



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Veolia ES Technical Solutions LLC

On-Site Inspection Start Date: 05/10/2011

On-Site Inspection End Date: 05/10/2011

ME ID#: 6716

EPA ID#: FL0000207449

Facility Street Address: 342 Marpan Ln, Tallahassee, Florida 32305-0904

Contact Mailing Address: 342 Marpan Ln, Tallahassee, Florida 32305-0904

County Name: Leon

Contact Phone: (850) 877-8299

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

INSPECTION TYPE:

Follow-Up Inspection for LQG (>1000 kg/month) facility

Follow-Up Inspection for Transporter facility

Follow-Up Inspection for Transfer Facility

Follow-Up Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Aaron Mitchell, Inspector

Other Participants: Randy Williams, Operations Supervisor

LATITUDE / LONGITUDE: Lat 30° 21' 51.8486" / Long 84° 16' 8.358"

SIC CODE: 3399 - Manufacturing - primary metal products, nec

TYPE OF OWNERSHIP: Private

Introduction:

A joint inspection was conducted by the EPA and FDEP at Veolia ES Technical Solutions LLC (Veolia) facility located in Tallahassee, Florida on December 07, 2010 with possible violations of the Resource Conservation and Recovery Act (RCRA) observed and enforcement action initiated.

On May 10, 2011, Department personnel conducted a follow-up inspection to ensure Veolia's return to compliance with RCRA regulations. The inspection was facilitated by Operations Supervisor, Randy Williams.

A. Outside North Storage Area (ONSA):

Veolia has removed all unprocessed materials from the ONSA to the interior of the facility. Glass from broken lamps on the bare ground in the ONSA observed during the December inspection had been removed and processed at the facility. Veolia sampled and analysed the soils in the affected area. The results were received by the Department on January 21, 2011, and found within regulatory limits. The area appeared to be in compliance.

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Attachments:

Outside North Storage



Outside North Storage



Outside North Storage



B. Hazardous Waste Storage :

Hazardous waste containers in this area were dated and labeled. The oldest accumulation date observed was February 15, 2011 and the area appeared to be in compliance.

Attachments:

HW Storage



HW Storage



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C. Loading Dock, Processed Powder Storage, Maintenance:

Veolia has changed its receiving procedures for deliveries from FEDEX. FEDEX deliveries are now primarily taken at the two main docks instead of the ONSA. If a delivery cannot be made at the docking area, it is unloaded in the ONSA and immediately moved inside the building to the appropriate storage area.

Attachments:

FEDEX Shipments



FEDEX Shipments



D. Inbound Universal Waste Storage:

The Inbound Universal Waste Storage area had containers properly closed, labeled, in good condition and appeared to be in compliance.

Attachments:

UW Lamp Storage



UW Lamp Storage



E. Records:

Veolia had a mercury level exceedance for rate samples for mercury reclamation in weeks 43 and 45 due to the preservation materials (ice) melting. The facility has contacted Test America to ensure that samples processed and the analysis results are sent back to Veolia in an expedited timeframe. This expedited procedure now has a turn around time of 3-5 days. This allows Veolia to reprocess materials if necessary to comply with its permit and state/federal regulations.

On March 11, 2011, Veolia contacted the Department via telephone to self-report that a sample of its processed glass from the lamp recycling had exceeded its permitted levels. A written letter detailing this issue was received by the Department on March 22, 2011. The processed glass is contained in two 20-yard roll-offs that due to limited storage capacity had already been shipped out for disposal before the results were known. Department and Veolia personnel discussed this issue at a meeting on March 24, 2011. Since this meeting, Veolia has added two additional

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20-yard roll-offs to the storage area at the facility. Two other roll-offs are kept off-site, but available as needed. This increased holding capacity of six roll-offs has allowed Veolia to ensure compliance with the facility's permit with respect to its residual mercury concentration in its processed glass.

Attachments:

Roll-Offs



Roll-Offs



F. Fluorescent Lamp Processing :

The area appeared to be in compliance.

G. HID Processing:

The area appeared to be in compliance.

H. Retort :

The area appeared to be in compliance.

I. Battery Storage:

The area appeared to be in compliance.

K. Retort Prep Area:

The area appeared to be in compliance.

Conclusion: The facility appeared to be in compliance at the conclusion of this inspection.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

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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.

Aaron Mitchell

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

6/2/2011

DATE

Randy Williams

REPRESENTATIVE NAME

Operations Supervisor

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Veolia Environmental Services

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.