



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

FACILITY INFORMATION:

Facility Name: Tampa Electric Co - Central Operations

On-Site Inspection Start Date: 09/16/2010

On-Site Inspection End Date: 09/16/2010

ME ID#: 35654

EPA ID#: FLD981477904

Facility Street Address: 2200 E Sligh Ave, Tampa, Florida 33610-1334

Contact Mailing Address: Po Box 111, Tampa, Florida 33601

County Name: Hillsborough

Contact Phone: (813) 228-4257

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Jerry Adams, ED Environmental Coordinator; Shannon Camp, Environmental Specialist II; Beverly Morgan, Senior Environmental Technician

LATITUDE / LONGITUDE: Lat 28° 0' 44.9314" / Long 82° 25' 58.1081"

SIC CODE: 4911 - Trans. & utilities - electric services

TYPE OF OWNERSHIP: Private

Introduction:

The Tampa Electric Company Central Operations Center (COC) was inspected to determine its compliance with state and federal hazardous waste regulations. COC notified the Department of Environmental Protection (Department) of its status as a small quantity generator of hazardous waste (SQG) on February 25, 2010. The inspectors were accompanied throughout the inspection by Beverly Morgan, Senior Environmental Technician, and Jerry Adams, ED Environmental Coordinator. The facility was last inspected by the Department's Hazardous Waste Section on March 14, 2006.

Process Description:

The COC is a clearing house for all Tampa Electric Company (TECO) equipment needing repairs, including vehicles and transformers. It also collects hazardous, nonhazardous and universal wastes from other TECO conditionally exempt small quantity generator facilities and ships them for disposal. Used oil may be transported from field locations and temporarily stored here, and the COC is notified as both a used oil transporter and transfer facility. The COC is currently an episodic SQG, and at the time of the inspection, there was at least one drum of hazardous waste in storage subject to SQG unit management rules. Additionally, the Department has estimated the amount of hazardous waste at the facility at the time of the inspection to be approximately 2,150-lbs, which is just under the threshold for SQGs. For these reasons, the Department recommends that the COC comply with SQG rules at all times.

Since the previous inspection, there has been little change to the facility, and more details regarding the facility may be found in the earlier reports. The inspection began in Investment and Recovery, which includes the universal waste processing and storage areas, as well as the 180 Day

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Hazardous Waste Storage Area. The Storage Area is equipped with a grated floor over a sealed, concrete sump. Hazardous and nonhazardous wastes are stored here on opposite sides of the Storage Area, and there is also a 55-gallon satellite accumulation drum for spent aerosol spray cans, and another for non-aerosol cans of waste paint. At the time of inspection, there was only one container of hazardous waste awaiting shipment for disposal, a steel 55-gallon drum containing spent blasting media dated 07-22-10. All the drums were closed and properly labeled. Other wastes observed in the Storage Area included one drum for collection of alkaline batteries and a drum for collection of Ni-Cad batteries. The drums were being managed properly. All universal wastes are disposed of through Veolia. Hazardous wastes are usually disposed of at EQ Florida. There were also various spill kits noted around the Storage Area. Outside the building, various containers of universal waste lamps were being stored and processed.

Used oil is picked up from field locations and returned here for temporary storage until being picked up for recycling by PetroTech. Used oil is either transferred into a tank equipped with secondary containment or the tanker trailer is parked in the transfer area. The Substation Supervisor indicated that current practice is to have PetroTech pump out any transformers directly and not bring the used oil back to COC, but TECO intends to keep its status as a transporter and transfer facility in the event of an emergency.

The COC was requiring the transporter that picked up used oil from the facility to sign a log indicating all tanks and containers were emptied out to ensure the 35-day time limit was met, but that has not been done since switching to PetroTech. The COC must keep records that indicate used oil brought from other locations is stored no more than 35 days. The Department recommends that the COC go back to its previous practice.

The COC has a 1,000-gallon and a 10,000-gallon aboveground storage tank (AST) system, both for used oil, near Investment and Recovery, as well as 1,000-gallon AST for used oil from the Garage, all of which are double-walled and properly labeled. The facility is no longer using the two used oil ASTs located outside of Substation Operations. Used oil was also observed in several locations stored in drums and dollies. Several thousand gallons of used oil are picked up monthly for recycling from the COC.

There were several Areas of Concern noted that would be violations during those months when >220-lbs of hazardous waste are generated or when >2,200-lbs of hazardous waste is on site. These included Preparedness and Prevention issues, such as housekeeping and training, as well as unit management issues, such as labeling. Another Area of Concern was noted regarding the secondary containment in the used oil tanker trailer transfer area, which is not impervious, but was not in use at the time of the inspection. These Areas are outlined below.

Releases of hazardous waste were observed in both the Garage, where hazardous waste solvent was discharged onto the ground from a leaking container, and in the Paint Booth, where it was evident that hazardous paint waste was allowed to evaporate, spills of waste paint were left to dry rather than cleaned up and waste solvent contaminated rags were observed discarded into the regular trash. There have been no shipments of hazardous waste rags since before 2009.

Records reviewed included waste manifests, training documentation emergency response arrangements, which were last made in June 2010. Those arrangements refer to the facility's integrated contingency plan, which was not available during the inspection. Staff indicated during the inspection that the contingency plan requirement is now met via posting required information, however, not all required information was posted. Weekly inspections of the hazardous waste storage area are kept, but not all required information is recorded.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type: Violation

Inspection Date: 09/16/2010

Rule: 273.13(d)(1)

Explanation: At the time of the inspection, there was a pallet of boxes of spent mercury containing lamps, some of which were either open or had gotten wet and were not structurally sound. (corrected)

Corrective Action: During the inspection, the facility wrapped the pallet of boxes in plastic wrap, sealing up the open and damaged boxes.

Type: Area Of Concern

Rule: 279.45(d)(2)

Explanation: The facility is notified as a used oil transfer facility. Some of the used oil transported to this location is stored in ASTs with secondary containment, and some is stored in tanker trailers that are parked in a designated used oil transfer area equipped with berms. It was noted that the containment for this designated transfer station area is constructed of asphalt, and is therefore not impervious to used oil.

At the time of the inspection, there was no used oil in any of the tanker trailers located within the transfer area.

Corrective Action: In the event that used oil is brought to the facility from another location, it will need to either be placed into a tank or container equipped with secondary containment, or the used oil transfer area will need to be sealed with a material to make it impervious to used oil.

Type: Area Of Concern

Rule: 262.11

Explanation: It was noted that at least one paint product in use contains a RCRA heavy metal, and this was confirmed with the MSDSs reviewed after the inspection. Staff indicated that the paint booth filters were being managed as nonhazardous. A copy of the hazardous waste determination was requested but was not available. The facility stated that the last waste determination was done in 2006, and another hazardous waste determination is to be performed on this waste stream.

Corrective Action: Submit a copy of the hazardous waste determination and any supporting documentation to this office upon receipt.

Type: Area Of Concern

Rule: 262.34(d)(2), 262.34(c)(1)(ii)

Explanation: Hazardous paint waste was being accumulated in an unlabeled and open container.

Corrective Action: All hazardous waste should be stored in closed and properly labeled containers.

Type: Area Of Concern

Inspection Date: 09/16/2010

Rule: 262.34(d)(5)(iii)

Explanation: Based on the observations made during this inspection, it does not appear that the facility has ensured that all applicable employees are adequately trained.

Corrective Action: Applicable refresher training should be given to employees to ensure that the facility complies with SQG requirements during those months in which >220-lbs of hazardous waste are generated or when the facility has >2,200-lbs of hazardous waste on site.

Type: Violation

Rule: 403.727(1)(b)

Explanation: During the inspection of the Garage, there was a 55-gallon drum of hazardous waste parts washer solvent that was leaking. This was confirmed through examination of the bottom of the drum, which was elevated on wheels. The waste solvent had leaked onto the pavement under the drum and out the garage door across the threshold crack. (corrected)

Solvents and thinners in use contain, among other things, methylene chloride, methyl ethyl ketone (MEK), xylenes, toluene and ethyl benzene, making the spent solvents and associated wastes, such as contaminated rags, listed hazardous wastes (F003, F002 and / or F005). During the inspection of the Paint Booth, there were no containers designated for hazardous waste rags observed, and numerous waste rags were observed in the regular trash. (corrected)

In the Paint Booth, there was evidence of improper hazardous paint waste disposal by evaporation. Dried paint was observed dripped all around the opening to the trash can indicating improper disposal of liquid waste paint. Additionally, there was a cardboard box measuring approximately 18-inches by 10-inches by 12-inches containing hardened waste paint. Dried paint drips were observed both on and all around the box, which was located on the floor next to the work table in the main paint booth. Staff indicated that the box was used to catch drips from the paint gun. There were 6-8-inches of hardened waste paint accumulated in the cardboard box which had been allowed to evaporate. Note that there was a proper hazardous waste accumulation container next to the full cardboard box. (corrected)

There was a spill response truck parked near the soil storage area at the facility. Facility staff said that the truck had been used the previous night and was emptied out, however, an oily liquid was observed dripping from the vehicle tank fill port onto the truck and spattering onto the ground. (corrected)

Corrective Action: During the inspection, COC staff were directed to obtain an overpack drum for the leaking container in the Garage. After the inspection, TECO confirmed that the contents of the leaking container had been transferred to another container the same day as the inspection.

TECO staff confirmed that the contaminated rags observed in the trash were pulled out and transferred to a hazardous waste container pending review of the MSDSs for the solvents, etc. As stated previously, review of the MSDSs indicate the solvents in use would be listed hazardous waste upon disposal.

As discussed during the inspection, solvent based paint waste may not be allowed to evaporated as a means of disposal. Hazardous waste paint must be placed into a suitable container, designed to hold the waste, and then disposed of properly.

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During the inspection, the Facility Services Supervisor was contacted about replacing the cap gasket of the vehicle tank.

Type: Area Of Concern

Rule: 262.34(c)(1)

Explanation: In the Garage, there were two satellite containers for spent parts washer solvent next to each other. Both containers appeared to be approximately 1/3 full. At the time of the inspection, the facility was CESQG, so this is an Area of Concern and not a violation. (corrected)

Corrective Action: After the inspection, the leaking satellite drum was removed from service. Satellite accumulation areas are limited to 55-gallons or less per waste stream. The Department recommends limiting the available container volume to 55-gallons or less to ensure that there is never more than 55-gallons of each waste stream per satellite area.

Type: Area Of Concern

Rule: 262.34(d)(4)

Explanation: Housekeeping needed improvement in the Garage and the Paint Booth. The waste storage of the Garage was crowded and messy, making the leaking drum of hazardous waste not immediately visible from the Garage.

In the Paint Booth, dried paint was observed in both the main booth and the work / storage booth. There were multiple colors of paint dripped all over the wall, floor and lid of the trash can in the work booth. At the mixer, it was evident that at least one can of paint had opened during shaking, there was a thick layer of paint of a different color dried on the floor and neither had been cleaned. Finally, the work table in the main booth was covered with dried paint, along with the surrounding floor, and liquid paint waste had been repeatedly collected in a cardboard box and allowed to evaporate.

Corrective Action: Review housekeeping procedures with applicable employees. Ensure the facility is operated to minimize sudden or nonsudden releases of hazardous waste constituents.

Type: Violation

Rule: 62-730.160(6)

Explanation: The person(s) responsible for performing weekly inspections of the hazardous waste storage area is not recording all of the required information. At the time of the inspection, there was one drum of hazardous waste that was subject to SQG unit management rules.

Corrective Action: As discussed, the number of hazardous waste containers must be recorded during required weekly inspections.

Type: Area Of Concern

Rule: 262.34(d)(5)(ii)

Inspection Date: 09/16/2010

Explanation: The posting of required information did not include the locations of fire extinguishers, spill control equipment and fire alarms. Additionally, only one of the emergency contacts posted is the emergency coordinator for the COC (Jerry Adams), but there was no indication of this in the posting. Facility staff indicated that this posting of information was meant to satisfy the Emergency Preparedness requirements for SQGs, however, at the time of the inspection the facility was CESQG.

Corrective Action: Effective immediately, the COC either needs to post the required information next to a telephone, or alternatively, it may use a contingency plan that meets the requirements for large quantity generators of hazardous waste to comply with the Rule. The Department also recommends clearly identifying which contact is the designated emergency coordinator, since contacting that person should be a priority in the event of an emergency.

Summary of Potential Violations and Areas of Concern:Potential Violations

| Rule Number | Area | Date Cited | Explanation |
|----------------------------------|------|------------|--|
| Checklist Independent Violations | | | |
| 273.13(d)(1) | | 09/16/2010 | At the time of the inspection, there was a pallet of boxes of spent mercury containing lamps, some of which were either open or had gotten wet and were not structurally sound. (corrected) |
| 403.727(1)(b) | | 09/16/2010 | <p>During the inspection of the Garage, there was a 55-gallon drum of hazardous waste parts washer solvent that was leaking. This was confirmed through examination of the bottom of the drum, which was elevated on wheels. The waste solvent had leaked onto the pavement under the drum and out the garage door across the threshold crack. (corrected)</p> <p>Solvents and thinners in use contain, among other things, methylene chloride, methyl ethyl ketone (MEK), xylenes, toluene and ethyl benzene, making the spent solvents and associated wastes, such as contaminated rags, listed hazardous wastes (F003, F002 and / or F005). During the inspection of the Paint Booth, there were no containers designated for hazardous waste rags observed, and numerous waste rags were observed in the regular trash. (corrected)</p> <p>In the Paint Booth, there was evidence of improper hazardous paint waste disposal by evaporation. Dried paint was observed dripped all around the opening to the trash can indicating improper disposal of liquid waste paint. Additionally, there was a cardboard box measuring approximately 18-inches by</p> |

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| Rule Number | Area | Date Cited | Explanation |
|---------------|------|------------|---|
| | | | <p>10-inches by 12-inches containing hardened waste paint. Dried paint drips were observed both on and all around the box, which was located on the floor next to the work table in the main paint booth. Staff indicated that the box was used to catch drips from the paint gun. There were 6-8-inches of hardened waste paint accumulated in the cardboard box which had been allowed to evaporate. Note that there was a proper hazardous waste accumulation container next to the full cardboard box. (corrected)</p> <p>There was a spill response truck parked near the soil storage area at the facility. Facility staff said that the truck had been used the previous night and was emptied out, however, an oily liquid was observed dripping from the vehicle tank fill port onto the truck and spattering onto the ground. (corrected)</p> |
| 62-730.160(6) | | 09/16/2010 | <p>The person(s) responsible for performing weekly inspections of the hazardous waste storage area is not recording all of the required information. At the time of the inspection, there was one drum of hazardous waste that was subject to SQG unit management rules.</p> |

Areas of Concern

| Rule Number | Area | Date Cited | Explanation |
|--|------|------------|--|
| Checklist Independent Areas of Concern 279.45(d)(2) | | 09/16/2010 | <p>The facility is notified as a used oil transfer facility. Some of the used oil transported to this location is stored in ASTs with secondary containment, and some is stored in tanker trailers that are parked in a designated used oil transfer area equipped with berms. It was noted that the containment for this designated transfer station area is constructed of asphalt, and is therefore not impervious to used oil.</p> <p>At the time of the inspection, there was no used oil in any of the tanker trailers located within the transfer area.</p> |
| 262.11 | | 09/16/2010 | <p>It was noted that at least one paint product in use contains a RCRA heavy metal, and this was confirmed with the MSDSs reviewed after the inspection. Staff indicated that the paint booth filters were being managed as nonhazardous. A copy of the hazardous waste determination was requested but was not</p> |

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| Rule Number | Area | Date Cited | Explanation |
|-----------------------------------|------|------------|---|
| | | | available. The facility stated that the last waste determination was done in 2006, and another hazardous waste determination is to be performed on this waste stream. |
| 262.34(d)(2), 262.34(c)(1)(ii) | | 09/16/2010 | Hazardous paint waste was being accumulated in an unlabeled and open container. |
| 262.34(d)(5)(iii) | | 09/16/2010 | Based on the observations made during this inspection, it does not appear that the facility has ensured that all applicable employees are adequately trained. |
| 262.34(c)(1) | | 09/16/2010 | In the Garage, there were two satellite containers for spent parts washer solvent next to each other. Both containers appeared to be approximately 1/3 full. At the time of the inspection, the facility was CESQG, so this is an Area of Concern and not a violation. (corrected) |
| 262.34(d)(4) | | 09/16/2010 | Housekeeping needed improvement in the Garage and the Paint Booth. The waste storage of the Garage was crowded and messy, making the leaking drum of hazardous waste not immediately visible from the Garage. In the Paint Booth, dried paint was observed in both the main booth and the work / storage booth. There were multiple colors of paint dripped all over the wall, floor and lid of the trash can in the work booth. At the mixer, it was evident that at least one can of paint had opened during shaking, there was a thick layer of paint of a different color dried on the floor and neither had been cleaned. Finally, the work table in the main booth was covered with dried paint, along with the surrounding floor, and liquid paint waste had been repeatedly collected in a cardboard box and allowed to evaporate. |
| 262.34(d)(5)(ii) | | 09/16/2010 | The posting of required information did not include the locations of fire extinguishers, spill control equipment and fire alarms. Additionally, only one of the emergency contacts posted is the emergency coordinator for the COC (Jerry Adams), but there was no indication of this in the posting. Facility staff indicated that this posting of information was meant to satisfy the Emergency Preparedness requirements for SQGs, however, at the time of the inspection the facility was CESQG. |

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Conclusion:

Based on the observations made during this inspection, the facility was not in compliance with rules governing CESQGs.

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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.

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

10/26/2010

DATE

Shannon Camp

INSPECTOR NAME

Environmental Specialist II

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Jerry Adams

REPRESENTATIVE NAME

ED Environmental Coordinator

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Tampa Electric Company

ORGANIZATION

Beverly Morgan

REPRESENTATIVE NAME

Senior Environmental Technician

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Tampa Electric Company

ORGANIZATION

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