



# Florida Department of Environmental Protection

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

August 12, 2011

**SENT VIA EMAIL**

[rwhittle@perma-fix.com](mailto:rwhittle@perma-fix.com)

Mr. Raymond Whittle, General Manager  
Perma-Fix of Florida, Inc.  
1940 NW 67<sup>th</sup> Place  
Gainesville, Florida 32653

**Re: Perma-Fix of Florida, Inc.  
EPA/DEP ID: FLD 980 711 071  
Alachua County - Hazardous Waste**

Dear Mr. Whittle:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on June 23, 2011. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning hazardous waste management. During the inspection, your facility returned to compliance. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.256.1671.

Sincerely,

Jabe Breland III  
Environmental Specialist III  
Hazardous Waste Section

Enclosure(s)



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Perma-Fix Of Florida Inc  
**On-Site Inspection Start Date:** 06/23/2011      **On-Site Inspection End Date:** 06/23/2011  
**ME ID#:** 50775      **EPA ID#:** FLD980711071  
**Facility Street Address:** 1940 NW 67th PI, Gainesville, Florida 32653-1649  
**Contact Mailing Address:** 1940 NW 67th PI, Gainesville, Florida 32653-1649  
**County Name:** Alachua      **Contact Phone:** (352) 395-1356

**NOTIFIED AS:**

LQG (>1000 kg/month)  
Transporter  
TSD Facility Unit Type(s)  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Generator facility  
Routine Inspection for LQG (>1000 kg/month) facility  
Routine Inspection for Universal Waste Transporter facility  
Routine Inspection for TSD Facility Unit Type(s)  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Hazardous Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Jabe Breland III, Inspector  
Other Participants: Kurt Fogleman, EHS Manager

**LATITUDE / LONGITUDE:** Lat 29° 43' 0.5156" / Long 82° 20' 59.741"

**SIC CODE:** 4953 - Trans. & utilities - refuse systems

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Perma-Fix of Florida, Inc. (Perma-Fix) was inspected on June 23, 2011, by the Department of Environmental Protection (DEP) Hazardous Waste Section as an unannounced compliance inspection. Yasmine Enriquez and Scott Johnson of DEP's Air Section were also present during the inspection.

Perma-Fix is a Large Quantity Generator and a permitted hazardous waste storage facility. The facility's processes include liquid and sludge bulking, scintillation vial and other small container crushing and shredding, repackaging of solid wastes contaminated by hazardous wastes, stabilization of wastes in containers, thermal desorption and/or chemical oxidation, used oil handling, petroleum contact water (PCW) transportation and consolidation and storage of discarded mercury-containing devices. Perma-Fix was issued permit number 17680-010-HC on September 16, 2010. The permit is for the operation of a hazardous waste treatment and storage facility consisting of a tank, two container storage areas, and two miscellaneous treatment units. The facility was last inspected on December 7, 2009. Operations have not changed since then, and the same procedures are in place and being implemented. Descriptions of permitted areas and processes are detailed in previous inspection reports and will not be repeated in this report.

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**Process Description:****PROCESSING AND STORAGE BUILDING**  
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The Processing and Storage Building (PSB) is a permitted hazardous waste container and tank storage area, as well as a fuel-blending location that includes phase separation treatment. The hazardous waste containers that were examined were properly labeled and closed and had been dated with the storage start date. All satellite containers of hazardous waste in the fuel blending section of the permitted storage area were properly closed and labeled. This included one satellite aerosol can waste drum, one drum for storage of pumping equipment, and one drum for solids from the fuel blending process.

A 3,000-gallon AST is located in the approximate center of the permitted container storage area. The tank has appropriate secondary containment and a sump to contain any spillage. At the time of this inspection, the AST was empty and has not been used to store any waste since it was installed.

**TREATMENT AND OPERATIONS BUILDING**  
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The permitted storage area has seven different zones of secondary containment inside the Treatment and Operations Building (TOB). A maximum volume of 35,200 gallons of hazardous waste can be stored in the TOB as stipulated in Attachment B of the permit. Containers were properly labeled, dated, closed, and in the correct zone.

Perma-Fix Analytical Services occupies the southeast corner of the TOB. The laboratory performs fingerprint analyses on each incoming waste stream to confirm that waste received by the facility conforms to the initial waste profile. Laboratory operations generate waste acid, solvents, liquids, glass, and plastic that are managed as hazardous waste and are transferred to the LSF processing area for liquid recovery. The laboratory 90-day accumulation area is located just outside the lab in the east half of the TOB. At the time of the inspection, there were three 55-gallon drums (acid waste, flammable liquid waste, and waste vial solids) that were properly labeled, dated, and closed.

**LSV PROCESSING AND WASTE STORAGE BUILDING**  
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The Waste Storage Warehouse (WSW) contains a permitted hazardous waste container storage area, Liquid Scintillation Fluid (LSF) processing area, Debris Treatment Unit, maintenance shop, and a separate storage area for used oil, oily wastewater, and other non-hazardous wastes.

**WSW Hazardous Waste Container Storage Area**

The hazardous waste containers that were examined were properly labeled and closed, and they had been dated with the storage start date. At the time of the inspection, the facility was not exceeding the maximum volume or the volume limits for each the individual storage zones.

**Liquid Scintillation Fluid (LSF) Processing**

Perma-Fix performs waste processing and liquid bulking for LSF. Scintillation fluids emit traceable amounts of radiation when exposed to a radiation source. These fluids are generally used by hospitals and research institutes as tracer fluids. The LSF contain small amounts of xylene and toluene and may be radioactive. The LSF is therefore regulated under the Resource Conservation and Recovery Act (RCRA) as F003/F005 hazardous waste, and, if radioactive, as a Mixed Waste under RCRA and Nuclear Regulatory Commission (NRC) rules. At the time of inspection, the unit was in operation.

**Maintenance Shop**

The maintenance shop is located in this building and contains one parts washer. Diesel fuel is used as a solvent, generating a non-hazardous waste parts washer fluid. The facility generates less than

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55 gallons per year of this waste stream, which is added to the used oil in the fuel blending area for energy recovery as needed. The facility's used oil filter container and used oil container were properly labeled.

**RECORD REVIEW:**

During the inspection, records documenting the treatment procedures and operation log of the monitoring and safety equipment were reviewed. Based upon the review of these documents, Perma-Fix is meeting the requirements of the specific conditions listed in the permit. In addition, randomly selected records for inbound shipments of waste were reviewed for compliance for required waste screening, selected treatment, and final disposal history. No discrepancies were noted during this record review.

A review of the facility's manifests, biennial report, annual reports of used oil and PCW activities, training records, and container inspection logs revealed no discrepancies. The contingency plan was on-site and up-to-date. A review of the facility's operating log for the TOB revealed that the facility exceeded its storage limit on July 22, 2011, which is a violation of Part II Subpart B.2(8)(c) of the facility's operating permit [403.161, F.S.]. This was immediately addressed, and the facility's total for the next day was below the facility's permitted limit.

Perma-Fix of Florida, Inc. is currently a Large Quantity Generator of hazardous waste and a permitted TSD facility.

Subpart BB records were found to be complete. Subpart BB equipment is used less than 300 hours per year, and therefore must be inspected annually as opposed to monthly. The Subpart BB equipment was inspected on December 29, 2010.

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type:	Violation
Rule:	403.161
Explanation:	The facility failed to comply with Part II Section B.2 (8)(3) of the facility's operating permit.
Corrective Action:	No further action is required. The item was addressed, and the facility was in compliance the next day.

**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
403.161	Checklist Independent Violations	06/23/2011	The facility failed to comply with Part II Section B.2 (8)(3) of the facility's operating permit.

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.

Jabe Breland III

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

DEP

**ORGANIZATION**

8/12/2011

**DATE**

Kurt Fogleman

**REPRESENTATIVE NAME**

EHS Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Perma Fix

**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.