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

DEP
NORTHEAST DISTRICT
RECEIVED
2012 DEC 21 AM 11:52

DEC 17 2012

Tim Bahr, Administrator
Hazardous Waste Program
Florida Department of Environmental Protection
2600 Blair Stone Road
MS #4500
Tallahassee, Florida 32399

SUBJ: RCRA Compliance Evaluation Inspection
Perma-Fix of Florida, Inc.
Facility ID: FLD 980 711 071

Dear Mr. Bahr:

On November 15, 2011, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted by the EPA and the Florida Department of Environmental Protection at the Perma-Fix of Florida, located in Gainesville, Florida.

Enclosed is the EPA RCRA Site Inspection Report which indicates that no violations of RCRA were discovered at this time. The EPA reserves the right to further review the information obtained at this inspection and request additional information as it pertains to this inspection.

If you have any questions regarding the inspection, please contact Tony Jenkins, of my staff, by phone at (404) 562-8603 or by email at jenkins.anthony@epa.gov.

Sincerely,

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

Enclosure

cc: Jabe Breland, FDEP – Jacksonville Office, w/encl.



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kurt Fogleman
Environmental Health & Safety Manager
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653

SUBJ: RCRA Compliance Evaluation Inspection
Perma-Fix of Florida, Inc.
EPA ID No.: FLD 980 711 071

Dear Mr. Fogleman:

Enclosed is a copy the U.S. Environmental Protection Agency inspection report documenting the results of the November 15, 2011, inspection of the Perma-Fix of Florida facility. This was a Compliance Evaluation Inspection for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act regulations (RCRA).

Enclosed is a copy of the EPA's inspection report indicating that no violations of RCRA were discovered. A copy of this report has also been forwarded to Florida Department of Environmental Protection.

If you have any questions regarding this matter, please contact Mr. Tony Jenkins, of my staff, at (404) 562-8603 or by email at jenkins.anthony@epa.gov.

Sincerely,

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

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

Enclosure

cc: Jabe Breland, FDEP – Jacksonville Office, w/encl.

RCRA Inspection Report

1) Inspector and Author of Report

Tony D. Jenkins, Environmental Engineer
North Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street
Atlanta, Georgia 30303
Phone: (404) 562-8603 FAX: (404) 562-8566

2) Facility Information

Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653
EPA ID No.: FLD 980 711 071

3) Responsible Officials

Mr. Kurt Fogleman, Environmental Health & Safety Manager

4) Inspection Participants

Mr. Kurt Fogleman, Perma-Fix, Environmental Health & Safety Manager
Mr. Randy Self, Perma-Fix, Nuclear Manager
Jabe Breland, Florida Department of Environmental Protection
Tony Jenkins, Environmental Protection Agency

5) Date and Time of Inspection

November 15, 2011 at 9:00 am

6) Applicable Regulations

40 Code of Federal Regulation (C.F.R.), Parts 260-270, 273, & 279 Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007, (42 US Code - Annotated U.S.C.A. 6925 and 6927), the Florida Resource Recovery and Management Act, Chapter 403 and the Florida Administrative Code (F.A.C.): 62-710, 62-730, and 62-737. Florida Department of Environmental Protection Permit/Certification Number: 17680-010-HC

7) Purpose of Inspection

The purpose of the inspection at Perma-Fix (hereinafter, "PF" or the "facility") was to conduct an unannounced Compliance Evaluation Inspection (CEI) and determine compliance under the Resource Conservation and Recovery Act (RCRA) regulations and statutes.

On November 15, 2011, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Florida Department of Environmental Protection (FDEP) conducted an inspection at PF to determine its compliance status with the RCRA and the State of Florida regulations. This was an EPA-lead inspection. Upon entering the facility inspectors were greeted by Environmental Health & Safety (EH&S) staff. The EPA and FDEP were escorted to a conference room for an entrance briefing. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

8) Facility Description

Perma-Fix is a large quantity generator (LQG) and a permitted hazardous waste storage facility. The facility's processes include liquid and sludge bulking, scintillation vial 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 a Hazardous Waste Treatment, Storage, and Disposal Permit(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 was last inspected on June 23, 2011 by FDEP.

The facility is situated on 7.6 acres of land and employs approximately 43. Hours of operation for this facility are Monday through Friday 8 a.m. to 5 p.m. This facility began operations in 1983 and introduced radioactive RCRA mixed hazardous waste to the process in 1999. Facility personnel stated that the main generator of their mixed waste is the United States Navy followed closely by the Department of Energy Paducah Kentucky and Savannah River facilities.

Facilities In- brief Notes

The facility officials listed above stated that they treat hazardous waste contaminated with radiation in the range of 10 to 99 nanocuries (nCi) at this site and that this material is sent to the Nevada Test Site (NTS) for disposal. The facility officials also stated that on occasion nonconforming material may come to the facility and is sent back to the generator. The facility has a thermal distortion unit but claimed this unit has not been in use for approximately three years. When operating the unit can process up to 3,000 pounds of mixed waste in 24 hours and has a maximum operating temperature of 275°F. The facility officials stated that this unit will be used again but eventually would be sent to its sister facility, Materials and Energy Corporation (M & EC) located in Oak Ridge, Tennessee.

9) **Findings**

The following areas were inspected and deficiencies noted:

Processing and Storage Building (PSB)

The Processing and Storage Building is a permitted hazardous waste container and tank storage area as well as a fuel-blending location that includes phase separation treatment. The facility is allowed to store a maximum of 72,105 gallons of waste in containers and in sizes up to 718 gallons (B-25 box) or less in this PSB storage area. The hazardous waste containers stored in this area 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 from the fuel blending process. This area appeared to me all the stored conditions of the permit.

A 3,000-gallon aboveground storage tank (AST) is located in the approximate center of the permitted container storage area. The tank has appropriate secondary containment and a sump to contain any spillage. At the time of this inspection, the AST was empty.

LSV Processing and Waste Storage Building

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. The facility may store a maximum of 54,340 gallons in containers in sizes up to 718 gallons (B-25 box) or less, in the LSV Processing and Waste Storage Warehouse.

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. (See Photo 1)

Liquid Scintillation Fluid (LSF) Processing Area

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 contains small amounts of xylene and toluene and may be radioactive. The LSF is therefore regulated under the RCRA as F003/F005 hazardous waste, and if radioactive, as a Mixed Waste under RCRA. At the time of inspection, the unit was in operation, and no violations were observed.

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.

Treatment and Operations Building (TOB)

This permitted storage area has seven different zones of secondary containment inside the Treatment and Operations Building (TOB). A maximum volume of 35,200 gallons of hazardous waste can be stored in the TOB as stipulated in the facility's permit. All the containers inspected were properly labeled, dated, closed and in the correct zone.

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 is managed as hazardous waste and is transferred to the LSF processing area for liquid recovery. The laboratory less than 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 two 55-gallon drums (acid waste, flammable liquid waste, and waste vial solids) that were properly labeled, dated, and closed.

11) Record Review

Manifests

Manifests were reviewed for the shipment of hazardous waste in 2011. The manifests appeared satisfactory.

Contingency Plan

Inspectors reviewed the Contingency Plan. The plan appeared to be satisfactory.

The inspectors also reviewed other LQG/TSD records (emergency procedures, personnel training, biennial report, and weekly inspections of the 90 day or less, waste analysis plan) that appeared to be satisfactory.

Annual inspection logs (fire sprinkler system check, facility inspection by emergency response officials, housekeeping, percent storage capacity available, secondary containment integrity, and emergency response equipment) were reviewed for the RCRA permitted storages. Daily, weekly, and monthly inspection logs were also reviewed for same above-mentioned areas and they appeared satisfactory.

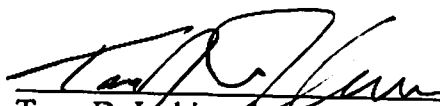
Land Disposal Restriction Notice

The land disposal restriction documents appeared satisfactory.

12) Out-Briefing

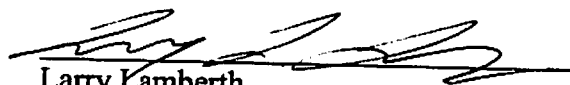
Upon conclusion of the inspection, an exit interview was conducted in the above mentioned PF staff. The inspectors informed the facility personnel of the findings at the time of this inspection.

13) **Signed**


Tony D. Jenkins
Nuclear Engineer
North Enforcement and Compliance Section

12/13/12
Date

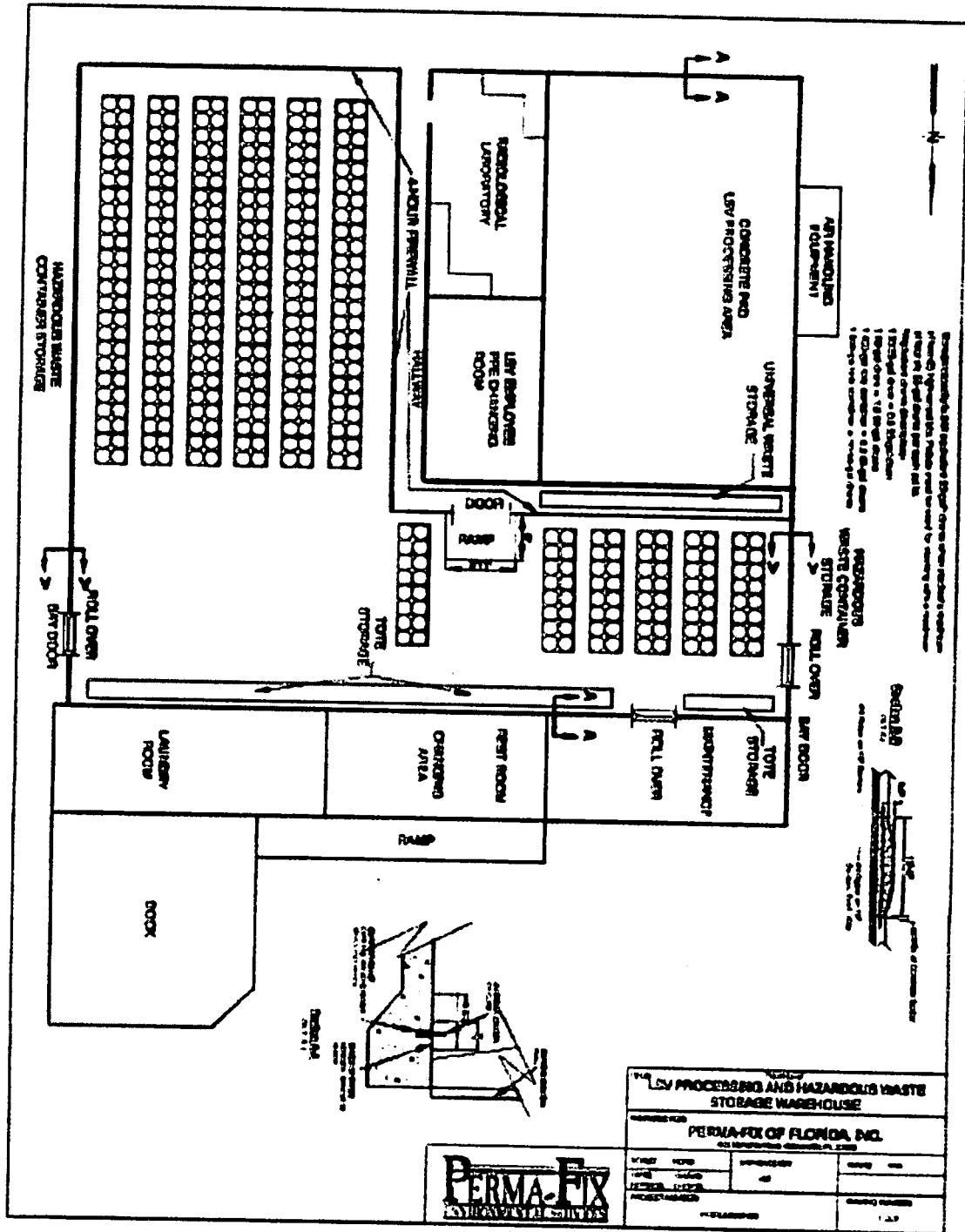
14) **Concurrence**


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

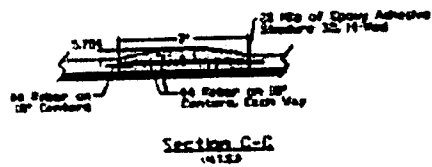
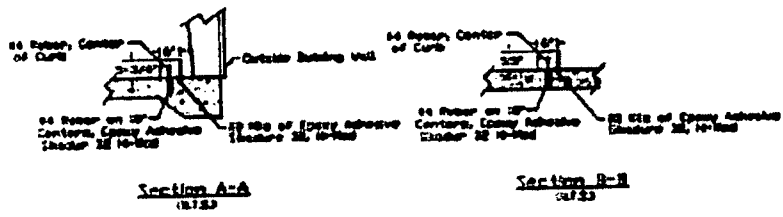
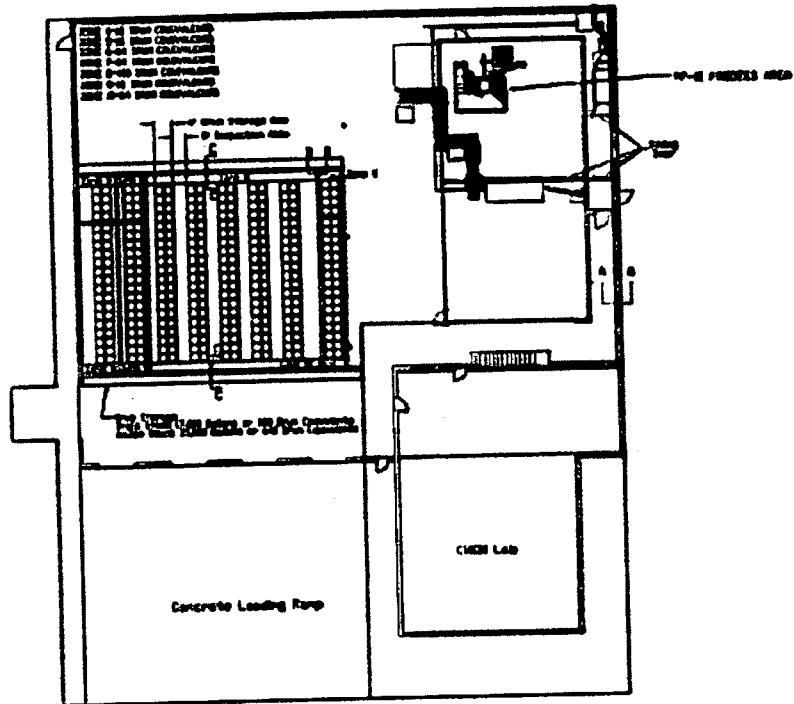
12/17/12
Date

Appendix Photos

LSV Processing and Waste Storage Warehouse

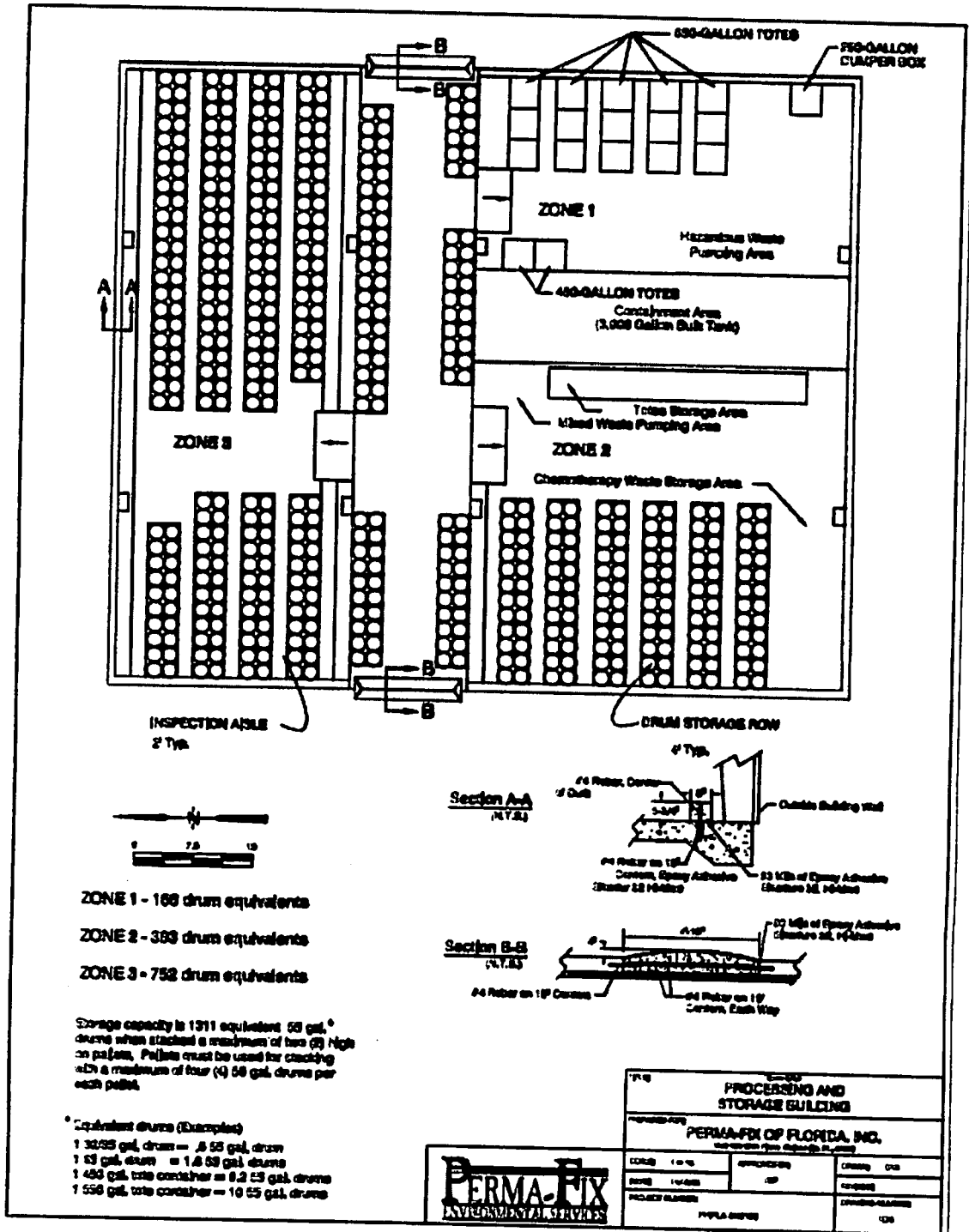


Treatment and Operations Building

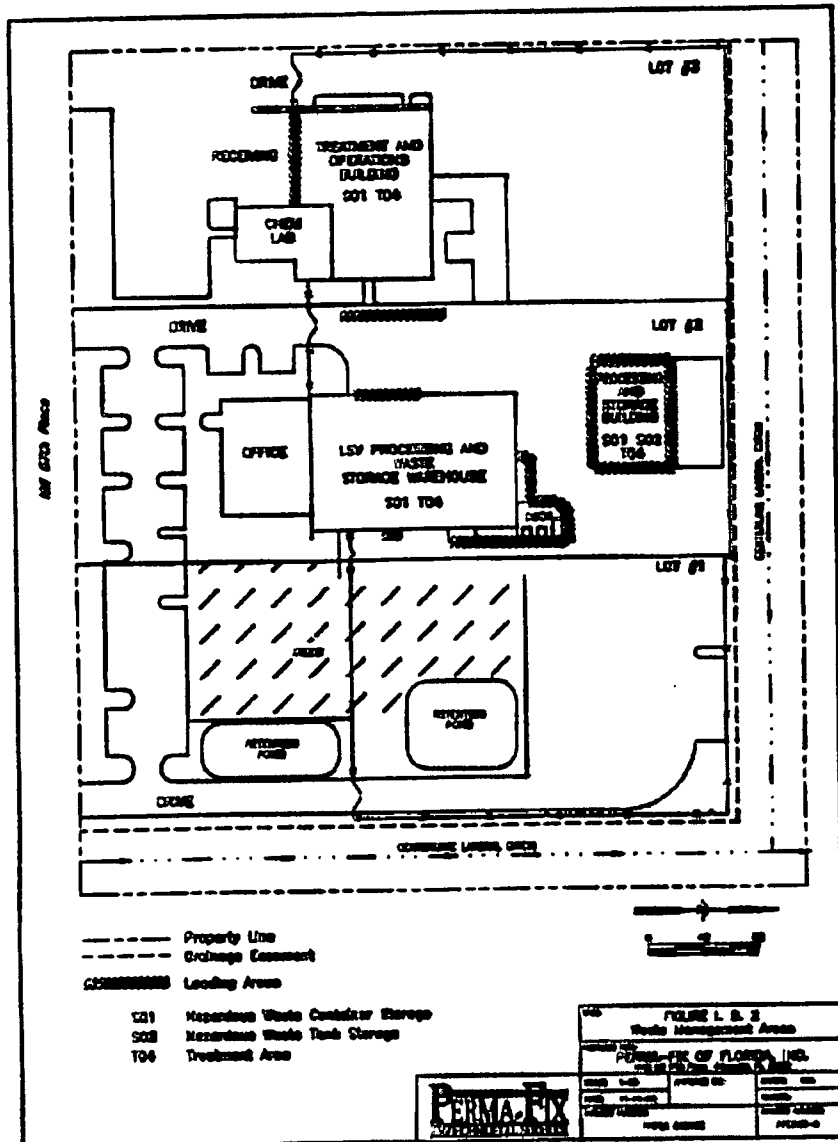


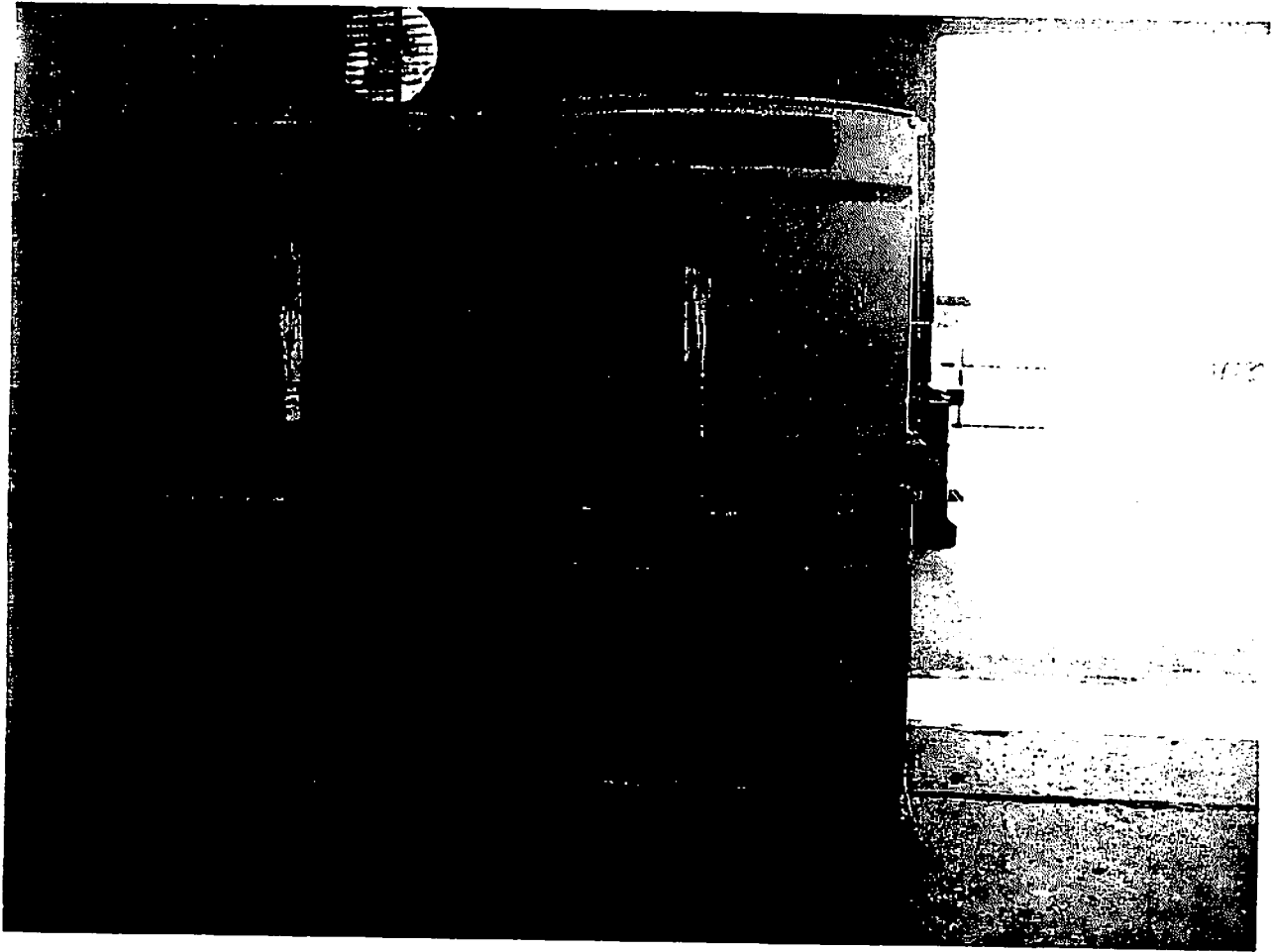
T-100101		
TREATMENT AND OPERATIONS BUILDING		
PERMA-FIX OF FLORIDA, INC.		
2000 W. 10th Ave. Ft. Lauderdale, FL 33305		
DESIGN NO.	APPROVED BY	DATE
210 (20400)		REVISED 12-10-10
PROJECT NUMBER	PERMA 000100	DATE

Processing and Storage Building



Buildings Layout





(Photo 1 Waste Container Storage Area Totes)



(Photo 2 Receiving Area)