



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

AUG 16 2011

Received
AUG 22 2011
BSHW

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
RCRA

AUG 22 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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

AUG 16 2011

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

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

SUBJ: RCRA Compliance Evaluation Inspection
Environmental Quality Company-Florida
Tampa, Florida 33619
EPA ID. No.: FLD 981 932 494

Dear Mr. Mulholland:

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 facility 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. 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,

A handwritten signature in black ink, appearing to read "Larry Lamberth".

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
Tim Bahr, FDEP Tallahassee

RCRA Inspection Report

1) Inspector and Author of Report

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

2) Facility Information

Environmental Quality Company-Florida
7202 East 8th 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) Date of Inspection

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) Facility Description

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 $\geq 95\%$ 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.

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.

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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 bung hole (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.

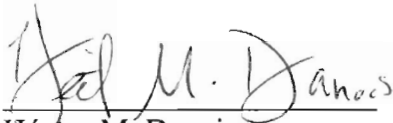
40 C.F.R. § 264.15(d) requires the owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation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

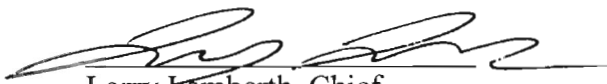


Héctor M. Danois
Environmental Engineer

6-29-11

Date

11) Concurrence



Larry Lamberth, Chief
South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

08/15/11

Date

Attachment 1 – Photo Log



Figure 1 - Trailer storing UW lamps

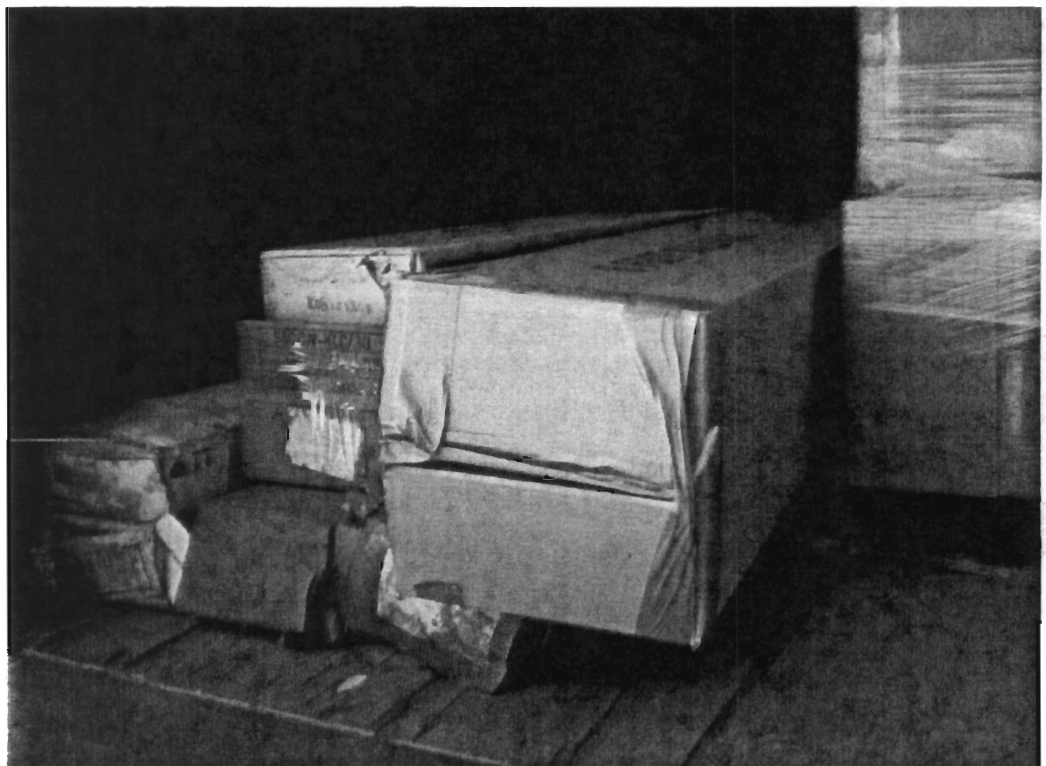


Figure 2 - UW lamps box conditions



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

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME: EQ FLORIDA, INC.
ADDRESS: 2002 N. ORIENT ROAD PHONE: (813) 623-5302
CITY: TAMPA STATE: FL ZIP: 33619
MANIFEST TRACKING NO.: _____ ACCUMULATION START DATE: 1/8/14
EPA ID NO.: FLD981932494 EPA WASTE NO.: _____
UN3262, Corrosive solid, basic, inorganic, n.o.s., 8, PGII, ERG
#154
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
Appr# **BASIC SOL-BASIC SOLIDS**
HANDLE WITH CARE!
STYLE CPWMB7
LABELMASTER® (800) 621-5808 www.labelmaster.com

Figure 7 - HW label without waste code

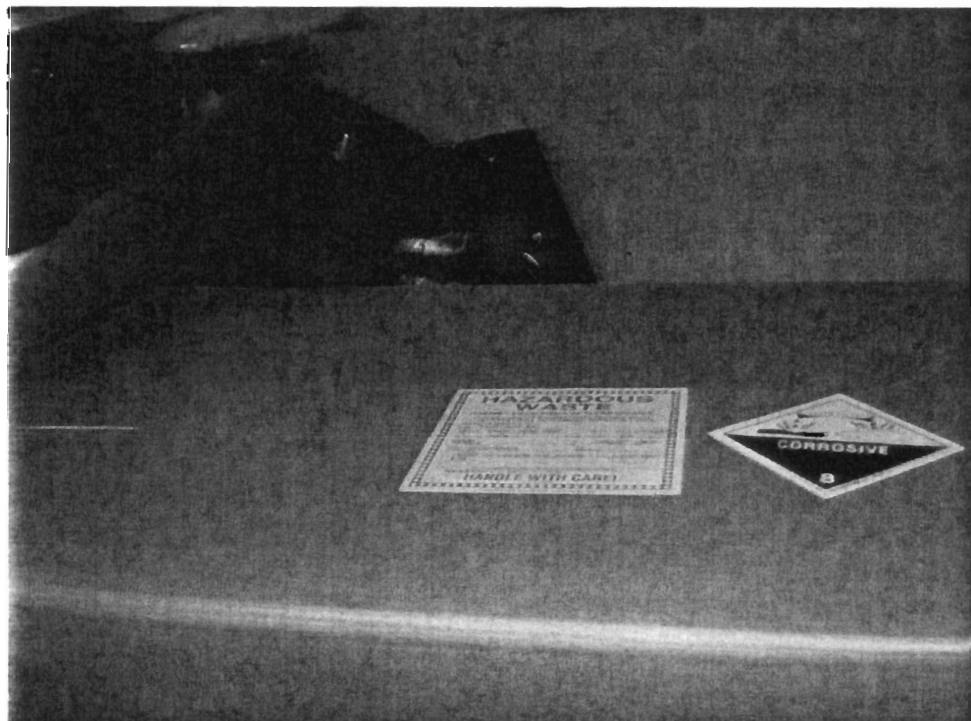


Figure 8 - Open cubic yard container



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 bung hole

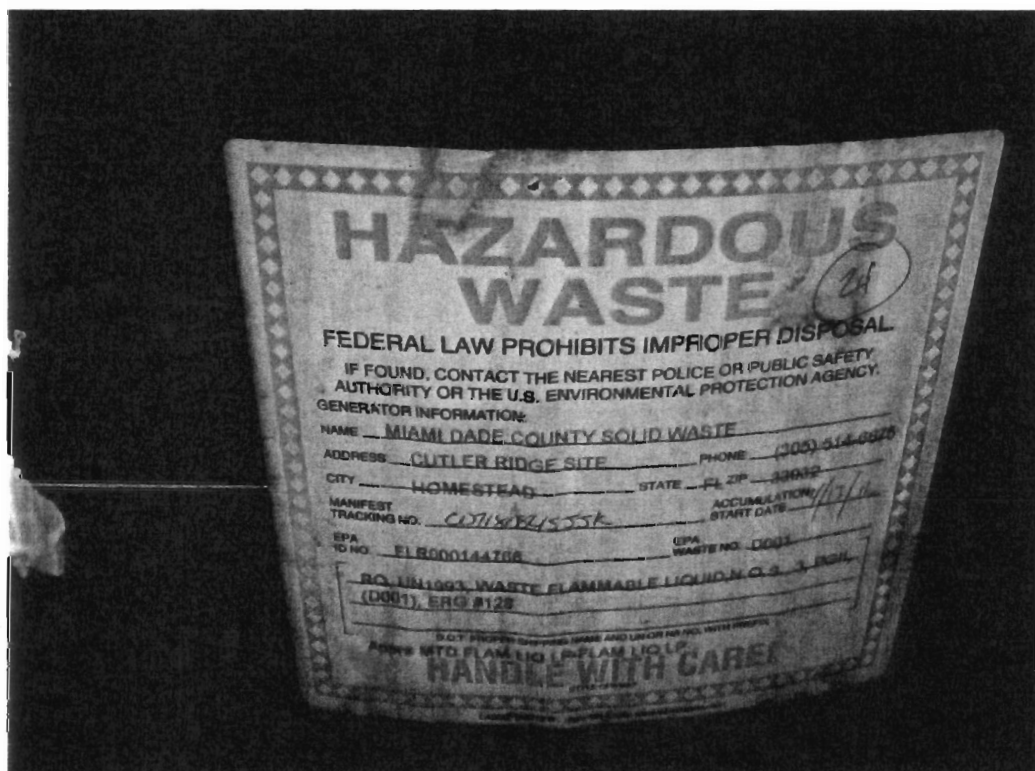


Figure 12 - Container at the Outbound Trailer showing improper label



Figure 13 - Trailer storing hazardous waste containers

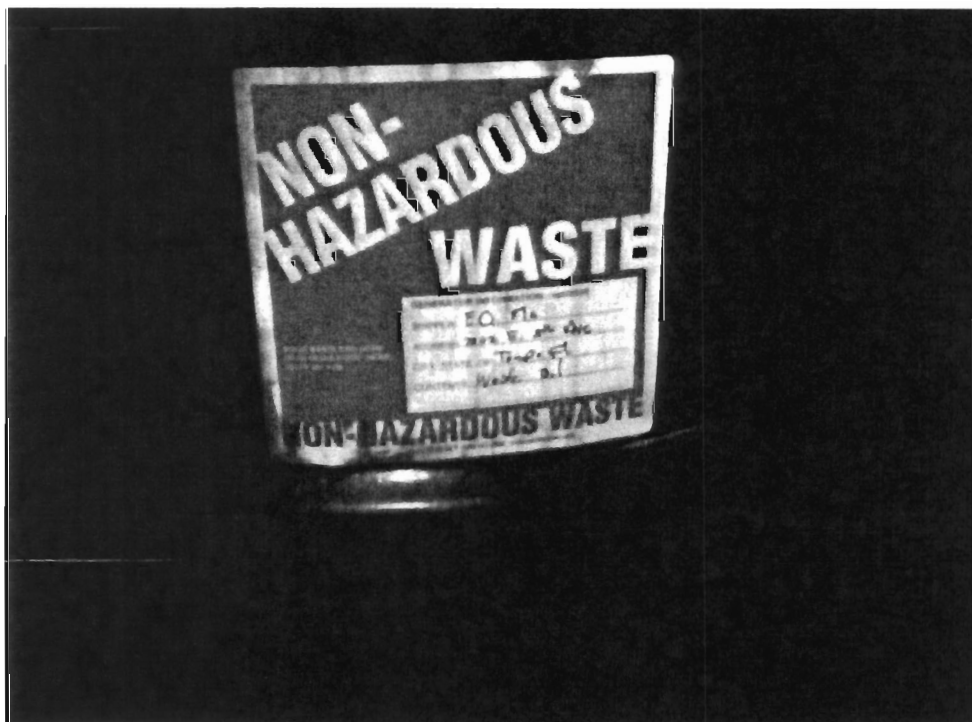


Figure 14 - Oil drain pan not labeled



Figure 15 - Oil drain pan not labeled

Attachment 2 - Manifest

148141

Please print or type. (Form designed for use on-site (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR 000 128 702	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Manifest Tracking Number 007799732 JJK			
5. Generator's Name and Mailing Address AMERIPATH CENTRAL FLORIDA 10500 UNIVERSITY CENTER DR. SUITE 200 TAMPA, FL 33612 Generator's Phone: (813) 825-1576				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address EQ FLORIDA, INC. 2002 NORTH ORIENT ROAD TAMPA, FL 33619 Facility's Phone: (813) 823-5302				U.S. EPA ID Number FLD 981 932 494				
9a. Hld	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN1993, RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (XYLENE), 3, PGII, ERG #128	002	DF	0.110	G	D001	F003	
X	2. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. (FORMALIN), 3, PGII, ERG #128	001	DF	00.55	G	D001		
X	3. UN2924, WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (METHANOL), 3, PGII, ERG #132	001	DF	00.55	G	D001	D002	
	4.							
14. Special Handling Instructions and Additional Information 1. AXT 001 / XYLENE ALCOHOL WASTE 2. AXT 002 / FORMALIN WASTE / FROM OPERATION 3. AXT 005 / METHANOL / ACETIC ACID MIX / FROM OPERATION								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name CANA KALVA				Signature <i>[Signature]</i>		Month Day Year 3 7 11		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:				
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name PAUL BROWN				Signature Paul Brown		Month Day Year 3 7 11		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Box to should read EQ Industrial Services MIO 000263871								
18b. Alternate Facility (or Generator)				U.S. EPA ID Number				
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)				Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H141		2. H141		3. H141		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name Scott R. Wimmer				Signature <i>[Signature]</i>		Month Day Year 03 07 11		

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

148735

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR 000 128 702	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Manifest Tracking Number 007799791 JJK	
5. Generator's Name and Mailing Address AMERIPATH CENTRAL FLORIDA 10500 UNIVERSITY CENTER DR. SUITE 200 TAMPA, FL 33612				Generator's Site Address (if different than mailing address)		
Generator's Phone: (813) 825-1578				U.S. EPA ID Number		
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address EQ FLORIDA, INC. 2002 NORTH ORIENT ROAD TAMPA, FL 33619				U.S. EPA ID Number FLD 981 832 484		
Facility's Phone: (813) 823-5302						
9a. HWM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes
		No.	Type			
X	1. UN1903, RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (XYLENE), 3, PGII, ERG #128	002	DF	0110	G	D001 F003
X	2. UN1908, WASTE FLAMMABLE LIQUIDS, N.O.S. (FORMALIN), 3, PGII, ERG #128 <i>DID NOT SHIP</i>					D001
X	3. UN1284, WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (METHANOL), 3, PGII, ERG #128 <i>DID NOT SHIP</i>					D001 D002
	4.					
14. Special Handling Instructions and Additional Information 1. AXT 001 / XYLENE ALCOHOL WASTE 2. AXT 002 / FORMALIN WASTE / FROM OPERATION 3. AXT 005 / METHANOL / ACETIC ACID MIX / FROM OPERATION						
15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name CAYLA KELVA				Signature <i>[Signature]</i>		Month Day Year 3 14 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name PAUL BROWN				Signature <i>[Signature]</i>		Month Day Year 3 14 11
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Box 6 should read EQ Industrial Services MI0000263871						
18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____						
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.	H141	2.	H141	3.	H141	4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name Scott R. Wimmer				Signature <i>[Signature]</i>		Month Day Year 03 14 11

149324

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR 000 128 702	2. Page 1 of 1	3. Emergency Response Phone (800) 535-5053	4. Manifest Tracking Number 007799910 JJK
5. Generator's Name and Mailing Address AMERIPATH CENTRAL FLORIDA 10500 UNIVERSITY CENTER DR. SUITE 200 TAMPA, FL 33612 Generator's Phone: (813) 625-1578					
6. Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES				U.S. EPA ID Number MIO 000 283 871	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address EQ FLORIDA, INC. 2002 NORTH ORIENT ROAD TAMPA, FL 33619 Facility's Phone: (813) 623-5302				U.S. EPA ID Number FLD 981 932 494	
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity
	X	1. RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. (XYLENE, ETHANOL), 3, PGII, (D001, F003), ERG #12II	002 DF		0110 G
	X	2. RQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. (FORMALIN), 3, PGII, (D001), ERG #12II	001 DF		0055 G
	X	3. UN2034, WASTE FLAMMABLE LIQUIDS, CORROSIVE, N.O.S. (METHANOL), 3, PGII, ERG #13II DID NOT SHIP			
13. Waste Codes D001 F003 D001 D001 D002 (P3)					
14. Special Handling Instructions and Additional Information 1. AXT 001 / XYLENE ALCOHOL WASTE 2. AXT 002 / FORMALIN WASTE / FROM OPERATION 3. AXT 005 / METHANOL / ACETIC ACID MIX / FROM OPERATION					
15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name JASON L. MOLNAR Signature Jason L. Molnar Month Day Year 3 21 11					
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name PAUL BROWN Signature Paul Brown Month Day Year 3 21 11 Transporter 2 Printed/Typed Name Signature Month Day Year					
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. H141 3. H141 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 19a Printed/Typed Name Chris Conklin Signature Chris Conklin Month Day Year 13 21 11					

Attachment 3 – Daily Log Inspections

EQ

Tampa, FL 33619

DAILY DRUM INSPECTION REPORT

Date: 4/19/2011

Time: 13:40		L/P		L/P		L/P		Bulk		Bulk		Bulk		Bulk		TOTAL
		55 Gal	(input here)	30 GAL		5 GAL	(input here)	yd3		55 Gal	(input here)	30 GAL		5 GAL		
Bay 1	ORM	16	3	27	1	1	3	1	0	0	3	0	682			
Bay 1	ACIDS	29	11	36	0	3	0	3	0	3	953					
Bay 2	FLAMMABLE	46	14	30	7	14	2	0	3504							
Bay 2	FLAMMABLE SOLID	17	4	21	2	0	0	0	866							
Bay 2	REACTIVE	7	23	29	0	0	0	0	451							
Bay 2	AEROSOLS	41	6	16	24	0	0	0	6198							
Bay 3	OXIDIZERS	29	9	15	0	4	0	0	929							
Bay 3	ALKALINES	28	4	5	3	2	0	2	1394							
Bay 3	POISONS	55	16	43	1	3	0	0	1747							
Bay 3	NON-REG	46	2	43	6	40	13	4	4958							
Inbound Bulk Shipment	BULK SHIPMENT	0	0	0	6	341	19	44	20865							
Outbound Bulk Shipment	BULK SHIPMENT	8	6	24	11	184	0	24	12934							

55481

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

Name of Inspector: Justin Anderson
 Date: 4/20/2011
 Time: 5:00

		L/P		L/P		L/P		Bulk		Bulk		Bulk		Bulk		TOTAL
		55 Gal	(input here)	30 GAL		5 GAL	(input here)	yd3		55 Gal	(input here)	30 GAL		5 GAL		
Bay 1	ORM	0		5	11		0		1		0		0			132
Bay 1	ACIDS	11		10	39		0		5		0		0			683
Bay 2	FLAMMABLE	38		32	12		2		7		0		0			1961
Bay 2	FLAMMABLE SOLID	19		7	5		3		0		0		0			1127
Bay 2	REACTIVE	6		15	16		0		0		0		0			317
Bay 2	AEROSOLS	30		0	39		35		0		0		0			8378
Bay 3	OXIDIZERS	35		9	12		0		4		1		0			1073
Bay 3	ALKALINES	15		2	0		2		1		0		0			817
Bay 3	POISONS	34		19	54		1		2		0		0			1327
Bay 3	NON-REG	49		9	89		7		3		3		12			3112
Inbound Bulk Shipment	BULK SHIPMENT	0		0	0		10		78		16		73			7335
Outbound Bulk Shipment	BULK SHIPMENT	97		21	45		21		79		4		0			11346

27161

37608

