



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Veolia ES Technical Solutions LLC
On-Site Inspection Start Date: 01/13/2012 **On-Site Inspection End Date:** 01/13/2012
ME ID#: 6716 **EPA ID#:** FL0000207449
Facility Street Address: 342 Marpan Ln, Tallahassee, Florida 32305-0904
Contact Mailing Address: 342 Marpan Ln, Tallahassee, Florida 32305-0904
County Name: Leon **Contact Phone:** (850) 877-8299

NOTIFIED AS:

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

INSPECTION TYPE:

File Review Inspection for LQG (>1000 kg/month) facility
File Review Inspection for Transporter facility
File Review Inspection for Transfer Facility
File Review Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Aaron Mitchell, Inspector
Other Participants: Linda Dunwoody, Operations Manager

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

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

TYPE OF OWNERSHIP: Private

Introduction:

Veolia Environmental Technical Solutions L.L.C.(Veolia), is a mercury (Hg) reclamation facility located in Tallahassee, Florida. The facility has been in operation at their present location since 1995. A joint EPA and FDEP inspection was conducted on December 06, 2010 which revealed violations of Resource Conservation and Recovery Act. Enforcement action was taken by FDEP and a subsequent inspection on May 17, 2011, confirmed the facility to have returned to compliance.

Process Description:

Department personnel Aaron Mitchell, received a phone call on January 13, 2012, from Veolia Operations Manager, Linda Dunwoody, in regards to a Hg residual exceedance in their processed glass from the Hg reclamation process. The discovery of the exceedance was made during the facility's end of year annual review of data from test samples. A subsequent email was sent the same day detailing the event timeline along with attached test sample results and spreadsheet totals for the calendar year 2011.

A review of the emailed information showed that the original sample results were 5.3 mg/kg Hg on April 11, 2011. On April 15, 2011, a retest was requested and the results reported as 6.3 mg/kg Hg. Both samples were an exceedance of the Permit Specific Condition #15 weekly sample limit of 5 mg/kg Hg.

Inspection Date: 01/13/2012

Permit Specific Condition #18 requirements for this roll-off of processed glass were overlooked during this timeframe due to the construction of extra storage/laydown space for two processed glass roll-offs. The laydown concrete pad was physically being expanded to accommodate two additional roll-offs for processed glass storage. This expansion was conducted so as to allow for onsite storage of roll-offs when exceedances of Permit Specific Condition #15 occur and allow for Permit Specific Conditions #18 to be satisfied prior to transportation off-site for proper disposal.

A review of the information revealed that the facility promptly disclosed the permit exceedance when it was discovered to the Department and corrective actions had already been implemented to prevent future occurrences. The facility has met all its obligations in responding to the violation once it was discovered in a timely manner and instituting procedures to correct and ensure that the violation does not occur again.

CONCLUSION:

The facility appears to be in compliance at the conclusion of this file review.

A. Outside North Storage Area (ONSA):

Area not reviewed.

B. Hazardous Waste Storage :

Area not reviewed.

C. Loading Dock, Processed Powder Storage, Maintenance:

Area not reviewed.

D. Inbound Universal Waste Storage:

Area not reviewed.

E. Records:

Area not reviewed.

F. Fluorescent Lamp Processing :

Area not reviewed.

G. HID Processing:

Area not reviewed.

H. Retort :

Area not reviewed.

I. Battery Storage:

Area not reviewed.

K. Retort Prep Area:

Area not reviewed.

Inspection Date: 01/13/2012

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

Type: Violation

Rule: 403.727(1)(c)

Explanation: Permit Specific Condition #18 states "If the levels of mercury in Condition 15 of this Part are exceeded, the Permittee shall perform one or more of the following in order to comply with the levels specified in Condition 15 above:

- a. Resample the subject material;
- b. Reprocess the material in the crusher separator unit;
- c. Process the material in a mercury reclamation unit; or
- d. Deliver the material to another mercury recovery facility for processing."

Due to the roll-off being sent off-site for disposal, Permit Specific Condition #18 could not be met.

Corrective Action: The facility has increased its storage capacity to four roll-offs. The expansion of the concrete pad has allowed for the additional storage time to ensure the facility complies with Permit Specific Condition #18.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
403.727(1)(c)		01/13/2012	Permit Specific Condition #18 states "If the levels of mercury in Condition 15 of this Part are exceeded, the Permittee shall perform one or more of the following in order to comply with the levels specified in Condition 15 above:
			a. Resample the subject material;
			b. Reprocess the material in the crusher separator unit;
			c. Process the material in a mercury reclamation unit; or
			d. Deliver the material to another mercury recovery facility for processing."
			Due to the roll-off being sent off-site for disposal, Permit Specific Condition #18 could not be met.

Areas of Concern

No Areas of Concern

Inspection Date: 01/13/2012

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Aaron Mitchell

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

1/25/2012

DATE

Linda Dunwoody

REPRESENTATIVE NAME

Operations Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

Veolia ES Technical Solutions

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.