



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Perma-Fix Of Florida Inc

**On-Site Inspection Start Date:** 11/15/2011

**On-Site Inspection End Date:** 11/15/2011

**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 TSD Facility Unit Type(s)

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 Used Oil Transfer 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 November 15, 2011, as an unannounced hazardous waste compliance inspection. This inspection was conducted jointly with Tony Jenkins of the Environmental Protection Agency (EPA). Heather Hahn, DEP Inspector, also participated in the inspection.

An EPA inspection report will be issued separately.

**Process Description:**

**PROCESSING AND STORAGE BUILDING**

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

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from the fuel blending process.

## TREATMENT AND OPERATIONS BUILDING

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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 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 of 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 not in operation, but was last operated the previous week.

### 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 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, and annual reports of used oil and PCW activities, revealed no discrepancies. The contingency plan was on-site and up-to-date. Annual personnel training records were reviewed and were a month overdue [40 CFR 264.16(c)]. The facility's last training was in October of 2010. The facility should annually renew its hazardous waste personnel training. Weekly container inspection logs for the 90-day containers in the TOB did not have the time of day and the name of the inspector [Section 62-730.160(6), FAC]. Subpart BB records were inspected earlier this year and were in compliance, and are not due for re-inspection until December 2011.

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

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**Facility Information:**

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's PF II unit was not in operation, but the facility may use it in the future. The facility's hazardous waste tank has not been used since its installation.

The facility was last inspected on June 23, 2011. 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.

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

Type: Violation  
Rule: 62-730.160(6)  
Explanation: The facility was documenting its weekly inspections for its 90-day containers for the Lab, but did not include the time of day or the name of the inspector.  
Corrective Action: The facility sent documentation to the DEP on 11/17/2011, returning to compliance.

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Type: Violation  
Rule: 264.16(c)  
Explanation: The facility did not renew its hazardous waste personnel training in time to meet the annual requirement.  
Corrective Action: No further action is required. The facility has since completed its training. The facility should renew its training every 12 months.

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

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
62-730.160(6)		11/15/2011	The facility was documenting its weekly inspections for its 90-day containers for the Lab, but did not include the time of day or the name of the inspector.
264.16(c)		11/15/2011	The facility did not renew its hazardous waste personnel training in time to meet the annual requirement.

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**

1/9/2012

**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.