



Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502-5794

Colleen Castille  
Secretary

August 18, 2006

Sent via e-mail to:

[Linda.Dunwoody@veoliaes.com](mailto:Linda.Dunwoody@veoliaes.com)

Ms. Linda Dunwoody  
Operations Manager  
Veolia Environmental Services Technical Solutions, LLC  
342 Marpan Lane  
Tallahassee, Florida 32305

Dear Ms. Dunwoody:

Enclosed is a copy of the report on the RCRA compliance inspection conducted at your facility on July 18, 2006 at 342 Marpan Lane, Tallahassee, Leon County, Florida. We found your facility to be in compliance with Permit No. HO37-82472-004 and the Resource Conservation and Recovery Act.

This inspection did not address other areas of Department jurisdiction. If you have any questions concerning this program or the enclosed report, please contact Melissa Woehle at (850) 595-8360, extension 1251.

Sincerely,

Jim Byer  
Hazardous Waste Section  
Supervisor

JCB:mwr

Enclosure

cc: Greg Newton, Veolia Environmental Services; [Greg.Newton@veoliaes.com](mailto:Greg.Newton@veoliaes.com)



Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502-5794

Colleen Castille  
Secretary

## HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-arranged

**FACILITY NAME:** Veolia Environmental Services Technical Solutions LLC (Veolia)

**DEP/EPA ID #:** FL0000207449

**ADDRESS:** 342 Marpan Lane, Tallahassee, Florida, 32305

**COUNTY:** Leon **PHONE:** (850) 877-8299 **DATE:** 7-18-06

**TIME:** 9:00 A.M.

### HW facility status

- ☐ non-handler
- ☐ CESQG
- ☐ SQG
- ☒ LQG
- ☒ transporter
- ☐ transfer facility
- ☒ TSD -Storage
- ☐ SQH
- ☐ LQH

### used oil facility status

- ☐ generator
- ☐ transporter
- ☐ transfer facility
- ☐ marketer
- ☐ processor
- ☐ on-spec. burner
- ☐ off-spec. burner
- ☐ filter generator
- ☐ filter transporter
- ☐ filter transfer facility
- ☐ filter processor

### Hg facility status

- ☐ exempt
- ☒ generator
- ☒ transporter
- ☒ Hg recovery facility
- ☒ Hg reclamation facility

### PCW facility status

- ☐ producer
- ☐ transporter
- ☐ recovery facility

## 2. APPLICABLE REGULATIONS:

- |  |  |   |   |
|--|--|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263             | <input checked="" type="checkbox"/> 40 CFR 264  |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266            | <input checked="" type="checkbox"/> 40 CFR 268  | <input type="checkbox"/> 40 CFR 270             |
| <input checked="" type="checkbox"/> 40 CFR 273 | <input type="checkbox"/> 40 CFR 279            | <input checked="" type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL:** Ms. Linda Dunwoody, Operations Mgr. - Veolia

## 4. INSPECTION PARTICIPANTS:

Linda Dunwoody and Randy Williams, Operations Supervisor –Veolia

Melissa Woehle and Kathy Gaynor – FDEP

5. **LATITUDE/LONGITUDE:** Lat. 30° 21' 51.8486" N /Long. 084°16' 8.358"W

6. **TYPE OF OWNERSHIP:** private ~~federal~~ ~~state~~ ~~county~~ ~~municipal~~

7. **PERMIT No.:** HO37-82472-004

#### 8. Site History and Description:

Veolia Environmental Services Technical Solutions LLC (Veolia TSD), formerly Onyx Environmental Services LLC, located at 342 Marpan Lane, Tallahassee, Leon County, Florida, has been in operation at this location since 1995. Veolia TSD employs approximately 16 people in the transport and processing of mercury containing lamps and devices, mercury contaminated debris, electronic waste, batteries, scrap metal, and PCB waste. Waste for recycle is picked up in NC, SC, GA, FL, TN, LA, MS, AR and AL and transported to Veolia TSD for processing.

Veolia TSD is a large quantity generator of hazardous waste and a permitted TSD. Veolia TSD's sister facilities located at 1 Eden Lane, Flanders, NJ (NJD080631369) is registered in Florida as a transporter of hazardous waste. Current operating permit, No HO37-82472-004, addresses mercury recovery, reclamation and storage and expires September 26, 2006. A permit renewal application has been submitted and is under review. No violations were cited during the hazardous waste inspection of Veolia TSD on April 26, 2005.

#### 9. Site Inspections:

On July 18, 2006, Department personnel conducted a compliance inspection of Veolia TSD to ensure compliance with the Resource Conservation and Recovery Act (RCRA.) and permit conditions. Linda Dunwoody and Randy Williams facilitated the inspection which included a walk through of the facility and records review. Records reviewed included training documentation, contingency plan, weekly inspection log, compliance related analytical data, incoming and outgoing manifest and internal tracking.

#### Record Review

The written training program indicates that Hazard Communication Training includes Hazardous Waste Management Practices & Procedures and Emergency Response Procedures. Documentation in the form of signed attendance sheets was provided and indicated that all employees, with the exception of one, were trained in 2006. The last training documented for Mr. Trueblood was 11/10/04.

A copy of the contingency plan submitted with the current permit application is maintained at the facility. There was one incident report on file indicating that on June 28, 2006 a spill of liquid mercury from a barometer (< 1lb) occurred inside the building near the retort room. The spill was recovered and retorted. No reportable quantity spills were reported.

The Weekly Inspection Log for inspections conducted May 15, 2006 through the present was reviewed and found to be complete.

Analysis reports were randomly reviewed and found to be consistent with data entered in the Recovery Rate Log and the rolling average summary for 2006.

Veolia maintains incoming and outgoing manifests on site for at least three years. Manifests were randomly reviewed for 2006 with no discrepancies noted. In addition to manifests, Veolia uses an internal tracking system for all material arriving at Veolia to be routed to other facilities for processing. The system uses the Bill of Lading and an Outgoing Material Count Sheet for each trailer to track containers by numbers located on their labels.

### Visual Inspection

The break room and main entrance to the facility are separated from the process floor and storage areas by a decontamination room. Employees and visitors are required to use disposable boot covers when entering the floor area and remove them when exiting. 'Household Accumulation' drums are used for consolidation of incoming hazardous waste. All drums were properly labeled, dated and closed. Good house keeping was evident throughout the facility in clean floors and organized storage areas.

Trailers are backed up to one of two loading docks (Picture A and B). Hazardous waste is unloaded first and universal waste is moved to the transfer area to wait in line behind shipments received earlier. Compliance with storage limits is maintained by scheduling. All incoming material is profiled and arrival dates are scheduled to prevent exceeding Transfer Area storage limits.



Picture A



Picture B

At the time of this inspection, 38 pallets of fluorescent lamps and 4 pallets of HID lamps were staged at the south end of the building (Number of lamps per pallet vary significantly). Ongoing activities at the south end of the building included HID and fluorescent lamp processing. HID lamps were being processed by removal of the inner tubes and fluorescent lamps were being processed by removal of plastic jackets in preparation for crushing (Pictures C - F). Two mechanized devices designed to process HID lamps and included in the permit application currently under review were on site. Veolia intends to use one and keep the other as a backup pending permit approval.



Picture C



Picture D



Picture E



Picture F

Waste batteries (lead acid, Ni-Cd, alkaline, magnesium, and lithium), lighting ballasts, electronic waste, and PCB oil were also stored on site during this inspection. These materials are brokered through the facility without processing other than repackaging and tracking.

Fluorescent lamps were staged for crushing to separate glass and metal end caps from phosphor powder near the center of the building. One of the two lines (conveyor belts) which feed the processing equipment, contained within a separate room, was operating at the time of this inspection. The operator swept up lamp components that spilled onto the floor and returned them to the conveyor belt as we watched (see Pictures G and H).





Picture G



Picture H

There were a combined total of 49 drums of MCD, pre-retort powder and HW generated in house. The drums were located at the north end of the building in the area labeled 'Hazardous Waste Storage Area' and the 90-day storage area. All drums were labeled 'Hazardous Waste,' closed and in good condition.

The area to the north of the building is paved and used for storage of scrap metal, glass, wooden pallets, and maintenance equipment (see Pictures I and J). There is a utility building to the south of the building used for storage of empty containers.



Picture I



Picture J

#### 10. Summary of Alleged Violations:

None

11. Recommendations:

- 1) Veolia should ensure that all employees are trained annually in hazardous waste management and emergency procedures.

Report prepared by: Melissa Woehle Date: August 18, 2006  
Melissa Woehle