

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 1 6 2011

Received AUG 22 2011

**BSHW** 

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Mr. Timothy Bahr, Administrator Hazardous Waste Program Florida Department of Environmental Protection 600 Blair Stone Road Tallahassee, Florida 32399-2400

AUG 22 2011

SUBJ: RCRA Compliance Evaluation Inspection

Environmental Quality Company-Florida

Tampa, Florida 33619

EPA ID. No.: FLD 981 932 494

RECEIVED

AUG 2 2 2011

Hazardous Waste Regulation

Dear Mr. Bahr:

On April 18, 2011, a Compliance Evaluation Inspection (CEI) was conducted by the United States Environmental Protection Agency and the Florida Department of Environmental Protection (FDEP) at the Environmental Quality Company-Florida in Tampa, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA lead inspection.

Enclosed is the EPA RCRA Site Inspection Report, which indicates that deficiencies of RCRA regulations were discovered.

If you have any questions regarding this matter, please contact Héctor M. Danois, of my staff, by telephone at (404) 562-8556 or by email at danois.hector@epa.gov.

Sincerely,

Larry Lamberth, Chief

South Enforcement and Compliance Section

RCRA and OPA Enforcement and Compliance Branch

Enclosures
Inspection Report

cc: Shannon D. Camp, FDEP SW District



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## <u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Bob Mulholland, General Manager Environmental Quality Company-Florida 7202 East 8<sup>th</sup> Avenue Tampa, Florida 33619

SUBJ: RCRA Compliance Evaluation Inspection

Environmental Quality Company-Florida

Tampa, Florida 33619

EPA ID. No.: FLD 981 932 494

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Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA regulations were discovered. A copy of this report has also been forwarded to FDEP.

If you have any questions regarding this matter, please contact Héctor M. Danois, of my staff, by telephone at (404) 562-8556 or by email at danois.hector@epa.gov.

Sincerely,

Larry Lamberth, Chief

South Enforcement and Compliance Section

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and Compliance Branch

Enclosures
Inspection Report

cc: Shannon D. Camp, FDEP SW District

Tim Bahr, FDEP Tallahassee

## RCRA Inspection Report

## 1) <u>Inspector and Author of Report</u>

Héctor M. Danois Environmental Engineer RCRA Enforcement and Compliance Branch EPA Region 4, AFC - 10<sup>th</sup> Floor 61 Forsyth Street Atlanta, Georgia 30303 (404) 562 - 8556

#### 2) Facility Information

Environmental Quality Company-Florida 7202 East 8<sup>th</sup> Avenue Tampa, Florida 33619

EPA ID. No.: FLD 981 932 494

NAICS: 562211

#### 3) Responsible Official

Mr. Bob Mulholland, General Manager Environmental Quality Company-Florida (813) 319-3410 bob.mulholland@eqonline.com

#### 4) Inspection Participants

Bob Mulholland, Environmental Quality Company-Florida Larry Sinatra, Environmental Quality Company-Florida Shannon Camp, FDEP-SW District Héctor M. Danois, U.S. EPA Region 4

## 5) <u>Date of Inspection</u>

April 18, 2011

## 6) Applicable Regulations

RCRA Sections 3005 and 3007 40 Code of Federal Regulations (C.F.R.) Parts 260 - 266, 268, 270 and 273 Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, and 62-737 Florida Administrative Code (F.A.C.)

## 7) Purpose of Inspection

The purpose of the inspection is to conduct an announced U.S. Environmental Protection Agency Compliance Evaluation Inspection (CEI) and determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

## 8) <u>Facility Description</u>

Environmental Quality Company – Florida (EQ), is a RCRA permitted (34875-HO-007) facility for the storage and treatment of hazardous waste, as well for the storage of TSCA waste, used oil transporter and transfer facility, and for managing solid waste. The facility is also a Large Quantity Generator (LQG), a transporter, a large quantity handler of mercury-containing lamps and devisees, a registered transfer facility for hazardous waste in containers.

Hazardous waste storage is conducted in a 5,866 ft-enclosed building with sealed concrete floors. The permit allows a maximum storage of 50,000 gallons in containers. Storage is allowed in three bays that are separated by concrete block walls and fire doors. Each bay has a 1,001-gallon containment sump for emergency spills. A roofed loading/unloading area is attached to the storage building.

Currently, EQ repackages hazardous wastes that include but are not limited to paint can crushing, aerosol can crushing, etc., in 55-gallon drums, cubic yard containers and roll-offs. EQ has a filter press for the solidification of semi-solid wastes that require further filtration that is rarely used.

EQ employs 30 full-time, 30 part-time employees and it is situated on four acres of land, and a chain link fence surrounds the all-active portions of the facility.

#### 9) Findings

On April 18, 2011, Héctor M. Danois with the EPA, along with Shannon Camp with FDEP, arrived at the facility. At approximately 9:00 a.m., Mr. Sinatra received the inspectors. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit. The following areas were inspected:

#### **Universal Waste Storage**

EQ stores universal waste mercury lamps inside a trailer truck. The trailer is permanently parked across from the Hazardous Waste Storage Building (HWSB). At the time of the inspection, ten boxes of spent lamps that were shrink-wrapped in a pallet and seven boxes of spent lamps were being stored in the trailer. The inspection team noticed that the trailer was open, four boxes were in poor condition and one box was not properly closed (See Figure 1 &2).

Pursuant to F.A.C. 62-730.185(1) - Standards for Universal Waste Management, the Department adopts by reference 40 C.F.R. Part 273 revised as of July 1, 2008. Therefore, EQ is in apparent violation of F.A.C. 62-730.185(1) (40 C.F.R. § 273.33(d)(1)) for failing to properly containerize universal waste lamps in structurally sound containers or packages that prevent breakage and are compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

#### Lower-dock in Bay 3

EQ stores universal waste mercury batteries outside of the HWSB and in front of one of the loading/unloading bays (Bay 3). The area has a sloped concrete floor and at the time of the inspection, the area was storing approximately twenty-five 55-gallon drums containing universal waste batteries. The inspection team noticed that the drums were labeled "Non-RCRA Regulated Waste." Apparently, the transporter (in this case EQ) was covering the universal waste labels after the pick-up of the drums (See Figure 3).

Pursuant to F.A.C. 62-730.185(1) - Standards for Universal Waste Management, the Department adopts by reference 40 C.F.R. Part 273 revised as of July 1, 2008. Therefore, EQ is in apparent violation of F.A.C. 62-730.185(1) (40 C.F.R. '273.34(a)) for failure to label or mark the universal waste to identify the type of universal waste as specified below: Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

#### **Stormwater Treatment Facility**

Run-off from the facility (including sumps and parking lots) is collected, stored and treated (Sand and Carbon filters) before discharge into a culvert before going into a stormwater pond. The filters were last changed on November 11, 2010.

#### **Paint Processing Area**

Outside of the HWSB, and in front of one of the loading/unloading bays were one paint can crusher and two 55-gallon drum aerosol can crushers. This area deals with a lot of the household hazardous waste. Personnel wearing Tyvek personal protection equipment (PPE) were operating this activity. During the inspection, personnel were sorting aerosol cans and crushing them in one of the drum crushers. The inspection team noticed that the air filter from one of aerosol can crushers was damaged (or open) and the other drum crusher was open (See Figures 4 and 5). Additionally, a cubic-yard sack that was storing aerosol cans was open and damaged in a corner of the box.

Pursuant to F.A.C. 62-730.160(1), the Department adopts by reference 40 C.F.R. Part 262 revised as of July 1, 2009, including the Appendix with the exception of 40 C.F.R. 262.34(e) and Subparts I and J. Therefore, EQ is in apparent violation of F.A.C 62-730-160(1) (40 C.F.R. § 265.173(a), as referenced in 40 C.F.R. § 262.34(a)(1)(i)). This regulation requires that containers holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Pursuant to F.A.C. 62-730.160(1), the Department adopts by reference 40 C.F.R. Part 262 revised as of July 1, 2009, including the Appendix with the exception of 40 C.F.R. 262.34(e) and Subparts I and J. Therefore, EQ is in apparent violation of F.A.C 62-730-160(1) (40 C.F.R. § 265.173(b)), as referenced in 40 C.F.R. § 262.34(a)(1)(i)). This regulation requires the containers of accumulated hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak.

As explained before, the facility recycles used aerosol cans by processing them through a 55-gallon drum aerosol can crusher. The can crusher has a filter system which removes Volatile Organic Compounds (VOCs) that is emitted when the cans are depressurized. In accordance with 40 C.F.R. Part 264 Subpart CC defines the filter as a "control device." During the inspection, the filter was damaged and not removing ≥ 95% of VOC.

Pursuant to F.A.C. 62-730.160(1), the Department adopts by reference 40 C.F.R. Part 262 revised as of July 1, 2009, including the Appendix with the exception of 40 C.F.R. 262.34(e) and Subparts I and J. Therefore, EQ is in apparent violation of F.A.C 62-730-160(1) (40 CFR §§ 264.1080 and 264.1086(b), as referenced in 40 C.F.R. § 262.34(a)(1)(i)). This regulation requires the owner or operator shall control air pollutant emissions from each container subject to this section.

#### **Decompressing Area**

During the inspection, EQ had a small tent where they decompress fire extinguishers. The tent was located very close to the property fence. Operators removed the caps from the extinguishers and collected the residue in containers for disposal. The inspection team noticed, near the tent and property line, an aerosol spray can of carburetor cleaner and a 1-gallon jug of denature alcohol. Although, both materials are flammable, after the inspection it was determined that they were not considered hazardous waste.

#### **Hazardous Waste Storage Building**

This is the area where EQ re-containerizes and stores hazardous waste in different size containers. Pursuant to the permit, all storage is in containers and may not exceed 50,000 gallons. Storage is allowed in three bays that are separated by concrete block walls and fire doors. The hazardous waste permit allows EQ to store specific materials in specific bays, as follows:

- Bay 1 Acids, toxic metals, non-flammable solvents and halogens
- Bay 2 Flammable liquids/solids, reactive cyanides, sulfides, metals
- Bay 3 Poisons, oxidizers, caustics

At the time of the inspection, the inspectors broke up into teams and inspected the three bays of hazardous waste container storage. The inspectors noticed in Bay 2, two carts storing a number of unknown hazardous waste containers (See Figure 6). The containers were dated and labeled "hazardous waste." Personnel indicated that the waste was placed on the carts because the material was declared unknown or during consolidation the material would react (bubble, smokes). The materials are left in the carts to conduct testing and determine the proper profile. The oldest waste in the cart was dated 2/11.

40 C.F.R. § 264.177(c) requires a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

Also in Bay 2 and Bay 3, the inspection team found that a number of containers did not have the waste codes (See Figure 7). Additionally, the area was storing two cubic yard cardboard boxes, which stored hazardous waste and was open (See Figure 8).

EQ has failed to adhere to 403.727(1)(c). This condition requires that containers stored at the facility should be marked with the applicable EPA waste identification codes. This is an apparent violation of permit condition S.C.II.22.a.

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In Bay 3, the inspection team found a pallet of hazardous waste material. Some of the containers had some of the material pooled and on top of the containers (See Figure 9).

40 C.F.R. § 264.31 requires that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The inspection team noticed that several containers at the facility were not marked with the date the containers were received at the facility. The containers were located within all three bays, outside in the processing area and a trailer truck in the yard.

40 C.F.R. § 268.50(a)(2)(i) requires an owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks, containers, or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal that each container is clearly marked to identify its contents and the date each period of accumulation begins. This is an apparent violation of permit condition S.C.II.22b.

#### **HWSB Outbound Trucks**

After EQ re-containerizes the material, this is the area where the containers are moved to transport out of the facility. The inspection team found inside the trailers two 1-cubic yard containers and three 55-gallon drums that did not have waste codes. Additionally, the inspection team observed a 55-gallon container which appears to have hazardous waste on the outside of a drum (See Figure 10). Another 55-gallon drum had accumulated some of the material in the bunghole (See Figure 11). Also, the team found a 55-gallon drum that was labeled "Miami-Dade County Solid Waste (See Figure 12), instead of an EQ label.

EQ is in apparent violation of F.A.C. 403.727(1)(c). This condition requires that containers stored at the facility should be marked with the applicable EPA waste identification codes. This is an apparent violation of permit condition S.C.II.22.a.

40 C.F.R. § 262.3 requires that before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must placard or offer the initial transporter the appropriate placards according to Department of Transportation regulations for hazardous materials under 49 CFR part 172, subpart F.

40 C.F.R. § 264.31 requires that the facility must be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

## Trailer Trucks Storage

EQ uses two trailer trucks for temporarily storing containers that during the processing/finger printing the waste, a discrepancy or out- of- dated waste profile is discovered. The trailers have a plastic secondary containment and they appear to be permanent in this location. At the time of the inspection, the inspection team found approximately twenty- seven 55-gallon drums and sixteen 5-gallon containers (See Figure 13). Some of the containers were dated as far back as 2/11. The trailer truck storage is not part of the area permitted to store hazardous waste.

EQ is in apparent violation of 403.727(1)(c). This condition allows containers storage not to exceed 50,000 gallons at the HWSB. Storage of hazardous waste outside the permitted storage building is an apparent violation of permit condition S.C.II.1, as such in apparent violation of 40 C.F.R. Part 270.

#### Laboratory

EQ has a small lab to conduct fingerprinting testing and profile reviewing. At the time of the inspection, the area had various satellite accumulation areas (SAA). One 5-gallon metal bucket was storing rags and one 5-gallon plastic container was storing lab waste. Additionally, EQ keeps lab samples in this area, for up to a month for verification. No deficiencies were observed.

#### Maintenance Area

This is the area where EQ provides basic vehicle maintenance to their 25 car fleet. The used oil is collected in oil pans and drained into 55-gallon drums. At the time of the inspection, the area had two 55-gallon drums of used oil. The inspection team noticed that one of the drums was labeled "Waste Oil" (See Figure 14) and the drain pan used to collect the used oil was not labeled (See Figure 15).

Pursuant to F.A.C. 62-710.401(6) prohibits storage of used oil in tanks or containers unless they are clearly labeled with the words "used oil" and are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage.

#### Recordkeeping

Documents and records that the inspection team reviewed included; contingency plan (1-4-10), manifests (2010-2011), bi-annual reports (2-25-10), personnel hazardous waste management training documentation (6-18-10), certificates and the inspection records for the hazardous waste storage areas. During the review of the incoming manifest, the inspection team noticed that at least three incoming manifest (See Attachment 2) were

observed in which EQ, as the hazardous waste transporter, failed to ensure that the manifest included the transporter name and EPA ID Number. Additionally, the inspection team found that EQ is failing to note the date and nature of the corrective action or repairs in the daily inspection logs.

40 C.F.R. § 263.10(d) requires a transporter of hazardous waste subject to the Federal manifesting requirements of 40 C.F.R. Part 262. This regulation requires a generator who transports, or offers for transport, a hazardous waste for offsite treatment, storage or disposal or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a Manifest on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in Appendix I.

40 C.F.R. § 264.15(d) requires the owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must 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 other remedial actions.

After reviewing daily drum inspection logs, the inspection team was concerned that EQ may be exceeding the maximum quantity of received waste that remains unloaded. Records indicate that the amount often exceeds 10,000 gallons at any one time. It is unclear, if the documented inbound quantities are receipted or not. In addition, the facility's daily counts did not appear to reflect the waste on site. For instance, the facility's waste count on the day of the inspection was conducted after the inspectors finished the facility portion of the inspection. The inspectors did not observe any trucks with inbound waste, only four being loaded for outbound and one storing hazardous waste. However, the facility documented 20,865 gallons of inbound waste.

After the inspection, the inspector contacted EQ in a conference call to discuss these issues, EQ explained that they found errors in the way their inspectors were conducting the inspections. EQ explained that some of the inbound material is placed in the Bays and the records do not accurately reflect the amount of material on the storage area or bays. Additionally, the inspection team noticed that the daily inspections are conducted in the afternoon (See Attachment 3). The permit requires that the inspections shall be conducted at the beginning of the day.

EQ is in apparent violation of F.A.C. 403.727(1)(c). This condition requires the facility to accurately document the inventory of wastes on the daily inventory log. Additionally, the inventory should be done at the opening of each business day as required by S.C.II.17 of the permit.

## 10) Signed

Héctor M. Danois

Environmental Engineer

6-29-11

Date

11) <u>Concurrence</u>

Larry Lamberth, Chief

South Enforcement and Compliance Section

RCRA and OPA Enforcement and Compliance Branch

# Attachment 1 – Photo Log



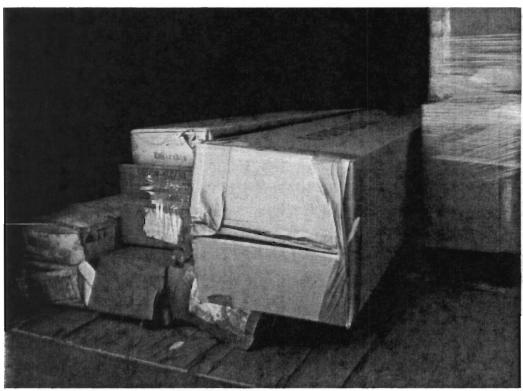


Figure 2 - UW lamps box conditions



Figure 3 - UW Battery container



Figure 4 - Damaged air filter from one of the aerosol cans crusher

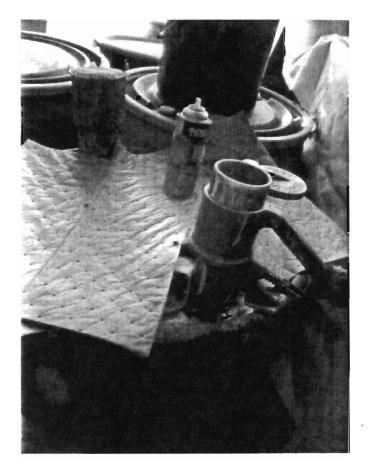


Figure 5 - Open aerosol can crushers drum

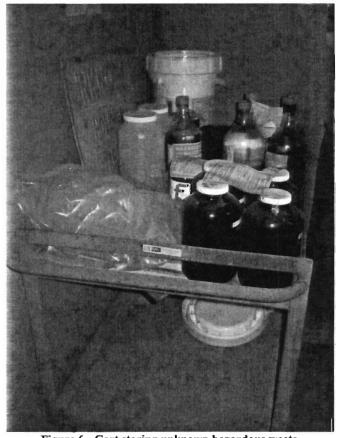


Figure 6 - Cart storing unknown hazardous waste

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Figure 7 - HW label without waste code

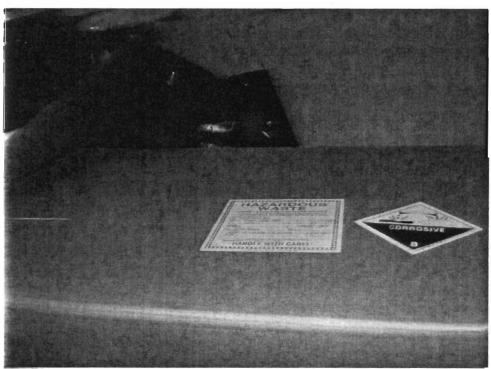


Figure 8 - Open cubic yard container



Figure 9 - Pallet of hazardous waste material with material pooled and on top of the containers

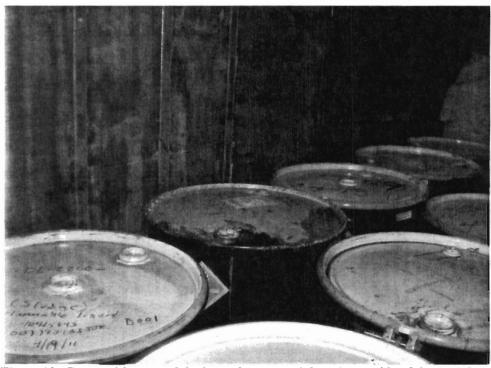


Figure 10 - Drum with some of the hazardous material on the outside of the container

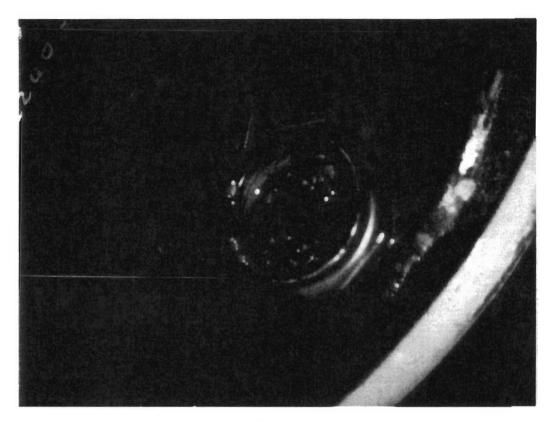


Figure 11 - 55-gallon drum had accumulated some of the hazardous material in the bunghole



Figure 12 - Container at the Outbound Trailer showing improper label

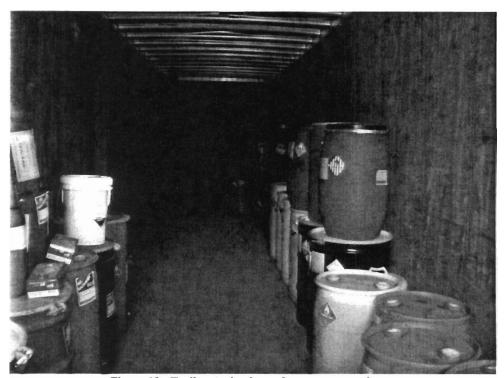


Figure 13 - Trailer storing hazardous waste containers

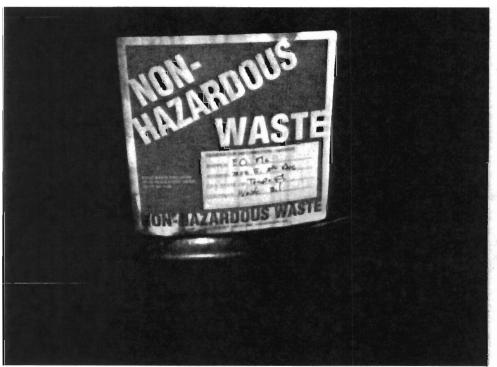


Figure 14 - Oil drain pan not labeled



Figure 15 - Oil drain pan not labeled

Attachment 2 - Manifest

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1	1	TAMPA, FL 336									
		Generator's Phone:	(813) 825 1578				U.S. EPA ID	Amber			
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		7. Transporter 2 Company Name					U.S. EPAID N	emper.			
		8. Designated Facility Name and	Site Address EQ FLORIDA, IN	C.			U.S. EPA ID N	fumber			
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			3) 823-5302								
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	8. De	signated Facility Name an	d Site Address	EQ FLORIDA, INC.					U.S. EPA 10 N		
Ш		002 NORTH O							FLD	981 93	32 494
П		AMPA, FL 336		_					1		
11			3) 623-5302	Shipping Name, Hazard Class, ID N	humber		10. Conta	inem	11 7-1-1	10.15	
	9a. ⊬M	and Packing Group (if:	eny))	<u> </u>			No.	Туре	11. Total Quantity	12. Unit Wt_Vol.	13. Waste Codes
18	X	" UN1993, RQ, V ERG #128	VASTE FLAM	MABLE LIQUIDS, N.O.S. (	(XYLENE), 3, F	GN,			i	1	D001 F003
15	1	ENG FIZE					002	DE	0110	6-	
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П		ipacial Handling Instruction		ormanon ASTE 2. AXT 002 / FOR	MAI IN WASTI	/ FRO	M OPERATI	ON 3 A	XT 005 / MET	THANCE	/ ACETIC ACID MIX /
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П											
П	15.	GENERATOR'S/OFFERO	R'S CERTIFICATE	Mi: I hereby declare that the conten	ts of this consignmen	nt are fully :	and accurately do	scribed abov	e by the proper shi	ipping name	e. and are classified, packaged,
П	l			espects in proper condition for trans signment conform to the terms of the				ionai governs	nental regulations.	If export sh	ipment and I sin the Primary
П				identified in 40 CFR 252.27(a) (if I i				all quantity go	nerator) is true.		
П	Gene	rators/Otteror's Printed/Ty	ped Name	link.		gneture		$\overline{z}$			Month Day Year
Į.			AYA	KAKUA _			rec	<u></u>			3/4/1
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_	_	sporter signature (for expo					Date leav	ng V.S.:			
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5	\" <b>-</b> "				ı	унич	Paul	1			Month Cay Year
翠	Ter	PAUL Bra porter 2 Printed/Typed Na				kanatura	and	DA	741		Month Day Year
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≥	16b.	Alternate Facility (or Gener	nator)						U.S. EPA ID N	umber	
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¥	Facili	ty's Phone:									
恒	18c.	Signature of Alternate Faci	ity (or Generator)								Month Day Year
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DESIGNATED FACILITY		szerdous Waste Report M	anagement Method	Codes (J.s., codes for hazerdous we		ial, and rec	ycling systems)				
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	20.0		r Operator: Certifica	tion of receipt of hazardous material	s covered by the me	_		ı 18a			
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ΕP	Form	18700-22 (Rev. 3-05)	Previous editions	are obsolete.		DESIG	NATED FA	CILITY	TO DESTIN	ATION	STATE (IF REQUIRED)

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T	U	NFORM HAZARDOUS	1. Generator 1D Nu	mber	2	. Page 1 of	3. Emergenc	Respons	se Phone	4. Mizrifant	770	991	0 11	V
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11		TAMPA FL 336												
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П			n 623 <u>-5302</u>											
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	15.	GENERATORSIOFFERO	R'S CERTIFICATION	N: I hereby declare that t	he contents of this co	nsignment ar	re fully and ac	curately d	escribed abov	n by the proper sh	ioping name	, and pre class	fied, package	ed.
11		marked and labeled/places Exporter, I cardly that the o							conal govern	pental regulations.	If expart sh	ipment and I ar	s the Primary	' ]
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置		Transporter Acknowledgment		eks								- No.	- 6	
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FACILITY										ı				ļ
	_	zilly's Phone: :, Signature of Alternate Facili	ty (or Generator)									Mont	n Day	Year
3												- 1	1 1	
DESIGNATED	19.	Hezardous Weste Report Me	ragement Method (	Codes (i.e., codes for haz	articus waste treatme		and recycling	systems)						
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11	20	H141 Designated Facility Quiper or	Operator: Cartificat	H141	a materials covered t	w the manife	H14		m (Ba)					
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EP#	Fo	m 8700-22 (Rev. 3-05) P	revious editions a	re obsolete.		Di	ESIGNA"	ED F	ACILITY	TO DESTIN	ATION	STATE (	FREQU	IRED)

Attachment 3 – Daily Log Inspections

EQ 2002 North Orient Road Tampa, FL 33619 DAILY DRUM INSPECTION REPORT

Name of Inspector:	David Green																
Date:	4/19/2011																
Time:	13:40	r	UP		L/P		L/P		Butk		Bulk		Bulk		Bulk		
			55 Gal	(input here)	30 GAL		5 GAL	(imput here)	yd3		55 Gal	(input hore)	30 GAL		5 GAL	TOTAL	
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Bay 1	ACIDS	29		11		36		0		3		0	1	3		953	
Bay 2	FLAMMABLE	46	100	14	, i	30		7		14		2	1. Sab	0	100	3504	
Bay 2	FLAMMABLE SOLID	17	144	4	1.	21		2		0	7.7.2	٥	1.1	D	112	866	
Bay 2	REACTIVE	7		23		29		0		0		0	1300	0		451	
Bay 2	AERO\$OLS	41	18 P.	6	.,÷	16		24		0	14	٥		0		6198	
Bay 3	OXIDIZERS	29	3.0	9	:	15		0	1	4		0		٥		929	
Bay 3	ALKALINES	28		4		5		3		2	* :	0	1 1 1 1 1 1	2		1394	
Bay 3	POISONS	55	9.8	16		43	٠.	1		3	1	0	11.	0		1747	
Bay 3	NON-REG	46	1.3	. 2	100	43		-1 6		2.40	Mari	13	25.00	. 4		4958	
Inbound Bulk Shipment	BULK SHIPMENT	0				0		₩ 6		341	100	19	14.7	44	1.7.	20865	
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EQ 2002 North Orient Road Tampa, FL 33619 DAILY DRUM INSPECTION REPORT

Name of Inspector:	Justin Anderson 🤝								*									
Date:	4/20/2011																	
Time:	5.00	4"		L/P		L₽		L/P		Bulk		Bulk		Bulk		Bulk		
Bay 1	ORM			55 Gal	(input here)		ı	5 GAL	(input here)	yd3		55 Gai	(input here)	30 GAL		5 GAL	TOTAL	
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Bay 2	FLAMMABLE		11		10		39		0		5		0	1.7	۵		683	
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Bay 2	REACTIVE		19	STEEL STEEL	7		5		3		0		0		0	100	1127	
Bay 2	AEROSOLS		6		15	• •	16	19	0		0		0		0	13.7	317	
Bay 3	OXIDIZERS		30		0		39	•	35		0	***	0		O	1	8378	
Bay 3	ALKALINES		35		9		12		0		4		1		0	30.7	1073	
Bay 3	POISONS		15 34	101	2		0		2		1	4	0		O		817	
Bay 3	NON-REG				19		54	- F	1		2		0	\$1. 40° c	O	G.	1327	
Inbound Bulk Shipment	BULK SHIPMENT		49				89		/		3		3		12		3112	
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EQ 2002 North Orient Road Tampa, FL 33619 DAILY DRUM INSPECTION REPORT

Name of Inspector:	David Green															
Date:	12\17\2010															
Time:	9:00		L∕P		Ľ₽		U₽		Bulk		Bulk		Bulk		Buik	
			55 Gal	(mpul hyre)	30 GAL		5 GAL	(input here)	yd3		55 Gal	(mpi4 frem	) 30 GAL		6 GAL	TOTAL
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Bay 2	FLAMMABLE SOLID	6	216	3	1.00	15	150	3		0		D		۵	E 10	843
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Bay 2	AEROSOLS	20	170 m	18		47	Yes	61	を行う	0		0	3900	0	30	14112
Bay 3	OXIDIZERS	28	100	11	4.0	5	2.0	0	(学)	4	E 400 (15	7	200	1	N565	1126
Bay 3	ALKALINES	18	4 50	4	2.8	4		2	11	2	165	O		O		962
Bay 3	POISONS	29	180	23	1,500	20	300	1	100	0		2	3	0	202	1153
Bay 3	NON-REG	20	21,71	2.	200	25	50.5	7	27.5	38	1	3	湖南层	- 6	104	4222
Inbound Bulk Shipment		Q.	Ę	. 0	A. St.	0		4 9		185	310.75	31		<b>5</b> 3	45 6B	11370
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EQ 2002 North Orient Road Tampa, FL 33619 DAILY DRUM INSPECTION REPORT

Name of Inspector:  Bay 1 Bay 1 Bay 2 Bay 2 Bay 2 Bay 2 Bay 3 Bay 3 Bay 3 Bay 3 Inbound Bulk Shipment Outbound Bulk Shipment	David Green 11/18/2010 8:00p.m  ORM ACIDS FLAMMABLE FLAMMABLE SOLID REACTIVE AEROSOLS OXIDIZERS ALKALINES POISONS NON-REG BULK SHIPMENT BULK SHIPMENT	16 19 27 5 2 75 28 16 21 25 0	UP 55 Gal 220 - 1880 1905 1905 1905 1905 1905 1905 1905 190	(Input have 5 7 9 4 20 14 11 10 12 5 0 0	19 30 GAL 155 1 20 20 20 20 20 20 20 20 20 20 20 20 20	9 26 19 20 7 42 7 8 22 5 0	LIP 5 GAL 18 22 19 10 10 10 10 10 10 10 10 10 10 10 10 10	3 3 2 1 0 64 0 3 1 6 6 0 5	Bulk yd3 660 860 440 220 14080 0 660 220 320	0 6 0 0 3 2 1 107 321 271	Bulk 55 Gal 0 230 230 230 0 30 10 655 110 555 885 7655 17655	(input here 2 1 0 0 2 0 0 0 0 3 1 1 27 1	Bulk 30 GAL 30 GAL 0 30 F 10 12 12 12 12 12 12 12 12 12 12 12 12 12	2 0 0 0 0 0 0 0 0 0 0 6 16 6 16 0	Bulk 5 GAL 10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	TOTAL 1123 1529 1447 404 334 15818 860 1216 871 7940 18770 16255
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EQ 2002 North Orient Road Tampa, FL 33619 DAILY DRUM INSPECTION REPORT

Name of Inspector:	David Green
Date:	11/26/2010
Time:	2:30 P M

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Bay 1	ACIDS		22	22/2014	12		38		3		7	20536		4	,	813 5	
Bay 2	FLAMMABLE		32		10		33		5		42				2	25	1718
Bay 2	FLAMMABLE SOLID		2		2			37.5	)	<b>新州</b>	13	Capacita Sec	1	1	9	45	2706
Bay 2	REACTIVE		3	The state of the s	3	and the second	18	31.2	2		0		O	120035	۵	0.	569
Bay 2			2	<b>产能设置</b>	20	SECTION.	13		0		0	B 102	2	60	2	10	356
	AEROSOLS		15	. 公司司書	16	F-11 (5)	37	ALVARUS.	35	2700 E	0	在。在	0	<b>≤</b> -0.23	0	0 '	8250
Bay 3	OXIDIZERS		28	1.1000	13	<b>3.71.5</b> (18)	9		0	Notes	3	W 465	Ð	0.3	D	0.0	886
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Bay 3	POISONS		24	480	12	100	34		1		'n		2		0		
Bay 3	NON-REG		12		5	<b>新城</b> 海和	26		0	1971	40		3	5 20 30	U	· U	990
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