



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 1, 2013

Mr. Raymond Whittle, General Manager
Perma-Fix of Florida, Inc
1940 NV 67th Place
Gainesville, Florida 32653
rwhittle@perma-fix.com

Re: Perma-Fix of Florida, Inc
EPA/DEP ID: FLD 980 711 071
Alachua County – Hazardous Waste

Dear Mr. Whittle:

The Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on September 17, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager
Northeast District

Enclosure(s)



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Perma-Fix Of Florida Inc

On-Site Inspection Start Date: 09/17/2013

On-Site Inspection End Date: 09/17/2013

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 LQG (>1000 kg/month) facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Ashwin Patel, Inspector; 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 September 17, 2013, by the Department of Environmental Protection's (Department) Hazardous Waste Section as an unannounced compliance inspection.

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 was last inspected by the Department's Hazardous Waste Section on November 15, 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. Randy Self, Dwayne Singleton, and Raymond Whittle from Perma-Fix also participated in the inspection.

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Perma-Fix has a sister facility in Valdosta, Georgia (GAD093380814) which performs similar treatment and storage operations. The Valdosta facility had an explosion and fire on August 14, 2013, which is still under investigation. Most of the focus of this inspection was to determine the likelihood of a similar event happening at its Gainesville, Florida location.

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 from the fuel blending process.

The facility was storing large metal totes that contain hazardous waste waters in Zone 1 of the PSB. These totes were on the edge of the storage zone that bordered where the facility parks its tankers for fuel blending (Photo 1). The Department recommended that the facility move these totes farther into the storage zone to prevent the potential for the contents of these containers to spill outside of the zone in the event of an accident.

A 3,000-gallon 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 and has not been used to store any waste since it was installed.

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.

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 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.

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 was labeled "used oil" (Photo 2). This container was changed to read "used oil filters" during the inspection.

TREATMENT AND OPERATIONS BUILDING

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The 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 Attachment B of the permit. Some of the containers that contained oxidizers in Zone 9 were stacked close to the berm. This was an area of concern. Facility personnel were made aware that wastes stored in different zones should be stored in a manner that minimizes the potential for spills or releases into any adjacent storage zones.

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 which 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) accumulating. All were properly labeled, dated, and closed.

RECORD REVIEW:

Perma-Fix of Florida, Inc. is currently a Large Quantity Generator of hazardous waste and a permitted TSD facility. A review of the facility's waste minimization plan, manifests, training records, daily container inspection logs, used oil and hazardous waste transporter insurance and registration, and inspections of emergency equipment revealed no discrepancies. The contingency plan was on-site and up-to-date. Subpart BB records were found to be complete. Subpart BB equipment is used less than 300 hours per year, and therefore must be inspected annually as opposed to monthly. The Subpart BB equipment was inspected on January 22, 2013. In addition, randomly selected records for inbound shipments of waste were reviewed for compliance for required waste screening, selected treatment, and final disposal history. All records reviewed were found to be in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 09/17/2013

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

10/31/2013

DATE

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.