



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 16 2011

Mr. James Byer
Program Manager
Florida Department of Environmental Protection
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

SUBJ: RCRA Compliance Evaluation Inspection
Veolia Environmental Services Technical Solutions LLC
Universal Waste Transfer Yard
EPA ID No.: FLR 000 124 917

Dear Mr. Byer:

On December 6, 2010, a United States Environmental Protection Agency (EPA) lead Compliance Evaluation Inspection was conducted at Veolia Environmental Services Technical Solutions LLC (Veolia) in Tallahassee, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

If you have any questions regarding this matter, please contact Alan Newman, of my staff, by phone at (404) 562-8589 or by e-mail at newman.alan@epa.gov

Sincerely,

Bill Truman, Acting Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure

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ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 16 2011

Ms. Linda Dunwoody
Operations Manager
Veolia Environmental Services Technical Solutions LLC
342 Marpan Lane
Tallahassee, Florida 32305-0904

SUBJ: RCRA Compliance Evaluation Inspection
Veolia Environmental Services Technical Solutions LLC
Universal Waste Transfer Yard
EPA ID No.: FLR 000 124 917

Dear Ms. Dunwoody:

Enclosed is a copy of the U.S. Environmental Protection Agency (EPA), inspection report documenting the results of the December 6, 2010, inspection of the Veolia Environmental Services Technical Solutions LLC (Veolia) facility, 4972 Woodville Highway (South Lot), in Tallahassee, Florida. This was an EPA lead Compliance Evaluation Inspection for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

Enclosed is the CEI report that indicates one violation of RCRA was discovered. A copy of this report has been forwarded to the Florida Department of Environmental Protection (FDEP).

If you have any questions regarding this matter, please contact Alan Newman, of my staff, by phone at (404) 562-8589 or by e-mail at newman.alan@epa.gov.

Sincerely,

Bill Truman, Acting Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure

cc: Anthony Tripp, FDEP
James Byer, FDEP w/encl.
Aaron Mitchell, FDEP w/encl.

RCRA Inspection Report

1) Inspectors and Authors of the Report

Alan Newman
Environmental Engineer
newman.alan@epa.gov
(404) 562-8589

RCRA and OPA Enforcement and Compliance Branch
US EPA Region 4 AFC – 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Veolia Environmental Services Technical Solutions LLC (Veolia)
Universal Waste Transfer Yard

Mailing Address:
342 Marpan Lane
Tallahassee, Florida 32305-0904

Facility Address
4972 Woodville Highway (South Lot)
Tallahassee, Florida 32305-0903

Leon County
EPA ID No.: FLR 000 124 917

3) Responsible Official

Ms. Linda Dunwoody, Operations Manager
(850) 877 - 8299

4) Inspection Participants

Linda Dunwoody	Veolia
Randy Williams	Veolia
Aaron Mitchell	FDEP
Anthony Tripp	FDEP
Alan Newman	US EPA Region 4

5) Date and Time of Inspection

December 6, 2010, at 8:35 am

6) Applicable Regulations

Sections 3002 and 3007 of RCRA 40 CFR Parts 260 through 268, 270, 273 and 279 Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, 62-737, and 62-740 Florida Administrative Code.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) to determine the Veolia's EPA ID No.: FLR 000 124 917 compliance with the applicable regulations.

8) Facility Description

Veolia Environmental Services Technical Solutions LLC (Veolia) operates a universal waste transfer yard near to its permitted mercury reclamation facility. The transfer yard consists of an open field where trailers are parked for a period of time up to a maximum of ten days.

9) Previous Inspection History

On January 27, 2010, FDEP conducted a CEI; and FDEP and EPA conducted a joint CEI on March 16, 2009, at Veolia. There were no violations noted with either CEI.

10) Findings

After presenting their credentials to Linda Dunwoody, Operations Manager, and Randy Williams, Operations Supervisor, and explaining the purpose of the inspection, the inspection team requested a tour of the facility. The inspectors performed a walk-through inspection of the facility. An inspection of the universal waste transfer yard was conducted in conjunction with the inspection of Veolia's permitted mercury storage, recovery, and reclamation facility. Below is a description of the observations made during the walk-through.

- **Universal Waste Transfer Yard**

The inspection team reviewed the paperwork for the trailers of universal waste located in the transfer yard and selected three trailers at random to inspect. Trailers numbers 889977, 889976, and 818132 were selected for inspection. The inspection of trailer numbers 889977 and 889976 determined that the paperwork for these trailers matched the waste present on these trailers and thus they were in compliance. These two trailers were storing only universal wastes.

Trailer number 818132 was found to have a 5-gallon container that exhibited a hazardous waste label. Veolia investigated why this container labeled as hazardous waste was left on the trailer. Veolia explained that their normal procedures are to offload any hazardous waste that comes in via trailer prior to parking the trailer in the universal waste transfer yard. Veolia noted the container and questioned the generator of the container why they had used a hazardous waste label versus a universal waste label. The generator notified Veolia that they had mislabeled the waste as hazardous waste but used a bill of lading for its shipping documentation. The contents of the container were confirmed to be universal waste, mercury containing manufactured articles. Veolia informed the inspection team that they would refuse any future improperly labeled waste in the future. Veolia personnel immediately transported this 5-gallon container to the hazardous waste storage area at the permitted reclamation facility.

Veolia Environmental Services Technical Solutions LLC appears to be in violation of F.A.C. 62-730.171(2)(a) which requires a 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.].

- Permit Modification

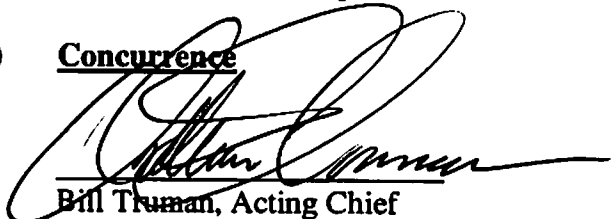
Veolia is exploring the possibility of relocating this transfer yard to a property nearer to the permitted reclamation facility for ease of inspection and convenience of transportation.

11) **Signed**


Alan R. Newman, Inspector

2/3/2011
Date

12) **Concurrence**


Bill Truman, Acting Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

2/15/2011
Date