



AFHENSIAN PRUTEKSION LINALA GUÅHAN

LOURDES A. LEON GUERRERO, GOVERNOR OF GUAM • JOSHUA F. TENORIO, LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO, ADMINISTRATOR

Mr. Chul Woo Park
Owner
SD Recycling Services
P.O. Box 27333
Barrigada, Guam 96921

JAN 22 2019

RECEIVED

SOON O. PARK
1-23-19

RE: Notice of Violation and Order of Compliance (NOV/OC) No. SW 19-001

Hafa Adai Mr. Park:

You are hereby advised that this **Notice of Violation and Order of Compliance (NOV/OC) No. SW19-001** is hereby issued to SD Recycling Services (hereinafter referred to as SD Recycling Services), located on Lots 5158-1-1 and 5158-R7 Harmon Industrial Park, in the municipality of Tamuning.

The Guam Environmental Protection Agency (Guam EPA) is charged with the responsibility of implementing the Solid Waste Management and Litter Control (SWMLC), Chapter 51 of Title 10, Guam Code Annotated (G.C.A.), and the Rules and Regulations for the Guam Environmental Protection Agency Solid Waste Disposal, Chapter 23 of Title 22, Guam Administrative Rules and Regulations (G.A.R.R).

This NOV/OC is based on the September 27, 2018, Compliance Evaluation Inspection (CEI) conducted at SD Recycling Services solid waste management facility. The inspection was conducted as a result of a scheduled CEI for permitted solid waste management facilities (SWMF).

Upon providing introductions and credentials to Ms. Beverly Park, Facility Manager, Guam EPA Representatives explained the purpose of the visit was to conduct a CEI to ensure permit conditions, facility layout and operations are in accordance with the SWMF **Storage & Processing Permit No. 17-054STO/PRO** issued to SD Recycling Services.

During the inspection Guam EPA representatives were accompanied by the Facility Manager and inspected the following areas: Record Keeping, Storage and Processing areas, Buffer zones, Perimeter, Signage, and Personnel Protective Equipment. The inspection revealed the following areas of noncompliance with the 10 GCA Chapter 51 and Title 22 G.A.R.R Chapter 23, §23104(e).

Title 22 G.A.R.R Chapter 23, §23104(e) Effect of the permit. The General and Special

Conditions of the permit become the standards and guide for the facility.

1. Record Keeping:

- Vector control records: Vector control plans were made available during this inspection but no records were kept.
- Emergency plans: Emergency plans are not being implemented.
- Major operational problems, complaint, or difficulties (MOPCDs): MOPCD record in place but not implemented;
- Dust and litter control records: Dust control plan in place but not implemented and no records maintained; and
- Self-Monitoring: Quarterly and Annual Self- Monitoring were not being conducted and or submitted.

2. Storage areas: Rooms 2 & 3 and Yard 1, 2, &3

- Processed Storage Area (PSA): PSA for nonferrous metals were not being utilized as indicated on the facility layout plan. Processed metals were stored outside the designated area;

3. Unprocessed and Processing Area:

- Unprocessed Storage Area Capacity (USAC): USAC exceeded and expanded outside permitted area;
- Authorized Waste: Improper storage and processing of junk vehicles; and
- Facility layout & operations in accordance w/ approved plans & specification: Operations was not following the approved facility layout plans and permit conditions.

4. Buffer zones areas:

- Buffer zone maintenance: Designated buffer zones around the scrap piles were not properly maintained;
- Buffer zones: Designated buffer zones around the process and unprocessed piles were blocked with debris; and
- Buffer zone layout not followed.

5. Perimeter:

- Boundary markers, benchmarks, horizontal control, vertical controls: Observed facility boundaries not being maintained and vertical control markers were not identified during inspection; and
- Onsite vegetation: No vegetation maintenance on easement and around the perimeter of the facility.

6. Signage:

- Signage: Signs did not have the required approved information
1. Permit Number and expiration date; and
- Warning Signs: Warning signs were not posted around the facility.

7. Personnel Protective Equipment:

- Employee identification cards: No employee identification cards were in use.

NOTICE OF VIOLATIONS

Based on the facts delineated, as well as those contained in the enclosed inspection

NOTICE OF VIOLATIONS

Based on the facts delineated, as well as those contained in the enclosed inspection report, SD Recycling Services is in violation of the following sections of the Chapter 51 of Title 10 GCA and Chapter 23 of Title 22 G.A.R.R. The deficiencies and regulatory provisions that have been violated are indicated below and are the basis for this **Notice of Violation and Order of Compliance**.

1. **Section 51110(a)(1)** states that "it shall be unlawful for any person to violate any provision of this Chapter or any rule, regulation, standard, or order issued pursuant to this Chapter".
 - **SD Recycling Services violated the provisions of this Chapter.**
2. **Section 51110(a)(5)** states that "it shall be unlawful for any person to store, collect, transport, process, or dispose of solid waste in such a manner as to degrade the environment, create a public nuisance, create a health or safety hazard, or violate any provisions of this Chapter".
 - **SD Recycling Services improperly stored and processed scrap metals and junk vehicles contrary to their permit conditions.**
3. **Section 51110(a)(9)** states that "it shall be unlawful for any person to Improperly manage or operate a solid waste management facility, or violate any provisions of this Chapter".
 - **SD Recycling Service did not follow the permit conditions: record keeping requirements facility layout, and operations as outlined in Title 22 G.A.R.R Chapter 23, §23104(e).**

ORDER OF COMPLIANCE

Based on the violations cited above, Guam EPA hereby requires **SD Recycling Services** to perform the following remedial measures within the time frames stated below, from the date of receipt of this Order:

1. Immediately cease accepting junk vehicles and other scrap metals into the facility until the facility no longer exceeds their storage capacity limit and complies with the permit conditions as outlined in their Storage & Processing Permit No.17-054STO/PRO.
2. Within seven (7) calendar days of receipt of this Notice of Violation and Order of Compliance, submit a facility compliance cleanup, and a schedule of excessive waste stream disposal plan and schedule for processing and removal of the junk vehicles. The disposal plan and compliance schedule shall be submitted to the Agency for review, modification and/or approval.

At minimum, the disposal plan and compliance schedule should include the following:

- a. Type of wastes;
 - b. Volume/quantity of wastes;
 - c. Location of disposal facility(ies);
 - d. Schedule of compliance (Timeframe in which compliance activities will be initiated and completed).
3. Within fifteen(15) calendar days upon the approval of the Disposal Plan, properly dispose all solid wastes and provide disposal receipts to Guam EPA confirming the final disposition of the excessive waste stream; and
 4. Confirm in writing, within seven (7) calendar days upon cleanup completion submit an affidavit that the above-referenced remedial measures have been taken, the date each was taken, including supporting documentation (disposal receipts and photos). If any of these objectives are not accomplished, additional administrative penalties may be assessed.

Guam EPA reserves the right to impose penalties for the violations listed above may be punishable by civil or criminal actions, including penalties of up to \$1,000.00 per day for each violation or noncompliance and imprisonment for a term of not more than one year or both as provided by 10 GCA, Chapter 51, §51115 (a) and (b).

NOTICE OF RIGHT TO APPEAL

You may file within fifteen (15) calendar days of the date of this Notice of Violation/Order of Compliance/Administrative Penalty Order, a Notice of Intent to Appeal also known as a Notice of Defense with the Guam EPA's Board of Directors, setting forth in such Notice of Intent to Appeal/Notice of Defense, a verified petition outlining the legal and factual bases for such an appeal. A form copy of the Notice of Intent to Appeal, also known as a Notice of Defense, is attached for your convenience.

Unless a written request for a hearing signed by or on behalf of the person, agency or business entity named above in this Notice of Violation/Order of Compliance/Administrative Penalty Order is made by delivering the enclosed form entitled "Notice of Intent to Appeal (a/k/a Notice of Defense)", or by delivering a notice of defense as provided in 5 G.C.A. Ch. 9, section 9205, to Guam EPA within fifteen (15) calendar days after the Notice of Violation/Order of Compliance/Administrative Penalty Order was personally served on you or mailed to you, Guam EPA may proceed upon the Notice of Violation/Order of Compliance/Administrative Penalty Order without a hearing.

The Notice of Intent to Appeal and verified petition, also known as a Notice of

Guam Environmental Protection Agency Board of Directors
c/o Administrator
Attn: Air & Land Division
Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue Tiyan
Barrigada, Guam 96913

Failure to file a Notice of Intent to Appeal within the period specified above will constitute a waiver of your right to a hearing. Without further notice to you, this Order of Compliance will become final and the Agency may proceed upon the Order without a hearing.

Guam EPA routinely provides copies of the inspection report to Government of Guam agencies, and posted the notices on the Guam EPA website for public information. If you believe that this report contains privileged or confidential information, you may make claim within fourteen (14) calendar days from the date of this letter. Guam EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

If you have any questions regarding the technical aspects of the inspection report or this letter, please contact the Solid Waste Management Program at 300-4751.

Sincerely,



WALTER S. LEON GUERRERO
Administrator

Enclosed: CEI Report
Notice of Intent to Appeal

cc: USEPA Region 9, Guam Program Manager
Attorney General of Guam



Guam Environmental Protection Agency
 17-3304 Mariner Ave.
 Barrigada, Guam 96913-1617



**NOTICE OF INTENT TO APPEAL
 (AKA NOTICE OF DEFENSE)**

I, _____, have received your Notice of Violation, Order of Compliance and/or Administrative Penalty Order dated _____, charging me for violations and/or imposing penalties and/or other orders, and I wish to:
 (Please check appropriate sections)

A. Request for a hearing and

- 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.
- 2. Object to the form of the accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.
- 3. Wish to prepare new matter in my defense.
- 4. Admit to the accusation in part.

B. Admit to the accusation in whole.

C. Verified Petition: Under penalty of perjury I hereby declare that the following constitutes my legal and factual basis for this appeal:

[please continue on blank sheet of paper if more space is needed and attach to this paper]

My mailing address is:

SIGNATURE

DATE



GUAM ENVIRONMENTAL PROTECTION AGENCY

AGENSIA PROTUKSION LINA'LA GUAHAN

EDDIE BAZA CALVO
GOVERNOR OF GUAM

RAY TENORIO
LT. GOVERNOR OF GUAM

P.O. BOX 22439 BARRIGADA, GU 96921

EPA.GUAM.GOV

SOLID WASTE MANAGEMENT PROGRAM

Compliance Evaluation Inspection Report

Purpose: Compliance Evaluation Inspection for Solid Waste Management Facilities

Date of Investigation: September 27, 2018

Facility Name: SD Recycling Services

Facility Permit Number: 17-054 STO/PRO

Site Location: Lot No. L5158-1-1 & L5158-R7, Harmon Industrial Park

Facility Owner: Chul Woo Park

Facility Representatives: Beverly Park

Alleged Violator:

Mailing Address: P.O. Box 27333, Barrigada, GU 96921

Contact Number: 633-7373 / 988-4000

GEPA Representative: Glenn San Nicolas/Laura Kanai/Maria Duenas

Phone: 300-4751

Report Date: September 27, 2018



Figure 1. Map –SD Recycling Services, Lot No. L5158-1-1 & L5158-R7, Harmon Industrial Park.

BACKGROUND

SD Recycling Services is a solid waste management facility, permitted to operate on Lot No. L5158-1-1 & L5158-R7, Harmon Industrial Park, in the municipality of Tamuning. The facility is permitted to store and process various solid wastes, primarily metallic (ferrous and non-ferrous) wastes, white goods, junk vehicles, and spent lead acid batteries under permit number 17-054 STO/PRO. Based on their Solid Waste Management Facility permit application, residual petroleum substances (i.e. used/waste oil and filters) and waste tires were disclosed as part of their processing activities. However, the facility is not permitted to accept used tires and waste/used oil.

INSPECTION & FINDINGS

On September 27, 2018, Guam EPA conducted a Solid Waste Management Facility Compliance Evaluation Inspection (SWMFCEI) as indicated below.

Guam EPA inspected various areas within the facility and observed the following:

1. Record Keeping:

- **§23104(e) Vector control records:** Vector control plans were made available during this inspection but no record of vector control preventive measures applied.
- **§23104(e) 1.C Emergency plans:** Emergency plans are not being implemented.
- **§23104(e) Major operational problems, complaint, or difficulties (MOPCDs):** MOPCD record in place but not implemented;
- **§23104(e) Dust and litter control records:** Dust control plan in place but not implemented;
- **§23104(e) Self-Monitoring:** Quarterly and Annual Self- Monitoring were not being conducted and or submitted;

2. Storage areas: Rooms 2 & 3 and Yard 1, 2, &3

- **§23104(e) Processed Storage Area (PSA):** PSA for nonferrous metals were not being utilized as indicated on the facility layout plan. Processed metals were stored outside the designated area;

3. Unprocessed and Processing Area:

- **§23104(e) Unprocessed Storage Area Capacity (USAC):** USAC exceeded and expanded outside permitted area;
- **§23104(e) Authorized Waste:** Improper storage and processing of junk vehicles;
- **§23104(e) 4 Facility layout & operations in accordance w/ approved plans & specification:** Operations was not following the approved plans & specification;

4. Buffer zones areas:

- **§23104(e) Buffer zone maintenance:** Designated buffer zones around the scrap piles were not maintained;
- **§23104(e) Buffer zones:** Designated buffer zones around the process and unprocessed piles were blocked;

5. Perimeter:

- **§23104(e) Boundary markers, benchmarks, horizontal control, vertical controls:** Observed facility boundaries not being maintained and vertical control markers were not identified during inspection;
- **§23104(e) 4 Onsite vegetation:** No vegetation maintenance on easement and around the perimeter of the facility;

6. Signage:

- **§23104(e) Signage:** Signs did not have the required approved information
 1. Permit No.
 2. Permit Expiration
- **§23104(e) Warning Signs:** Warning signs were not posted around the facility

7. Personnel Protective Equipment:

- **§23104(e) Employee identification card:** Employees are not being distinguished from non-employees via employee ID cards;

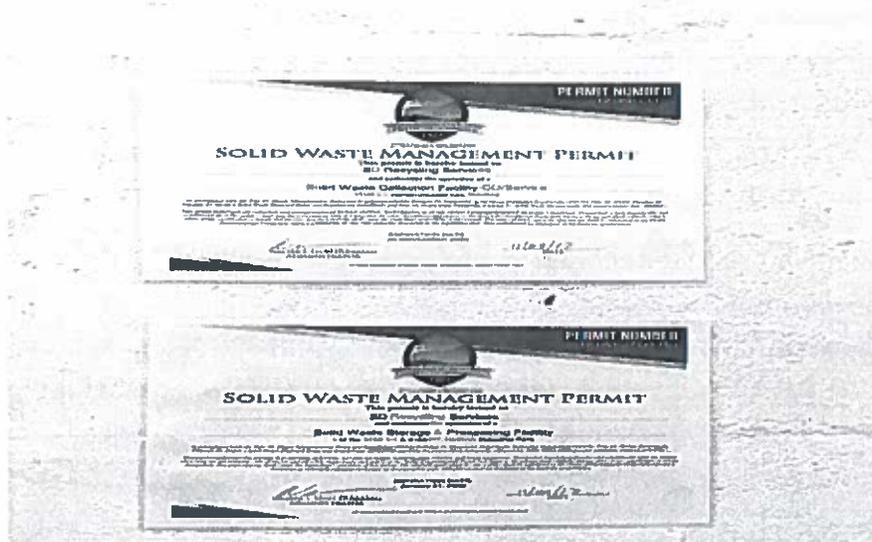


Photo No. 01

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: SD Recycling Services - Facility Permit Certificate

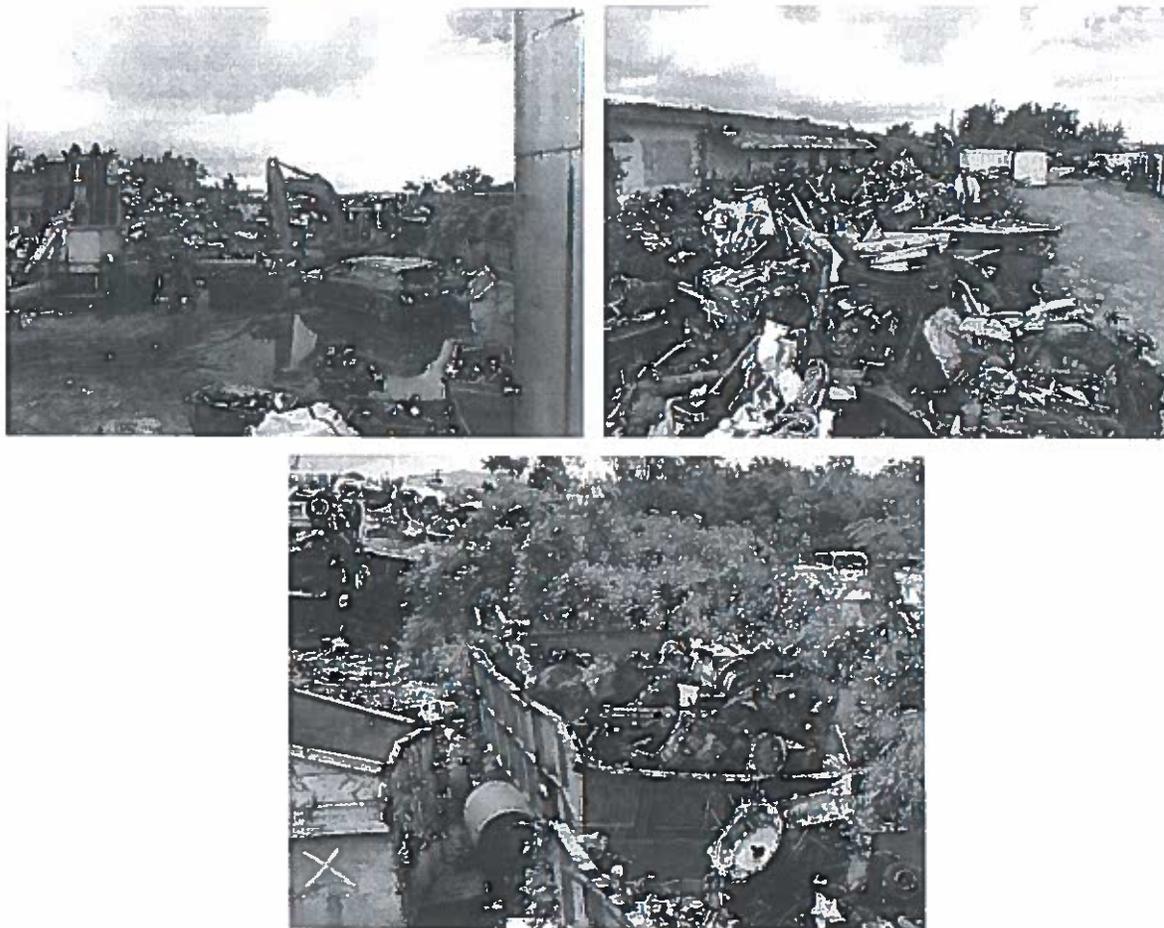


Photo No. 02

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Designated buffer zones around the processed and unprocessed piles were blocked



Photo No. 03

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Facility easement and boundary fence – Overgrown vegetation

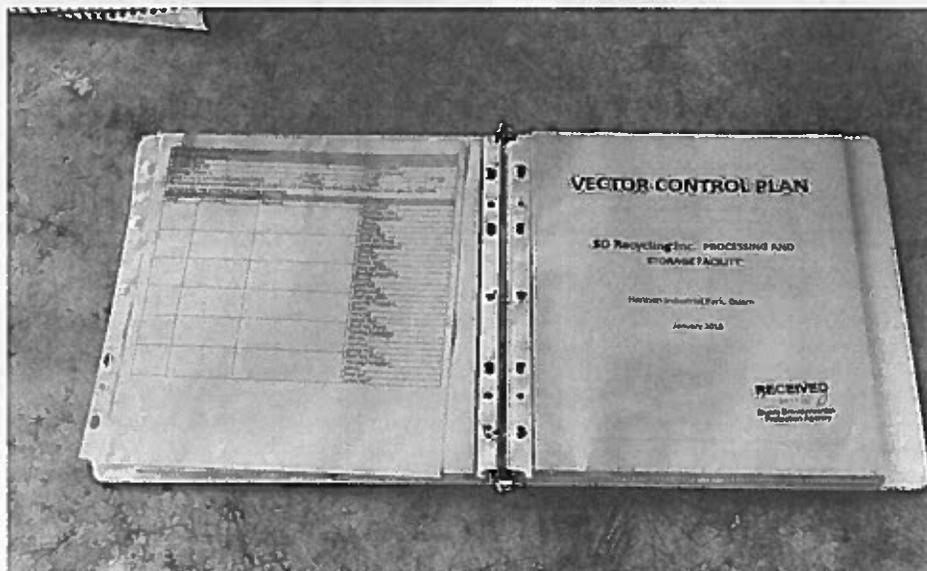


Photo No. 04

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Vector Control Plan provided but no record of vector control preventive measures applied.

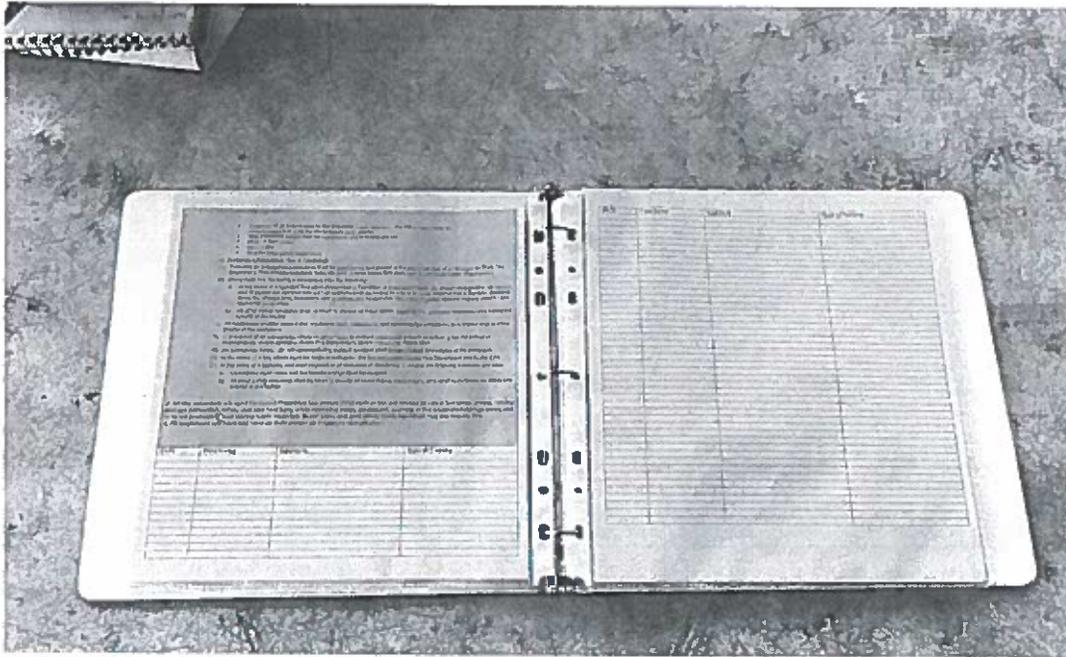


Photo No. 05

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Self-Monitoring/Employee Training for Emergency Procedures not conducted

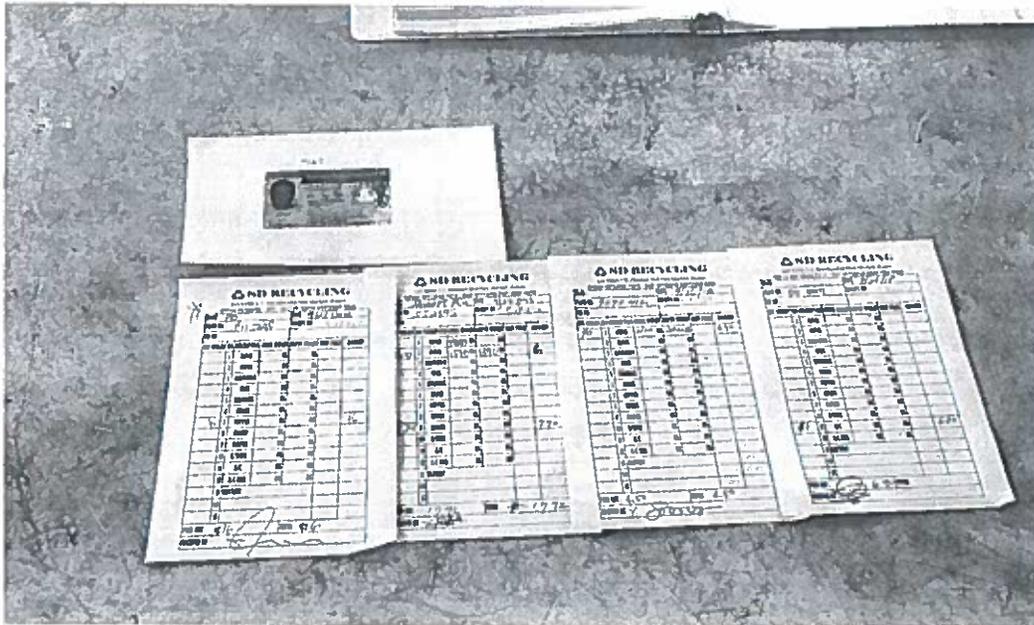


Photo No. 06

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: SD Recycling Receipts



Photo No. 07

Date Taken: 9-27-2018

Location Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Signage not in accordance with permit requirements



Photo No. 08

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Weight scale display

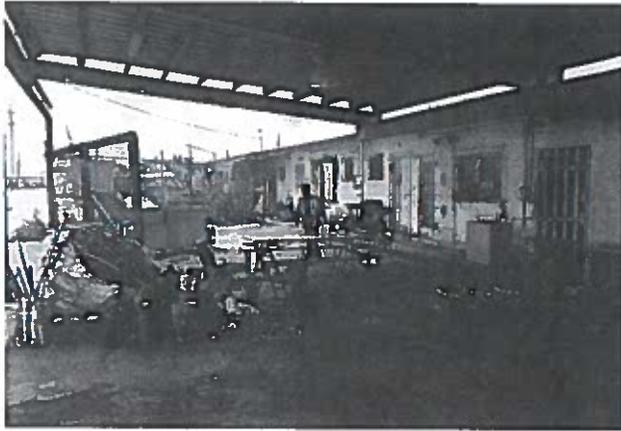


Photo No. 09

Date Taken: 9-27-2018

Location Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Trash bins utilized without cover



Photo No. 10

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Room #1: Designated storage area for palletized automobile batteries not utilized for its intended purpose



Photo No. 11

Date Taken: 9-27-2018

Location Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Room #2: Designated storage area for processed ferrous and non-ferrous metals not utilized for its intended purpose



Photo No. 12

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description Room #3: Designated storage area for other processed metals



Photo No. 13

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Open water storage tank – mosquito breeding ground



Photo No. 14

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Improper storage and processing of junk vehicles



Photo No. 15

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Unprocessed storage area exceeded and expanded outside permitted area



Photo No. 17

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Processed metal storage area on the back side of the facility blocking the buffer zones

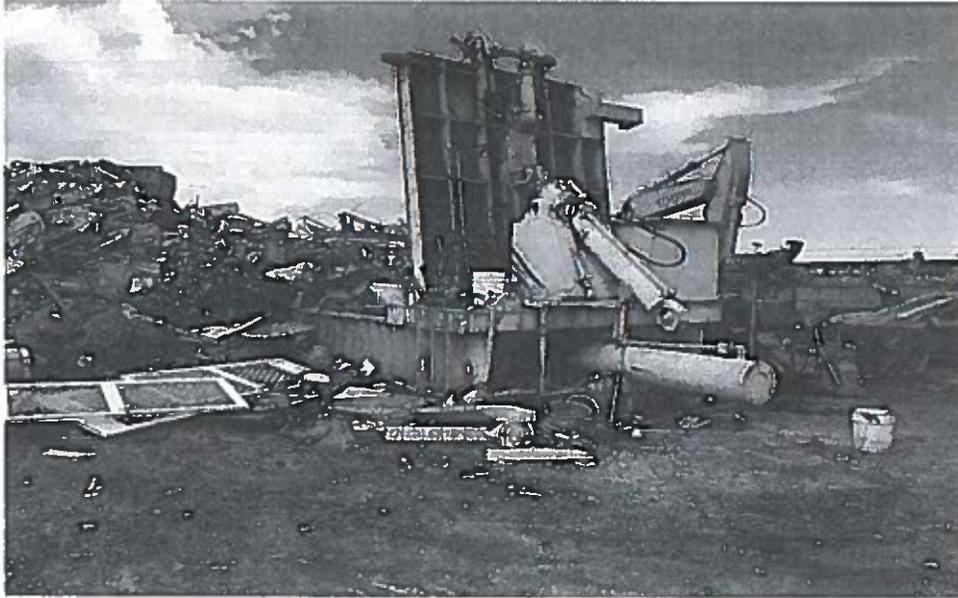


Photo No. 16

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Baler Machine stationed at the designated processing area



Photo No. 18

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Personnel protective equipment (PPE) utilized but no employee ID issued



Photo No. 19

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Fire extinguishers mounted at various locations within the facility



Photo No. 20

Date Taken: 9-27-2018

Location: Lot No.5158-1-1 & L5158-R7 Harmon Industrial Park, Guam

Description: Entrance/Exit gate for baled metals ready for shipment

GUAM ENVIRONMENTAL PROTECTION AGENCY

ATTENSIAN, PRUTTERSON, LINAY & GUZMAN



EDDIE BAZA CALVO
GOVERNOR OF GUAM

RAY TENORIO
LT. GOVERNOR OF GUAM

17-3504 Mariner Avenue Barrigada Guam 96913-1617

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SOLID WASTE MANAGEMENT FACILITY COMPLIANCE EVALUATION INSPECTION	TYPE OF INSPECTION
	SWMF CEI

I. GENERAL INFORMATION

DATE OF INSPECTION Sept. 27, 2018	DAYS/WEEK OPEN	TIME OF ARRIVAL/ DEPARTURE 9:30 / 11:30 am	
FACILITY NAME SD Recycling Services		PERMIT NUMBER 17-054 STO/ PRO	
MAILING ADDRESS PO Box 27333,	VILLAGE Barrigada	STATE Guam	ZIP CODE 96921
FACILITY REPRESENTATIVE PRESENT <i>Manager</i> Mr. Park / Beverly Park	PHONE NUMBER 988- 3450 4000 / 633-7373	EMAIL	

INSPECTION CHECKLIST- Check all sections S- Satisfactory U= Unsatisfactory or N= Not Applicable

<u>S</u>	<u>U</u>	<u>N</u>	<u>Title 22 Div.4 Ch. 23</u>	<u>Description</u>
General Conditions				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(n)	Posting of Permit
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e) 3	Operation Plan
Design				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Buffer zone maintained
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e) 4	Facility layout & operations in accordance w/ approved plans & specification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23402(c) 4	Facilities for employee convenience and equipment maintenance
Survey Control				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Boundary markers, benchmarks, horizontal control, vertical control clearly marked and maintained
Vectors				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Vectors controlled
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(n)	Vector control records
Aesthetics				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e) 4	Litter Controlled facility
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e) 4	Litter Control easement entrance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	22 GAR §21114	Trash contained in bins, containers and or roll offs <i>1 bin (no cover)</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	22 GAR §20129	Trash emptied every 7 days or sooner

S U N

Title 22 Div.4 Ch. 23

Description

§23104(e) 4

On site vegetation cleared on an as needed basis

Safety

§23104(b) 1.C

Emergency plans

§23104(e)

Buffer zones around process and unprocessed waste maintained

§23104(e)

Employee identification card

§23313(b) 1

Personnel protective equipment (hard hat, gloves, steel toe, ect...)

§23313(b) 2

Audible reverse sounding equipment, rollover devices, and seat belts

§23313(b) 2

Fire extinguishers (facility & active site)

§23313(b) 4

Communications equipment

§23104(e)

Site access controlled (fence, chains, and locks)

§23104(e)

Hours of operation posted

§23307 (b)

Open burning

Records

§23104(e)

Major operational problems, complaints or difficulties - *not provided*

§23104(e)

Dust and litter control records - *not filed out*

§23403(b)

Description, source and volume of waste received - *receipts*

§23104(b)

Description, source and volume of residual waste received - *not logged / recorded*

§23104(e)

Self - Monitoring Requirements

§23104(n)

Quarterly Reports

§23104(n)

Annual Reports

SPECIAL CONDITIONS

§23104(b) 1.C

Permitted equipment, machinery, and or building

§23301

Waste acceptance: (Waste generated on Guam only)

§23104(e)

Unprocessed Storage Area Capacity Compliance (l x w x h) or diameter

§23104(e)

Processed Storage Area Capacity Compliance (l x w x h) or diameter *no*

§23104(e)

Water tanker truck on site

Solid Waste Authorized

§23104(e)

Reflected on entrance sign

§23104(e)

Solid Waste Authorized is properly Stored, Processed, and Removed

improper processing of junk vehicles

not submitted but separate bin for residual

<u>S</u>	<u>U</u>	<u>N</u>	<u>Title 22 Div.4 Ch. 23</u>	<u>Description</u>
				Solid Waste Unauthorized
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	§23303(3)	Personnel trained to recognized unauthorized waste
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23302(a)	Screening and removal of excluded waste implemented
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	SWM Facility: Secure and deny access to unauthorized persons with the use of gates, signs, and personnel identification;
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Warning signs will be placed around the facility that read, " CAUTION STO/PROFACILITY-UNAUTHORIZED PERSONS KEEP OUT"
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Warning signs shall be legible during daylight from a distance of 25 feet;
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Facility locked when not in use;
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Facility Signs: Professionally designed sign at the entrance of the facility that includes the name of the facility;
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Authorized waste accepted pursuant to Section 15 of this permit;
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	The sign shall include time and day of operation;
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Permit number and expiration date; and
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Emergency contact information;
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	§23104(e)	Ensure the facility signs are visible and legible from a distance of 12' and not obstructed at any given time.

III. REMARKS- All blocks marked U (Unsatisfactory) or N(Not Applicable) require written explanation

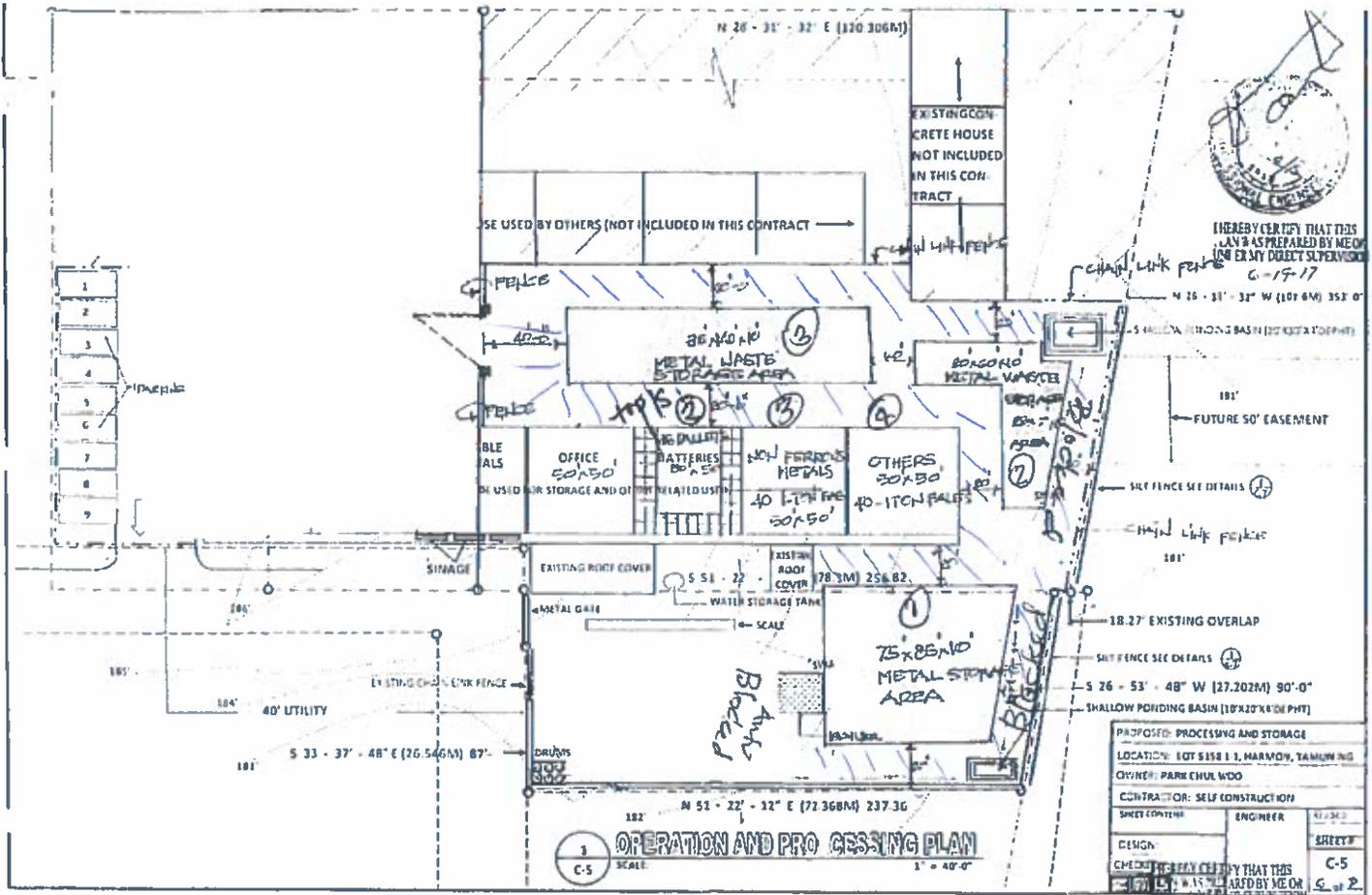
Rm 2: Battery - Needs to be cleaned + organized
 Rm 3: Ferrous/non Ferrous - need to be clean + more organized
 Rm 4: Empty - recommended to move super sacks to the open or other
 - Need to delineate buffer zones
 - oil screen present on ground where cans are stacked
 - number vehicles onsite
 - exceeding height requirements
 - 3 blue bins filled w/ mixed waste + transmission / wood / tires
 - Pallet metals + auto placed on buffer zones
 - containers filled w/ trash - need to be removed / cleaned out
 - exceeding capacity / mark all used oil tanks

SWMF REPRESENTATIVE SIGNATURE	TITLE	DATE
INSPECTOR SIGNATURE		

GUAM EPA SOLID WASTE MANAGEMENT PERMIT: STORAGE & PROCESSING

1. Facility/Permit Number: 17-054 STO/ PRO
SD Recycling Services

d. Permitted Area



Waste storage will not exceed the dimensions of approved Operations and Processing Plan

- Metal storage: ~3,500 cy : yard location
- Batteries: 15 pallets: Room 1 Storage location
- Non-ferrous metal / Other :40- 1 ton super sacks: Room2 & 3 Storage locations

Note: At no time will the SWMF exceed the approved waste storage dimensions without the written approval of Guam EPA.