Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Pensacola Recycling Inc

On-Site Inspection Start Date: 03/18/2009 **On-Site Inspection End Date:** 03/18/2009

ME ID#: 78235 **EPA ID#:** FLR000136861

Facility Street Address: 195 E Fairfield Dr, Pensacola, Florida 32503-2956

Contact Mailing Address: 3185 Newton Dr, Pensacola, Florida 32503-5106

County Name: Escambia **Contact Phone:** (850) 432-7833

NOTIFIED AS:

Non-Handler

INSPECTION TYPE:

Compliance Assistance Site Visit Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Aaron Mitchell, Inspector
Other Participants:	Sonny Watson, President/Owner; Lonnie A. Jenkins II, USEPA Environmental Scientist; Jennifer Watson Zam, Vice-President/General Manager

LATITUDE / LONGITUDE: Lat 30° 26' 59.5106" / Long 87° 13' 24.1434"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Pensacola Recycling, Inc.(PRI) is a universal waste facility that temporarily transports and handles used fluorescent bulbs, waste batteries, and waste mercury-containing devices. The facility has been in business for 13 years and is owned and operated by Sonny Watson (President) and Jennifer Zam (Vice-President). The original storage facility was located on 9th Avenue, Pensacola but has since been relocated to its present address of 195 E. Fairfield Drive, Pensacola, Florida. PRI accumulates its universal wastes in a 25-foot by 20-foot multi-unit storage unit within the Uncle Bob's Storage facility. This is a compliance assistance site visit that was facilitated by Mr. Watson and Mrs. Zam.

Process Description:

Universal wastes are stored in a 25-foot long by 20-foot wide storage unit. The wastes are accumulated in specific areas of the storage unit by similar wastes. PRI uses a "four count" system when accumulating their wastes after a pickup from a customer's facility. Most containers are stacked on pallets in rows of four and are approximately four-foot high. The containers that cannot be put in this 4 X 4 configuration are stacked in a way that ensures stability during transport. PRI uses an enclosed 6-foot wide by 8-foot long trailer to make universal waste pickups at all of its customer waste generating facilities.

Observations:
PCB ballasts are stored near the front of the storage unit in two 55-gallon drums, a small cardboard box and one 2-gallon black bucket. All the PCB ballast waste containers were in good condition, labeled, and closed. Waste batteries were stored on a pallet in a blue 30-gallon drum. The drum was properly labeled, closed, and in good condition. Along the back left side of the storage unit were four pallets of waste bulbs. Three of the pallets were shrink-wrapped with plastic for transport and were properly labeled and dated. Two of the shrink-wrapped pallets contained used 4-foot fluorescent lamps and the other pallet contained U-shaped lamps, HIDs, and compact fluorescent lamps with and without ballasts. The fourth pallet was identified by the owner

as a "working pallet". This pallet contained used 4-foot fluorescent bulbs within cardboard box containers which were not individually labeled or dated. The containers on all four pallets were in good condition and properly closed. Next to the pallets were 42 boxes of spent 8-foot long fluorescent bulbs. These boxes were properly labeled, dated, closed and in good condition. In the back right corner of the unit were 18 tubular fiberboard containers of various types of spent bulb types. Of the tubular containers, eight contained HIDs, two contained U-shaped lamps and the last eight contained 4-foot fluorescent bulbs. All of the tubular containers were properly labeled, closed and in good condition. Near the right front of the storage unit were empty containers and supplies such as a mercury spill kit, labels, and a hand written log of all containers presently in the storage unit.

PRI uses a spreadsheet to track the origins, date, and amount of universal wastes that are collected from its many customer facilities. PRI provides the customer facility a Certificate of Recycling once a pickup is performed. The dates entered on the spreadsheet are separated into 2-3 week periods. Every 2-3 weeks, a pickup of accumulated universal waste in the storage unit is performed by Veolia ES (FL0000207449). A review of the 15 pickup records during CY2008 indicate that PRI exceeded its universal waste maximum quantity (2000 Kg) for a small quantity handler on three separate occasions.

New Potential Violations and Areas of Concern:

Universal Waste Lamps

Type:	Area Of Concern
Rule:	62-737.400(5)(b)
Question Number:	39.40
Question:	Is each lamp or container labeled or marked clearly with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps"?
Explanation:	PRI had a working pallet of 4-foot long fluorescent waste lamp boxes that were not properly labeled individually. Each box had labeling that was from the generator but had no label indicating the date and time it had arrived at the PRI storage unit.
Corrective Action:	PRI needs to ensure that all boxes on a working pallet are individually labeled with the accumulation start date, generator information, and contents of the containers. PRI needs to also ensure that all boxes are in good condition and properly closed.

Universal Waste Transporter

Type:	Area Of Concern
Rule:	62-737.400(3)(a)
Question Number:	35.40
Question:	If yes, does the universal waste transfer facility store 2,000 kg. or greater of universal waste lamps or 100 kg or more of devices in areas other than on the transport vehicle and has the Transfer Facility submitted a one time registration fee of $1,000?
Explanation:	Pensacola Recycling exceeded the accumulation rate of a Small Quantity Handler(2,000kg) three times during the CY2008.
Corrective Action:	Pensacola Recycling, Inc., needs to register as a Large Quantity Handler and abide by the Federal and State regulations that govern such facilities or increase the frequency of pickups from Veolia to ensure they are in compliance with both State and Federal regulations.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Universal Waste Lamps 62-737.400(5)(b)		03/18/2009	PRI had a working pallet of 4-foot long fluorescent waste lamp boxes that were not properly labeled individually. Each box had labeling that was from the generator but had no label indicating the date and time it had arrived at the PRI storage unit.
Universal Waste Transporter 62-737.400(3)(a)		03/18/2009	Pensacola Recycling exceeded the accumulation rate of a Small Quantity Handler(2,000kg) three times during the CY2008.

ATTACHMENTS:

Waste PCB's

Waste Batteries

Tubular Waste Lamp Containers

Waste Lamp Pallets

Eight-foot Waste Lamps

Empty containers and Materials

Overall Picture of Storage Unit

Transport Vehicle

Conclusion:

To ensure PRI is following the correct rules and regulations in relation to its handler status, PRI needs to either:
(a) increase the frequency of Veolia ES pickups from its accumulation facility to ensure less than the maximum of 2,000 kg of universal waste lamps or100 kg or more of devices are accumulated at one time; or
(b) PRI should update its classification from a Small Quantity Handler (SQH) to a Large Quantity Handler(LQH) of universal wastes. The rules and regulations that a LQH must follow are in Chapter 62-737 (The Management of Spent Mercury-Containing Lamps and Devices Destined for Recycling) of the Florida State Regulations and 40 CFR 273.30-273.40 Subpart C-Standards for Large Quantity Handlers of Universal Wastes.

PRI needs to ensure that all vessels used to transport universal wastes are completely enclosed, in good condition and have the correct placarding on the outside as required.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Aaron Mitchell	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
Aaron Mitchell	FDEP	5/1/2009
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Lonnie A. Jenkins II	USEPA Environmental Scientist
INSPECTOR NAME	**INSPECTOR TITLE**
NO SIGNATURE	USEPA
INSPECTOR SIGNATURE	**ORGANIZATION**

Sonny Watson	President/Owner
REPRESENTATIVE NAME	**REPRESENTATIVE TITLE**
NO SIGNATURE	Pensacola Recycling, Inc.
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

Jennifer Watson Zam	Vice-President/General Manager
REPRESENTATIVE NAME	**REPRESENTATIVE TITLE**
NO SIGNATURE	Pensacola Recycling, Inc.
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.