



Jeb Bush  
Governor

# Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Colleen Castille  
Secretary

May 16, 2006

**ELECTRONIC MAIL**

vsanagustin@perma-fix.com

Mr. Victor L. San Agustin, P.E.  
Director of Compliance  
PermaFix Environmental Services  
10100 Rocket Boulevard  
Orlando, Florida 32824

OCD-HW/C-06-0118

Orange County – HW  
PermaFix Orlando  
RCRA Inspection Report

Dear Mr. San Agustin:

A hazardous waste compliance inspection was conducted at your facility on March 23, 2006. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes. This inspection is designed to ascertain the compliance status of your facility with 40 CFR Parts 260-268, and 279 as adopted in Florida Administrative Code Chapters 62-730 and 62-710. The attached inspection report indicates that PermaFix Orlando was a transporter, transfer facility, and permitted storage facility of hazardous waste and was in compliance at the time of this inspection.

If you have any questions please contact John White at [john.white@floridadep.net](mailto:john.white@floridadep.net) or at (407)893-3323.

Sincerely,

Lu Burson  
Environmental Manager  
Solid and Hazardous Waste Programs

LB/jw



Jeb Bush  
Governor

# Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Colleen Castille  
Secretary

## HAZARDOUS WASTE INSPECTION REPORT

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

FACILITY NAME Perma-Fix of Orlando, Inc. EPA ID # FLD980559728

STREET ADDRESS 10100 Rocket Blvd. and 10225 General Dr., Orlando Florida 32824

EMAIL ADDRESS vsanagustin@perma-fix.com

COUNTY Orange PHONE 407-859-4441 DATES 3/23/06 & 3/28/06 TIMES 1010 & 1000

### **NOTIFIED AS:**

☐ N/A

### **CURRENT STATUS:**

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☒ Generator (>1000 kg/mo.)
- ☒ Transporter
- ☒ Transfer Facility
- ☐ Interim Status TSD Facility
- ☒ TSD Facility
- Unit Type(s): Storage
- ☐ Exempt Treatment Facility
- ☒ Used Oil: Transporter

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☒ Generator (>1000 kg/mo.)
- ☒ Transporter
- ☒ Transfer Facility
- ☐ Interim Status TSD Facility
- ☒ TSD Facility
- Unit Type(s): Storage
- ☐ Exempt Treatment Facility
- ☒ Used Oil: Transporter

## 2. **APPLICABLE REGULATIONS:**

- |   |   |   |   |
|---|---|---|---|
| <input type="checkbox"/> 40 CFR 261.5           | <input checked="" type="checkbox"/> 40 CFR 262  | <input checked="" type="checkbox"/> 40 CFR 263  | <input checked="" type="checkbox"/> 40 CFR 264  |
| <input type="checkbox"/> 40 CFR 265             | <input type="checkbox"/> 40 CFR 266             | <input checked="" type="checkbox"/> 40 CFR 268  | <input checked="" type="checkbox"/> 40 CFR 273  |
| <input checked="" type="checkbox"/> 40 CFR 279  | <input checked="" type="checkbox"/> 40 CFR 280  | <input checked="" type="checkbox"/> 62-701, FAC | <input checked="" type="checkbox"/> 62-710, FAC |
| <input checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-761, FAC |   |

## 3. **RESPONSIBLE OFFICIAL(s):**

Mr. Steven Schneider, General Manager, Perma-Fix

## 4. **INSPECTION PARTICIPANTS:**

John White, FDEP, Hazardous Waste  
Kathy Gaynor, FDEP, Hazardous Waste

Raj Singh, Operations Manager, Perma-Fix

## 5. **LATITUDE/LONGITUDE:** 28°25'04" / 81°23'10"

## 6. **NAICS Code:** 562112

## 7. **TYPE OF OWNERSHIP:** ☒ Private ☐ Federal ☐ State ☐ County ☐ Municipal

## 8. **HAZARDOUS WASTE PERMIT #:** 26919-HO-004 **ISSUED:** 11/14/2003 **EXPIRES:** 1/06/2008

9. **INTRODUCTION:**

On March 23, and March 28, 2006, John White and Kathy Gaynor, Florida Department of Environmental Protection (FDEP), inspected Perma-Fix of Orlando, Inc. (Perma-Fix) for compliance with solid and hazardous waste regulations. Perma-Fix, located at 10100 Rocket Boulevard, Orlando, Orange County, Florida, is a hazardous waste and used oil transporter, transfer facility, and permitted storage facility of solid and hazardous waste.

This report documents the facility's compliance status as of March 28, 2006.

10. **HAZARDOUS WASTE INSPECTION HISTORY:**

This operation has been at this location since 1985 but was originally called Chemical Conservation Corporation. The facility changed names to Perma-Fix Orlando in 2001. The facility has been inspected yearly since 1985. From 1985 to 1997 the facility was out of compliance seven times. The following information lists specific inspections:

August 1998

The facility was in compliance at the time of the inspection.

September 1998

The facility was out of compliance at the time of the inspection. The facility was cited for failure to provide annual training of hazardous waste regulations.

September 1999

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations; failure to conduct proper waste determinations and determine appropriate land disposal restrictions, failure to update contingency plan, failure to segregate hazardous waste, failure to conduct annual hazardous waste training, failure to maintain the facility to minimize sudden releases, failure to submit annual verification of insurance, and failure to maintain current financial assurance.

November 1999

The facility was in compliance at the time of the inspection.

June 2000

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations; storing non-hazardous waste in the hazardous waste storage area, and failure to notify the Department of ability to meet a specific permit condition, specifically, using an unacceptable surety company for insurance.

May and August 2001

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations; failure to maintain the facility to minimize sudden releases, failure to utilize the waste analysis plan and violating specific permit condition, specifically, failing to rectify manifest discrepancies within 15 days of receipt of the waste.

#### April 2002

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations; failure to label hazardous waste containers, failure to maintain hazardous waste containers closed, failure to conduct weekly inspections, failure to label hazardous waste containers with an accumulation start date, storing over the capacity of facility as stated in the permit, failure to meet land disposal treatment standards, and storing transfer waste longer than 10 days.

#### March 2003

The facility was out of compliance at the time of the inspection. The facility stored four drums of hazardous waste longer than one year; however, the drums were shipped off-site the day after the inspection and the Department took no further action.

The facility was not in compliance at the time of this inspection. The facility was cited for storing over the capacity of the facility as stated in the RCRA permit, storage over the 10 day transfer facility time limit, storage of waste for over one year, failure to perform a proper waste determination on waste prior to disposal, transport of "unknown" wastes,

### **11. PROCESS DESCRIPTION:**

Perma-Fix collects hazardous waste from generators using Perma-Fix's own transportation services as well as other registered hazardous waste transporters. Generators serviced by Perma-Fix are those that generate hazardous waste that is exclusive of explosive, radioactive, or biomedical waste. Perma-Fix operates under hazardous waste storage permit number 26919-HO-004, issued November 14, 2003.

Before collecting any waste, the generator's request is reviewed to determine if the waste stream for collection has passed an evaluation process. Perma-Fix requires that each new waste stream be tested and that each waste stream's acceptance be updated yearly. The evaluation process used is described in detail in the waste analysis plan section of the facility's permit application. Based on the regulatory status of the waste stream and the conditions set forth in the permit that authorizes Perma-Fix to manage hazardous waste, Perma Fix then decides whether to collect the waste.

Perma-Fix collects hazardous waste and stores the material in its warehouse for up to a year before transporting the waste to an off-site disposal facility. Perma-Fix uses the 10-day transfer facility status when possible in order to avoid re-manifesting, record keeping, reporting, and other more stringent permit requirements. Waste stored for a period longer than 10 days is transferred to Perma-Fix's designated storage facility. Perma-Fix then amends the incoming manifest to reflect the change, the containers are relabeled, and the waste is managed in accordance with the permit requirements.

Hazardous wastes are segregated at the facility according to compatibility groups as outlined in the permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment.

Perma-Fix consolidates electroplating sludge, lab-packs and other waste streams, including acids. These waste streams consist of compatible wastes that are subject to the same treatment method or technology to meet the land disposal restriction requirements. Bulking and consolidation take place in the consolidation building at the north end of the property. Lab-packs are processed in this area in an enclosure similar to a fume hood, which is vented to the outside. An eyewash, safety shower, spill kit, and fire extinguisher are located in this area. An aerosol can puncturing operation is also located in this area. Aerosol cans are punctured and the contents are managed as hazardous waste. The empty cans are managed as solid waste. The parking lot of the facility is sloped towards the northwest corner. A sump (Figure 14) installed in the northwest corner is connected to valves to ensure no releases to a retention pond.

## **12. INSPECTION:**

### **Storage Area**

Wastes stored in the permitted storage area are segregated according to compatibility groups as outlined in the permit. The wastes are staged along the south, east, and north walls of the building. The west wall contains the bay doors leading to the loading dock.

The storage area contained, approximately, the following number of hazardous waste containers:

- Four hundred ten 55-gallon drums
- Twenty-one overpack containers
- Twenty 250-gallon totes
- Eight cubic yard boxes
- Sixty-six 30-gallon containers
- Fourteen 15-gallon containers
- One hundred fourteen 5-gallon containers
- Two pallets of batteries – managed as universal waste

In front of the containers in row 302 was one 55-gallon drum containing glycol and isopropanol that was rusty and dented. The container had been placed in storage on 03/17/2006. The container was sitting in front of the row so the drum could be over-packed. In row number 105 was one drum of sulfuric acid, D080511-10, with the side of the drum pulled in by a vacuum within the container. In row 209 was a 5-gallon pail of organic peroxide, ND0207, that had a bulging lid. The containers were pointed out to the operations manager.

### **Loading Dock**

The loading dock, just outside the permitted storage area, is used for storage of 10-day transfer waste. Trucks are unloaded on the docks and waste that is not accepted into storage remains in this location until it is transferred to new trailers for shipment off-site. The western edge of the loading dock is approximately 15 meters from the western property line. Ignitable hazardous waste can not be stored any further west than the edge of the loading dock. At the time of this inspection there were the following containers on the loading dock:

- Sixteen 55-gallon drums
- One overpack container
- One pallet of universal waste bulbs

### **Lab Pack and Bulking Consolidation Area**

Located inside the consolidation area were approximately sixty-three 55-gallon drums, nine 250-gallon totes/cubic yard boxes, thirty-nine 30-gallon containers, twenty-one 15-gallon containers, three 10-gallon containers and eighty-one 5-gallon containers.

Aerosol cans are punctured in the consolidation area. At the time of the inspection, three 55-gallon drums were storing hazardous waste from the drum puncturing process. All of the drums were labeled and dated correctly. Waste from the can puncturing device accumulates in a drum equipped with a carbon filter on the small bung hole. The carbon filter is changed out on a regular basis and disposed of as hazardous waste.

Located in the consolidation area is a compactor used to compress waste. Within the compactor was a drum containing chemotherapy waste. The waste is accepted in 5-gallon pails. The pails are emptied into the drum and compacted to reduce the volume of waste shipped off-site.

Outside the Lab Pack and Bulking Consolidation Area the facility is storing roll off containers and trailers used for consolidating metal bearing waste. At the time of the inspection there were two roll off containers and three trailers containing metal bearing waste all labeled and dated correctly. There were also two roll off containers of non-hazardous solid waste stored in this area.

#### **Outside East Side of the Warehouse**

On the east side of the property were several trailers. Most of the trailers were empty; however, one contained empty drums.

#### **Outside West Side of the Warehouse**

On the west side of the property were seven trailers containing waste to be accepted into storage. One trailer, number 783, was selected at random. The trailer was half-full of waste containers and had arrived on-site March 22, 2006, the day before this inspection. The manifests were being entered into the computer and profiles were being checked before the waste would be off-loaded.

**Based on the visual inspection, the storage area, loading dock, and consolidation area contained roughly the equivalent of at least 750 drums of waste or approximately 37,500 gallons of waste. Following the inspection, Perma-Fix provided documentation that estimated the amount of waste on site during March 2006 at 691 drums or 30,968 gallons. Both amounts are below the facility's permit limit of 824 55-gallon drums or a total volume equivalent of 45,320 gallons.**

#### **Record Review**

Records from 2005 to present were reviewed that included hazardous waste manifests, land disposal restriction notification forms, training records, contingency plan, waste analysis plan, inspections, financial assurance documentation and biennial report. The facility was previously notified that the biennial report contains errors and needs to be modified. The contingency plan was last updated January 9, 2006.

The facility is maintaining documentation showing the proper notifications for the importation of hazardous waste have been made in accordance with 40 CFR 264.12.

Specific training regarding 10-day transfer facility requirements, one year permitted storage requirement, used oil transportation requirements, and used oil filter transportation requirements was conducted on March 13, 2006. The last OSHA required training event was held on February 27, 2006.

During the inspection a container, number ND0097, was selected at random and Perma-Fix was asked to provide documentation regarding the contents of the container. The facility was able to provide detailed records showing hazardous waste from multiple generators had been consolidated within the drum.

### **13. AREAS OF CONCERN:**

Containers that are bulging or showing signs of compression due to a vacuum within the container must be addressed in a timely manner.

The facility needs to ensure training conducted follows not only those items agreed to as the result of past enforcement actions but that it also follows the training plan outlined by the facility in the hazardous waste permit application.

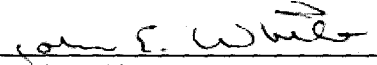
Part VI, Waste Consolidation, Specific Condition 2.d. of the hazardous waste permit requires that the compatibility test result for each waste tested be documented in a log that identifies the waste container and indicates changes in temperature, bubbling action and gas generation observed. According to Raj Singh, Operations Manager, compatibility testing information is being kept on consolidation of bulk acids, but not on consolidation of smaller containers of acid. Perma-Fix should review the permit and application and, if necessary, document all compatibility testing.

The volume of waste on site in February 2006 was 810 drums or the volume equivalent of 43,779 gallons. This is very close to the permit limit of 824 drums or the volume equivalent of 45,320 gallons. The facility must ensure it does not exceed the permitted storage limit.

**14. CONCLUSION:**


Perma-Fix, Orlando was inspected as a hazardous waste transporter, transfer facility, and permitted storage facility of hazardous waste and was in compliance at the time of this inspection.

Report Prepared By: \_\_\_\_\_

  
John White  
Environmental Specialist

May 10, 2006  
Date

Report Reviewed By: \_\_\_\_\_

  
Lu Burson  
Environmental Manager

May 16, 2006  
Date

jw