



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Perma-Fix Of Florida Inc

On-Site Inspection Start Date: 04/21/2009

On-Site Inspection End Date: 04/21/2009

ME ID#: 50775

EPA ID#: FLD980711071

Facility Street Address: 1940 NW 67th PI, Gainesville, Florida 32653-1649

Contact Mailing Address: 1940 NW 67th PI, Gainesville, Florida 32653-1649

County Name: Alachua

Contact Phone: (352) 395-1356

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

TSD Facility Unit Type(s)

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Environmental Specialist III

Other Participants: Meaghan Bernier, Environmental Specialist; Kurt Fogleman, EH&S Manager

LATITUDE / LONGITUDE: Lat 29° 43' 0.5156" / Long 82° 20' 59.741"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

Perma-Fix of Florida, Inc. (Perma-Fix), a subsidiary of Perma-Fix Environmental Services, is a Large Quantity Generator and a permitted hazardous waste storage facility. The facility's processes include liquid and sludge bulking, scintillation vial and other small container crushing and shredding, repackaging of solid wastes contaminated by hazardous wastes, stabilization of wastes in containers, thermal desorption and/or chemical oxidation, used oil handling, petroleum contact water (PCW) transportation and consolidation and storage of discarded mercury-containing devices.

Perma-Fix was issued permit number 17680-009-HC on September 15, 2006. The permit is for the operation of a hazardous waste treatment, storage facility consisting of a tank, two container storage areas, and two miscellaneous treatment units. The facility was last inspected on June 16, 2008. Operations have not changed since then and the same procedures are in place and being implemented.

Process Description:

PROCESSING AND STORAGE BUILDING

Inspection Date: 04/21/2009

The Processing and Storage Building (PSB) is a permitted hazardous waste container and tank storage area, as well as a fuel-blending location that includes phase separation treatment. The hazardous waste containers that were examined were properly labeled and closed and had been dated with the storage start date. Pallets are used for stacking drums a maximum of two high, with a maximum of four 55-gallon drums per pallet.

A 3,000-gallon AST is located in the approximate center of the permitted container storage area. The tank has appropriate secondary containment and a sump to contain any spillage. At the time of this inspection, the AST was empty and has not been used to store any waste since it was installed.

The majority of waste consolidation and fuel blending occurs in the east side of the permitted TSD building. Hazardous wastes that arrive in drums are consolidated into tanker trucks for fuel blending. Containerized hazardous wastes that contain a high percentage of solids or sludge are sometimes blended with liquids from one of the 550-gallon totes to obtain a mixture that can be pumped into a tanker truck. The mixture is then manifested to Energis, LLC. Sludges/solids are consolidated into 55-gallon drums and disposed of as hazardous waste. All containers of hazardous waste in the fuel blending section of the permitted storage area were properly closed, labeled, and dated. Subpart BB equipment was properly working at the time of inspection.

TREATMENT AND OPERATIONS BUILDING

The permitted storage area has seven different zones of secondary containment inside the Treatment and Operations Building (TOB). A maximum volume of 35,200 gallons of hazardous waste can be stored in the TOB as stipulated in Attachment B of the permit. At the time of the inspection the facility was not exceeding the maximum volume or the volume limits for each the individual storage zones.

The Perma Fix-I (PF-I) and Perma Fix-II (PF-II) operations occupy the northeast portion of this building. Both PF-I and PF-II processes are conducted in a quonset hut that is located in this building. The PF-I process consists of stabilization and fixation treatment. This is conducted primarily in 55-gallon drums. The PF-II process consists of thermal desorption and/or chemical oxidation batch treatment of 110-gallons or less.

Perma-Fix Analytical Services occupies the southeast corner of the TOB. The laboratory performs fingerprint analyses on each incoming waste stream to confirm that waste received by the facility conforms to the initial waste profile. Laboratory operations generate waste acid, solvents, liquids, glass, and plastic that are managed as hazardous waste and are transferred to the LSF processing area for liquid recovery. Waste glass and plastic are processed through the LSF area and are shipped to Covanta as non-hazardous solid waste. The laboratory 90-day accumulation area is located just outside the lab in the east half of the TOB. At the time of the inspection, there was one 55-gallon drum that was properly labeled, dated, and closed.

LSV PROCESSING AND WASTE STORAGE BUILDING

The Waste Storage Warehouse (WSW) contains a newly permitted (since last inspection) hazardous waste container storage area, Liquid Scintillation Fluid (LSF) processing area, Debris Treatment Unit, maintenance shop, and a separate storage area for used oil, oily wastewater, and other non-hazardous wastes.

WSW Hazardous Waste Container Storage Area

The WSW container storage area consists of two zones for storage of hazardous waste in containers meeting D.O.T specifications and in sizes of 718 gallons or less. The permit authorizes the storage of a maximum volume of 54,340 gallons of hazardous waste. The storage area is a bermed concrete containment system with an impervious coating fire suppression system. The hazardous waste containers that were examined were properly labeled and closed, and had been dated with the storage start date. At the time of the inspection, the facility was not exceeding the maximum volume or the volume limits for each the individual storage zones.

Inspection Date: 04/21/2009

Spent mercury-containing lamps were being stored near the LSV staging area of the building. Spent mercury-containing lamps are shipped to AERC, Inc. for reclamation. The accumulation area was labeled, pursuant to Chapter 62-737, Florida Administrative Code (F.A.C.).

Liquid Scintillation Fluid (LSF) Processing

Perma-Fix performs waste processing and liquid bulking for LSF. Scintillation fluids emit traceable amounts of radiation when exposed to a radiation source. These fluids are generally used by hospitals and research institutes as tracer fluids. The LSF contain small amounts of xylene and toluene and may be radioactive. The LSF is therefore regulated under the Resource Conservation and Recovery Act (RCRA) as F003/F005 hazardous waste, and, if radioactive, as a Mixed Waste under RCRA and Nuclear Regulatory Commission (NRC) rules. At the time of inspection, the facility had not operated this unit since November due to the slow pace of LSF vials received.

After the paperwork corresponding to each drum has been checked, the drums are tagged and staged in the temporary holding area before processing. During staging, the drums are segregated by generator. During processing, each generator's waste is processed separately. A hoist lifts the drums, and the contents are emptied onto a shaker screen. Packing materials (e.g. vermiculite) that fall into a catch basin are tested for radioactivity and transferred to a roll-off container. The packing material is manifested to Covanta in Okahumpka, Florida as non-hazardous solid waste.

The glass and plastic vials that remain on top of the shaker table are conveyed to a crusher. The fluid in the vials is drained into a basin and transferred into one of two 80-gallon test tanks. The fluids are tested for radioactivity and then pumped to totes in the permitted storage area, or are temporarily containerized to facilitate radioactive decay.

The crushed vials are triple washed in ethanol and water. The ethanol/water wash is changed after approximately 30 drums of LSF vials have been processed. The D001 waste ethanol is transferred to a tote in the permitted storage area. The waste glass/plastic is transported to Covanta for disposal as non-hazardous waste.

Liquid wastes, including LSF and hazardous waste liquids, also arrive at the facility in bulk containers or tanker trucks. Liquid wastes that test negative radiologically and have waste codes D001/F003/F005 are bulked into 550-gallon totes pending future transfer into a tanker truck. Hazardous waste liquids that test positive radiologically are temporarily containerized to facilitate radiological decay. Hazardous waste liquids (including rinseate from the LSF process) that can be burned for energy recovery are manifested to Energis, LLC (Holly Hill, South Carolina). All other liquid wastes, particularly hazardous wastes that contain a high percentage of water, are manifested to EQ Resource Recovery, Inc. (Romulus, Michigan).

Maintenance Shop

The maintenance shop is located in this building and contains one parts washer. Diesel fuel is used as a solvent, generating a non-hazardous waste parts washer fluid. The facility generates less than 55 gallons per year of this waste stream, which is added to the used oil in the fuel blending area for energy recovery as needed. Used batteries are picked up by Interstate Battery or shipped to AERC, Inc. for recycling as needed. At the time of the inspection, the facility's used oil filter container was not properly labeled, which is a violation of Rule 62-710.850(5)(a), F.A.C. This was fixed during the inspection.

Perma-Fix is currently registered as a used oil transporter, marketer, oil filter transporter, oil filter transfer facility, petroleum contact water (PCW) transporter, and a mercury-containing lamps storage facility. The non-hazardous waste building is used to store used oil, oily wastewater, and other non-hazardous wastes. Non-hazardous solid wastes, including used oil, used oil filters, oily sludge and oil-contaminated solids and vermiculite, are stored in 55-gallon drums and 550-gallon totes. Used oil and used oil filters are sent to Covanta for recycling and energy recovery. Oily water is sent to Industrial Water Services, Inc. for disposal. Oily sludges and solids are sent to either Soil Treatment Services, Inc. or Kleen Soil. Used vermiculite is bulked and shipped to Covanta for processing. Petroleum contact water (PCW) is transported to Industrial Water Services for processing and disposal. All used oil related wastes are stored on a concrete floor within

Inspection Date: 04/21/2009

secondary containment. All drums and totes holding used oil or used oil filters in the area were in good condition and were properly labeled.

RECORD REVIEW:

During the inspection, records documenting the treatment procedures and operation log of the monitoring equipment were reviewed. Based upon the review of these documents, Perma-Fix is meeting the requirements of the specific conditions listed in the permit. In addition, randomly selected records for inbound shipments of waste were reviewed for compliance for required waste screening, selected treatment, and final disposal history. No discrepancies were noted during this record review.

A review of the facility's manifests, operating records, including the operation log for the stipulated requirements in the permit, biennial reports, annual reports of used oil and PCW activities, arrangements with local authorities, training records, and inspection logs revealed no discrepancies. The contingency plan was on-site and up-to-date. Perma-Fix of Florida, Inc. is currently a Large Quantity Generator of hazardous waste and a permitted TSD facility.

Subpart BB records were found to be complete. Subpart BB equipment is used less than 300 hours per year, and therefore must be inspected annually as opposed to monthly. The Subpart BB equipment was inspected in June 2008.

New Potential Violations and Areas of Concern:**Used Oil Generator Checklist**

Type: Violation
Rule: 62-710.850(5)(a)
Question Number: 5.140
Question: Are used oil filter containers labeled "Used Oil Filters"?
Explanation: The facility's used oil filter container in the maintenance shop was not properly labeled.
Corrective Action: The facility labeled the container during the inspection. No further action is required.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Used Oil Generator Checklist 62-710.850(5)(a)		04/21/2009	The facility's used oil filter container in the maintenance shop was not properly labeled.

Areas of Concern

No Areas of Concern

Inspection Date: 04/21/2009

Signed:

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

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

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

8/27/2009

DATE

Meaghan Bernier

INSPECTOR NAME

Environmental Specialist

INSPECTOR TITLE

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Kurt Fogleman

REPRESENTATIVE NAME

EH&S Manager

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Perma-Fix

ORGANIZATION**Report Approvers:**

Vicky Valade

SUPERVISOR NAME

Environmental Manager

SUPERVISOR TITLE**SUPERVISOR SIGNATURE**

FDEP

ORGANIZATION

8/27/2009

DATE

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