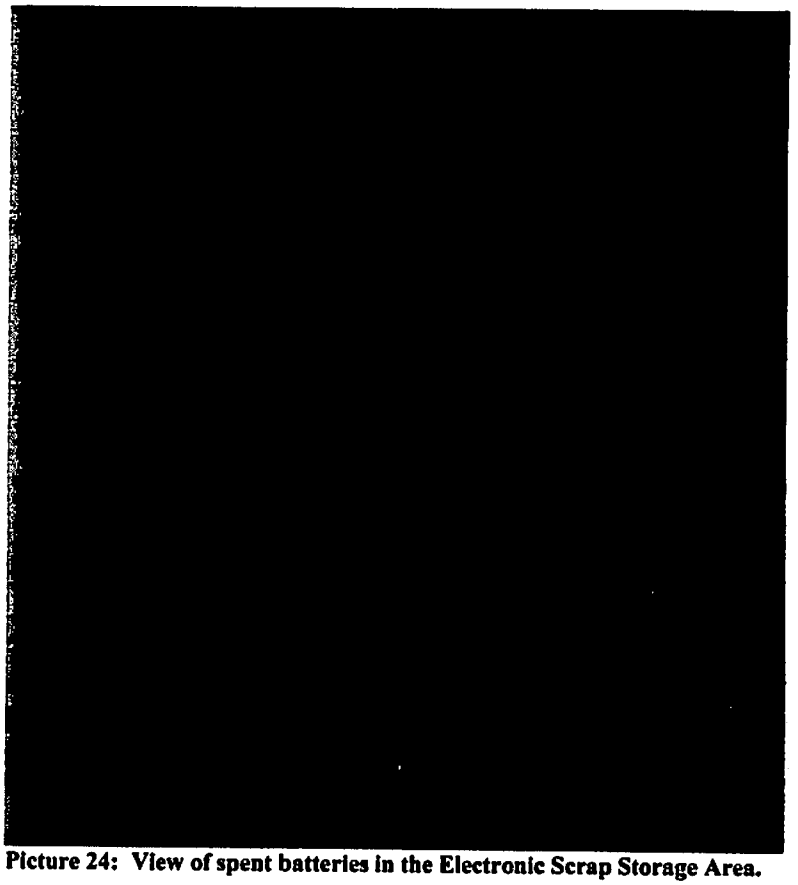
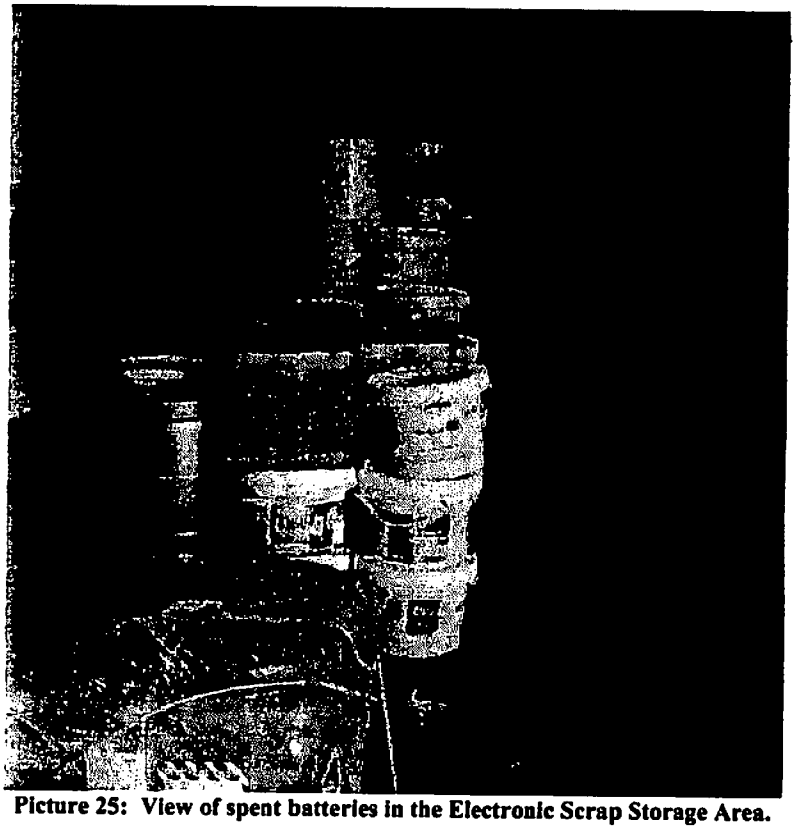
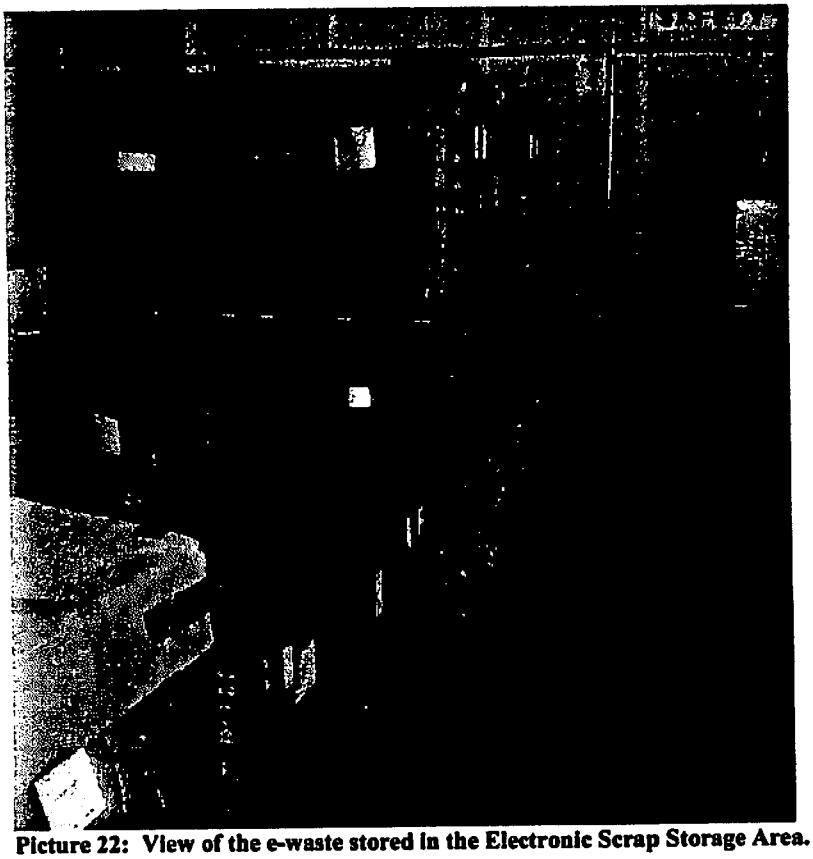


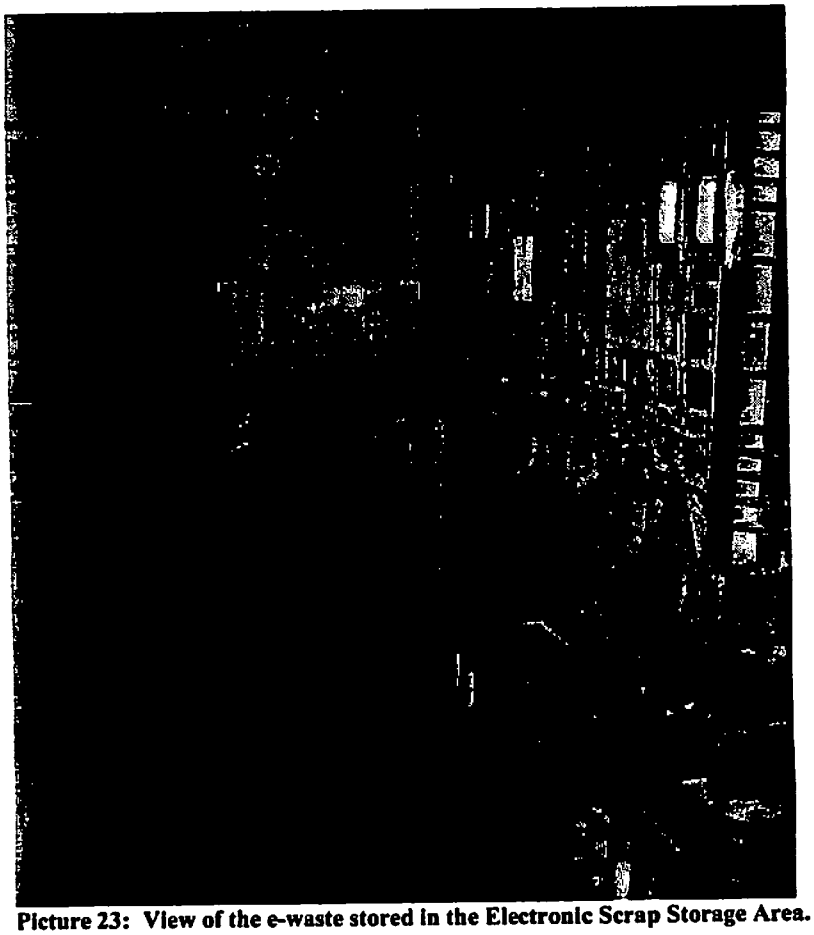
Picture 24: View of spent batteries in the Electronic Scrap Storage Area.



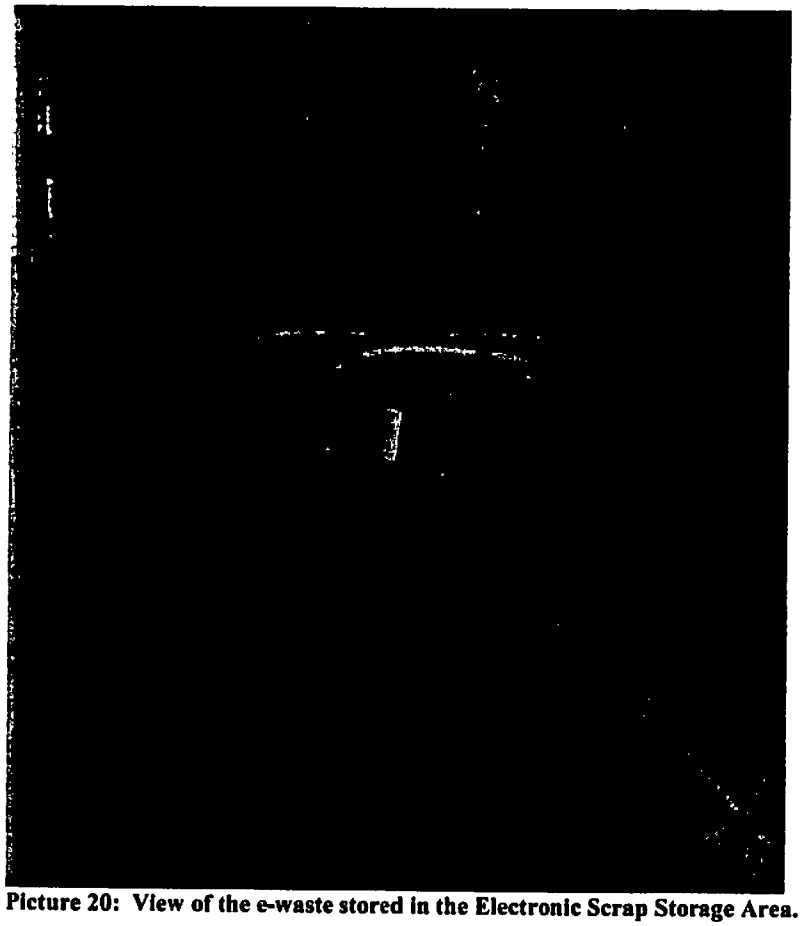
Picture 25: View of spent batteries in the Electronic Scrap Storage Area.



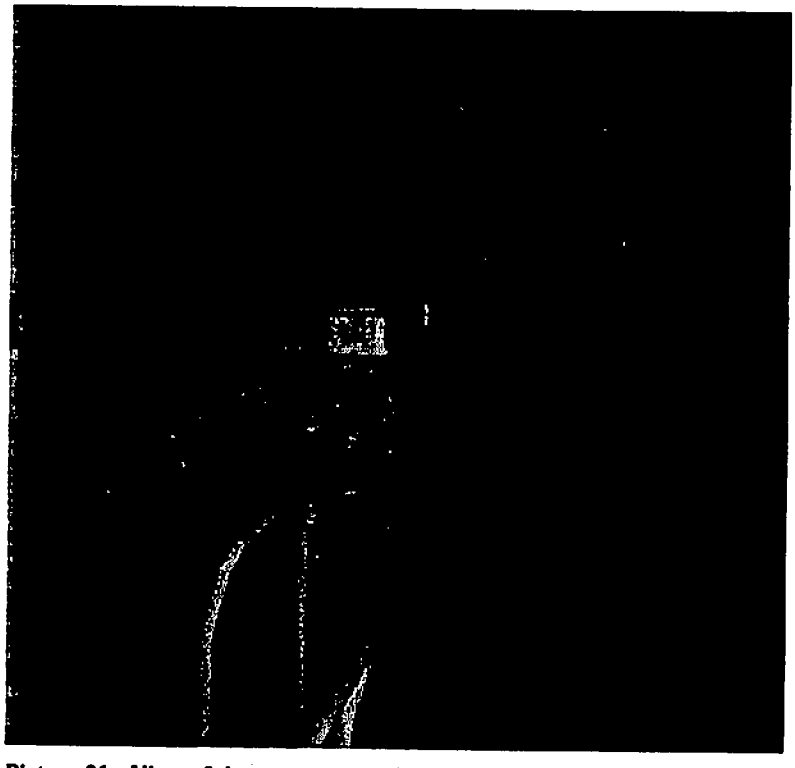
Picture 22: View of the e-waste stored in the Electronic Scrap Storage Area.



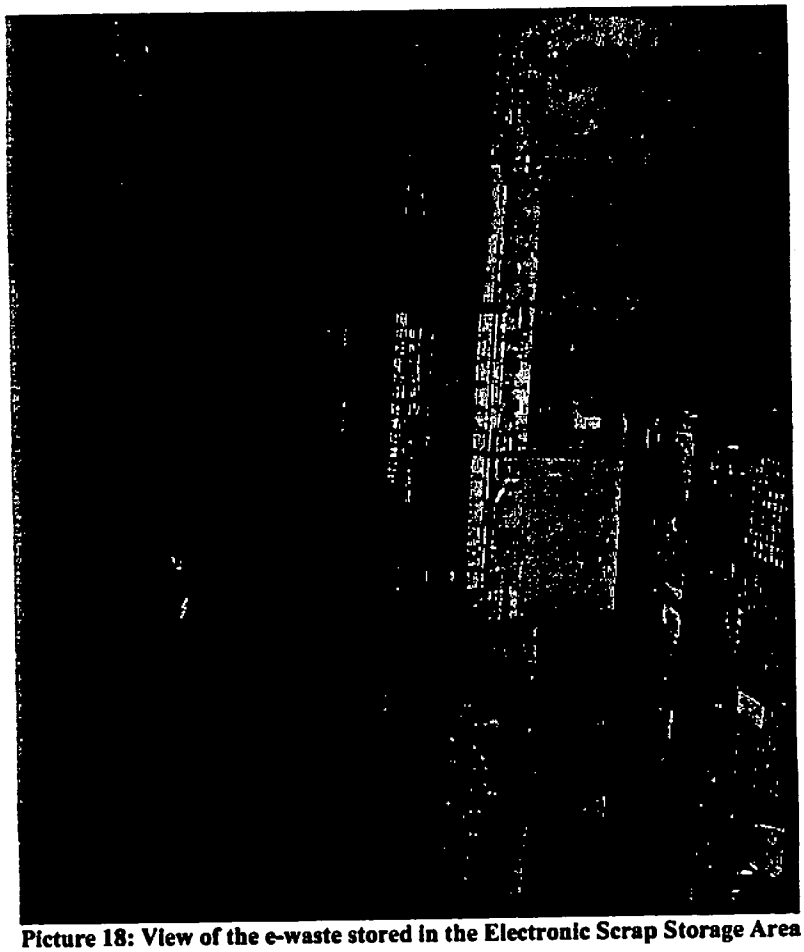
Picture 23: View of the e-waste stored in the Electronic Scrap Storage Area.



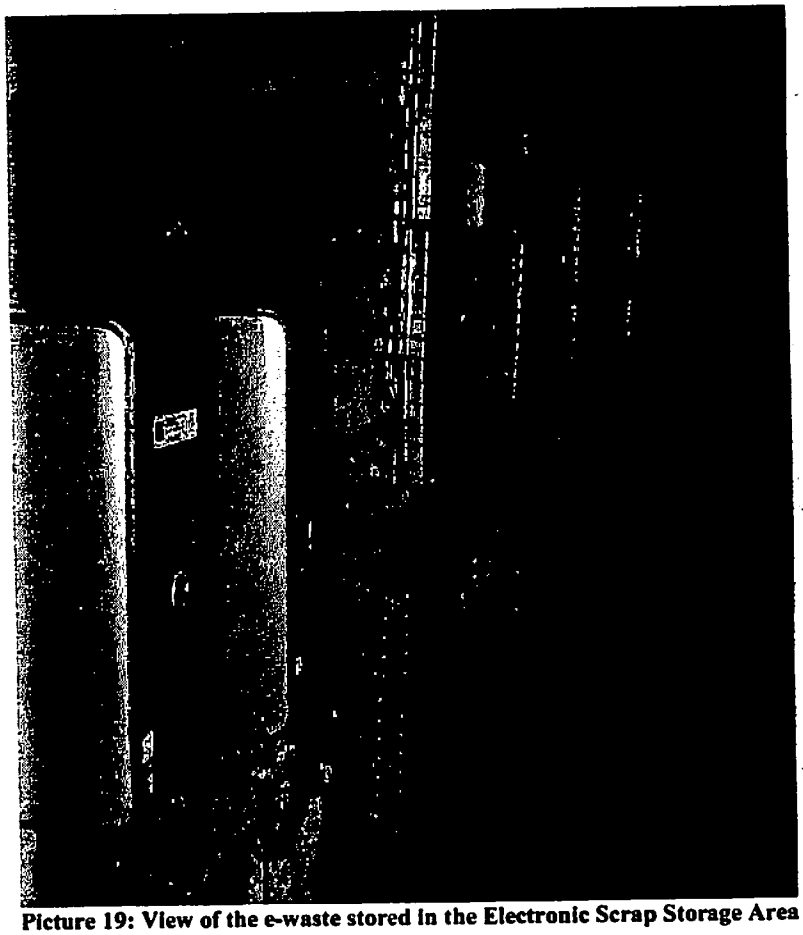
Picture 20: View of the e-waste stored in the Electronic Scrap Storage Area.



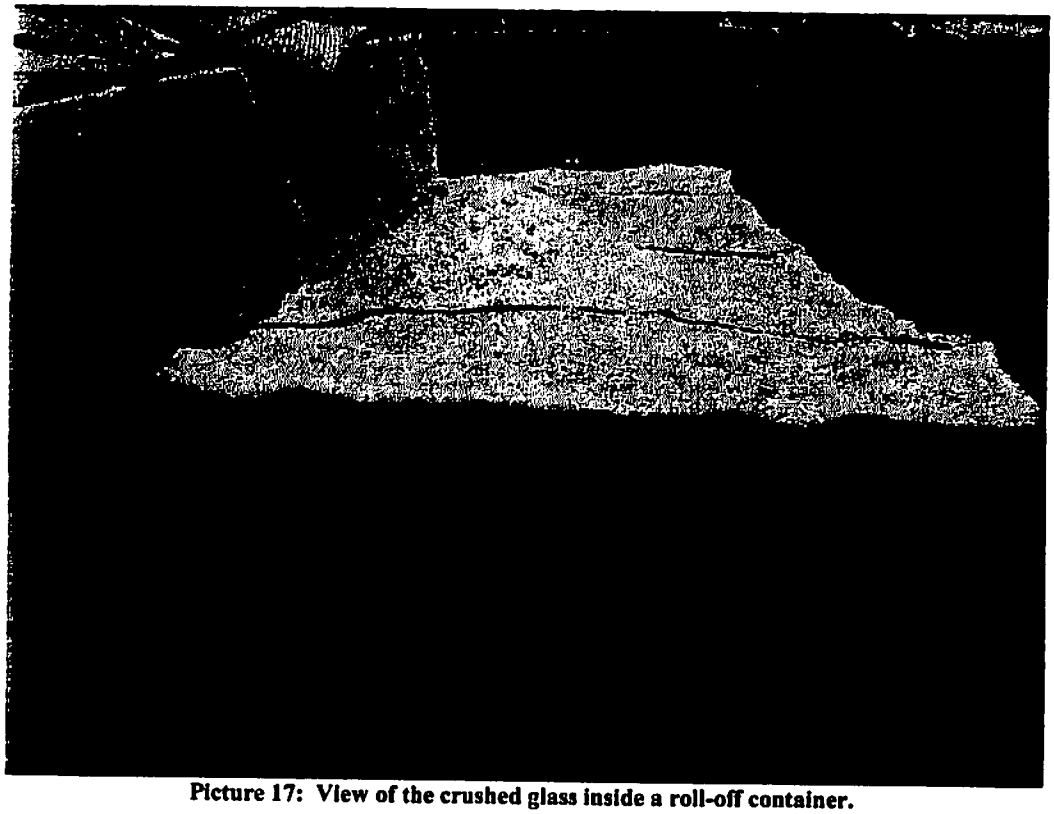
Picture 21: View of the e-waste stored in the Electronic Scrap Storage Area.



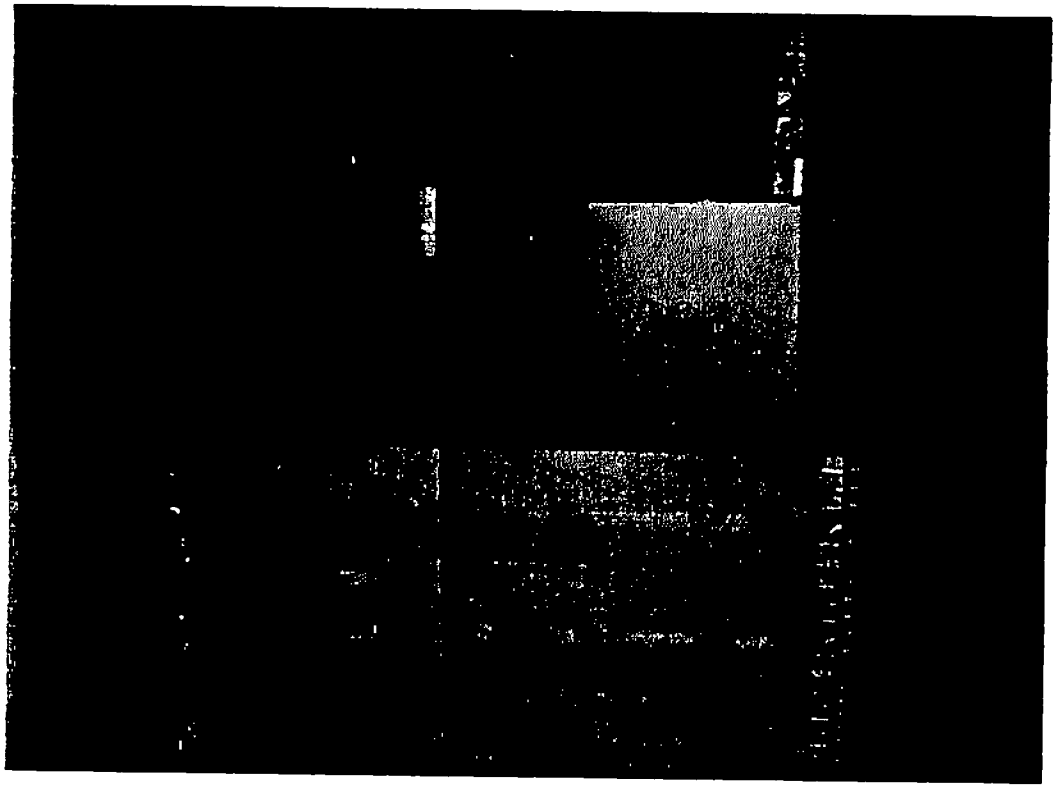
Picture 18: View of the e-waste stored in the Electronic Scrap Storage Area



Picture 19: View of the e-waste stored in the Electronic Scrap Storage Area

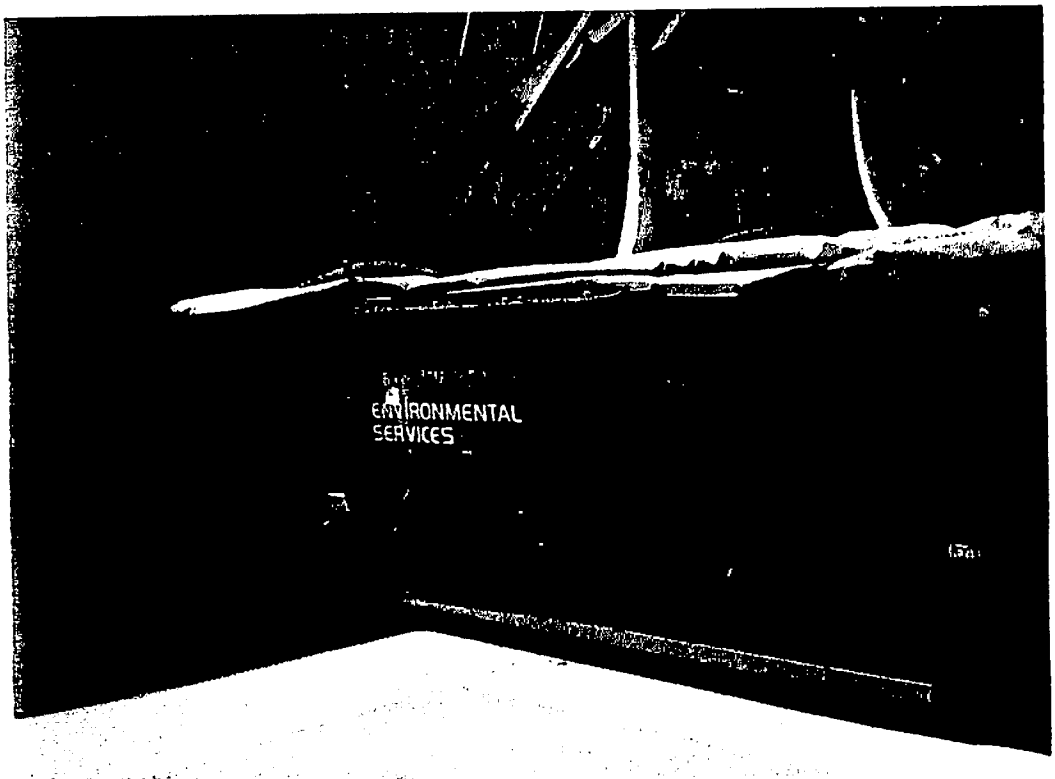


Picture 17: View of the crushed glass inside a roll-off container.

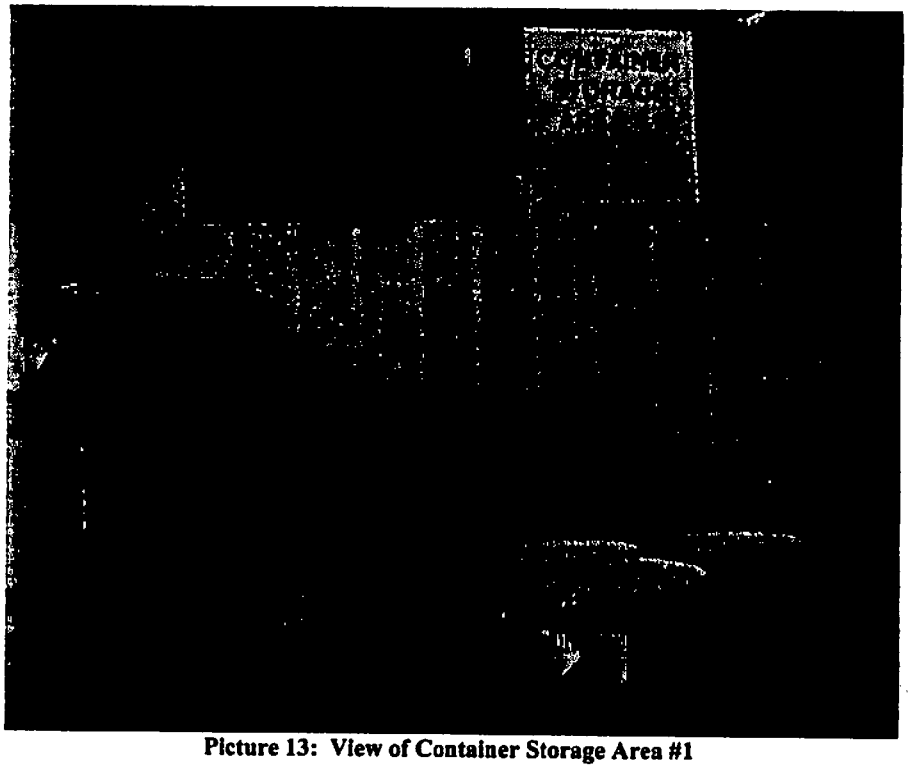




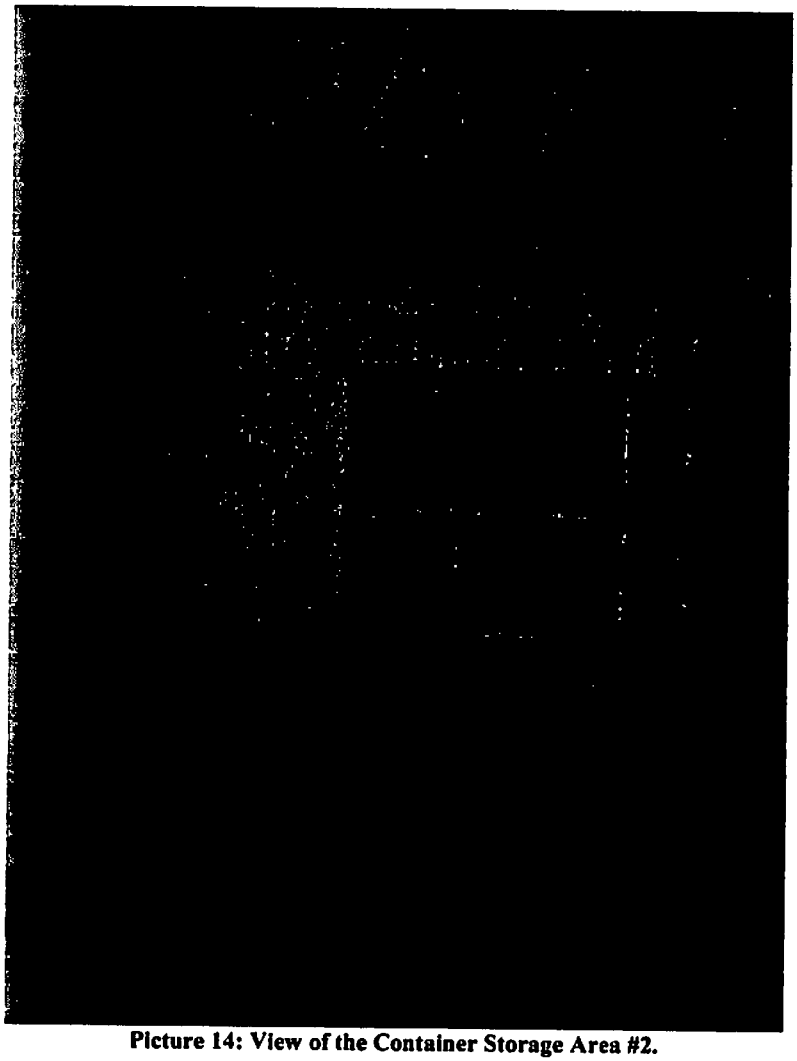
Picture 15: View of the roll-off containers used to accumulate crushed glass.



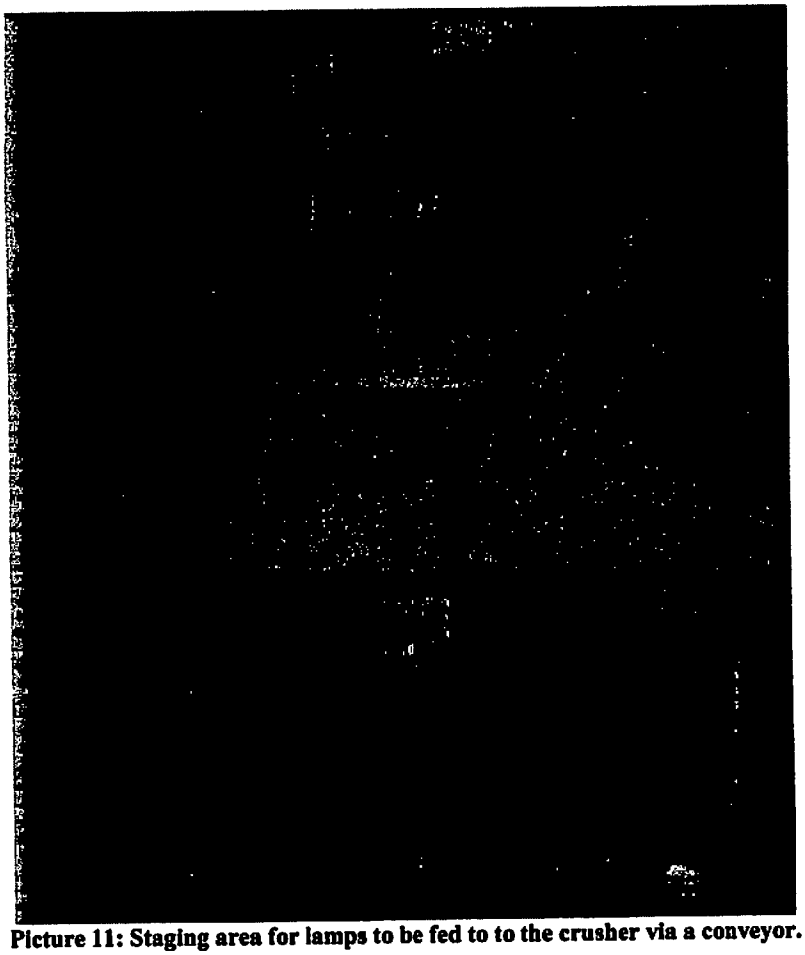
Picture 16: Side view of a roll-off container used to accumulate crushed glass.



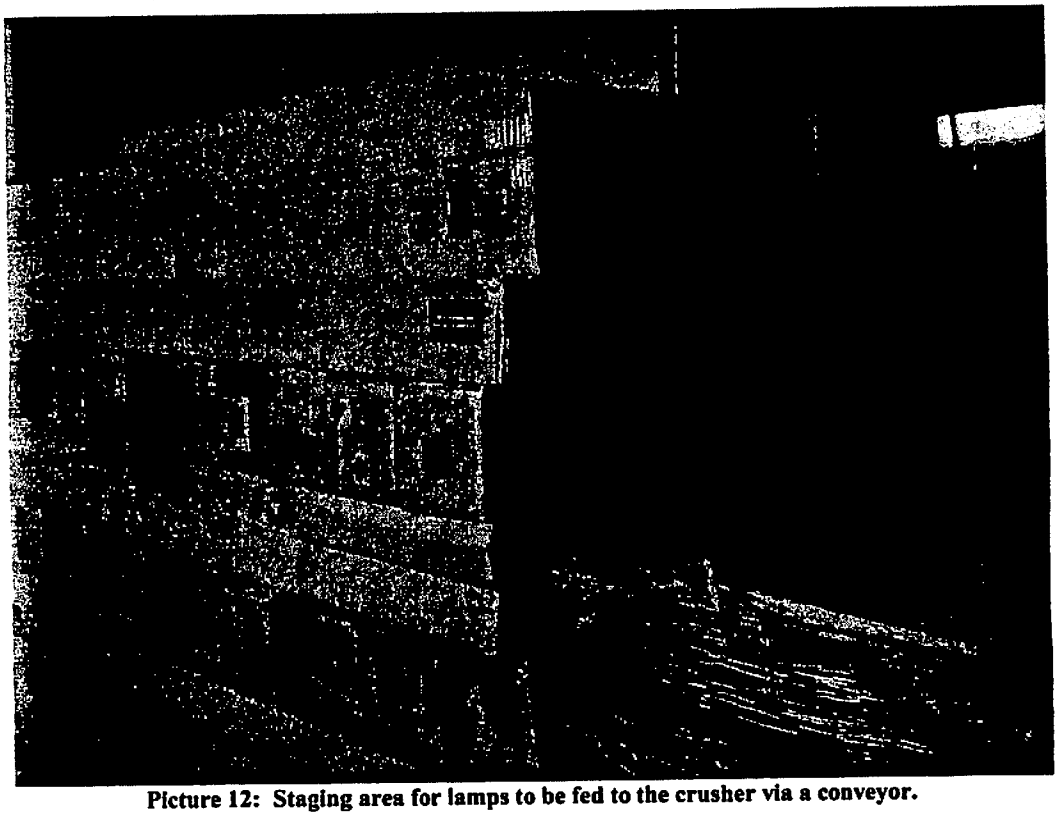
Picture 13: View of Container Storage Area #1



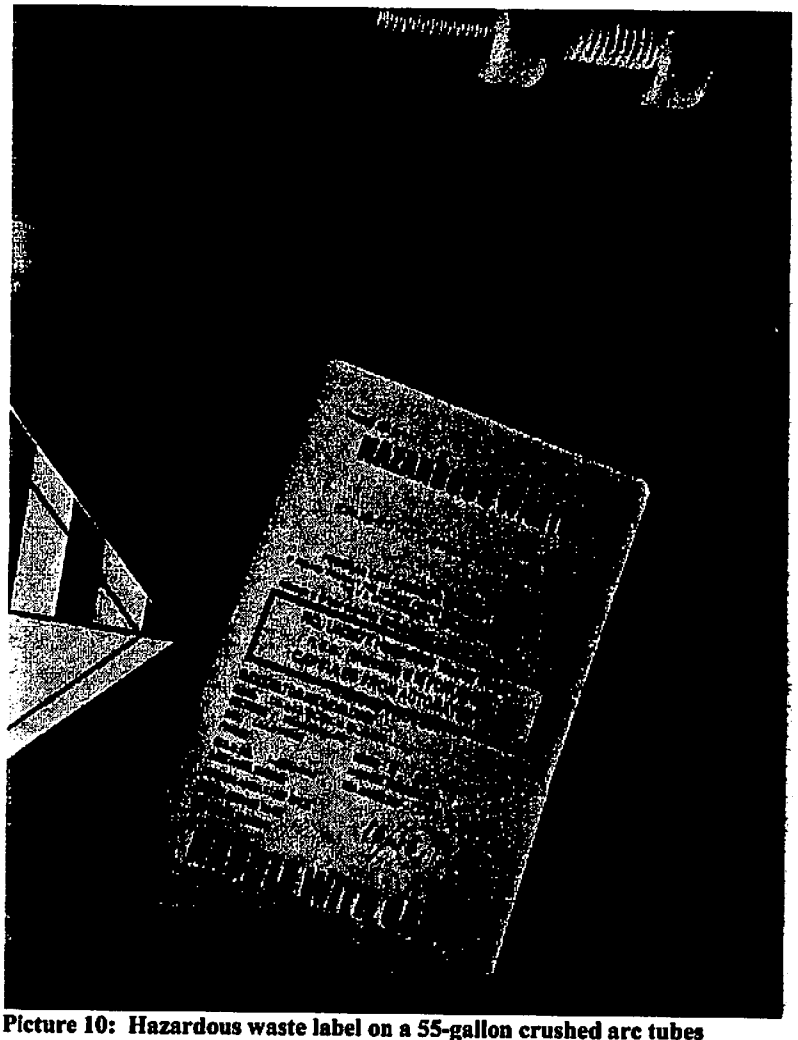
Picture 14: View of the Container Storage Area #2.



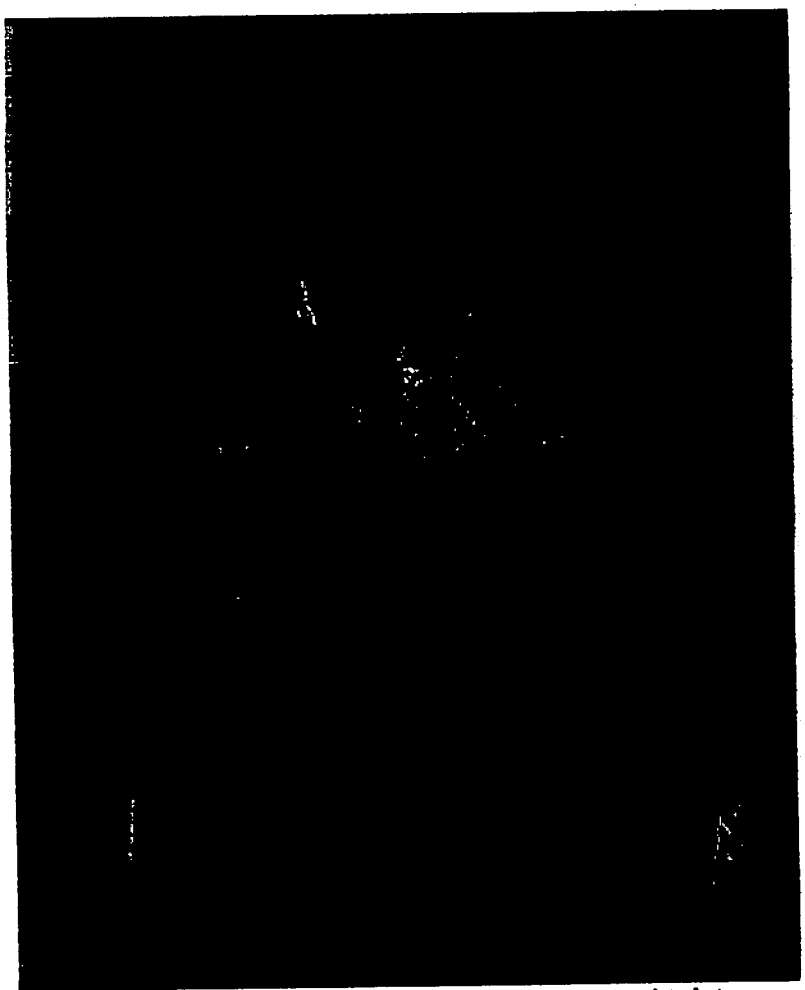
Picture 11: Staging area for lamps to be fed to to the crusher via a conveyor.



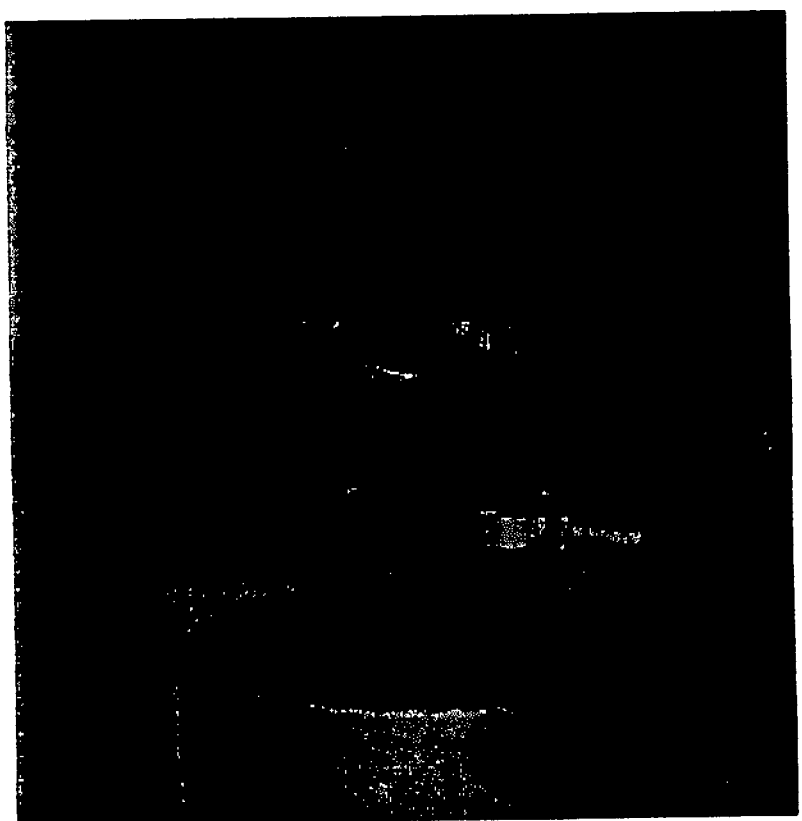
Picture 12: Staging area for lamps to be fed to the crusher via a conveyor.



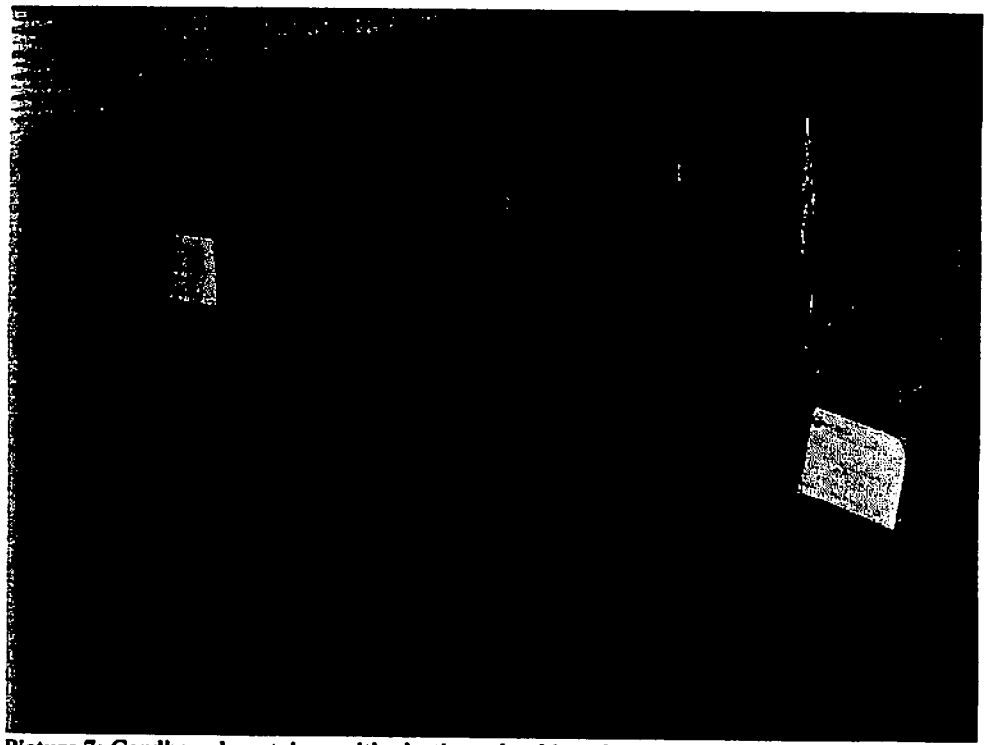
Picture 10: Hazardous waste label on a 55-gallon crushed arc tubes reclaimed from HIDs.



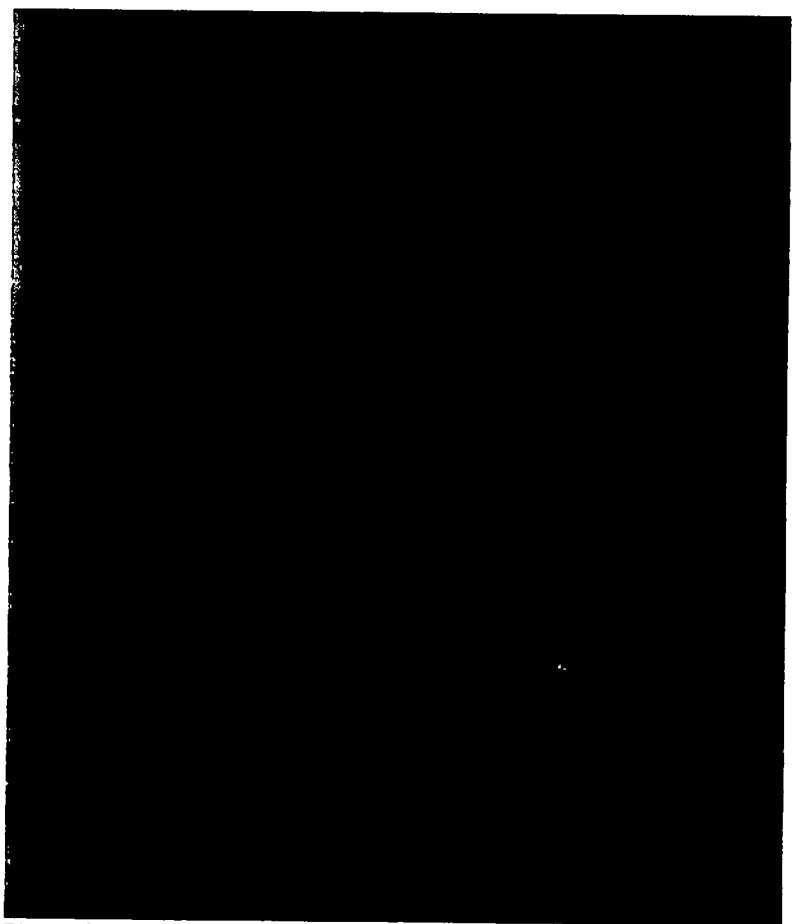
Picture 9: View of the universal waste containers in the permitted storage area.



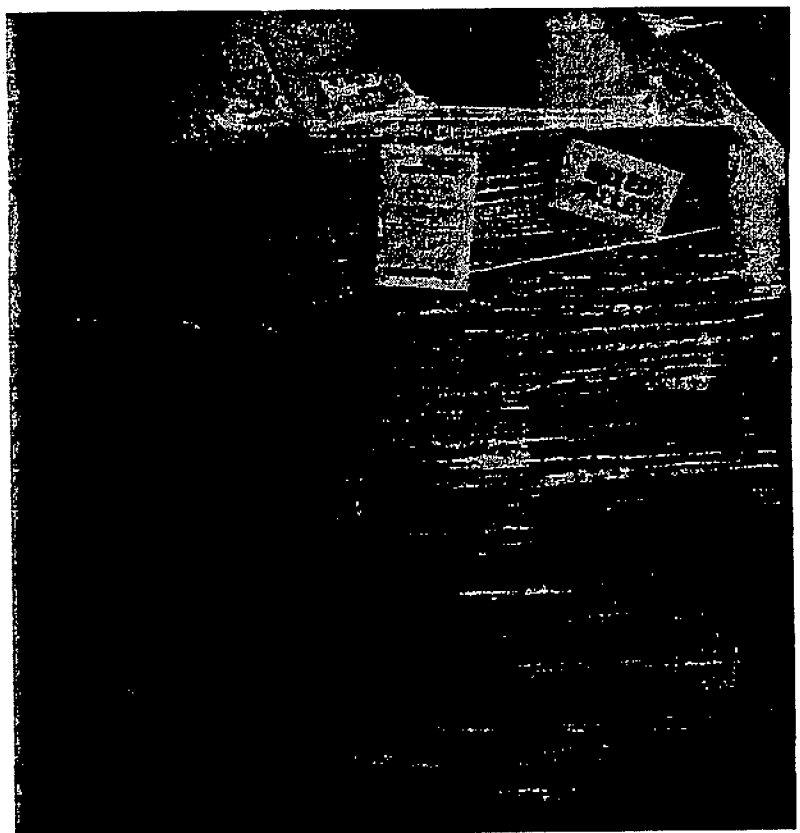
Picture 10: View of the universal waste containers in the permitted storage area.



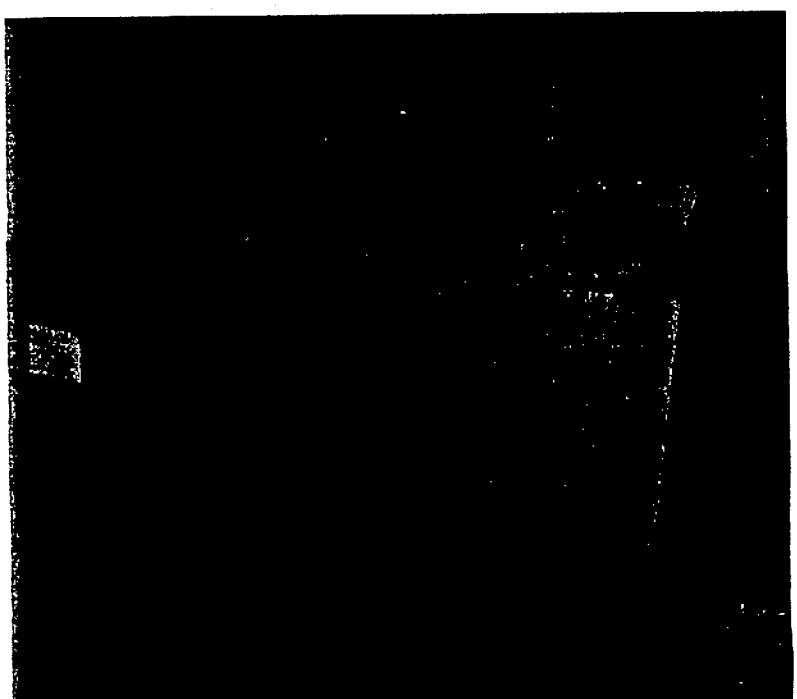
Picture 7: Cardboard container with plastics to be shipped to a recycler.



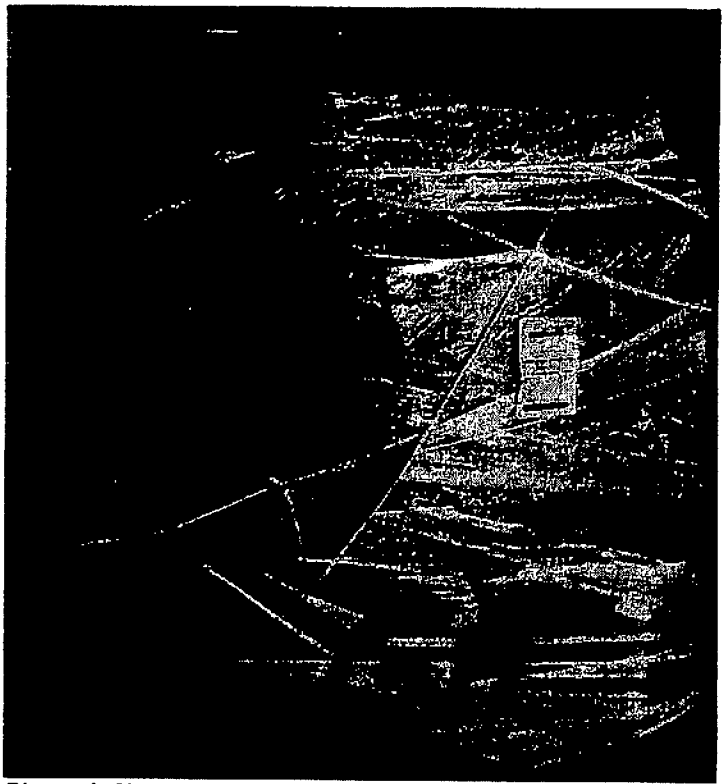
Picture 8: View of the universal waste containers in the permitted storage area.



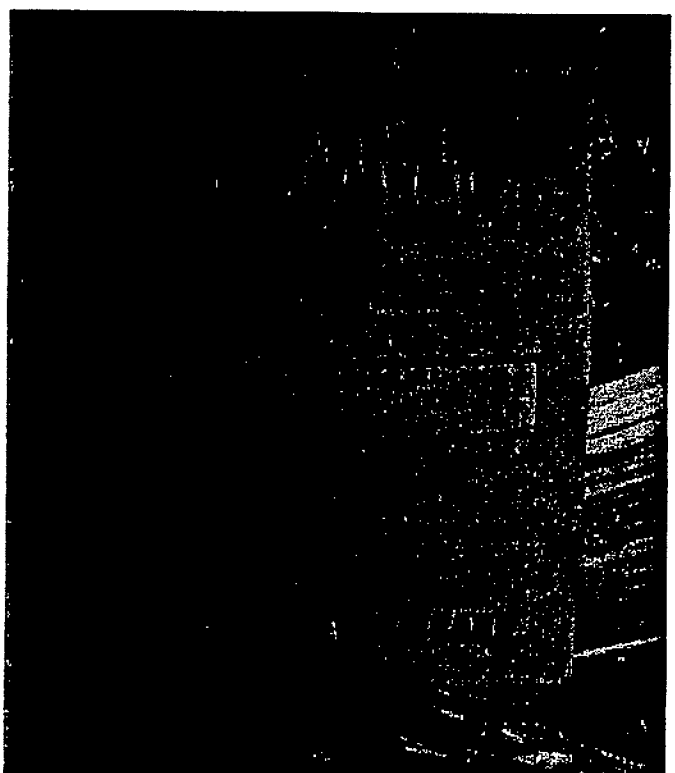
Picture 5: Universal waste lamps boxes in trailer parked at the transfer yard.



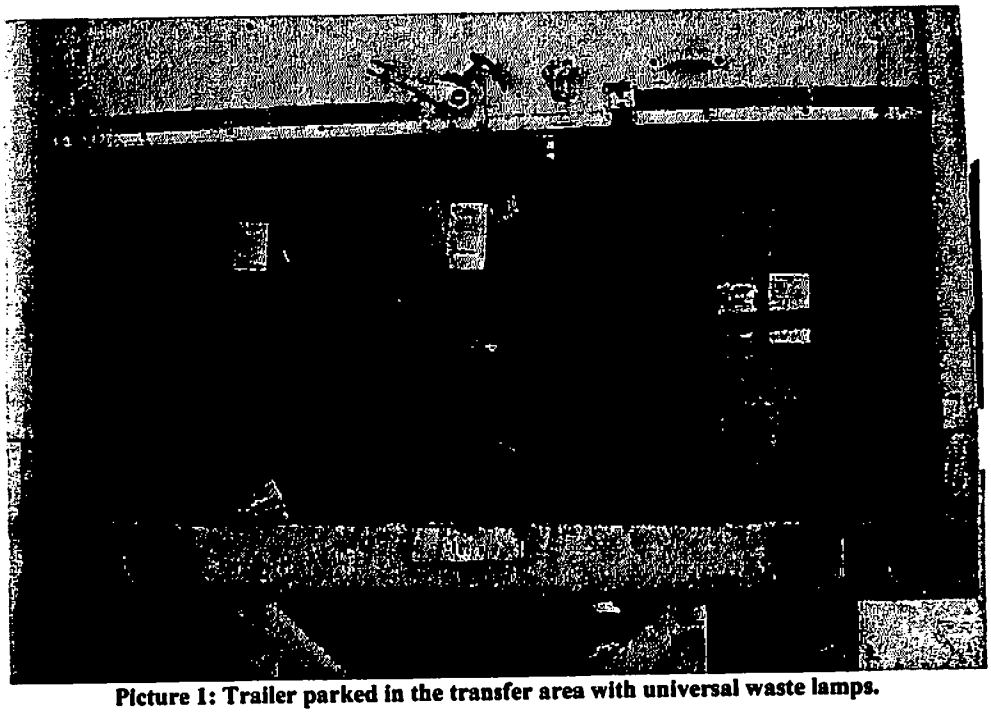
Picture 6: Cardboard container with plastics to be shipped to a recycler.



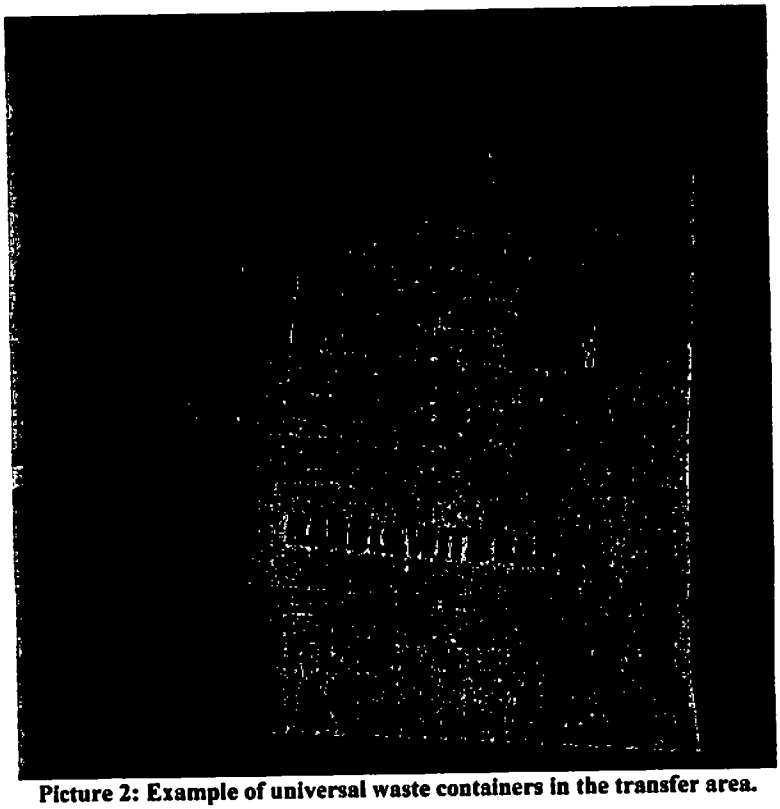
Picture 3: Universal waste lamps in a trailer parked at Veolia's transfer station



Picture 4: Example of the label for universal waste lamps in a trailer parked at Veolia's transfer station.



Picture 1: Trailer parked in the transfer area with universal waste lamps.



Picture 2: Example of universal waste containers in the transfer area.

Veolia ES Technical Solutions LLC
342 Marpan Lane
Tallahassee, Florida 32305-0904
EPA ID#: FL0 000 207 449

EPA RCRA Inspection Pictures

October 16, 2012

11) **Out-Briefing**

After the facility tour and a file review, the inspectors informed Ms. Dunwoody and Mr. Williams of the preliminary conclusions of the inspection.

12) **Author of Report**

Javier E. García
Environmental Engineer

11/13/12
Date

13) **Concurrence and Approval**

Larry L. Lamberth
Chief, South Enforcement and
Compliance Section

11/15/12
Date

segregated using air. The air from the crusher is vented through a baghouse dust collector that captures the phosphor powder. From the baghouse collector, the dust is accumulated in 55-gallon and transfer to the retort room. Across from the staging area, the inspectors observed 32 55-gallon containers with retort's residue to be sent to a Subtitle D landfill. No violations were observed in this area (Pictures 11 - 12).

Container Storage Areas:

These two container storage areas are designated in the permit as Storage Area #1 and Storage Area #2. They are located in the northern end of the building. According to the permit, Veolia can store a combined maximum of 27 pallets (108 55-gallon drums) of mercury containing hazardous wastes in the storage area. At the time of this inspection, Storage Area #1 had 12 55-gallon drums of crushed lamp capsules, five 55-gallon drum of phosphor powder, one 35-gallon drum of small capacitors, two 1-cubic yard boxes with conveyor belts (one full and one for accumulation), and one 1-cubic yard box with contaminated personal protection equipment (PPE). In Storage Area #2, Veolia had four containers of aluminum end caps and two 55-gallon drums for the accumulation of mop water. The oldest accumulation dated observed in the storage areas was August 9, 2012. No violations were observed at the time of this inspection (Pictures 13 - 14).

Crushed Glass Storage Pad

The crushed glass storage pad is outside the main building, adjacent to the Crush and Separation Room. Veolia accumulates the crushed glass in 20 cubic yard roll-off containers for disposal at a Subtitle D landfill. No violations were observed at the time of the inspection (Pictures 15 - 17).

South Building:

This is a warehouse type building, immediately to the south of the main building. Veolia leases a section of the building that is divided into two large rooms. One room is used for storage of empty containers and the other room is used for storage of e-wastes and batteries. The permit allows Veolia to store up to 72 pallets of e-waste and batteries in this area. At the time of the inspection, all pallets were properly labeled and protected from the environment. No violations were observed at the time of the inspections (Pictures 18 - 25).

Records Review:

During the inspection, the inspectors reviewed randomly selected shipment and manifest records (incoming and outgoing), inspection logs and training records for January 2011 to October 2012. The inspectors noted that the Hazardous Waste Storage Inspection Checklist approved with the permit did not have a space to note the number of containers in storage. The Agencies recommended Veolia include in the checklist the number of containers in storage at the time the weekly inspections are conducted. Besides the above-mentioned documents, the inspectors reviewed the analysis results for the scrap metals, conveyor belts and crushed glass. One sample of HIDs lamps' bases (Sample # NMF 0219--02; dated 05/31/2012) exhibited the characteristic of toxicity for lead. However, Veolia manages the HID bases as scrap metals and sends them to a metal reclamation facility.

Universal Waste Transfer Facility:

This is an open, unpaved area in the same industrial park where Veolia is located. The transfer station is about 1,000 feet from Veolia's production building. The transfer station is not contiguous or across from the Veolia's facility; hence, it has its own EPA identification number (EPA ID No.: FLR 000 124 917). Veolia uses the area as a transfer station for universal wastes. According to Mr. Williams, no manifested hazardous waste is managed in this area. At the time of the inspection, Veolia had 12 trailers parked in the area. Four trailers were empty, one had supplies and seven had different type of electronic waste and universal waste lamps. No violations were observed at the time of the inspection (Pictures 1 - 5).

Loading/Unloading Dock

This area has two trailer docking stations for materials loading and unloading. The stations are separated by a lower concrete pad used for unloading shorter cargo vehicles. At the time of the inspection, Veolia had three cardboard boxes with plastic materials to be shipped to a recycler (Pictures 6 - 7).

Universal Waste Storage Area

This area is to the south of the loading/unloading docks. The area is used for temporary storage of universal waste lamps that require manual processing prior to recycling/reclamation. According to its permit, Veolia can store up to 7,424 cubic feet of mixed fluorescent and HID lamps. At the time of the inspection, the containers were stored in rows (identified 1 - 13) labeled and closed. No violations were observed at the time of the inspection (Pictures 8 - 10).

HID Processing Area:

In this area, Veolia processes the HID lamps to reclaim the arc tubes. The HID lamps are disassembled manually or in an automated system. The automated system operates under negative pressure and it is vented through an activated carbon filtration system. The automated system uses air to separate outer glass, metal bases and support wires from the arc tubes. Once separated from the other components, the arc tubes are crushed and accumulated in a 55-gallon container for further processing in the retort room. The remaining lamp components are accumulated in containers and sent off-site for recycling or disposal. At the time of the inspection, Veolia had one 55-gallon container with arc tubes. The container was closed, dated and appeared to be in good condition (Picture 10).

Non Hazardous Waste Storage Area:

This area is adjacent to the lockers room. At the time of the inspection, Veolia had three 55-gallon containers with lamp ballasts. No violations were observed in this area.

Fluorescent Lamp Processing Staging Area:

This area is next to the conveyor that feeds lamps to the Crush and Separation Room. Fluorescent lamps are hand fed into the lamp processing room via a belt conveyor. In the room, the lamps are crushed and the components (glass, aluminum and phosphor powder) are

8) **Previous Inspection History**

On June 11, 2012, FDEP inspected Veolia and found no violations.

9) **Facility Description**

Veolia is at 342 Marpan Lane, Tallahassee, Florida, in the southern section of Tallahassee. The facility covers approximately 3.4 acres and is in an industrial park. HM Williams Properties is the owner of the property. The facility started operations in 1996 under the ownership of Recyclights. Since then, the facility has been operated by Superior Support Services, Inc., Onyx Special Services, Inc., and Onyx Environmental Services LLC. Veolia has 24 employees and receives wastes one shift a day, five days a week. The facility is connected to the city drinking water supply and sewer lines.

At the facility, Veolia receives mercury containing universal wastes for mercury reclamation at its retort unit. In addition, the facility serves as transfer station for electronic wastes and universal waste batteries. Veolia is authorized to store mercury wastes pursuant to the RCRA Permit Number 71455-HO-011, issued by FDEP in June 2006, and renewed in December 2011. The permit allows Veolia to store 6,400 cubic feet of mixed sizes fluorescent lamps, 24,000 high intensity discharge (HID) lamps and sixty 55-gallon drums of mercury containing devices/unprocessed powder. The facility manages waste from NC, SC, GA, FL, TN, LA, MS, AR and AL.

Upon receipt, the lamps are either transferred to the designated storage areas or fed to the processing line. Some of the lamps can be fed to the crusher as received while the HID lamps may require manual removal of the arc tubes. In the automated system, the lamps are fed to a crusher that is operated under negative pressure. The dust from the crusher (mercury bearing phosphor powder) is accumulated in a baghouse air pollution control system and fed to the retort unit. In the manual process, HID lamps are dissembled and the arc tubes, end caps and the outer glass are sorted. The arc tubes are crushed, placed in drums and transferred to the retort unit for mercury reclamation. The elemental mercury that is recovered in the retort is shipped to a mercury refiner/seller.

In addition to universal waste lamps, Veolia recovers mercury from mercury containing articles (MCMAs). The MCMAs (i.e., thermometers, thermostats, etc) are recycled through a combination of manual separation followed by retort processing or the articles may be placed directly into the retort oven.

Veolia ships the metal components removed from the lamps to metal reclamation facilities and the crushed glass either to a solid waste landfill or to a glass recycling facility. In addition to baghouse filters, Veolia uses activated carbon to control the facility's air emission. When replaced, the mercury contaminated filters are shipped off-site as hazardous waste (D009).

10) **Inspection Findings**

After introductions and presentation of the credentials, the inspector explained the purpose of the inspection. Following a brief description of Veolia's operation, the inspection team proceeded to tour the facility. The following are the observations made during the inspection.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RCRA COMPLIANCE INSPECTION REPORT

1) **Inspector and Author of Report**

Javier E. García, Environmental Engineer

2) **Facility Information**

Veolia ES Technical Solutions LLC
342 Marpan Lane
Tallahassee, Florida 32305-0904

Contact Phone: (850) 877-8299

EPA ID#: FL0 000 207 449

SIC CODE: 3341 Secondary Smelting and Refining of Nonferrous Metals

3) **Responsible Official**

Linda Dunwoody, Operations Manager

4) **Inspection Participants**

Linda Dunwoody, Veolia ES Technical Solutions
Randy Williams, Veolia ES Technical Solutions
Aaron Mitchell, FDEP – Northwest District
Javier García, USEPA Region 4

5) **Date and Time of Inspection**

October 16, 2012
9:30 a.m.

6) **Applicable Regulations**

RCRA Sections 3005 and 3007, (42 US Code – Annotated U.S.C.A. 6925 and 6927);
40 Code of Federal Regulations (C.F.R.) Parts 260-266, 270, 273, 279;
Florida Statutes § 403.702 et seq. and regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapter 62-730; and, FDEP RCRA Permit Number: No 71455-HO-011 for storage and reclamation of mercury waste. The permit expires on September 26, 2016.

7) **Purpose of Inspection**

To conduct a Compliance Evaluation Inspection (CEI) of Veolia ES Technical Solutions LLC (Veolia) to evaluate the facility's compliance status with applicable RCRA regulations and its RCRA permit.

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

NOV 15 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Dunwoody
Operations Manager
Veolia Environmental Services Technical Solutions LLC
342 Marpan Lane
Tallahassee, Florida 32305-0904

SUBJ: RCRA Compliance Evaluation Inspection
Veolia ES Technical Solutions LLC
EPA ID No.: FL0 000 207 449

Dear Ms. Dunwoody:

On October 16, 2012, the United States Environmental Protection Agency conducted a Compliance Evaluation Inspection (CEI) at Veolia ES Technical Solutions, LLC in Tallahassee, Florida. The purpose of the CEI was to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA) regulations and its RCRA permit. Enclosed is the EPA RCRA CEI Report, which describes the observations made during the inspection.

If you have any questions regarding this matter, please contact Javier García, of my staff, by phone at (404) 562-8616 or by email at garcia.javier@epa.gov.

Sincerely,

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

Enclosure

cc: James Byer, FDEP

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

NOV 15 2012

Mr. James Byer
Program Manager
Florida Department of Environmental Protection
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

SUBJ: RCRA Compliance Evaluation Inspection
Veolia ES Technical Solutions, LLC
EPA ID No.: FL0 000 207 449

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Sincerely,

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

Enclosure

cc: Aaron Mitchell, FDEP

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