



Verification	Originator	Approved	Issued
Initials	ADS	ST	ST
Date	8/15/2014	12/11/2014	12/15/2014

### TITLE: COFL-FF-ED-4.5.2-2 Compliance Evaluation

Facility Information	
Facility Name: <u>Fleet Fenceline</u>	Facility Representative: <u>TBD</u>
Address: <u>220 SW 14<sup>th</sup> Ave</u>	Title: <u>Program Manager</u>
City, State, Zip: <u>Fort Lauderdale, FL 33312</u>	Telephone: <u>954-828-5781</u>
Type of Facility: <u>Municipal Utilities and Fleet Compound</u>	Fax: _____

Compliance Evaluation Information	Facility Operations / Environmental Aspects
Date of Compliance Evaluation: _____	<input type="checkbox"/> Vehicle Fueling
Environmental Services Manager: _____	<input type="checkbox"/> Vehicle/Equipment Maintenance
Compliance Evaluation Team Leader: _____	<input type="checkbox"/> Vehicle Washing
Compliance Evaluation Team: _____	<input type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Hazardous Waste Generation
_____	<input type="checkbox"/> Waste Oil Generation
Persons Interviewed: _____	<input type="checkbox"/> Universal Waste Generation
_____	<input type="checkbox"/> Hazardous Materials Use/Storage
_____	<input type="checkbox"/> Solid Waste Accumulation
Inaccessible Areas: _____	<input type="checkbox"/> Natural Resources/wetlands waterways
_____	<input type="checkbox"/> USTs
General Comments: _____	<input type="checkbox"/> ASTs
_____	<input type="checkbox"/> Vehicle Storage
_____	<input type="checkbox"/> Other: _____

Regulatory Areas and Compliance Checklist			
Note: If a check mark is placed in a shaded box, a corrective action may be required (Corrective Action Request (CAR) on form <b>COFL-FF-EP 4.5.3-2</b> ).			
HAZARDOUS WASTE			
YES	NO	N/A	Verification of Generator Status: (310 CMR30.060 & 30.303)
			Has the facility registered as a Generator of Hazardous Waste and/or Waste Oil? Generator ID No:
			Facility Hazardous Waste Generator Status: <input type="checkbox"/> VSQG <input type="checkbox"/> SQG
			Facility Waste Oil Generator Status: <input type="checkbox"/> VSQG <input type="checkbox"/> SQG
			Is the registered generator status appropriate? (VSQG <100 kg/mo.; SQG <1,000 kg/mo. - review manifests)
			Have appropriate hazardous waste determinations been made for wastes generated at the facility?



YES	NO	N/A	<b>IF VSQG: (310 CMR 30.253 &amp; 30.353)</b>
			Are there less than three 55-gallon drums of hazardous waste/waste oil at the facility?
			<b>IF SQG: (310 CMR30.253 &amp; 30.351)</b>
			Are there less than ten 55-gallon drums of hazardous waste/waste oil at the facility?
			Is hazardous waste stored at the facility for less than 180 days from the accumulation start date?
			<b>IF DUAL STATUS</b> (e.g. VSQG of hazardous waste and SQG of waste oil):
			Are the quantities of hazardous waste and waste oil stored at the facility below the maximum allowed for each status? (e.g. < 3 drums of hazardous waste and < 10 drums of waste oil)

YES	NO	N/A	<b>Waste Container Management: (310 CMR 30.253; 30.351; 30.353)</b>
			Are hazardous waste containers in good condition? (Note any dents, rust, or damage)
			Are hazardous waste containers closed?
			Are hazardous waste containers labeled?
			Do the labels include the name of the waste (waste oil, waste paint, etc.)?
			Is the waste Hazard Type (toxic, ignitable, corrosive, and/or reactive) included on each label?
			If the facility is a Small Quantity Generator, is the date when accumulation began clearly included on the container label?
			Is the accumulation time within regulatory limits? (180-days SQG)
			Are containers compatible with the waste being accumulated?
			Are containers tightly closed (bungs sealed and bolt ring secured)?
			Are containers of hazardous waste stored in the designated accumulation area?

YES	NO	N/A	<b>Hazardous Waste Accumulation Areas: (310 CMR 30.253; 30.351; 30.353)</b>
			<b>If the facility maintains a designated Hazardous Waste Accumulation Area:</b>
			Is the accumulation area locked/secured to prevent unknowing entry?
			Is the waste storage area adequately demarcated? ( e.g., visible yellow line on floor and only HW stored therein)
			Is the accumulation area located indoors on a surface free of cracks and away from floor drains?
			Is the accumulation area labeled as "HAZARDOUS WASTE" with lettering at least 1-inch high?
			Is Emergency Information/Contact List posted at the accumulation area?
			Is emergency equipment (spill, fire, etc.) located at the accumulation areas?
			Is secondary containment in use where required/warranted?
			Is the accumulation area in good order (clean and neat, free of spills)?
			Does the area have adequate aisle space between drums to allow for inspections of the containers?
			<b>If the facility does NOT maintain a designated Hazardous Waste Accumulation Area:</b>
			Is hazardous waste self-transported to a designated facility on the day of generation or within 3 days of filling a Satellite Drum?



YES	NO	N/A	<b>Hazardous Waste Satellite Accumulation Areas: (310 CMR 30.253; 30.351; 30.353):</b>
			<b><i>If the facility maintains a Satellite Hazardous Waste Accumulation Area:</i></b>
			Is there only one drum/container for each waste type? (limit one container up to 55-gallons)
			Is the satellite accumulation area at or near the waste's point of generation?
			Is the satellite accumulation area managed by the person responsible for the area/operations generating the waste?
			Are container labels complete? (e.g. "Hazardous Waste," type of waste, & hazard associated with waste)
			Are wastes moved to the main accumulation area within 3 days after the satellite accumulation area container is filled?
			Are containers compatible with the waste?
			Are containers closed when not adding/removing waste?
			Is spill response equipment present, adequate, and easily accessible?
			Is secondary containment in use where required/warranted? (e.g., if located outside or near floor drains, etc.)

YES	NO	N/A	<b>Hazardous Waste Recordkeeping: (310 CMR 30.253; 30.351; 30.353)</b>
			<b><i>Hazardous Waste Generators:</i></b>
			Are weekly inspection records of the hazardous waste and satellite accumulation areas maintained?
			<b><i>If the facility is a VSQG and self-transport hazardous waste:</i></b>
			Is a receipt received from the destination facility and on file at the facility?
			<b><i>If the facility does NOT self-transport hazardous waste (VSQG, SQG):</i></b>
			Are hazardous waste manifests used when shipping hazardous wastes?
			Are manifest records maintained for three years?
			Has the facility received returned copies of manifests from receiving facilities and maintained for 3 years?
			Is the hazardous waste generator ID number properly written on each manifest?
			If the facility has not received a return copy of a manifest from the disposal facility in 45 days, has the facility filed an Exception Report and are these Exception Reports maintained for 3 years?
			Are copies of Land Ban Certifications completed and maintained for 3 years?
			Did the manifests reviewed demonstrate that the facility is appropriately disposing of waste to only licensed facilities via licensed transporters?
			<b><i>If SQG of Hazardous Waste or Waste Oil:</i></b>
			Has the facility made an attempt to notify the police department, fire department, local board of health, and emergency response teams as to the facility layout, the hazards associated with the wastes, location of the hazards, and possible emergency evacuation routes?
			Are employees trained as to their duties related to hazardous waste handling?

YES	NO	N/A	<b>Universal &amp; Special Waste: (310 CMR 30.1000)</b>
			<b><i>Universal Waste Batteries</i></b> (skip subsection if not generated)
			Are batteries stored indoors in a container suitable for containing possible leakage?
			Is battery container labeled with "Universal Waste – Batteries"
			Is battery container labeled with accumulation start date?
			Is the accumulation date less than one year old?



YES	NO	N/A	<b>Universal Waste Mercury Containing Lamps and/or Devices</b> (skip subsection if not generated)
			Are devices stored indoors in a container suitable for containing possible breakage?
			Is storage container labeled with "Universal Waste-Mercury Containing Devices" or "Universal Waste-Mercury Containing Lamps" for fluorescent bulbs?
			Are containers labeled with the start date of accumulation?
			Is the accumulation date less than one year old?
<b>Lead Acid Batteries: (40 CFR 266 Subpart G)</b>			
			Are used lead acid batteries appropriately containerized / stored and returned to the Stockroom?
<b>Gasoline &amp; Oil Filters</b>			
			Are oil/gasoline filters punctured and hot drained for 12 hours before disposal as a scrap metal or non hazardous waste?
			Does the facility mix gasoline filter drainage with its waste oil?

<b>HAZARDOUS MATERIALS</b>			
YES	NO	N/A	<b>Hazardous Materials Management: (454 CMR 21.00)</b>
			Are hazardous material containers labeled with the name of their contents?
			Are containers having capacities greater than 5 gallons labeled with an NFPA label?
			Are hazardous materials stored in a contained area?
			Are hazardous material containers closed when not in use?
			Are compressed gas cylinders labeled?

YES	NO	N/A	<b>Hazardous Materials Management: (454 CMR 21.00)</b>
			Are compressed gas cylinders capped?
			Are compressed gas cylinders stored in a secured cylinder storage rack?
			Does the facility maintain an active SDS file?
			Is the SDS file currently located in its designated location?
			Does the facility have a SDS on file for each product at the facility containing a hazardous material? (spot check SDS file for random products observed during the walkthrough)
			Has the facility submitted annual EPCRA Tier II Reports to the LEPC, SERC, and local Fire Department?





STORAGE TANKS		
YES	NO	N/A
<b>Storage Tank Management: (527 CMR 9.00)</b>		
<b><i>Aboveground Storage Tanks</i></b>		
		Is each tank clearly labeled with the name of its contents?
		Does each tank appear to be in good condition, free from leaks and corrosion?
		Does the facility conduct weekly visual inspections of each AST? (check by personnel interviews)
		Are Calcium Chloride ASTs locked or otherwise secured to prevent accidental discharge?
<b><i>Underground Storage Tanks: (527 CMR 9.00)</i></b>		
		Are the USTs equipped with secondary containment, spill and overflow protection, and leak detection?
		Are steel USTs/underground piping equipped with cathodic protection?
		Is the UST tank monitoring system functioning properly?
		Are electronic daily inventory checks conducted on Facility USTs?
		Are inventory/reconciliation records completed and kept at the Facility?
		Does a District representative monitor the electronic inventory checks?
		Are leak detection systems and cathodic protection systems tested and calibrated annually (records/logs kept for 3 years)?
<b><i>If the UST electronic system is inoperable:</i></b>		
		Does the facility conduct daily stick tests?
		Does the facility conduct daily water level tests?
		Does the facility submit testing records?
<b><i>If the Facility Dispenses Gasoline: (310 CMR 7.24)</i></b>		
		Is the gasoline dispensing operation equipped with a Stage II vapor recovery system?
		Is the Stage II system registered with DEP and tested annually (Annual In-Use Compliance Certification submittal)?
		Are records of Stage II system weekly inspections and periodic maintenance kept at the Facility?
<b><i>Tanks: (527 CMR 9.07)</i></b>		
		Have tanks been appropriately registered /permitted with the local fire department and the State Fire Marshal?
		Are tank registration/permit certificates posted in a prominent location?
<b><i>Spill Prevention: (40 CFR 112)</i></b>		
		Does the facility store oil in aboveground tanks or drums in quantities equal to or greater than 1,320 gallons?
		If Yes, does the facility have and up-to-date and P.E.-certified SPCC Plan?



WATER QUALITY			
YES	NO	N/A	Drinking Water Supply: (310 CMR 22.22)
			What is the Facility's water supply source? <input type="checkbox"/> Private Well <input type="checkbox"/> Municipal Public Water Supply <input type="checkbox"/> Other:
			Does the facility have backflow prevention devices for the boiler feedwater system?
			Does the facility have backflow prevention devices on its fire water/sprinkler system?
			Does the facility have backflow prevention devices on threaded hose connections?

YES	NO	N/A	Wastewater Discharge: (314 CMR 7.00; 360 CMR 10.00; 40 CFR 122)
			Does the facility have a wastewater discharge permit to a POTW or an NPDES permit for discharge to a surface water?
			If Yes, is the facility complying with the permit conditions?
			List Permits:
			Does the facility discharge un-permitted process wastewater?
			If Yes, describe discharge(s):

YES	NO	N/A	Drainage Systems: (310 CMR 1-15; 248 CMR 2.00; SOP 19)
			Where do floor drains discharge to: <input type="checkbox"/> POTW <input type="checkbox"/> Surface Water <input type="checkbox"/> Ground <input type="checkbox"/> Other, describe:
			Are floor drains clean and free of debris and stains?
			Does the facility have spill equipment to divert and contain spills from entering the floor drain system?
			If floor drains are located in an area of hazardous material storage or maintenance areas, do the drains discharge to a sanitary sewer (non-septic or non-stormwater system or to a holding tank)?
			If floor drains are located in an area of hazardous material storage and discharge to a municipal sewer system, has the facility notified the POTW of the industrial waste discharge?
			If floor drains have been sealed, did the facility file a WS-1 form with the state plumbing inspector?
			Are there any oil/water separators on-site?
			If yes, how many?
			If present, are oil/water separators inspected periodically?
			If present, when was the oil/water separator last inspected/serviced?



YES	NO	N/A	<b>Stormwater Discharges: (40 CFR 122; 314 CMR 3.00 &amp; 5.00; 310 CMR 27.00)</b>
			Does the Facility discharge stormwater via a "point source" (trench, ditch, storm drain, etc.) to a wetland, stream or surface water?
			If Yes and the Facility conducts equipment/vehicle maintenance and/or fueling, has the Facility submitted an NOI to register under Phase II of EPA's Stormwater Discharge Program?
			If Yes, has the Facility completed a Stormwater Pollution Prevention Plan (SWPPP)?
			If Yes, has the Facility implemented the SWPPP (BMPs, inspections, etc.)
			If applicable and the Facility has not submitted NOI/SWPPP, has the Facility submitted a No Exposure Certification to EPA?
			Are there stormwater catchbasins on the property?
			If Yes, Where do the catch basins discharge? <input type="checkbox"/> POTW <input type="checkbox"/> Surface Water <input type="checkbox"/> Ground <input type="checkbox"/> Other, describe:
			If present, have leaching catch basins been registered with the DEP (Class V Injection Well Registration or in NOI for EPA Phase II Stormwater Program)?
			If a leaching catch basin was registered with DEP, does the Facility maintain a map/plan showing the catch basin location?
			If present, are storm drains clean and free of excess sediments, debris, and stains?

YES	NO	N/A	<b>Preventative Measures:</b>
			Does the facility periodically inspect areas for equipment leakage?
			Are hazardous materials stored in areas protected from the elements?

YES	NO	N/A	<b>Vehicle Washing: (310 CMR 1-15; 40 CFR 12)</b>
<b><i>If facility is a Designated Vehicle Washing Facility:</i></b>			
			Are vehicles washed indoors?
			Is the facility equipped with floor drains connected to either the municipal sewer or wash water recycling system, or Is the facility equipped with an approved holding tank?
			Are contractors forbidden to wash vehicles at the facility?
<b><i>If facility is NOT a Designated Vehicle Washing Facility:</i></b>			
			Are vehicles washed offsite?
			Are vehicles only rinsed onsite (no detergents or heated water/steam)?
<b><i>If the facility has an Industrial Wastewater Holding Tank: (Existing Permits; 314 CMR 18.00)</i></b>			
			Does the facility have a DEP Industrial Wastewater Holding Tank Permit?
			If Yes, is the Facility in compliance with permit conditions?
			For applicable holding tanks, has the Facility submitted a one-time compliance certification to DEP (Due within 60 days for new tanks) (Not required if the Facility has a DEP-issued plan approval for the holding tank.)
			Does the Facility maintain copies of installation plans (until tank is decommissioned) and records on pumping and wastewater shipments/disposal (three years)?
			If an existing holding tank was not installed in accordance with PE Certified Plans, has the holding tank undergone an integrity assessment?
			Is the Holding Tank labeled as "Non-Hazardous Industrial Wastewater?" (required for underground and aboveground tanks)



			Is the Holding Tank equipped with a high level alarm?
			Is the holding tank gauged/inspected for leakage at least weekly? (required for new underground tanks)
			Is the alarm system tested by an electrician on a semi-annual basis?
			Is the holding tank pumped cleaned and inspected for structural integrity every five years?

NATURAL RESOURCE AREAS			
YES	NO	N/A	Wetlands, Buffer Zones, and Riverfront Zones: (310 CMR 9.00 & 10.00)
			Are there any Natural Resource Areas (wetland, buffer zone, or riverfront zone) at the property? (If NO, go to next section)
			Is the facility conducting work in a Natural Resource Area (e.g. removing, filling, dredging, or altering)?
			If the facility is conducting work in a Resource Area, was a Request for Determination of applicability, or NOI submitted to and approved by the local Conservation Commission?
			Does the facility unnecessarily store solid waste, equipment, or materials in a Natural Resource Area?
			If materials subject to erosion or wash out are stored in a Natural Resource Area due to lack of space, have proper erosion and sedimentation controls been put in place? (bales, silt fences, berms, tarps etc.)

POLLUTION PREVENTION			
YES	NO	N/A	Spills/Releases: (310 CMR 40.0000; 40 CFR 300; 40 CFR 355)
			Have there been any reportable releases of oil and/or hazardous materials at the facility since the last audit?
			If yes, describe event(s) and actions taken, including notifications made.

YES	NO	N/A	Asbestos: (310 CMR 7.09; 7.15; 453 CMR 6.00)
			Has the facility conducted any building renovations/demolitions or asbestos abatement projects?
			If yes, was an asbestos survey conducted prior to renovation/demolition?
			Prior to renovation/demolition, was DEP notified?
			If asbestos abatement was conducted, were licensed contractors used?

YES	NO	N/A	House & Grounds-keeping:
			Are equipment and material storage areas neat and orderly?



			Is there excessive staining, waste materials, or other evidence of improper practices?
			Is there excessive staining around fueling areas?



<b>AIR QUALITY</b>			
YES	NO	N/A	<b>Air Emissions, Permits &amp; Recordkeeping: (310 CMR 7.00)</b>
			Does any single heating unit at the facility have a heat input over 10 MMBtu/hr?
			If Yes, has the Facility obtained a Plan Approval permit from DEP?
			Do the heating units at the facility have a combined heat input over 10 MMBtu/hr?
			If Yes, has the facility submitted Source Registration emission statements to the DEP?
YES	NO	N/A	<b>Emergency Generators</b>
			Does the facility operate an Emergency Generator having a heat input (>3 MMBtu/hr)? (>10 MMBtu/hr = permit required)
			If yes, is a 12-month rolling log kept on the generator hours of operation to document permit exemption?
YES	NO	N/A	<b>Parts Cleaners</b>
			Is a solvent parts cleaner used?
			If yes, is the unit equipped with a drain to a remote reservoir?
			If present, is the unit equipped with a functioning cover?
			If present, is the unit cover kept closed when not in use and are instructions on the proper operation posted on the unit?
YES	NO	N/A	<b>Painting Operations</b>
			Is painting/coating performed on-site (other than minor architectural or touch up painting)?
			Does the facility maintain a 12-month rolling log to document coating rates and associated emissions?
			Does the equipment meet DEP standards? (HVLP, filters, stack, etc.)
YES	NO	N/A	<b>Noise &amp; Visible Emissions</b>
			Has the facility received any noise complaints, or is facility under any noise restrictions?
			If yes, describe:
			Do any facility operations have visible emissions?
			If Yes, describe:
YES	NO	N/A	<b>Refrigerant Management</b>
			Does the facility conduct vehicle or building refrigeration maintenance?
			If yes, are personnel who perform refrigerant work certified by EPA?
			Is refrigerant recovery equipment EPA-certified?
			Has the facility submitted a Notification Form with EPA for use of the refrigeration equipment?





### Hazardous Waste Stream Information

Waste Description and Code	Process Generating Waste	Average Generation Rate (note units)	Accumulation Area(s)	Types of Storage (drums, tanks, etc.)	Pick-Up Frequency



## Manifest

	State/Uniform Manifest No.				
<b>Manifest Date</b>					
<b>Generator Name/Address</b>					
<b>Generator EPA I.D.#</b>					
<b>Phone Number</b>					
<b>Transporter</b>					
<b>Transporter EPA I.D. #</b>					
<b>TSDF</b>					
<b>TSDF EPA I.D. #</b>					
<b>DOT Waste Description</b>					
<b>Waste Code(s)</b>					
<b>General Waste Description</b>					
<b>Quantity</b>					
<b>LDR Form</b>					
<b>Generator Cert.</b>					



Transporter Cert.					
TSDF Cert.					
Return Copy of Manifest					



### Solid Waste Disposal

Material (check if generated) <input checked="" type="checkbox"/>	Segregated and Recycled (Y/N)	Domestic Trash (Y/N)	Other* Disposal (Y/N)
Paper			
Cardboard			
Scrap Wood			
Wood Pallets			
Scrap Metal			
Plastic Scrap			
ABC Waste			
C & D Waste			
Glass			
Scrap Metal			
Industrial Rags			
Fluorescent Lamps			
Lighting Ballasts			
Air Filters			
Off-spec. products			
Waste Coolant			
Vehicle Batteries			
Other Batteries			
Waste Oil			
Waste Oil Filters			
Empty Drums			
Used Tires			
Other:			

\* "Other" disposal methods include but are not limited to solid waste landfilling and incineration

