



# 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

April 28, 2011

Mr. Merlin D. Russell Jr.  
Professional Geologist  
Florida Department of Environmental Protection  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: EQ Florida Inc.; FLD 981 932 494; Operating Permit Renewal  
Application 34875-HO-009  
Hillsborough County

Dear Mr. Russell:

In response to your letter dated April 11, 2011, I have attached the requested information. The response is in the form of an enclosure briefly detailing the changes that were made, a strikethrough/underline copy which indicates any deletions or additions that were made, and a clean copy of replacement pages for insertion into the binders that were originally submitted.

Thank you for your assistance during this process and please let me know if there is anything else I can provide.

Sincerely,

Stuart Stapleton  
EHS Manager

Enclosure  
Cc with enclosure:  
Jim Dregne, DEP Tampa

**ENCLOSURE**  
**The Environmental Quality Company FLD 981932494**  
**Operating Permit Renewal dated July 22, 2010**  
**7202 E. 8<sup>th</sup> Avenue, Tampa, Florida 33619**

**General Comments:**

1. All required Solid Waste Management Unit information required to complete the RFA Addendum has been submitted via e-mail. This information includes additional photographs of SWMU 10 (Roll-Off Storage), SWMU 11 (Transfer Facility), and SWMU 12 (Used Oil Facility), the beginning operational date for SWMU 14 (Part Washer), the correction of the photograph of SWMU 18 (Drum Crushing), and an electronic copy of Figure 5.14 Solid Waste Management Units.
2. The physical limits of the Transfer/Staging Facility Area (SWMU 11) have been defined on Figure 15.4. All ignitable or reactive waste will be located at least 15 meters (50 feet) from the facility's property line.
3. The inbound/outbound timeframes have been reviewed for consistency. EQ is requesting to be allowed to have 5 consecutive days (except for holidays) to unload inbound waste. EQ is also requesting to allow outbound shipments to be completed within 10 consecutive days of initiating the loading. The expanded timeframes will allow EQ to have additional time for inbound and outbound loads to be properly received and prepared for off-site shipment. EQ understands the Department's concerns and believes that the requested additional time for loading and unloading is consistent with meeting those concerns. Section 14, Pages 4 and 7 have been revised to remove any inconsistencies.
4. Inbound/outbound and transfer facility vehicle/trailers will be marked using appropriate signage. This signage will be readily visible and clearly identify the type of vehicle/trailer it is. Section 2, Page 4 has been revised to reflect the change. Additional clean pages are included due to repagination.
5. Section 5, Page 3 has been revised to clarify the method and schedule for inspecting the safety supply lockers. It is our intention to inspect and inventory the contents of the lockers monthly. The lockers will be sealed and dated after the inspection and inventory has been completed. The seal will be inspected daily and noted on the Facility Inspection Log. It is EQ's belief that this inspection schedule will ensure that all of the lockers contents are in good condition, available for use, and operationally capable. Section 5, Page 3 has been revised and includes a detailed inspection method and revised inspection schedule.
6. Section 10, Page 2 (Table of Contents) has been revised to include all Solid Waste Management Units.

STRIKETHROUGH  
COPY



area.

This application does propose the following changes to the current permit:

1. Moving the 10-Day transfer facility from the Orient Road property to the 8<sup>th</sup> Avenue property. Vehicles/trailers parked in this area will be marked with appropriate readily visible signage as a 10-Day vehicle/trailer to avoid being confused with other vehicles/trailers that may also be located in the same vicinity; and
2. Create a staging area on the 8<sup>th</sup> Avenue property. The staging area would only be used for inbound loads waiting for unloading and receipt, and outbound loads waiting completed transportation paperwork. Vehicles/trailers parked in this area will be marked with appropriate readily visible signage as either a inbound load or a outbound load to avoid being confused with other vehicles/trailers that may also be located in the same vicinity

Vehicles/trailers located in both areas will be parked on a man made impervious surface. Secondary containment will be provided if vehicles/trailers are going to be parked in this area for more than 24-hours. The proposed location of these areas are identified as the Transfer Facility/Staging Area on Figure 5.14.

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



## 5. INSPECTION PLAN

### General

The EQFL facility is regularly inspected for malfunctions and deterioration, operator errors, and discharges, which may cause (or lead to) release of hazardous waste constituents to the environment or a threat to human health. These inspections are intended to identify problems in time to correct them before a release of hazardous waste or constituents occurs. A facility inspection log is maintained to document the results of these inspections.

### Schedule

All monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to human health or environmental hazards will be inspected daily (each operating day). The inspections will be performed by trained EQFL operations personnel. All inspections will be reviewed and approved by a senior EQFL employee (manager, supervisor, or chemist).

The inspector will look for the items listed on the EQFL Facility Inspection Log. All areas subject to spills, such as the loading/unloading and container storage areas, are inspected daily (each operating day). All containers are inspected for container condition, closure, labeling, and aisle space. Housekeeping, and proper storage location in the storage building are also inspected daily. The vehicle loading and unloading areas and transfer facility vehicles and wastes are inspected daily to identify problems. External areas such as the area for storage of empty containers and the stormwater systems (trenches, filter, and retention pond) are inspected daily to identify problems. Safety and emergency equipment is inspected daily for condition, availability, and operations capability. The safety and emergency equipment inspected includes fire control equipment, communication devices, safety showers and eye washes, spill kits, exits, safety supply lockers, fire suppression and alarm systems, and LEL meter and sensors. The contents of the safety supply lockers will be inspected and inventoried monthly. After the content's condition, availability, and operational capability have been deemed satisfactory, a seal indicating the date of the

inspection and inventory will be applied to the door to prevent unauthorized use. The date of inspection and inventory will also be noted on the Facility Inspection Log. The contents of the safety supply lockers are to be used only in the event of an emergency. The seal will be examined daily to ensure that it has not been broken. If the seal is noted as broken during the inspection, the contents of the safety cabinet locker will be re-inspected and re-inventoried to ensure that the content's condition, availability, and operational capability are in satisfactory condition. The date of re-inspection and re-inventory will be noted on the Facility Inspection Log and resealed with the inspection and inventory date. If the seal has not been broken, Section 7.6 of the Facility Inspection Log (Safety Supply Lockers) will be indicated as satisfactory. The waste inventory for each hazard class and bay, to include transfer facility waste, is noted daily on the inspection log.

### **Remedial Actions**

Every unsatisfactory condition noted during the inspection will be immediately corrected if possible. Items not immediately corrected will be noted on the inspection log. Unsatisfactory conditions noted on the inspection log will be corrected within fourteen (14) days. EQFL will submit a written schedule to correct the deficiency to the FDEP should any deficiency not be corrected within fourteen (14) days. Where a hazard is imminent or has already occurred, remedial action will be taken immediately. The EQFL Contingency Plan will be implemented if a fire, explosion, or unplanned release of hazardous waste or hazardous waste constituents occurs to the air, soil, groundwater, or surface water, which could threaten human health or the environment. All remedial actions completed will be noted on the inspection log.

### **Inspection Log**

A copy of the EQFL Inspection Log is included as the following page. Inspections will be recorded on the inspection log. These records will be kept for a minimum of three (3) years from the date of the inspection. The inspection log records include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or remedial actions.

## **SOLID WASTE MANAGEMENT UNITS**

### **(Contents)**

#### SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU #1

SWMU #2

SWMU #3

SWMU #4

SWMU #5

SWMU #6

SWMU #7

SWMU #8

SWMU #9

SWMU #10

SWMU #11

SWMU #12

SWMU #13

SWMU #14

SWMU #15

SWMU #16

SWMU #17

SWMU #18

SWMU SUMMARY



# REPLACEMENT PAGES

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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. A improved secondary containment area is provided on the loading dock side of Bay 2 with a capacity of 10,000 gallons. The capacity of the improved secondary containment is included in the total permitted facility capacity of 50,000 gallons. The capacity is consistent with the physical limitations of the facility and is used throughout this application to determine containment, closure cost, financial assurances, and aisle space requirements. Actual day to day volume is usually less than 25,000 gallons. EQFL will utilize the container arrangement shown on Figure 5.12. 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 5.12) 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.

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### **Schedule**

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**SWMU SUMMARY**



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applicable) will be unloaded within five (5) consecutive calendar days (excluding holidays) of arrival at the facility. Bulk hazardous waste shipments manifested to EQFL will be shipped off-site upon approval from the final disposal facility for acceptance and scheduling of waste. EQFL will notify the DEP if any unforeseen problems require exceeding the original 24 hours.

### **Processing Areas**

Inbound waste shipments may be unloaded into the warehouse to a temporary processing area for obtaining samples and waste verification. The temporary processing area will have separate containment by utilizing a temporary dike, boom or berm. Inbound waste will be stored in the temporary processing area for a maximum of 5 operating days. All applicable requirements such as inspections and operating record will apply to these wastes. The processing area will be designated with a sign.

Temporary processing areas have been identified on Attachment 5.12. The areas are normally utilized as permitted hazardous waste storage and processing areas. A temporary berm or containment will be utilized to designate and contain the temporary processing area when in use. A sign designating "Temporary Processing Area" and "Temporary Processing Start Date \_\_\_\_\_" will also be utilized for each temporary processing area. The temporary processing area, temporary berm or containment will contain the volume of the largest container or 10% of all containers in the temporary area (whichever is greater).

Hazardous waste designated for outbound shipments may be moved to a temporary processing area. Outbound hazardous wastes will be stored a maximum of 10 days in the temporary processing area. All applicable requirements such as inspections and operating records will apply to these hazardous wastes.

### **Loading of Outbound Shipments**

The loading of outbound shipments of hazardous waste will be completed within 10 consecutive working days of initiation of the loading of the outbound shipment.

### **Waste Receipt, Sampling, and QC Analysis**

Waste receipt, sampling, and QC analysis procedures are described in the EQFL Waste Analysis Plan.

### **Waste Storage**

All applicable requirements for waste storage are described in the appropriate section of this permit.

### **Waste Treatment**

Waste treatment (solidification) is described in the Miscellaneous Unit section of this permit.

### **Waste Recontainerization or Consolidation**

Some of the waste received will be recontainerized. In general, recontainerization includes consolidation of like waste into similar size or larger containers. Other recontainerization operations will include paint can processing, aerosol can recycling, empty container and or rag compacting, loading to roll-offs, and loading to tanker truck. All waste transfer and recontainerization is conducted utilizing best management practices.

Hazardous wastes will have already been profiled and approved as described in the EQFL Waste Analysis Plan prior to recontainerization. In addition, each hazardous waste stream will also have 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, recordkeeping, and container management that apply for treatment and storage will also apply for hazardous waste transfer and recontainerization.



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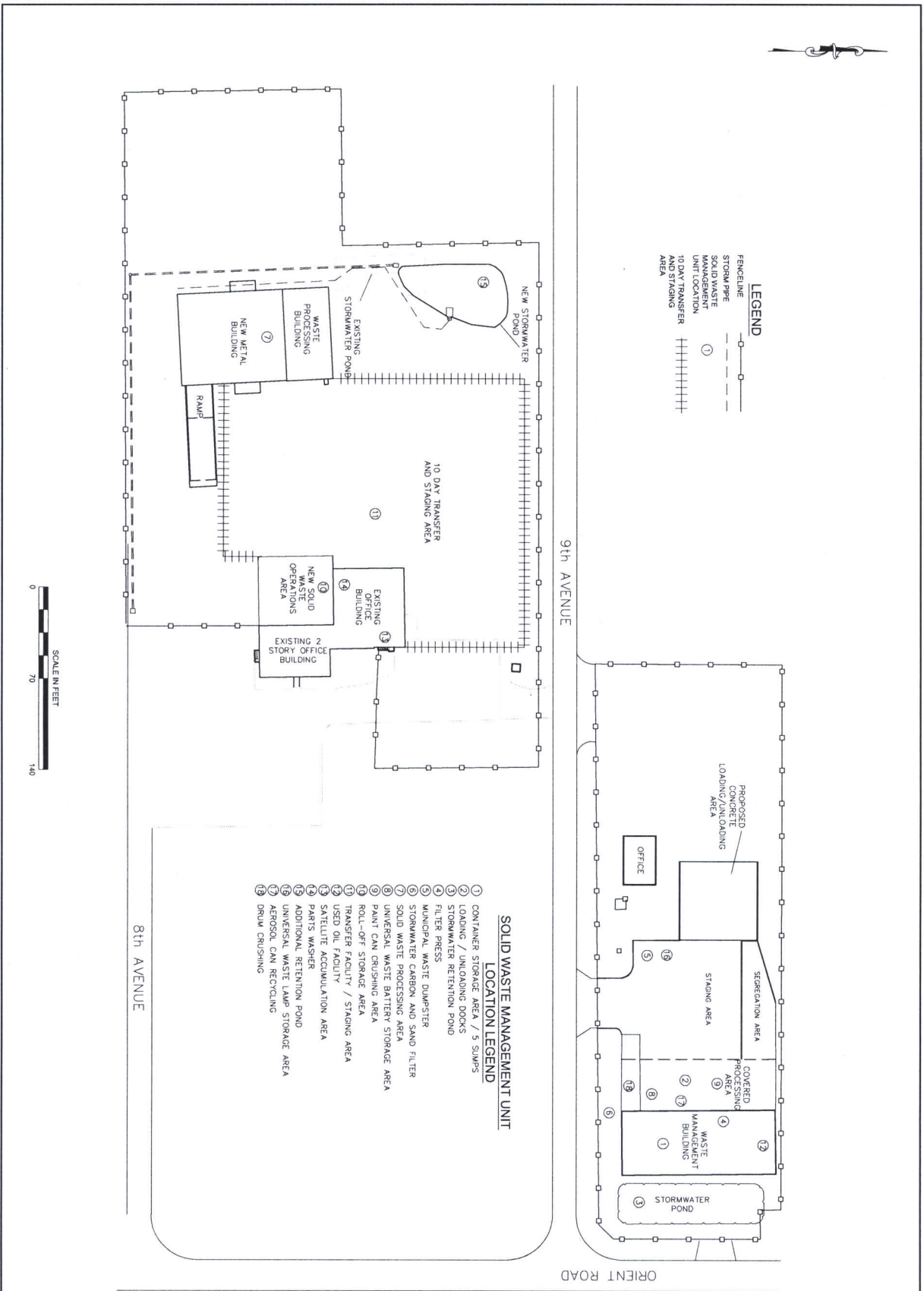
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NO.	REVISION	BY	DATE
1	COMMENTS	DJH	8/8/08
2	UNIT LOCATION & AS-BUILT LOCATION	DJH	04/25/11
3			
4			

<b>FIGURE 5.14</b> <b>SOLID WASTE</b> <b>MANAGEMENT UNITS</b>	<b>KLEINFELDER</b> <small>Smart People. Right Solutions.</small> 5421 BEAUMONT CENTER BLVD., SUITE 605 TAMPA, FLORIDA 33634 PH: (813) 481-6828 FAX: (813) 481-3362 www.kleinfelder.com	PROJECT NO: 045-08-425 DRAWN BY: DJH	ACAD FILE: EQ-FLORIDA_SWMUS-Solid-Waste-Built.dwg CHECKED BY: HW DESIGNED BY: MAS
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THIS DRAWING AND ALL INFORMATION CONTAINED HEREIN IS THE PROPERTY OF KLEINFELDER AND IS NOT TO BE USED BY ANYONE OTHER THAN THE CLIENT FOR THE PROJECT AND WITHOUT THE WRITTEN CONSENT OF KLEINFELDER.	DATE: 08/18/08 SCALE: 1" = 70' FIGURE: 5.14
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