



## Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 21, 2009

Stuart Stapleton  
EQ Florida Inc  
7202 E 8th Ave  
Tampa, FL 33619-3380

Re: Florida Hazardous Waste Transporter Approval

Dear Stuart Stapleton:

Your Florida Hazardous Waste Transporter Approval Certificate is enclosed. The terms and conditions of approval are specified in Sections 62-730.170 and 62-730.171, Florida Administrative Code(FAC), a copy of which is enclosed for your reference. Please note the following.

1. You must demonstrate proof of liability coverage on an annual basis, even if your insurance policy is issued on a multi-year basis. If no changes in status or insurance coverage have occurred, you can meet this requirement by submitting a certificate of liability coverage form along with the two copies of the Hazardous Waste Transporter Status Form, copies of which are available upon request from the Department of Environmental Protection.
2. A copy of your insurance policy, together with any endorsements, must be maintained at your principal place of business.
3. Your insurer can not terminate your coverage until 30 days after filing written notice with DEP, by Certified mail, that your policy has expired or has been canceled.
4. Any changes to the information specified on your approval certificate will render it null and void. It is your responsibility to advise DEP of any changes in liability coverage or status.
5. A copy of Hazardous Waste Transporter Status Form, complete with the Department approval shall be carried in each vehicle transporting hazardous waste for the transportation company.

If you intend to operate a hazardous waste transfer facility, you must submit a Transfer Facility Form [Form 62-730.900(6)]. Notification also must include a contingency and emergency plan and a facility closure plan in accordance with Rule 62-730.171(3)(a), F.A.C. The owner or operator must also demonstrate to the satisfaction of the Department that the location complies with the relevant siting requirements listed in section 403.7211(2) Florida Statutes (F.S) before the location is used as a transfer facility.

If you are currently operating an authorized transfer facility, you must maintain records of incoming and outgoing hazardous waste shipments. These records must include generator names and manifest numbers, and, unless otherwise approved by the Department, must be maintained at the transfer facility in accordance with Rule 62-730.171(6), F.A.C.

If you have any questions, please contact me at 850/245-8755.

Sincerely,

A handwritten signature in cursive script that reads "Aprilia Graves".

Aprilia Graves  
Hazardous Waste Regulation Section

RN

Enclosures: Hazardous Waste Transporter Approval Certificate  
Hazardous Waste Transporter Status Form (with insurance verification)  
Sections [62-730.170](#) and [62-730.171](#) , FAC



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2600 Blairstone Road  
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\*\*\*\*\*  
HAZARDOUS WASTE TRANSPORTER  
CERTIFICATE OF APPROVAL  
\*\*\*\*\*

This is to certify that the carrier specified below has been approved as a hazardous waste transporter in Florida. The terms and conditions of this certificate require that the holder comply with all applicable portions of Chapter 62-730, Florida Administrative Code. This certificate shall be rendered null and void if any information contained within becomes obsolete. The certificate shall remain valid through the expiration date specified below.

TRANSPORTER: EQ Florida Inc

FACILITY ID NO: FLD981932494

FACILITY ADDRESS: 2002 N Orient Rd  
Tampa, FL 33619-3356

INSURANCE CARRIER: NEW HAMPSHIRE INSURANCE

INSURANCE POLICY#: CA 7557770

EFFECTIVE DATE: August 01, 2009

EXPIRATION DATE: August 01, 2010

APPROVED TRANSFER FACILITY: YES

APPROVAL ISSUED BY: Aprilia Graves DATE: August 21, 2009  
Aprilia Graves  
Hazardous Waste Regulation Section  
850/245-8755

Are your services commercially available? Yes

## STATE OF FLORIDA

### HAZARDOUS WASTE TRANSPORTER STATUS FORM

1. Transporter Identification:

Transporter Name: EQ Florida Inc.  
Transporter EPA ID: FLD 981 932 494  
Location Address: 2002 North Orient Road  
Tampa, FL 33619  
Contact: Stuart Stapleton Telephone: 813-319-3423  
Mailing Address: 7202 E. 8th Ave.  
Tampa, FL 33619

II. Insurance Information:

Insurance Company: New Hampshire Insurance Co.  
Address: 300 S. Riverside Plaza, Suite 2100  
Chicago, IL 60606  
Contact: Carolyn Butler Telephone: \_\_\_\_\_  
Policy Number: CA 557770  
Expiration date: 8/1/10

III. Waste Information:

EPA Waste Codes for Waste Routinely or Usually Transported:

D001 D002 D008 D035 F001 F002 F003 F005

Comments: Occasionally transport nearly all types of  
characteristic + Listed waste to include D,F,P,U + K codes

IV. Certification:

I certify under penalty of law that the above information is true, correct, and complete to the best of my knowledge.

Stuart Stapleton EHS Manager  
Print/Type Name Title  
[Signature] 8/4/09  
Signature Date Signed

V. The transporter identified above is in compliance with the financial responsibility requirements for hazardous waste transporters pursuant to Chapter 62-730.170, Florida Administrative Code. The forms submitted by the transporter show compliance with the financial responsibility through 8/1/2010.  
Date

**APPROVED by Tiffaney A. Noland, changes approved by the Certifier by phone 8/21/2009**

Signature of Florida Department of Environmental Protection Representative Date Signed

## Noland, Tiffaney

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**From:** Tripp, Anthony  
**Sent:** Thursday, August 20, 2009 3:31 PM  
**To:** Noland, Tiffaney  
**Cc:** Graves, Aprilia  
**Subject:** RE: EQ Florida Inc

EQ Florida is good for the 10-day hazardous waste facility portion of their application.


Anthony R. Tripp, Ph.D., P.E.  
Professional Engineer III  
Hazardous Waste Regulation Section  
(850) 245-8766

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**From:** Noland, Tiffaney  
**Sent:** Monday, August 10, 2009 4:21 PM  
**To:** Tripp, Anthony  
**Cc:** Graves, Aprilia  
**Subject:** FW: EQ Florida Inc

Hi Tony,

Please see below. I put comments in the log. If you click on the red arrow, you can see my comments. Please add any if needed.

[7093 312854 FLD981932494](#) (RHWT) EQ FLORIDA Tampa Hillsborough SWD [8/7/2009](#) 3 Registered- 8/10/2009 Completeness [Noland T](#)   
Application 11:42:22 Review AM


Thanks,

---

**From:** Noland, Tiffaney  
**Sent:** Monday, August 10, 2009 3:12 PM  
**To:** Tripp, Anthony  
**Cc:** Graves, Aprilia  
**Subject:** EQ Florida Inc

Hi Tony,

Please see below. We just received a Notification with transfer facility documentation with it. Thought you want to know.

[7093 312854 FLD981932494](#) (RUOH) EQ FLORIDA Tampa Hillsborough SWD [8/7/2009](#) 3 Registered- 8/10/2009 Completeness [Noland T](#)   
Application 11:42:22 Review AM

Thanks,

*Tiffaney Noland*  
*Florida Dept of Environmental Protection*  
*2600 Blair Stone Rd.*  
*Tallahassee, FL 32327*

*Office: (850)245-8727*

*Fax: (850)245-8803*

*[Tiffany.Noland@dep.state.fl.us](mailto:Tiffany.Noland@dep.state.fl.us)*



# THE ENVIRONMENTAL QUALITY COMPANY

EQ FLORIDA, INC. • 7202 E. 8<sup>TH</sup> AVENUE • TAMPA, FLORIDA 33619 • TEL 800-624-5302 • FAX 813-628-0842

REGISTERED MAIL NO. 7007 1490 0002 1565 3174  
RETURN RECEIPT REQUESTED

August 4, 2009

Department of Environmental Protection  
2600 Blair Stone Road; MS 4550  
Tallahassee, FL 32399-2400

Dear Sir:

Please find attached a completed Hazardous Waste Transporter and transfer facility renewal package. If you have any questions concerning this matter, please call me at 813-319-3423.

Sincerely,

Stuart Stapleton  
EHS Manager



**Poor Original**





**9. Type of Regulated Waste Activity ( Mark 'X' in all that apply):****A. Hazardous Waste Activities:****(1) Generator of Hazardous Waste**

(Choose only one of the following three categories.)

- ☒ a. Large Quantity Generator (LQG):  
Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of *non-acute* hazardous waste; **or** Greater than 1 kg (2.2 lbs) of *acute* hazardous waste
- ☐ b. Small Quantity Generator (SQG):  
Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of *non-acute* hazardous waste and/or 1 kg (2.2 lbs) or less of *acute* hazardous waste
- ☐ c. Conditionally Exempt SQG (CESQG):  
Generates in any calendar month 100 kg/mo or less (220 lbs.) of *non-acute* hazardous waste and 1 kg (2.2 lbs) or less of *acute* hazardous waste

In addition, indicate other generator activities that apply.

- ☐ d. United States Importer of hazardous waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 7, mark 'X' in all that apply.

**(2) Treater, Storer, or Disposer of Hazardous Waste**

(at your facility) Note: A hazardous waste permit may be required for this activity.

- ☒ a. Operating Commercial TSD
- ☐ b. Operating Non-commercial TSD
- ☐ c. Non-operating: Postclosure or Corrective Action Permit or Consent Order (HSWA, etc.)

**(3) Recycler of Hazardous Waste (at your facility)**Specify: ☐ Commercial; ☐ Non-Commercial.

A permit is required for storage prior to recycling.

**(4) Exempt Boiler and/or Industrial Furnace**

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

**(5) Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities - Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.****(6) Underground Injection Control - Mark an 'X' even if the UIC well at your facility does not receive hazardous waste.****(7) ☒ Transporter of Hazardous Waste [ Note: A Certificate of Liability Insurance is required along with this registration.]**Registration must be renewed annually. ☐ a. For own waste only ☐ b. For commercial purposes**c. Hazardous Waste Transporter Insurance Information**

Insurance Company \_\_\_\_\_

Address \_\_\_\_\_

Contact \_\_\_\_\_ Telephone \_\_\_\_\_

Policy Number \_\_\_\_\_ Expiration date \_\_\_\_\_

d. **Transportation Mode** ☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other - specify \_\_\_\_\_e. ☒ **Hazardous Waste Transfer Facility:** Storage Volume 20,000 gals. & 100 cy☐ **Initial notification**

The following items are required to be submitted with the initial notification for a transfer facility [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

- ☐ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]
- ☐ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]
- ☐ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]
- ☐ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]
- ☐ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]
- ☐ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

☐ **Notification of changes in above items**☐ **Annual update notification**

**B. Universal Waste (UW) Activities (Mark 'X' in all that apply) ("accumulated" means at any one time):**

- ☐ Large Quantity Handler (LQH) = 5,000 kg (11,000 lb) or more of any combination of UW accumulated
- ☒ Small Quantity Handler (SQH) = always less than 5,000 kg accumulated
- ☒ Mercury-containing devices LQH = 100 kg (220 lb) or more accumulated by for-hire handler
- ☐ Mercury-containing devices SQH = less than 100 kg accumulated by for-hire handler
- ☒ Mercury-containing lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler
- ☐ Mercury-containing lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler
- [Note: 4 lamps = 1 kg, 62-737.200(10)]
- ☐ Pharmaceuticals LQH = 5,000 kg or more of universal pharmaceutical waste (UPW) accumulated
- ☐ Pharmaceuticals LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste accumulated
- ☒ Pharmaceuticals SQH = always less than 5,000 kg of UPW and always 1 kg or less of acutely hazardous UPW accumulated

(1) For those Managing	Generate/ Accumulate	Transport (see note in instructions)	Handle at Transfer Facility	(2) Enter your estimate of the maximum amount (in pounds) of each type of UW on site or transported at any one time.
a. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	15,000
b. Pesticides	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	30,000
c. Pharmaceuticals	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3,000
d. Mercury Containing Devices	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5,000
e. Mercury Containing Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	8,000

**(3) Mercury Recovery and/or Reclamation Facility** ☐ [Chapter 62-737, F.A.C.]

Note: A hazardous waste permit is required for this activity. [Rule 62-737.800, F.A.C.]

**(4) Reverse Distributor of UW** ☐ Pharmaceuticals ☐ Lamps ☐ Devices ☐

**(5) Destination Facility for UW** ☐ Note: for this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

**C. Used Oil Activities:****(1) Used Oil Transporter - indicate type(s) of activity(ies):**

- ☒ a. Transporter
- ☒ b. Transfer Facility

**(2) ☐ Collection Center****(3) ☐ Used Oil Processor** (A permit is required for this activity.)**(4) ☐ Off-Specification Used Oil Burner****(5) ☐ Used Oil Fuel Marketer****(6) Used Oil Filter**

- ☒ a. Transporter
- ☒ b. Transfer Facility
- ☐ c. Processor
- ☐ d. End User

**(7) Used Oil Transporters, Transfer Facilities, Collection Centers, Off-Specification Burners and Marketers must pay an annual \$100 registration fee. Used Oil Processors are exempt from this fee. If applicable, enclose a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection.**

☒ A check is enclosed.

**(8) Specific Certification to be signed by all Used Oil Transporters**

I certify as a Used Oil Transporter that the training program and financial responsibility required under Section 62-710.600, F.A.C., are in place, current and being adhered to. If any modifications have been made to the originally approved training program, they are explained in attachments to this registration form. Evidence of financial responsibility is demonstrated by the attached Used Oil Transporter Certificate of Liability Insurance, DEP form 62-710.901(4), F.A.C.

Signature of Authorized Person

Stuart Stapleton

Print Name of Authorized Person

**(9) The records required under the provisions of Rule 62-710.510, F.A.C., are kept at (check one):**

- ☒ our mailing (business) address
- ☐ The site (facility) address

EPA ID No.

FLD981932494

**D. Other State Regulated Waste Activities:**☐ **Petroleum Contact Water (PCW) Handler** [Chapter 62-740, F.A.C.]

Note: A water facility permit may be required for this activity.

**10. Waste Codes for Federally Regulated Hazardous Wastes:** List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112).

Hazardous waste transporters list codes routinely or usually transported. Use an additional page if more spaces are needed.

1	D001	2	D002	3	D003	4	D004	5	D005	6	D006	7	D007
8	D008	9	D009	10	D010	11	D011	12	D012	13	D013	14	D014
15	D015	16	D016	17	D017	18	D018	19	D019	20	D020	21	D021
22	D022	23	D023	24	D024	25	D025	26	D026	27	D027	28	D028

**11. Other Status Changes (Mark 'X' in all that apply):****A. Non-Handler of Regulated Waste at This Facility**

- ☐ (1) Business no longer generates, transports, treats, stores, or disposes of hazardous waste
- ☐ (2) Waste generated by business has been delisted.
- ☐ (3) Other (explain) \_\_\_\_\_

**B. Facility Closed**

- ☐ (1) Closed at this location and **moved or moving** to another - submit a new Form 8700-12FL for the new location if you will be handling regulated waste there.
- ☐ (2) Out of Business - Business closed on \_\_\_\_\_ (Date). Please provide a contact person, mailing address, and phone number where you can be reached after closing.

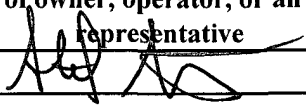
Contact \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_

City, State, Zip \_\_\_\_\_

☐ **C. Property Tax Default**☐ **D. Petition for Bankruptcy Protection**

**12. Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. If I have notified as a transfer facility, I am aware that transfer facilities must comply with the requirements of Rule 62-730.171, FAC, and Rule 62-730.182, FAC.

Signature of owner, operator, or an authorized representative	Print Name and Title	Date Signed (mm-dd-yyyy)
	Stuart Stapleton - EHS Manager	07/06/2009
		8/4/09

If the person who filled in this form is not the Facility Contact or Operator, please complete the information below:

(Name of person completing this form) \_\_\_\_\_

(Phone Number) \_\_\_\_\_

(E-mail Address) \_\_\_\_\_

**13. Comments:**

SEE ATTACHEMENT 1 FOR ADDITIONAL EPA WASTE CODES.

**STATE OF FLORIDA**  
**HAZARDOUS WASTE TRANSPORTER CERTIFICATE OF LIABILITY**  
**INSURANCE**

1. New Hampshire Insurance Company  
(Name of Insurer)  
  
(the "Insurer"), of 300 S. Riverside Plaza, Suite 2100, Chicago, IL 60606  
(Address of Insurer)

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to

EQ Holdings, Inc.  
(Name of Insured)

(the "Insured"), of 36255 Michigan Ave., Wayne, MI 48184  
(Address of Insured)

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 62-730.170. The coverage applies at:

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Location</u>
FID981932494	EQ Florida, Inc.	7202 E. 8th Ave., Tampa, FL

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of  
\$ 1,000,000 for each accident, exclusive of legal defense costs. The coverage is provided  
under policy number CA7557770, issued on 8/1/2009.  
(date)

The effective date of said policy is 8/1/2009 and the expiration date of said policy  
(date)  
is 8/1/2010.  
(date)

This insurance is excess and the company shall not be liable for amounts in excess of  
\$ \_\_\_\_\_ for each accident in excess of the underlying limit of  
\$ \_\_\_\_\_ for each accident, exclusive of legal defense costs. The coverage is provided  
under policy number \_\_\_\_\_, issued on \_\_\_\_\_. The effective date of  
(date)  
said policy is \_\_\_\_\_ and the expiration date of said policy is \_\_\_\_\_.  
(date) (date)

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
- (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
- (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one of more States including Florida.

Carolyn Butler  
(Signature of Authorized Representative of Insurer)

Carolyn Butler  
(Typed name)

Regional Manager  
(Title)

Authorized Representative of

New Hampshire Insurance Company  
(Name of Insurer)

300 S. Riverside Plaza, Suite 2100, Chicago, IL 60606  
(Address of Representative)

# ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE  
7/30/09

**PRODUCER**

Willis of Michigan, Inc.  
32255 Northwestern Hwy., Suite 201  
Farmington Hills, MI 48375  
(248) 539-6600

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

**INSURERS AFFORDING COVERAGE**

**INSURED**

BQ Holdings, Inc.  
36255 Michigan Ave.  
Wayne, MI 48184

INSURER A: American Inter'l Specialty Lines Ins Co

INSURER B: New Hampshire Insurance Company

INSURER C: American International Special Lines Insurance Co

INSURER D: Illinois National Insurance Company

INSURER E:

**COVERAGES**

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	<b>GENERAL LIABILITY</b> <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> \$100,000 Deductible  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input checked="" type="checkbox"/> LOC	57666391	08/01/09	08/01/10	EACH OCCURRENCE \$ 1,000,000 FIRE DAMAGE (Any one fire) \$ 300,000 MED EXP (Any one person) \$ 25,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 \$
B	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS  <b>GARAGE LIABILITY</b> <input type="checkbox"/> ANY AUTO	CA7557770	08/01/09	08/01/10	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY: AGG \$
C	<b>EXCESS LIABILITY</b> <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE  <input type="checkbox"/> DEDUCTIBLE <input type="checkbox"/> RETENTION \$	576666618	08/01/09	08/01/10	EACH OCCURRENCE \$ 25,000,000 AGGREGATE \$ 25,000,000 \$ \$ \$
D	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b>	WC6500646	01/01/09	01/01/10	<input checked="" type="checkbox"/> WC STATU-TORY LIMITS <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
C	<b>OTHER</b> Contractor's Pollution		8/1/09	8/1/10	Included Under Umbrella/Excess

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

**CERTIFICATE HOLDER**

ADDITIONAL INSURED; INSURER LETTER:

**CANCELLATION**

For Information Purposes Only

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

*Kevin McCann*

**Pollution Legal Liability**

Insurer: American International Specialty Lines Insurance Co

Policy Number: PLS 2673560

Policy Period: 8/01/2009 to 8/01/2012

Limit of Liability:

\$35,000,000. Each Incident

\$35,000,000 Aggregate

**Excess Pollution Legal Liability**

Insurer: Illinois Union Insurance Company

Policy Number: EXCG24881209001

Policy Period: 8/01/2009 to 8/01/2012

Limit of Liability:

\$15,000,000. Each Incident

\$15,000,000 Aggregate

**Contractor's Equipment**

Insurer: Fireman's Fund Insurance Company

Policy Number: MXI93009311

Policy Period: 8/01/2009 to 8/01/2010

Limit of Liability:

\$500,000 Leased & Rented Limit

Comerica

BLT  
Letter of Credit Division

TELEX NO: 3772134  
FAX NO: 313 222 9115  
SWIFT: MNBDUS33

COMERICA BANK  
411 WEST LAFAYETTE (MC 3341)  
DETROIT, MI 48226

AMENDMENT TO LETTER OF CREDIT  
DECEMBER 15, 2008

CREDIT NUMBER OF  
ISSUING BANK: 588011 -02

RECEIVED

AUG 07 2009

APPLICANT:

BQ FLORIDA, INC.  
7202 EAST 8TH AVE.  
TAMPA, FLORIDA 33619

BY: BSHW

BENEFICIARY:  
FINANCIAL OFFICER, FLORIDA DEP  
TWIN TOWERS OFFICE BLDG, MS 4560  
2600 BLAIR STONE RD  
TALLAHASSEE FL 323992400

AMENDMENT NUMBER: 05

THIS AMENDMENT IS TO BE CONSIDERED  
AS PART OF THE ABOVE CREDIT AND MUST  
BE ATTACHED THERETO.

GENTLE MEN:

IN ACCORDANCE WITH INSTRUCTIONS RECEIVED FROM OUR PRINCIPALS THE ABOVE  
CAPTIONED CREDIT HAS BEEN AMENDED AS FOLLOWS:

THE AMOUNT OF THIS CREDIT HAS INCREASED BY 6,376.34 USD.

THE AMOUNT OF THIS CREDIT ISSUED NOW TOTALS USD 261,430.09

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

VERY TRULY YOURS,

*M. Joe Moore*

AUTHORIZED SIGNATURE

ORIGINAL



**GENERAL INFORMATION**

**FOR**

**EQ FLORIDA, INC. (EQFL)**

2002 North Orient Road  
Tampa, Florida 33619

FLD 981 932 494

**GENERAL INFORMATION**  
**(Contents)**

**INTRODUCTION**

**General Information**  
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## **2. GENERAL INFORMATION**

### **2.1 INTRODUCTION**

#### **General Information**

This submittal is for the renewal of the existing Hazardous Waste Operating Permit for the EQ Florida, Inc. (EQFL), formerly known as US Liquids Inc., hazardous waste container storage and treatment facility. EQFL is a division of EQ Holding Company, a Michigan Corporation.

ID No.:	FLD 981 932 494
Permit No.:	H029-263213
County:	Hillsborough
Issue Date:	June 22, 2004
Expiration Date:	January 22,2006
Address:	EQ Florida Inc. 2002 North Orient Road Tampa, Florida 33619 (813) 623-5302

There are no significant physical changes to the facility from the original permit to this renewal. The facility remains a 1.4 acre more or less, (MOL) site consisting of an office building with small laboratory, a 5,866 square foot (MOL) totally enclosed building utilized for the container storage and treatment of hazardous waste, and a vehicle loading/unloading area.

The facility operations remain essentially unchanged from the original permit. The operations remain container storage and treatment. There are no immediate plans for utilizing the press for treatment but the press may be utilized for treatment prior to the expiration of this permit should business, environmental regulations, or economics justify the treatment. The facility has operated as a container storage facility. Some re-packaging and blending of similar waste streams is performed at the facility. There is no on-site disposal.

The facility General Information, Inspection Plan, Contingency Plan, Procedures, Training Program, Waste Analysis Plan, Container Management, Closure Plan, and other information have been updated and revised to reflect regulatory changes and more detailed and accurate conditions.

Non-RCRA regulated waste information does not apply to this permit and is for informational purposes only. These items are regulated under Subtitle D regulations, and RCRA Subtitle C regulations do not apply (by definition). The EQFL solid waste management facility is similar to transfer facilities of other solid waste facilities except it happens to be located at a permitted hazardous waste facility. EQFL is also a registered hazardous waste transporter with a state registered (on site) transfer facility. EQFL far exceeds the minimum regulatory requirements often typical of solid waste and transporter facilities. Examples of this include HSWA SWMU requirements, voluntary groundwater monitoring, on-site trained personnel and equipment to handle virtually any emergency, and more. Management of non-RCRA regulated waste does not interfere with management of RCRA regulated hazardous waste.

The EQFL facility had no solid waste activities prior to the existing permit. A Solid Waste Management Unit (SWMU) RCRA Facility Assessment (RFA) of the EQFL facility was initiated on February 15, 1993. There have been no releases to the environment of hazardous waste or hazardous waste constituents for any EQFL SWMU.

The EQFL facility hazardous waste capacity is 50,000 gallons; a maximum of 20,000 gallons in Bays 1 and 3, and a maximum of 10,000 gallons in Bay 2. The capacity is consistent with the physical limitations of the facility and is used throughout this application to determine containment, closure cost, financial assurances, aisle space requirements. Actual day to day volume is usually less than 25,000 gallons. EQFL will utilize the container arrangement shown on Figure 5.12A. The containers will normally be stored in a "single-stacked" arrangement. "Single-stacked" indicates that no forklift is necessary to load, unload, or move any container. Although the storage is referred to as "single stacked," small containers (such as 5-gallon pails) and aerosol 55 gallon drums will be manually stacked on top of the "single stacked" containers.

EQFL will occasionally utilize a double-stack container arrangement. The same storage arrangement (Figure 5.12A) shown for single-stacking will be utilized for double-stacking with the exception that adjacent storage rows will not be utilized for container storage so that each row of double-stacked containers has access to an eight-foot aisle (if needed). The eight-foot aisle will allow turning radius access for a forklift to stack and unstack containers. Forklifts will not be utilized in the ignitable/reactive bay (Bay 2) unless they are Class I rated, explosion proof, or equivalent.

The sectioning between single and double stacked storage utilization will be by a containment sump basis. Specifically, the stacking requirements will apply to all containers utilizing the same containment sump. This would make it permissible to have the containers in Bay 1A double stacked and the containers in Bay 1B single stacked since Bay 1A utilizes different containment sumps from Bay 1B. If any containers are double stacked (other than small containers manually stacked on top of single-stacked containers) in the area contained by a common containment sump, then all containers in that area would have to meet the double stacked requirements. Small containers may be manually stacked on top of single stacked containers.

The single and double stacked container arrangements are summarized below:

<b><u>SINGLE STACKED</u></b>	<b><u>DOUBLE STACKED</u></b>
No forklift required.	Forklift utilized.
Two-foot (minimum) aisle space.	Eight-foot (minimum) aisle access for each row.
All bays.	Bays 1A, 1B, 3A, and 3B only (not Bay 2).
Small containers manually stacked on top of single-stacked containers.	Small containers manually stacked on top of single-stacked containers. Aerosol Drums made from Labpacks

The forklift utilized will be equivalent to the specifications provided for the LS2200 model. These

specifications have been added to Attachment 16.

The sump grids utilized in the EQFL facility warehouse are 2 inch by 3/16 inch bar grating. The gratings are ten square feet in area (each section) and cover a span of three feet. The uniform load capacity of each section of bar grating (of these specifications) is 18,330 pounds. This far exceeds the maximum expected load of 2,400 pounds for the stacking forklift plus 2,400 pounds for a pallet of four heavy 55-gallon drums (4,800 pounds total).

Double stacking of containers and pallets of containers is a common practice throughout the chemical processing and commercial hazardous waste storage and treatment industries. These facilities are able to inspect containers, respond to and manage leaks, and move the containers. Double stacking of containers (or pallets of containers) actually makes waste management easier in many instances. Emergency movement of hazardous waste containers can be done four containers at a time rather than manually one at a time. Leaks and damaged containers are more easily detected when double stacked since they are usually at eye level during inspections.

Waste management operations are described in detail to provide information that is current and accurate to actual conditions and practices. The facility remains essentially a transfer facility with container storage and no on-site disposal.

This permit renewal includes a section addressing air-permitting requirements. Calculations using conservative "worst case" data show the EQFL facility is far below applicable air permitting requirements.

## **Facility Layout and Operations**

The EQFL facility is a permitted hazardous waste storage and treatment facility. No on-site disposal occurs at the EQFL facility. EQFL manages non-RCRA regulated waste, household hazardous waste, used oil and filters, mercury containing lamps and devices, TSCA exempt and limited quantity exempt PCB and asbestos wastes, recyclable materials, and other similar substances, materials, and wastes. The primary waste management operations are storage and transfer.

The facility consists of the 1.4-acre (MOL) site and adjacent (contiguous) property of 3.06 – acre (MOL). The permitted facility is located on the site is a 5,866 square foot (MOL) building, which was specifically designed for hazardous waste management. The container storage building is composed of three separate bays. The bays are separated by an eight-inch wide concrete block wall and fire doors. The wall extends from the floor to the roof and has been designed with a minimum fire resistance of four hours.

The total hazardous waste capacity within the building is 50,000 gallons when containers are double-stacked on pallets. The hazardous waste consists of solids, sludges, liquids, and lab packs.

The facility site plan (survey) at a scale of 1 inch to 20 feet is shown in Attachment 8.1. The facility consists of a 1.4-acre (MOL) site. The land was previously undeveloped. No previous solid waste management units (SWMUs) were located on this site. The SWMUs currently identified on site are described in the SWMU section. The surrounding land uses are heavy industrial. These include two National Priority List (NPL) (Superfund) sites, metals recyclers, a construction debris transfer facility, steel cleaning and coating, fishery, gas manufacturing, pesticide formulator, and bail bonds businesses.

The surrounding land use is shown in Attachment 5.6. The facility is located in the city of Tampa in a heavy industrial area known as Orient Park. The area is zoned heavy industrial. The area zoning is shown in Attachment 10.3. The City of Tampa classifies this area as suitable for hazardous waste facilities. The West Florida Regional Planning Council (WFRPC) in 1985 performed in-depth evaluations to locate a suitable area for a hazardous waste storage and treatment facility. This area was among those chosen.

An aerial photograph of the site at a scale of 1 inch to 200 feet is included as Attachment 10.4. A topographic map at a scale of 1 inch to 2,000 feet is included as Attachment 10.1. The facility drawings are included as Attachment 9. The facility Record Drawings are included as Attachment 8. The facility is located outside the 100-year flood plain. A Federal Emergency Management Agency (FEMA) map indicating this fact is included as Attachment 10.6.

## 2.2 OPERATIONS DESCRIPTION

The primary operation at the EQFL facility is storage of hazardous waste in containers, primarily 55-gallon drums. A minimum of 10 percent of each hazardous waste stream entering the facility is sampled. Some waste is recontainerized or consolidated in other containers of similar size or larger. Recontainerization operations may also include use of the following equipment: paint can crusher, aerosol spray can recycler, drum crusher, and rag compactor. Wastes are primarily shipped out of the facility in 55-gallon drums, although some wastes will be consolidated in roll-off dumpsters or tanker trucks for transport off-site.

### **Waste Received**

Waste is received at the facility primarily in 55-gallon drums. Waste is also received in other D.O.T. approved containers to including bulk shipments. Drums and other man portable containers are off-loaded into the warehouse. Bulk loads of received materials are stored outside in approved areas. Received containers are moved categorized and stored according to waste type. The following waste type categories are handled at the facility:

1. Non-RCRA
2. Flammable
3. Poison
4. Toxic
5. Acid
6. Alkaline
7. Hazardous Organic Compounds (HOC)
8. Oxidizers
9. Reactive
10. Otherwise Regulated Material (ORM or Class 9)

No regulated explosive, regulated radioactive, or regulated biohazardous waste will be managed at the EQFL facility.

Waste types include liquids, solids, sludges, and lab packs (waste which is packaged in its original container). Lab pack waste usually consists of waste generated by private (household) individuals such as paints, pesticides, household wastes, etc.

The following operations are fully described in the Process Description and Procedures, Structures, and Equipment Descriptions sections of this permit renewal. Equipment specifications are included as Attachment 16.



### **Recontainerization**

Some of the waste received will be recontainerized. In general, recontainerization includes consolidation of like waste into similar sized or larger containers. Other recontainerization operations will include paint can crushing, aerosol can recycle, drum crushing and rag compacting, loading to roll-offs, and loading to tanker truck. All waste transfer and recontainerization is conducted utilizing best management practices. Hazardous wastes have already been profiled and approved as described in the EQFL Waste Analysis Plan. Each hazardous waste stream has been sampled and quality control verified as described in the EQFL Waste Analysis Plan. Only compatible wastes are transferred or recontainerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and incompatible wastes, waste analysis, record keeping, and container management that apply for treatment and storage will also apply for waste transfer and recontainerization. Waste processing areas, to include recontainerization operations and paint can crushing locations, are identified on Attachment 5.16.

Some of the waste received will be recontainerized or overpacked from one container to another. Wastes are transferred between container by pumping (using a portable pump) or pouring directly from one container to another. All container transfer operations take place within the storage building, except paint can crushing, and loading to roll-offs or tankers. Attachment 5.16 identifies waste processing locations.

### **Paint Can Crushing**

The facility receives water-based latex and solvent-based paint in one-gallon cans for recontainerization and disposal. The majority of the paint received is from household waste. This operation will include opening the container, crushing the paint can, collecting the paint waste, collecting the empty containers and containerizing the paint for transport off-site. This operation will take place within the permitted processing areas identified in Attachment 5.16.

### **Aerosol Can Recycle**

The aerosol can recycler is a machine which crushes aerosol cans while simultaneously capturing all liquids into a 55 gallon drum. The aerosol can is placed within an enclosed unit and is punctured. The material within the can is ejected into the drum. A filter unit is attached to the machine to capture any vapors expelled from the drum/can during the recycling operation. This operation will take place within the paint can crushing operations located in area 2A as illustrated on figure 5.13.

### **Drum Crushing and Rag Compacting**

The drum crusher and rag compactor will consist of a closed cabinet unit located inside the storage building. A drum is placed inside the unit and a ram is used to crush the drum. The unit contains a grate and collection pan at the bottom to catch any liquid or solid residue material from the crushed drum. The material is drummed as waste.

The rag compactor works in a similar manner in that a drum of waste rags is placed inside the unit. A ram, which is slightly smaller than the drum opening, is used to compact the rags inside the drum.

### **Loading to Roll-Offs**

Recontainerization operations will include loading material to roll-off dumpsters for transport off-site. Roll-offs will be loaded in the loading/unloading area located outside the storage building. Loaded roll-offs will be manifested and shipped off-site for ultimate treatment and disposal.

Typically, only solid material is loaded to the roll-off containers, although some sludge material may also be off-loaded. However, free-flowing liquids are not typically contained in the roll-offs. The roll-offs will be kept closed except when loading.

Roll-off containers approved for storing or transporting liquids will be utilized if the hazardous waste being transported or stored contains free liquids. These containers may include "sludge boxes" or sealed roll-offs with liners.

### **Tanker Loading**

Liquid wastes will be loaded to a tanker truck for transport off-site. Wastes will be pumped from a container directly to the tanker. Tankers will be kept closed except when loading.

**CLOSURE PLAN**

**FOR**

**EQ FLORIDA (EQFL)**

2002 North Orient Road  
Tampa, Florida 33619

FLD 981 932 494

## **CLOSURE PLAN (Contents)**

### **INTRODUCTION**

General / Applicability  
Waste Characterization

### **CLOSURE PERFORMANCE STANDARDS**

### **PARTIAL CLOSURE AND FINAL CLOSURE ACTIVITIES**

### **MAXIMUM WASTE INVENTORY**

### **CLOSURE ITEMS**

Waste Inventory  
*Filter Press (Treatment)*  
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### **DECONTAMINATION**

### **COST ESTIMATE**

### **FINANCIAL ASSURANCES**

### **SCHEDULE FOR FINAL CLOSURE**

### **CERTIFICATE OF CLOSURE**

### **CLOSURE SUMMARY**

### **CLOSURE WORKSHEETS**

## 11. CLOSURE PLAN

### INTRODUCTION

#### General/Applicability

This closure plan has been adopted in accordance with the Code of Federal Regulations, Part 264, Subpart G.

This document outlines closure requirements for **both** the permitted EQFL facility (storage and treatment) and the EQFL on-site transfer facility (transporter). Although closure requirements are mandatory for both TSD and transfer operations, financial assurances are required only for permitted TSD operations. The EQFL financial assurances will cover permitted TSD operations (only) as required by 40 CFR 264 Subpart H.

Facility Name:	EQ Florida Inc.
EPA ID Number:	FLD 981 932 494
Facility Address:	2002 North Orient Road Tampa, Florida 33619
Telephone:	813 623-5302
Contact:	Steve Resendez
Mailing Address:	7202 East Eighth Avenue Tampa, Florida 33619

EQ Florida Inc. operates a storage/treatment and transfer facility. Storage at the facility occurs in containers only. The maximum storage inventory is as indicated below:

<u>Process Type</u>	<u>Volume</u>
Container Storage	50,000 gallons
10-day Transfer	20,000 gallons, 100 cubic yard

No other RCRA regulated units are located on site.

## Waste Characterization

Indicated below is the waste characterization of the various waste streams managed at the treatment/storage and transfer facilities. Actual waste analysis information on the waste materials will be retained on waste profile, supporting lab analytical, QC lab reports, manifests, land ban forms, and the EQFL computer database.

### **Flammable Liquids**

Physical State:	Liquid
Flash Point:	<140 F
Chemical Composition:	Solvents, paints, thinners, alcohols, fuels, oils, etc.
Other Data:	Facility warehouse storage is in an explosion-proof designed area. Vehicles are placarded and meet all DOT requirements.

Disposal is off-site via fuel blending and/or incineration.

### **Oxidizers/Reactives/Flammable Solids**

Physical State:	Liquid/Solid/Semi-Solid
Chemical Composition:	<u>Oxidizers:</u> permanganates, nitrates, nitrites, perchlorates, etc. <u>Reactives:</u> Cyanides, sulfides, and water-reactive metals <u>Flammable Solids:</u> Water-reactive metals, phosphorous, paint sludges, and solid residues.
Other Data:	Cyanides and sulfides must be kept separate from acids. Oxidizers must be kept separate from organics. Flammable solid/water reactives must be kept dry and usually immersed in kerosene.

Disposal is off-site via deactivation or incineration.

### **Poisons**

Physical State: Liquid/Solid

Chemical  
Composition: Arsenics, carbamates, endrin, lindane, toxaphene,  
methoxychlor, etc.

Other Data: May be an inhalation hazard.

Disposal is off-site via incineration.

### **Corrosives**

Physical State: Liquid/Semi-Solid

PH: Acids 2.0  
Caustics 12.5

Chemical  
Composition: Acids - Hydrochloric, nitric, chromic, phosphoric, sulfuric, etc.  
Caustics - Sodium hydroxide, potassium hydroxide, etc.

Other Data: Keep acids and caustics separated from each other and do not  
add water to acids or caustics.

Disposal is off-site via neutralization.

### **Characteristic and Others**

Physical State: Liquid/Solid/Sludge

Chemical  
Composition: Listed plating sludges, toxic metals (chrome, lead, etc.) D018-  
43 TC wastes

Disposal is off-site via stabilization and landfill.

## **CLOSURE PERFORMANCE STANDARDS**

EQFL plans to continue operating the EQFL permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. This Closure Plan is submitted to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure of the EQFL facility will be done in a manner that minimizes the need for further care. All hazardous waste and hazardous waste constituents will be properly managed at closure so that post closure care and post closure potential for releases of hazardous waste or hazardous waste constituents are eliminated. The EQFL Closure Plan complies with the requirements of 40 CFR 264 Subpart G. It is the intent of this plan to protect human health and the environment from any release of hazardous materials or constituents.

Closure and the closure cost estimate is based upon a third party completely managing and conducting all closure activities.



## **PARTIAL AND FINAL CLOSURE ACTIVITIES**

Final closure activities will include the removal of all hazardous waste and hazardous waste constituents from the facility for shipment to permitted treatment and disposal facilities. Final closure also includes the decontamination of all equipment, the floors inside of the waste management building, the containment sumps, the inside walls of the building (three feet up), and the loading/unloading areas (the paved area from the building to five feet out and the outside of the warehouse dock wall from the ground up to the floor level).

The facility land, office, and decontaminated waste management building will require no post closure care. The facility will then be available for commercial use.

## MAXIMUM WASTE INVENTORY

A maximum total of 50,000 gallons of hazardous waste from the permitted container storage facility will require shipment off-site to treatment or disposal facilities at closure. A maximum total of 20,000 gallons plus 100 cubic yards of hazardous waste from transfer (transporter) operations will require shipment to off-site treatment or disposal facilities at closure. These quantities are summarized below:

<u>Waste Materials</u>	<b>TSDF Maximum Quantity (Gallons)</b>	<b>Transfer Operations Maximum Qty (Gallons)</b>	<b>Total Combined Maximum Qty (Gallons)</b>
Flammable Liquids	7,700	4,400	12,100
Oxidizers	6,655	2,400	9,055
Reactives and Flam. Solids	2,370	1,100	3,470
Other Hazardous Waste	13,310	4,400 100 cu yd	17,710 100 cu yd
Corrosives	13,310	4,400	17,710
Poisons	<u>6,655</u>	<u>3,300</u>	<u>9,955</u>
<b>TOTALS:</b>	<b>50,000 gallons</b>	<b>20,000 gallons 100 cu yd</b>	<b>70,000 gallons 100 cu yd</b>

## CLOSURE ITEMS

The facility hazardous waste inventory will be consolidated as much as possible based upon waste hazard class, compatibility, and treatability. Compatible hazardous waste liquids will be pumped to tankers for outbound shipment to ultimate treatment and disposal facilities. Compatible hazardous waste solids will be consolidated to roll-off or sludge box containers for outbound shipment to ultimate treatment and disposal facilities.

### Waste Inventory

#### Flammable Liquids

All flammable liquids on hand at the time of closure will be removed by vacuum tanker or pump and tanker and transported to a permitted fuel blending facility (or equivalent). A maximum total (from TSDF and transfer operations combined) of 12,100 gallons of waste flammable liquids would be on hand at closure. The 12,100 gallons would be loaded to tankers and transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

#### Oxidizers

All oxidizers on hand at the time of closure will be sent for treatment and disposal. A maximum total (from TSDF and transfer operations combined) of 9,055 gallons of oxidizers would be on hand at closure. The 9,055 gallons of oxidizers would be loaded to trucks and transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

#### Flammable Solids/Reactives

All flammable solids and reactive wastes on hand at the time of closure will be sent to a permitted hazardous waste treatment facility or incinerator (or equivalent) for disposal. A maximum total (from TSDF and transfer operations combined) of 3,470 gallons would be on hand at closure. The 3,470 gallons would be sent in 63 drums to the designated facility. The shipment would be transported by a permitted hazardous waste transporter. Removal would take a maximum of ten (10) days.

## Poisons

All poisonous hazardous waste on hand at the time of closure will be sent in 55-gallon drums to a permitted incinerator (or equivalent). A maximum total (from TSDF and transfer operations combined) of 9,955 gallons of poisons would be on hand at closure. The 9,955 gallons would be loaded to trucks and transported by a permitted hazardous waste transporter. Removal would take a maximum of twenty (20) days.

## Corrosives

All corrosive hazardous waste on hand at the time of closure will be sent to a permitted treatment facility (or equivalent) for treatment and disposal. A maximum total (from TSDF and transfer operations combined) of 17,710 gallons of corrosives would be on hand at closure. The 17,710 gallons of corrosives would be sent in tankers to the designated treatment facility. All acids would be transferred to separate tankers and all caustics would be transferred to separate tankers to avoid commingling acids and caustics to the same tankers. The tankers would be transported by permitted hazardous waste transporters. Removal would take a maximum of forty (40) days.

## Other Hazardous Waste

All other hazardous wastes on hand at the time of closure (such as listed plating sludges, toxic metals, and characteristic D018-43 TC wastes) would be sent to a permitted hazardous waste treatment/disposal facility (or equivalent) for treatment or incineration (or equivalent) and disposal. Liquids may be transferred to tankers and solids would be transferred to 20 cubic yard roll-off boxes. A maximum total (from TSDF and transfer operations combined) of 17,710 gallons and 100 cubic yards of characteristic waste would be on hand at closure. The 17,710 gallons of characteristic wastes would be sent in tankers to the designated treatment/disposal facility. The 100 cubic yards of characteristic wastes would be sent in 20 cubic yard roll-off boxes to the designated treatment/disposal facility. The tankers and boxes would be transported by permitted hazardous waste transporters. Removal would take a maximum of ten (10) days for each set of tankers and roll-off bins (one tanker and one roll-off each per ten days). This would be a maximum of fifty (50) days total.

## Filter Press (Treatment: no longer in service)

The filter press is the only treatment unit at the EQFL facility. The filter press capacity is included in the permitted storage capacity of the facility so no additional waste will be included for closure. The filter press will be cleaned and decontaminated by pumping a dilute muriatic acid solution followed by water through the press. The press will also be cleaned and decontaminated using a pressure washer. All collected rinsates will be managed as hazardous waste with the other facility decontamination rinsates. The press will be sold for any residual value or as scrap metal.

## Other Items

### Empty Containers

All empty containers resulting from the bulking of material will be sent to a drum recycling facility or metal reclamation facility. These facilities will pick up the empties at the EQFL site at no charge.

These empty containers will not meet the criteria for classification as an acutely toxic waste and therefore will not require triple rinsing.

Any empty containers from acutely toxic waste will be managed as hazardous waste or triple rinsed with resulting rinses managed as hazardous waste.

There will be no additional cost to EQFL for the recycling of non-acutely toxic empty containers and therefore no change in the closure cost estimate.

### Equipment

Most of the equipment necessary for decontamination and closure will already be owned by EQFL. Equipment which may require decontamination includes the aerosol unit a forklift, a compactor and a paint can processor.

## DECONTAMINATION

The EQFL storage/treatment and transfer facilities are totally enclosed. The facility construction is concrete and concrete block with containment. The transfer loading and unloading area is concrete and paved with sloped and diked containment. Loading and unloading of waste is direct from trailer to warehouse and direct from warehouse to trailer. Soil sampling will be performed at locations around the site. One soil sample will be taken from the stormwater retention pond. In the unlikely event that releases of hazardous waste or hazardous waste constituents were to occur by the facility, the most likely path of migration would be the stormwater system. The inclusion of two additional samples allows an upgradient sample from the northeast corner of the facility and a downgradient sample from the southeast corner of the facility to be investigated beyond the stormwater retention area. A sample from under the building will also be taken. Additional samples will be taken in any area with visual evidence of contamination.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to a permitted hazardous waste treatment/disposal facility. The floors and sumps will then be decontaminated by steam cleaning. The facility warehouse inner walls will be decontaminated three feet up from the floor. The loading/unloading area will be decontaminated. The loading/unloading area to be decontaminated includes the dock exterior wall from the ground up to the warehouse floor level and the paved ground from the building to out five feet. This liquid will be analyzed for organic solvents and TCLP constituents to determine its acceptability for disposal.

All decontamination will be done and certified by outside contractors. Samples of rinse waters will be taken and analyzed to confirm all washed areas as sufficiently decontaminated.

It is estimated that no more than four weeks will be required to fully decontaminate all equipment and the storage facility itself.

## Closure Certification

Closure certification (as well as all other closure activities) will be conducted by an independent third party.

An independent registered professional engineer licensed within the State of Florida will certify closure of the EQFL hazardous waste facility. It is anticipated that three on-site inspections by the registered professional engineer will occur during the closure period. Those inspections are indicated below:

- |                    |  |
|--------------------|--|
| First Inspection:  | Final date of waste acceptance                       |
| Second Inspection: | Upon completion of all removal for off-site disposal |
| Third Inspection:  | Upon completion of all decontamination               |

It is the intent of these inspections to ensure that all materials are being handled in accordance with our Closure Plan. Upon completion of the final inspection by the registered professional engineer, a certification that closure has been completed will be submitted to the Regional Administrator and Florida DEP. This certification will be sent within 60 days of completion of closure by registered mail.

## **COST ESTIMATE (Combined TSDF and Transfer Operations)**

Indicated below is the most recent closure cost estimate based upon the maximum quantities indicated in the Closure Plan and the methods indicated for treatment and/or disposal.

<u>Flammable Liquids</u>					
Disposal	(12,100 gallons)	x	(\$0.40/gallon)	=	\$4,840

<u>Oxidizers</u>					
Disposal	(165 drums)	x	(\$154/DM)	=	\$25,410

<u>Reactives/Flammable Solids</u>					
Disposal	(63 Drums)	x	(\$300/DM)	=	\$18,900

<u>Poisons</u>					
Disposal	(181 Drums)	x	(\$250/DM)	=	\$45,250



COST ESTIMATE (continued)

Corrosives

Disposal (Caustics)	(8,855 gallons)	x	(\$0.45/gal)	=	\$3,985
Disposal (Acids)	(8,855 gallons)	x	(\$0.54/gal)	=	\$4,782

Characteristics

Disposal (Liquids)	(17,710 gallons)	x	(\$0.70/gal)	=	\$12,397
Disposal (Solids)	(100 cu yds)	x	(\$106/cu yd)	=	\$10,600

COST ESTIMATE (continued)

Closure Disposal Cost Summary (Combined TSDF and Transfer Operations)

Flammable Liquids	\$4,840
Oxidizers	\$25,410
Reactives/Flammable Solids	\$18,900
Poisons	\$45,250
Corrosives	\$8767
Characteristics	\$12,397
	<u>\$10,600</u>
TOTAL CLOSURE DISPOSAL COST (Combined TSDF and Transfer Operations)	<u>\$126,164</u>

## **COST ESTIMATE (TSDF Operations Only)**

Indicated below is the most recent closure cost estimate based upon the maximum quantities indicated in the Closure Plan and the methods indicated for treatment and/or disposal.

### Flammable Liquids

$$\text{Disposal} \quad (7,700 \text{ gallons}) \quad \times \quad (\$0.40/\text{gallon}) \quad = \quad \$3,080$$

### Oxidizers

$$\text{Disposal} \quad (121 \text{ drums}) \quad \times \quad (\$154/\text{DM}) \quad = \quad \$18,634$$

### Reactives/Flammable Solids

$$\text{Disposal} \quad (43 \text{ Drums}) \quad \times \quad (\$300/\text{DM}) \quad = \quad \$12,900$$

### Poisons

$$\text{Disposal} \quad (121 \text{ Drums}) \quad \times \quad (\$250/\text{DM}) \quad = \quad \$30,250$$

COST ESTIMATE (continued)

Corrosives

Disposal (Caustics)	(6,655 gallons)	x	(\$0.45/gal)	=	\$2,995
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Disposal (Acids)	(6,655 gallons)	x	(\$0.54/gal)	=	\$3,594
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Characteristics

Disposal (Liquids)	(6,655 gallons)	x	(\$0.70/gal)	=	\$4,659
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Disposal (Solids)	(33 cu yds)	x	(\$106/cu yd)	=	\$3,498
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Note- Decontamination, Soil Sampling, Closure Reporting and other miscellaneous closure costs, that are in addition to these listed disposal costs, are provided in the worksheets attached to this section.

COST ESTIMATE (continued)

Closure Disposal Cost Summary (TSDF Operations Only)

Flammable Liquids	\$3,080
Oxidizers	\$18,634
Reactives/Flammable Solids	\$12,900
Poisons	\$30,250
Corrosives	\$6,589
Characteristics	\$4,659
	<u>\$3,498</u>
 TOTAL CLOSURE DISPOSAL COST	 <u>\$79,610</u>

## **FINANCIAL ASSURANCE**

EQ Florida Inc. (EQFL), a division of EQ Holding Company, will meet its financial assurance requirements under 40 CFR 264.143 Subpart H Letter of credit guaranteeing payment into a closure trust fund.

After initial submission of financial information, annual updates will be provided (within 90 days) after the close of each succeeding fiscal year. Updated information will consist of the following:

- (i) An inflationary increase in the Letter of Credit held for facility closure.
- (ii) A copy of the current Standby Trust Fund Agreement.
- (iii) A copy of the current Certificate of Liability Insurance.

These documents, along with a Department of Environmental Protection letter of Financial Assurance review, are included as Attachment 12. This information demonstrates compliance with Rule 62-730.300 (2) (b), Florida Administrative Code (F.A.C.) and 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180, F.A.C.

## **SCHEDULE FOR FINAL CLOSURE**

EQFL plans to continue operating the EQFL permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. The schedule for final closure is listed below in the event closure is necessary.

EQFL will notify the FDEP in writing at least 45 days prior to the date which final closure is expected to begin. This date (beginning of final closure) will be no more than 30 days after the receipt of the final volume of hazardous waste.

Indicated below is a list of tasks for final closure of the EQ Florida Inc. storage/treatment facility. These tasks will be performed within a schedule of 90 days from beginning closure activities.

1. Final Waste Acceptance	15 Days
2. Processing Complete	21 Days
3. Offsite Disposal Shipments Complete	30 Days
4. Facility Decontamination Complete	45 Days
5. Soil Sampling and Analysis Complete	60 Days
6. Closure Certification	89 Days
7. Final Date of Facility Closure	90 Days
Total time required to close facility:	90 Days

All hazardous wastes will be removed within 90 days of receiving the final volume of hazardous waste. All closure activities will be complete within 180 days of receiving the final volume of hazardous waste.

## **CERTIFICATE OF CLOSURE**

Within 60 days of the closure of each hazardous waste unit and within 60 days of the final closure of the facility, EQFL will submit to the FDEP, by registered mail, a certification that the facility has been closed in accordance with the EQFL Closure Plan. The certification will be signed by the owner or operator and by an independent registered professional engineer. Documentation supporting the closure certification will be included in this submittal.

The EQFL facility has no disposal units. Therefore, no survey or post closure care is required.

The EQFL Closure Plan will be amended as per the requirements of 40 CFR 264 Subpart G if amendments are necessary.



## CLOSURE SUMMARY

Closure activity quantities and costs are calculated using the following closure worksheets:

CS-1	Container Storage Areas
CS-2	Summary Worksheet
CS-6	Certification of Closure
DC-1	Decontamination Summary
DC-2	Steam Clean / Pressure Wash
SA-1	Sampling and Analysis
SA-2	Sampling and Analysis Summary
SA-3	Borings
SA-3	Analysis
SA-6	Sampling and Analysis
TR-1	Transportation
TD-1	Treatment and Disposal Summary
TD-3	Decontamination Fluids

The following closure worksheets were not applicable or were not utilized:

CS-3	Demolition and Removal No structural demolition or removal is required.
CS-4	Soil Removal No removal of soil is required.
CS-5	Backfill No backfill is required.
DC-3	Sandblasting No sandblasting is required. All decontamination will be done by steam cleaning or pressure washing.
SA-4	Concrete Core Sample No concrete core sampling is required. Core samples will consist of soil cores.
SA-5	Wipe Sample No wipe samples are required.
SA-7	Non-aqueous Sample No non-aqueous sampling is required.

- SA-10                      Subsurface Soil Sample  
No groundwater monitoring wells are required. Therefore, no subsurface soils will be sampled.
- TD-2                        Treatment and Disposal  
Treatment and Disposal cost calculations are shown in the Closure Plan. Therefore, this worksheet was not used.

Two different cost values were calculated for transportation, disposal and total cost of closure cost. The first calculation covers both the TSDF and Transfer Facility operations. The second calculation covers only TSDF operations. Financial Assurances are required only for TSDF operations.

Equipment decontamination will be performed on the aerosol, paint can processor, compactor and forklift. All other equipment is small enough that it could be drummed up and managed as hazardous waste (worst case) if necessary.

Three surface soil bore samples will be obtained and analyzed. The main sample will be from the retention pond. The EPA (HSWA permit) has confirmed that confirmatory sampling and analysis of only the retention pond is sufficient from a SWMU and HSWA permit standpoint. Upgradient, downgradient and quality control samples will be taken and analyzed also for a total of four samples.

Analysis includes full TCLP, 624, 8240, and 8260. This covers all characteristic waste as well as many solvents.

Additional tanker loads are included in the transportation worksheet calculations to keep incompatible hazard class loads separate as follows:

<b>CATEGORY</b>	<b>TSDF OPERATIONS ONLY</b>	<b>TSDF &amp; TRANSFER FACILITY OPERATIONS COMBINED</b>
Flammable	2 loads	2 loads
Corrosive (Acid)	1 load	2 loads
Corrosive (Alkaline)	1 load	2 loads
Characteristic	<u>1 load</u>	<u>3 loads</u>
<b>TOTAL</b>	<b>5 loads</b>	<b>9 loads</b>

Treatment and disposal costs were calculated in the closure plan instead of using worksheet TD-2.

Total cost of Closure is \$238,641.70 (for TSDF operations only) with inflationary increases to date. The current Letter of Credit of \$240,000 exceeds this cost and provides for the July, 2004 increase of 1.015%.

**HAZARDOUS WASTE CONTINGENCY / EMERGENCY RESPONSE  
PLAN**

**FOR**

**EQ FLORIDA, INC.**

2002 North Orient Road  
Tampa, Florida 33619

**FLD 981 932 494**

## **HAZARDOUS WASTE CONTINGENCY/ EMERGENCY RESPONSE PLAN (Contents)**

### General Information

- Introduction

- Purpose

- Implementation

### Coordination Arrangements

### Emergency Notifications

### Emergency Equipment

### Evacuation Plan

### Copies of Contingency Plan

### Amendments of Contingency Plan

### Emergency Coordinator

### Emergency Procedures and Facility Personnel Actions

- Communications

- Identification of Hazardous Materials

- Hazard Assessment

- Release, Fire, or Explosion

- Containment and Control Measures

- Post-Emergency Operations

- Post-Emergency Assurances

## **8. CONTINGENCY PLAN AND EMERGENCY PROCEDURES**

### **GENERAL INFORMATION**

#### **Introduction**

EQ Florida, Inc. (EQ) operates a hazardous waste storage, treatment, and transfer facility at:  
2002 North Orient Road  
Tampa, Florida 33619  
FLD 981 932 494

The facility is located on 1.4 acres (M.O.L.) of land on Orient Road. EQ also has 3.06 acre(MOL) adjacent (contiguous property) to the hazardous waste permitted site. The actual storage and treatment area is located within a 5,866 square foot building. The building is divided into three (3) Bays. Each of the bays has front and rear exits, spill containment sumps, safety and fire alarms and equipment. The equipment and systems are described in other sections this Plan. A site layout is included in Attachment 8.1.

The facility is designed to minimize the potential for any release of hazardous wastes or constituents. Vehicles are able to load and unload directly to and from the warehouse. Virtually any potential release would be contained by the warehouse and its sumps, or within the vehicle. The vehicle transfer area is sloped and diked for containment. Waste materials are segregated by hazard class to insure that no incompatible wastes are stored together. All flammable materials are stored in a separate Bay designed solely for that purpose. The building is fully sprinkled. The flammable storage area has an automatic foam fire suppression system. The building has both smoke and flame detectors which are continuously monitored. A lower explosion limit (LEL) system is located in the flammable area. An automatic ventilation system is activated at 20% of the LEL. The automatic foam fire suppression system, fire alarm, and monitoring service emergency call to the Tampa Fire Department are activated at 30% of the LEL.

Fire extinguishers and fire hoses are located throughout the facility. Safety equipment, proximity suits, SCBA and material handling equipment are located at the site. Emergency safety equipment is listed in Attachment 15 and shown on Attachment 8.2. Hazardous materials potentially on-site may include: acids; alkalis; poisons; flammables; combustibles; oxidizers; reactives; and other regulated solids or liquids which do not fall into these classifications. Most will be present in small quantities or in diluted concentrations when compared to the original raw material. No regulated radioactive, pathological, or explosive materials will be located at this facility. A daily inventory of all materials stored at this facility is readily available.

All operations personnel at this site are trained in emergency response, hazardous waste operations, fire fighting procedures, emergency first aid, and CPR.

#### **Purpose**

The purpose of this plan is to provide EQ employees and responding agencies with an organized procedure for responding to unusual occurrences or emergencies involving hazardous chemicals and/or wastes when such releases could cause potential harm to human health or the environment. This plan is designed to present as simply as possible the necessary steps required in an emergency.

Emergencies covered under this procedure are fires, explosions, floods, hurricanes or unplanned sudden and non-sudden release into the environment of hazardous waste including liquids, vapors and particulates which could cause harm to human health or the environment.

**Implementation**

This Contingency Plan will be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater at the facility, which could threaten human health or the environment.

**COORDINATION AGREEMENTS**

The City of Tampa Fire Department, Tampa HAZMAT Team, Tampa Police Department, Emergency Medical Services, U.S. Coast Guard, Florida DEP, hospitals (Tampa General and Brandon Hospitals) and an outside spill response contractor have been notified as to the operation of this facility. All agencies have been invited to inspect the site and become aware and familiar of waste locations, access, on-site emergency equipment, and available fire protection items. A copy of the contingency plan has been sent to these organizations.

## EQ Florida, Inc. Contingency Plan

### Emergency Response Coordinators:

	Coordinator	Primary Alternate	Secondary Alternate
<b>Name</b>	Robert Mulholland	Stuart Stapleton	Larry Sinatra
<b>Address</b>	1417 Butch Cassidy Tr.	619 Cedar Grove Dr.	804 E. Virginia Ave.
<b>City, State, &amp; Zip</b>	Wimama, FL 33598	Brandon, FL 33511	Tampa, FL 33603
<b>Work Phone #</b>	813-319-3410	813-319-3423	813-319-3418
<b>Home Phone #</b>	813-642-8347	813-412-2302	N/A
<b>Pager #</b>	N/A	N/A	N/A
<b>Mobile #</b>	813-205-4327	813-625-4225	813-598-0514

All emergency Coordinators and Alternates have authority to commit corporate funds during an emergency incident involving a fire, explosion, or release of hazardous waste(s) and or constituents to the air, soil, surface water, or ground water at the facility which could threaten human health or the environment.

**Poor Original**

### Agency Notification:

Agency	Emergencies Notified For:	Telephone #
Tampa Fire Department	Any Potential fire or explosion	911 (Emergencies) 813-232-6800
Tampa Hazardous Materials Team	Any HAZMAT Contingency Plan incident	911 (Emergencies) 813-232-6800
Tampa Police Department	Any evacuation, traffic or security issue	911 (Emergencies) 813-231-6130
Emergency Medical Service	Any Medical Emergency	911 (Emergencies) 813-274-7005
Florida Department of Environmental Protection (FDEP)	All Contingency Plan incidents	850-413-9911(24hr) 850-245-8705
National Response Center (NRC)	All reportable spills or releases	800-424-8802(24hr)
Florida DEP SW District	All Contingency Plan incidents	813-632-7600
EQ- EQ Florida, Inc.	All Contingency Plan incidents	813-623-5302 800-624-5302(24hr)
Brandon Hospital	Any medical emergency	911 (Emergencies) 813-681-5551
Tampa General Hospital	Any medical emergency	813-844-7000
Hillsborough County Environmental Protection Comm.	All Contingency Plan incidents	911 (Emergencies) 813-627-2600
EPA Region IV	Any evacuation, traffic or security issue	404-562-8705(24hr) 404-562-8700
City of Tampa – Storm water	If potential for contamination	813-259-1693 813-622-1901
Clark Environmental	If additional Resources are needed	863-425-4884
Roche Bail Bonds (neighboring business)	Any evacuation, traffic or security issue	813-623-3355



## EMERGENCY EQUIPMENT AND COMMUNICATIONS SYSTEMS

This chapter describes the emergency equipment and alarm systems at the EQ facility. This equipment is listed in Attachment 15.

### Emergency Equipment

1. **Fire extinguishers** located throughout the building and prominently identified by signs and red markings. ABC extinguishers are located in Bays 1 and 3. Halon and metal-x extinguishers are located in the flammable storage area (Bay 2).
2. **Hazorb (or equivalent) sorbent** used to absorb any chemical spill. Located in bags identified by name in Bays 1 and 3.
3. **Oil-Dri** and **Vermiculite** are used for solvent and oil spills. Located in bags identified with the words Oil-Dri or Vermiculite.
4. **Calcium carbonate** and **lime** are used to neutralize acids. Located in bags identified by the words Calcium Carbonate or Lime.
5. **Citric Acid** is used to neutralize alkalines. Bags are identified by the words Citric Acid.
6. **Spill control/sorbent booms** used to contain any spill. Spill control booms are available in various lengths.
7. **Protective Clothing** including PVC suits and polyethylene splash suits. PVC suits are rubberized suits while the splash suits are polyethylene coated paper clothing. Protective Suits are available in Levels A through D.
8. **Full-face respirators, air-line respirators** and **SCBA** are available for respiratory protection.
9. **Gloves, boots, face shields, goggles** and **hard hats** may be used as protective equipment.
10. **Plug and dike sealant** used to seal leaking containers.
11. Air powered **pumps with hose** for removal of liquids or water. Identified by lack of electrical connection.
12. **Manual pump** for removal of any flammable liquids.
13. **Drum pumps** for removal of any containerized liquids. Pumps are capable of fitting inside of a drum bung.
14. Compressed air cylinders to be used in conjunction with air supplied respirators. Cylinders marked with the words **Breathing Air**.
15. **Shovels, brooms, buckets, mops, tools, bung wrenches**, etc.
16. **Telephones** located on the north and south walls of the main storage area and in the office area.
17. Empty **DOT-approved containers**.
18. Empty **85 and 110 gallon overpack drums** for recontainerizing damaged or leaking containers.

19. An **emergency shower** is located in the processing and storage areas (Bay 1). **Eye wash systems** are located in the building (Bays 1 and 3).
20. **Flame and smoke detectors** are located in the flammable storage area. **Lower explosive limit (LED)** monitors are located in the flammable storage area and smoke detectors are available in the general storage area.

Empty drums, oil dri, vermiculite and sorbent boom are located in materials storage trailers. The fire extinguishers are on the walls and identified by red markings and the sign "Fire Extinguisher".

### **Communications Systems**

1. **Air horns** are located throughout the hazardous waste storage area. In case of a spill, explosion, or other emergency, these can be used to alert all employees that evacuation is necessary.
2. An **intercom system** for verbal notification is located throughout the building. Non-evacuation commands are to be given over the intercom.
3. Twenty-four hour **monitored alarms** are located throughout the facility.
4. **Mobile phones** are available at the facility.
5. **Telephones** are available at the facility.

### **EVACUATION PLAN**

POTENTIALLY TOXIC GASES AND VAPORS MAY BE PRESENT IN ANY INCIDENT INVOLVING HAZARDOUS MATERIALS.

1. Notification to evacuate the EQ facility in an emergency would be handled by one of several methods. These are:
  - a. Emergency air horns are located throughout the facility and are sounded when evacuation is necessitated.
  - b. An intercom system is also located throughout the facility and can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
  - c. Pull alarms are located throughout the facility.
  - d. Phones are available throughout the facility.
  - e. Mobile phones are also available at the facility.
2. In the event of an emergency situation (spill, fire, explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms located throughout the building.
3. All personnel are to evacuate the facility. The evacuation routes are shown in Attachment 5.9. The primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed.

## **COPIES OF CONTINGENCY PLAN**

A copy of the Contingency Plan is maintained at the facility. Key personnel such as Emergency Response Coordinators and Alternates have copies of the Contingency Plan.

Copies of the Contingency Plan have been submitted to Tampa Police, Tampa Fire, Tampa Hazmat, Emergency Medical Services, US Coast Guard, Florid DEP, hospitals (Tampa General and Brandon). Documentation of this submittal is included in the Contingency Plan.

## **AMENDMENTS OF CONTINGENCY PLAN**

The EQ Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

1. The EQ facility permit is revised;
2. The plan fails in an emergency;
3. The facility changes design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
4. The Emergency Coordinators list changes, or
5. The emergency equipment list changes.

## **EMERGENCY COORDINATOR**

At all times, there will be at least one employee either at the facility or on call with the responsibility for coordinating all emergency response operations. The coordinator and alternates are thoroughly familiar with all aspects of the EQ Contingency Plan, all facility operations, the location and characteristic of wastes managed, the location of facility records, and the facility layout. The EQ Emergency Response Coordinator and Alternates have the authority to commit the resources needed to carry out the EQ Contingency Plan.

## **EMERGENCY PROCEDURES AND FACILITY PERSONNEL ACTIONS**

### **Communications**

The purpose of this section is to establish the organizational structure which will be in force during a response to a chemical emergency and what procedures will be utilized to notify corporate officials, outside response teams, local government authorities, and State and Federal Regulatory Agencies.

#### **Internal Communications**

In the event of an emergency situation involving hazardous chemicals or wastes, the personnel listed shall be responsible for coordinating the necessary response and/or cleanup.

EQ management is to be notified immediately upon discovery of an emergency situation involving hazardous chemicals or wastes.

EQ Florida, Inc.  
2002 North Orient Road  
Tampa, FL 33619  
813-623-5302 or 800-624-5302

Management will notify, via telephone, radio, mobil telephone or pager, the required EQ personnel for response to the scene. EQ emergency response vehicles are equipped with necessary cleanup/safety materials and first aid supplies. Trailers, sheds, and lockers on site also contain safety equipment and supplies.

#### **External Communications**

In any emergency situation, contact the following:

1. Tampa Fire Department (**911**). Indicate the extent and type of emergency which exists (fire, spill, etc.).
2. In the event of emergencies involving chemical spills, leaks, or explosions (which may require additional assistance), at the direction of the EQ Emergency Coordinator/Alternate a spill response contractor can be notified, such as:

Clark Environmental Inc. @ 863-425- 4884

## Government Agency Notification

In the event of an emergency where environmental contamination is eminent, in addition to notifying the Tampa Fire Department (**911 emergencies**), the following governmental agencies will be notified by the EQ Emergency Coordinator/Alternate.

- |   |  |
|---|--|
| 1. Florida Dept. of Environmental Protection<br>850-245-8705 (normal working hours)<br>850-413-9911 (24 hour) | 4. U. S. Coast Guard<br>Tampa Marine Safety Division<br>813-228-2189 |
| 2. National Response Center (NRC)<br>800-424-8802   | 5. Hillsborough County<br>Solid Waste Department<br>813-272-5680     |
| 3. Florida DEP<br>Southwest District<br>Tampa, Florida Office<br>813-632-7600 (normal working hours)          | 6. Florida Fish and Wildlife<br>813-558-5050                         |
|   | 7. City of Tampa Fire & HAZMAT<br>813-232-6800<br>911 Emergencies    |

In addition to the NRC, the government official designated as the DEP On-Scene Coordinator (OSC) must be contacted. This can be accomplished by calling 850-488-1320.

The following information will be communicated to the governmental agencies contacted.

1. Name and telephone number of the reporter.
2. Name and address of the facility.
3. Time of the incident.
4. Type of incident (whether fire, explosion, or release).
5. Name of the material released.
6. Quantity of the material released.
7. Additional information such as liquid, vapor, or solid.
8. Type of incident (release from drum, tank, truck, or warehouse).
9. Extent of injury or injuries, if any.
10. Possible hazards to human health or the environment, outside the facility.
11. Weather conditions (wind direction, rain, etc.).
12. Potential for release or spill of material into surface waters.

Within 15 days of any incident the facility manager will notify, in writing, the Regional Administrator that the Contingency Plan has been implemented. All of the aforementioned items will be addressed as well as the quantity and disposition of all recovered materials resulting from the incident.

## Identification of Hazardous Materials

Warehouse Bay 1 (North Bay)

1. Acids
2. Toxic Organics and Metals
3. Non-flammable solvents and halogens
4. Asbestos

**Warehouse Bay 2 (Center)**

1. Flammable liquids and solids
2. Reactive cyanides, sulfides, and metals

**Warehouse Bay 3 (South Bay)**

1. Poisons
2. Oxidizers
3. Caustics
4. Non-Regulateds

The warehouse doors (west / front side) are placarded with the hazard class of the material stored in that particular Bay.

**Office/Lab**

Satellite accumulation (5 gallon or less) of flammable, corrosive, chemical rags, and battery wastes.

**Transfer Facility Vehicles (Located in the vehicle loading and unloading areas)**

1. Trailers
2. Box Trucks
3. Vans
4. Tankers
5. Roll-Offs

All vehicles containing hazardous waste are placarded and manifested per DOT and RCRA requirements. The placards will identify the hazard class of each trailer, roll-off, tanker, or vehicle.

**Processing Equipment**

1. Aerosol Recycling Unit
2. Paint Can Crusher
3. Drum Crusher
4. Fluorescent Bulb Crusher
5. Transfer Pumps (portable air, electric, and manual)

The above processing equipment operates on a batch mode. The equipment will be shut off and disconnected when emergency situations occur. Waste containers in process will be closed when the equipment is shut down for an emergency.

Approximately 1/3 of the waste managed at the facility is non-hazardous or non-regulated. These containers and vehicles can be identified by a blue "Non-Regulated Waste" DOT label. The material presents **no hazard** (such as poison, flammable, corrosive, reactive, oxidizer) if the container does not have a DOT label. However, any release must be contained to prevent a release which may potentially contaminate waters or soils.

Several trailers may be at the facility which do not contain hazardous or non-hazardous wastes. These trailers may be empty, contain new empty drums, contain used empty drums for recycling, or contain safety equipment and supplies. No potential hazard is associated with these vehicles.

The emergency response coordinator or alternate will coordinate the identification of hazardous materials involved in an emergency incident requiring implementation of the contingency plan. A complete inventory of all waste materials is available at the facility. The identification can be narrowed by the source of the incident. For example, if an incident occurred in Bay 2 of the warehouse, the materials would be limited to flammables and reactives. All containers are identified by a unique EQ identification number, DOT hazard class labels, and hazardous waste shipping labels. The contents of any container can be fully characterized if the EQ identification number is known. EQ has an on-site laboratory and HAZCAT identification kit available should it be necessary to characterize a sample of a potential hazardous material. The coordinator or alternate is therefore able to identify the source, characteristics, amount, and extent of any released materials, by observations, review of facility data, records and shipping documents, or by chemical analysis.

#### Hazardous Materials Emergency Response References

The following is a list of references available at EQ:

1. CHRIS - HAZARDOUS CHEMICAL DATA, Department of Transportation/U.S. Coast Guard.
2. HAZARDOUS MATERIALS EMERGENCY RESPONSE GUIDEBOOK, Department of Transportation/DOT P 5800.2.
3. MERCK INDEX.
4. HANDBOOK OF HAZARDOUS MATERIALS, Sax.
5. NFPA 101 LIFE SAFETY CODE.
6. CANCER CAUSING CHEMICALS, Sax.
7. TOXIC ORGANIC CHEMICALS, E. Ellsworth Hackman III.
8. NIOSH REGISTRY OF TOXIC EFFECTS OF CHEMICAL SUBSTANCES.
9. EMERGENCY FIRST AID, American Red Cross.
10. CONDENSED CHEMICAL DICTIONARY, Hawley.
11. HAZARDOUS MATERIALS, SUBSTANCES, & WASTES COMPLIANCE GUIDE.

## **Hazard Assessment**

The emergency response coordinator or alternate will assess the potential hazards to human health or the environment that may result from a release, fire, or explosion of hazardous waste or hazardous waste constituents. The assessment will consider both direct and indirect effects of the release, fire, or explosion.

The contingency plan will be implemented whenever the emergency coordinator/alternate determines an imminent or actual hazard exists which could threaten human health or the environment. This section provides the criteria used by the emergency coordinator/alternate in making the decision to implement the contingency plan.

### **Fire or Explosion**

For incidents involving a fire or explosion, the following situations will result in contingency plan implementation:

- a. A fire which could cause the release of toxic fumes.
- b. A fire which could spread and possibly ignite other materials or which could cause heat-induced explosions.
- c. A fire which could spread to off-site areas.
- d. The use of water or chemical fire suppressants which could result in contaminated runoff.
- e. The imminent danger of an explosion which could result in a safety hazard due to flying fragments or shock waves.
- f. The imminent danger of an explosion which could result in the release of toxic materials.
- g. The occurrence of any explosion.

### **Fire Fighting Procedures**

The EQ facility is equipped with both smoke and flame detectors. Both are monitored on a twenty-four hour per day basis. If either are activated, the sprinkler and/or foam systems will automatically engage. The Tampa Fire Department is notified automatically by the continuous alarm/monitory system.

Also included in the monitoring system is a lower explosive limit (LEL) detector within the flammable storage area. There are two detectors. One is mounted in the spill sump to detect vapors which are denser than air. The second is mounted on the ceiling to detect vapors less dense than air. If vapors in the flammable area exceed 20% of the lower explosive limit, the ventilation system will automatically engage. If the LEL reaches 30%, the sprinkler and foam systems will be activated automatically. The Tampa Fire Department is notified automatically at 30% LEL.

Located throughout the facility are fire extinguishers for Class A, B or C fires. Located in the flammable area are Halon extinguishers (or equivalent). Fire hoses are located throughout the building.



In the event of a fire, the following activities will be performed:

1. Notify other employees. If evacuation is necessary, sound the air horns and alarms.
2. Notify the Tampa Fire Department (911).
3. Move all transport vehicles away from the loading or unloading areas.
4. Control the fire with extinguishers if it can be done safely.
5. The facility is designed for minimal manual fire suppression.
6. Notify necessary agencies as indicated.

### **Unplanned Material Release**

The contingency plan will be implemented for any release to the environment which results in one or more of the following conditions:

- a. A spill which could result in the release of flammable liquids or vapors, thereby causing a fire or explosion hazard.
- b. A spill which could cause the release of toxic liquids or fumes.
- c. A spill which could be contained on the site, but which could potentially result in groundwater contamination.
- d. A spill which cannot be contained on the site resulting in off-site soil, groundwater, or surface water contamination.
- e. Any flooding of the site which could result in surface water contamination.

### **Personal Protective Equipment**

In order to provide adequate protection from hazardous exposures, personal protective equipment must be used. The following indicates various hazardous situations and the personnel protective equipment which is required.

#### **Personal Protective Equipment Required for Hazardous Situations -- Level A Protection**

##### Hazard Involved

- ° Situations immediately dangerous to life and health.
- ° Oxygen deficient atmospheres.
- ° Unknown hazardous materials.
- ° Chemicals which can be absorbed through the skin.
- ° Materials which cannot be removed with an air purifying respirator.

##### Required Personal Protective Equipment

- ° SCBA or air line respirator with SCBA escape air system.
- ° Full body encapsulation suit

## Personal Protective Equipment Required for Hazardous Situations - Level B Protection

### Hazard Involved

- ° Oxygen deficient atmosphere where chemical composition of the material is known and falls into the classification of an irritant.

### Required Personal Protective Equipment

- ° SCBA or air line respirator with SCBA for emergency use.
- ° PVC splash suit with hood.
- ° Neoprene/nitrile/butyl rubber arm length gloves.
- ° Steel-toed rubber boots.

## Personal Protective Equipment Required for Hazardous Situations - Level C Protection

### Hazard Involved

- ° Situations not immediately dangerous to life and health.
- ° Sufficient oxygen present to support life.
- ° Irritant or corrosive chemicals.
- ° Contaminated soils.
- ° Liquid/solvents not immediately dangerous to life and health.

### Required Personal Protective Equipment

- ° Full face mask with air purifying (cartridge) respirator; or, half face (cartridge) respirator with goggles and face shield.
- ° PVC splash suit.
- ° Protective gloves (type dependent on chemical being handled).
- ° Steel-toed rubber boots.

## Personal Protective Equipment Required for Hazardous Situations -- Level D Protection

### Hazard Involved

- ° Situations which contain no immediate hazard but where there is the potential for accidental release of a hazardous substance.

### Required Personal Protective Equipment

- ° Half face air purifying (cartridge) respirator.
- ° Safety goggles.
- ° Disposable coveralls.
- ° Surgical rubber gloves or suitable hand protection. Rubber boots.
- ° Steel-toed shoes.

## Containment and Control Measures

The purpose of this section is to alert all emergency response groups, regulatory agencies and affected parties, as to the location of the hazardous waste storage areas within the facility, the design of containment control, and the procedures to be followed in response to emergencies. **It must be understood that potentially toxic gases and vapors may be present in any incident involving hazardous materials.**

### Employee Response

1. Notification to evacuate the EQ facility in an emergency would be handled by one of several methods. These are:
  - a. Emergency air horns are located throughout the facility and are sounded when evacuation is necessitated.
  - b. An intercom system is also located throughout the facility and can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
  - c. Pull alarms are located throughout the facility.
  - d. Phones are available throughout the facility.
  - e. Two-way radios are available at the facility.
  - f. Most hazardous waste operations employees have pagers.
  - g. Mobile phones are available at the facility.
2. In the event of an emergency situation (spill, fire, explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms located throughout the building.
3. All employees are to don the necessary protective equipment including self-contained breathing apparatus (SCBA). This equipment is located in the safety equipment cabinets in Bay 3 of the facility, in the storage room in the office, and on the safety equipment and supply trailer. Additional safety equipment is provided in these locations. A complete outline of required safety equipment for various situations is included in Attachments 8.2 and 15. Attachment 8.2 indicates the location of safety equipment.
4. Fire fighting or spill containment should begin immediately under the direction of the facility manager/supervisor until the EQ Emergency Coordinator/Alternate arrives on-site. Procedures are identified later in this chapter. Refer to the CHRIS Manual for additional information.
5. The facility supervisor is to contact the EQ Emergency Coordinator/Alternate immediately (telephone numbers are listed).
6. In the event of a fire or explosion, the sprinkler and foam systems will be automatically activated. Both the alarm and sprinkler system are monitored on a 24-hour basis. When the alarm or sprinklers are activated, the Tampa Fire Department will be notified immediately and automatically.
7. Electric service to the building should be shut off in the event of a fire or explosion. The main electric shut off is located on the outside south wall of the container storage building. No additional process systems, valves, gauges or equipment are required to be monitored or shut down since no potentially dangerous processes are employed at the facility.

8. All waste handling or processing in the affected area will be stopped immediately.
9. All waste feed lines and waste processing equipment will be shut down when this can be done safely. There are no continuous treatment processes. All treatment is on a batch basis. Power outages will simply make these processes inoperable.
10. In situations immediately dangerous to life and health (IDLH), evacuation of the facility may be necessary. This decision will be made by the Emergency Coordinator/Alternate or facility supervisor. If the evacuation occurs, the primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed. Both routes are prominently outlined at the facility and are included with this plan.

### **Entrance Procedures**

The following procedures are to be followed by all response personnel before entering the hazardous waste storage areas in emergency situations:

1. Consult the attached facility drawing which indicates both types and locations of materials which would be stored in the area to be entered. A general description of these areas is included in the next section.
2. Assume toxic/hazardous materials are present in the area. A complete inventory is kept in the office area.
3. Select proper protective gear, including SCBA.
4. Consult DOT P 5800.2 HAZARDOUS MATERIALS EMERGENCY RESPONSE GUIDE BOOK which is in the office area.

Remember, the primary responsibility during initial emergency response efforts is to save lives and protect the environment.

### **Spill or Release Response Procedures**

In the event of a spill, certain procedures must be instituted immediately. The facility is designed so that the rupture of containers would result in no release of contaminants outside of the facility.

The storage area for acidic and alkaline wastes are segregated to insure that no co-mingling of these materials will results.

All flammable/combustible materials are stored in a separate Bay.

All incompatible materials have separate containments.

Immediately contact all required individuals/agencies indicated on Chapter 1 of this document. These telephone numbers are posted at all facility telephones.

Should a spill or release occur, the following steps are to be taken:

1. Sound an alarm to notify an emergency.
2. Don protective equipment located in safety cabinets.
3. Contact EQ Emergency Coordinator/Alternate.
4. The source of the spill/release will be determined and corrected.
5. Waste handling or processing in the affected area will be stopped immediately.
6. All waste feed lines and waste processing equipment will be shut down as soon as this can be done safely.
7. All non-response personnel will leave the area immediately.
8. All injured persons will be removed from the area and treated by qualified medical personnel.
9. Contain the spill with either sorbent boom, sorbent pillows, or bulk sorbent material. All sorbents and booms are stored in the spill control storage area.
10. In the event of an acid spill, use calcium carbonate or lime to neutralize the spill.
11. Use citric acid to neutralize alkaline spills.
12. Once the spill has been contained, begin cleanup.
13. Contact the response contractors listed in and request mobilization of personnel or equipment, if necessary.
14. The emergency coordinator/alternate will contact all required agencies.
15. Note the discharge in the operating record.
16. A complete list of response action for specific chemical spills is included.
17. If immediate evacuation of the building is required, two 5-minute egress bottles are attached to the supplied air system. Additional respiratory and personal protective clothing are located in the safety equipment cabinet located in Bay 3 of the facility.
18. In the event that a release outside the facility leads to surface water, groundwater or soil contamination, EQ will contact the contractors listed or other suitable contractor for all required remediation efforts.

### **Care of the Injured**

The objective is to provide first aid or immediate care for a person who has been injured, or has been suddenly taken ill, in the event of an emergency.

All facility employees of EQ shall have been trained in standard first aid and cardiopulmonary resuscitation (CPR) programs offered and presented by the American Red Cross.

First aid kits will be located in the office area.

In the event of an emergency, the EQ facility manager shall be in charge until the arrival of the Emergency Coordinator/Alternate.

All injured shall be taken to Brandon Hospital or Tampa General Hospital by the local ambulance service. These hospitals will have been notified as to the type of injuries which may result at our facility. Routes to the hospitals are included in Attachment 5.10. The nearest life squad is the City of Tampa. They can be contacted by dialing 911.

Contact Tampa General or Brandon Hospital. Inform them of the extent of the emergency and what injuries to expect.  
Implement emergency first aid as required.

## **Post-Emergency Operations**

### **Decontamination Procedure**

After an emergency incident, decontamination of equipment is required. All expendable items, such as sorbent, booms and so on are to be placed into 55 gallon drums and disposed as required by state and federal law. Non-expendable items such as tools, chemical suites and material handling equipment are to be cleaned in an appropriate solvent and placed back in their normal location. The suitable solvent will be determined by a EQ senior chemist. Disposal of the spent solvent will comply with applicable regulations.

All tanks and containerized waste will be thoroughly inspected for leaks, pressure build-up and structural integrity by the site supervisor. Any deficiencies will be immediately corrected.

Air monitoring will be performed as required to insure the facility is safe to resume normal operations.

A complete list of all available emergency equipment is included in Attachment 15. Specific decontamination solutions are included in this Contingency Plan.

Operations at the facility will not commence until such time as all emergency equipment has been cleaned, replaced and restored to its original location. All emergency equipment will be tested to determine its effectiveness prior to resuming operation after an emergency incident.

### **Re-Entry Monitoring**

Before employees are allowed to return to the area after an emergency, the on-site Emergency Coordinator/Alternate will confirm the area is safe for re-entry. This will be accomplished by physical inspection of the area, the use of detection equipment, followed by decontamination as necessary. Chemical detection equipment available to the Emergency Coordinator/Alternate is as follows:

1. Chemical detector tubes - Draeger, MSA.
2. Explosion meter.
3. Portable Organic Vapor Analyzer (OVA).
4. Portable pH/specific ion meter.
5. Hazcat Kit.
6. A fully equipped environmental laboratory is located nearby. Any wet chemical or instrumental analyses can be performed as required.

Note-These items are located in the office area.

## **Decontamination Procedures**

### **Inorganic/Organic Acids**

Prepare mixture of 10% sodium carbonate or 10% hydrated lime or 10% trisodium phosphate in water; clean items/area with mop or cloth. Wear protective equipment.

### **Alkalai (Caustics)**

Prepare mixture of 5% acetic acid (vinegar) or 5% citric acid in water; clean items/area with mop or cloth. Wear protective equipment.

### **Oils and PCB**

Methylene chloride or isooctane applied directly to the contaminated area. Remove solvent and contaminant with sorbent or absorbent cloths. Wear protective equipment.

### **Alkalai and Alkaline Earth**

Metals (sodium, potassium, phosphorus)

Cover immediately with dry soda ash (sodium-carbonate) and remove with broom and shovel. Keep dry; do not contact with water. Wear protective equipment.

### **Solvents**

Cover with absorbent material as quickly as possible. Remove with broom and shovel. Wear protective equipment.

### **Mercury**

Recover as much bulk Mercury as possible. Cover the spill area using Mercsorb, HgX or equivalent. Spray with water to activate the material. Wear protective equipment. Keep area well ventilated.

## **Emergency Waste Movement Coordination**

In the event of an emergency situation where the movement of waste materials is required, the following procedures are to be employed:

1. Contact the emergency response coordinator or alternate.

2. Contact EQ and/or subcontract drivers.
3. Perform waste characterization verification as described in the EQ Waste Analysis Plan.
4. Contact Florida DEP- Emergency Response Group, and the District Office in Tampa to inform them of the emergency waste movement.
5. Load waste into drums, tankers, roll-off containers, or other suitable containers.
6. Load the containers to the vehicles. Follow all applicable DOT regulations pertaining to placarding, labeling, and loading.
7. Complete all shipping documents as required.
8. Dispatch waste shipments to secondary approved permitted waste treatment or disposal facilities.

### **Post-Emergency Assurances**

No waste material that may be incompatible with any released material will be treated or stored in the portion of the facility where any release occurred until cleanup procedures are complete. All emergency equipment listed in this Contingency Plan will be cleaned and fit for its intended use before hazardous waste management operations are resumed. Inoperable emergency equipment will be serviced, repaired, or replaced.

#### **Post-Emergency Documentation**

##### **1. Operating Record**

EQ will note in the facility operating record the time, date, and details of any incident that requires implementing the EQ Contingency Plan.

##### **2. Reporting**

EQ will submit a written incident report to the Regional Administrator within 15 days after any incident requiring implementation of the EQ Contingency Plan. The report will include the following information:

1. Name, address, and telephone number of EQ's contact (operator);
2. Name, address, and telephone number of EQ facility;
3. Date, time, and type of incident;
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of hazards to human health or the environment, if applicable; and the estimated quantity and disposition of any recovered materials which may result from the incident.





**62-730.170 Standards Applicable to Transporters of Hazardous Waste.**

(1) The Department adopts by reference 40 CFR Part 263 revised as of July 1, 2007.

(2) In addition to the requirements of subsection (1) of this rule, no person shall transport a hazardous waste within the state for which either a manifest is required under 40 CFR Part 262 [as adopted in subsection 62-730.160(1), F.A.C.] or a reclamation agreement is entered between a generator and recycler pursuant to 40 CFR 263.20 [as adopted in subsection 62-730.170(1), F.A.C.] unless compliance with the following special requirements have been demonstrated.

(a) The transporter shall have and maintain financial responsibility for sudden accidental occurrences in a minimum amount of \$1,000,000 per occurrence for combined coverage of injury to persons and for damage to property and the environment from the spillage of hazardous waste while such wastes are being transported including the costs of cleaning up the spill. Such financial responsibility shall be issued by an agent or company authorized or licensed to transact business in the State of Florida. Such financial responsibility shall be maintained at all times, be exclusive of legal defense costs, and be established by any one or a combination of the following:

1. Evidence of casualty/liability insurance on an occurrence basis with or without a deductible. With the deductible the Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. Each insurance policy must be evidenced by a certificate of liability insurance or amended by attachment of an endorsement.

2. Surety bonds.

(b) Evidence of coverage shall include submittal of an originally signed copy of one or more of the following forms, which are hereby adopted and incorporated by reference:

1. Hazardous Waste Transporter Certificate of Liability Insurance, Form 62-730.900(5)(a), effective date January 29, 2006.

2. Hazardous Waste Transporter Liability Endorsement, Form 62-730.900(5)(b), effective date January 29, 2006

3. Hazardous Waste Transporter Liability Surety Bond, Form 62-730.900(5)(c), effective date January 29, 2006.

Rule 62-730.900, F.A.C., contains information on obtaining a copy of these forms.

(c) The insurance policy, including all endorsements, or the liability surety bond must be maintained at the carrier's principal place of business.

(d) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection, the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.

(e) The transporter shall annually submit to the Department two originally signed Transporter Status Forms, Form 62-730.900(5)(d), effective date January 5, 1995, which is hereby adopted and incorporated by reference. Rule 62-730.900, F.A.C., contains information on obtaining a copy of this form. The Department shall complete the approval part of the form and return one of the originally signed forms to the transporter after verifying that the transporter is complying with the financial responsibility requirements of this section. A copy of this form complete with the Department approval shall be carried in each vehicle transporting hazardous waste for the transporter. This approval is non-transferable and non-assignable.

(f) This subsection does not apply to any person who transports hazardous waste only on the site of a hazardous waste generator or a permitted hazardous waste treatment, storage, or disposal facility.

(g) States and the federal government are exempt from the requirements of this subsection.

(3) Evidence of financial responsibility, updated for the current year, shall be verified annually by the submission of the appropriate form described in paragraph (2)(b) of this section or by the submission of a certificate of insurance. A certificate of insurance shall include a certification by the insurer that the original insurance policy and all endorsements are still in full force and effect as evidenced on the original forms submitted to the Department.

*Specific Authority 403.704, 403.721, 403.724, 403.8055 FS. Law Implemented 403.704, 403.721, 403.724 FS. History—New 11-8-81, Amended 5-31-84, 9-13-84, Formerly 17-30.17, Amended 9-19-86, 3-31-87, 5-26-87, 6-28-88, Formerly 17-30.170, Amended 1-25-89, 8-13-90, 9-10-91, 10-14-92, 10-7-93, Formerly 17-730.170, Amended 1-5-95, 4-30-97, 8-19-98, 2-4-00, 12-20-00, 8-1-02, 10-1-04, 1-29-06, 4-6-06, 5-1-07, 4-25-08.*

#### **62-730.171 Transfer Facilities.**

(1) 40 CFR 263.12 [as adopted by reference in subsection 62-730.170(1), F.A.C.] provides that transporters who store manifested hazardous waste in proper containers at a transfer facility for 10 days or less are exempt from regulation as a hazardous waste facility. If the waste is stored for more than 10 days, the facility is subject to the permitting requirements for a hazardous waste storage facility.

(2)(a) The transporter who is owner or operator of a transfer facility which stores manifested shipments of hazardous waste for more than 24 hours but 10 days or less (hereinafter referred to as “the transfer facility”) shall obtain an EPA/DEP identification number for each transfer facility location and notify the Department using Form 62-730.900(1)(b), “8700-12FL – Florida Notification of Regulated Waste Activity,” effective date January 4, 2009 [adopted by reference in paragraph 62-730.150(2)(a), F.A.C.].

(b) Notification pursuant to this subsection shall be submitted at least 30 days before the storage of hazardous waste is to begin at a transfer facility.

(c) The notification shall include the information and documentation required by subsection 62-730.171(3), F.A.C.

(d) The transfer facility shall annually submit updated information on Form 62-730.900(1)(b), “8700-12FL – Florida Notification of Regulated Waste Activity,” effective date January 4, 2009, which is adopted and incorporated by reference at paragraph 62-730.150(2)(a), F.A.C.

(3)(a) The following items constitute initial transfer facility notification:

1. Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), F.S. The Certification shall state a factual basis for the conclusion that the location criteria are met, and how those facts were determined.

2. Completed Form 62-730.900(1)(b), “8700-12FL – Florida Notification of Regulated Waste Activity,” effective date January 4, 2009, which is adopted and incorporated by reference at paragraph 62-730.150(2)(a), F.A.C.

3. Evidence of the transporter’s financial responsibility as required under subsection 62-730.170(3), F.A.C.

4. A brief general description of the transfer facility operations, including customer base, anticipated waste codes, operating procedures, structures and equipment (with the maximum design capacity for storage), including engineering drawings or sketches if any.

5. A copy of a closure plan demonstrating that the transfer facility will be closed in a manner which satisfies the closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112, 265.114 and 265.115 [as adopted by reference in subsection 62-730.180(2), F.A.C.].

6. A copy of the contingency and emergency plan required by paragraph 62-730.171(4)(a), F.A.C.

7. A map or maps of the transfer facility, depicting property boundaries, access control, buildings or other structures and pertinent features (such as recreation areas, runoff and stormwater control systems, access or internal roads, sanitary and process sewer systems, loading and unloading areas, and fire control equipment.)

(b) A transporter who is operating a transfer facility must notify the Department prior to making changes in any of the items listed in paragraph 62-730.171(3)(a), F.A.C.

(c) No person shall operate a transfer facility before receiving confirmation from the Department that the initial notification package is complete and technically adequate and receiving an EPA identification number for the transfer facility.

(4) A transfer facility shall comply with the following requirements:

(a) 40 CFR Part 265 Subparts B (general facility standards), C (preparedness and prevention), D (contingency and emergency plan), and I (management of containers), with the exception of 265.13, as adopted by reference in subsection 62-730.180(2), F.A.C.

(b) The aisle space requirements described in 40 CFR 265.35 and the special requirements for incompatible wastes described in 40 CFR 265.177(c) shall not apply at transfer facilities to containers stored in trucks loaded in accordance with DOT regulations described in 40 CFR 263.10 [as adopted by reference in subsection 62-730.170(1), F.A.C.].

(5) Hazardous waste stored at transfer facilities in containers or vehicles shall be stored on a manmade surface which is capable of preventing spills or releases to the ground.

(6) The transfer facility shall maintain a written record of the items listed below. This recordkeeping requirement applies to all hazardous waste that enters and leaves the transfer facility, including hazardous waste generated by CESQGs. Records required in this subsection shall be maintained in permanent form for at least three years and shall be available for inspection by the Department. The records shall be kept at the facility unless the Department gives written approval to do otherwise.

(a) Manifest number for each shipment that enters and leaves the facility, or, for a shipment from a CESQG without a manifest, an identifying number from the shipping document.

(b) The date when all hazardous waste enters and leaves the facility.

(c) The generator's name and the EPA/DEP identification number. For CESQGs without an EPA/DEP identification number, the record shall include the name and address of the generator.

(d) Amounts of hazardous waste and hazardous waste codes associated with each shipment into and out of the facility.

(7) Within 60 days of closure of the transfer facility, the transporter who is owner or operator of the transfer facility shall submit to the Department a certification that the facility has been closed in accordance with the specifications in the closure plan. The certification shall be signed by the owner or operator of the transfer facility, by the owner of the real property where the transfer facility is located, and by a Florida-registered, professional engineer.

(8) Construction, initial operation or substantial modification of a transfer facility which stores shipments of hazardous waste that are required to be manifested, and which does not comply with the location standards in Section 403.7211, F.S., is prohibited. A transporter operating a transfer facility is subject to the demonstration requirements of subsections 62-730.182(3)-(8), F.A.C., regarding substantial modification.

*Specific Authority 403.0877, 403.704, 403.721 FS. Law Implemented 403.0877, 403.704, 403.721 FS. History—New 3-2-86, Amended 6-28-88, Formerly 17-30.171, Amended 8-13-90, 9-10-91, 10-14-92, Formerly 17-730.171, Amended 1-5-95, 1-29-06, 10-28-08, 1-4-09.*