMPANY, PROTECTED INFORMATION

---

---

---

---

---

**Recommendations**

- No violations found. Thank you letter should be issued.
- A warning letter should be issued.
- A strong warning letter should be issued.
- A complaint should be issued and a fine levied.
- Other (please explain)\*

---

---

---

---

---

---

---

---

---

---

\*Do not refer cases directly to the BECI unit. All BECI referrals will be made by the Central Office.

Part V

CATEGORY 3 - Generator Subject to Reduced Requirements

Indicate:

X Violations

Indicate:

X Satisfactory  
NA Not Applicable

Category 3 - The generator who generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous waste and stores less than 1,000 kg has complied with the following:

1. General Requirements

- (a)  The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2). X
- (b)  The generator has obtained an EPA identification number - 372.2(a)(3). X
- (c)  Before transporting or offering hazardous waste\* for transportation off-site the generator has packaged the waste in accordance with the applicable USDOT regulations - 372.2(a)(4). NA
- (d)  Before transporting or offering hazardous waste\* for transportation off-site the generator has labeled each package of waste in accordance with the applicable USDOT regulations - 372.2(a)(5). —
- (e)  Before transporting or offering hazardous waste for\* transportation off-site the generator has marked each container or package of waste properly - 372.2(a)(6). —

\* Note: This does not apply to drums in storage.

- (f)  The quantity of non-acute hazardous waste accumulated on-site never exceeds 1000 kg. - 372.2(a)(8)(iii)(a). X
- (g)  Waste may be stored for up to 180 days unless the disposal facility is 200 miles or more away. Storage up to 270 days then is allowed - 372.2(a)(8)(iv). X
- (h)  At all times there must be at least one employee on-site or on call with the responsibility for coordinating emergency measures - 372.2(a)(8)(iii)(e)(1). X
- (i)  The name and phone number of the emergency coordinator must be posted next to the telephone - 372.2(a)(8)(iii)(e)(2)(i). —
- (j)  The location of fire extinguishers and spill control material and, if present, fire alarm must be posted next to the telephone - 372.2(a)(8)(iii)(e)(2)(ii). X

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

- (k)  The telephone number of the fire department must be posted next to the phone unless the facility has a direct alarm - 372.2(a)(8)(iii)(e)(2)(iii). X
- (l)  The generator has ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures - 372.2(a)(8)(iii)(e)(3). X
- (m)  The emergency coordinator or a designee have responded appropriately to any emergencies that have arisen - 372.2(a)(8)(iii)(e)(4). X

2. Accumulation Area Requirements

- (a)  The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). None at present
- (b)  Hazardous waste is stored in containers made of compatible materials - 373-3.9(c).
- (c)  All containers except those in use are closed - 373-3.9(d)(1).
- (d)  Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2).
- (e)  Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2).
- (f)  Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at or near the point of generation provided that Section 372.2(a)(8)(iii) requirements are met within 3 days, and the container holding the excess accumulation is marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b).

3. Container Storage Requirements

- (a)  The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container - 372.2(a)(8)(iii)(d), 373-1.1(d)(1)(iii)(c)(2). None at present
- (b)  Each container is marked with the words "Hazardous Waste" and with other words to identify the contents - 372.2(a)(8)(iii)(b), 373.9(d)(3).
- (c)  The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition, contents



Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b).

(d)  Hazardous waste is stored in containers made of compatible materials - 373-3.9(c).  
(If not, please explain.)

(e)  All containers except those in use are closed - 373-3.9(d)(1).

(f)  Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2).

(g)  The containers and storage area are inspected at least weekly - 373-3.9(e).

(h)  The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g):

(1)  Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2):

(a)  the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i);

(b)  production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii);

(c)  production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii);

(d)  damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(e)  a threat to human health or the environment - 373-3.2(h)(2)(v).

(2)  Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3).

4. Tank Storage Requirements

(a) Schedule for Secondary Containment

In order to prevent the release of hazardous waste or hazardous constituents to the environment, secondary containment that meets the requirements of 373-3.10(d) must be provided:

(1)  for all new tank systems or components, for which construction was started after July 14, 1986 prior to being put into service [Complete Appendix E, Items 6 and 7, pgs. E-7 through E-11]- 373-3.10(d)(1)(i);

(2)  for existing small quantity generator tank systems of known and documented age by January 12, 1989, or when the tank systems have reached 15 years of age, whichever comes later [Complete Appendix E, Items 6 and 7, pgs E-7 through E-11] - 373-3.10(d)(1)(iii); or

(3)  for existing small quantity generator tank systems for which the age cannot be documented-by January 12, 1995; if the age of the facility is greater than seven (7) years, then secondary containment must be provided by the time the facility reaches 15 years of age or by January 12, 1989, whichever comes later [Complete Appendix E, Items 6 and 7, pgs E-7 through E-11] - 373-3.10(d)(1)(iv).

(b) Schedule for assessment of a tank system's integrity

(1)  For tank systems that do not have secondary containment meeting the requirements of 373-3.10(d), the owner or operator has obtained a written assessment reviewed and certified by an independent, registered Professional Engineer that the tank system is not leaking or unfit for use:

(a)  for existing tank systems owned and operated by small quantity generators-by January 12, 1988 [Complete Appendix E, Item 4, pgs. E-3 and E-4] - 373-3.10(b)(3)(ii); and

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(b) \_\_\_ for all new tank systems or components, for which \_\_\_  
construction was started after July 14, 1986 -  
prior to being put into service [Complete  
Appendix E, Item 5, pgs E-4 through E-7] -  
373-3.10(c).

(2) \_\_\_ Owners or operators of existing tank systems that \_\_\_  
have secondary containment meeting the requirements  
of 373-3.10(d), must conduct this assessment by  
January 31, 1994 [Complete Appendix E, Item 6,  
pgs E-7 through E-10] - 373-3.10(b)(3)(iv).

(c) Response to leaks or spills and disposition of leaking or unfit-  
for-use tank systems

\_\_\_ A tank system or secondary containment system from which there has  
been a leak or spill, or which is unfit-for-use, has been removed  
from service immediately [Complete Appendix E, Item 10, pgs E-13  
through E-15] - 373-3.10(g).

(d) General operating requirements

(1) \_\_\_ Hazardous wastes or treatment reagents must not be \_\_\_  
placed in a tank if they could cause the tank or  
its inner liner to fail - 373-3.10(1)(2)(ii).

(2) \_\_\_ Uncovered tanks must be operated to ensure at least \_\_\_  
60 centimeters (2 feet) of freeboard, unless there  
is adequate containment - 373-3.10(1)(2)(iii).

(3) \_\_\_ Where hazardous waste is continuously fed into a \_\_\_  
tank, the tank must be equipped with a means to  
stop this inflow - 373-3.10(1)(2)(iv).

(4) \_\_\_ The owner or operator must mark all tanks with the \_\_\_  
words "Hazardous Waste" and with other words that  
identify the contents of the tanks. For underground  
tanks, the markings must be placed on a sign in the  
area above the tank - 373-3.10(1)(2)(v).

(e) Tank(s) are inspected each operating day for:

(1) \_\_\_ discharge control equipment (e.g. waste feed cutoff \_\_\_  
systems, bypass systems and drainage systems) -  
373-3.10(1)(3)(i).

(2) \_\_\_ monitoring equipment (e.g. pressure and temperature \_\_\_  
gauges) - 373-3.10(1)(3)(ii).

(3) \_\_\_ level of waste in tank to ensure proper freeboard - \_\_\_  
373-3.10(1)(3)(iii).

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(f) Tank(s) are inspected weekly for:

- (1)  corrosion or leaking of fixtures or seams - 373-3.10(1)(3)(iv).
- (2)  erosion or obvious signs of leakage (e.g. wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g. dikes) - 373-3.10(1)(3)(v).

(g) Tank closure

- (1)  At closure, all hazardous waste must be removed from tanks, discharge control equipment and discharge confinement structures - 373-3.10(1)(4).

(h) Special tank requirements for ignitable or reactive waste

- (1)  Ignitable or reactive waste is placed in a tank and the waste is stored, treated, rendered or mixed before or immediately after placement in the tank so that the resulting waste, mixture or dissolution of material is no longer ignitable or reactive - 373-3.10(1)(5)(i)(a)(1); and
- (2)  The treatment, storage or disposal of ignitable or reactive waste in a tank is conducted so that it does not - 373-3.10(1)(5)(i)(a)(2):
- (a)  generate extreme heat or pressure, fire or explosions violent reactions - 373-3.2(h)(2)(i);
- (b)  produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii);
- (c)  produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion - 373-3.2(h)(2)(iii);
- (d)  damage the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or
- (e)  through other like means threaten human health or the environment - 373-3.2(h)(2)(v); or
- (3)  The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react - 373-3.10(1)(5)(i)(b); or
- (4)  The tank is used solely for emergencies - 373-3.10(1)(5)(i)(c).

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(5)  The storage of ignitable or reactive waste in covered tanks complies with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 thru 2-6 of the "Flammable and Combustible Liquids Codes." [See Appendix E, page E-18 for Tables.] - 373-3.10(i)(5)(ii).

(i) Special Tank Requirements for Incompatible Wastes

(1)  Incompatible wastes, or incompatible wastes and materials, are not placed in the same tank and hazardous waste is not placed in an unwashed tank which previously held an incompatible waste or material unless the mixture or commingling is conducted to prevent the following - 373-3.10(e)(6):

(a)  generation of extreme heat or pressure, fire or explosions, or violent reactions;

(b)  production of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;

(c)  production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

(d)  damage to the structural integrity of the device or facility containing the waste; or

(e)  through other like means threaten human health or the environment.

5. Manifest, Reporting and Recordkeeping Requirements

(a)  Hazardous waste is shipped off-site with an accompanying manifest - 372.2(b)(5)(i).

If "violation" is checked, please elaborate.

\_\_\_\_\_  
\_\_\_\_\_

(b) List the frequency of shipments and the amount of waste per shipment.

\_\_\_\_\_ ~2 d/m \_\_\_\_\_

(c)  The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii).

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

List transporter and permit number.

CPC NYD 062785429

- (d)  The generator offers for shipment or ships hazardous waste to an authorized facility. - 372.2(b)(5)(iii). X
- If violation, list names of any unauthorized facilities.
- 
- 

- (e)  Each manifest is completed in accordance with the instructions found in Appendix 30 of Part 372 - 372.2(b)(1). [Indicate items in violation]

	Generator	Trans 1	Trans 2	TSDf	
(1) Name of	X	X	—	X	X
(2) EPA ID No. of	X	X	—	X	X
(3) Mailing Address of	X			X	X
(4) Telephone No. of	X	X	—	X	X
(5) Manifest Document #					X
(6) The proper USDOT description.					X
(7) The appropriate: <u>X</u> quantity, <u>X</u> container number, container type, and <u>X</u> waste type by units of weight or volume.					X
(8) Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC.					X

- (f)  The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: X

If not, exception reports have been submitted covering these shipments - 372.2(c)(3). MD

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(g)  The generator must distribute copies of the manifest as specified on the manifest form - 372.2(b)(3). X

(h)  For international shipments the generator has done the following - 372.2(b)(4)(i): NA

(1)  The EPA and the Department have been notified 60 days prior to shipment of the hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(c)(1).    

(2)  Delivery of the wastes has been confirmed by the consignee within 90 days of acceptance by initial transporter - 372.5(e)(2).    

(3)  Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(f)(1).    

(i)  The generator has complied with the requirements of Section 372.6 for interstate shipments - 372.2(b)(4)(ii).    

(j)  The generator has complied with the requirements for shipping by rail or water (bulk) found in Section 372.7 - 372.2(b)(4)(iii).    

(k)  The requirements of this section (Manifest Requirements) do not apply to hazardous waste produced by generators of less than 1,000 kg/m who do not store 1,000 kg or more provided the following conditions are met - 372.2(b)(7): NA

(1)  The waste is reclaimed under a contractual agreement pursuant to which - 372.2(b)(7)(i):    

(a)  the type of waste and frequency of shipments are specified in the agreement - 372.2(b)(7)(i)(a);    

(b)  the vehicle used for transporting the waste and delivering regenerated material back to the generator is owned and operated by the reclaimer - 372.2(b)(7)(i)(b); and    

(c)  the reclaimer complies with Part 364 - 372.2(b)(7)(i)(c).    

(2)  The generator records the following information for each shipment - 372.2(b)(7)(ii):    

(a)  the hazardous waste code and quantity of waste shipped - 372.2(b)(7)(ii)(a); and

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

(b) \_\_\_ the date the waste is shipped - 372.2(b)(7)(ii)(b). \_\_\_\_\_

(3) \_\_\_ The generator maintains a copy of the reclamation agreement for at least three years after termination or expiration of the agreement - 372.2(b)(7)(iii). \_\_\_\_\_

(l) \_\_\_ A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i). X

(m) \_\_\_ A copy of each Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). NA

(n) \_\_\_ A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). X

(o) \_\_\_ All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X

(p) \_\_\_ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X

(q) \_\_\_ There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii). X

6. Preparedness and Prevention - 373-3.3

(a) \_\_\_ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). X

(b) \_\_\_ The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c): X

(1) \_\_\_ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1); X



Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

- (2)  A device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire teams - 373-3.3(c)(2); X
- (3)  Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and X
- (4)  Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems - 373-3.3(c)(4). X
- (c)  Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). A
- (d)  Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device - 373-3.3(e). X
- (e)  The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency unless aisle space is not needed for any of these purposes - 373-3.3(f). —
- (f)  The facility owner or operator has attempted to make the following arrangements as appropriate with local authorities for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1): —
  - (1)  Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility - 373-3.3(g)(1)(i); —
  - (2)  Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority - 373-3.3(g)(1)(ii); 167
  - (3)  Agreements with State emergency response teams, emergency response contractors, and equipment suppliers - 373-3.3(g)(1)(iii); and —

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

- (4) X Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility - 373-3.3(g)(1)(iv).
- (g)      Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record - 373-3.3(g)(2). NA

Company Name Pass & Seymour  
EPA ID# No. NY D 0 0 2 0 3 6 5 6 4  
Region/Inspector I A. Jera  
Inspection Date 1/6/95

**APPENDIX A**  
**Land Disposal Restrictions**

(For small quantity generators, generators and TSD's that are also generators)

**I. Applicability**

- A. The hazardous wastes restricted from land disposal are:
  - 1. The hazardous wastes listed or identified in Part 371 or 376.
  - 2. The wastes identified as hazardous based on characteristic alone (D001-D017).
- B. Hazardous waste generated by conditionally exempt small quantity generators are not subject to any provisions of Part 376.

**II. Waste Identification**

- A. List the hazardous wastes generated by the company.  
(List by waste code)
  - F002 - 5
  - D001
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_
  - \_\_\_\_\_

**B. Waste Specific Prohibitions\* (Formerly National Capacity Variances)**

\* Case-by-case extensions may be granted to individual facilities for these wastes after expiration of capacity variances.

1. Does the company generate any waste subject to a waste specific prohibition?     \_\_\_ Yes X No
2. If yes, identify the waste. \_\_\_\_\_
- \_\_\_\_\_

**III. Dilution Prohibited as a Substitute for Treatment**

- |   | YES | NO       |
|---|-----|----------|
| A. Other than as described in B. below, has the generator, in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c)(1). | ___ | <u>X</u> |
| 1. As a substitute for adequate treatment to achieve compliance with section 376.4.   | ___ | ___      |
| 2. To otherwise avoid a prohibition in section 376.3.   | ___ | ___      |
| 3. To circumvent a land disposal prohibition imposed by Article 27.   | ___ | <u>T</u> |
- If yes to 1, 2, or 3 above, identify the waste and provide a brief description of the dilution process.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

- |   | YES | NO       |
|---|-----|----------|
| B. Does the generator dilute characteristic hazardous wastes (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to SPDES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(c) (Five Letter Technology codes).] | ___ | <u>X</u> |

**IV. Case-by-Case Extensions**

- |  | YES | NO       |
|--|-----|----------|
| Does the company generate any wastes subject to a case-by-case extension to an effective date? - 376.1(e). | ___ | <u>X</u> |

Identify the waste(s) subject to the extension.

---

---

V. Petitions to Allow Land Disposal

YES NO

Has the company applied for or been granted an exemption from a prohibition of the land disposal of a restricted hazardous waste in a particular unit(s) by the Commissioner? - 376.1(f).

— X

Identify the wastes subject to exemption.

---

---

VI. Waste Analysis and Recordkeeping - 376.1(g)

A. Determination of Wastes Restricted from Land Disposal.

1.     Except as specified in 376.3(b) or 376.4(d) generator has determined if his listed wastes are restricted from land disposal - 376.1(g)(1).

X

The determination is based on:

- a.     Testing of the wastes or extracts of the wastes using the test method described in Appendix 35 (TCLP), or
- b.     Using knowledge of the wastes

X

—

2.     Except as specified in 376.3(b), the generator has determined if his wastes exhibiting one or more characteristics (D001-D017) are restricted from land disposal - 376.1(g)(1).

X

The determinaton is based on:

- a.     Testing of extracts using the test method described in Appendix 20 (EP-tox), or
- b.     Using knowledge of the wastes.

X

—

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

**B. Restricted Wastes not Meeting Treatment Standards.**

- For restricted wastes that do not meet the applicable treatment standards set forth in 376.4 or that exceed the prohibition levels in 376.3(b), the generator has notified the treatment or storage facility in writing. The notice must contain the following information: - 376.1(g)(1)(i). X
- 1.  EPA Hazardous Waste Number - 376.1(g)(1)(i)(a). X
- 2.  For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(i)(b). X
- 3.  For all other restricted wastes not included in 2. above: X
  - a.  The treatment standard, or
  - b.  A reference on the notification that, includes: X
    - (1)  The applicable wastewater or nonwastewater category. X
    - (2)  The applicable waste specific criteria within a waste code. X
    - (3)  The section(s) and paragraph(s) where the applicable treatment standard appears. X
- 4.  For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(i)(b). X
- 5.  The manifest number of the shipment - 376.1(g)(1)(i)(c). X
- 6.  Waste analysis data, where available - 376.1(g)(1)(i)(d). X

**C. Restricted Wastes Meeting Treatment Standards.**

NA

- For restricted wastes that can be land disposed of without further treatment, the generator has submitted a notice and a certification to the treatment, storage, or disposal facility stating that the waste meets the applicable treatment standards and prohibition levels - 376.1(g)(1)(ii).

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

- 1.  The notice includes the following information:

  - a.  EPA Hazardous Waste Number - 376.1(g)(1)(ii)(a)(1).
  - b.  For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(ii)(a)(2).
  - c.  For all other restricted wastes not included in b. above: - 376.1(g)(1)(ii)(a)(2).

    - (1)  The treatment standard, or
    - (2)  A reference on the notification that includes.

      - (a)  The applicable wastewater or nonwastewater category.
      - (b)  The applicable waste specific criteria within a waste code.
      - (c)  The section(s) and paragraph(s) where the applicable treatment standard appears.

  - d.  For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(ii)(a)(2).
  - e.  The manifest number for the shipment - 376.1(g)(1)(ii)(a)(3).
  - f.  Waste analysis data where available - 376.1(g)(1)(ii)(a)(4).

- 2.  The certification is signed by an authorized representative and makes the required statement - 376.1(g)(1)(ii)(b).

D. Wastes Exempted from Land Disposal Prohibitions. *NA*

- 1.  For wastes exempted from land disposal prohibitions such as case-by-case extensions, exemptions under 376.1(f), or nationwide capacity variances, with each shipment the generator has submitted a notice to the facility receiving the waste stating that the waste is not prohibited from land disposal - 376.1(g)(1)(iii).

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

- 2.  The notice includes the following information.

  - a.  EPA Hazardous Waste number - 376.1(g)(1)(iii)(a).
  - b.  For wastes F001-F005, F039, and wastes prohibited in 376.3(b), the corresponding treatment standards - 376.1(g)(1)(iii)(b).
  - c.  For all other restricted wastes not included in b. above: - 376.1(g)(1)(iii)(b).

    - (1)  The treatment standard, or
    - (2)  A reference, including:

      - (a)  The applicable wastewater or nonwastewater category.
      - (b)  The applicable waste specific criteria within a waste code.
      - (c)  The section(s) and paragraph(s) where the applicable treatment standard appears.
      - (d)  For treatment standards expressed as specified technologies, the applicable five-letter treatment code - 376.1(g)(1)(iii)(b).
      - (e)  The manifest number of the shipment - 376.1(g)(1)(iii)(c).
      - (f)  Waste analysis date, where available - 376.1(g)(1)(iii)(d).
      - (g)  The date the waste is subject to the prohibitions - 376.1(g)(1)(iii)(e).

E. Treatment of Prohibited Wastes in Containers or Tanks. *NA*

For generators managing a prohibited waste in tanks or containers regulated under Part 373-1 and treating that waste in those tanks or containers to meet applicable treatment standards the generator has:

- 1.  Developed and followed written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards - 376.1(g)(1)(iv).



Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

- 2.  Kept the plan on-site in the generator's records - 376.1(g)(1)(iv).
- 3.  The following requirements have been met: 
  - a.  The waste analysis plan has been based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contains all information necessary to treat the waste(s), including the selected testing frequency - 376.1(g)(1)(iv)(a).
  - b.  The plan has been filed with the Commissioner to implement Part 376 requirements a minimum of 30 days prior to the treatment activity with delivery verified - 376.1(g)(1)(iv)(b).
  - c.  Wastes shipped off-site have complied with the notification requirements for restricted wastes meeting treatment standards - 376.1(g)(1)(iv)(c). [Complete Item VI.C., pgs. A-4 and A-5.]

F. Recordkeeping.

- 1.  If a generator has determined whether a waste is restricted based solely on knowledge of the waste, all supporting data used to make this determination has been retained on-site in the generator's files - 376.1(g)(1)(v).
- 2.  If a generator has determined whether a waste is restricted based on testing of the waste or an extract developed using the test method described in Appendix 35 (TCLP), all waste analysis data has been retained on-site in the generator's files - 376.1(g)(1)(v).
- 3.  If a generator has determined that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste, or exempt from regulation, under 371, subsequent to the point of generation, the generator has placed in the facility's file a one-time notice stating: - 376.1(g)(1)(vi).  1112

  - a.  That the waste is generated,
  - b.  That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation, and

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

c.  The disposition of the waste.

4.  Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date that the wastes were last sent to on-site or off-site treatment, storage, or disposal. This requirement applies to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste, or exempted from regulation, subsequent to the point of generation - 376.1(g)(1)(vii).

G. Alternate Treatment Standards for Lab Packs. *NA*

1.  For generators managing lab packs containing wastes identified in Appendix 38 (organometallics), who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(viii).

a.  Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item VI.B., page A-4]

b.  Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items VI.F.1-3., pgs. A-7 through A-8.]

c.  Submitted the certification provided in 376.1(g)(1)(viii), signed by an authorized representative.

2.  For generators managing lab packs containing organic wastes specified in Appendix 39, who wish to use the alternate treatment standards, with each shipment the generator has: - 376.1(g)(1)(ix).

a.  Submitted a notice to the treatment facility in accordance with 376.1(g)(1)(i). [Complete Item VI.B., page A-4]

b.  Made a waste determination in compliance with 376.1(g)(1)(v) & (vi). [Complete Items VI.F.1-3., page A-7 through A-8.]

c.  Submitted the certification provided in 376.1(g)(1)(ix), signed by an authorized representative.

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

H. Small Quantity Generators with Tolling Agreements. NA

- \_\_\_ For generators of less than 1,000 kg per calendar month and who do not store 1,000 kg or more at any time: 376.1(g)(1)(x) \_\_\_
1. \_\_\_ The waste is reclaimed under a contractual agreement - 372.2(b)(7)(i). \_\_\_
  2. \_\_\_ For the initial shipment of such wastes, the generator has complied with the notification and certification requirements that apply for the wastes subject to the tolling agreement - 376.1(g)(1)(x). [Complete Items VI.B, C, or D, pgs A-4 through A-6, as applicable, except for manifest requirements.] \_\_\_
  3. \_\_\_ Small quantity generators must retain on-site a copy of the initial notification and certification, together with the tolling agreement, for at least three years after termination or expiration of the agreement - 376.1(g)(1)(x). \_\_\_

VII. Special Rules Regarding Wastes That Exhibit a Characteristic

- A. \_\_\_ The generator has determined each waste code applicable to the waste in order to determine the applicable treatment standard under section 376.4. For the purposes of Part 376, the waste must carry the code for a listed waste and also any characteristic code if the waste also exhibits that characteristic, except as specified below in Item B - 376.1(h)(1). X
- B. \_\_\_ For a prohibited waste that is listed and also exhibits a characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic code, provided the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise the waste must meet the treatment standards for all applicable listed and characteristic codes - 376.1(h)(2). MA
- C. \_\_\_ Prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). \_\_\_

Indicate

Indicate

X Violations

X Satisfactory  
NA Not Applicable

D. \_\_\_ For characteristic hazardous wastes that have been treated \_\_\_  
and are no longer hazardous, the initial generator has  
shipped the wastes to a Part 360 facility and sent the  
notification and certification to the Commissioner\* -  
376.1(h)(4).

\* Notification is not required to be sent to the Part 360 facility.

- 1. \_\_\_ The notification includes the following information: - 376.1(h)(4)(i). \_\_\_
  - a. \_\_\_ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). \_\_\_
  - b. \_\_\_ A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s), the applicable wastewater or nonwastewater category, and the subdivisions made within each waste code based on waste-specific criteria - 376.1(h)(4)(i)(b). \_\_\_
  - c. \_\_\_ The treatment standards applicable to the waste at the initial point of generation - 376.1(h)(4)(i)(c). \_\_\_
- 2. \_\_\_ The certification is signed by an authorized representative and includes the language found in 376.1(g)(2)(v)(a) - 376.1(h)(4)(ii). \_\_\_

VIII. Prohibitions on Land Disposal

A. Solvent/Dioxin Wastes. - 376.3(a)

1. Does the company generate any of the solvent wastes  YES \_\_\_ NO  
F001-F005 or any dioxin wastes F020-F023 and  
F026-F028 that are prohibited from land disposal?

(If yes, complete Item 2.)

2. These wastes may be land disposed provided that:  
376.3(a)(1)

- a. The wastes meet the applicable treatment standards - 376.3(a)(1)(i). \_\_\_ YES  NO
- b. The company has been granted an exemption from a prohibition pursuant to a petition under 376.1(f) with respect to those wastes covered by the petition - 376.3(a)(1)(ii). \_\_\_ YES \_\_\_ NO

*no landfilling*

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

- c. The company has been granted an extension to the effective date of a prohibition - 376.3(a)(1)(iii).  YES  NO

**B. Prohibited Wastes - 376.3(b)(1).**

1. Does the company generate any of the following wastes? (If yes, answer Items 2 through 4 below.)

- a. Liquid hazardous wastes containing PCB's at concentrations of equal to or greater than 50 ppm - 376.3(b)(1)(i).  YES  NO
- b. Hazardous wastes containing halogenated organic compounds (HOCs) in concentrations greater than or equal to 1,000 ppm, that are identified as hazardous by a property that does not involve HOCs - 376.3(b)(1)(ii).  YES  NO
- c. Liquid hazardous wastes that contain over 134 mg/l nickel and/or 130 mg/l of thallium - 376.3(b)(1)(iii).  YES  NO

2. These wastes may be land disposed provided that: 376.3(b)(2).

- a. Persons have been granted an exemption from a prohibitions, or - 376.3(b)(2)(i).  YES  NO
- b. Persons have been granted an extension to the effective date of a prohibition, or - 376.3(b)(2)(ii).  YES  NO
- c. They meet the applicable treatment standards, or are in compliance with all prohibitions set forth in Part 376 or RCRA section 3004(d) - 376.3(b)(2)(iii).  YES  NO

3.  The wastes found in 1.(a)-(c) above have been subjected to the Paint Filter Liquids Test to determine if they are liquids - 376.3(b)(3).

4.  The initial generator of a liquid hazardous waste containing PCBs or a liquid or nonliquid hazardous waste containing HOCs has tested the waste (not an extract or filtrate) or used knowledge of the waste to determine if the waste equals or exceeds the specified prohibition levels (50 ppm for PCBs, 1,000 ppm for HOCs) - 376.3(b)(4).

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

C. Prohibited Waste Found in 376.3(c) [First, Second, and Third Third Wastes].

1.  The initial generator has tested a representative sample of the waste extract or the entire waste, depending on whether the treatment standards are expressed as concentration in the waste extract or the waste, or used knowledge of the waste to determine if it exceeds the applicable treatment standards - 376.3(c)(7).

D. Variance From a Treatment Standard. - 376.4(e) *NA*

1. Has the generator submitted a petition for a variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste cannot be treated to the specified level, or where the treatment technology is not appropriate to the waste?  YES  NO

If yes, complete Items (a) and (b) below.

- (a)  A generator that is managing a waste covered by a variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(6).
- (b)  During the petition review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(7).

2. Has the generator submitted a petition for a site-specific variance from a treatment standard where the treatment standard is expressed as a concentration in the waste or waste extract and the waste which is generated under conditions specific only to one cannot be treated to the specified level, or the treatment technology is not appropriate to the waste?  YES  NO

If yes, complete Items (a) and (b) below.

- (a)  The generator, treatment facility or disposal facility managing a waste covered by a site-specific variance from a treatment standard has complied with the waste analysis requirements for a restricted waste - 376.4(e)(11).
- (b)  During the application review process, the applicant has complied with all restrictions on land disposal - 376.4(e)(12).

Indicate

X Violations

Indicate

X Satisfactory  
NA Not Applicable

IX. Prohibition on Storage of Restricted Wastes\* -376.5(a)

- A.  The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). /
- 1.  The generator subject to reduced requirements (Category 3) has: X
  - a.  Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). X
  - b.  Complied with all storage requirements of 372, 373-1, and 373-3. [Complete Part V.] - 376.5(a)(1)(i). see p. V
  - c.  Stored all restricted wastes for 180/270 days or less - 376.5(a)(1)(i). X
- 2.  The generator has:
  - a.  Stored restricted waste in tanks or containers on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(i). —
  - b.  Complied with all storage requirements of 372, 373-1, 373-2, and 373-3. [Complete Part VI.] - 376.5(a)(1)(i). —
  - c.  Stored all restricted wastes for 90 days or less - 376.5(a)(1)(i). —

\* This requirement does not apply to Category 2 small quantity generators.





Company Name PCW & Seymour  
 EPA ID# No. NY D 0 0 2 0 3 6 5 6 4  
 Region/Inspector I A. Guin  
 Inspection Date 1/6/95

APPENDIX R

TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

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

Yes  No

If no this checklist need not be completed.

2. Was the facility's waste(s) considered hazardous prior to the promulgation of the new TC requirement?

Yes  No

If No, proceed to question number 3.

a) Does the generator determine and list on its manifests all of it's waste(s) TC characteristics?

Yes  No

Comments \_\_\_\_\_  
 \_\_\_\_\_

b) 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)?

Yes  No

3. Is the waste properly managed as a hazardous waste?

Yes  No

If No, this is a high priority violation. Be sure to obtain a detailed description of the waste's 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 which has become hazardous as a result of the TC rule?

Yes  No

TABLE F-TC

# TC Constituents and Their Regulatory Levels

Newly Added Constituents		
Constituent	Regulatory Level (mg/l)	Regulatory Level (mg/l)
D018 Benzene*	0.5	0.13
D019 Carbon Tetrachloride*	0.5	0.5
D020 Chloroethane	0.03	3.0
D021 Chlorobenzene	100.0	200.0
D022 Chloroform	6.0	2.0
D023 O-Cresol	200.0	100.0**
D024 M-Cresol	200.0	5.0
D025 P-Cresol	200.0	0.7
D027, 1, 4-Dichlorobenzene*	7.5	0.5
D028, 1, 2-Dichloroethane*	0.5	400.0
D029, 1-Dichloroethylene*	0.7	2.0
D030, 2-Dichloroethylene*	0.13	0.2
D031 Heptachlor	0.008	200.0
EP Constituents (Being Retained at Current Levels)		
Constituent	Regulatory Level (mg/l)	Regulatory Level (mg/l)
D004 Arsenic*	5.0	5.0
D005 Barium*	100.0	0.02
D006 Cadmium*	1.0	0.4
D007 Chromium*	5.0	10.0
D008 Lead*	5.0	0.5
D009 Mercury*	0.2	10.0
D010 Selenium*	1.0	1.0
Newly Added Constituents		
Constituent	Regulatory Level (mg/l)	Regulatory Level (mg/l)
D032 Hexachlorobenzene	0.5	0.13
D033 Hexachloro-1, 3-Butadiene	0.5	0.5
D034 Hexachloroethane	0.03	3.0
D035 Methyl Ethyl Ketone	100.0	200.0
D036 Nitrobenzene	6.0	2.0
D037 Pentachlorophenol	200.0	100.0**
D038 Pyridine	200.0	5.0
D039 Tetrachloroethylene	200.0	0.7
D040 Trichloroethylene*	7.5	0.5
D041 2, 4, 5-Trichlorophenol	0.5	400.0
D042 2, 4, 6-Trichlorophenol	0.7	2.0
D043 Vinyl Chloride*	0.13	0.2
D026 Cresol	0.008	200.0

\* Regulated based on an MCL

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