

VOLUME 3 OF 3

PERMIT RENEWAL APPLICATION

*7202 East 8th Avenue
Tampa, FL 33619*

Permit No. 34757-006-SO/30

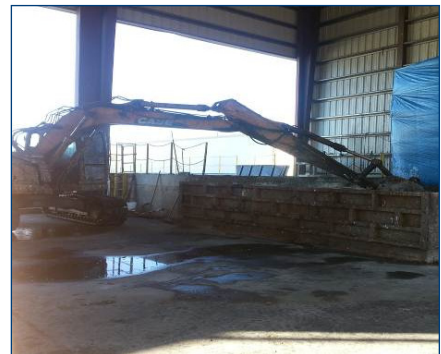
Prepared for

EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619

Prepared by

KCI Technologies, Inc.
10401 Highland Manor Drive, Suite 120
Tampa, FL 33610

November 2013
Revision: 01



VOLUME 3 OF 3

Permit Renewal Application

FOR

Operation of a Solid Waste Processing Facility

AT

**7202 East 8th Avenue
Tampa, FL 33619**

Permit No.: 34757-006-SO/30

Prepared For:

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Tampa, FL 33619**



Prepared By:

**KCI Technologies, Inc.
10401 Highland Manor Drive, Suite 120
Tampa, FL 33610
Project No. 12123014**



**Revision: 01
November 2013**

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Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form #: 62-701.900(4), F.A.C.

Form Title: Application to Construct, Operate, or
Modify a Waste Processing Facility

Effective Date: August 12, 2012

Incorporated in Rule: 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with subsection 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☒ Transfer Station:

☐ C&D

☐ Class III

☐ Class I

☐ Other Describe: _____

☐ Materials Recovery Facility:

☐ C&D Recycling

☐ Class III MRF

☐ Class I MRF

☐ Other Describe: _____

☒ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

☒ Other Describe: Volume reduction, segregation, and repackaging

NOTE: C&D Disposal facilities that also recycle C&D shall apply on DEP Form 62-701.900(6), F.A.C.

2. Type of application:

☒ Construction/Operation

☐ Operation without Additional Construction

3. Classification of application:

☐ New

☐ Substantial Modification

☒ Renewal

☐ Intermediate Modification

☐ Minor Modification

4. Facility name: EQ Florida, Inc.

5. DEP ID number: SWD/29/44633 County: Hillsborough

6. Facility location (main entrance): 2002 Orient Road, Tampa, FL 33619

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8300

Northeast District
7777 Baymeadows Way W, Ste 100
Jacksonville, FL 32256-7590
904-256-1700

Central District
3319 Maguire Blvd, Ste 232
Orlando, FL 32803-3767
407-897-4100

Southwest District
13051 N Telecom Pkwy
Temple Terrace, FL 33637
813-632-7600

South District
2295 Victoria Ave, Ste 364
Fort Myers, FL 33901-3881
239-344-5600

Southeast District
400 North Congress Ave
West Palm Beach, FL 33401
561-681-6600

7. Location coordinates:
Section: 14 Township: 29 South Range: 19 East
Latitude: 27 ° 57 ' 44.2 " Longitude: 82 ° 22 ' 27.6 "
Datum: WGS84 Coordinate Method: Facility Center on Google Earth
Collected by: Christopher Poole Company/Affiliation: KCI Technologies, Inc.
8. Applicant name (operating authority): EQ Florida, Inc.
Mailing address: 7202 East 8th Avenue, Tampa, FL 33619
Street or P.O. Box City State Zip
Contact person: Stuart Stapleton, CHMM Telephone: (813) 319-3423
Title: EHS Manager stuart.stapleton@eqonline.com
E-Mail address (if available)
9. Authorized agent/Consultant: KCI Technologies, Inc.
Mailing address: 10401 Highland Manor Drive, Suite 120, Tampa, FL 33610
Street or P.O. Box City State Zip
Contact person: Christopher Poole, PG, CPG Telephone: (813) 740-2300 x.122
Title: Geo-Environmental Practice Leader christopher.poole@kci.com
E-Mail address (if available)
10. Landowner (if different than applicant): N/A
Mailing address: _____
Street or P.O. Box City State Zip
Contact person: _____ Telephone: (____) _____
E-Mail address (if available)
11. Cities, towns and areas to be served: Southeastern United States
12. Date site will be ready to be inspected for completion: September 2013
13. Estimated costs:
Total Construction: \$ 50,000 Closing Costs: \$ _____
14. Anticipated construction starting and completion dates:
From: July 1, 2013 To: August 30, 2013
15. Expected volume of waste to be received: 10.7 yds³/day 8.9 tons/day

16. Provide a brief description of the operations planned for this facility: Segregation and processing of solid waste for transfer to off-site disposal and recycling facilities.
Detailed discussion of the facility operations is provided in this permit renewal application and supporting documentation.

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
 - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
 - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
 - c. How the materials will be managed or processed;
 - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
 - e. The types of equipment that will be used;
 - f. The maximum time materials will be stored at the facility;
 - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
 - h. The expected disposition of materials after leaving the facility.
2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).
3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).
4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).
5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).
6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).
7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).
8. Unless exempted by subparagraph 62-701.710(1)(d)1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).
9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)
10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)

C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of EQ Florida, Inc.

is aware that statements made in this form and attached information are an application for a Solid Waste Processing Facility

Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.



Signature of Applicant or Agent
Gene Cieply, General Manager

Name and Title (please type)
gene.cieply@eqonline.com

E-Mail address (if available)

7202 East 8th Avenue

Mailing Address
Tampa, FL 33619

City, State, Zip Code
(800) 624-5302

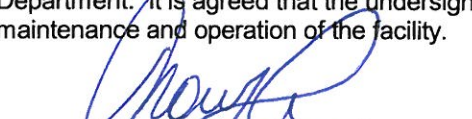
Telephone Number
November 8, 2013

Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.



Signature
Thomas G. Sprehe/Discipline Manager

Name and Title (please type)

73679

Florida Registration Number of
(please affix seal) 

PROFESSIONAL ENGINEER
11/8/13

10401 Highland Manor Drive, Suite 120

Mailing Address
Tampa, FL 33610

City, State, Zip Code
thomas.sprehe@kci.com

E-Mail address (if available)
(401) 241-4067

Telephone Number
November 8, 2013

Date



THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE • WAYNE, MICHIGAN 48184 • tel 800-329-8000 • fax 734-329-8140 • www.eqonline.com

MEMORANDUM OF AUTHORIZATION

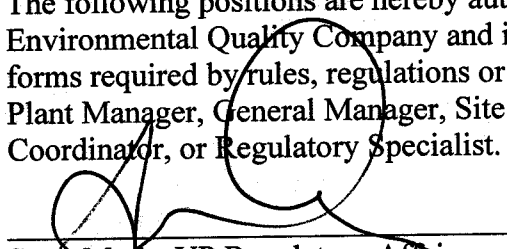
July 6, 2005

From: Scott Maris

Re: Delegation of Authority to sign applications and reports required under RCRA and various state equivalents

Written Authorization to Sign Documents

The following positions are hereby authorized to sign on behalf of EQ The Environmental Quality Company and its subsidiaries letters, reports, applications and forms required by rules, regulations or permits or requested by governmental agencies: Plant Manager, General Manager, Site Manager, Director of HW Operations, Compliance Coordinator, or Regulatory Specialist.



Scott Maris, VP Regulatory Affairs

7/6/05

Date

Regulatory Standards for Authority to Sign

The following standards restrict the signing of applications or reports to certain specified or authorized employees:

270.11(a) Applications: All permit applications shall be signed as follows

(1) For a Corporation: By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means (i) A president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any person who performs similar policy – or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note: EPA does not require specific assignments or delegation of authority to responsible corporate officers identified in Section 27.11(a)(1)(i). The Agency will presume that these responsible corporate officers have the same requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under Section 270.11(a)(1)(i) rather than to specific individuals.

2.0 INTRODUCTION

EQ Florida, Inc. (EQFL) is a division of EQ Holding Company (EQ), Wayne, Michigan. EQFL operates a permitted solid waste processing facility (FDEP ID No. SWD/29/44633) in combination with a hazardous waste treatment and storage facility (EPA ID No. FLD981932494) in Tampa, Florida.

This Engineering Report has been prepared to support a permit renewal application for the solid waste processing operation at EQFL's facility located at 2002 North Orient Road, Tampa, Florida and 7202 East 8th Avenue, Tampa, Florida (contiguous property). The following changes to the existing permit are planned::

7202 East 8th Avenue

The Waste Processing Building will be reconfigured to accommodate a new hazardous waste treatment unit that will be regulated under the facility's RCRA Part B permit. A new non-hazardous waste Engineered Solidification Unit (ESU) and 24-inch high approach ramp will be installed approximately 30 feet to the north of the existing unit in the building (see Figure 9A). The new ESU will be constructed, installed, and operated in a manner consistent with the current unit (see Section 5.3). The current ESU is nearing the end of its operational life and will be dismantled and retired upon installation of the new ESU. The planned dimensions of the new non-hazardous waste ESU are 21 feet long by 21 feet wide by 3 feet high (49 cubic yards). By comparison, the dimensions of the existing unit are 20 feet long by 16 feet wide by 4 feet high (47.4 cubic yards).

The following improvements are also planned in the Waste Processing Building:

- Approximately 5 feet of the existing ramp on the southeast corner of the building will be removed to provide greater operational flexibility in the southern portion of the building;
- Adding a new reactive magazine in the west-central portion of the building;
- Adding a 6,000 gallon oil-water separator tank outside the building adjacent to its northeast corner; and
- Adding a new ramp on the southwest corner of the building providing access to a proposed reagent storage area/temporary hazardous waste staging area.

As discussed herein, the waste processing building is inclusive of the "covered expansion" permitted and constructed during 2010.

2002 North Orient Road

EQFL will not construct the following previously permitted improvements at this property and hereby requests that they be eliminated from the facility's solid waste processing permit:

- Construction of an approximately 3,866 square foot Concrete Loading and Unloading Area.
- Construction of an approximately 1,707 square foot Segregation Area.
- Construction of a new lined dry detention pond for stormwater control.

All reference to these improvements has been removed from this permit renewal application.

This permit renewal application was prepared by EQFL and KCI Technologies, Inc. (KCI) in accordance with the requirements of Chapter 62-701 Florida Administrative Code (F.A.C.) and provides the required

information for agency review and approval. A cross-reference that identifies the applicable portions of the rule and the location in this report of the discussion of the facility's compliance with each applicable section can be found in Appendix A. A copy of this application will be kept at the facility office for reference during all periods of operations.

3.0 FACILITY OVERVIEW

The existing facility is situated on a 4.53-acre property owned by EQ. As stated above, the EQFL facility is located on two contiguous properties: 2002 North Orient Road (referred to from this point forward as the "Orient Road property") and 7202 East 8th Avenue (referred to from this point forward as the "8th Avenue property").

In addition to being a permitted solid waste operation, the EQFL facility is also registered as a hazardous waste treatment and storage facility (TSDF), a 10-day hazardous waste transfer facility, a used oil and filter collection facility, and a universal waste and mercury containing lamps and devices storage facility. The facility hazardous waste operations are currently conducted in accordance with hazardous waste permit number 34875-HO-009.

Figure 1 is a U.S. Geological Survey Quadrangle Map (Brandon Quadrangle) identifying the facility location. Figure 2 is an aerial photograph identifying the facility. The facility location is also identified on Figure 3 which identifies key features of the surrounding area such as water bodies and wells. A boundary survey is included as Figure 4. Figure 5 presents a physical layout of the facility. The current and proposed layouts of the facility are presented on Figures 9 and 9A, respectively.

4.0 SOLID WASTE MANAGED

4.1 Waste Types

The EQFL facility currently manages both bulk and non-bulk wastes. The nature of the wastes managed is not expected to change during the duration of this permit. Bulk wastes are wastes contained in tanks, vacuum trucks, tanker trucks, roll-offs, dump trailers, sludge boxes, or other similar type transportation units. Non-bulk wastes are contained in containers that are smaller in size and that can generally be moved by hand or forklift. These include original product containers (quarts, gallons, etc.), 5-gallon pails, 55-gallon drums, one-cubic yard bags and boxes, tote-tanks (of capacity of up to 500 gallons), and other similar type containers. Most waste currently received and managed consists of non-bulk containers, usually 55-gallon drums.

Wastes managed may include any or all (including combinations) of the following items: petroleum contaminated materials, used oil, coolants, surfactants, latex paints, non-putrescible household wastes, special wastes (lead-acid batteries and asbestos), ashes, wastewaters, wastewater sludges, scrap metal, universal wastes (including mercury-containing lamps and devices), and other non-RCRA regulated solid wastes. Wastes managed may be solid, sludge, or liquid in form. For the purposes of later discussion in this document the term recyclable materials is defined as consisting of batteries, scrap metal, mercury-containing lamps and devices, and universal waste.

Some of the wastes EQFL manages are classified as special wastes. Below is a summary of the special wastes managed, applicable regulations complied with, and permits or registrations (if necessary) for EQFL to manage these special wastes:

Special Waste	Florida Administrative Code	Permit / Registration
Contaminated Soil	62-701, 62-713	34757-006-SO/30
Used Oil and Filters	62-710	FLD 981 932 494
Asbestos	62-701.520	34757-006-SO/30
Mercury Lamps & Devices	62-730.185 and 62-737	FLD 981 932 494
Other Universal Wastes	62-730.185	FLD 981 932 494
Petroleum Contact Water	62-740	FLD 981 932 494
Hazardous Wastes	62-730	34875-HO-009

Wastes specifically excluded from management under the solid waste permit are: hazardous waste, polychlorinated biphenyls (PCBs), radioactive or mixed wastes (wastes that are a mixture of radiological waste and hazardous waste), and bio-hazardous wastes. The management of RCRA-regulated hazardous waste is currently conducted under Hazardous Waste Permit 34875-HO-009.

4.2 Disposal of Material

The ultimate disposition of all wastes will be off-site. No on-site disposal will occur. Liquid and sludge waste will either be sent to approved off-site treatment or disposal facilities in the form they are received or they will be solidified at this facility prior to shipment to approved off-site treatment or disposal facilities. Solids and debris will be sent to off-site treatment facilities or directly to approved and permitted disposal facilities. Used oils and other materials that meet recycling standards will be sent to off-site recycling facilities. Off-site treatment of wastes may include: fuel-blending, incineration, solidification, stabilization, chemical treatment, land application or other approved treatment as allowed by regulation and the disposal facility permit.

Listed below is a summary of solid waste disposal.

Waste	Off-Site Treatment, Disposal, Recycling or Reclamation Methods
Waste Solids and Debris	Landfills, Treatment Facilities, Thermal Treatment Facilities
Waste Liquids	Wastewater Treatment Facilities, Landfills (after solidification)
Waste Sludge	Landfills, Treatment Facilities, Thermal Treatment Facilities
Contaminated Soils	Landfills, Treatment Facilities, Thermal Treatment Facilities
Used Oil and Filters	Oil and Filter Recycling Facilities
Asbestos	Asbestos Landfills
Mercury Lamps & Devices	Reclamation Facilities
Universal Wastes	Reclamation Facilities
Petroleum Contact Water	Reclamation Facilities
Scrap Metal	Recycling Facilities

Waste	Off-Site Treatment, Disposal, Recycling or Reclamation Methods
Hazardous Wastes	Permitted TSD Facilities
Lead Acid Batteries	Reclamation Facilities

4.3 Waste Projections

Most of the wastes received will be in sealed 55-gallon drums. Monthly non-RCRA solid waste receiving is expected to average approximately 1,000 containers. The density of the wastes will vary, but the 55-gallon containers should average approximately 450 pounds each for a total of 225 tons of non-bulk waste received per month. In addition, it is expected that an additional 41 tons of bulk waste will be received in roll-offs and other large containers each month. This equates to an average monthly total of approximately 266 tons of waste received. This quantity is equivalent to approximately 322 cubic yards per month. Processed wastes shipped to off-site disposal or recycling facilities is expected to average one 5,000-gallon tanker of liquid and seven (20 yard) roll-offs or dump trailers of solid per week. The increase in the volume of waste between receipt and shipping is due to the incorporation of solidification agents.

The quantities of waste received and shipped by the facility are not anticipated to change in the future.

5.0 WASTE FLOW AND OPERATIONS SUMMARY

5.1 Waste Flow

The EQFL solid waste management operations include several steps. A waste process flow diagram for the EQFL facility is included as Figure 7 and the operations are summarized below:

- a) The Generator submits a waste profile to EQFL.
- b) The EQFL Compliance & Safety Manager or other knowledgeable personnel reviews the Generator's waste profile.
- c) The Waste profile is rejected, amended, sent back for further information, or approved by EQFL.
- d) Approved waste is scheduled for pick-up or delivery.
- e) Approved waste is transported to the EQFL facility.
- f) Containers are inspected and associated documentation is reviewed at the EQFL facility.
- g) Waste containers are sampled per EQFL Waste Analysis Plan. (provided in Appendix H).
- h) QC analysis is performed on the QC samples per the EQFL Waste Analysis Plan.
- i) Unacceptable waste may be returned to the waste generator or managed as hazardous waste under the EQFL hazardous waste permit.
- j) Waste may be stored in waste management areas as shown in Figure 6. Wastes are stored until sufficient quantities of similar materials are available for recontainerization, transfer to bulk or other containers, processing, or shipment offsite to treatment / disposal facilities.
- k) Segregation of wastes may be conducted if necessary.
- l) Recontainerization/transfer of solid waste will be done if necessary. Small containers may be recontainerized to larger containers or bulk containers such as tankers and roll-offs.

- m) Solid waste processing will occur if necessary and may include decanting, filtration, solidification and/or shredding.
- n) Confirmatory screening or analysis of waste ready for shipment off-site may be done per the EQFL Waste Analysis Plan (Appendix H).
- o) Shipping papers are prepared and reviewed, containers are inspected, and analysis and other documentation (if necessary) are reviewed prior to the waste being shipped off-site for treatment and/or disposal.
- p) Waste is shipped off-site for treatment and/or disposal.

5.2 Operation Summary

Solid waste management operations include processing, staging, storage and management of non-RCRA regulated solid wastes. Processing includes segregation, decanting, filtration, transfer, shredding, or solidification. No on-site disposal will occur. All wastes managed will be sent off-site to other facilities for ultimate disposal or recycling.

Wastes will be received and stored in closed containers such as the manufacturer's original container, 5-gallon pails with lids, 55-gallon drums, one-ton bags and boxes, tote tanks, dump trailers, roll-off boxes, or tankers. Wastes may be separated or consolidated. The primary goal of all on-site processing is to configure wastes for efficient off-site shipment and/or disposal. Recyclable materials such as scrap metals, used oils, and lead-acid batteries will be separated, segregated and/or consolidated for shipment to an off-site recycling facility.

Most bulk shipments managed at the facility currently consist of "pass-through" shipments. Pass-through shipments are shipments that are received, re-manifested and shipped to a disposal facility without any additional handling of the waste. Pass-through shipments are shipped to the disposal facility in their existing container(s) and are not unloaded from the original transport vehicle.

An Operation Plan is included as Appendix C.

5.2.1 Inbound Shipments

Prior to shipping wastes, the waste generator submits a waste profile to EQFL. The waste profile identifies the nature of the waste, the form of the waste, the type of containers of waste, and the expected volume of waste. The EQFL Compliance & Safety Manager or other knowledgeable personnel reviews the generator's waste profile for acceptability. The waste profile is approved by EQFL or if necessary is sent back for further information, amended, or rejected. Once an approved waste profile is in place, the waste is scheduled for pick-up or delivery. The approved waste is then transported to the EQFL facility.

5.2.2 Waste Receiving, Acceptance, Unloading, and Staging

All inbound loads of solid waste will be received upon arrival. Containers and shipment are inspected and associated documentation (manifests, etc.) is reviewed upon arrival at the EQFL facility. Waste containers are inspected and as necessary, sampled per the EQFL Waste Analysis Plan. Quality control analysis is performed on the samples per the EQFL Waste Analysis Plan. After inspection and waste analysis activities are complete, the waste is accepted or rejected. Rejected waste may be returned to the waste generator or managed by EQFL as hazardous waste under the EQFL hazardous waste permit. Accepted wastes are either unloaded or are kept on the

original transport vehicle, re-manifested and shipped to a disposal facility without any additional handling of the waste (“Pass-through” shipments). Delivery vehicles containing inbound shipments awaiting final acceptance are parked in the Staging Area.

Containers may be unloaded from transportation vehicles manually, utilizing a drum cart (or similar type device), or mechanically with a forklift. Containers may be off-loaded at the Waste Management Building, the Covered Processing Area, or at the Waste Processing Building. Bulk containers are usually not unloaded. Bulk containers requiring unloading will be unloaded by pumping, emptying, auguring, or by mechanical means such as a backhoe or loader. The unloading (if required) will be to another container or processing unit. Bulk unloading will occur at the Covered Processing Area or the Waste Processing Building.

Staging is the temporary storage of transportation vehicles of wastes. Staging of inbound loads may occur on the Staging Area, in the Covered Processing Area, in the Waste Processing Building, and in the Solid Waste Operations area as shown in Figure 6. Inbound wastes will be staged for no more than 5 days.

5.2.3 Waste Storage

Non-bulk waste may be stored in one or more waste management area until sufficient quantities of similar materials are available for transfer to bulk or other containers, processing, or shipment offsite to treatment/disposal facilities. Bulk wastes are stored to allow time to accumulate the waste, fill the container completely, process the waste, wait on confirmatory analysis results, and/or to schedule for outbound shipment. Wastes will usually be stored one to three days prior to being processed. Most material will have been processed and shipped off site within thirty (30) to sixty (60) working days. However, the facility aggregates waste for cost effective transportation and disposal and anticipates that one (1) calendar year may be required to accumulate sufficient quantities of some wastes. This one year aggregation time frame is allowable for hazardous wastes under the facility’s hazardous waste permit and EQFL requests the FDEP allow similar flexibility for the aggregation of solid wastes under the solid waste permit. If included as a condition of the facility permit, EQFL will provide notifications to FDEP when wastes are going to be stored beyond the 60 working day timeframe. Notifications will be provided prior to exceeding the 60 working day timeframe, as specified in the facility permit.

The Waste Management Building is the primary location for the storage of non-bulk wastes including containers such as 5-gallon pails, 55-gallon drums, cubic yard bags, cubic yard boxes, 500-gallon tote tanks, palletized containers, and other similar type containers. Both RCRA-regulated hazardous waste and non-RCRA regulated solid waste are managed in the Waste Management Building. Incompatible wastes are stored in separate areas with separate containment areas. Containers will remain closed at all times unless the waste is being processed, transferred or sampled. Additional non-bulk storage may occur in the Covered Processing Area and the Waste Processing Building.

Bulk containers, such as tankers, roll-offs, dump trailers, or portable storage tanks, may be stored in the Covered Processing Area or in the Waste Processing Building.

Recyclable materials (containerized solids) will be stored in the Waste Management Building, in the Covered Processing Area, and on the Staging Area. Scrap metal is collected in a roll-off box located adjacent to the Solid Waste Operations Area.

5.2.4 Segregation

Segregation is a physical process of separating a waste into two or more distinct types of materials to improve waste management. For example: separating a box of sealed containers of paint into two separate boxes, one for latex paint and one oil based paints. Waste segregation activities are completed in the Waste Management Building, Covered Processing Area, and in the northern portion of the Waste Processing Building.

5.2.5 Transfer

Solid waste transfer operations include recontainerization of solid waste that may or may not require further processing. Transfer operations represent the majority of EQFL solid waste operations. Solid waste transfer operations include:

- Repack, pump or empty small (less than 55 gallon) size containers to 55-gallon drums.
- Repack, pump or empty containers (less than one cubic yard) to one cubic yard bags, boxes, or tote tanks.
- Pump liquids and/or sludges to bulk tankers, sludge boxes, vacuum trucks, or similar bulk tanks.
- Empty solids to bulk roll-offs, dump trucks, dump trailers, or similar bulk containers.

Transfer operations may occur in the Waste Management Building, the Covered Processing Area, and the Waste Processing Building.

5.2.6 Processing

Solid waste processing operations are conducted primarily in the Waste Processing Building. Some processing may occur in the Waste Management Building and the Covered Processing Area. Processing operations are discussed in further detail below:

Decanting

Decanting is the process of allowing the waste (typically sludges) to settle to two or more phases. The liquid and/or sludge phase is physically removed from the remaining (usually solid) phase by pouring, pumping, or other similar methods.

Filtration

Filtration is accomplished by pumping liquids and/or sludges through a filter media. EQFL may utilize simple screens to filter out solids during pumping or pouring. The use of screens during pumping or pouring operations is the most common type of filtration used at the facility. The decision to use filtration is done on a case-by-case basis. In all cases, the specific procedure is simply the placement of filter media in line during waste transfer in order to filter out solids. The size, type and placement of the filter media are appropriate for the type and quantity of waste being filtered. This also varies and is determined on a case-by-case basis. The liquids that pass through the filter media or screen are directed into a waste container. The containers may range in size from small jars to drums or roll-off boxes or tankers. Materials are handled in a manner that minimizes the possibility for spillage. This is done by ensuring that containers are not overfilled and by controlling the rate of flow of the pouring or pumping. At no time during the

transfer of materials is waste allowed to flow unattended. All filtering operations occur in the Waste Processing Building. Plastic sheeting may be used to offer additional protection/containment during pumping and/or pouring operations. EQFL may also utilize in-line sand and/or carbon filters to filter solids from liquids or sludges as they are pumped from one container to another. Used filter material will be managed as solid waste in a similar manner as other wastes received by EQFL.

Solidification/Stabilization

Solidification/stabilization is the process of physically solidifying a sludge or liquid waste. The process involves mixing solidification media into a waste to absorb residual free liquids. At the current time, the only solidification agent used at EQFL is sawdust from unadulterated wood. EQFL may, in the future, use other solidification agents such as fly ash, kiln dust or cement on a case-by-case basis. If included as a condition of the facility permit, EQ will provide notifications to FDEP when solidification agents other than sawdust will be used. Notifications will be provided to the Department 14 days prior to the use of alternative agents.

Most solidification occurs in the non-hazardous ESU located in the Waste Processing Building; however, EQFL may solidify some wastes directly in the original waste containers (drums, roll-offs, etc.) or other liquid-tight container if the waste and container are amenable to the operation and increased volume. As discussed above in Section 2.0, a new non-hazardous ESU along with a new approach ramp will be installed in the Waste Processing Building approximately 30 feet to the north of its current location (see Figure 9A). The location of the existing non-hazardous ESU will be converted to a hazardous waste treatment unit, which will be regulated on the provisions of EQFL's RCRA Part B permit. Further details about the non-hazardous waste ESU are presented in Section 5.3.

Small containers (5 gallons or smaller) are opened and poured into the ESU or may be shredded using the industrial shredder (see Section 5.2.6.4). Large containers (5 gallon or larger) are emptied into the solidification unit using a forklift, pump, or other necessary equipment. Bulk wastes are emptied directly from the bulk container into the solidification unit using a pump or by gravity feed. Sawdust used in the solidification process is stored on the west side of the Waste Processing Building. Documentation regarding the sawdust being used for solidification is included in Appendix K.

Shredding

EQFL has installed a shredder in the northwest corner of the Waste Processing Building (see Figure 9). The shredder is used to tear up the waste into smaller pieces thereby reducing transportation liability and reducing waste volume. Waste material, usually consisting of containers of 5 gallons or less that contain residual solids, liquids, or sludges, will be placed into the shredder inlet. The outlet of the shredder directs material into a hopper located directly under the outlet. When the hopper is full, the material will be moved by forklift and emptied into the ESU. For additional details on the shredder equipment see Section 5.3.

Oil Water Separation

A 6,000 gal oil/water separator is proposed to be housed adjacent to the northeast corner of the waste processing building. A schematic of tank construction and operation is included in Appendix M. Operationally, the system uses cam lock fittings and the input and output is through the same pump system with the direction reversed depending on the process being

conducted (i.e., filling or removal). The north, south and east sides of the area adjacent to the oil-water separator will be enclosed by 3-in bump curbs with outside dimensions of 18-ft X 9-ft. The purpose of the bump curbs are to contain any oily wastewater that may leak from the loading or unloading operations and the standard operating procedures required that the vehicle operator remain at the site to observe the filling operations and to prevent any substantial losses due to loose connections, hose break, etc., at which time the valves would be closed to stop the flow.

A tank load of oily wastewater will back up over the bump curbs to the unit, where it will connect to the tank with a 2-in or 3-in hose inlet. From this point the oily water mixture is routed through a coarse filter and pumped into the bottom of the tank. Gravity operation of the contents separates the fluids in the tank into water, “rag,” and oil. There are sample ports set at various heights within the tank which can be opened and the nature of the material can be visually observed at that point. When sufficient oil has accumulated, the oil will be pumped out and sent offsite to a reclaimer and the water will go offsite to an approved wastewater treatment plant. The containment pad is sloped to the northeast toward a sump and accumulations of liquids on the pad will be disposed of in an appropriate fashion based on its makeup.

5.2.7 Waste Shipment Preparation and Loading

Prior to loading an outbound shipment, documentation is prepared and reviewed, shipment details are finalized with the treatment/disposal facility, and non-bulk containers are inspected. Loading will be completed by the same means and in the same locations as unloading. Containers will be loaded to transport vehicles manually, utilizing a drum cart (or similar type device), or mechanically with a forklift. Bulk containers may be loaded by pumping, emptying, auguring, or by mechanical means such as a backhoe or loader. Loaded shipping vehicles awaiting final shipment are parked (staged) in the Staging Area or the Solid Waste Operations Area as shown in Figure 6. Outgoing loads of waste will be staged for no more than ten business days. If wastes must be staged past this timeframe, EQFL will provide notification to the FDEP prior to exceeding that time period.

5.2.8 Outbound Shipment to Treatment, Disposal, and/or Recycling Facilities

After loading, all wastes are shipped to off-site treatment, disposal, and/or recycling facilities.

5.3 Waste Processing Equipment

The EQFL facility utilizes a variety of equipment for managing solid waste. EQFL operates a fleet of vehicles for transporting solid waste. Most of these vehicles are owned by EQFL, however some are leased. Transportation vehicles and equipment include box trailers, roll-offs, sludge boxes, dump trailers, tankers, vacuum trucks, and box vans. These vehicles and equipment are utilized to transport solid waste to and from the facility.

Storage equipment includes drums, cubic yard boxes, cubic yard bags, tote tanks (500 gallons or less), other non-bulk containers, roll-off boxes, sludge boxes, portable skid mounted tanks, frac tanks, and other similar bulk storage containers. Storage equipment may be owned or leased.

Material handling equipment includes forklifts, backhoes/loaders, diaphragm pumps, drum pumps, fork drum handling attachments, drum scales, air compressors, and other similar material handling equipment. Material handling equipment may be owned or leased.

Processing equipment includes sand filters, carbon filters, an industrial shredder, an ESU, and other similar processing equipment. Processing equipment is limited to equipment that changes only the physical state of the waste (liquid, sludge, solid). No chemical treatment will occur at the facility under the provisions of the solid waste processing permit.

The shredder installed in the northwest corner of the Waste Processing Building is a Shred-Tech brand model number ST-50E high volume waste shredder. Waste is introduced into the shredder hopper which feeds directly into the cutting chamber. The cutting chamber is an enclosed area that houses two rows of intermeshing 12.5 inch steel blades which cut the waste into smaller pieces (< 10 inches wide). Waste that has passed through the cutting chamber falls directly down and out of the shredder into a hopper, which is located so that the waste will not fall onto the floor. The shredder discharge hopper is a 2.5 cubic yard 12-gauge steel welded hopper. Shredder personnel visually monitor the hopper to ensure it is not overfilled. When full, the hopper is moved with a forklift and emptied into the non-hazardous ESU. The shredder is intrinsically safe and has a self-contained fire suppression system. It is bolted to the concrete floor. For additional details see Figure 9 and the shredder as-built documentation included in Appendix L.

A detailed shredder operation standard operating procedure (SOP) is provided in the facility Operations Plan (see Appendix C). Material to be shredded is received in various sized exterior containers (such as overpack drums, cubic yard boxes, roll-off boxes, etc.) and fingerprinted according to the Waste Analysis Plan. The exterior containers are then moved to the Waste Processing Building and placed in storage within the containment area. Processing begins with removing the smaller containers (usually consisting of containers of 5 gallons or less) from the exterior container and placing them onto the sorting bin. The purpose of the sorting bin is to ensure a consistent flow of material onto the conveyor and to ensure that each individual container meets the size restrictions. The sorting bin is also sized such that a full “sorting bin” of material can be shredded and not overfill the shredder discharge hopper. After final inspection, personnel working on the work platform manually remove the material from the sorting bin and place it on the conveyor. The conveyor moves the material from the sorting table to the elevated shredder hopper.

A 6,000 gal oil-water separator system is proposed to be housed adjacent to the northeast corner of the waste treatment building (see Figure 9A). A schematic of tank construction and operation is included in Appendix M. The tank will sit on a concrete foundation inside a water stopped containment pad surrounded by a 3.5 feet curb, 6-inch thick, constructed of poured concrete containing Xypex as an admixture to form a crystalline, impervious concrete. The pad will provide sufficient freeboard to contain the contents of the tank plus the 25-yr, 24-hr storm event (a total of 8,770 gallons of containment versus the expected 8,132 gallon largest vessel plus the 25-yr rainfall event). From a practical standpoint, the tank will typically contain 5,400 gallons because the high level liquid sensor is set at 90 percent of tank capacity. The tank will be ground with a separate lightning rod and will be anchored as required.

The proposed tank is 8-foot in diameter and 16 feet tall. It will be constructed of carbon steel to meet UL 142 construction standards. No baffles are proposed for the inside of the tank. The top thickness will be 1/4-inch. The sides will be constructed from two different thicknesses of carbon steel, 1/4-inch from the top down to the first 6 feet, and increasing to 3/16-inch for the bottom 10 feet to the containment pad. When completed, the tank will be sandblasted and painted white with urethane epoxy. A description of the operation of this proposed system is provided in Section 5.2.6.

The ESU is a custom manufactured piece of equipment. Consistent with the existing unit, the new non-hazardous ESU planned at the facility will be constructed of steel plates welded into the shape of a box. The box is planned to be 21 feet wide by 21 feet long by 3 feet tall and have a capacity of approximately 49 cubic yards. The floor and walls of the box will be ½-inch steel plate, and the top of the box will be open. The connections between the plates will be joined together with full penetration welded joints so that the box is liquid-tight and will not allow waste to escape. The new ESU will be bolted to the concrete floor in a manner consistent with the current ESU configuration. Construction and floor bolting details for the new ESU are provided on Figure 9A.

Consistent with current operations, waste to be processed in the new ESU will be deposited directly into the top of it and then solidification agent (sawdust) will be introduced. The materials will be mixed using a backhoe, portable mixer, or similar piece of equipment. Additional solidification agent will be added until no free liquids are present. Solidified waste will be removed from the ESU using a backhoe and loaded into a roll-off box positioned next to it inside the Waste Processing Building.

Safety equipment that may be used during waste processing activities includes personal protection equipment (PPE) such as boots, chemical-resistance suits (such as “Saranex” or “Tyvek”), gloves, and air-purifying respirators. Other safety equipment includes fire extinguishers, fire alarms, fire hoses, smoke and flame detectors, air monitoring meters, supplied air respirators, safety showers, eye washes, overpack drums, absorbent material, dikes, booms, pads, as well as other similar equipment.

5.4 Facility Operation Plan and Recordkeeping

A complete Operation Plan as required by 62-701.710(2)(e), F.A.C. is included in Appendix C and will serve as the operation and maintenance manual. It includes information on facility operations, staff responsibilities, inspections, startup and shut down procedures, training, safety, and fire and security control methods.

Pursuant to the recordkeeping requirements of 62-701.710(8), F.A.C., operational records pertaining to waste management are processed through the administrative office located at the facility. The operational records, consisting of the quantity of waste received and transported and the county of origin of the waste are compiled on a daily basis and filed at the administrative office on site. Records containing information regarding the type of waste and the ultimate off-site treatment or disposal activities are compiled on a monthly basis. These records are submitted to FDEP on a quarterly basis. They are maintained on-site for three years and available for FDEP inspection, upon request.

6.0 FACILITY DESIGN

6.1 Facility Layout and Design

The EQFL facility is located in an industrial area of Tampa that is zoned heavy industrial. The facility is located on two contiguous properties the Orient Road property and the 8th Avenue property. The property is generally level and the ground surfaces consist of buildings, impervious (concrete or asphalt) surfaces, and pervious surfaces (earth or crushed stone and shell).

Structures on the Orient Road property include the Waste Management Building, the Covered Processing Area which is attached to the Waste Management Building, a Staging Area, and an office building.

Structures on the 8th Avenue property include a two story office building, which includes a work bay used as the Solid Waste Operations Area, and the Waste Processing Building.

The Waste Management Building is fully enclosed and is therefore equipped with a ventilation system. All other areas used for waste management activities are open on a least one side and therefore mechanical ventilation is not necessary. The wastes managed at this facility are not typically light enough to be blown from the area by the wind and become a litter problem and therefore litter control devices are not utilized. The facility property is informally inspected on a routine basis and any litter is collected and managed along with other similar solid waste.

To allow work to occur 24-hours a day, the Waste Management Building and Waste Processing Building are lighted in accordance with OSHA requirements (specifically 29 CFR 1926.56).

Descriptions of the facility structures used for waste management are presented below in Sections 6.1.1 through 6.1.5. Additional discussion regarding waste storage capacities and secondary containment measures are described in Section 6.2.

6.1.1 Waste Management Building

The Waste Management Building is used to store received waste pending processing and/or shipment to an off-site facility. Operations conducted at the Waste Management Building include receiving, storage, unloading, loading, transfer and minor processing of solid waste. A diagram of the Waste Management Building is provided as Figure 8. The building is a one story masonry building with four walls and a roof. The west side of the building consists of loading docks which allow wastes to be delivered to and removed from the building.

6.1.2 Covered Processing Area

The Covered Processing Area is used for loading, unloading, storing, transfer, and minor processing of solid waste. The Covered Processing Area is located directly to the west of the Waste Management Building and covers the loading docks of that building. The Covered Processing Area has a roof and it is open to the Staging Area on the west side and the Waste Management Building on the east side. A diagram of the Covered Processing Area is found in Figure 8.

6.1.3 Staging Area

The Staging Area is used for receiving and staging of solid waste. The Staging Area is located directly to the west of the Covered Processing Area. The Staging Area consists of a paved or concrete surface and curbing and related drainage control features. A diagram of the Staging Area is found in Figure 8.

6.1.4 Waste Processing Building

The Waste Processing Building is used for the receiving, processing, and associated storage, loading, unloading, and transfer of solid waste. The building consists of a concrete pad and a steel roof structure. The north and south sides of the structure are solid walls and the east and west sides are open in the southern two-thirds of the building to allow for the movement of waste and equipment in and out of the structure. The east and west walls of the building are closed in its northern third. The solid waste processes completed in this structure include segregation, decanting, filtration, solidification, and shredding. The non-hazardous ESU is located in this building along with the high volume industrial waste shredder. An approach ramp and 4-foot high platform are located on the southeast side of the structure that allow waste to be emptied from trucks and containers directly into the non-hazardous ESU.

As discussed previously herein, EQFL plans reconfigure this building to accommodate a new hazardous waste treatment unit that will be regulated under the facility's RCRA Part B permit. The new hazardous waste treatment unit will be installed adjacent to the existing ramp on the southeast corner of the building. A new non-hazardous waste ESU and associated 24-inch high approach ramp will be installed approximately 30 feet to the north of the existing unit in the building. The new ESU will be constructed, installed, and operated in a manner consistent with the current unit (see Section 5.3). The current ESU is nearing the end of its operational life and will be dismantled and retired upon installation of the new ESU. The proposed dimensions of the new non-hazardous waste ESU are 21 feet long by 21 feet wide by 3 feet high (49 cubic yards). By comparison, the dimensions of the existing unit are 20 feet long by 16 feet wide by 4 feet high (47.4 cubic yards).

The solid waste side of the operations will be kept separate from the hazardous waste operations in the waste processing building by demarcating the areas with a bright yellow, 12-in line, painted on the floor, between the two existing ramps located near the center of the building on the east and west sides. It will also be labeled as to the non-hazardous (northern portion of the building) and hazardous (southern portion of the building) waste operations sides. A similar line will also be placed around the reactivities magazine along with the addition of protective bollards.

The following improvements are also planned in the Waste Processing Building:

- Approximately 5 feet of the existing ramp on the southeast corner of the building will be removed to provide greater operational flexibility in the southern portion of the building;
- Adding a new reactive magazine in the west-central portion of the building;
- Adding a 6,000 gallon oil-water separator tank outside the building adjacent to its northeast corner (see Sections 5.2.6 and 5.3 and Appendix M); and
- Adding a new ramp on the southwest corner of the building providing access to a proposed reagent storage area/temporary hazardous waste staging area.

Existing conditions within the Waste Processing Building are detailed on Figure 9, while the modified layout of the building following the planned reconfiguration to accommodate the new hazardous waste treatment unit is detailed on Figure 9A.

6.1.5 Solid Waste Operations Area

The Solid Waste Operations Area is used primarily for the temporary staging of roll-off containers generated at the Waste Processing Building. After processing, wastes are loaded into roll-off containers that are then moved to this area where they are staged for outbound transportation to an off-site disposal facility. Only solids or solidified wastes are stored in this area. Storage may also include decharacterized hazardous waste meeting the Land Disposal Restrictions (LDR) under RCRA as described in Section 2.3 of the Hazardous Waste Permit application. There is no processing of waste or storage of liquid wastes in this area. Temporary staging at the Solid Waste Operations Area lasts no more than ten business days. If wastes must be staged past this timeframe, EQFL will provide notification to the FDEP prior to exceeding that time period. The Solid Waste Operations Area is enclosed by walls on the north and east sides and open on the south and west sides. The area has a roof and a level concrete slab floor. A drawing of the area is presented as Figure 10.

6.2 Waste Storage Capacity and Secondary Containment Capacity

Waste storage capacity for the facility has been determined by the maximum volume of waste that can be stored in each structure based on its physical dimensions, structural layout, and EQFL storage practices. EQFL does not expect to store the maximum allowable volume of waste at the facility but has prepared this calculation for permitting and planning purposes. The total capacity at the facility is 290,960 gallons of waste.

Structures that may store liquid waste materials, and where operations include processing wastes, have been designed to provide secondary containment for those wastes. Secondary containment volume has been designed to contain at least 110 percent of the largest single container of waste expected to be stored in an area or ten percent (10 percent) of the maximum total volume of waste stored in the area, whichever is greater. As there are no specific design requirements identified in Chapter 62-701.710, F.A.C., the containment has been designed to meet the RCRA hazardous waste secondary containment requirement of 40 CFR 264.175(b)(3), which has been used as guidance in this matter. Structures that include secondary containment are the Waste Management Building, the Covered Processing Area, and the Waste Processing Building.

The remaining waste-related areas at the facility; i.e., the Staging Area and the Solid Waste Operations Area, will only be used to receive, or stage wastes. Processing of waste will not occur in these areas. Wastes received or staged will be contained in sealed/covered Department of Transportation (DOT) approved containers that are ready for transport on the highway.

The applicable design requirements of Chapter 62-701.710(3)(b), F.A.C. require in part that, “the facility be designed with a leachate control system to prevent discharge of leachate.” However, there are no design requirements specified. EQFL has determined that the areas that will only be used to receive or stage waste in DOT containers pose a minimal risk of generating leachate. Therefore, these areas have not been designed with structural secondary containment. Instead these areas will be controlled by best management practices and a strong spill response capability.

The use of operational controls rather than structural controls is in keeping with guidance obtained from other environmental programs such as the 40 CFR 112 for oil spill prevention and 40 CFR 122 for stormwater pollution prevention. In fact, per 62-620.200(48), F.A.C. and related guidance, a facility that only handles closed containers in an uncovered outdoor location is allowed to claim there is no exposure of industrial activities to stormwater and to obtain a conditional exclusion from stormwater permitting.

Operational procedures for these areas (the Staging Area and the Solid Waste Operations Area) include:

- Waste containers will be closed or covered.
- Containers will be inspected on a regular basis for leaks.
- Spill clean-up materials and spill response personnel will be available to respond to these areas in the event of a release.

Additional discussion of the storage and containment capacity of each area is provided in the following sections. Detailed waste storage and containment calculations are presented in Appendix B.

6.2.1 Waste Management Building

The Waste Management Building has a storage capacity of 50,000 gallons of containerized (non-bulk) wastes based on the structural containment capacity. The combined capacity of the Waste Management Building and the Covered Processing Area is limited to 50,000 gallons according to the EQFL hazardous waste permit. The building is divided into five bays which are numbered from the north to the south as Bay #1A, 1B, 2, 3A, and 3B. Each of these bays has its own below-grade sumps for containment. The floor of each bay slopes from all sides to their respective sumps. Each sump has a capacity of 1,001 gallons for a total of 5,005 gallons containment. This provides containment greater than the largest container (500-gallon tote-tank) and greater than 10 percent of the warehouse maximum storage capacity (50,000). Each sump is blind/dead ended so that contained materials cannot be accidentally released.

Liquids accumulated in the containment sumps, from leakage or spills of containers (if any), will be placed in containers by suitable means (such as pumping to drums) and managed as the waste which caused the leak or spill.

6.2.2 Covered Processing Area

The Covered Processing Area has a storage capacity of 50,000 gallons of wastes based on the structural secondary containment provided. The combined capacity of the Waste Management Building and the Covered Processing Area is limited to 50,000 gallons according to the EQFL hazardous waste permit. The Covered Processing Area is divided into the following sub-areas: Area A, Area B, and Area C as illustrated in Figure 8. Area A is bounded by a concrete half-wall on the north, the Waste Management Building on the east, a concrete ramp on the south, and is open to the west. Area B is bounded by a concrete half-wall on the north, the Waste Management Building on the east, a concrete half-wall on the south, and is open to the west. Area C is bounded by a concrete half-wall on the north, the Waste Management Building on the east, a concrete half-wall on the south, and is open to the west.

The floor of each sub-area slopes towards the center from the west and east. In Area A and Area C there is a trench drain that runs north to south along the centerline of the area. The trench drain in Area C is connected to the trench drain in Area A through a subsurface pipe running under Area B. Area B was not constructed with a trench drain; rather containment for Area B is provided by the slope of the concrete floor and the concrete half-walls on either side of the area. Liquids that might accumulate in Area B are either removed by wet vacuuming (to be processed in the solidification process) or may be drained into the trench drain in Area C via a valve in the retaining wall between the two areas. The valve between Areas B and C is kept locked in the closed position unless it is needed.

Stormwater that may enter the Covered Processing Area is defined as “potential contact” stormwater. The trench drain discussed above discharges to a 1,004-gallon concrete sump located to the south of the Covered Processing Area. The sump allows for the holding and visual inspection of the liquid and acts as the final secondary containment for the area. After manual visual inspection, the potential contact stormwater can be pumped from the sump by a manually actuated sump pump through a sand filter and a carbon filter prior to discharging to the existing on-site infiltration basin. A comprehensive discussion regarding the operational procedures of this potential contact stormwater management system is provided below in Section 7.1.

6.2.3 Staging Area

The Staging Area has a staging capacity of 35,200 gallons. This concrete area contains concrete curbing and is graded to allow flow to be directed to the trench drain at the southern end of the Staging Area. The Staging Area is to be used for temporary staging of covered tractor-trailers. There is no planned leachate collection system for secondary containment purposes. Liquid is collected in storm drains and transferred to the stormwater detention pond to the east, along Orient Road.

6.2.4 Waste Processing Building

The 8,050 sq. ft. Waste Processing Building has a total storage capacity of 173,532 gallons. The entire Waste Processing Building is surrounded by a concrete curb. The slab in the north side of the building (the original building area) is sloped towards the center of the north side, which directs liquids towards a 50-gallon subsurface sump in that location. The concrete slab in the southern portion of the building (the building expansion area) is sloped towards a subsurface sump located near the south side of the building. These sumps allow for more efficient removal of liquids. Liquids accumulated in the sumps, from leakage or spills of containers (if any), will be managed as the waste which caused the leak or spill and be placed into the appropriate ESU (non-hazardous or hazardous), a tanker truck, or other container by suitable means (such as pumping to drums). Spillage of liquids on the hazardous waste side of the operations (southern end of the building) will be routed to the sump in this portion of the building. Spillage of liquids on the non-hazardous side of the operations (northern end of the building) will be primarily routed to the sump in this portion of the building, although some may drain to the sump in the hazardous waste operations area.

The building curbing and subsurface sumps provide 28,015 gallons of containment. This is sufficient to hold 110 percent of the largest planned container (the 14,064 gallon constructed steel welded box hazardous waste treatment unit) or 10 percent (17,353 gallons) of the total volume of waste (173,532 gallons) that can potentially be stored in the Waste Processing Building, whichever is greater.

6.2.5 Solid Waste Operations Area

The capacity of the 2,288 sq. ft. Solid Waste Operations Area is 20,200 gallons. No liquid wastes are placed in this area and no waste processing occurs in this area. Therefore, there is no leachate collection system for secondary containment purposes in the area. Furthermore, the Solid Waste Operations Area is covered to prevent stormwater contact with the waste temporarily staged here. Although no liquid wastes are placed in this area and no leachate is anticipated, were liquids to accumulate in the area they will be contained by absorbents, placed in containers by suitable means (such as pumping to drums), and managed as the waste which caused the leak or spill.

7.0 STORMWATER MANAGEMENT

The EQFL facility is covered under an Environmental Resource Permit (ERP), permit number 29-0246914-002, issued by the FDEP. The EQFL facility is also covered under a *Multi-Sector Generic Permit (MSGP) for Stormwater Discharge Associated with Industrial Activity*, facility ID number FLR05E179, issued by the FDEP and has a Stormwater Pollution Prevention Plan (SWPPP) as required by this permit. The SWPPP is updated to reflect any changes at the facility as required by the MSGP.

Surface water flow, drainage improvements, and run-off for the facility are indicated on Figure 11. Both properties have existing on-site wet infiltration basins that allow percolation of stormwater to the subsurface.

Stormwater management includes preventative maintenance, which involves the regular inspection and testing of facility equipment and operational systems. These inspections are designed to uncover conditions such as cracks or slow leaks that could cause breakdowns or failures that result in discharges of materials to storm sewers or surface waters. The program is designed to prevent breakdowns and failures by adjustment, repair, or replacement of equipment.

Related equipment, including the sump/pump/filter system, is inspected on a quarterly basis to insure integrity, therefore minimizing spill or leak potential. Records of the quarterly inspections are kept onsite for a period of three years.

7.1 Orient Road Property Stormwater Improvements

Stormwater falling on impervious surfaces at the Orient Road property flows to an on-site infiltration basin. The basin has an emergency riser system which leads to an outfall structure discharging to a ditch along Orient Road. The emergency riser system passes larger size storms. The 1-inch precipitation runoff is allowed to percolate through the soil, although inefficiently due to the high ground water.

As discussed above in Section 6.2.2, stormwater that may enter two areas under the existing Covered Processing Area is defined as potential contact stormwater. All potential contact stormwater is collected via a system of drains and flows first to a sump. The potential contact stormwater is pumped from the sump (by a sump pump) through a sand filter and a carbon filter prior to flowing to the existing on-site infiltration basin. The sand filter is inspected periodically and may be back flushed when required. The carbon filter is changed every six months.

The sump pump located in the blind sump for the potential contact stormwater management system is manually activated by plugging the pump power cord into an outlet. In this way the pump is shut down during transfer and processing operations and only activated when needed to process water from the sump. This allows any collected stormwater to remain in the contained area and sump. Should a discharge to the system be suspected during transfer or processing operations, the captured stormwater will be pumped to a tank or tanker to be solidified onsite or sent offsite for treatment or disposal at an appropriate facility. After a stormwater event and after the completion of waste transfer and processing operations, the area will be inspected and cleaned (if necessary) prior to activating the sump pump to process the collected water thru the sand and carbon filters. The piping from the sump pump to the sand/carbon filters is fitted with two valves that will either direct the water through the filters or allow the water to bypass the filters. Under normal conditions the bypass valve remains closed. The bypass valve is only to be used in emergency circumstances and must be approved by the FDEP and the City of Tampa.

The area controlled by the potential contact stormwater management system also contains EQFLs permitted hazardous waste operations. Both the FDEP and EPA Region IV have inspected the stormwater management system during a Solid Waste Management Unit RCRA Facility Assessment. The system is covered by the RCRA portion of the EQFL Hazardous Waste Permit as well as the Hazardous and Solid Waste Amendments portion of the EQFL Hazardous Waste Permit. The system is also covered by EQFL's General Stormwater Permit issued by FDEP.

The non-contact stormwater that flows from the Waste Management Building roof and the Staging Area is directed to the existing infiltration basin to the east of the Waste Management Building, through storm drain entry or through the ditch along Orient Road.

7.2 8th Avenue Property Stormwater Improvements

The Waste Processing Building is a covered area and stormwater-wastewater or stormwater solid waste contact does not occur. The stormwater from the Waste Processing Building drains through a roof drain trunk line system to the existing stormwater retention basin. Any stormwater that enters the building is pumped out with a vacuum-truck or portable pumps, or is placed in other containers, sampled, tested, and either treated onsite or sent offsite for liquid treatment and/or disposal, as appropriate. Stormwater that contacts the hazardous waste processing area will not be placed into the non-hazardous waste ESU without supporting testing to determine that the contact stormwater is non-hazardous and non-reactive with solid waste processed in the unit..

The infiltration basin previously located at the facility was converted to a stormwater retention basin during the expansion of the Waste Processing Building in 2010. Due to the high groundwater conditions at the facility, the infiltration basin was not effective at driving collected stormwater through the soils. The groundwater table is found at approximately 1-foot below the bottom of the stormwater retention basin and the seasonal high water table is estimated to be approximately 1-foot above the bottom of the stormwater retention basin. The stormwater retention basin was sized to pass the 2-yr, 10-yr, 25-yr, and 100-yr storms safely through the small drawdown orifice, notched weir, and over the proposed emergency riser.

The non-contact stormwater that flows from the roof of the existing Office Building, including the Solid Waste Operations Area, runs off as sheet flow to the southeast and ends up flowing into a ditch along 8th Avenue.

8.0 CONTINGENCY PLAN

The Contingency Plan as required by 62-701.710(2)(g), F.A.C., is included as Appendix D.

9.0 FACILITY CLOSURE

EQFL plans to operate the solid waste facility as long as economically and environmentally possible. There are currently no plans to stop solid waste management activities or close the facility. However, in keeping with 62-701.710(2)(f), F.A.C., a Closure Plan has been prepared and is attached as Appendix E. The Closure Plan was prepared to plan, prepare, and secure financial assurances so that closure could be completed, if required, and includes estimated closure costs used to secure proof of financial assurance (see Section 10.0).

10.0 FINANCIAL ASSURANCE

Pursuant to Rule 62-701.630, F.A.C., amended August 12, 2012, proof of financial assurance is no longer required as a condition of the issuance of this permit, but the facility cannot operate without proof of adequate financial assurance, which will be provided.

11.0 HISTORY OF ENFORCEMENT ACTIONS

EQFL has operated this facility as a hazardous waste 10-day transfer operation, a hazardous waste treatment and storage operation, and/or a solid waste management operation for over ten years. Most regulatory agency findings, especially those in recent years, have been minor in nature and corrected on

the spot or shortly after being identified. There are no outstanding regulatory concerns at this time for either the solid waste or hazardous waste operations. Regulatory agency inspections are on file at the respective agencies. Pursuant to 62-701.320(7)(i), F.A.C., Appendix G is provided to summarize historical enforcement actions at this facility.

12.0 ADDITIONAL DOCUMENTATION TO SUPPORT APPLICATION

12.1 Proof of Property Ownership

In accordance with 62-701.320(7)(g), F.A.C., proof of property ownership is provided in Appendix I. An ordinance vacating Parcel 6 that identifies EQ as the owner is also provided in Appendix I.

12.2 Airport Safety

In accordance with 62-701.320(13), F.A.C., it has been determined that the property boundary of the EQFL facility is not located within 10,000 feet of any licensed and operating airport runway used by turbine powered aircraft nor is the facility property boundary located within 5,000 feet of any licensed and operating airport runway used only by piston engine aircraft. The closest airport to the facility is the Vandenberg Airport which is located more than 17,000 feet northeast of the EQFL facility.

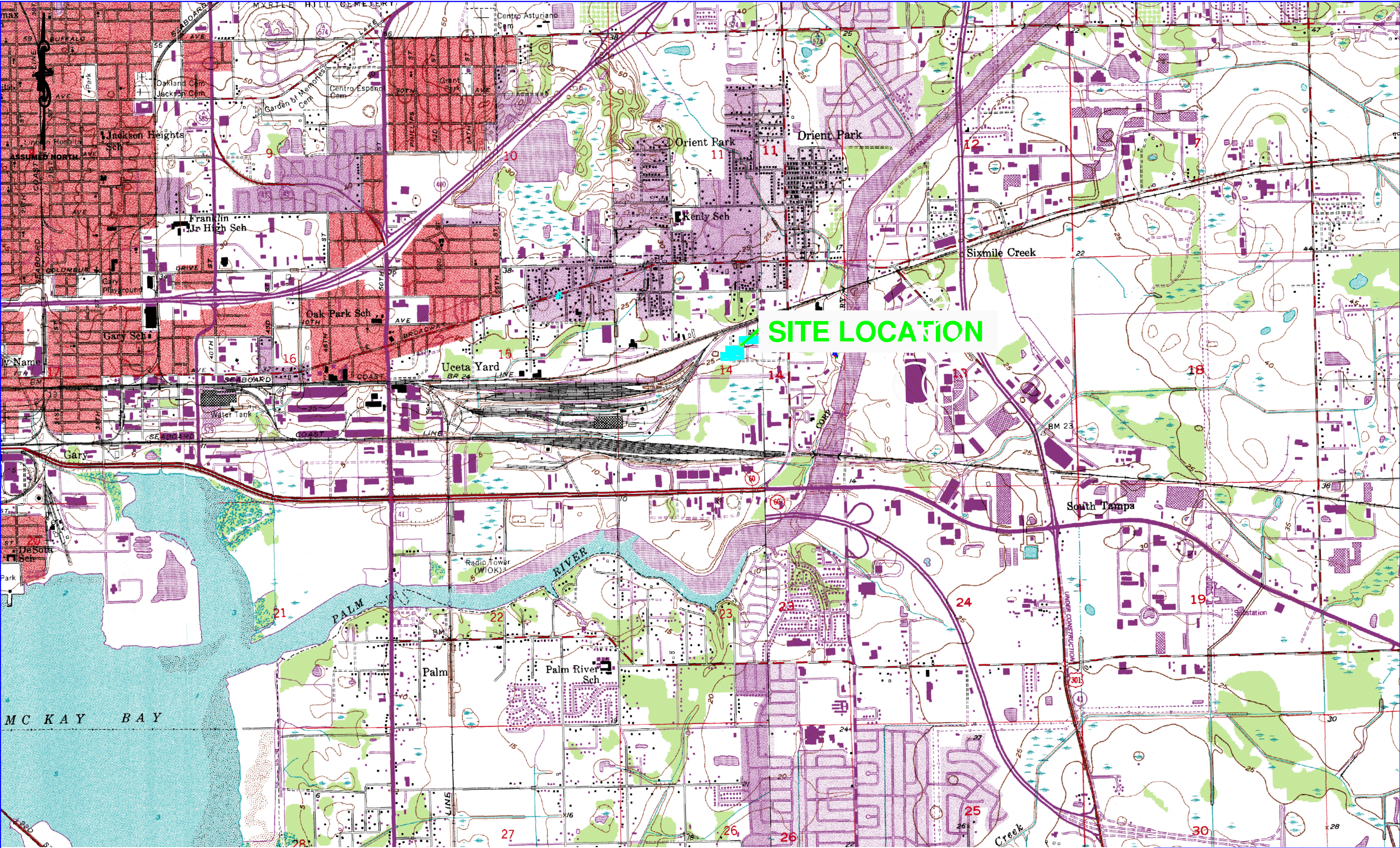
12.3 Compliance With Prohibitions

Documentation of the EQFL's compliance with 62-701.300, F.A.C. has been included in Appendix J.

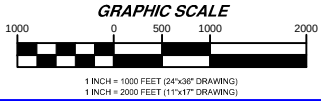
13.0 NOTIFICATION

This permit application includes relocation and construction of the non-hazardous waste ESU as well as operational changes in the Waste Processing Building to incorporate hazardous waste treatment/solidification and storage activities. Notice of the Application will be published following receipt of the Department's intent to issue the permit. Proof of publication will be included in Appendix F.

FIGURES



SOURCE:
1. DRG-USGS DIGITAL RASTER GRAPHICS (TOPOGRAPHIC MAPS) (MSRMAPS.COM)



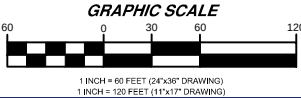
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LICENSED BUSINESS 6901
10491 HIGHLAND MANOR DRIVE, SUITE 120
TAMPA, FL 33610
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FIGURE 1
USGS QUADRANGLE MAP
FOR
EQ FLORIDA, INC.
DATE: MAY 22, 2023 SCALE: 1"=1000' SHEET: 1 OF 15

KCI JOB# 12123014



SOURCE:
1. http://data.labins.org/2003/MappingData/DOQQ/hi-res_search.cfm



KCI JOB# 12123014

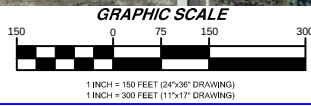


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FIGURE 2 AERIAL PHOTOGRAPH FOR EQ FLORIDA, INC.		
DATE: MAY 22, 2013	SCALE: 1" = 60'	SHEET: 2 OF 15



SOURCE:
1. http://data.lbins.org/2003/MappingData/DOQQ/hi-res_search.cfm

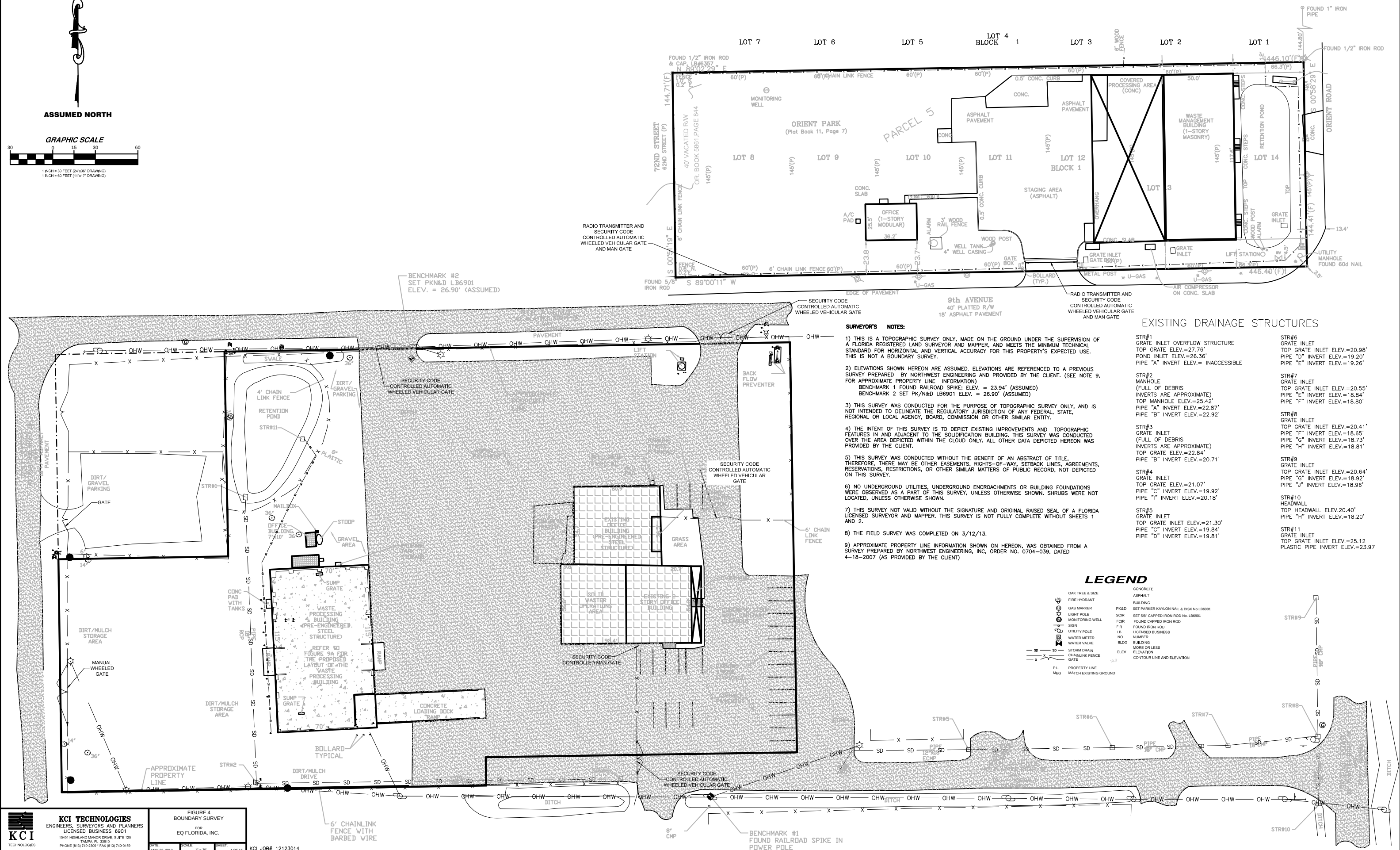
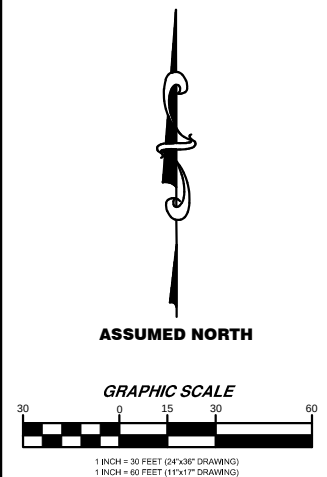


KCI JOB# 12123014



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FIGURE 3 SITE AREA/LOCATION MAP			
FOR EQ FLORIDA, INC.			
DATE: MAY 22, 2013	SCALE: 1" = 150'	SHEET: 3 OF 15	



SURVEYOR'S NOTES:

1) THIS IS A TOPOGRAPHIC SURVEY ONLY, MADE ON THE GROUND UNDER THE SUPERVISION OF A FLORIDA REGISTERED LAND SURVEYOR AND MAPPER, AND MEETS THE MINIMUM TECHNICAL STANDARD FOR HORIZONTAL AND VERTICAL ACCURACY FOR THIS PROPERTY'S EXPECTED USE. THIS IS NOT A BOUNDARY SURVEY.

2) ELEVATIONS SHOWN HEREON ARE ASSUMED. ELEVATIONS ARE REFERENCED TO A PREVIOUS SURVEY PREPARED BY NORTHWEST ENGINEERING AND PROVIDED BY THE CLIENT. (SEE NOTE 9, FOR APPROXIMATE PROPERTY LINE INFORMATION)
BENCHMARK 1 FOUND RAILROAD SPIKE; ELEV. = 23.94' (ASSUMED)
BENCHMARK 2 SET PK/N&D LB6901 ELEV. = 26.90' (ASSUMED)

3) THIS SURVEY WAS CONDUCTED FOR THE PURPOSE OF TOPOGRAPHIC SURVEY ONLY, AND IS NOT INTENDED TO DELINEATE THE REGULATORY JURISDICTION OF ANY FEDERAL, STATE, REGIONAL OR LOCAL AGENCY, BOARD, COMMISSION OR OTHER SIMILAR ENTITY.

4) THE INTENT OF THIS SURVEY IS TO DEPICT EXISTING IMPROVEMENTS AND TOPOGRAPHIC FEATURES IN AND ADJACENT TO THE SOLIDIFICATION BUILDING. THIS SURVEY WAS CONDUCTED OVER THE AREA DEPICTED WITHIN THE CLOUD ONLY. ALL OTHER DATA DEPICTED HEREON WAS PROVIDED BY THE CLIENT.

5) THIS SURVEY WAS CONDUCTED WITHOUT THE BENEFIT OF AN ABSTRACT OF TITLE. THEREFORE, THERE MAY BE OTHER EASEMENTS, RIGHTS-OF-WAY, SETBACK LINES, AGREEMENTS, RESERVATIONS, RESTRICTIONS, OR OTHER SIMILAR MATTERS OF PUBLIC RECORD, NOT DEPICTED ON THIS SURVEY.

6) NO UNDERGROUND UTILITIES, UNDERGROUND ENCROACHMENTS OR BUILDING FOUNDATIONS WERE OBSERVED AS A PART OF THIS SURVEY, UNLESS OTHERWISE SHOWN. SHRUBS WERE NOT LOCATED, UNLESS OTHERWISE SHOWN.

7) THIS SURVEY NOT VALID WITHOUT THE SIGNATURE AND ORIGINAL RAISED SEAL OF A FLORIDA LICENSED SURVEYOR AND MAPPER. THIS SURVEY IS NOT FULLY COMPLETE WITHOUT SHEETS 1 AND 2.

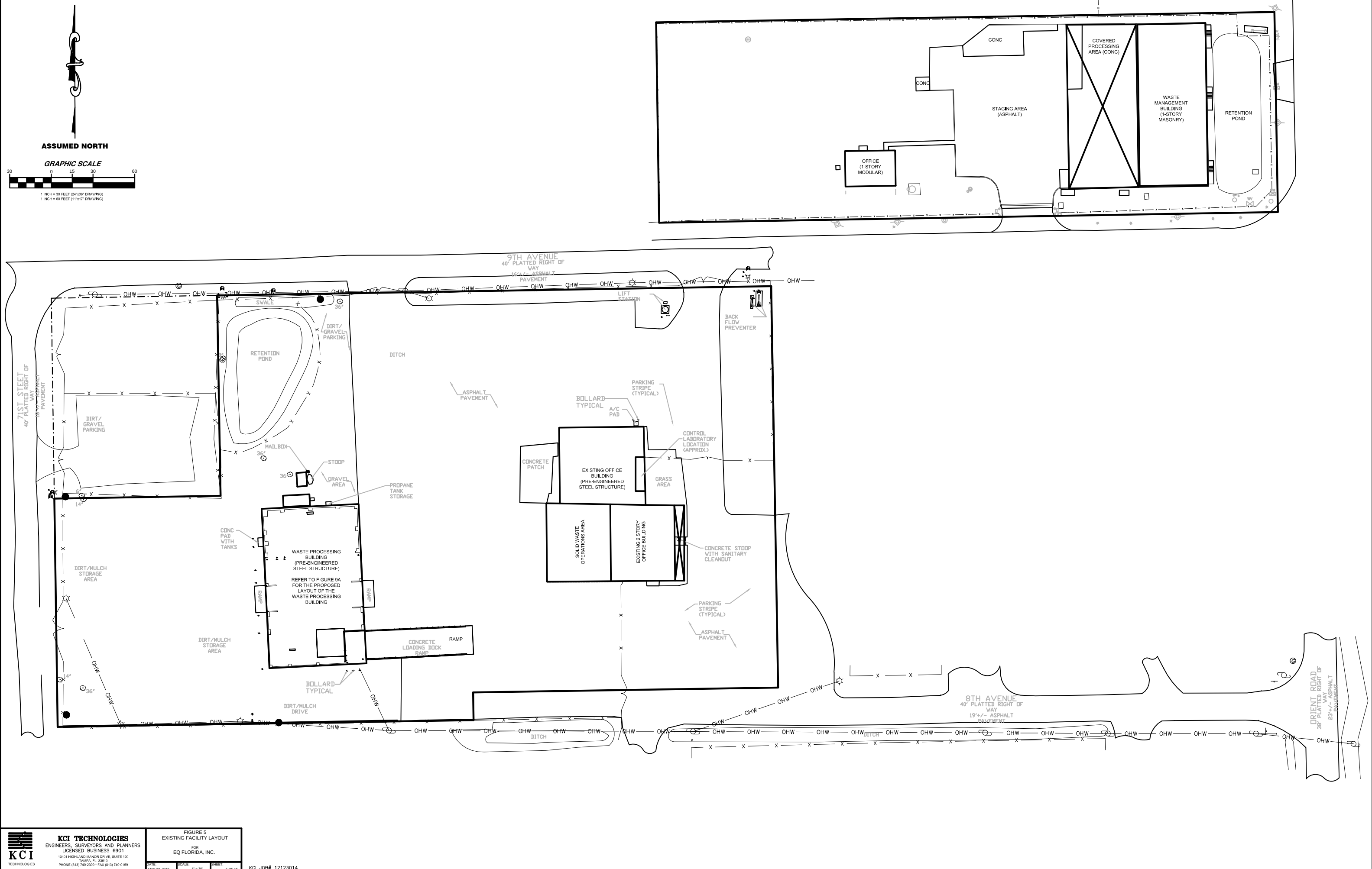
8) THE FIELD SURVEY WAS COMPLETED ON 3/12/13.

9) APPROXIMATE PROPERTY LINE INFORMATION SHOWN ON HEREON, WAS OBTAINED FROM A SURVEY PREPARED BY NORTHWEST ENGINEERING, INC. ORDER NO. 0704-039, DATED 4-18-2007 (AS PROVIDED BY THE CLIENT)

EXISTING DRAINAGE STRUCTURES	
STR#1 GRATE INLET OVERFLOW STRUCTURE TOP GRATE ELEV.=27.76' POND INLET ELEV.=26.36' PIPE "A" INVERT ELEV.= INACCESSIBLE	STR#6 GRATE INLET TOP GRATE INLET ELEV.=20.98' PIPE "D" INVERT ELEV.=19.20' PIPE "E" INVERT ELEV.=19.26'
STR#2 MANHOLE (FULL OF DEBRIS) INVERTS ARE APPROXIMATE TOP MANHOLE ELEV.=25.42' PIPE "A" INVERT ELEV.=22.87' PIPE "B" INVERT ELEV.=22.92'	STR#7 GRATE INLET TOP GRATE INLET ELEV.=20.55' PIPE "E" INVERT ELEV.=18.84' PIPE "F" INVERT ELEV.=18.80'
STR#3 GRATE INLET (FULL OF DEBRIS) INVERTS ARE APPROXIMATE TOP GRATE ELEV.=22.84' PIPE "B" INVERT ELEV.=20.71'	STR#8 GRATE INLET TOP GRATE INLET ELEV.=20.41' PIPE "F" INVERT ELEV.=18.65' PIPE "G" INVERT ELEV.=18.73' PIPE "H" INVERT ELEV.=18.81'
STR#4 GRATE INLET TOP GRATE ELEV.=21.07' PIPE "C" INVERT ELEV.=19.92' PIPE "I" INVERT ELEV.=20.18'	STR#9 GRATE INLET TOP GRATE INLET ELEV.=20.64' PIPE "G" INVERT ELEV.=18.92' PIPE "J" INVERT ELEV.=18.96'
STR#5 GRATE INLET TOP GRATE INLET ELEV.=21.30' PIPE "C" INVERT ELEV.=19.84' PIPE "D" INVERT ELEV.=19.81'	STR#10 HEADWALL TOP HEADWALL ELEV.=20.40' PIPE "H" INVERT ELEV.=18.20'
	STR#11 GRATE INLET TOP GRATE INLET ELEV.=25.12 PLASTIC PIPE INVERT ELEV.=23.97

LEGEND

	OAK TREE & SIZE
	FIRE HYDRANT
	GAS MARKER
	LIGHT POLE
	MONITORING WELL
	SIGN
	UTILITY POLE
	WATER METER
	WATER VALVE
	STORM DRAIN
	CHAIN LINK FENCE GATE
	PROPERTY LINE
	MATCH EXISTING GROUND
	CONCRETE
	ASPHALT
	BUILDING
	SET PARKER KAYLON NAIL & DISK NO. LB6901
	SET 5/8\"/>
	FOUND CAPPED IRON ROD NO. LB6901
	FOUND IRON ROD
	LICENSED BUSINESS
	BUILDING
	MORE OR LESS ELEVATION
	CONTOUR LINE AND ELEVATION



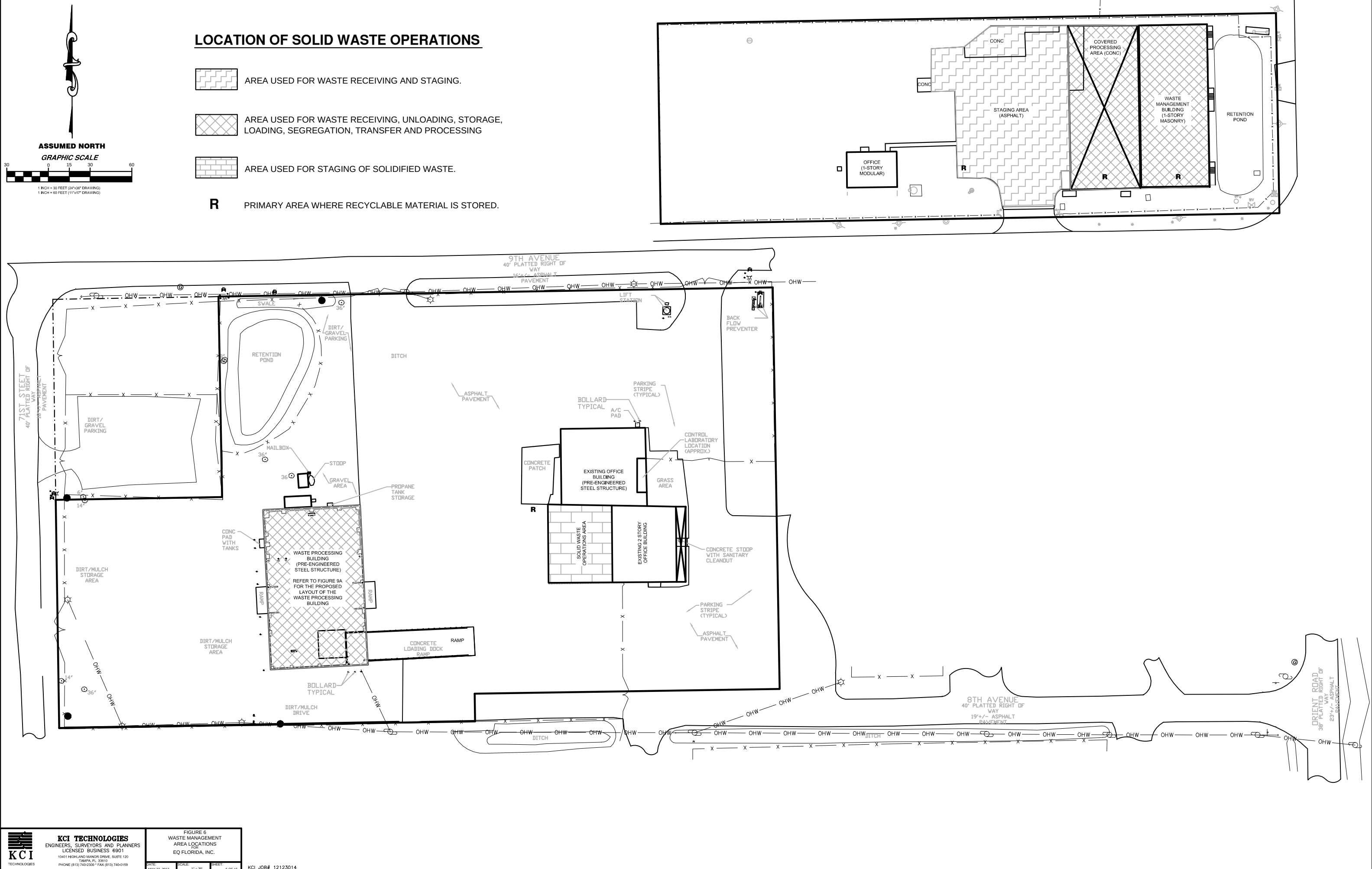
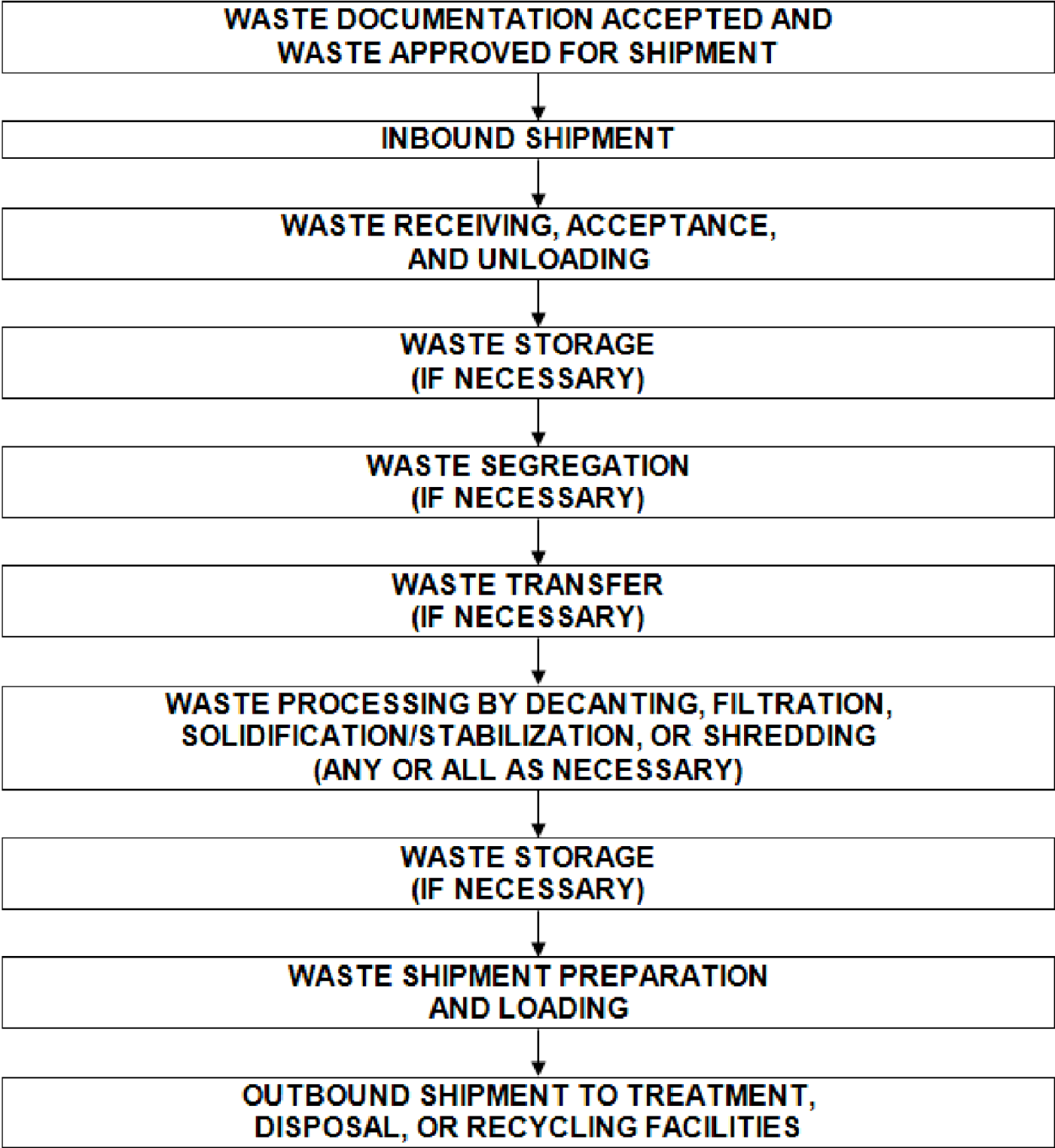
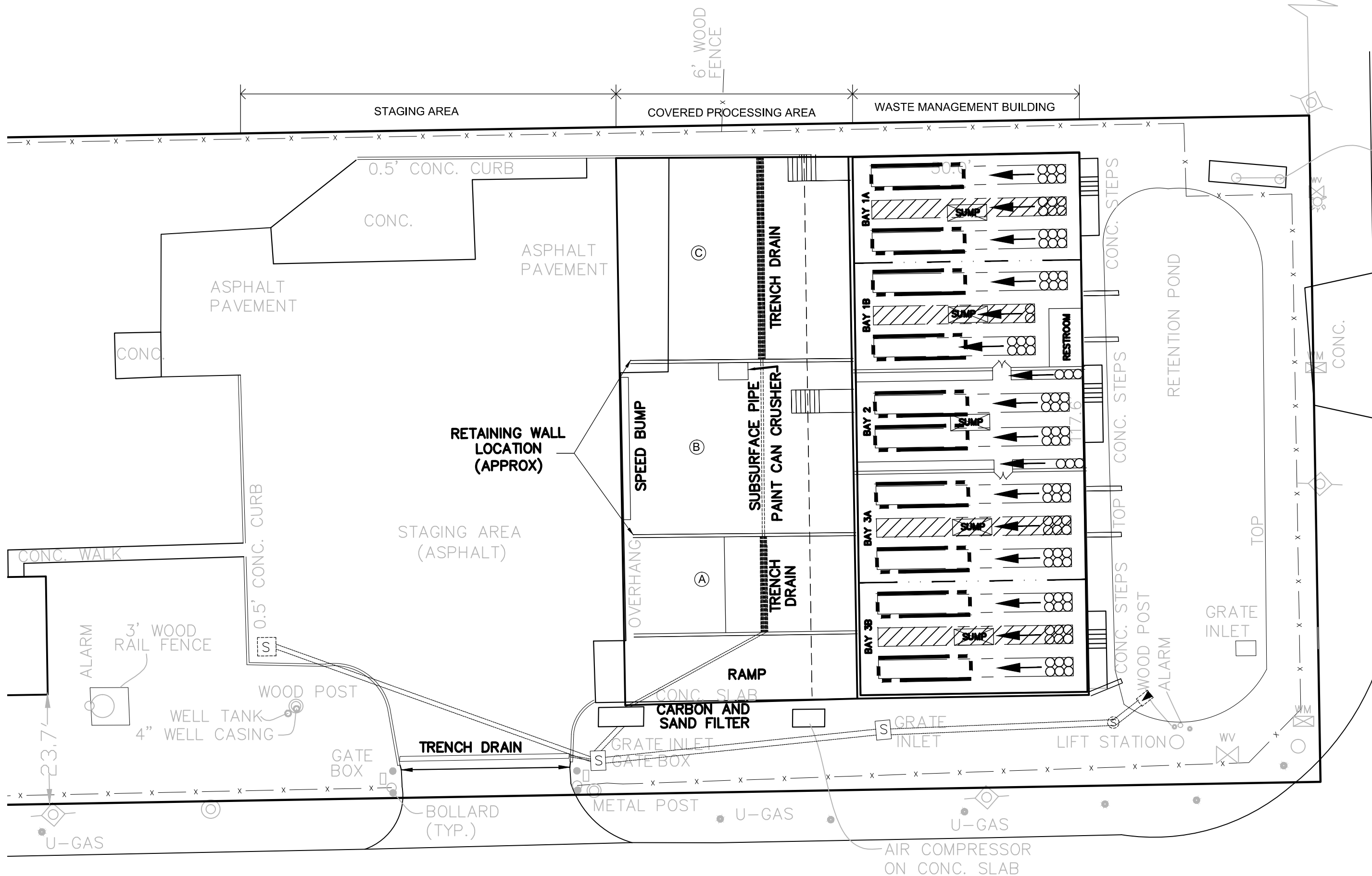
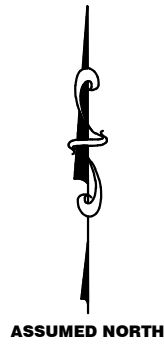


FIGURE 7
SOLID WASTE MANAGEMENT
FLOW DIAGRAM





9th AVENUE

INDICATES AREA MAY ALSO BE UTILIZED FOR TEMPORARY PROCESSING AREA.

INDICATES AREA WHERE STORAGE WILL NOT OCCUR WHEN CONTAINERS ARE DOUBLE STACKED

FENCELINE

SUMP

STORM DRAIN INLET

APPROXIMATE STORMWATER FLOW (SEE FIG. II FOR MORE DETAIL)

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FIGURE 8

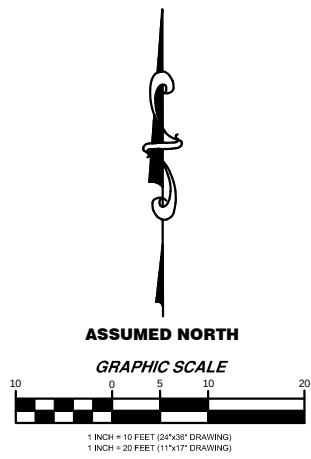
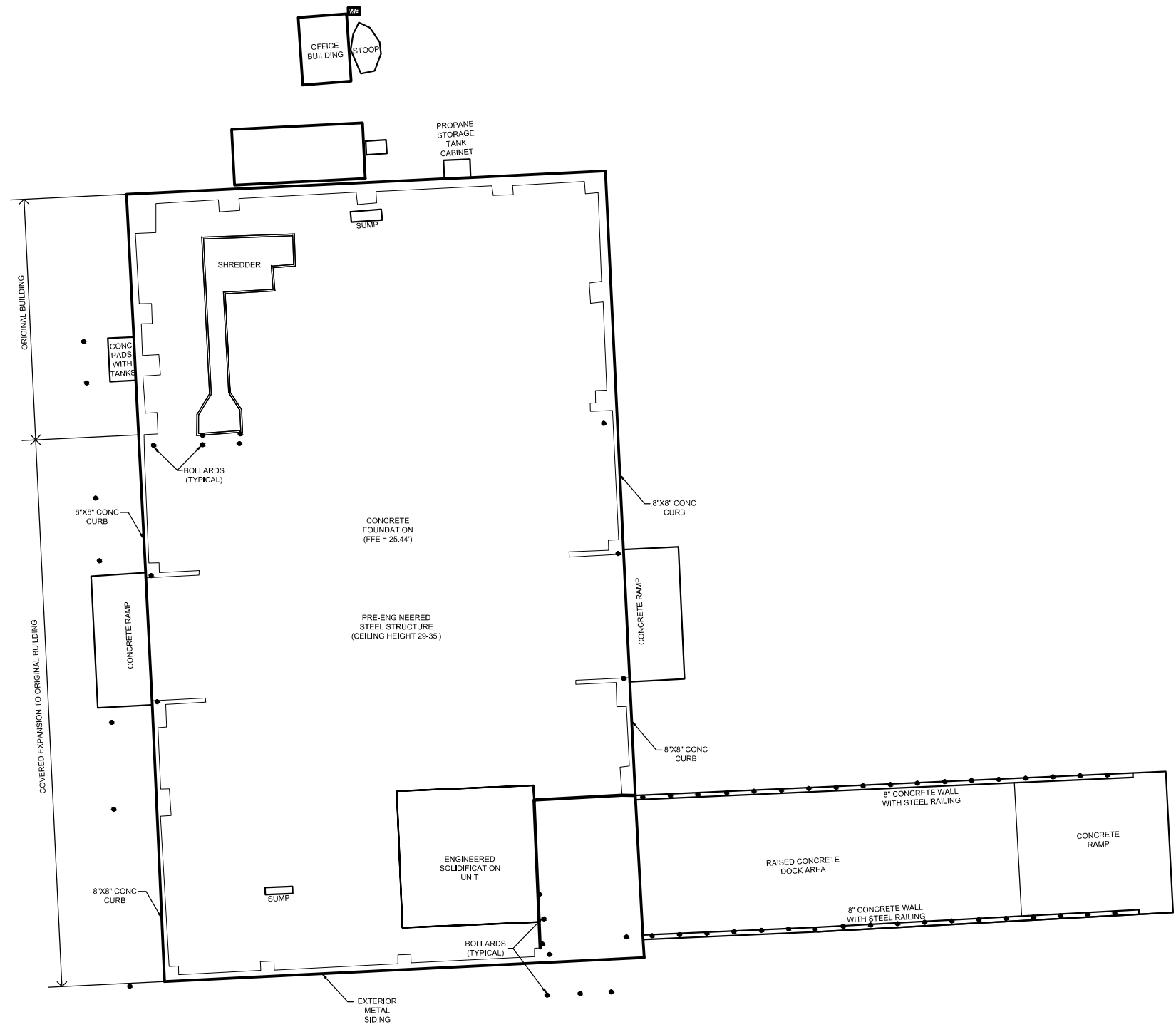
WASTE MANAGEMENT BUILDING AND COVERED PROCESSING AREA LAYOUT

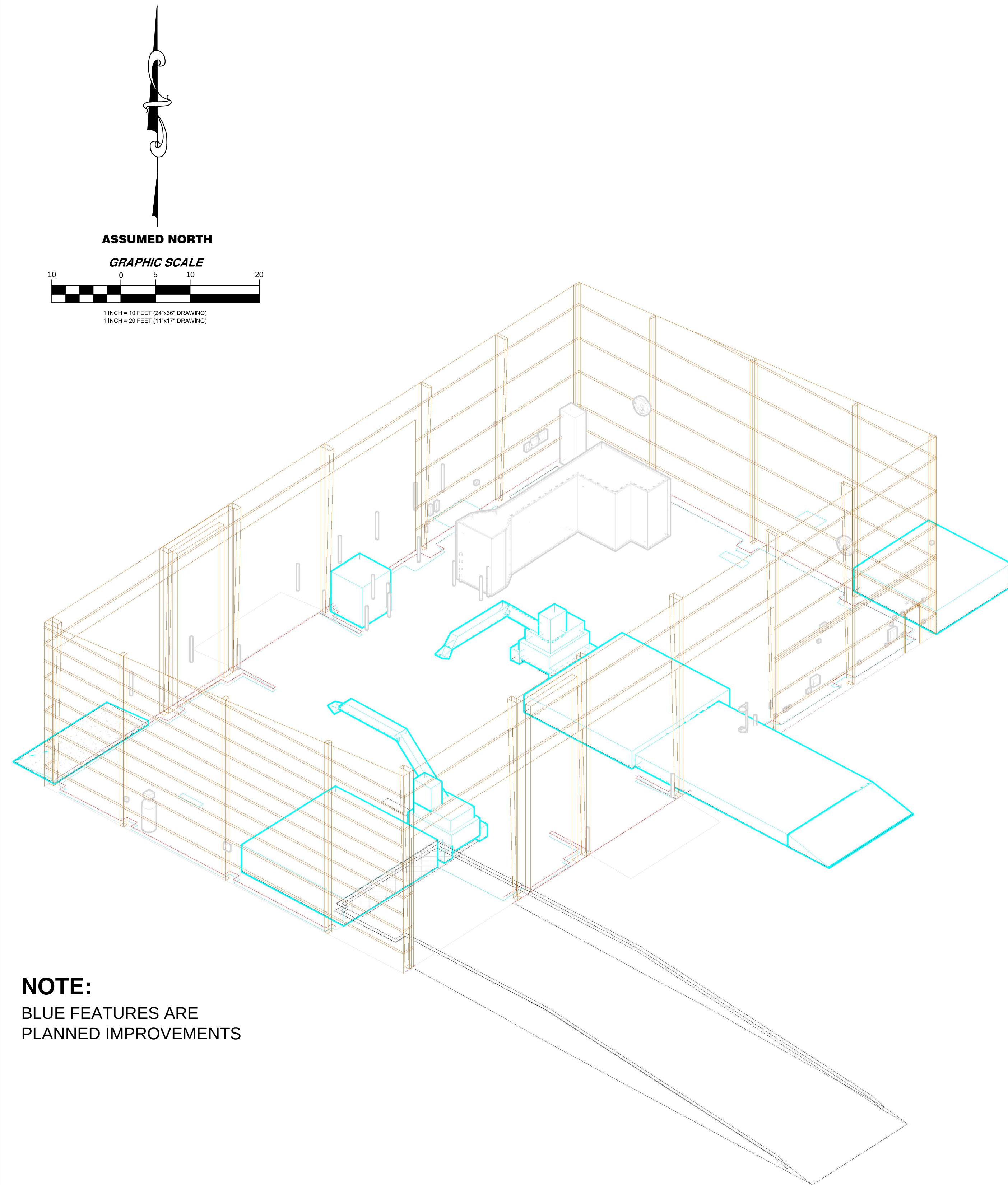
FOR

EQ FLORIDA, INC.

DATE: MAY 22, 2013

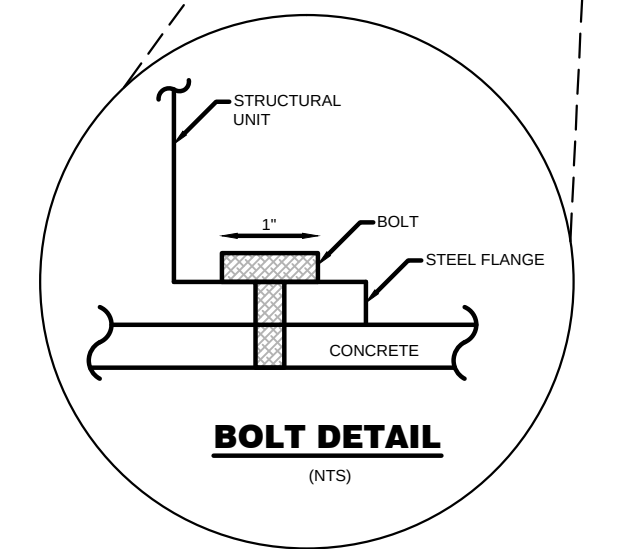
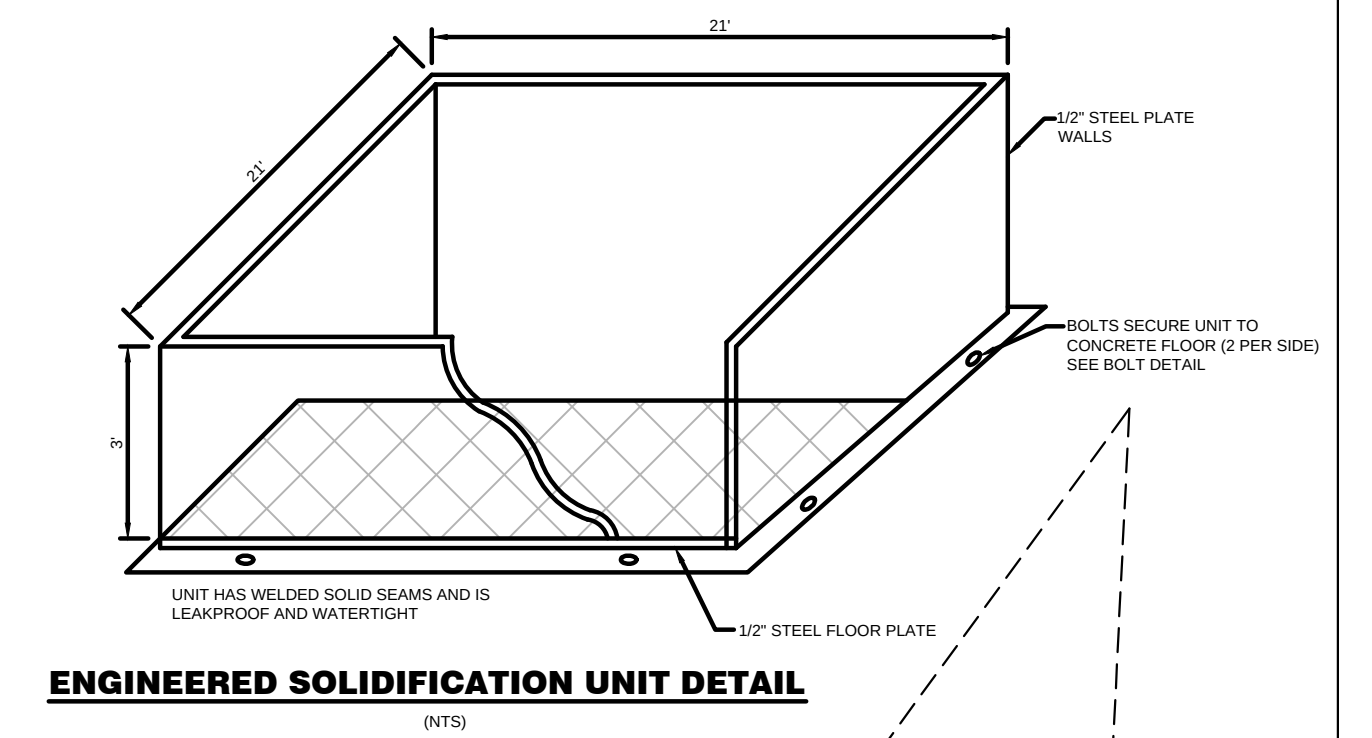
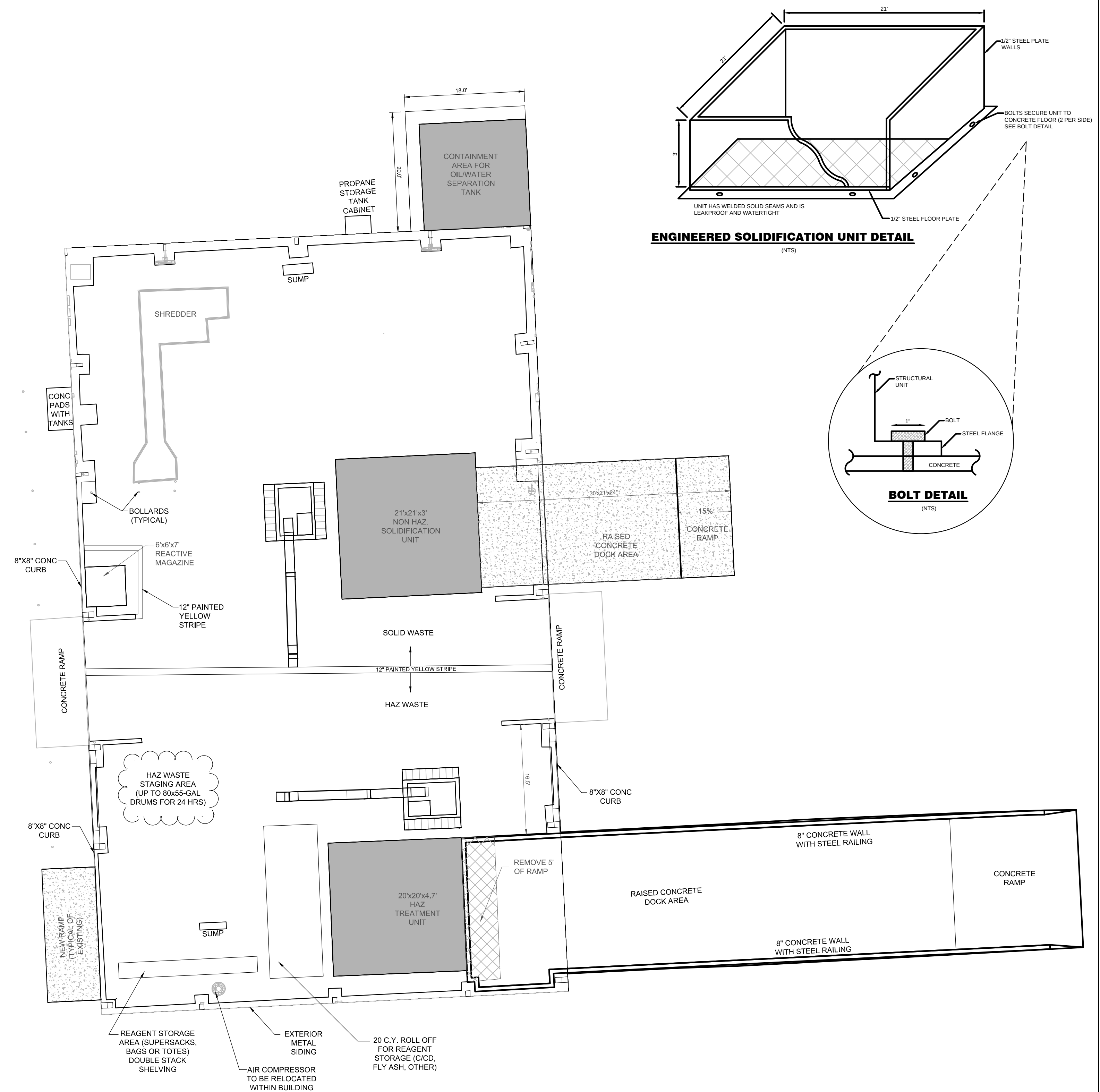
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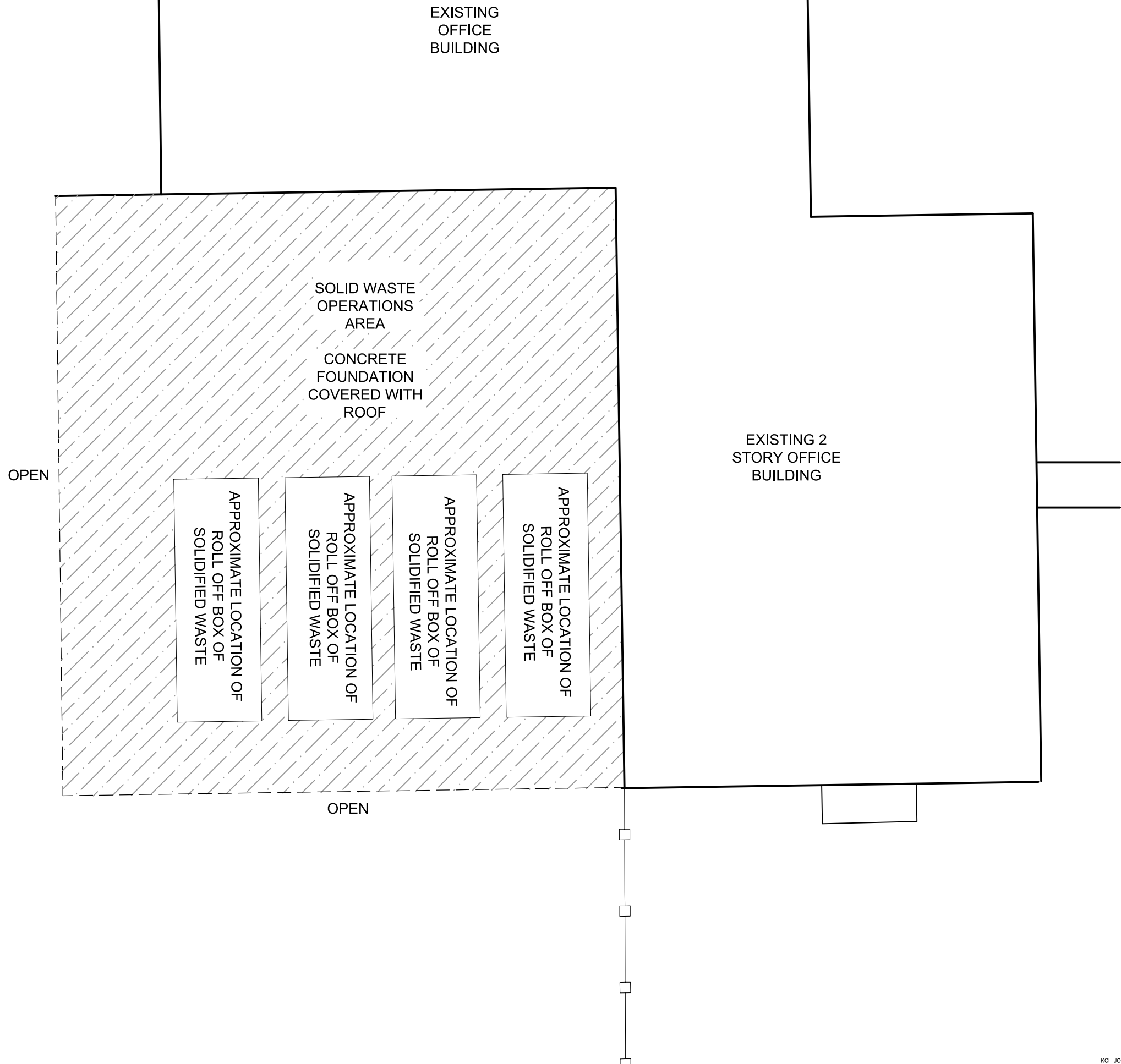
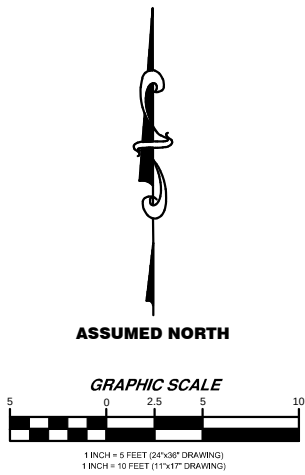


NOTE:
BLUE FEATURES ARE
PLANNED IMPROVEMENTS

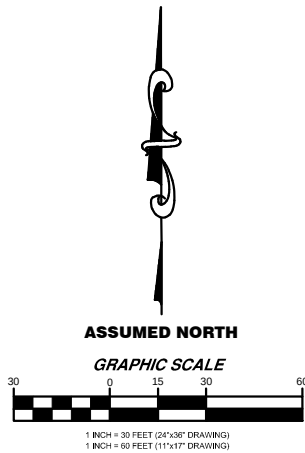
THREE DIMENSIONAL VIEW



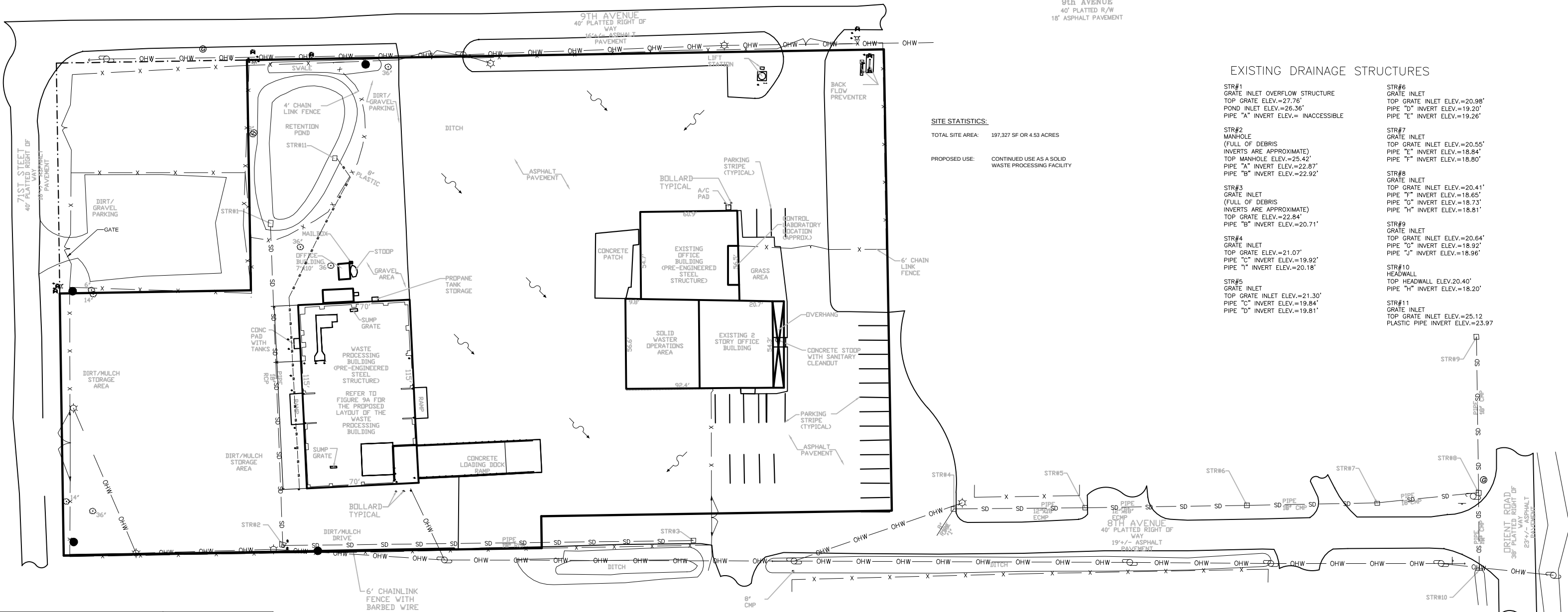
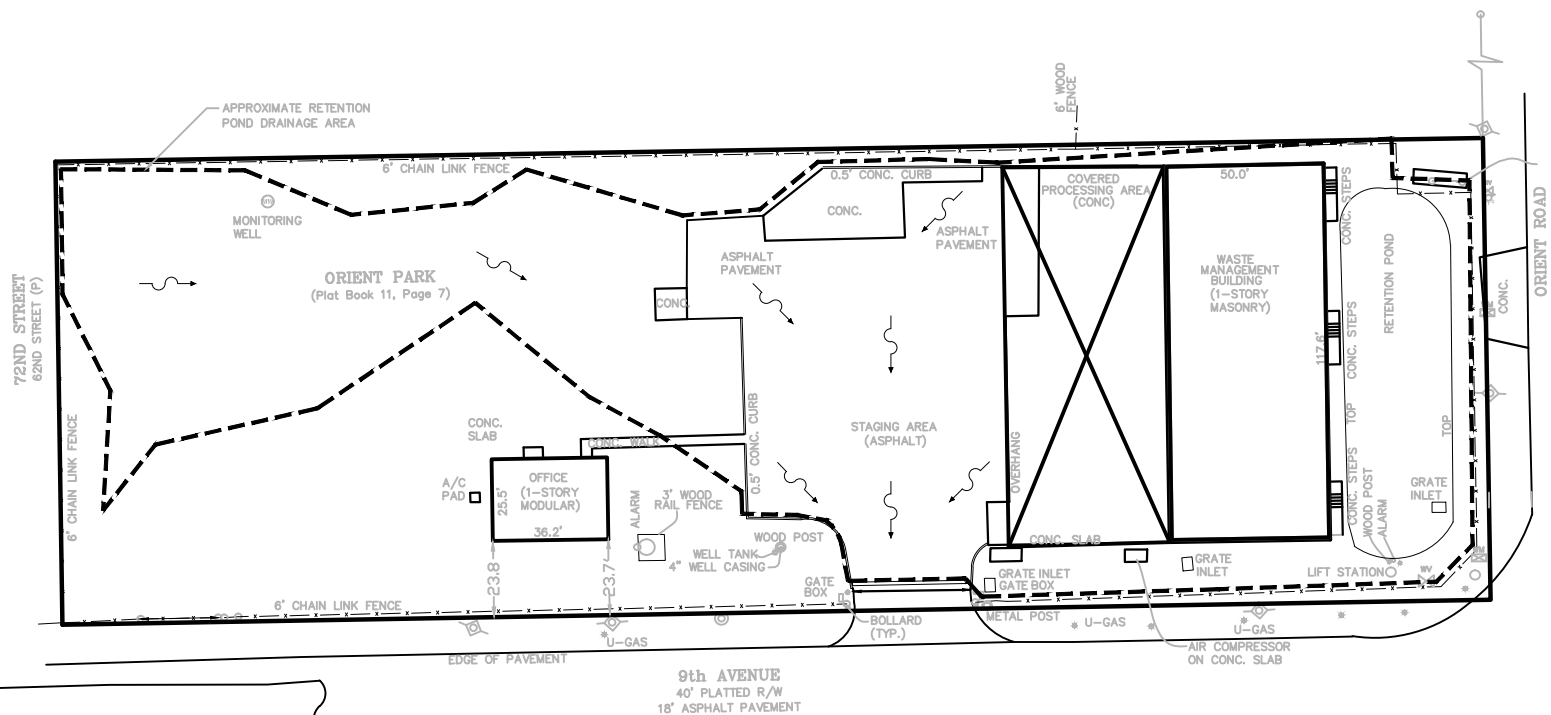
PLAN VIEW

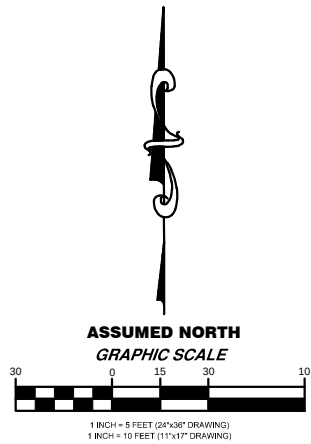


- NOTES:
- EXISTING STRUCTURE
 - FLOOR OF SOLID WASTE OPERATIONS AREA IS ESSENTIALLY LEVEL

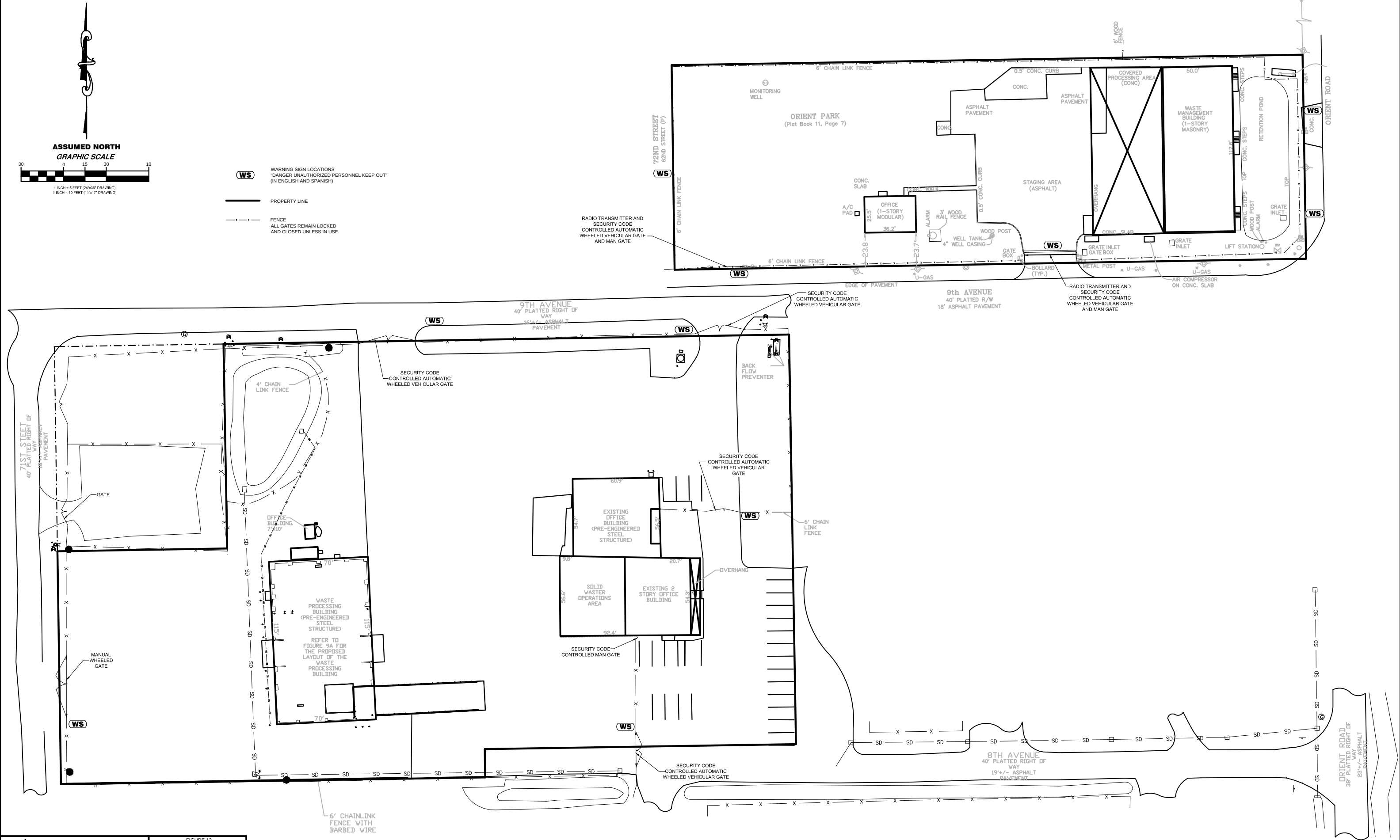


LEGEND	
	OAK TREE & SIZE
	FIRE HYDRANT
	GAS MARKER
	LIGHT POLE
	MONITORING WELL
	SIGN
	UTILITY POLE
	WATER METER
	WATER VALVE
	STORM DRAIN
	CHAINLINK FENCE
	GATE
	APPROXIMATE SURFACE
	WATER FLOW DIRECTION
	CONCRETE
	ASPHALT
	BUILDING
	PKAD
	SCR
	FOR
	FIR
	LB
	NO
	BLDG
	ELEV.
	P.L.
	MEG
	SET PARKER KAYLON NAIL & DISK NO. LB6901
	SET 5/8\"/>
	FOUND CAPPED IRON ROD NO. LB6901
	FOUND IRON ROD
	LICENSED BUSINESS NUMBER
	BUILDING
	MORE OR LESS ELEVATION
	CONTOUR LINE AND ELEVATION
	PROPERTY LINE
	MATCH EXISTING GROUND



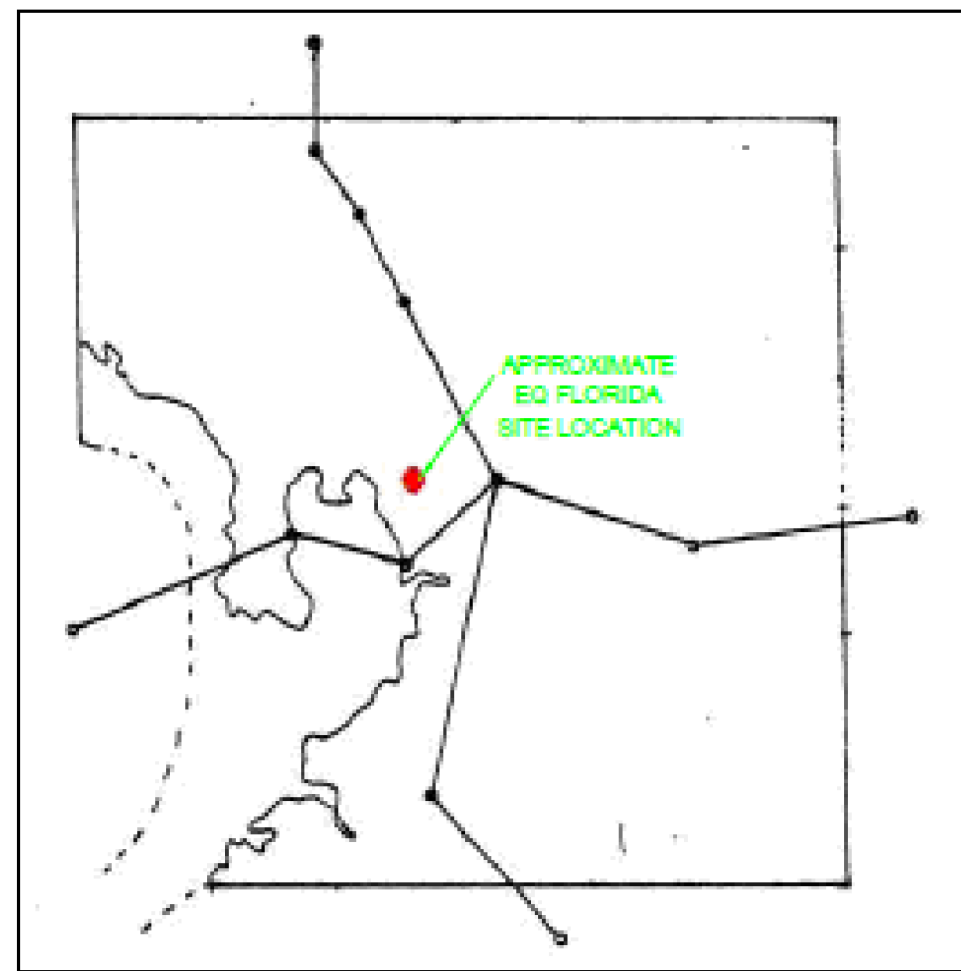
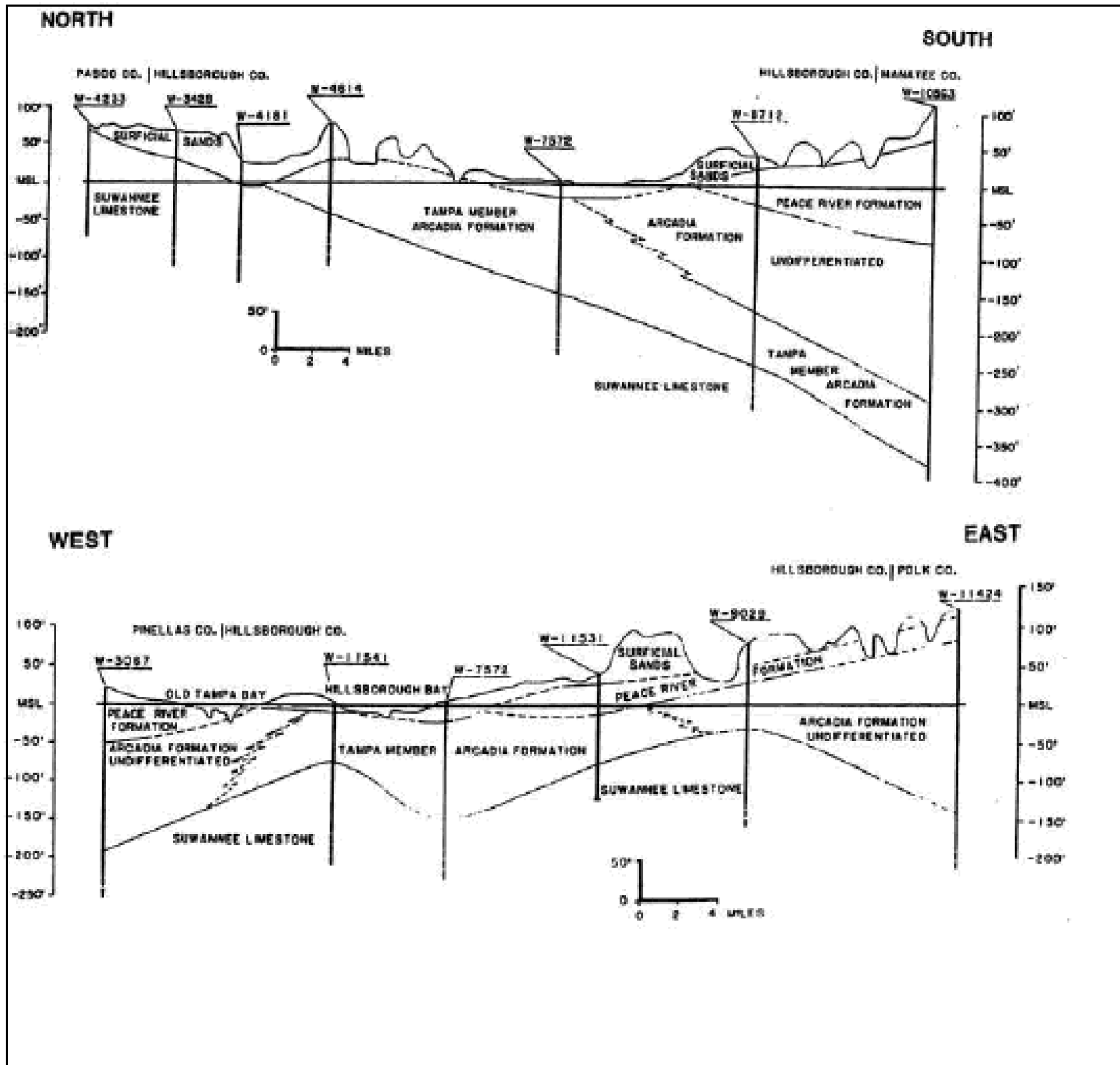


- (WS)** WARNING SIGN LOCATIONS
"DANGER UNAUTHORIZED PERSONNEL KEEP OUT"
(IN ENGLISH AND SPANISH)
- PROPERTY LINE
- - - FENCE
ALL GATES REMAIN LOCKED
AND CLOSED UNLESS IN USE.





DATE:	SCALE:	SHEET:
APRIL 17 2013	NTS	14 OF 15



CROSS SECTION LOCATION MAP
NOT TO SCALE



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FIGURE 14
GEOLOGIC CROSS SECTION
FOR
EQ FLORIDA, INC.

DATE: MAY 22, 2013 SCALE: NTS SHEET: 15 OF 15

APPENDIX A

REGULATORY CROSS-REFERENCE

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.320	
Application content and format. Applications for permits to construct, operate, modify, or close a solid waste management facility shall include in the following sequence:	-(7)	
A letter of application transmittal;	-(7)(a)	Attached
A completed application form dated and signed by the applicant;	-(7)(b)	Attached
The permit fee specified in Rule 62-701.315, F.A.C., in check or money order, payable to the Department.	-(7)(c)	Attached
An engineering report addressing the requirements of this rule which shall:	-(7)(d)	
Contain a cover sheet stating the project title, location, applicant's name, and the engineer's name, address, signature, date of signature and seal	-(7)(d)1	Report Cover
Have the text printed on 8 1/2 inch by 11 inch consecutively numbered pages;	-(7)(d)2	Report Body
Contain a table of contents or index describing the body of the report and the appendices;	-(7)(d)3	Table of Contents
Include the body of the report and all appendices.	-(7)(d)4	
Appendices submitted as part of an engineering report to support a permit application shall contain, where required under applicable sections of this rule:	-(7)(e)	
An operation plan and closure plan appropriate for the type of facility;	-(7)(e)1	Appendix C & Appendix E
A contingency plan appropriate for the type of facility to cover operations interruptions and emergencies such as fires, explosions, or natural disasters;	-(7)(e)2	Appendix D
Illustrative charts and graphs;	-(7)(e)3	Figures
Records or logs of tests, soil borings, hydrogeological information, geochemical surveys, and water quality analyses; and	-(7)(e)4	N/A
Engineering calculations, including literature citations.	-(7)(e)5	Appendix B
Plans or drawings for all solid waste management facilities shall:	-(7)(f)	
Use sheets 22 inches by 34 inches or 24 inches by 36 inches, and include title blocks;	-(7)(f)1	
Have a cover sheet that includes the project title, applicant's name, sheet index, legend of symbols, and the engineer's name, address, signature, date of signature and seal;	-(7)(f)2	Report Cover
Include a regional map or plan showing the project location;	-(7)(f)3	Figure 1
Include a current vicinity map, or aerial photograph taken within one year preceding the application;	-(7)(f)4	Figure 2 & Figure 3
Have a site plan containing the location of all property boundaries certified by a registered Florida land surveyor; and	-(7)(f)5	Figure 4
Clearly show all necessary details and be numbered, titled, and referenced to the narrative report. Drawings shall contain a north arrow and horizontal and vertical scales, and shall specify drafting or origination dates. All elevations shall be referenced to National Geodetic Vertical Datum.	-(7)(f)6	All Figures

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.320	
Documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a solid waste management facility; and	-(7)(g)	Appendix I
For facilities owned or operated by a county, a description of the existing or proposed recycling facilities or activities, if any, at the site and a description of whether, and the extent to which, these recycling facilities or activities will contribute to the county's achievement of the waste reduction and recycling goals contained in Section 403.706, F.S.	-(7)(h)	N/A
For purposes of the evaluation required in subsection (3) of this section, a history and description of any enforcement actions described in subsection (3) of this section relating to solid waste management facilities in this state.	-(7)(i)	Appendix G
Notice of application	-(8)	Appendix F
Airport Safety	-(13)	Section 12.2
Emergency preparedness and response	-(16)	
Every permitted solid waste management facility shall have, as part of its operation plan, a contingency plan appropriate for the type of facility to cover operational interruptions and emergencies such as fires, explosions, or natural disasters. The contingency plan shall be kept at the facility at all times and shall be accessible to facility operators. The contingency plan shall include:	-(16)(a)	Appendix D
Designation of persons responsible for implementation of the contingency plan;	-(16)(a)1	Appendix D, Page 5
Procedures for notification of appropriate emergency response persons, including the department, the local government, and local fire protection agencies;	-(16)(a)2	Appendix D, Page 8
A description of emergency procedures to be followed, including the location of fire-fighting equipment and explanations of how to use this equipment;	-(16)(a)3	Appendix D, Page 12 & 14
Provisions for the immediate shutting down of those parts of the facility affected by the emergency and notification to customers of the closure of the facility; and	-(16)(a)4	Appendix D, Page 14
Procedures for notification of neighbors and local government officials of the potential impacts of the emergency, and provisions to minimize those impacts.	-(16)(a)5	Appendix D, Page 8
Requirement	FAC Reference	Document Section
	62-701-300	
Prohibitions	All	Appendix J

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.710	
Application. A permit application for a waste processing facility shall be submitted on Form 62-701.900(4), Application to Construct, Operate, or Modify a Waste Processing Facility, effective date August, 2012. The form shall indicate whether the facility will operate as a materials recovery facility, transfer station, some other type of processing facility, or some combination thereof, and shall be signed and sealed by a professional engineer. Subsections 62-701.320(5), (6), and paragraph (8)(a), F.A.C., apply to such applications. The application must meet the requirements of subsection 62-701.320(7), F.A.C., except for paragraphs (e) and (h) and subparagraphs (7)(f)4. and 5., and must also include the following:	-(2)	Section 1.0
A description of the operation of the facility including: 1) The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed; 2) The expected daily average and maximum weights or volumes of materials to be managed or processed; 3) How the materials will be managed or processed; 4) How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas; 5) The types of equipment that will be used; 6) The maximum time materials will be stored at the facility; 7) The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and 8) The expected disposition of materials after leaving the facility.	-(2)(a)1-8	Sections 4.0 & 5.0
A site plan, of a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site and potable water wells on or within 500 feet of the site;	-(2)(b)	Figure 3
A boundary survey and legal description of the property;	-(2)(c)	Figure 4
A construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C.;	-(2)(d)	Figure 9A
An operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C., and the recordkeeping requirements of subsection 62-701.710(8), F.A.C.;	-(2)(e)	Section 5.4 & Appendix C
A closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C.;	-(2)(f)	Appendix E
A contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. and	-(2)(g)	Appendix D
The financial assurance documentation required by subsection 62-701.710(7), F.A.C.	-(2)(h)	Section 10.0

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.710	
Design requirements. Minimum design requirements for waste processing facilities are as follows:	-(3)	
Tipping, processing, sorting, storage and compaction areas that are not enclosed shall be equipped with litter control devices.	-(3)(a)	Section 6.1
The facility shall be designed with a leachate control system to prevent discharge of leachate and avoid mixing of leachate with stormwater, and to minimize the presence of standing water.	-(3)(b)	Sections 6.2 & 7.0
Provisions shall be made for evaluating the quantity of all incoming solid waste and recovered materials. Storage areas shall be designed to hold the expected volume of materials until they are transferred for disposal or recycling.	-(3)(c)	Sections 5.2.2 & 6.2
Operational requirements.	-(4)	
All operations shall be conducted in accordance with the approved Operation Plan. The Department shall be notified before any substantial changes or revisions to the approved Operation Plan are implemented in order to determine whether a permit modification is required.	-(4)(a)	Appendix C
Stored putrescible wastes shall not be allowed to remain unprocessed for more than 48 hours; however, if the operation plan includes provisions to control vectors and odors, putrescible wastes may be stored for up to seven days. Any other unauthorized waste received by the facility shall be segregated and transported to an authorized disposal or recycling facility within 30 days of receipt.	-(4)(b)	Appendix C
Operators and spotters shall be trained in accordance with Rule 62-701.320(15), F.A.C.	-(4)(c)	Appendix C
A trained operator shall be on duty whenever the facility is operating. Operating hours shall be posted at the facility.	-(4)(c)1	Appendix C
At least one trained spotter shall be on duty at all times that waste is received at the site to inspect the incoming waste. All incoming waste shall be inspected, and any unauthorized waste shall be removed from the waste stream and placed into appropriate containers for disposal at a permitted facility in accordance with a schedule submitted as part of the operation plan.	-(4)(c)2	Appendix C & Appendix H
The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C.	-(4)(d)	Appendix C
Adequate fire protection shall be available at all times.	-(4)(e)	Appendix C & Appendix D
Access to the facility shall be controlled during the design period of the facility by fencing or other effective barriers to prevent disposal of unauthorized solid waste.	-(4)(f)	Appendix C & Appendix D
All drains and leachate conveyances shall be maintained so that leachate flow is not impeded.	-(4)(g)	Sections 6.2 & 7.0

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.710	
If any regulated hazardous wastes are discovered to be improperly deposited at the facility, the facility operator shall promptly notify the Department, the person responsible for shipping the wastes to the facility, and the generator of the wastes, if known. The area where the wastes are deposited shall immediately be cordoned off from public access. If the generator or hauler cannot be identified, the facility operator shall assure the cleanup, transportation, and disposal of the waste at a permitted hazardous waste management facility.	-(4)(h)	Appendix C & Appendix H
If the facility has reached its permitted capacity for storage of wastes or recyclable materials, the permittee shall not accept additional waste for processing until sufficient capacity has been restored.	-(4)(i)	Section 6.2 & Appendix C
Certification. Certification of construction completion shall be done in accordance with paragraph 62-701.320(9)(b), F.A.C. Record drawings of relevant construction details shall be submitted along with the certification.	-(5)	Provided Upon Construction Completion
Closure requirements.	-(6)	
The owner or operator shall notify the Department in writing prior to ceasing operations, and shall specify a closing date. No waste shall be received by the facility after the closing date.	-(6)(a)	Appendix E
Within 30 days after receiving the final solid waste shipment, the owner or operator shall remove or otherwise dispose of all solid waste or residue in accordance with the approved closure plan. Stored putrescible wastes shall continue to be managed in accordance with paragraph 62-701.710(4)(b), F.A.C.	-(6)(b)	Appendix E
Closure must be completed within 180 days after receiving the final solid waste shipment. Closure will include removal of all recovered materials from the site, as well as performing any contamination evaluation required by subparagraph 62-701.710(1)(d)2., F.A.C. The owner or operator shall certify in writing to the Department when closure is complete.	-(6)(c)	Appendix E

Regulatory Cross-Reference

Requirement	FAC Reference	Document Section
	62-701.710	
Financial assurance.	-(7)	
The owner or operator of a waste processing facility shall provide the Department with proof of financial assurance issued in favor of the State of Florida in the amount of the closing cost estimates for the facility. The closing cost estimates shall be submitted to the Department as part of the permit application for the facility. Proof of financial assurance shall be submitted at least 60 days prior to the initial receipt of waste at the facility. Proof of financial assurance shall consist of one or more of the following financial instruments which comply with the requirements of subsection 62-701.630(6), F.A.C.: trust fund; surety bond guaranteeing payment; surety bond guaranteeing performance; irrevocable letter of credit; insurance; and financial test and corporate guarantee. If the owner or operator of the facility is a local government, an escrow account which complies with the requirements of subsection 62-701.630(5), F.A.C., may be used to provide proof of financial assurance. Financial documents shall be submitted on Form 62-701.900(5)(a), (b), (c), (d), (e), (f), (g), or (h), as appropriate.	-(7)(a)	Section 10.0
Closure cost estimates and annual updates thereof shall comply with the provisions of subsections 62-701.630(3) and (4), F.A.C., except that long-term care costs need not be included, and the costs shall be based upon compliance with this section.	-(7)(b)	Appendix E
If a local government requires financial assurance for closure, which is at least as stringent as that required by this rule, the Department will attempt to establish a cooperative mechanism with the local government and thereby avoid duplicative financial requirements.	-(7)(c)	NA
Recordkeeping.	-(8)	
Operational records shall be maintained to include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records shall include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years.	-(8)(a)	Section 5.4
The owner or operator of any facility which recycles construction and demolition debris shall submit an annual report to the Department on Form 62-701.900(7), Annual Report for a Construction and Demolition Debris Facility, effective date January 6, 2010. This report shall include a summary of the amounts and types of wastes disposed of or recycled. The county of origin of materials which are recycled, or a statement that the county of origin is unknown, shall be included in the report. The report shall be submitted no later than February 1 of each year, and shall cover the preceding calendar year.	-(8)(b)	Section 5.4

APPENDIX B

WASTE STORAGE AND CONTAINMENT CALCULATIONS

WASTE STORAGE AND CONTAINMENT CALCULATIONS

STRUCTURE		CONTAINMENT					STORAGE	STAGING	STORE/STAGE	ACTIVITIES																		
Sub-Structure ⁽³⁾		Length (Ft.)	Width (Ft.)	Depth (Ft.)	Total Containment		Total Storage (Gal)	Total Staging (Gal)	Largest Single Container	Receiving	Unloading	Loading	Storage	Staging	Transfer	Processing	Segregation											
					(Cu. Ft.)	(Gal.)																						
		A	B	C	D=AxBxC	E=Dx7.4805																						
WASTE MANAGEMENT BUILDING										X	X	X	X		X	X	X											
	Waste Management Building Sump #1	8.5	3.5	4.5	133.9	1001.5			Tank 500-gal																			
	Waste Management Building Sump #2	8.5	3.5	4.5	133.9	1001.5																						
	Waste Management Building Sump #3	8.5	3.5	4.5	133.9	1001.5																						
	Waste Management Building Sump #4	8.5	3.5	4.5	133.9	1001.5																						
	Waste Management Building Sump #5	8.5	3.5	4.5	133.9	1001.5																						
	Waste Management Building Total ⁽⁴⁾		-	-	-	669.4	5,007.3	50,000																				
COVERED PROCESSING AREA										X	X	X	X		X	X	X											
	Area A-West of Trench (pool does not extend to canopy) (sloped area) (total depth 0.25 ft)	20	20	0.125	50.0	374.0																						
	Area A-East of Trench (total depth 0.25 ft)	20	20	0.25	100.0	748.1																						
	Area B-West of Trench (pool does not extend beyond canopy) (sloped area) (total depth 0.79 ft)	26	38.4	0.395	394.4	2950.1																						
	Area B-East of Trench (total depth 0.79 ft)	20	38.4	0.79	606.7	4538.6																						
	Area C-West of Trench (pool extends 15 ft beyond canopy) (sloped area) (total depth 0.79 ft)	41	45	0.395	728.8	5451.6																						
	Area C-East of Trench (total depth 0.79 ft)	20	45	0.79	711.0	5318.6																						
	Trench	64.8	1.6	0.4	41.5	310.2																						
	6 Inch Pipe	38.4	$\pi \times 0.25^2$		7.5	56.4																						
	Sump	8	4.3	5.1	175.4	1312.4																						
	Covered Processing Area Total ⁽⁴⁾⁽⁵⁾		-	-	-	-	21,060.0	50,000		25-CY Roll Off Box 5050-gal																		
STAGING AREA										X				X														
	No specific structural containment.								25-CY Roll Off Box 5050-gal																			
	Leachate production prevented by operational practices.																											
	Staging Area Total		-	-	-	0.0	0.0	35,200																				
WASTE PROCESSING BUILDING (Includes original building & 2010 expansion)										X	X	X	X		X	X	X											
	Area Storage: 30x25 CY Roll-Off Boxes @ 5050 gallons/Roll-Off Box						151,500																					
	80x55 Gallon Haz Waste Drums (80 x 55)						4,400																					
	ESU Unit - Non-Haz ((21 x 21 x 3) x 7.4805)						9,897																					
	ESU Unit - Haz ((20 x 20 x 4.7) x 7.4805)						14,063																					
	Subtracting Reagent Storage Roll-off ((23.5 x 8 x 4.5) x 7.4805)						6,329																					
	2,450 Sq. Ft. Original Waste Processing Building ⁽¹⁾	31.66667	68.3333	0.5833	1262.3	9442.4																						
	5,600 Sq. Ft. Building Expansion ⁽²⁾	78.66667	69.3333	0.5833	3181.6	23800.2																						
	Sump in original building				6.7	50.0																						
	Sump in building expansion area	1	4	2	8.0	59.8																						
	Subtracting the Non-Hazardous ESU Footprint	21	21	0.5833	257.3	1924.4																						
	Subtracting the Hazardous ESU Footprint	20	20	0.5833	233.3	1745.5																						
	Subtracting the Reagent Storage Roll-off Footprint	23.5	8	0.5833	109.7	820.4																						
	Subtracting the Shredder Footprint	3	9.5	0.5833	16.6	124.4																						
	Subtracting the Shredder Motor Controller Footprint	2.16	2.66	0.5833	3.4	25.1																						
	Subtracting the Elevated Dock Area Footprint	8	20	0.5833	93.3	698.2																						
	Waste Processing Building Total					3,745.0												28,014.6	173,532		Haz ESU 14,063-gal							
	SOLID WASTE OPERATIONS AREA																								X			
		No specific structural containment. Only solidified wastes are stored in this area. Area is covered to prevent stormwater contact.																		25-CY Roll Off Box 5050-gal								
		Proposed Additional Solid Waste Operations Area Total																										
MAXIMUM VOLUME OF WASTE ON-SITE AT ANY ONE TIME							278,932																					

- (1) Building dimensions are 35 feet by 70 feet less 20 inches of curb on three sides. Does not account for space occupied by building footers.
- (2) Building dimensions are 80 feet by 70 feet less 8 inches of curb on three sides. Does not account for space occupied by building footers or roll over ramps.
- (3) Storage capacity for all areas is determined based on physical structural dimensions and capacity to hold waste containers, except as noted in Footnote 4.
- (4) Total storage capacity of Waste Management Building and Covered Processing Area is limited to 50,000 gallons by Hazardous Waste Permit.
- (5) The following applies to the contanment calculations for the Covered Processing Area:

- Spill containment is evaluated by calculatging the available volume at a constant elevation of the top of the pool. The elevation is set at the top of the curbing at the entrance to Area B.

- Volumes west of the trench drain are calculated based on 1/2 of the total depth to account for the sloped surfaces.

APPENDIX C

OPERATION PLAN

OPERATION PLAN

This Operations Plan has been prepared for the EQ Florida, Inc. (EQFL) facility located in Tampa, Florida as required by 62-701.710, F.A.C. It includes information on facility operations, staff responsibilities, standard operating procedures, startup and shut down procedures, inspections, training, safety, and fire and security control methods.

Operations Summary

Solid waste management operations conducted at EQFL include processing, staging, storage and management of non-RCRA regulated solid wastes. Processing includes segregation, decanting, filtration, transfer, shredding, or solidification. No on-site disposal will occur. All wastes managed will be sent off-site to other facilities for ultimate disposal or recycling.

Wastes will be received and stored in closed containers such as the manufacturer's original container, 5-gallon pails with lids, 55-gallon drums, one-ton bags and boxes, tote tanks, dump trailers, roll-off boxes, or tankers. Wastes may be separated or consolidated. The primary goal of all on-site processing is to configure wastes for efficient off-site shipment and/or disposal. Recyclable materials such as scrap metals, used oils, and lead-acid batteries will be separated, segregated and/or consolidated for shipment to an off-site recycling facility.

Hours of Operation

Normal facility operations occur between 6:00 a.m. and 11:00 p.m. The facility may operate up to three shifts (24 hours) daily (including Saturday and Sunday) if it is necessary to process the waste within desired periods. Operations occurring during non-daylight hours will only take place where sufficient electrical lighting is provided. Operating hours shall be posted at the facility.

Staffing

The EQFL General Manager reports directly to the Vice President of EQ located in Wayne, Michigan. The General Manager has authority for EQFL operations. Line managers, including the General Manager, report to the EQFL General Manager, and direct and manage all operations (hazardous and non-hazardous) at the EQFL facility. The EQFL Environmental, Health and Safety Manager directs and manages all environmental, health and safety compliance, regulatory, and permitting activities. EQFL also employs supervisors, chemists, technicians, and drivers at the facility.

Operating Procedures

Operations conducted at EQFL consist of shipping and receiving wastes, moving wastes, transferring wastes, storing containers of waste, and processing waste. Equipment used to perform these activities includes transportation vehicles and equipment (trucks, tankers, etc.), storage containers (drums, totes, roll-offs, etc.), material handling equipment (forklifts, backhoes/loaders, pumps, etc.), and processing equipment (filters, an industrial shredder, and solidification units).

Site-specific Standard Operating Procedures (SOPs) have not been prepared for the transportation vehicles and equipment, storage containers, or material handling equipment as these are industry standard equipment that will be used and operated in accordance with generally accepted practices, and where applicable, manufacture's recommendations and appropriate regulatory standards.

SOPs have been prepared for the shredder and solidification units at the facility as these items are more unique to this facility. The current versions of these SOPs are attached at the end of this Operations Plan.

Procedures for Start-up Operations, and Scheduled and Unscheduled Shutdown of Operations

All operations and processing at the EQFL facility are conducted on a batch basis. There are no continuous operations utilized for solid waste management. All operations and processes require a startup and shutdown.

Waste receiving, storage, and shipping require no special startup or shutdown procedures. Solid waste processing consisting of segregating, decanting, and filtering involve no specific startup or shutdown procedures. Specific startup and shutdown procedures have been established for waste processing activities consisting of shredding and solidification and are contained in the SOPs that are attached at the end of this Operations Plan.

Inspections

Each waste shipment, upon arrival at the facility, will be inspected, sampled and analyzed as set forth in the Waste Analysis Plan. EQFL personnel must classify the waste as being "off-specification" if it is significantly different in waste type from the information shown in the waste profile, the pre-acceptance evaluation, or on the manifest. Wastes found to be in non-conformance may be rejected. They may be re-evaluated for possible acceptance by the facility despite the non-conformance or they may be shipped to an alternate off-site facility if the proper treatment method is available at that location.

Training

All EQFL operations personnel involved in any waste handling, transportation, emergency response, storage or treatment operations will successfully complete a program of training that teaches them to perform their duties in a safe manner that ensures the facility compliance with the requirements of 40 CFR Part 264.16.

A trained Operator will be on duty whenever the facility is operating. All EQFL personnel that fulfill the duties of an Operator shall be trained in accordance with Rule 62-701.320(15)(b)2., F.A.C., in that they shall complete 16 hours of initial training, and shall pass an examination as part of that training. Within three years after passing the examination, and every three years thereafter, operators shall complete an additional 8 hours of continued training.

In this context an "Operator" means any person who is in charge of the actual operation, supervision, and maintenance of the facility and includes the on-site person in charge of a shift or period of operation during any part of the day.

Training documentation will be kept at the facility and made available for inspection by Department staff upon request.

Access Control, Security, and Public Safety

A seven-foot high security fence surrounds the entire EQFL facility. The fence includes six foot of chain link fabric and a one-foot barbed wire parapet. Entry is controlled at all times through closed lockable gates. The entry control gates consist of lockable pedestrian gates and automatic and lockable vehicle gates. The vehicle gates may remain open for no longer than one (1) hour during normal operations in

which trailers will be changed out. Signs with the legend "Danger - Unauthorized Personnel Keep Out are posted on the fence surrounding the facility. The legend is written in English and Spanish and is legible from a distance of at least 25 feet.

The Waste Management Building is monitored by an automatic alarm system for fire. The fire alarm automatically notifies the City of Tampa Fire Department.

Figure 12 show details of the security measures at the facility.

Fire Control Methods

EQFL also operates a permitted hazardous waste facility at the site. Significant care and precautions have been taken to prevent fires and chemical reactions at the facility. The Waste Management Building has automatic fire sprinkler systems. Ignitable and reactive hazardous wastes are stored in a separate enclosed area in Bay 2 of the Waste Management Building. This ignitable/reactive bay has smoke, flame, and lower explosive limit monitors for detection of fires and reactions. All fixtures in this bay are intrinsically safe (explosion proof). Halon (or equivalent) extinguishers are in Bay 2 as well as an automatic foam fire suppression system and an alarm system to the Tampa Fire Department. Additionally, there are two fire extinguishers and two fire hoses each in Bays 1 and 3. These bays also have fire alarm systems to the Tampa Fire Department. The Covered Processing Area is protected by a portable wheeled fire extinguisher. In addition, the fire hoses in Bays 1 and 3 of the Waste Management Building reach into the Covered Processing Area for water suppression, if needed. A fire department connection is also available on the northeast corner of the facility property and a fire hydrant is located across the street on the south side of Ninth Avenue. Further, the Tampa Fire Department and Hazmat teams (as well as several other agencies) have copies of the EQFL Contingency Plan and are frequently invited for familiarity tours of the facility. Facility operations personnel receive basic fire training.

The Waste Processing Building is equipped with portable fire extinguishers. It also has a small water line to extinguish small fires that may take place. The industrial shredder located in this building has its own integrated fire suppression system with a fire monitoring system and alarm to the Tampa Fire Department. Hazardous waste treatment activities planned in the Waste Processing Building will be limited to the decharacterization and solidification of characteristic wastes, specifically waste codes D002 (corrosive wastes) and D004 thru D011 (inorganic wastes). The waste to be treated will be brought to the Waste Processing Building on an on-demand basis and will only be stored on the floor here as each specific batch is being treated. As such, there will be minimal risk of fire related to the hazardous waste treatment unit/process.

Care and precautions have also been taken for the non-RCRA regulated waste facility operations. The EQFL non-RCRA regulated solid waste management facility will manage waste with only a low potential of ignitability. The most combustible material routinely managed, as non-RCRA regulated waste is used oil for recycling. The flash point of used oil is above 140°F, the level below which is considered ignitable.

Fire prevention controls begin before any waste is received. Waste is profiled and approved prior to waste receipt. Waste streams are inspected, sampled and quality control screened upon receipt per the EQFL Waste Analysis Plan prior to acceptance. This will ensure potentially combustible wastes are properly identified and properly managed.

In the event of a fire at the facility, no waste will be accepted or managed until the fire emergency is terminated. Depending on the extent of the fire damage to the facility, waste receipt may be suspended and waste will be redirected to other facilities.

Waste and waste residue generated due to a fire in the facility will be inspected and profiled according to the type of wastes known to be stored in the area prior to the fire. This will determine if the waste should be managed as hazardous or non-hazardous waste. If the fire-generated waste has been determined to be non-hazardous, the waste can be loaded onto tractor-trailers or roll-offs for transportation to a disposal facility. If the fire-generated waste has been determined to be hazardous, it will be packaged and transported to an appropriate hazardous waste treatment and/or disposal facility in accordance with RCRA regulations and the EQFL hazardous waste permit.



EQ - THE ENVIRONMENTAL QUALITY COMPANY

STANDARD OPERATING PROCEDURE (FL)

Document Number:	OPS-OP-031-FLA	Issue Date:	12/3/07
Author:	Stuart Stapleton	Revision Date:	8/1/08
Job Title:	EHS Manager	Department:	OPS

TITLE: **Solidification**

PURPOSE: To safely and efficiently consolidate incoming material into the solidification unit for final disposal.

SCOPE: This procedure applies to EQ Florida offices and jobsites.

RESPONSIBILITIES: The responsibility and authority for ensuring this procedure remains accurate, in conformance with the standard and implemented accordingly, is assigned to the Operational Vice Presidents.

PROCEDURE:

- 1.0 Prepare a container list of containers to be consolidated using a container content sheet. Check container numbers with the lab to ensure QC analysis has been completed.
- 2.0 Do not bulk containers that are off spec or have no lab analysis!
- 3.0 Scan containers to be solidified with the intended outbound profile. If any disposal or treatment errors occur remove the container from your list to be consolidated.
- 4.0 Have your list reviewed and signed by the shift supervisor. If lab packs are present on your list, be sure to include the container content sheet for the lab pack with your list for approval.
- 5.0 Spray an orange dot on top of all containers approved by the supervisor and move the containers immediately to their process area.
- 6.0 Properly Label Roll-off
 - 6.1 Non-Regulated label with manifest #, accumulation date, etc.

7.0 Don proper PPE.

- 7.1 Non-Regulated- Tyvek, Boots, Respirator (APR yellow or Black Cartridges), Gloves (choice of latex, nitrile or leather)
- 7.2 Regulated- Laminated Tyvek at a minimum, Boots, Respirator with APR yellow or black cartridges at a minimum gloves (choice of latex, nitrile or leather).

8.0 Prepare area & Equipment.

- 8.1 Inspect the area to ensure no waste or leakage is present prior to solidifying.
- 8.2 Line the roll-off with a liner.

9.0 Create a Composite sample from the containers to be solidified. Check for any vigorous reactions or temperature change. Bring the composite sample to the laboratory for a bench test. Bench test will be run to determine amount of solidification agent needed to solidify batch.

10.0 If material needs to be shredded prior to solidification, stage the containers in the appropriate shredder staging area. Once staged and prepared for solidification, follow the Shredding SOP (OPS-OP-030-FLA).

11.0 Begin the solidification process. Starting with solids and thick sludge. Mix the material using a backhoe adding solidification agent as dictated by bench tests.

12.0 After completing the solidification process, confirm that all of the containers were consolidated using the scanner. Press 4 "DO Not Process" for any container that was not consolidated.

13.0 Print new bar code and attach to the roll off.

14.0 Empty containers are to be closed, labels sprayed out, and put into the Empty storage trailer.

15.0 If roll-off is full use Procedure 11 for sampling instructions.

DEFINITIONS:

REFERENCES:

ASSOCIATED DOCUMENTS:

RECORDS: The cited records are retained in a manner that supports the requirements of the various local, State, and federal regulatory agencies to which EQ adheres.



EQ - THE ENVIRONMENTAL QUALITY COMPANY

STANDARD OPERATING PROCEDURE (FL)

Document Number:	OPS-OP-030-FLA	Issue Date:	12/5/07
Author:	Stuart Stapleton	Revision Date:	10/24/13
Job Title:	EHS Manager	Department:	OPS

TITLE: OPERATION OF SHREDDER/CONVEYOR SYSTEM

PURPOSE: To establish procedures for the operation of the shredder and conveyor system. To ensure that: 1) Personnel are protected from accidents and injuries while performing Shredder/Conveyor operations and 2) Equipment is properly operated and maintained.

SCOPE: This procedure applies to the shredder and conveyor located in the EQ Florida solidification building. This program applies to employees who operate or anticipate operating the shredder/conveyor and their supervisors in the Solidification Building at the EQ Florida facility.

RESPONSIBILITIES:

Plant Manager:

The Plant Manager is responsible for ensuring the success of this procedure and for all operations under his control.

The Plant Manager or his/her designee shall monitor the employees periodically to ensure they provide their employees with sufficient training and equipment to allow them to both understand and comply with this procedure.

QEHS Manager:

The QEHS Manager is responsible for providing technical information and ensuring a safe and healthy working environment.

Employees:

Employees are responsible for compliance with the requirements of this procedure.

PROCEDURE:

1.0 General Rules

- 1.1** The operation of the shredder/conveyor is restricted to Associates who are trained and authorized to operate such equipment.

- 1.2 All Associates are required to wear safety glasses and other appropriate protective equipment (i.e., safety glasses, hearing protection, etc.) as designated by the work area and/or other SOPs.
 - 1.3 Before using the shredder/conveyor, the operator shall conduct a daily, visual inspection of the equipment (see Attachment 1) to ensure that the system will start and operate in a safe and reliable manner.
 - 1.4 A Safe System start-up is critical to successful equipment operation. ALL hoppers, discharge chutes, covers, and/or guards must be in place before the equipment is operated.
 - 1.5 The operator of the shredder shall not allow any unauthorized person to handle or add any material to the shredder that has not been pre-placed or pre-approved for shredding.
 - 1.6 The operator shall obey an emergency stop signal from anyone.
 - 1.7 When sorting a load prior to placing on the shredder feed conveyor, the operator shall ensure that all of the following provisions are complied with:
 - 1.7.1 The load is non-hazardous material only;
 - 1.7.2 The load does not contain containers larger than a five (5) gallon pail;
 - 1.7.3 The load is a pre-approved load identified by the operator;
 - 1.7.4 No flammable materials are to be fed to the shredder.
 - 1.8 Before leaving a shredder unattended, the operator shall ensure that all waste has been processed, and that the shredder/conveyor has been properly shut down.
 - 1.9 When the shredder/conveyor system is operating there shall be two persons in attendance at all times.
 - 1.10 Never open the Shredder Hopper cover doors while the shredder is operating. Never attempt to remove waste, dislodge material or force material into the cutting knives (throat of the shredder) while the shredder is running.
 - 1.11 Shutoff and lock out the shredder and conveyor before removing any material from the machine hopper. Use appropriate tools for grabbing and removing materials from the shredder throat area. Never climb over the hopper walls and into the shredder throat. If the shredder becomes jammed and the material cannot be removed contact EQ Engineering immediately.
- 2.0 Start-Up Procedure for Shredder/Conveyor
- 2.1 Make sure that all operators/personnel are safely positioned away from the shredder and conveyor.
 - 2.2 Throw the two disconnects for the shredder motors #1 and #2 to the ON position.
 - 2.3 Throw the disconnect for the conveyor hydraulic pump to the ON position.
 - 2.4 Proceed to the SQUARE D STARTER CABINET and throw the main disconnect to the ON position.

- 2.5 Remove all unauthorized personnel from the area and inform others to stand clear of the shredder and conveyor.
 - 2.6 Return to the SQUARE D STARTER CABINET. Note the positions of the following switches.
 - 2.6.1 BYPASS/NORM should be set to "NORM"
 - 2.6.2 FORWARD/OFF/REFVERSE should be set to "FORWARD"
 - 2.6.3 AMMETER SELECTOR switches (one for each motor) set to "2"
 - 2.7 Before starting the shredder go to the operator platform, turn on the camera and ensure that there is no material in the shredder hopper. There should be no material in the shredder feed hopper when starting the machine. If material is present shut off the disconnects, lock-out/tag-out the disconnects and proceed to remove the material out of the shredder. Once the material has been removed return to procedure 2.1.
 - 2.8 Push the GREEN START SHREDDER button and hold until the audible alarm sounds. Release the start button. The alarm will sound for about 12 seconds. The shredder motors will energize when the alarm stops. The ammeter gages should display ~29 amps each.
 - 2.9 The conveyor cannot be started until the shredder is started unless the keyed override on the conveyor starter panel is engaged to the override position. The override should be used only for testing and cleaning the conveyor when the shredder is not running.
 - 2.10 The conveyor hydraulic valve selector lever should be in the neutral position (center position) prior to starting the conveyor hydraulics.
 - 2.11 Push the BLUE START BUTTON on the conveyor panel to start the conveyor hydraulic pump.
 - 2.12 The conveyor speed and direction is controlled by the hydraulic valve selector lever and the flow control valve located on the operator platform. The selector lever has three positions.
 - 2.12.1 UP (AWAY FROM YOU) CAUSES THE CONVEYOR TO MOVE FORWARD (TOWARD THE SHREDDER AND AWAY FROM THE OPERATING PLATFORM)
 - 2.12.2 CENTER IS NEUTRAL (STOPS THE CONVEYOR)
 - 2.12.3 DOWN (TOWARD YOU) CAUSES THE CONVEYOR TO MOVE IN REVERSE (AWAY FROM THE SHREDDER AND TOWARD THE OPERATING PLATFORM)
 - 2.13 The speed of the conveyor is adjusted by turning the flow control knob clockwise or counterclockwise. It is recommended to start the conveyor at a slower speed during initial shredding to determine the proper feed rate for the shredder.
- 3.0 Emergency Stops
- 3.1 There are four (4) emergency stops. Pulling any of these stops will kill the power to the shredder and conveyor. The E-Stops are located at the following locations.

- 3.1.1 STARTER CABINET DOOR
- 3.1.2 OPERATOR PLATFORM AT THE TOP OF THE STEPS
- 3.1.3 MAN DOOR AT NORTHEAST CORNER OF SOLIDIFICATION BUILDING
- 3.1.4 ON THE EAST WALL BY THE EYEWASH AND SAFETY SHOWER

4.0 Fire Suppression System

- 4.1 Refer to the CO₂ Fire Suppression drawings by Flagship Fire Inc. for layouts of the System. Also refer to the Sequence of Operations for the Shredder fire suppression system.
- 4.2 The fire suppression system is a CO₂ system comprising of four (4) 100 pound CO₂ cylinders, discharge nozzles in the feed hopper (1) and in the receiving hopper (4), thermal detectors (2), pull stations (3) and a FIKE control panel. The system is tied in with EQ FL's alarm notification system.
- 4.3 The system will be inspected annually.
- 4.4 The fire suppression system can be activated in two ways.
 - 4.4.1 One of the two thermal detectors senses heat and activates the system.
 - 4.4.2 Manually – One of the three pull stations is manually activated. The pull stations can be found in the following locations.
 - 4.4.2.1 OPERATOR PLATFORM AT THE TOP OF THE STEPS.
 - 4.4.2.2 MAN DOOR AT NORTHEAST CORNER OF SOLIDIFICATION BUILDING
 - 4.4.2.3 ON THE EAST WALL BY THE EYEWASH AND SAFETY SHOWER
- 4.5 Hand held fire extinguishers are also located in the Solidification Building. The operator of the shredder shall make sure that all fire extinguishers are readily available and within reach prior to start-up of the shredder.
 - 4.5.1 Fire extinguisher shall be pointed towards the bottom of the exiting point of the shredder.
 - 4.5.2 A second fire extinguisher shall be placed in a readily accessible location where the operator of the unit does not take longer than 4 second to reach and take action towards a small fire.
 - 4.5.3 The operator will not try to extinguish any fire that is larger than his/her control. Do not attempt to fight a fire that is in the shredder hopper. Activate the fire suppression system manually if a fire or smoke is observed in the shredder hopper.
- 4.6 All incidents regarding the shredder will be immediately reported upon completion of response actions.
- 4.7 Post-Incident investigations and reports shall be completed prior to commencing shredder operations.

5.0 Processing/Shredding Waste Operation

- 5.1 The main purpose of the shredder is to reduce the volume of material/waste to be placed in the non-haz solidification mixing tank. Only non-hazardous waste should be processed in the shredder.
 - 5.2 The following list of materials/waste shall not be processed in the shredder. This list is not exhaustive.
 - 5.2.1 Hazardous waste
 - 5.2.2 Flammable materials such as oil based paints, solvent based paints, aerosol cans
 - 5.2.3 Corrosives
 - 5.2.4 Reactives
 - 5.2.5 Powders/Solids
 - 5.2.6 Oxidizers
 - 5.3 All waste streams for the shredder must be approved by the EHS manager prior to processing. There will be no exceptions to the list in Section 5.2 without the approval of the General Manager and the EHS manager.
 - 5.4 The shredder is capable of handling 5 gallon steel or plastic containers. Waste contained in plastic bags can be processed in the bags. The shredder does not process cardboard well due to its light weight. Never stand over the top of the shredder while it is running and attempt to push light weight objects through the throat of the shredder.
 - 5.5 All waste to be processed should be adequately organized and staged ahead of time.
 - 5.6 Process the waste only as fast as the shredder can shred the waste. Never allow the waste to back up into the shredder hopper. Allowing the feed waste to get high enough in the hopper to make contact with the conveyor belt can cause significant damage to the conveyor belt. Monitor the camera to get an idea of how well the shredder is accepting the feed. There are two ways to control the feed rate. One is by controlling the belt speed. The other involves the placement of the waste on the conveyor belt. Placing waste on every other slot or every third slot on the belt will give the shredder additional time to shred the feed.
 - 5.7 When processing detergents or latex paints be sure to stop periodically and turn on the water sprays to clean the conveyor belt in order to avoid belt slippage.
- 6.0 Shut Down Procedure
- 6.1 Prior to shutting the system off insure that all material has been processed through the shredder. Do not leave material on the sorting table, on the conveyor or in the shredder. The following steps should be taken in order to properly shut down the Shredder/Conveyor System.
 - 6.1.1 While the conveyor belt is still moving turn on the water sprays. Allow only enough flow to adequately rinse the belts and drive drum. The belt speed can be increased to speed up this process. Make sure the entire length of belt receives rinsing. Be careful to avoid overflowing the collection pan underneath the conveyor drain. Rinse for about 3-5 minutes or until the belt and rollers have been adequately cleaned. Turn off the conveyor when the

rinsing has been completed. Empty the contents of the collection pan under the conveyor into the non-haz solidification tank.

6.1.2 Clean the sorting table using a water hose. Drain the washings into the 55 gallon drum that the table trench drain empties into. Close the trough drain valve, remove and empty the drum into the non-haz solidification tank.

6.1.3 Turn off the shredder, allow the shredder motors to come to a complete stop and reverse the direction of the cutting knives by turning the selector switch on the starter panel from forward to reverse. Restart the shredder. Allow the shredder to run in reverse for 3-5 minutes or until material stops falling down out of the shredder. Once material stops exiting the shredder turn off the shredder. After the shredder motors have completely stopped turning return the selector switch back to forward.

6.2 After steps 6.1.1 through 6.1.3 have been completed the disconnects for the shredder motors, hydraulic pump, and starter panel should be moved down to the off position.

6.3 Turn off the shredder video camera.

6.4 Empty the contents of the 3 yd hopper that sits under the shredder.

6.5 Clean up any spillage that may have occurred in and around the shredder/conveyor operation.

7.0 Maintenance

7.1 Before performing any maintenance on shredder equipment, lock out of the main electrical disconnect system switch and all motor disconnects shall be conducted. Maintenance personnel must wear safety helmets, safety glasses, and steel-toed shoes, to maintain equipment. Only maintenance personnel are to perform any repairs on the shredder.

7.2 Some equipment parts may be hot after equipment operation. During cutting chamber maintenance, sharp debris in the cutting chamber could cause serious injury.

7.3 After completing maintenance work, all bolts shall be torqued to the proper specifications. All covers, guards, and safety devices shall be in place prior to commencing operations.

DEFINITIONS:

REFERENCES: These procedures follow the requirements specified by ANSI/UL913 and NFPA 70 Article 504:

Permissible practice and operation;
Requirements for an approved operating training and testing program; and
Maintenance and testing of shredder devices.

ASSOCIATED DOCUMENTS:

Daily Inspection
CO2 Fire Suppression Drawings and Sequence of Operation by Flagship Fire Inc.
Hazardous Energy Control Procedure Form
Periodic Inspection
Shredder Maintenance Log –Shaft Tension
Shredder Preventative Maintenance Log
Shredder Operator Training Record and Permit

RECORDS: The cited records are retained in a manner that supports the requirements of the various local, State, and federal regulatory agencies to which EQ adheres.

ATTACHMENT 1
EQ FL SHREDDING SYSTEM STARTUP CHECKLIST

This inspection checklist should be used every time the shredder/conveyor system is to be turned on in order to ensure safe and reliable operation. The system should be inspected prior to starting the machines.

1. Refer to the Shredder Preventative Maintenance Log to make sure that oil levels are correct, grease has been applied where required and tensioning of the knives has been performed as required. Refer to the SHRED-TECH ST-50, B262-A-002 MANUAL for additional information about the Shredder.
2. Check for water leaks. Test the water sprays to make sure they are working properly. There are two spray nozzles pointing up toward the drive drum and two nozzles pointing down toward the reverse side of the conveyor belt.
3. Check for hydraulic oil leaks.
4. Check that the collection pan under the base of the conveyor is in place and empty.
5. Check that the receiving hopper under the shredder is empty and in proper position. In most cases it is advisable to line the hopper with plastic sheeting. This will enable the operator to quickly dump the contents into the solidification pit when necessary.
6. Check that the 55 gallon waste drum for the sorting table trough drain is empty and in its proper position under the drain valve. The valve should remain closed when the system is not in use or when the drum is removed for emptying and open during operation. Make sure the valve is open prior to startup.
7. Check to see that the camera monitor turns on properly and the camera angle is correct.
8. The shredder and conveyor should be empty. Looking into the camera you should be able to see light coming through the throat of the shredder indicating that the throat is clear of debris.
9. Check to see if the drain on the sorting /feed table is clean. If not remove the steel plate with holes and clean the drain trough as needed.
10. Check to make sure that the hinged tops on the shredder feed hopper are closed.
11. Check to make sure that the E-Stops and Fire Pulls have not been tampered with. The shredder system will not start if one of the E-Stops is engaged.
12. Check to make sure that the egress aisle from the bottom of the sorting table platform to the east man door along the north side of the building is free and clear of debris, drums, pallets, etc. There should be at least 3 feet of free aisle space to allow for safe passage to the exit in the case of an emergency.

Prior to starting the system the material to be fed should be staged in an organized fashion to allow for consistent feed in shortest amount of time. The materials to be run should be reviewed for compatibility, the potential for dusting and the potential to produce unpleasant odors.

Material safety data sheets should be reviewed if available.

APPENDIX D

CONTINGENCY PLAN

CONTINGENCY/EMERGENCY RESPONSE PLAN

FOR

EQ FLORIDA, INC.

FLD981932494

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ATTACHMENTS

Emergency Safety Equipment

FIGURES

Site Area/Location Map

Facility Layout Plan

Emergency Preparedness Plan

Routes to Hospital

GENERAL INFORMATION

EQ Florida, Inc. (EQ) operates a hazardous waste storage, treatment, and transfer facility at:

2002 N. Orient Road
Tampa, Florida 33619
FLD981932494

The facility is located on 1.4 acres (MOL) of land on Orient Road. The actual storage and treatment area is located within a 5,866 square foot building. The building is divided into three (3) Bays. Each of the bays has front and rear exits, spill containment sumps, fire alarms and safety equipment. The equipment and systems are described in other sections of this Plan. A Site Area/Location Map and a Facility Layout Plan are attached.

The facility is designed to minimize the potential for any release of hazardous wastes or constituents. Vehicles are able to load and unload directly to and from the warehouse. Virtually any potential release would be contained by the warehouse and its sumps, or within the vehicle. The vehicle transfer area is sloped and diked for containment. Waste materials are segregated by hazard class to insure that no incompatible wastes are stored together. All flammable materials are stored in a separate Bay designed solely for that purpose. The building is fully sprinkled. The flammable storage area has an automatic foam fire suppression system. The building has both smoke and flame detectors which are continuously monitored.

Fire extinguishers and fire hoses are located throughout the building. Safety equipment, proximity suits, SCBA and material handling equipment are also available. Emergency safety equipment is listed in Attachment 1. Hazardous materials potentially on-site may include: acids; alkalis; poisons; flammables; combustibles; oxidizers; reactives; and other regulated solids or liquids which do not fall into these classifications. Most will be present in small quantities or in diluted concentrations when compared to the original raw material. No regulated radioactive, pathological, or explosive materials will be located at this facility. A daily inventory of all materials stored at this facility is readily available.

EQ also conducts solid waste operations adjacent (contiguous property) to the hazardous waste permitted site located on 3.06 acres (MOL) of land. The property is located at

7202 E. 8th Avenue
Tampa, FL 33619

Solid waste operations include the waste processing building and the solid waste operations area. These areas are also designed to minimize the potential for any release of solid waste or constituents as cubing will contain potential releases. Loading and unloading will be conducted within the curbing in order to contain potential releases. Fire extinguishers are located in these areas as well as safety equipment, sorbents and material handling equipment. Emergency safety equipment is listed in Attachment 1.

Operations in the waste processing building will continue as approved under the current permit (i.e., container storage and treatment) and the building will be reconfigured following approval of the current permit application. Specifically, an on-ground hazardous waste treatment unit/tank will be constructed and operated where the solid waste engineered solidification unit (ESU) currently exists. The purpose of the new unit is to treat characteristically hazardous waste codes D002 (corrosivity); D004 (arsenic); D005 (barium); D006 (cadmium); D007 (chromium); D008 (lead); D009 (mercury); D010 (selenium); and D011 (silver). No listed hazardous wastes will be treated at the facility. A new solid waste ESU and associated ramp will be constructed to the north of the proposed hazardous waste unit. The waste processing building will also house the following:

- The existing industrial shredder located in the northwestern portion of the building.
- A self-contained and explosion proof reactivities magazine will be installed in the west central portion of the building. It will be used for the temporary storage and pass-through of road flares, DOT 1.4 material, marine aerial and signal flares, small arms munitions, black powder, residential fireworks and other permitted explosives.
- A 6,000 gallon oil-water separator tank/system is also planned to be installed outside the northeast corner of the waste processing building.

Purpose

The purpose of this plan is to provide EQ employees and responding agencies with an organized procedure for responding to unusual occurrences or emergencies involving hazardous chemicals and/or wastes when such releases could cause potential harm to human health or the environment. This plan is designed to present as simply as possible the necessary steps required in an emergency.

Emergencies covered under this procedure are fires, explosions, or an unplanned sudden and non-sudden release into the environment of hazardous waste including liquids, vapors and particulates that could cause harm to human health or the environment. All operations personnel are trained in emergency response, hazardous waste operations, solid waste operations, fire fighting procedures, emergency first aid, and CPR.

Implementation

This Contingency Plan will be implemented immediately whenever there is a fire, explosion, or release of hazardous and non-hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater at the facility, which could threaten human health or the environment.

Copies of Contingency Plan

A copy of the Contingency Plan is maintained at the waste management building and the waste processing building. Key personnel such as Emergency Response Coordinators and Alternates have copies of the Contingency Plan. Copies of the Contingency Plan have been submitted to the parties indicated in the mailing list at the end of this document.

Amendment of Contingency Plan

The EQ Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

1. The EQ facility permit is revised;
2. The plan fails in an emergency;
3. The facility changes design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
4. The Emergency Coordinators list changes, or
5. The emergency equipment list changes.

EMERGENCY NOTIFICATIONS

Coordination Agreements

The City of Tampa Fire Department, Tampa Police Department, FDEP, hospitals (Tampa General and Brandon General Hospitals) and an outside spill response contractor have been notified as to the operation of this facility. All agencies have been invited to inspect the site and become aware and familiar of waste locations, access, on-site emergency equipment, and available fire protection items. A copy of the contingency plan has been sent to these organizations. An agency notification contact list is provided below:

Agency	Emergencies Notified For:	Telephone #
Tampa Fire Department	Any Potential fire or explosion	911 (Emergencies) 813-232-6800
Tampa Police Department	Any evacuation, traffic or security issue	911 (Emergencies) 813-231-6130
State Watch Office	All Contingency Plan incidents	800-320-0519 (24hr)
State Emergency Response Team	All Contingency Plan incidents	850-413-9911 (24hr)
FDEP SW District Office	All Contingency Plan incidents	813-470-5700
EQ Florida, Inc.	All Contingency Plan incidents	813-623-5302 800-624-5302 (24hr)
Brandon General Hospital	Any Medical emergency	911 (Emergencies) 813-681-5551
Tampa General Hospital	Any Medical emergency	911 (Emergencies) 813-844-7000

Emergency Response Coordinators

At all times, there will be at least one employee either on-site or on call with the responsibility for coordinating all emergency response operations. The coordinator and alternates are thoroughly familiar with all aspects of the EQ Contingency Plan, all operations, the location and characteristic of wastes managed, the location of records, and the site layout.

	Coordinator	Primary Alternate	Secondary Alternate
Name	Gene Cieply	Stuart Stapleton	Ken Dean
Address	2051 Vista del Sol Circle, Unit 207	619 Cedar Grove Dr.	30039 Bermuda Dunes Way
City, State, & Zip	Lutz, FL 33558	Brandon, FL 33511	Wesley Chapel, FL 33543
Work Phone #	813-319-3410	813-319-3423	813-319-3433
Home Phone #	813-777-3998	813-412-2302	813-994-3892
Mobile #	813-777-3998	813-770-9954	813-748-4403

The EQ Emergency Response Coordinator and Alternates have the authority to commit corporate funds and resources during an emergency incident involving a fire, explosion, or release of hazardous waste(s) and or constituents to the air, soil, surface water, or ground water at the facility which could threaten human health or the environment.

EMERGENCY EQUIPMENT AND COMMUNICATIONS SYSTEMS

Emergency Equipment

1. **Fire extinguishers** located throughout and are prominently identified by signs and red markings. ABC extinguishers are located in Bays 1 and 3 in the waste management building, in the waste processing building, and in the waste operations area. Halon and metal-x extinguishers are located in the flammable storage area (Bay 2) in the waste management building.
2. **Hazorb (or equivalent) sorbent** is used to absorb any chemical spill. Located in bags identified by name.
3. **Oil-Dri** and **Vermiculite** are used for solvent and oil spills. Located in bags identified with the words Oil-Dri or Vermiculite.
4. **Calcium carbonate** and **lime** are used to neutralize acids. Located in bags identified by the words Calcium Carbonate or Lime.
5. **Citric Acid** is used to neutralize alkalines. Bags are identified by the words Citric Acid.
6. **Spill control/sorbent booms** are used to contain any spill. Spill control booms are available in various lengths.
7. **Protective Clothing** including PVC suits and polyethylene splash suits. PVC suits are rubberized suits while the splash suits are polyethylene coated paper clothing. Protective Suits are available in Levels A through D.
8. **Full-face respirators, air-line respirators** and **SCBA** are available for respiratory protection.
9. **Gloves, boots, face shields, goggles** and **hard hats** may be used as protective equipment.
10. **Plug and dike sealant** used to seal leaking containers.
11. Air powered **pumps with hose** for removal of liquids or water. Identified by lack of electrical connection.
12. **Manual pump** for removal of any flammable liquids.
13. **Drum pumps** for removal of any containerized liquids. Pumps are capable of fitting inside of a drum bung.
14. Compressed air cylinders to be used in conjunction with air supplied respirators. Cylinders marked with the words **Breathing Air.**
15. **Shovels, brooms, buckets, mops, tools, bung wrenches**, etc.
16. **Telephones** are located on the north and south walls of the main storage area, in the waste processing building office, and in the office area.
17. Empty **DOT-approved containers**.
18. Empty **85 and 110 gallon overpack drums** are used to recontainerizing damaged or leaking containers.
19. An **emergency shower** is located in the processing and storage areas (Bay 1) in the waste management building.

20. **Eye wash systems** are located in the waste management building (Bays 1 and 3) and in the waste processing building.
21. **Flame and smoke detectors** are located in the flammable storage area. **Lower explosive limit (LED)** monitors are located in the flammable storage area and smoke detectors are available in the general storage area.

Empty drums, oil dri, vermiculite and sorbent boom are located in materials storage trailers. The fire extinguishers are on the walls and identified by red markings and the sign "Fire Extinguisher".

Communications Systems

1. **Air horns** are located throughout the waste management building and in the waste processing building. In case of a spill, explosion, or other emergency, these can be used to alert all employees that evacuation is necessary.
2. An **intercom system** for verbal notification is located throughout the waste management building. Non-evacuation commands are to be given over the intercom.
3. Twenty-four hour **monitored alarms** are located throughout the waste management building.
4. **Mobile phones** are available at the waste management building and the waste processing building facility.
5. **Telephones** are available at the waste management building.

EVACUATION PLAN

Emergency situation and evacuation notification procedures are discussed in this section.

1. Notification to evacuate in an emergency would be handled by one of several methods. These are:
 - a. Emergency air horns are located throughout the facility and are sounded when evacuation is necessitated.
 - b. An intercom system is also located throughout the waste management building and can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
 - c. Pull alarms are located throughout the waste management building.
 - d. Phones are available throughout the waste management building.
 - e. Mobile phones are also available at the waste management building and the waste processing building.
2. In the event of an emergency situation (spill, fire, explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms.
3. All personnel are to evacuate. An emergency preparedness (evacuation route) figure is attached hereto. The primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed.

EMERGENCY PROCEDURES AND FACILITY PERSONNEL ACTIONS

Communications

The purpose of this section is to establish the organizational structure that will be in force during a response to a chemical emergency and what procedures will be utilized to notify corporate officials, outside response teams, local government authorities, and State and Federal Regulatory Agencies.

Internal Communications

In the event of an emergency situation involving hazardous chemicals or wastes, the emergency response coordinator or designated alternate shall be responsible for coordinating the necessary response and/or cleanup.

EQ management is to be notified immediately upon discovery of an emergency situation involving hazardous chemicals or wastes.

EQ Florida, Inc.
2002 N. Orient Road
Tampa, FL 33619
813-623-5302 or 800-624-5302 (24hr)

EQ management will notify, via telephone, radio, mobile telephone or pager, the required EQ personnel for response to the scene. EQ emergency response vehicles are equipped with necessary cleanup/safety materials and first aid supplies. Trailers, sheds, and lockers on site also contain safety equipment and supplies.

External Communications

In any emergency situation, contact the following:

1. Tampa Fire Department (**911**). Indicate the extent and type of emergency which exists (fire, spill, etc.).
2. In the event of emergencies involving chemical spills, leaks, or explosions (which may require additional assistance), at the direction of the EQ Emergency Coordinator/Alternate a spill response contractor can be notified.

Government Agency Notification

In the event of an emergency where environmental contamination is eminent, in addition to notifying the Tampa Fire Department (**911 emergencies**), the following governmental agencies will be notified by the EQ Emergency Coordinator/Alternate.

- | | |
|--|---|
| 1. State of Florida Warning Point
850-488-1320 (24hr) | 2. FDEP OER State Watch Office
800-320-0519 (24hr) |
| 3. National Response Center (NRC)
800-424-8802 | 4. State Emergency Response Team
850-413-9111 (24hr) |
| 5. FDEP Southwest District Office
Tampa, Florida
813-470-5700 (normal working hours) | Hillsborough County
Solid Waste Department
813-272-5680 |

In addition to the NRC, the government official designated as the FDEP On-Scene Coordinator (OSC) must be contacted. This can be accomplished by calling 850-488-1320.

The following information will be communicated to the governmental agencies contacted.

1. Name and telephone number of the reporter.
2. Name and address of the facility.
3. Time of the incident.
4. Type of incident (whether fire, explosion, or release).
5. Name of the material released.
6. Quantity of the material released.
7. Additional information such as liquid, vapor, or solid.
8. Type of incident (release from drum, tank, truck, or warehouse).
9. Extent of injury or injuries, if any.
10. Possible hazards to human health or the environment, outside the facility.
11. Weather conditions (wind direction, rain, etc.).
12. Potential for release or spill of material into surface waters.

Within 15 days of any incident the facility manager will notify the FDEP electronically that the Contingency Plan has been implemented. All of the aforementioned items will be addressed as well as the quantity and disposition of all recovered materials resulting from the incident.

Identification of Hazardous Materials Locations

Warehouse Bay 1 (North Bay)

1. Acids
2. Toxic Organics and Metals
3. Non-flammable solvents and halogens
4. Asbestos

Warehouse Bay 2 (Center)

1. Flammable liquids and solids
2. Reactive cyanides, sulfides, and metals

Warehouse Bay 3 (South Bay)

1. Poisons
2. Oxidizers
3. Caustics
4. Non-Hazardous and Non-Regulated Solid Waste

The warehouse doors (west / front side) are placarded with the hazard class of the material stored in that particular Bay.

Office/Lab

1. Satellite accumulation (5 gallon or less) of flammable, corrosive, chemical rags, and battery wastes.

Transfer Facility Vehicles (Located in the vehicle loading and unloading areas)

1. Trailers
2. Box Trucks
3. Vans
4. Tankers
5. Roll-Offs

All vehicles containing hazardous waste are placarded and manifested per DOT and RCRA requirements. The placards will identify the hazard class of each trailer, roll-off, tanker, or vehicle.

Waste Processing Building

1. Non-Hazardous and Non-Regulated solid waste
2. Characteristically hazardous waste (D-002 & D-004 – D-011)

Solid Waste Operations Area

1. Non-Hazardous and Non-Regulated solid waste
2. Decharacterized hazardous waste meeting the LDRs

Loading and Unloading Area

1. Acids
2. Toxic Organics and Metals
3. Non-flammable solvents and halogens
4. Asbestos
5. Flammable liquids and solids
6. Reactive cyanides, sulfides, and metals
7. Poisons
8. Oxidizers
9. Caustics
10. Non-Hazardous and Non-Regulated Solid Waste

Processing Equipment

1. Paint Can Crusher
2. Drum Crusher
3. Fluorescent Bulb Crusher
4. Transfer Pumps (portable air, electric, and manual)

The above processing equipment operates on a batch mode. The equipment will be shut off and disconnected when emergency situations occur. Waste containers in process will be closed when the equipment is shut down for an emergency.

Waste Types Managed

Approximately 1/3 of the waste managed is non-hazardous or non-regulated. These containers and vehicles can be identified by a blue "Non-Regulated Waste" DOT label. The material presents **no hazard** (such as poison, flammable, corrosive, reactive, oxidizer) if the container does not have a DOT label. However, any release must be contained to prevent a release that may potentially contaminate waters or soils.

Several trailers may be at the facility which do not contain hazardous or non-hazardous wastes. These trailers may be empty, contain new empty drums, contain used empty drums for recycling, or contain safety equipment and supplies. No potential hazard is associated with these vehicles.

The emergency response coordinator or alternate will coordinate the identification of hazardous materials involved in an emergency incident requiring implementation of the contingency plan. A complete inventory of all waste materials is available at the facility. The identification can be narrowed by the source of the incident. For example, if an incident occurred in Bay 2 of the warehouse, the materials would be limited to flammables and reactives. All containers are identified by a unique EQ identification number, DOT hazard class labels, and hazardous waste shipping labels. The contents of any container can be fully characterized if the EQ identification number is known. EQ has an on-site laboratory and HAZCAT identification kit available should it be necessary to characterize a sample of a potential hazardous material. The coordinator or alternate is therefore able to identify the source, characteristics, amount, and extent of any released materials, by observations, review of facility data, records and shipping documents, or by chemical analysis.

Hazardous Materials Emergency Response References

The following is a list of references available at EQ:

1. HAZARDOUS CHEMICAL DATA, Department of Transportation/U.S. Coast Guard.
2. HAZARDOUS MATERIALS EMERGENCY RESPONSE GUIDEBOOK, Department of Transportation/DOT P 5800.2.
3. MERCK INDEX.
4. HANDBOOK OF HAZARDOUS MATERIALS, Sax.
5. NFPA 101 LIFE SAFETY CODE.
6. CANCER CAUSING CHEMICALS, Sax.
7. TOXIC ORGANIC CHEMICALS, E. Ellsworth Hackman III.
8. NIOSH REGISTRY OF TOXIC EFFECTS OF CHEMICAL SUBSTANCES.
9. EMERGENCY FIRST AID, American Red Cross.
10. CONDENSED CHEMICAL DICTIONARY, Hawley.
11. HAZARDOUS MATERIALS, SUBSTANCES, & WASTES COMPLIANCE GUIDE.

HAZARD ASSESSMENT

The emergency response coordinator or alternate will assess the potential hazards to human health or the environment that may result from a release, fire, or explosion of hazardous waste or hazardous waste constituents. The assessment will consider both direct and indirect effects of the release, fire, or explosion.

The contingency plan will be implemented whenever the emergency coordinator/alternate determines an imminent or actual hazard exists which could threaten human health or the environment. This section provides the criteria used by the emergency coordinator/alternate in making the decision to implement the contingency plan.

Fire or Explosion

For incidents involving a fire or explosion, the following situations will result in contingency plan implementation:

1. A fire which could cause the release of toxic fumes.
2. A fire which could spread and possibly ignite other materials or which could cause heat-induced explosions.
3. A fire that could spread to off-site areas.
4. The use of water or chemical fire suppressants that could result in contaminated runoff.
5. The imminent danger of an explosion that could result in a safety hazard due to flying fragments or shock waves.
6. The imminent danger of an explosion that could result in the release of toxic materials.
7. The occurrence of any explosion.

Fire Fighting Procedures

The waste management building is equipped with both smoke and flame detectors. Both are monitored on a twenty-four hour per day basis. If either are activated, the sprinkler and/or foam systems will automatically engage. The Tampa Fire Department is notified automatically by the continuous alarm/monitory system.

Also included in the monitoring system is a LEL detector within the flammable storage area. There are two detectors. One is mounted in the spill sump to detect vapors which are denser than air. The second is mounted on the ceiling to detect vapors less dense than air. If vapors in the flammable area exceed 10% of the lower explosive limit, the ventilation system will automatically engage and the sprinkler and foam systems will be activated automatically. The Tampa Fire Department is notified automatically at 10% LEL.

Located throughout the waste management building are fire extinguishers for Class A, B or C fires. Located in the flammable area are Halon extinguishers (or equivalent). Fire hoses are located throughout the building.

The waste processing building and the solid waste operations area are equipped with fire extinguishers for Class A, B or C fires.

In the event of a fire, the following activities will be performed:

1. Notify other employees. If evacuation is necessary, sound the air horns and alarms.
2. Notify the Tampa Fire Department (911).
3. Move all transport vehicles.
4. Control the fire with extinguishers if it can be done safely.

5. The waste management building, the waste processing building, and the solid waste operations area facility is designed for minimal manual fire suppression.
6. Notify necessary agencies as indicated.

Unplanned Material Release

The contingency plan will be implemented for any release to the environment that results in one or more of the following conditions:

1. A spill that could result in the release of flammable liquids or vapors, thereby causing a fire or explosion hazard.
2. A spill which could cause the release of toxic liquids or fumes.
3. A spill which could be contained on the site, but which could potentially result in groundwater contamination.
4. A spill that cannot be contained on the site resulting in off-site soil, groundwater, or surface water contamination.
5. Any flooding of the site that could result in surface water contamination.

PERSONAL PROTECTIVE EQUIPMENT

In order to provide adequate protection from hazardous exposures, personal protective equipment must be used. The following indicates various hazardous situations and the personnel protective equipment that is required.

Level A Protection

Level A Personal Protective Equipment is required for the following hazardous situations including:

- Situations immediately dangerous to life and health.
- Oxygen deficient atmospheres.
- Unknown hazardous materials.
- Chemicals which can be absorbed through the skin.
- Materials which cannot be removed with an air purifying respirator.

Level A Personal Protective Equipment includes:

- SCBA or air line respirator with SCBA escape air system.
- Full body encapsulation suit.

Level B Protection

Level B Personal Protective Equipment is required for the following hazardous situations including:

- Oxygen deficient atmosphere where chemical composition of the material is known and falls into the classification of an irritant.

Level B Personal Protective Equipment includes:

- SCBA or air line respirator with SCBA for emergency use.
- PVC splash suit with hood.
- Neoprene/nitrile/butyl rubber arm length gloves.
- Steel-toed rubber boots.

Level C Protection

Level C Personal Protective Equipment is required for the following hazardous situations including:

- Situations not immediately dangerous to life and health.
- Sufficient oxygen present to support life.
- Irritant or corrosive chemicals.
- Contaminated soils.
- Liquid/solvents not immediately dangerous to life and health.

Level C Personal Protective Equipment includes:

- Full face mask with air purifying (cartridge) respirator; or, half face (cartridge) respirator with goggles and face shield.
- PVC splash suit.
- Protective gloves (type dependent on chemical being handled).
- Steel-toed rubber boots.

Level D Protection

Level D Personal Protective Equipment is required for the following hazardous situations including:

- Situations which contain no immediate hazard but where there is the potential for accidental release of a hazardous substance.

Level D Personal Protective Equipment includes:

- Half face air purifying (cartridge) respirator.
- Safety goggles.
- Disposable coveralls.
- Surgical rubber gloves or suitable hand protection.
- Rubber boots or steel-toed shoes.

CONTAINMENT AND CONTROL MEASURES

The purpose of this section is to alert all emergency response groups, regulatory agencies and affected parties, as to the location of the hazardous waste storage areas within the facility, the design of containment control, and the procedures to be followed in response to emergencies, whether fire, explosion, or spill. **It must be understood that potentially toxic gases and vapors may be present in any incident involving hazardous materials.**

Entrance Procedures

The following procedures are to be followed by all response personnel before entering the hazardous waste storage areas in emergency situations:

1. Consult the attached drawing which indicates the layout of the facility. A general description of the wastes stored in the various areas at the facility is provided above in the "Identification of Hazardous Materials Locations" section.
2. Assume toxic/hazardous materials are present in the area. A complete inventory is kept in the office area.
3. Select proper protective gear, including SCBA.
4. Consult DOT P 5800.2 HAZARDOUS MATERIALS EMERGENCY RESPONSE

GUIDE BOOK which is in the office area.

Remember, the primary responsibility during initial emergency response efforts is to save lives and protect the environment.

Fire or Explosion Response Procedures

Should a fire or explosion occur, the following steps are to be taken:

1. Notification to evacuate in an emergency would be handled by one of several methods. These are:
 - a. Emergency air horns are sounded when evacuation is necessitated.
 - b. An intercom system can also be used for notifying employees to evacuate the building. Verbal commands will be given should the intercom system be inoperative.
 - c. Pull alarms are located throughout.
 - d. Phones are available throughout.
 - e. Two-way radios are available at the waste management building.
 - f. Mobile phones are available.
2. In the event of an emergency situation (fire or explosion) the first employee to notice the emergency is to immediately sound the emergency air horns and/or alarms.
3. All employees are to don the necessary protective equipment including self-contained breathing apparatus (SCBA). This equipment is located in the safety equipment cabinets in Bay 1 and Bay 3 of the waste management building, in the storage room in the office, and on the safety equipment and supply trailer. Additional safety equipment is provided in these locations.
4. Fire fighting or spill containment should begin immediately under the direction of the facility manager/supervisor until the EQ Emergency Coordinator/Alternate arrives on-site. Procedures are identified later in this chapter. Refer to the Chemical Hazardous Response Information System (CHRIS) Manual for additional information.
5. The facility supervisor is to contact the EQ Emergency Coordinator/Alternate immediately (telephone numbers are listed).
6. In the event of a fire or explosion, the sprinkler and foam systems will be automatically activated. Both the alarm and sprinkler system are monitored on a 24-hour basis. When the alarm or sprinklers are activated, the Tampa Fire Department will be notified immediately and automatically.
7. Electric service to the building should be shut off in the event of a fire or explosion. The main electric shut off is located on the outside south wall of the container storage building. No additional process systems, valves, gauges or equipment are required to be monitored or shut down since no potentially dangerous processes are employed at the facility.
8. All waste handling or processing in the affected area will be stopped immediately.
9. All waste feed lines and waste processing equipment will be shut down when this can be done safely. There are no continuous treatment processes. All treatment is on a batch basis. Power outages will simply make these processes inoperable.

10. In situations immediately dangerous to life and health (IDLH), evacuation of the facility may be necessary. This decision will be made by the Emergency Coordinator/Alternate or facility supervisor. If the evacuation occurs, the primary evacuation route should be used unless blocked or impassable. In that situation, the secondary evacuation route should be employed. Both routes are prominently outlined at the facility and are included with this plan.

Spill or Release Response Procedures

In the event of a spill, certain procedures must be instituted immediately.

The storage area for acidic and alkaline wastes are segregated to insure that no co-mingling of these materials will results.

All flammable/combustible materials are stored in a separate Bay.

All incompatible materials have separate containments.

Immediately contact all required individuals/agencies. These telephone numbers are posted at all facility telephones.

Should a spill or release occur, the following steps are to be taken:

1. Sound an alarm to notify an emergency.
2. Don protective equipment located in safety cabinets.
3. Contact EQ Emergency Coordinator/Alternate.
4. The source of the spill/release will be determined and corrected.
5. Waste handling or processing in the affected area will be stopped immediately.
6. All waste feed lines and waste processing equipment will be shut down as soon as this can be done safely.
7. All non-response personnel will leave the area immediately.
8. All injured persons will be removed from the area and treated by qualified medical personnel.
9. Contain the spill with either sorbent boom, sorbent pillows, or bulk sorbent material. All sorbents and booms are stored in the spill control storage area.
10. In the event of an acid spill, use calcium carbonate or lime to neutralize the spill.
11. Use citric acid to neutralize alkaline spills.
12. Once the spill has been contained, begin cleanup.
13. Contact the response contractors listed in and request mobilization of personnel or equipment, if necessary.
14. The emergency coordinator/alternate will contact all required agencies.
15. Note the discharge in the operating record.
16. A complete list of response action for specific chemical spills is included.
17. If immediate evacuation of the building is required, two 5-minute egress bottles are attached to the supplied air system. Additional respiratory and personal protective clothing are located in the safety equipment cabinet located in Bay 3 of the facility.
18. In the event that a release outside the facility leads to surface water, groundwater or

soil contamination, EQ will contact the contractors listed or other suitable contractor for all required remediation efforts.

Care of the Injured

The objective is to provide first aid or immediate care for a person who has been injured, or has been suddenly taken ill, in the event of an emergency. Implement emergency first aid as required.

All facility employees of EQ shall have been trained in standard first aid and cardiopulmonary resuscitation (CPR) programs offered and presented by the American Red Cross. First aid kits will be located in the office area.

In the event of an emergency, the EQ facility manager shall be in charge until the arrival of the Emergency Coordinator/Alternate.

All injured shall be taken to Brandon Hospital or Tampa General Hospital by the local ambulance service. These hospitals will have been notified as to the type of injuries which may result at our facility. In an emergency situation, they should be informed of the extent of the emergency and what injuries to expect. A figure designating routes to these hospitals is attached.

The nearest life squad is the City of Tampa. They can be contacted by dialing 911.

POST-EMERGENCY OPERATIONS

Decontamination Procedures

After an emergency incident, decontamination of equipment is required. All expendable items, such as sorbent, booms and so on are to be placed into 55 gallon drums and disposed as required by state and federal law. Non-expendable items such as tools, chemical suites and material handling equipment are to be cleaned in an appropriate solvent and placed back in their normal location. Disposal of the spent solvent will comply with applicable regulations.

All tanks and containerized waste will be thoroughly inspected for leaks, pressure build-up and structural integrity by the site supervisor. Any deficiencies will be immediately corrected.

Air monitoring will be performed as required to insure the facility is safe to resume normal operations.

Specific decontamination solutions/procedures are:

Inorganic/Organic Acids

Prepare mixture of 10% sodium carbonate or 10% hydrated lime or 10% trisodium phosphate in water; clean items/area with mop or cloth. Wear protective equipment.

Alkalai (Caustics)

Prepare mixture of 5% acetic acid (vinegar) or 5% citric acid in water; clean items/area with mop or cloth. Wear protective equipment.

Oils and PCB

Methylene chloride or isooctane applied directly to the contaminated area. Remove solvent and contaminant with sorbent or absorbent cloths. Wear protective equipment.

Alkalai and Alkaline Earth

Cover metals (sodium, potassium, phosphorus) immediately with dry soda ash (sodium-carbonate) and remove with broom and shovel. Keep dry; do not contact with water. Wear protective equipment.

Solvents

Cover with absorbent material as quickly as possible. Remove with broom and shovel. Wear protective equipment.

Mercury

Recover as much bulk Mercury as possible. Cover the spill area using Mercsorb, HgX or equivalent. Spray with water to activate the material. Wear protective equipment. Keep area well ventilated.

Re-Entry Monitoring

Before employees are allowed to return to the area after an emergency, the on-site Emergency Coordinator/Alternate will confirm the area is safe for re-entry. This will be accomplished by physical inspection of the area, the use of detection equipment, followed by decontamination as necessary. Chemical detection equipment available to the Emergency Coordinator/Alternate is as follows (note, these items are located in the office area):

1. Chemical detector tubes - Draeger, MSA.
2. Explosion meter.
3. Portable Organic Vapor Analyzer (OVA).
4. Portable pH/specific ion meter.
5. Hazcat Kit.
6. A fully equipped environmental laboratory is located nearby. Any wet chemical or instrumental analyses can be performed as required.

Emergency Waste Movement Coordination

In the event of an emergency situation where the movement of waste materials is required, the following procedures are to be employed:

1. Contact the emergency response coordinator or alternate.
2. Contact EQ and/or subcontract drivers.
3. Perform waste characterization verification as described in the EQ Waste Analysis Plan.
4. Contact Florida DEP- Emergency Response Group, and the District Office in Tampa to inform them of the emergency waste movement.
5. Load waste into drums, tankers, roll-off containers, or other suitable containers.
6. Load the containers to the vehicles. Follow all applicable DOT regulations pertaining to placarding, labeling, and loading.
7. Complete all shipping documents as required.
8. Dispatch waste shipments to secondary approved permitted waste treatment or disposal facilities.

Post-Emergency Assurances

No waste material that may be incompatible with any released material will be treated or stored in the portion of the facility where any release occurred until cleanup procedures are complete. All emergency equipment listed in this Contingency Plan will be cleaned and fit for its intended use before hazardous waste management operations are resumed. Inoperable emergency equipment will be serviced, repaired, or replaced.

Post-Emergency Documentation

Operating Record

EQ will note in the facility operating record the time, date, and details of any incident that requires implementing the EQ Contingency Plan.

Reporting

EQ will submit an incident report to the FDEP electronically within 15 days after any incident requiring implementation of the EQ Contingency Plan. The report will include the following information:

1. Name, address, and telephone number of EQ's contact (operator);
2. Name, address, and telephone number of EQ facility;
3. Date, time, and type of incident;
4. Name and quantity of materials involved;
5. The extent of injuries, if any;
6. An assessment of hazards to human health or the environment, if applicable, and the estimated quantity and disposition of any recovered materials which may result from the incident.

The report will be mailed to the following parties, as necessary and/or appropriate:

Assistant Fire Chief Scott Ehlers Tampa Fire Department 808 East Zack Street Tampa, FL 33602	National Response Center (NRC) c/o U.S. Coast Guard (CG-5335) - Stop 7581 2100 2nd Street, SW Washington, DC 20593-0001
Steve Morgan FDEP Southwest District Division of Waste Management 13051 North Telecom Parkway Temple Terrace, FL 33637	Richard B. Tedder FDEP Division of Waste Management 2600 Blair Stone Road Tallahassee, FL 32399-2400

In addition, the report will be submitted electronically to the FDEP Southwest District Compliance Assurance Program at SWD_Waste@dep.state.fl.us.

ATTACHMENT 1

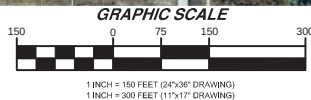
EMERGENCY SAFETY EQUIPMENT

1. Hand-Held blow Horns (4)
2. Telephones (3)
3. Emergency Lights (4)
4. Pull Alarms (6)
5. Fire Extinguishers (8)
6. Emergency Exits (7)
7. Containment Sumps (6)
8. Spill Kits (Acid, Alkaline, Solvent) (1 each)
9. Fire Hoses (3)
10. Safety Equipment Cabinets (2)
11. UV Smoke and Flame Detectors (6)
12. Heat Sensors (2)
13. LEL Sensors (2)
14. LEL Meter (1)
15. SCBA Respirator (1)
16. Eye Washes (3)
17. Safety Shower (1)
18. Sprinkler Systems (2)
19. Foam System (1)
20. Intrusion Alarm System (1)
21. Fire Alarm System (1)

FIGURES



SOURCE:
1. http://data.lbins.org/2003/MappingData/DOQQ/hi-res_search.cfm

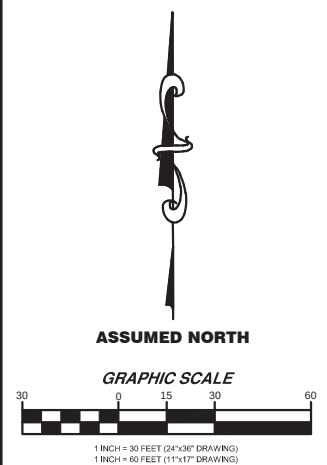
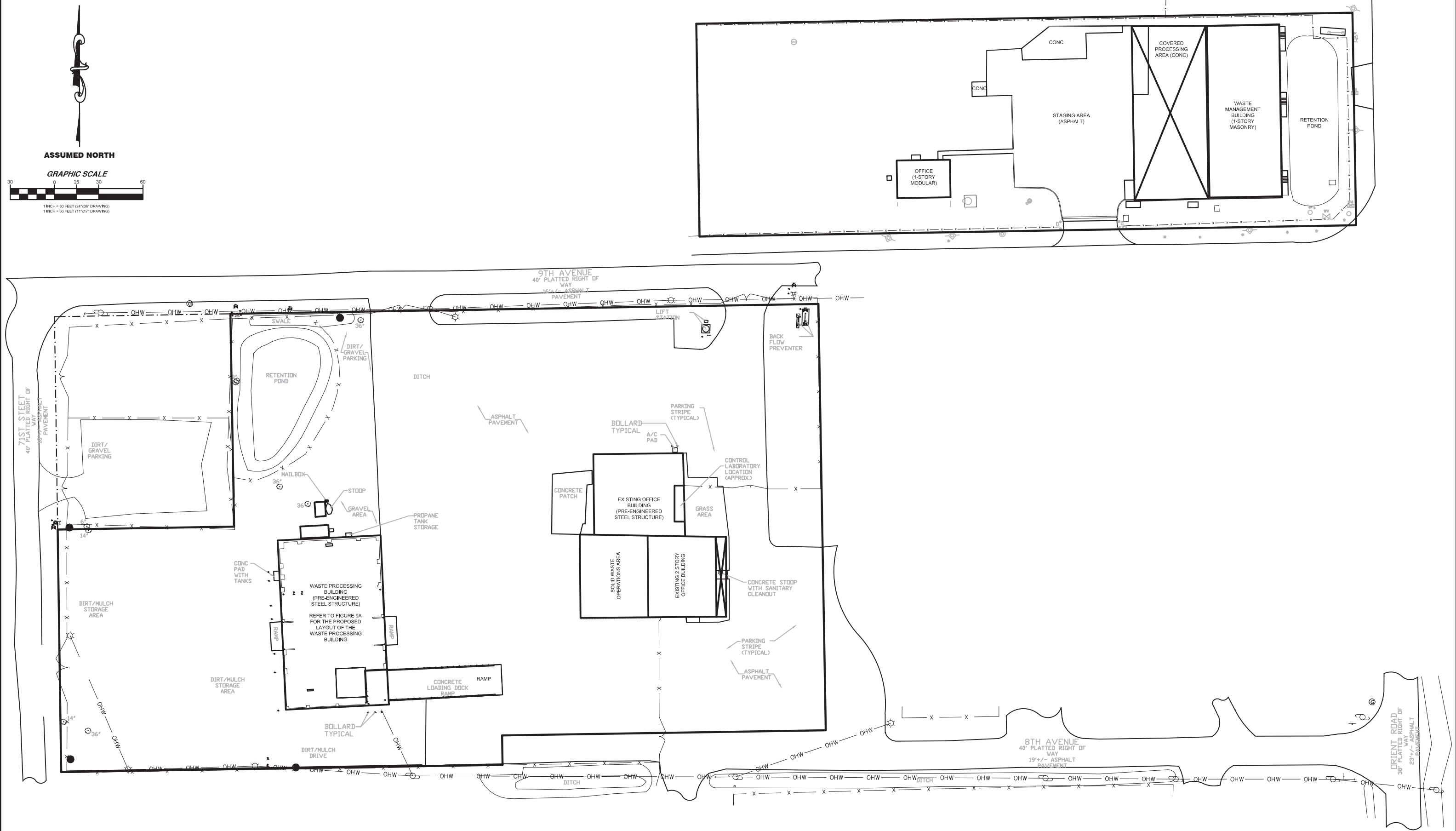


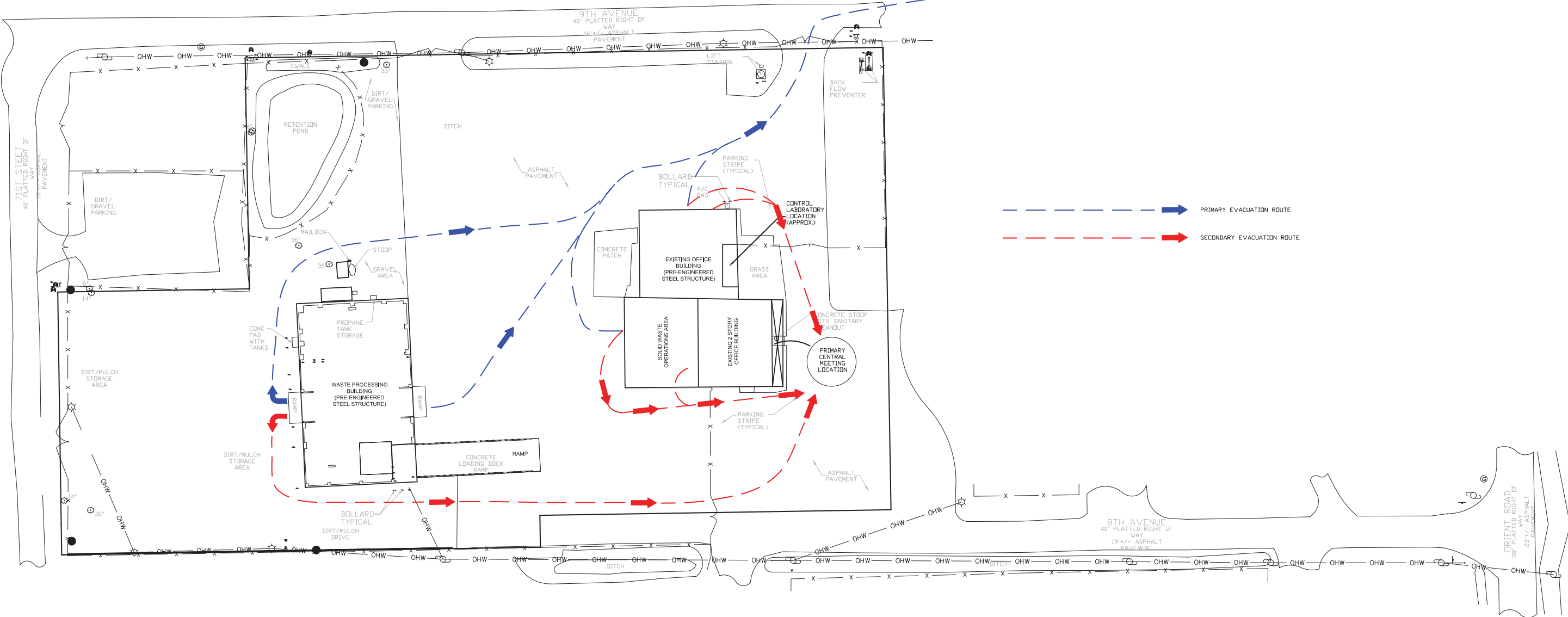
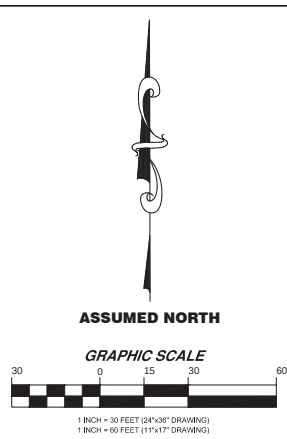
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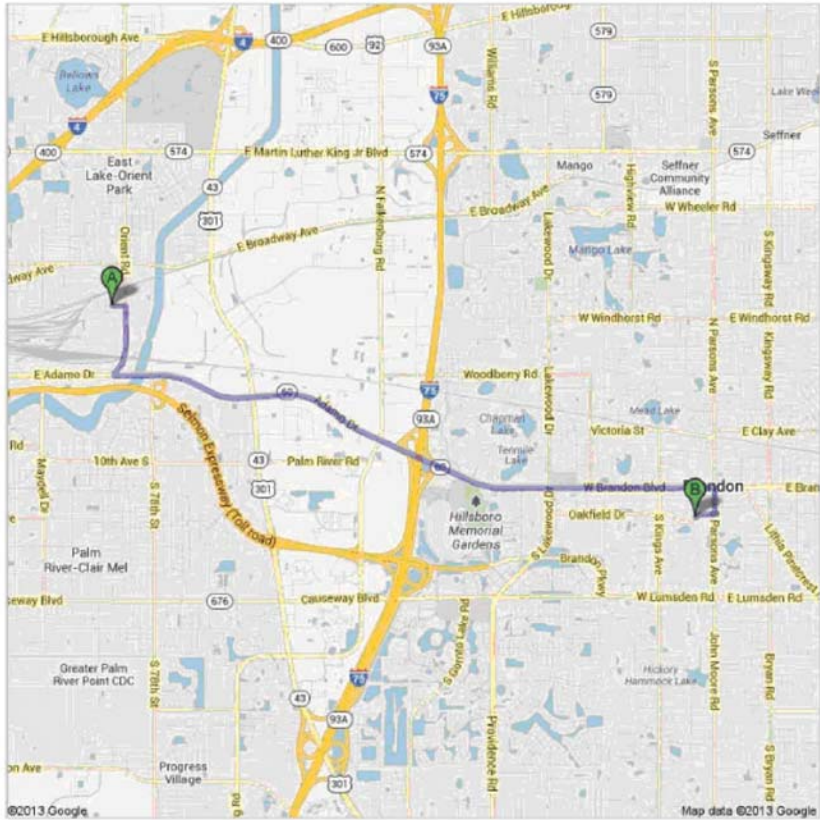
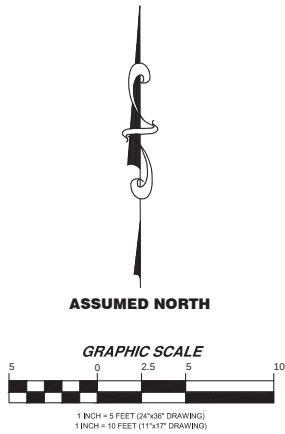


KCI TECHNOLOGIES
ENGINEERS, SURVEYORS AND PLANNERS
LICENSED BUSINESS 6901
10401 HIGHLAND MANOR DRIVE, SUITE 120
TAMPA, FL 33610
PHONE (813) 740-2300 * FAX (813) 740-0159

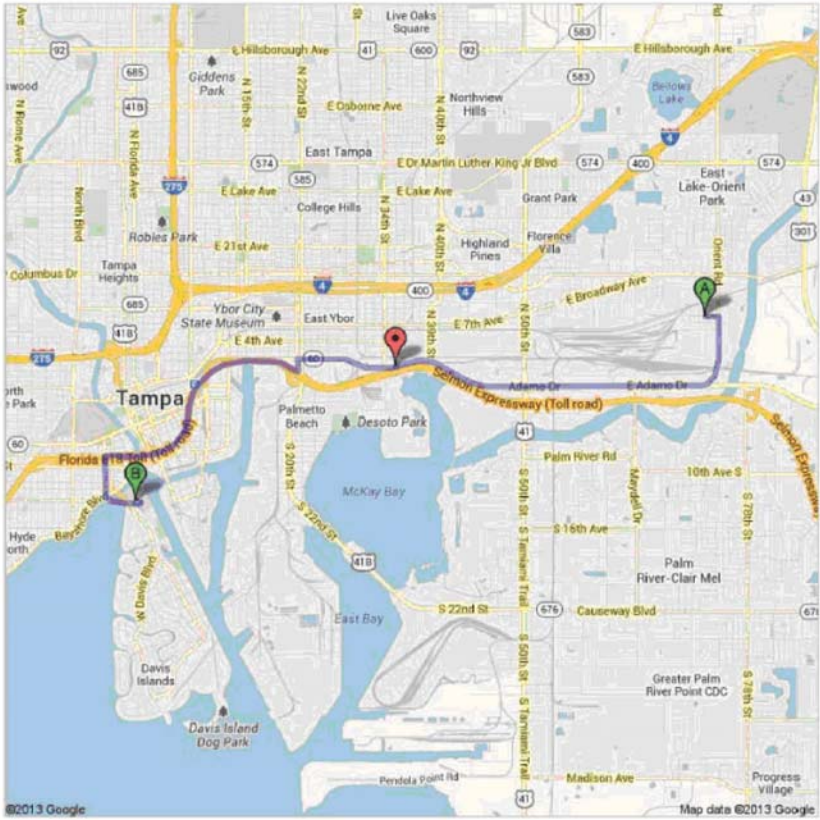
SITE AREA/LOCATION MAP			
FOR			
EQ FLORIDA, INC.			
DATE	SCALE	SHEET	
MAY 22, 2013	1" = 150'	3 OF 15	







A 7202 E 8th Ave, Tampa, FL 33619		
1. Head east on E 8th Ave toward N 72nd St	go 0.1 mi	total 0.1 mi
2. Turn right onto Orient Rd	go 0.7 mi	total 0.8 mi
3. Turn left onto FL-60 E/E Adamo Dr	go 5.7 mi	total 6.5 mi
4. Turn right onto S Parsons Ave	go 0.2 mi	total 6.7 mi
5. Take the 2nd right onto Oakfield Dr	go 0.2 mi	total 6.9 mi
Destination will be on the left		
B Brandon Regional Hospital		
119 Oakfield Dr, Brandon, FL 33511		



A 7202 E 8th Ave, Tampa, FL 33619		
1. Head east on E 8th Ave toward N 72nd St	go 0.1 mi	total 0.1 mi
2. Turn right onto Orient Rd	go 0.6 mi	total 0.8 mi
3. Take the 3rd right onto E Adamo Dr	go 3.8 mi	total 4.6 mi
4. Turn left onto N 21st St	go 495 ft	total 4.7 mi
5. Turn right onto the Florida 618 West Toll ramp to St Petersburg	go 0.3 mi	total 4.9 mi
6. Merge onto Selmon Expressway	go 1.8 mi	total 6.7 mi
7. Take exit 5 toward Hyde Park Ave/Davis Islands	go 0.2 mi	total 6.8 mi
8. Merge onto W Brorin St	go 381 ft	total 6.9 mi
9. Turn left onto S Hyde Park Ave	go 0.3 mi	total 7.2 mi
10. Take the exit toward Tampa General Cir	go 0.2 mi	total 7.4 mi
11. Keep left at the fork, follow signs for Tampa General Hospital	go 0.1 mi	total 7.6 mi
12. Keep left at the fork, follow signs for Emergency/Physician Parking and merge onto Tampa General Cir	go 194 ft	total 7.6 mi
13. Turn left to stay on Tampa General Cir	go 85 ft	total 7.6 mi
14. Turn left to stay on Tampa General Cir	go 233 ft	total 7.7 mi
Destination will be on the right		
B Tampa General Hospital		
1 Tampa General Cir, Tampa, FL 33606		

APPENDIX E

CLOSURE PLAN

CLOSURE PLAN

EQFL plans to operate the solid waste facility as long as economically and environmentally possible. There are currently no plans to stop solid waste management activities or close the facility. However, in keeping with 62-701.710(6), F.A.C., this Closure Plan has been prepared to plan, prepare, and secure financial assurances so that closure could be completed if required.

EQFL shall notify the FDEP in writing prior to ceasing operations, and will specify a closing date. The facility will receive no more solid waste after the stated closing date. Within 30 days after receiving the final solid waste shipment EQFL shall remove or otherwise dispose of all solid waste or residue in accordance with 62-701.710(6)(a), F.A.C.

Closure will be completed within 180 days after receiving the final waste shipment. Closure will include removal of all recovered materials from the site, the proper decontamination of site equipment and proper disposal of waste rinsate produced during decontamination. When closure is completed, EQFL will certify in writing to the FDEP that closure is complete. The FDEP will make an inspection within 30 days to verify the closure and advise EQFL of the closure status.

Closure and closure cost estimates are based upon a third party completely managing and conducting all closure activities. No post-closure care is required. Closure activities include the removal of all non-RCRA regulated solid wastes from the facility. Removal will be by shipment to treatment and disposal facilities.

A third party Florida Professional Engineer will perform closure certification to the Department.

Equipment and Storage Area Cleaning

Roll-offs, sludge boxes, and dump trailers use disposable liners; therefore, no cleaning will be required. Disposal of these liners would occur. Forklifts, drum handlers, most box trailers and box vans, drum scales, and air compressors do not contact waste and, therefore, do not require cleaning. Diaphragm pumps, drum pumps, the sand filter, and the carbon filter require a simple flush or backwash. The decontamination of these items would produce rinsate that would be properly disposed of offsite.

All items that contact waste would require cleaning and decontamination. These items would be cleaned with a pressure washer and all waste rinsate would be properly disposed of offsite as well. These items include the shredder, tanker, vacuum trucks, skid mount tanks, backhoe/loader, solidification unit, and oil-water separator tank. Any used oil remaining in the oil-water separator tank would be disposed of off-site prior to cleaning of the tank. A pressure washer and suitable cleaning solution would be employed to clean floors/pavements and sumps at the site. The areas where waste rinsate would be generated include the Waste Processing Building and the Staging Area on the Orient Road property. These waste rinsate generated from cleaning these areas would be properly disposed of offsite. To determine the associated toxicity of the liquid waste, samples would be collected and analyzed before removal from the site. To provide a worst-case scenario for closure cost estimating, the total inventory at the site has been assumed to be liquid waste.

These decontamination procedures are required to create safe equipment that can be used again following closure and would be performed by appropriate personnel before the equipment is removed from the site.

Closure Certification

Third-party closure certification will be provided by a Florida registered professional engineer at an estimated fee of \$1,500.

Closure Costs

Total closure cost for the EQFL Solid Waste Processing Facility is estimated at \$101,167 including all sampling, analysis, loading, transportation, disposal, cleaning, labor, and certification costs. A contingency representing 10 percent of all calculated closure costs is also included in this total closure cost estimate. A closure plan cost summary is provided on the following table and copies of supporting third-party quotes are attached. Inflationary increases, as approved by the FDEP, may be made to this cost estimate annually.

CLOSURE PLAN COST SUMMARY

LABOR COSTS

Operational Area	Capacity in Gallons	Square Footage	Rinsate Generated	Labor Hours	Labor Cost @ \$40/hr
Pumps and Filters			280	6	\$240
Vehicles and Equipment			3,000	30	\$1,200
Staging Area ^{1, 2}	35,200	9,158	4,579	41	\$1,640
Waste Processing Building ^{1, 2}	173,532	8,050	4,025	36	\$1,440
Solid Waste Operations Area ^{1, 2}	20,200	2,288	0	0	\$0
Oil-Water Separator Tank ^{1, 2}	6,000	503	251	2.0	\$80
	234,932	19,999	12,135	115.0	\$4,600

WASTE ON-SITE

	gallons (solids) ³	gallons (liquids) ³	
	0	234,932	
	tons ⁴	hours labor	labor cost @ \$40/hr
Bulk roll off loading @ 1 hr labor / 20 tons loaded	0	0	\$0

ANALYTIC COSTS

	tons ⁴	# samples	Sample cost @ \$575/sample
Solid composite sample @ 1 sample / 110 tons	0	0	\$0
	gallons	# samples	Sample cost @ \$650/sample
Liquid composite sample @ 1 sample / 20,000 gallons	247,067	12	\$7,800

Total Analytical Cost = \$7,800

TRANSPORTATION AND DISPOSAL COSTS

	tons	cost
T & D of solids @ \$30 / ton	0	\$0
	gallons	cost
T & D of Liquids @ \$0.30/gallon (234,932 gallons + 12,135 gallons rinsate)	247,067	\$74,120

Total T & D Cost =	\$74,120
Equipment Rental =	\$250
Mobilization & Demobilization =	\$3,700
Closure certification =	\$1,500
Sub-Total Closure Cost =	\$91,970
10% contingency =	\$9,197
Total closure Cost =	\$101,167

ASSUMPTIONS

¹ Rinsate is based on generating 0.5 gallons per square foot.

² Labor hours are based on cleaning 225 square feet per hour.

³ For worst-case scenario, the total inventory is assumed to be all liquid.

⁴ Tons= (waste gallons) X (8.34 lb/gallon)/(2000 lb/ton)



Environmental Conservation Laboratories, Inc.

10775 Central Port Drive
Orlando, Florida 32824
(407) 826-5314 phone
(407) 850-6945 fax
NELAP #E83182

4810 Executive Park Ct, Suite 111
Jacksonville, FL 32216-6069
(904) 296-3007 phone
(904) 296-6210 fax
NELAP #E82277

102-A Woodwinds Industrial Court
Cary, NC 27511
(919) 467-3090 phone
(919) 467-3515 fax
NELAP #E87610

www.encolabs.com

October 31, 2013

KCI Technologies
10401 Highland Manor
Suite 120
Tampa, FL 33610

Re: Priority Pollutant Scan

Attention: Chris Poole

Environmental Conservation Laboratories, Inc. is pleased to submit the following quotation for analytical services.

Sampling Supplies/Shipping Requirements

Shipping containers and bottles will be supplied by Environmental Conservation Laboratories, Inc. Samples must be iced from time of collection until received at the laboratory. Some analyses require special sample handling – please contact your Project Manager at the laboratory if you have any questions upon receipt of containers.

Quality Assurance

All of our facilities are accredited by NELAP and also maintain additional state certifications and approvals throughout the Southeast and Mid-Atlantic regions. Unit pricing includes adherence to and documentation of compliance with applicable Quality Assurance/ Quality Control protocols for each procedure performed. Our Quality Assurance/ Quality Control program ensures acceptable accuracy and precision for each analytical method. All published data is defensible, with quality control results provided with every report.

Analytical Requirements and Unit Pricing

Environmental Conservation Laboratories, Inc. anticipates receiving samples from KCI Technologies from the proposed Priority Pollutant Scan project in the near future. These samples will be analyzed for the parameters listed in the Analytical Requirements and Unit Pricing section below.

Qty	Matrix	Method, Parameter	Fee per Sample	Total
15	Water	Priority Pollutant Volatiles by 8260	\$85.00	\$1,275.00
15	Water	Priority Pollutant Semivolatiles by 8270	\$190.00	\$2,850.00
15	Water	Low-Level PAH's	\$75.00	\$1,125.00
15	Water	Priority Pollutant Pesticides/PCB's by 8081/8082	\$120.00	\$1,800.00
15	Water	Priority Pollutant Metals by (13)	\$110.00	\$1,650.00
15	Water	Cyanide	\$35.00	\$525.00
15	Water	Phenols	\$35.00	\$525.00
15	Soil	Priority Pollutant Volatiles by 8260	\$85.00	\$1,275.00
15	Soil	Priority Pollutant Semivolatiles by 8270	\$190.00	\$2,850.00
15	Soil	Priority Pollutant Pesticides/PCB's by 8081/8082	\$120.00	\$1,800.00
15	Soil	Priority Pollutant Metals by (13)	\$110.00	\$1,650.00
15	Soil	Cyanide	\$35.00	\$525.00
15	Soil	Phenols	\$35.00	\$525.00
TOTAL				\$18,375.00

Comments / Special Considerations:

Above pricing includes a standard 5 business day turnaround and an electronic deliverable.

Quote Expiration Date: November 7, 2013

This quote shall expire 120 days from the above date.

Terms and Conditions:

The information contained in this proposal is confidential and shall not be used or disclosed to any third party without prior written permission from Environmental Conservation Laboratories, Inc. In the absence of a written agreement, acceptance of samples is in accordance with Environmental Conservation Laboratories, Inc.'s attached Standard Terms and Conditions of Sale. All payment is due net thirty (30) days from invoicing date unless special arrangements have been requested and approved by ENCO.

Reporting Format

A final report summarizing all data and Quality Assurance/Quality Control results will be forwarded no later than one (1) day following completion of analyses. Additionally, ***numerous electronic reporting options are available*** – contact your Project Manager for details.

ENCO's standard Hardcopy Report includes the following minimum information:

- Date of Sample Collection/Receipt/Extraction/Analysis
- Analytical Data
- Matrix Spike/Matrix Spike Duplicate Recoveries
- Laboratory Check Sample Recoveries
- MS/MSD Relative Percent Differences
- Laboratory Blank Data
- Surrogate Recoveries
- Original Chain-of-Custody

Sample Disposal/Invoicing

Samples will be disposed of thirty (30) days after the report date, unless prior arrangements have been made with the laboratory. Samples will be held longer, upon request, on a fee per month basis.

To ensure successful completion of your project, I urge you to communicate any changes in the scope of work (i.e., methods, project start up dates, numbers of samples, matrices, etc.) to either myself or the laboratory as soon as possible. Should you require further information, please do not hesitate to contact me at 813-992-1291.

Sincerely,
ENVIRONMENTAL CONSERVATION LABORATORIES, INC.

Joanne Hayden
Account Manager



**901 McClosky Blvd.
Tampa, FL 33605
813-241-0282 FAX 813-241-6765**

July 11, 2013

Stuart Stapleton
EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619-

RE: Closure rates.

Dear Mr. Stapleton,

SWS Environmental Services is pleased to submit the following proposal for the Scope of Work described herein, along with our standard Terms & Conditions. We appreciate the opportunity to bid on this project and are prepared to perform the work upon your approval of the Proposal.

Job Summary

SWS Environmental Services will provide an hourly rate for a Technician plus transportation and disposal costs for Non Hazardous waste water. (rates are contingent on profile approval and water being designated for WWT)

Description	Rate	Quantity	Unit	Total
Field Technician	\$40.00	1	Hour	\$40.00
Transportation & Disposal of Non Hazardous Waste Water (3000g Min)	\$0.30	3000	Gallon	\$900.00
			Total:	\$940.00

Terms & Conditions:

SWS Environmental Services will meet with the customer prior to start of work to review all aspects of the health & safety and compliance. Personnel will be required to wear the appropriate level of personal protection (if required).

The customer acknowledges that the estimated cost is based on an agreed upon scope as appraised by the SWS Environmental Services representative, and that the amount invoiced by SWS Environmental Services will be based upon the labor, equipment, materials, disposal, fees actually expended in performing the scope of work. Any changes in the scope will be billed a time & materials basis, and for actual disposal units if applicable.

Where changes to the original scope become necessary, SWS Environmental Services will promptly notify the customer and obtain the necessary authorization to proceed. In doing so, a revised price will be established in order to complete the project as originally scoped.

This quotation is contingent on the Customer providing reasonable access to the site and that the Customer represents and warrants to SWS Environmental Services that they have the legal right, title and interest necessary to provide access to the site. In addition, the Customer warrants that it has supplied SWS Environmental Services with complete and accurate information regarding documentation and/or information concerning the scope of work

Applicable Federal, State, County, Parish and local sales tax and fees will be charged as appropriate. Taxes and fees are not included in the quoted prices but will be included at time of invoicing.

This quotation is submitted contingent upon the right to negotiate mutually acceptable terms and conditions which are reflective of the work contemplated, and an equitable distribution of the risks involved therein. In the event that such an agreement cannot be reached, SWS Environmental Services reserves the right to decline to enter into such an agreement without prejudice or penalty.

SWS Environmental Services guarantees to hold these prices firm for thirty (30) days from the date of the quotation. SWS Environmental Services's standard payment terms are net fifteen (15) days.

For projects lasting longer than 7 calendar days or where waste disposal is part of the job, we reserve the right to partial invoice.

SWS Environmental Services has standard work hours of eight (8) hours in a normal workday Monday through Friday. Any work performed in excess of eight (8) hours outside the customary work hours and on Saturdays is considered overtime and will be invoiced at time and a half of the applicable straight time rate. Work performed on Sundays and Holidays are considered premium and will be billed at twice the applicable straight time rate.

SWS Environmental Services customary work hours are 7:00 a.m. to 3:00 p.m.

A fuel recovery charge has been incorporated into this lump sum/fixed price quote. We reserve the right to adjust pricing for services provided beyond thirty (30) days from quote date if the cost of fuel varies significantly.

All waste must be profiled and acknowledged by the customer.

Disposal pricing based upon waste specifications. Transportation and disposal will be based on actual volumes with stated minimums at quoted unit rates.

Labor and equipment will be invoiced portal-to-portal and based on actual quantities incurred.

Pricing for waste is upon disposal facility acceptance. Off-spec charges and/or surcharges will be priced accordingly.

The quote is based on the stated assumptions and site conditions. Any work that falls outside the assumptions will constitute work beyond the intended scope and be completed upon mutually satisfactory terms.

Waste volumes are an estimate only, customer will be charged for actual quantities.

Work interruptions or delays caused by acts or omissions out of the control of SWS Environmental Services will be charged to the customer.



We appreciate the opportunity to submit this proposal. If you have any questions or require additional information, please contact me at the phone number or address below. If you accept this proposal, please sign and return to SWS Environmental Services.

Respectfully,

Mike Bevacqua

Mike Bevacqua
Service Center Manager
901 McClosky Blvd.
Tampa, FL 33605
813-241-0282

AGREED: EQ Florida, Inc.

By: _____

Date: ____/____/____

Cc: Stacie Cooper, Bus Dev Rep

APPENDIX F

PROOF OF PUBLICATION OF NOTICE

Proof of publication of notice will be provided to the Department after receipt of notice of the Department's intended action.

APPENDIX G

ENFORCEMENT ACTION SUMMARY

EQ Florida Compliance History

DATE	AGENCY	NOTICE	PERMIT #	ALLEGED VIOLATION	STATUS
3/2/2000	FDEP	N/A	34875-HO-007	Minor Training Infractions	Corrected
12/20/2000	FDEP	N/A	34757-001-SO	None	
1/24/2000	FDEP	N/A	34757-001-SO	None	
8/25/2000	FDEP	N/A	34757-001-SO	None	
5/3/2000	FDEP	N/A	34757-001-SO	None	
4/18/2001	FDEP	N/A	34757-001-SO	None	
8/23/2001	FDEP	N/A	34757-001-SO	None	
7/24/2000	FDEP	N/A	34875-HO-007	None	
1/29/2001	FDEP	N/A	34875-HO-007	None	
2/27/2002	FDEP	N/A	34757-001-SO	None	
8/13/2002	FDEP	N/A	34757-001-SO	None	
4/17/2002	FDEP	N/A	34875-HO-007	None	
9/23/2003	FDEP	NOV	34875-HO-007	Failure to determine if the total halogen content of 880-gallons of used oil was above or below 1,000-PPM prior to acceptance and transport. Failure to comply with 49 CFR 171.2(a) by accepting a hazardous material for transport that was not properly classed, described, marked, labeled, etc.. Failure to obtain authorization prior to disposal or treatment of contaminated used oil.	Corrected
10/23/2003	FDEP	N/A	34757-003-SO	None	
1/28/2004	FDEP	N/A	34875-HO-007/34757-003-SO	None	
4/13/2004	FDEP	N/A	34757-003-SO	None	
8/10/2004	FDEP	N/A	34757-003-SO	None	
1/28/2005	FDEP	N/A	34757-003-SO	None	
3/30/2005	HEPC	N/A	34757-003-SO	None	
4/15/2005	FDEP	N/A	34757-003-SO	None	
7/14/2005	FDEP	N/A	34875-HO01 -002	None	
8/23/2005	FDEP	N/A	34757-003-SO	None	
4/27/2006	FDEP & EPA	NOV	34875-HO-007	Failure to perform a hazardous waste determination on the electronic waste before disposal into the non-hazardous waste container. (corrected) Failure to operate the facility in a manner that minimizes the possibility of a release of hazardous constituents which could threaten human health or the environment. (Residual waste was observed on the lid of a drum of waste in the container storage building and residual waste was observed on a pain can hopper) Failure to submit a complete Biennial Report for the year 2005. Failure to send revised Contingency Plan to the department and Emergency Agencies. Failure to keep containers of hazardous waste closed except when adding to or taking material from the container. (corrected) Failure to properly label containers of spent mercury containing lamps.(corrected)	Corrected
6/1/2006	HEPC	N/A	34757-003-SO	None	
9/15/2006	FDEP	N/A	34757-003-SO	None	
10/31/2006	FDEP	N/A	34757-003-SO	None	
2/6/2007	HEPC	N/A	34757-003-SO	None	

EQ Florida Compliance History

DATE	AGENCY	NOTICE	PERMIT #	ALLEGED VIOLATION	STATUS
2/8/2007	FDEP	N/A	34757-003-SO	None	
3/23/2007	FDEP	NOV	34875-HO01-009	Failure to document corrective actions on daily facility inspection log. Failure to properly clean-up broken lamp near paint crusher. (corrected)	Corrected
6/19/2007	HEPC	N/A	34757-003-SO	None	
11/2/2007	FDEP	N/A	34757-003-SO	None	
3/6/2008	FDEP	N/A	34757-003-SO	None	
03/17/08	FDEP	NOV	34875-HO01-009	Failure to label eight one cubic yard boxes with accumulation start dates. (corrected). Failure to label eight one cubic yard boxes with the words "Hazardous Waste." (corrected) Failure to ensure containers are in good condition. (corrected)	Corrected
05/14/08	FDEP	N/A	34757-003-SO	None	
11/04/08	FDEP	N/A	34757-003-SO	None	
02/12/09	HEPC	N/A	34757-006-SO/30	None	
04/24/09	FDEP	N/A	34757-006-SO/30	None	
07/30/09	FDEP	NOV	34875-HO01-009	During the inspection, a box storing universal waste lamps were observed in the box truck that was not properly closed. (corrected immediately after inspection)	Corrected
09/30/09	FDEP	N/A	34757-006-SO/30	None	
10/14/09	FDEP	Consent Order	FLR05E179	Alteration of a Stormwater Management system prior to receiving regulatory authorization	Settlement Agreement
02/18/10	FDEP	N/A	34757-006-SO/30	None	
03/22/10	USDOT	N/A	-	Failure to close a package in accordance with the manufacturers instructions. Bill of Lading not completed correctly.	Letter of Warning
05/14/10	US Customs and Border Protection	N/A	P330-08-00259	None	
05/26/10	FDEP	N/A	34757-006-SO/30	None	
06/14/10	US Customs and Border Protection	N/A	P330-08-00259	None	
08/24/10	FDEP	NOV	34875-HO01-009	Containers located within 15 meters (50 feet) of the property line. Improper storage of universal waste lamps. Residue on outside of drums. Cyanide bearing waste stored improperly. Improper container marking. Failure to properly inspect the safety cabinets. Failed to properly close containers. Improper waste segregation. Improper container storage. Failure to park vehicles on a man made surface having emergency liquid containment. Failed to label used oil dolly with the words "Used Oil". Failed to mark containers with all applicable EPA waste codes and generator information.	See 04/19/11 Inspection
11/08/10	FDEP	N/A	34757-006-SO/30	None	

EQ Florida Compliance History

DATE	AGENCY	NOTICE	PERMIT #	ALLEGED VIOLATION	STATUS
04/19/11	FDEP & EPA	NOV	34875-HO01-009	Failed to label used oil dolly with the words "Used Oil". Failed to labe containers with the words "Universal Waste Batteries". Failed to properly close containers. Failed to record the date and nature of corrective actions or repairs in the daily inspection log. Failed to mark containers with all applicable EPA waste codes and generator information. Storing hazardous waste outside the permitted storage building. Failed to properly complete manifests. Residue on outside of drums. Aerosol can emptying device not in compliance with Subpart CC regulations. Improper storage of universal waste lamps. Improper waste segregation. Improper waste inventories and daily inspections. Universal waste improperly packaged.	Consent Order Closed
06/28/11	FDEP	N/A	34757-006-SO/30	None	
10/11/11	FDEP	N/A	34757-006-SO/30	None	-
02/01/12	FDEP	N/A	34757-006-SO/30	None	
02/09/12	DOT PHMSA	NOV		Offering for transportation in commerce, a hazardous material, UN 1950 Waste Aerosols, 2.1, while failing to comply with the terms of a special permit authorizing use of a nonstandard packaging, in violation of 49 CFR 171.2 (a), (b), (c), (e), (f), & (i), 173.22, 173.22a and DOT-SP 11296. Offering for transportation in commerce, a hazardous material, UN 1950 Waste Aerosols, 2.1, while failing to list a special permit with the shipping description, in violation of 49 CFR 171.2 (a), (b), (c), (e), (f), & (i), and 172.203(a)	Closed
05/17/12	FDEP	N/A	34757-006-SO/30	None	
09/19/12	FDEP	NOV	34875-HO01-009	Two boxes of universal waste lamps were open, and not labeled. (Corrected)	-
03/26/13	FDEP	N/A	34757-006-SO/30	None	-
05/22/13	FDEP	N/A	34875-HO01-009	None	-
05/22/13	FDEP	N/A	34757-006-SO/30	None	-

APPENDIX H

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

FOR

EQ FLORIDA, INC.

2002 North Orient Road
Tampa, Florida 33619

FLD 981932494

CONTENTS OF WASTE ANALYSIS PLAN

1.0	Introduction	Page 3
2.0	Pre-Acceptance Procedures	Page 4
3.0	Sampling Methods	Page 10
4.0	Analytical Rational & Procedures	Page 12
5.0	Incoming Waste Shipment Procedures	Page 18
6.0	Operational Procedures	Page 21
7.0	Quality Control Policy	Page 21
8.0	Lab Pack Acceptance and Handling Procedures	Page 22
9.0	Attachments	

EQFL WASTE ANALYSIS PLAN

1.0 INTRODUCTION

In accordance with the regulatory requirements set forth in 40 CFR 264.13 (b) and 40 CFR 268.7, EQFL has developed this Waste Analysis Plan (WAP). The procedures set forth in this plan ensure that this facility will be in compliance with all the requirements of 40 CFR 264.13 and 268.7. A copy of the current plan will be available at the facility.

The purpose of this Waste Analysis Plan (WAP) is to identify and document the necessary sampling methods, analytical techniques and overall procedures that are undertaken for hazardous wastes that enter this facility for treatment or storage. The plan describes the following:

1. Pre-Acceptance Procedures

Used to determine the acceptability of a particular waste stream pursuant to facility permit conditions and operating capabilities prior to shipment of that waste to the facility.

2. Incoming Waste Shipment Procedures

Used to identify that the delivered waste shipment matches the accompanying manifest, as well as the pre-acceptance description (the profile), and the conditions of the facility permit.

3. Sampling Methods

Used to ensure that adequate quality control (QC) waste identification samples are properly obtained.

4. Analytical Techniques

Used to verify that the waste received at the facility conforms to the properties and characterization approved on the waste profile form so that the appropriate treatment or storage techniques can be utilized.

5. Operational Procedures

Used to maintain safe and appropriate methods of storage, treatment and ultimate outbound shipment of wastes.

All RCRA-regulated wastes treated or stored at the facility will be handled in accordance with the Waste Analysis Plan (WAP) procedures. Non-RCRA regulated waste is, by definition, not regulated by RCRA. Non-RCRA regulated waste will be managed at the facility. This will not interfere with the management of hazardous waste at the facility. It is EQFL's policy to screen non-RCRA regulated waste for hazardous characteristics utilizing the EQFL WAP. This is to ensure that the facility will be in compliance with all applicable permits and regulations to properly, safely manage all waste.

All forms shown within this WAP are typical forms currently used by the facility. These forms may change or be updated to equivalent forms as regulations, customer needs, operations or company policy dictates. Updated copies of all forms outlined in this plan will be provided to the FDEP as these are put into use by the facility.

2.0 PRE-ACCEPTANCE PROCEDURES

EQFL has developed procedures to determine the acceptability of specific wastes for management at the facility in accordance with safe storage, treatment and all prohibitions on Land Disposal (40 CFR Part 268). The pre-acceptance procedures dictate what information a potential customer will provide to enable EQFL to determine

the acceptability of the waste for treatment, storage and ultimate off-site disposal.

The Pre-Acceptance Procedure is the mechanism for deciding to reject or accept a particular type of waste, prior to its shipment to the facility, based upon the conditions or limitations of existing permits, applicable land disposal restrictions and its compatibility with other wastes being treated and stored, at the facility. EQFL operations, technical, and field personnel are trained annually in completing waste profiles, DOT regulations (hazard classes, shipping names, and more) manifesting, and Land Disposal Restrictions (LDR).

The procedures listed below are utilized to review information and approve or reject waste prior to delivery to the facility.

1. The generator will provide EQFL with a completed Waste Profile form. A copy of the current EQFL Waste Profile is included as Attachment 1. The completed profile provides the following information:
 - a. General Information
 - b. Physical Characteristics
 - c. Chemical/Physical Composition
 - d. Characteristic Constituents
 - e. Reactivity & Other Hazards
 - f. Hazardous Characterization
 - g. Shipping Information
 - h. Certification

At a minimum, the generator supplies all the information needed to treat, store, or dispose of the waste as required by 40 CFR Part 264.13(a)(1).

2. The generator will provide EQFL with a representative sample, if requested. A copy of the current EQFL Sample Chain of Custody form is included as

Attachment 3.

3. The generator will provide EQFL with other supporting documentation, which may include Material Safety Data Sheets (MSDS), laboratory analysis, and any information concerning Land Disposal Restrictions (LDR) of 40 CFR Part 268. A completed Land Disposal Restriction (LDR) form will describe the LDRs that apply to the waste. A copy of the current Land Disposal Restrictions form is included as Attachment 2. This form was recently updated to include the new Phase IV LDR regulations.

4. EQFL will review information presented on the Profile, Toxicity Characteristic (TC) Certification, analytical data supplied by the generator, MSDSs, and other applicable documentation as supplied by the generator for:

- Completeness

- Process producing waste

- Chemical constituents of waste

- Analytical results (minimum TC certification)

- Land Disposal Restrictions requirements

5. EQFL will determine the acceptability of the waste based on:

- The permit conditions for the facility

- Facility operational requirements

- The compatibility of the waste being consolidated or treated

- The status of waste under current Land Disposal Restrictions

- The available on-site treatment capabilities

- The available off-site recycling, reclamation, treatment or disposal options

6. The pre-acceptance evaluation will be re-certified at minimum biennially. Re-certification or pre-acceptance evaluations will be done when any of the following

occur:

Biennially (every two years)

Waste Generation Process Changes

Waste Analyses or Screening Changes

Regulatory Changes Related to Waste Analysis

7. EQFL may perform necessary annual analysis, dependent on the particular waste stream characteristics, from a representative sample of the waste received to ensure that the initial analysis is accurate and up-to-date.
8. Samples may be requested when the situation is warranted, such as for waste requiring treatment by solidification in order to perform solidification evaluation testing.

Note-Laboratory Packaged (Lab Pack) waste is the exception to the above procedures. Lab pack procedures are discussed in the lab pack section of the WAP.

EQFL Technical Services

Approval chemists (or equivalent) are responsible for the pre-acceptance evaluation decision (i.e., whether to accept for storage, treatment, and off-site disposal or reject the waste). The approval chemist or coordinator reviews the profiles for general information, physical characteristics, chemical/physical composition, characteristic constituents, reactivity/other hazards, hazardous characterization, shipping information, and certifications. The chemist or coordinator also reviews the process producing the waste, waste description, EPA waste code identifications, and chemical constituents to determine the facility's ability to safely and properly manage the waste for storage, treatment, and ultimate disposal.

Problems with the profile sheet form encountered during the evaluation process, such as EPA waste codes that do not correspond with the process producing waste statement, chemical constituents that do not correspond with analytical data supplied, or analytical data that does not confirm treatment standards have been met for land disposal restricted waste (when applicable), are noted by approval personnel. An attempt to resolve discrepancies will be made by contacting the generator for additional information, documentation or analytical data. Discrepancies that cannot be resolved will result in the rejection of the waste profile. A Technical Services Manager or equivalent is available to review approval and rejection decisions if necessary.

The pre-acceptance evaluation is concluded with the final decision regarding the acceptability of the waste. Storage, treatment and disposal decisions are based on (but not limited to):

- Conditions or limitations of existing permits and regulations
- Capability to safely manage the waste
- Regulatory requirements
- Results of compatibility evaluation or treatability tests (as appropriate)
- Management decision

Waste Characterization

Indicated below are the waste characterizations of the various waste streams managed at the treatment/storage and transfer facilities. Actual waste analysis information (if available), waste profile information, supporting lab analytical, QC lab reports, manifests, land ban forms, and the EQFL computer data base information will be retained as part of the facility operating record.

Flammable Liquids

Physical State: Liquid

Flash Point: <140 F

Chemical Composition: Solvents, paints, thinners, alcohols, fuels, oils, etc.

Other Data: Facility warehouse storage is in an explosion-proof designed area.

Vehicles are placarded and meet all DOT requirements.

Disposal is off-site via fuel blending and/or incineration.

Oxidizers/Reactives/Flammable Solids

Physical State: Liquid/Solid/Semi-Solid

Chemical Composition:

Oxidizers: permanganates, nitrates, nitrites, perchlorates, etc.

Reactives: Cyanides, sulfides, and water-reactive metals

Flammable Solids: Water-reactive metals, phosphorous, paint sludges,
and solid residues.

Other Data: Cyanides and sulfides must be kept separate from acids. Oxidizers must be kept separate from organics. Flammable solid/water reactives must be kept dry and usually immersed in kerosene.

Disposal is off-site via deactivation or incineration.

Poisons

Physical State: Liquid/Solid

Chemical Composition: Arsenics, carbamates, endrin, lindane, toxaphene,
methoxychlor, etc.

Other Data: May be an inhalation hazard.

Disposal is off-site via incineration.

Corrosives

Physical State: Aqueous

pH: Acids 2.0

Caustics 12.5

Chemical Composition:

Acids - Hydrochloric, nitric, chromic, phosphoric, sulfuric, etc.

Caustics - Sodium hydroxide, potassium hydroxide, etc.

Other Data: Keep acids and caustics separated from each other and do not add water to acids or caustics.

Disposal is off site via neutralization.

Characteristic and Others

Physical State: Liquid/Solid/Sludge

Chemical Composition: Listed plating sludges, toxic metals (chrome, lead, etc.) D018-43 TC wastes

Disposal is off site via stabilization, incineration or landfill.

3.0 SAMPLING METHODS

EQFL personnel trained to sample incoming materials perform sampling at the facility. The training includes personal protective equipment, sampling requirements, sampling equipment, and sampling techniques. Specific sampling procedures are dependent on both the nature of the material and the type of container. This section presents sampling methods to be utilized by EQFL personnel. The generator provides EQFL with information concerning the concentration, as well as the nature of the waste components on the profile sheet form. The analysis to be performed is a conformance check. Sampling protocols will follow approved sampling methods.

The sampling equipment and procedures described in this Waste Analysis Plan represents the facility's recommended sampling protocol for general types of waste materials and containers. Certain waste materials or containers may require different sampling procedures or equipment. Procedures and equipment may be updated and revised as new equipment or procedures become available. In general, the methods

utilized for sampling correspond to those referenced in 40 CFR 261, Appendix I. The general sampling methods and the equipment utilized for waste materials are presented in the Sampling Methods and Equipment Table that follows.

In addition to ASTM and EPA sampling procedures, EQFL has instituted specific methods for ensuring that samples taken from various types of containers are representative. The types of containers to be sampled at the facility vary, but usually are 55-gallon steel drums. Containers may consist of pails, drums, overpacks, totes, tankers, roll-off boxes, or other DOT approved containers. The sampling devices are selected, depending on the size and type of containers and on the specific material involved.

Access to a container (e.g., barrel bungs) influence the location within the container from which samples can be taken. Every effort to achieve representative samples will be taken. Sampling of small containers (e.g., drums and pails) varies with the nature of the waste material. For flowable materials, the sampling device of choice is a Coliwasa unit, tubing or sample rods, to draw a full vertical section. For non-flowable wastes, tubing or a trier is normally used to obtain a sample. Table 1 shows sampling methods and equipment.

Table 1 SAMPLING METHODS AND EQUIPMENT			
MATERIAL	METHOD	EQUIPMENT	SAMPLE CONTAINER
Extremely viscous liquid	ASTM D140-70 (a), E300	Tubing (b) or thief	Plastic/Glass jar with screw top
Crushed or powdered material	ASTM D364-75 (a), E300	Tubing (b), trier, scoop, or shovel	Plastic/Glass jar with screw top
Soil Material	ASTM D420-69 (a), E300	Tubing (b), trier, scoop, shovel or auger	Plastic/Glass jar with screw top

Soil like material	ASTM D1462.65 (a), E300	Tubing (b), trier, scoop, shovel, or auger	Plastic/Glass jar with screw top
Fly ash-like material	ASTM D2234-76 (a)	Tubing (b), trier, scoop, or shovel, auger	Plastic/Glass jar with screw top
Containerized liquids	SW-846 (c) ASTM E300 (a)	Coliwasa or tubing (b) or sample rod	Plastic/Glass jar with screw top

- (a) American Society for Testing Materials. Annual Book of ASTM Standards. Philadelphia, PA. 1982 or most recent edition.
- (b) Personal Protection and Safety Training Manual (Cincinnati, OH: USEPA National Training and Operational Technology Center 1981), pp. 3-1 and 3-4.
- (c) U.S. Environmental Protection Agency. Test Method for Evaluating Solid Waste. SW-846. Office of Solid Waste and Emergency Response, Washington, D.C., second edition 1982 or most recent edition.
- (d) Liquids in large containers are sampled with a Coliwasa, tubing, or sample rod to obtain a vertical section. Taking equal volumes from each applicable port and mixing in a common container obtain a composite sample. Light, dry powders, granules and heavier solids are sampled by trier or shovel, or by coring with heavy tubing or an auger.

4.0 ANALYTICAL RATIONALE & PROCEDURES

Analyses are performed on selected incoming wastes by EQFL to verify conformance with the approved profile. Analytical methods are classified as "Mandatory Waste Fingerprint Analyses," "Additional Analyses" and "Supplemental Analyses." This arrangement allows a progressive decision approach to waste identification enabling EQFL to analyze and to adequately identify the waste and to provide operational

controls for the various treatment processes as well as compatibility determinations. In addition, a minimum of 10 percent of all waste received will be Quality Assurance (QA) checked for accuracy of classification.

All incoming waste shipments are subjected to the "Mandatory Waste Fingerprint Analyses." "Mandatory Waste Fingerprint Analyses" are sufficient to properly verify that the waste received is the same as the waste that was characterized and identified on the pre-acceptance evaluation (waste profile). This is not designed to characterize the waste. EQFL may perform other "Additional Analyses" or "Supplemental Analyses" to provide further verification of waste characterization. "Additional Analyses" and/or "Supplemental Analyses" are performed at the direction of the Facility Management to further identify a waste or to make certain proper handling and treatment can be achieved. EQFL management may select these additional and/or supplemental analyses to perform the annual analysis, when mandatory analyses indicate or to provide additional operational control and compatibility determinations. A summary of the analytical parameters within each category and their use is provided below

Mandatory Waste Analyses

The "Mandatory Waste Fingerprint Analyses" include six screening procedures that are performed to provide a general identification of the waste and are used to indicate the type of treatment, storage, and disposal that is most suitable for that particular waste. These analyses provide the basis for the conformance check against the profile and manifest in confirming the identity of the waste. The parameters and associated rationale of the six "Mandatory Waste Fingerprint Analyses" are as follows:

1. Physical Description (i.e. appearance, physical state, layers, etc.) is used to determine the general physical properties of the waste. This facilitates subjective comparison of the sampled waste with prior waste descriptions or samples. It is used to identify obvious differences in waste type. It is also used to identify the presence or absence of free liquid. Samples are inspected and

the physical appearance of the waste is recorded Physical State (solid, semi-solid, liquid, etc.)

2. The pH Screen is undertaken to indicate the pH and, in general, the corrosive nature of the waste. The pH Screen will also aid in the compatibility determinations. pH may not apply to certain waste types (e.g., organic solvent waste, oil waste, or insoluble solid waste). Full range pH paper or a pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.
3. Water Mix is used to determine whether the waste has a potential to vigorously react with water to form gases or other products and to indicate whether it generates extreme heat when mixed with water. This test does not apply to wastes that are already in contact with excess water, or for which sufficient analytical data exist that indicate no potential reactivity with water. Approximately equal volumes of waste and water are mixed. Water should be added to the waste rather than addition of wastes to water. The following characteristics are noted:

Gross Solubility in H₂O

Gross Specific Gravity (heavier or lighter than water)

If water reactivity is noted (generation of gases, heat, turbulence or sudden physical changes such as solidification, thickening or emulsification) record the results.

4. Flammability Potential Screen is used to indicate the ignitability potential of the waste. It is also used to identify obvious differences in waste type, such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids.

A small amount of a liquid waste sample or a solid waste sample is placed into an aluminum-weighing tray (or similar laboratory container). A flame is very briefly applied to the sample. If the sample does not ignite, the result is recorded as a negative flammability potential (e.g., negative). If the sample ignites with the application of a flame, then the result is recorded as positive and may require further investigation. Liquids with a negative flammability potential may be quantified using an approved flash point tester.

Solids may be further investigated (e.g., via review of the Generator's Waste Material Profile Sheet or other supporting documentation) to determine flammability and BTU value for possible fuel blending disposal off site. The investigation will also examine the waste's potential to cause fire through friction, absorption of moisture, or spontaneous chemical changes.

NOTE: Halogenated solvents typically give off vapors that burn with a yellow (or greenish) smoky (sooty) flame in the presence of an external flame. Wastes with this type of non-sustaining flame are reported as having a negative flammability potential.

5. Organic Halogen Screen is used to indicate whether or not halogenated organics are present in the waste and the need for further analysis. It is also used to identify obvious differences in waste type such as waste solvent substituted for a waste acid. This test can be applied to all waste liquids, semi-solids, or solids. The Organic Halogen Screen will be used for wastes where halogen information is necessary. For example, hazardous wastes carrying halogen waste codes would not require this screen since it would not provide any useful information.
6. Oxidizer Screen is used to indicate whether or not the waste is a potential oxidizer. No EPA test method exists for identifying oxidizers. 40 CFR 261.21(a)(4) identifies oxidizers as defined in 49 CFR 173.151 by DOT. The DOT test involves igniting the material and a known oxidizer for comparison

testing. The EQFL Oxidizer Screen will not involve igniting oxidizers. This screening test is performed using potassium-iodide starch test paper (or equivalent) according to the laboratory operating procedure. All positive oxidizer screen results will be verified with an ORP test (or equivalent).

Additional Analyses

The applicability of these analyses as described below, are based on procedures and protocol formulated by EQFL (when determined necessary for proper classification):

1. Solidification Evaluation Test is run to determine whether the waste is amenable to solidification and to determine the ratio of solidification reagent-to-waste required to effect solidification.
2. Land Disposal Restriction (LDR) Stabilization Evaluation Test is run to demonstrate whether or not a Land Disposal Restricted Waste can be stabilized to meet the appropriate treatment standard.
3. Cyanide Screen is used to indicate whether the waste has the potential to produce hydrogen cyanide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing cyanides. This screening test is performed using Cyantessmo (or equivalent) test paper according to the laboratory operating procedure.
4. Sulfide Screen is used to indicate whether the waste has the potential to produce hydrogen sulfide upon acidification. It is not required if the pH of the waste is less than 6.0 or if the waste is not suspected of containing sulfides. This screening test is performed using lead acetate test paper (or equivalent) according to the laboratory operating procedure.

5. Peroxide Screen is used to indicate the presence of peroxides. It is not required if the waste is not suspected of containing peroxides.
6. BTU Screen is used on organic material to determine if BTU's are greater or less than 5,000 BTU/lb. for energy recovery by fuels substitution. It is not required for wastes not applicable to fuels substitution. It is also not required for fuels known to have greater than 5,000 BTU/lb.
7. Nitric Acid Screen is used to determine if material contains nitric acid. It is not required if the waste is not acidic or not suspected of containing nitric acid.
8. Radiation Screen is used to screen wastes for radioactivity above background. This screening is only performed if the waste is suspected of a potential for radioactivity. The sample is placed in a position below the Geiger-Mueller probe (or equivalent) for a period of at least five (5) seconds. An audible alarm and meter reading above the background reading will indicate radioactivity.
9. GC Scan is used to identify separate organic compounds. Management may request a GC Scan if they believe it is needed.
10. Metals scan is used to identify metals constituents. Management may request a metals scan if they believe it is needed.
11. Compatibility Testing to determine if material is compatible prior to consolidation or treatment. Proportional amounts of material will be mixed in a container. The mixture will be evaluated by observing physical and chemical changes that may occur. Temperature changes, formation of precipitates, change in pH, or evolution of gas will be noted. A significant change in any of these parameters indicates possible incompatibility.

Supplemental Analyses Using Standard Techniques

These test methods are adopted from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Office of Solid Waste SW-846, Updates and Appended Materials) and other EPA approved methods. Other methods may be added as required.

5.0 INCOMING WASTE SHIPMENT PROCEDURES

Each hazardous waste shipment, upon arrival at the facility, will be inspected, sampled and analyzed as defined herein. All RCRA-regulated waste shipments will be sampled and analyzed according to this WAP. This includes bulk shipments manifested to EQFL even though it may be re-manifested out immediately without entering or not stored at the facility. All shipments received on manifest will be entered into the EQ electronic waste tracking system (EQAI). This serves two purposes. First, it compares the actual waste shipment identity with that identified in the pre-acceptance phase and that listed on the waste manifest. Second, it ensures the proper management of the waste through final disposal off site.

The Quality Control (QC) sheets or computer EQAI container tracking system tracks the waste through the facility from point of arrival at the receiving area to its final disposal. The current EQFL QC sheet is enclosed as Attachment 6. The identity, quantity, and types of waste from each generator's incoming shipment are tracked and documented by the EQAI tracking system and QC sheets. Mandatory Waste Fingerprint Analysis results are also tracked and documented by this method.

Incoming waste shipment identification verification begins upon arrival of the waste at the facility. The sampling and analysis of the incoming waste will be performed in accordance with the methods described in this WAP. The shipping papers for the waste are checked and compared to the approved profile. The waste will be accepted (pending quality control verification) if the shipping documents are correct. Shipping

document discrepancies are resolved with the generator prior to acceptance (pending quality control verification) of any waste material. Hazardous waste shipments will be sampled and analyzed for at least the mandatory waste fingerprint analyses. This occurs every time a shipment is received. Attachment 4 shows a diagram for EQFL Waste Screening.

A minimum of 10 percent of the containers per each waste stream will be selected for sampling of non-lab pack waste. Example: For a shipment of one waste stream of 80 containers, a minimum of 8 samples will be taken. Container samples that are related to one generator and one process may be composited prior to analysis, providing the individual samples are similar in physical appearance. If discrepancies are noted in samples taken from 10 percent of the containers, such as the material approved is a solid and liquids are found, all remaining containers will be opened and inspected (at minimum).

Certain types of waste are not sampled or analyzed. These are lab packs from facilities such as households, laboratories and schools, and "empty" containers. A visual inspection of at least 10 percent of the "empty" containers will be performed to ensure the containers are empty as per 40 CFR 261.7(b)(1). Lab pack procedures are described in the Lab Pack section of this WAP. Wastes such as light bulbs, lamps, batteries and aerosol containers are also not sampled.

The general logic utilized by the facility personnel in deciding whether to accept or reject a particular waste load is based on "mandatory waste fingerprint analyses." Other major decisions regarding waste acceptance is the need for additional analyses, the actual waste identification, and an evaluation of whether a waste found to be off-specification can still be accepted. Attachment 4 illustrates the general procedure followed for processing all incoming waste shipments.

The EQFL chemist or facility manager decides whether additional analyses are required for a particular waste based on the following:

- Results of "Mandatory Waste Fingerprint Analyses"
- Knowledge of generator and/or waste-generating process
- Results of pre-acceptance evaluation.

Further testing will be required if the results indicate unexpected presence or absence of screen parameters with respect to pre-acceptance analytical results or if there is reason to suspect that the waste composition has changed. The effectiveness of the waste identification step is dependent on the following components:

- Inspection
- Sampling
- Analytical Results
- Waste Profile
- Any additional documentation supplied by the generator
- Land Disposal Restrictions of 40 CFR Part 268
- Waste Manifest
- Pre-Acceptance Analytical Results
- Management Decision

Laboratory personnel must classify the waste as being "off-specification" if it is significantly different in waste type from the information shown in the profile, the pre-acceptance evaluation or on the manifest. Wastes found to be in non-conformance may be rejected. They may be re-evaluated for possible acceptance by the facility despite the non-conformance or they may be shipped to an alternate TSD facility if the proper treatment method is available. The re-evaluation may be based on the following criteria:

Permit Authorization
Discussions with the Generator
Facility Conditions
Facility Manager's or Designee's Judgment

Pursuant to 40 CFR Part 265.72, the facility personnel must discuss and attempt to resolve with the generator any discrepancies between the actual waste and that shown on the manifest.

EQFL does not accept the materials listed below:

Regulated Explosives
Regulated Bio-Hazardous
Regulated Radioactive Materials

6.0 OPERATIONAL PROCEDURES

Each movement of a waste within the facility during which any change in its type or overall properties occur may make it subject to additional inspection, sampling and analysis to determine appropriate handling and management of the waste. Many of the analyses needed for the treatment, storage, and disposal functions are performed during incoming shipment identification. These are not repeated unless it is known or believed that the waste identity may have changed during storage or processing.

7.0 QUALITY CONTROL POLICY

EQFL intends to follow all sampling and testing criteria's set fourth in accordance with applicable SW-846 methods. For methods not addressed in SW-846, ASTM or comparably standardized laboratory methods will be used. It is EQFL's understanding that this will be acceptable since our sampling and analysis at the facility are primarily for "fingerprint screening" of incoming wastes to assure that they meet profiled

parameters. With the exception of flash point and pH methods, sampling and analysis for removal of waste codes will be carried out under an approved Comprehensive Quality Assurance Plan (CompQAP) through a contract laboratory. If a certified laboratory has provided sufficient results then waste codes may be removed from the sampled containers. This method will also hold true to any samples collected after stabilization of certain waste. It is our understanding that the SW-846 methods for flash point and pH are acceptable to the department. Should it be deemed necessary, EQFL will submit an application for its own CompQAP at some future date.

EQFL has developed a program of quality control practices and procedures to ensure that precision and accuracy are maintained throughout its laboratory. Contract laboratories employed by the company must demonstrate quality control practices equivalent or greater than regulatory requirements.

The EQFL QC Sampling and Analysis Procedures are utilized to verify waste characterization and not to quantitatively analyze the waste. This section does not provide specific performance standards of quality control procedures for individual sampling and analysis techniques. Such specifics can be found in the facility Laboratory SOP manual. The specific performance standards are dynamic and are revised as warranted to reflect technological advances in sampling and analytical techniques.

8.0 Acceptance of Packaged Laboratory Wastes (lab packs)

Laboratory chemicals from many different sources are accepted at the facility. The majority of the "laboratory chemicals" (lab packs) received by the facility are household exempt wastes. The household waste lab packs consist primarily of paints and paint related materials. Other household wastes include cleaners, pool chemicals, pesticides, and lawn chemicals. Lab packs from industrial generators consist of virtually any type of chemical acceptable by the EQFL permit. Lab packs may be EQFL packed or be "customer" (generator) packed. Lab packs that are EQFL packed have

been packed by EQFL personnel (chemist or equivalent). The container contents have been reviewed, packed, documented, approved, and verified by an EQFL chemist or equivalent. Generator packed lab packs have been packed by generator personnel. The generator submits a container contents sheet to EQFL for review and approval. A copy of the current EQFL lab pack container contents sheet is included as Attachment 5.

The following is a partial example of lab pack guidelines and procedures that are used for lab pack wastes. Complete EQFL lab pack guidelines are available on site at the EQFL facility.

GUIDELINES FOR ACCEPTABLE LAB PACKS

Group 1: Alkali (with pH greater than 12.5)

- A) Inorganic alkaline chemicals (e.g. sodium hydroxide, calcium hydroxide including alkaline salts, Na₃ PO₄, sodium borate).
- B) Organic bases (e.g. triethanolamine)

Group 2: Acids (with pH less than 2)

- A) Inorganic acids (e.g. hydrochloric acid, sulfuric acid) as solids or as liquids.
- B) Organic acids, (e.g. stearic acid, citric acids, acetic acid)

Group 3: Non-Hazardous - (e.g., plastics, oils)

- A) No container larger than 5 gallons to be packed in drum.
- B) No more than 50#/containers of solids to be packed without special permission.
- C) Maximum quantities per lab pack container are as follows:

- a. 20 gallons per 55-gallon drum
- b. 11 gallons per 30-gallon drum
- c. 2 gallons per 5-gallon drum
- d. For solids, use spacing rule (e.g. 2-3" between drum walls and materials)
- e. Sealed liquid containers should be overpacked in drum with enough compatible absorbent to absorb all liquid if broken.

The above list is not all-inclusive but should be regarded as an example of a basic packing guideline for lab packs.

UNACCEPTABLE LAB PACKS

- 1. Regulated Explosives
- 2. Regulated Bio-Hazardous
- 3. Regulated Radioactive Materials

Procedure for Waste Acceptance

Before containers are shipped to EQFL, a waste profile form or electronic version must be submitted to EQFL, including a complete set of container contents sheets describing the contents of each drum in terms of explicit chemical identification, quantities, concentrations, pH, etc., as applicable. EQFL Technical Services (chemist or equivalent) will review the profile and the container contents sheets and inform the generator of any materials that are not acceptable, the packing of incompatible materials that are not acceptable, or the packing of incompatible materials within the same drum. When the generator has made the necessary corrections, corrected container contents (changes indicated, initialed, and dated) should be sent to EQFL. After review of the corrections, the generator will be notified that the waste is approved for shipment. When the hazardous waste arrives at EQFL, a chemist or equivalent will

quality control check the lab packs. A minimum of 10% of EQFL packed hazardous waste lab packs will be opened and inspected. Each generator packed hazardous waste lab pack (100%) will be opened and inspected. See Attachment 4 (Waste Screening Flow Chart) for further information.

Site Generated Waste

Site-generated wastes include the following:

- Containment sump liquids and residues
- Spent fluorescent lamps
- Spent batteries
- Lab trash
- Lab wastes and rinses
- Samples (when hold time is complete)
- Personal protective equipment
- Chemical rags

Site-generated wastes are characterized and managed according to all applicable requirements and regulations.

APPENDIX I

PROOF OF PROPERTY OWNERSHIP



Bob Henriquez
HILLSBOROUGH COUNTY PROPERTY APPRAISER



[[VIEW PROPERTY RECORD INFORMATION](#)]



FOLIO:	1597820000
PIN NUMBER:	A-14-29-19-4CE-000001-00008.0
OWNER 1:	EQ FLORIDA INC
ADDRESS:	2002 N ORIENT RD TAMPA
LEGAL DESC:	LOT 8 ON W
DOR CODE:	4830

VALUE SUMMARY:

BUILDING VALUE:	\$289,678
EXTRA FEATURE VALUE:	\$25,558
LAND VALUE (MARKET):	\$122,379
LAND VALUE (AGRI.):	\$0
JUST (MARKET) VALUE:	\$437,615
ASSESSED VALUE (A10):	\$437,615
EXEMPT VALUE:	\$0
TAXABLE VALUE:	\$437,615

SALES INFORMATION

NEW!

1/30/2004	\$806,100.00
8/1/1998	\$497,000.00
1/1/1989	\$200,000.00

FOLIO: 1597820000 PIN: A-14-29-19-4CE-000001-00008.0 ACREAGE: 1.44 / SQFT: 62,908

Map created on 10/18/2013 6:27:38 PM.

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Bob Henriquez
HILLSBOROUGH COUNTY PROPERTY APPRAISER



[VIEW PROPERTY RECORD INFORMATION]



FOLIO: 1598030100
PIN NUMBER: A-14-29-19-4CE-000005-00001.0
OWNER 1: EQ FLORIDA INC
ADDRESS: 7202 8TH AV
TAMPA
LEGAL DESC: PARK PL 12 PG 63
DOR CODE: 4830

VALUE SUMMARY:

BUILDING VALUE:	\$370,809
EXTRA FEATURE VALUE:	\$59,028
LAND VALUE (MARKET):	\$253,460
LAND VALUE (AGRI.):	\$0
JUST (MARKET) VALUE:	\$683,297
ASSESSED VALUE (A10):	\$683,297
EXEMPT VALUE:	\$0
TAXABLE VALUE:	\$683,297

SALES INFORMATION

NEW!

1/30/2004	\$806,100.00
8/1/1998	\$497,000.00
10/1/1994	\$305,000.00

FOLIO: 1598030100 PIN: A-14-29-19-4CE-000005-00001.0 ACREAGE: 3.08 / SQFT: 134,277

Map created on 10/18/2013 6:24:05 PM.

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St
Clerk

After Recording, Return to:
City of Tampa
Office of the City Clerk
315 East Kennedy Blvd
Old City Hall, 3rd Floor
Tampa, Florida 33602
Tel: 813-274-8396

ORDINANCE NO. 2007- 1

AN ORDINANCE VACATING, CLOSING, DISCONTINUING
AND ABANDONING A CERTAIN RIGHT-OF-WAY (ALL THAT
PORTION OF 8TH AVENUE LYING SOUTH OF 9TH AVENUE,
NORTH OF 7TH AVENUE, EAST OF 71ST AVENUE AND WEST
OF ORIENT ROAD), IN ORIENT PARK, A SUBDIVISION IN
THE CITY OF TAMPA; THE SAME BEING MORE FULLY
DESCRIBED IN SECTION 2 HEREOF; PROVIDING AN
EFFECTIVE DATE.

WHEREAS, a petition under City Clerk file number C2006-22 has been
submitted by Esteban Resendez for EQ Florida Inc. ("Petitioner"), to City
Council, City of Tampa, asking that certain right-of-way described in Section 2
hereof be vacated, closed, discontinued and abandoned; and

WHEREAS, City Council hereby finds that vacating of the subject right-
of-way is in the general public interest and that all requirements provided by law
have been complied with.

NOW, THEREFORE,

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF TAMPA,
FLORIDA:

Section 1. That the recitals above be and the same are hereby incorporated as
if fully set forth herein.

Section 2. That certain right-of-way more particularly described as follows:

Legal description is attached hereto as Exhibit "A" and by reference
made a part hereof,

All that portion of 8th Avenue (Eighth Avenue) lying South of and abutting the South boundary of Lots 4-8, Block 5, and lying North of and abutting the North boundary of Lots 3-7, Block 8, ORIENT PARK, as map or plat thereof is recorded in Plat Book 11, Page 7, of the public records of Hillsborough County, Florida.

City of Tampa
Office of Map & Mapping Section
LEGAL DESCRIPTION APPROVED

Date: 10/05/06 File No: C06-22
By: H-17 By: [Signature]

Exhibit "A"

APPENDIX J

DOCUMENTATION OF SITE COMPLIANCE WITH 62-701.300, F.A.C.

COMPLIANCE WITH 62-701.300, F.A.C.

Section 62-701.300, F.A.C., sets forth specific restrictions on the location and operation of solid waste management facilities. This section has been prepared to demonstrate EQFL's compliance with these restrictions.

Figure 1 is a U.S. Geological Survey Quadrangle Map (Brandon Quadrangle) identifying the facility location. Figure 2 is an aerial photograph identifying the facility. The facility location is also identified on Figure 3 which identifies key features of the surrounding area such as water bodies and wells.

Groundwater Contamination Considerations – Orient Park Industrial Area

The EQFL facility is located in a heavily industrialized area of Orient Park in Tampa, Florida. Prior to being purchased by EQFL in 1989, the property was unoccupied vacant land and residential property with one residence. Prior to start-up of EQFL, there were no solid waste management activities at the property as documented by an EPA Region IV RCRA Facility Assessment completed in 1988.

There have been no releases of hazardous constituents to the groundwater at the EQFL facility since operations began in 1989. EQFL voluntarily performs periodic monitoring of the groundwater from its property for liability protection. There are a total of four groundwater-monitoring wells at the EQFL facility. Three are located up-gradient and one down-gradient of the facility.

Historical records of analytical data from analysis of groundwater samples taken from the EQFL facility indicate that several regulated compounds have been detected at levels that exceed regulatory standards. It has been confirmed that historical releases from the National Priorities List Helena Chemical Co. site (Superfund site) are responsible for the elevated levels of regulated constituents in the EQFL groundwater samples. These elevated levels have been found in samples taken both up-gradient as well as down-gradient of the EQFL facility. The Helena Chemical Co. site is located approximately 250 feet north (up-gradient) of the EQFL facility. A Remedial Investigation (ESD 1995a¹), Feasibility Study (ESD 1995b²), and Record of Decision (EPA 1996³) have been completed and issued for the Helena site.

Other industrial sites are located within 500 feet up gradient of the EQFL facility. They include Wheelblast, Stauffer, Alaric, Singleton Woodcraft, and Trademark Metals Recycling (formerly known as Gulf Coast Metals). Some of these industrial sites may be contributors to the documented elevated levels of regulated constituents in the Orient Park industrial area.

Air and Water Quality

Rule 62 701.300(1)(b), F.A.C., states, "no person shall store, process, or dispose of solid waste in a manner or location that causes air quality standard to be violated or water quality standards or criteria of receiving water to be violated."

No direct discharges of waste water are expected from the EQFL facility and as such no water quality standards or criteria will be violated by the operation of this facility. Air emissions associated with

¹ (ESD 1995a) "Final Remedial Investigation Report," Environmental and Safety Designs, Inc for Helena Chemical Company, March 29, 2005.

² (ESD 1995b) "Helena Chemical Company Tampa Site, Feasibility Study," Environmental and Safety Designs, Inc for Helena Chemical Company, May 25, 2005.

³ (EPA 1996) "Record of Decision – Summary of Remedial Alternative Selection," EPA Region IV, May 7, 1996.

EQFL's waste management activities are expected to be negligible and are not expected to contribute to violations of air quality standards.

Geological Formation Support

Rule 62.701.300(2)(a), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001, or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste in an area where geological formations or other subsurface features will not provide support for the solid waste."

The EQFL facility is not located in an area where geological formation or other subsurface features will not provide support for the solid waste. A Geological Cross-Section of the facility is shown in Figure 14.

Potable Water Wells

Rule 62.701.300(2)(b), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001, or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste within 500 feet of an existing or approved potable water well unless storage or disposal takes place at a facility for which a complete permit application was filed or which was originally permitted before the potable water well was in existence. This prohibition shall not apply to any renewal of an existing permit that does not involve lateral expansion, nor to any vertical expansion at a permitted facility."

The Southwest Florida Water Management District's Water Management Information System (WMIS) was researched to identify potable wells that may be located within 500 feet of the facility. A figure identifying the 500 foot radius from the property boundary is presented as Figure 3. Based upon review of the WMIS database online, a number of well completion permits were identified for wells of various types located in the general area of the facility. The WMIS database is currently limited in its ability to sort wells by function and professional judgment was used to screen out wells used for monitoring or recovery purposes considering the general heavy industrial use of the area surrounding the EQFL facility (see "Groundwater Contamination Considerations – Orient Park Industrial Area" section above). In addition, because of the way the wells are loaded into the database, most are given similar latitudes and longitudes due to poor information by the applicant or driller. This results in tens of wells plotting in the same place on the location map. Upon further review of the database it was determined that one water well (WCP Permit #687154) of possible concern is present within a 500-foot radius of the EQFL property boundary. The well owner is listed as Alaric and the total well depth is reported as 440 feet below existing ground surface. The current status and use of the well could not be determined through records available online. It should be noted that this well was not identified during the previous well survey completed for the EQFL facility during 2008 suggesting that it may be a component of the ongoing groundwater remedy at this National Priorities List superfund site. Information on this well is contained in Appendix E of Volume 2 of 3.

Dewatered Pits

Rule 62.701.300(2)(c), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001, or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste in a dewatered pit unless the pit is lined and

permanent leachate containment and special design techniques are used to ensure the integrity of the liner."

This facility does not operate a dewatered pit. No waste will be stored or disposed of in a dewatered pit.

Natural of Artificial Bodies of Water

Rule 62.701.300(2)(d), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001, or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste in any natural or artificial body of water including ground water and wetlands within the jurisdiction of the Department."

The facility is not located in any natural or artificial body of water. No waste will be stored or disposed of into a body of water including ground water and wetlands.

Setback from Bodies of Water

Rule 62.701.300(2)(e), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001, or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste within 200 feet of any natural or artificial body of water unless storage or disposal takes place at a facility for which a complete permit application was filed or which was originally permitted before the water body was in existence. This prohibition shall not apply to any renewal of an existing permit that does not involve lateral expansion, nor to any vertical expansion at a permitted facility. For purposes of this paragraph, a "body of water" includes wetlands within the jurisdiction of the Department, but does not include impoundments or conveyances which are part of an on-site, permitted stormwater management system, or bodies of water contained completely within the property boundaries of the disposal site which do not discharge from the site to surface waters.

A person may store or dispose of solid waste within the 200 foot setback area upon demonstration to the Department that permanent leachate control methods will result in compliance with water quality standards and criteria. However, nothing contained herein shall prohibit the Department from imposing conditions necessary to assure that solid waste stored or disposed of within the 200 foot setback area will not cause pollution from the site in contravention of Department rules."

The facility is not located within 200 feet of any natural or artificial body of water including wetlands. Figure 3 identifies the 200-foot radius from the property boundary in relation to water bodies in the area of the site.

Right of Way

Rule 62 701.300(2)(f), F.A.C., states, "Unless authorized by a Department permit or site certification in effect on May 27, 2001 or unless specifically authorized by another Department rule or a Department license or site certification based upon site-specific geological, hydrogeological, design, or operational features, no person shall store or dispose of solid waste on the right of way of any public highway, road, or alley."

Waste will be stored within the facility boundary and not within the right of way of any public highway, road or alley.

Open Burning

Rule 62 701.300(3), F.A.C., states, "Open burning of solid waste is prohibited except in accordance with Rule 62-256, F.A.C. Controlled burning of a solid waste is prohibited except in a permitted incinerator, or in a facility in which the burning of solid waste is authorized by a site certification order issued under Chapter 403, Part II, F.S."

Solid waste is not burned at the EQFL facility.

Hazardous Waste

Rule 62 701.300(4), F.A.C., states, "No hazardous waste shall be disposed of in a solid waste management facility unless such facility is permitted pursuant to Chapter 62 730, F.A.C."

No hazardous wastes are accepted under this permit. A separate hazardous waste permit, approved by the Department has been issued for hazardous waste operations at this facility.

PCBs

Rule 62 701.300(5), F.A.C., states, "Disposal of liquids containing a polychlorinated biphenyl (PCB), or non-liquid PCBs in the form of contaminated soil, rags, or other debris, may be restricted or prohibited by 40 CFR Part 761. Persons managing PCBs are advised to consult that federal regulation before attempting to dispose of PCBs in any solid waste disposal unit in this state."

No PCB waste will be accepted under this permit. Prior to acceptance, wastes are profiled and inspected in accordance with the facility Waste Analysis Plan to ensure that the nature of the wastes being accepted is known and that the waste is properly managed.

Bio-hazardous Waste

Rule 62 701.300(6), F.A.C., states:

“(a) No biomedical waste shall be knowingly deposited in any solid waste management facility unless:

1. The solid waste facility is specifically permitted to receive untreated biomedical waste;
2. The biomedical waste has been properly incinerated so that little or no organic material remains in the ash residue, or treated by a process approved by the Department of Health, and the provisions in Rule 62-701.520(5)(c), F.A.C., are complied with; or
3. The biomedical waste is generated by an individual as a result of self-care, or care by a family member or other non-health care provider. However, in order to reduce the chance of exposure to the public, home generators are advised to segregate and package such waste before disposal according to the guidelines for disposal of home-generated biomedical waste available from each county health department.

-(b) No solid waste, including treated biomedical waste, shall be commingled with untreated biomedical waste unless the solid waste is being managed in the same manner as the untreated biomedical waste.

-(c) Treated or untreated biomedical waste shall not be allowed to leak into the environment during transport.”

Bio-hazardous wastes are not accepted at this facility. Prior to acceptance, wastes are profiled and inspected in accordance with the facility Waste Analysis Plan to ensure that the nature of the wastes being accepted is known and that the waste is properly managed.

Class I Surface Waters

Rule 62 701.300(7), F.A.C., states, "The Department shall not issue a construction permit for a landfill within 3,000 feet of Class I surface waters."

This rule does not apply to this facility as it is not a landfill.

Special Wastes for Landfills

Rule 62 701.300(8), F.A.C., pertains to special wastes for landfills. It states:

"-(a) No person who knows or who should know of the nature of such solid waste shall dispose of the following wastes in any landfill:

1. Lead-acid batteries;
2. Used oil in any landfill, except as provided in Chapter 62-710, F.A.C.;
3. Yard trash in a Class I landfill, except as may be allowed pursuant to Section 403.708(12)(c), F.S.; and,
4. White goods in any landfill.

-(b) Whole waste tires may not be disposed of in any landfill or in any construction and demolition debris disposal facility, except as provided in Chapter 62-711, F.A.C."

This facility is permitted to manage these special wastes and to ensure that no special waste will be disposed of in a landfill. Prior to acceptance, wastes are profiled and inspected in accordance with the facility Waste Analysis Plan to ensure that the nature of the wastes being accepted is known and that the waste is properly managed.

Special Wastes for Waste to Energy Facilities

Rule 62 701.300(9), F.A.C., pertains to special wastes for waste to energy facilities. It states, "No person who knows or who should know of the nature of such solid waste shall dispose of lead-acid batteries, mercury-containing devices, or spent mercury-containing lamps in any waste-to-energy facility."

No special waste will be disposed for any waste-to-energy facility. Prior to acceptance, wastes are profiled and inspected in accordance with the facility Waste Analysis Plan to ensure that the nature of the wastes being accepted is known and that the waste is properly managed.

Liquid Restrictions

Rule 62 701.300(10), F.A.C., states:

"-(a) Noncontainerized liquid waste shall not be placed in solid waste disposal units which accept household waste or construction and demolition debris for disposal unless:

1. The liquid waste is household waste other than septic waste; or

2. The liquid waste is leachate or gas condensate derived from the solid waste disposal unit, or by products of the treatment of such leachate or gas condensate, and the solid waste disposal unit is lined and has a leachate collection system.

-(b) Containers holding liquid waste shall not be placed in a solid waste disposal units unless:

1. The container is a small container similar in size to that normally found in household waste;
2. The container is designed to hold liquids for use other than storage; or
3. The waste is household waste.

-(c) Containers or tanks twenty gallons or larger in capacity shall either have one end removed or cut open; or have a series of punctures around the bottom to ensure the container is empty and free of residue. The empty container or tank shall be compacted to its smallest practical volume for disposal.”

All liquids received and processed at this facility will comply with these rules. Liquid wastes will be solidified prior to shipment for disposal, or shipments of liquid waste will be sent to off-site treatment facilities for management.

Used Oil and Oily Waste

Rule 62 701.300(11), F.A.C., states:

“-(a) Used oil and oily wastes. Except as provided in paragraph (b) of this subsection, no person may mix or commingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills.

-(b) Oily wastes, sorbents or other materials used for maintenance or to clean up or contain leaks, spills or accidental releases of used oil, and soils contaminated with used oil as a result of spills or accidental releases are not subject to the prohibition in paragraph (a) of this subsection.”

This facility is permitted to manage used oil. Used oil is sent off-site for recovery. No used oil or oily waste will be mixed or commingled with solid waste except as provided for in Rule 62 701.300(11)(b), F.A.C.

Exceptions

The following Rules set out exceptions to the previously discussed restrictions: 62 701.300(12), 62 701.300(13), 62 701.300(16), and 62 701.300(17), F.A.C. EQFL will not exercise any of these exceptions as the facility meets the restrictions as discussed above.

CCA Treated Wood

Rule 62 701.300(14), F.A.C., states, “CCA treated wood shall not be incorporated into compost or made into mulch, decorative landscape chips or any other wood product that is applied as a ground cover, soil or soil amendment. CCA treated wood may be ground and used as initial cover on interior slopes of lined solid waste disposal facilities provided it meets the criteria of subsection 62-701.200(53), F.A.C. CCA treated wood shall not be disposed of through open burning or through combustion in an air curtain incinerator.”

CCA treated wood will not be processed or burned at the facility.

Dust

Rule 62 701.300(15), F.A.C., states, “The owner or operator of a solid waste management facility shall not allow the unconfined emissions of particulate matter in violation of paragraph 62-296.320(4)(c), F.A.C.”

There will be no unconfined emissions of particulate matter at the facility in violation of paragraph 62-296.320(4)(c), F.A.C.

Existing Facilities

Rule 62 701.300(18), F.A.C., states, “Those portions of facilities which were constructed prior to May 27, 2001, remain subject to the prohibitions that were in effect at the time the permit authorizing construction was issued. Lateral expansions of such facilities remain subject to the prohibitions that were in effect at the time the permit authorizing the lateral expansion was issued. For example, portions of facilities constructed prior to May 19, 1994 were subject to the prohibition against storing or disposing of solid waste within 500 feet of an existing or approved shallow water supply well, but are not subject to the prohibitions of paragraphs (2)(b) and (h) of this section. However, lateral expansions of such facilities which occurred after May 19, 1994 are subject to the prohibitions of paragraphs (2)(b) of this section.”

The facility meets the current restrictions; however, according to this Rule, only the Waste Processing Building and the Solid Waste Operations Area are actually subject to the current standards as the remaining portions of the site were constructed prior to 2001.

APPENDIX K

SOLIDIFICATION AGENT DATA

ROBBINS MANUFACTURING CO.

SAWDUST

MATERIAL SAFETY DATA SHEET

Product Name: Screened Sawdust, Screened Shavings

SECTION I--DIVISION AND LOCATION

Robbins Manufacturing Co.
13904 State Road 471
Webster, Florida 33597
Telephone: (352) 793-8900

SECTION II--HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Ingredients in Product: Kiln Dried White Pine Wood
Chemical Name and Synonyms: Cellulosic Wood Fibre
Chemical Family: Cellulose
Molecular Formula: Complex

SECTION III--PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: N/A
Vapor Pressure: N/A
Vapor Density: N/A
Solubility in Water: Insoluble
Specific Gravity: (WATER = 1): <1
Melting Point: N/A
Evaporation Rate: N/A
Appearance: Yellowish particles of wood/sawdust
Odor: None to typical wood smell

SECTION IV--FIRE AND EXPLOSION DATA

Flash Point: N/A
Flammable Limits: Slight when exposed to flames
Extinguishing Media: Dry chemical, Water spray, Foam
Special Fire Fighting Procedures: None
Unusual Fire and Explosion Hazards: Avoid CO_2 blast. Spontaneous heating possible. Avoid hot, humid storage. Do not disperse in air, as this could lead to dust explosion.

SECTION V--REACTIVITY DATA

Stability: Stable
Incompatibility (Material to Avoid): Strong oxidizing agents
Hazardous Decomposition or By-products: Unknown
Hazardous Polymerization: Will not occur

SECTION VI--HEALTH HAZARD DATA

Permissible Concentrations (AIR): Unknown
Effects of Overexposure: Allergies, dermatitis (skin irritation)
Toxicological Properties: Unknown

EMERGENCY FIRST AID PROCEDURES

Eyes: Flush with large amounts of water, consult an eye physician

Skin Contact: Wipe off excess, wash with soap and water
Inhalation: Remove from area
If Swallowed: Call physician immediately

SECTION VII--PRECAUTIONS FOR SAFE HANDLING AND USE

Procedures for Clean-up: Handle as normal solid waste. Scoop up and place in waste container, vacuum, or wet clean.
Waste Disposal Method: Waste material can be buried in an approved landfill or handled as inert waste in accordance with Federal, State, and Local Environmental Regulations

SECTION VIII--SPECIAL PROTECTION INFORMATION

Ventilation Type Required (Local, Mechanical, Special): Use adequate ventilation in volume to keep dust concentration below T1V ($3\text{mg}/\text{m}^3$).
Respiratory Protection: NIOSH approved Dust to Mist Respirator
Eye Protection: Safety glasses or goggles
Other Protective Equipment: N/A

SECTION IX--SPECIAL PRECAUTIONS

Precautions to be Taken in Handling and Storing: Store dry at ambient temperature. Avoid moisture.
Other Precautions: None

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind, express or implied, and we assume no responsibility for any loss, damage, or expense, direct or consequential, arising out of their use.

Preparer: Robbi Tencorio
Original Date: 12/04/00
Revision Date:
Supersedes:



ANALYTICAL REPORT

Job Number: 660-14036-1

Job Description: EQ Florida

For:
EQ of Florida
7202 E. 8th Avenue
Tampa, FL 33619

Attention: Mr. Michael Skirvin

A handwritten signature in black ink, appearing to read "Peggy Penner", written over a horizontal line.

Peggy Penner
Project Manager II
ppenner@stl-inc.com
03/09/2007

Project Manager: Peggy Penner

DOH Certification #: STL Tampa E84282; STL Savannah E87052

These test results meet all the requirements of NELAC unless specified in the case narrative. All questions regarding this test report should be directed to the STL Project Manager who signed this test report. The estimated uncertainty associated with these reported results is available upon request.

Case Narrative for job: 660-J14036-1

Client: EQ of Florida

Date: 03/09/2007

TCLP 8260

Insufficient time remained in the hold time to complete this analysis within hold. The results are flagged with a Q qualifier and should be considered estimates.

Reactive Sulfide

The hold time had expired for this analysis by the time of receipt in STL-Tampa. This analyte is flagged with a Q qualifier and should be considered estimates.

METHOD SUMMARY

Client: EQ of Florida

Job Number: 660-14036-1

Description	Lab Location	Method	Preparation Method
Matrix: Solid			
Volatile Organic Compounds by GC/MS	STL SAV	SW846 8260B	
Toxicity Characteristic Leaching Procedure (ZHE)	STL SAV		SW846 1311
Purge and Trap on Leachates	STL SAV		SW846 5030B
Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)	STL TAM	SW846 8270C	
Toxicity Characteristic Leaching Procedure	STL TAM		SW846 1311
Continuous Liquid-Liquid Extraction	STL TAM		SW846 3520C
Organochlorine Pesticides by Gas Chromatography	STL TAM	SW846 8081A	
Toxicity Characteristic Leaching Procedure	STL TAM		SW846 1311
Separatory Funnel Liquid-Liquid Extraction	STL TAM		SW846 3510C
Chlorinated Herbicides by GC	STL TAM	SW846 8151A	
Toxicity Characteristic Leaching Procedure	STL TAM		SW846 1311
Chlorinated Herbicides by GC - Aqueous Prep	STL TAM		SW846 8151A
Inductively Coupled Plasma - Atomic Emission Spectrometry	STL TAM	SW846 6010B	
Toxicity Characteristic Leaching Procedure	STL TAM		SW846 1311
Acid Digestion of Aqueous Samples and Extracts	STL TAM		SW846 3010A
Mercury in Liquid Waste (Manual Cold Vapor Technique)	STL TAM	SW846 7470A	
Toxicity Characteristic Leaching Procedure (Hg)	STL TAM		SW846 1311
Mercury in Liquid Waste (Manual Cold Vapor)	STL TAM		SW846 7470A
Ignitability of Solids	STL TAM	SW846 1030	
Reactive Cyanide Analysis using method 9014	STL SAV	SW846 9014	
Cyanide, Reactive (SW7.3.3)	STL SAV		SW846 7.3.3
Titrimetric Procedure for Acid-Soluble and Acid-Insoluble Sulfides	STL SAV	SW846 9034	
Sulfide, Reactive (SW7.3.4)	STL SAV		SW846 7.3.4
Soil and Waste pH	STL TAM	SW846 9045C	
Deionized Water Leaching Procedure (Routine)	STL TAM		ASTM NONE

LAB REFERENCES:

STL SAV = STL Savannah

STL TAM = STL Tampa

METHOD REFERENCES:

SW846 - "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

SAMPLE SUMMARY

Client: EQ of Florida

Job Number: 660-14036-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
660-14036-1	MDF/LDF Fiberboard	Solid	02/08/2007 1221	02/20/2007 1253
660-14036-2	Purge PA2	Solid	02/08/2007 1205	02/20/2007 1253

EXECUTIVE SUMMARY - Detections

Client: EQ of Florida

Job Number: 660-14036-1

Lab Sample ID Analyte	Client Sample ID	Result / Qualifier	Reporting Limit	Units	Method
660-14036-1	MDF/LDF FIBERBOARD				
Ignitability		NEG		mm/sec	1030
<i>TCLP</i> Barium		0.17 I	0.50	mg/L	6010B
<i>Soluble</i> pH-S		5.88	1.00	SU	9045C
660-14036-2	PURGE PA2				
Ignitability		NEG		mm/sec	1030
<i>TCLP</i> Barium		0.42 I	0.50	mg/L	6010B
<i>Soluble</i> pH-S		5.46	1.00	SU	9045C

SAMPLE RESULTS

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1

Date Sampled: 02/08/2007 1221

Client Matrix: Solid

Date Received: 02/20/2007 1253

8260B Volatile Organic Compounds by GC/MS -TCLP

Method:	8260B	Analysis Batch:	680-68567	Instrument ID:	GC/MS Volatiles - O
Preparation:	5030B			Lab File ID:	o5110.d
Dilution:	20	Leachate Batch:	680-68491	Initial Weight/Volume:	5 mL
Date Analyzed:	02/27/2007 1803			Final Weight/Volume:	5 mL
Date Prepared:	02/27/2007 1803				
Date Leached:	02/26/2007 1600				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Benzene		0.011	U Q	0.011	0.020
Carbon tetrachloride		0.018	U Q	0.018	0.020
Chlorobenzene		0.0082	U Q	0.0082	0.020
Chloroform		0.010	U Q	0.010	0.020
1,2-Dichloroethane		0.0056	U Q	0.0056	0.020
1,1-Dichloroethene		0.019	U Q	0.019	0.020
Methyl Ethyl Ketone		0.014	U Q	0.014	0.10
Tetrachloroethene		0.015	U Q	0.015	0.020
Trichloroethene		0.014	U Q	0.014	0.020
Vinyl chloride		0.018	U Q	0.018	0.040
Surrogate		%Rec		Acceptance Limits	
4-Bromofluorobenzene		103		77 - 120	
Dibromofluoromethane		100		75 - 123	
Toluene-d8 (Surr)		102		79 - 122	

Analytical Data

Job Number: 660-14036-1

Client: EQ of Florida

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2

Client Matrix: Solid

Date Sampled: 02/08/2007 1205

Date Received: 02/20/2007 1253

8260B Volatile Organic Compounds by GC/MS -TCLP

Method:	8260B	Analysis Batch: 680-68567	Instrument ID:	GC/MS Volatiles - O
Preparation:	5030B		Lab File ID:	o5111.d
Dilution:	20	Leachate Batch: 680-68491	Initial Weight/Volume:	5 mL
Date Analyzed:	02/27/2007 1823		Final Weight/Volume:	5 mL
Date Prepared:	02/27/2007 1823			
Date Leached:	02/26/2007 1600			

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Benzene		0.011	U Q	0.011	0.020
Carbon tetrachloride		0.018	U Q	0.018	0.020
Chlorobenzene		0.0082	U Q	0.0082	0.020
Chloroform		0.010	U Q	0.010	0.020
1,2-Dichloroethane		0.0056	U Q	0.0056	0.020
1,1-Dichloroethene		0.019	U Q	0.019	0.020
Methyl Ethyl Ketone		0.014	U Q	0.014	0.10
Tetrachloroethene		0.015	U Q	0.015	0.020
Trichloroethene		0.014	U Q	0.014	0.020
Vinyl chloride		0.018	U Q	0.018	0.040
Surrogate		%Rec		Acceptance Limits	
4-Bromofluorobenzene		101		77 - 120	
Dibromofluoromethane		98		75 - 123	
Toluene-d8 (Surr)		101		79 - 122	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1

Client Matrix: Solid

Date Sampled: 02/08/2007 1221

Date Received: 02/20/2007 1253

8270C Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS) -TCLP

Method:	B270C	Analysis Batch:	660-40095	Instrument ID:	BSMC5973
Preparation:	3520C	Prep Batch:	660-39708	Lab File ID:	1CC01015.D
Dilution:	1.0			Initial Weight/Volume:	200 mL
Date Analyzed:	03/01/2007 2038			Final Weight/Volume:	1 mL
Date Prepared:	02/23/2007 1428			Injection Volume:	

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Pyridine		0.043	U	0.043	1.3
Pentachlorophenol		0.028	U	0.028	1.3
Nitrobenzene		0.031	U	0.031	0.25
Hexachloroethane		0.032	U	0.032	0.25
Hexachlorobutadiene		0.032	U	0.032	0.25
Hexachlorobenzene		0.024	U	0.024	0.25
2-Methylphenol		0.033	U	0.033	0.25
3 & 4 Methylphenol		0.033	U	0.033	0.25
1,4-Dichlorobenzene		0.027	U	0.027	0.25
2,4-Dinitrotoluene		0.027	U	0.027	0.25
2,4,5-Trichlorophenol		0.034	U	0.034	0.25
2,4,6-Trichlorophenol		0.024	U	0.024	0.25
Surrogate		%Rec		Acceptance Limits	
2,4,6-Tribromophenol		54		39 - 146	
2-Fluorophenol		55		29 - 121	
Phenol-d5		53		25 - 126	
Nitrobenzene-d5		74		32 - 131	
2-Fluorobiphenyl		70		40 - 129	
Terphenyl-d14		23		10 - 149	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2

Client Matrix: Solid

Date Sampled: 02/08/2007 1205

Date Received: 02/20/2007 1253

8270C Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS) -TCLP

Method: 8270C
 Preparation: 3520C
 Dilution: 1.0
 Date Analyzed: 03/01/2007 2103
 Date Prepared: 02/23/2007 1428

Analysis Batch: 660-40095
 Prep Batch: 660-39708

Instrument ID: BSMC5973
 Lab File ID: 1CC01016.D
 Initial Weight/Volume: 200 mL
 Final Weight/Volume: 1 mL
 Injection Volume:

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Pyridine		0.043	U	0.043	1.3
Pentachlorophenol		0.028	U	0.028	1.3
Nitrobenzene		0.031	U	0.031	0.25
Hexachloroethane		0.032	U	0.032	0.25
Hexachlorobutadiene		0.032	U	0.032	0.25
Hexachlorobenzene		0.024	U	0.024	0.25
2-Methylphenol		0.033	U	0.033	0.25
3 & 4 Methylphenol		0.033	U	0.033	0.25
1,4-Dichlorobenzene		0.027	U	0.027	0.25
2,4-Dinitrotoluene		0.027	U	0.027	0.25
2,4,5-Trichlorophenol		0.034	U	0.034	0.25
2,4,6-Trichlorophenol		0.024	U	0.024	0.25
Surrogate		%Rec		Acceptance Limits	
2,4,6-Tribromophenol		57		39 - 146	
2-Fluorophenol		44		29 - 121	
Phenol-d5		40		25 - 126	
Nitrobenzene-d5		67		32 - 131	
2-Fluorobiphenyl		75		40 - 129	
Terphenyl-d14		23		10 - 149	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1

Client Matrix: Solid

Date Sampled: 02/08/2007 1221

Date Received: 02/20/2007 1253

8081A Organochlorine Pesticides by Gas Chromatography -TCLP

Method: 8081A

Analysis Batch: 660-40098

Instrument ID: AGILENT GC ECD/ECD

Preparation: 3510C

Prep Batch: 660-39747

Lab File ID: 1C01J043.D

Dilution: 1.0

Initial Weight/Volume: 20 mL

Date Analyzed: 03/02/2007 0415

Final Weight/Volume: 2 mL

Date Prepared: 02/26/2007 0840

Injection Volume:

Column ID: PRIMARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Endrin		0.00061	U	0.00061	0.0050
gamma-BHC (Lindane)		0.00021	U	0.00021	0.0025
Methoxychlor		0.00044	U	0.00044	0.025
Chlordane (technical)		0.0034	U	0.0034	0.025
Toxaphene		0.019	U	0.019	0.25
Heptachlor		0.00036	U	0.00036	0.0025
Heptachlor epoxide		0.00022	U	0.00022	0.0025
Surrogate		%Rec		Acceptance Limits	
DCB Decachlorobiphenyl		73		30 - 150	
Tetrachloro-m-xylene		56		30 - 150	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2

Client Matrix: Solid

Date Sampled: 02/08/2007 1205

Date Received: 02/20/2007 1253

8081A Organochlorine Pesticides by Gas Chromatography -TCLP

Method:	8081A	Analysis Batch: 660-40098	Instrument ID:	AGILENT GC ECD/ECD
Preparation:	3510C	Prep Batch: 660-39747	Lab File ID:	1C01J046.D
Dilution:	1.0		Initial Weight/Volume:	20 mL
Date Analyzed:	03/02/2007 0514		Final Weight/Volume:	2 mL
Date Prepared:	02/26/2007 0840		Injection Volume:	
			Column ID:	PRIMARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Endrin		0.00061	U	0.00061	0.0050
gamma-BHC (Lindane)		0.00021	U	0.00021	0.0025
Methoxychlor		0.00044	U	0.00044	0.025
Chlordane (technical)		0.0034	U	0.0034	0.025
Toxaphene		0.019	U	0.019	0.25
Heptachlor		0.00036	U	0.00036	0.0025
Heptachlor epoxide		0.00022	U	0.00022	0.0025
Surrogate		%Rec		Acceptance Limits	
DCB Decachlorobiphenyl		53		30 - 150	
Tetrachloro-m-xylene		50		30 - 150	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1

Client Matrix: Solid

Date Sampled: 02/08/2007 1221

Date Received: 02/20/2007 1253

8151A Chlorinated Herbicides by GC -TCLP

Method: 8151A

Analysis Batch: 660-40109

Instrument ID: AGILENT GC ECD/ECD

Preparation: 8151A

Prep Batch: 660-39746

Lab File ID: 1B28J063.D

Dilution: 1.0

Initial Weight/Volume: 10 mL

Date Analyzed: 03/01/2007 0840

Final Weight/Volume: 2 mL

Date Prepared: 02/26/2007 0804

Injection Volume:

Column ID: PRIMARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
2,4-D		0.0075	U	0.0075	0.025
Silvex (2,4,5-TP)		0.0016	U	0.0016	0.025
Surrogate		%Rec		Acceptance Limits	
2,4-Dichlorophenylacetic acid		61		33 - 120	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2

Client Matrix: Solid

Date Sampled: 02/08/2007 1205

Date Received: 02/20/2007 1253

8151A Chlorinated Herbicides by GC -TCLP

Method: 8151A

Analysis Batch: 660-40109

Instrument ID: AGILENT GC ECD/ECD

Preparation: 8151A

Prep Batch: 660-39746

Lab File ID: 1B28J066.D

Dilution: 1.0

Initial Weight/Volume: 10 mL

Date Analyzed: 03/01/2007 0933

Final Weight/Volume: 2 mL

Date Prepared: 02/26/2007 0804

Injection Volume:

Column ID: PRIMARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
2,4-D		0.0075	U	0.0075	0.025
Silvex (2,4,5-TP)		0.0016	U	0.0016	0.025
Surrogate		%Rec		Acceptance Limits	
2,4-Dichlorophenylacetic acid		76		33 - 120	

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1
Client Matrix: SolidDate Sampled: 02/08/2007 1221
Date Received: 02/20/2007 1253

6010B Inductively Coupled Plasma - Atomic Emission Spectrometry-TCLP

Method:	6010B	Analysis Batch:	660-39677	Instrument ID:	TJA ICP
Preparation:	3010A	Prep Batch:	660-39631	Lab File ID:	7B23B
Dilution:	5.0	Leachate Batch:	660-39625	Initial Weight/Volume:	50 mL
Date Analyzed:	02/23/2007 0830			Final Weight/Volume:	50 mL
Date Prepared:	02/22/2007 1326				
Date Leached:	02/22/2007 1255				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Silver		0.048	U	0.048	0.50
Arsenic		0.12	U	0.12	1.0
Barium		0.17	I	0.030	0.50
Cadmium		0.018	U	0.018	0.50
Chromium		0.043	U	0.043	1.0
Lead		0.040	U	0.040	1.0
Selenium		0.15	U	0.15	0.50

7470A Mercury in Liquid Waste (Manual Cold Vapor Technique)-TCLP

Method:	7470A	Analysis Batch:	660-39699	Instrument ID:	HydraAA Mercury
Preparation:	7470A	Prep Batch:	660-39658	Lab File ID:	N/A
Dilution:	1.0	Leachate Batch:	660-39625	Initial Weight/Volume:	50.0 mL
Date Analyzed:	02/23/2007 1237			Final Weight/Volume:	50.0 mL
Date Prepared:	02/22/2007 1726				
Date Leached:	02/22/2007 1255				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Mercury		0.00036	U	0.00036	0.00050

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2
Client Matrix: Solid

Date Sampled: 02/08/2007 1205
Date Received: 02/20/2007 1253

6010B Inductively Coupled Plasma - Atomic Emission Spectrometry-TCLP

Method:	6010B	Analysis Batch:	660-39677	Instrument ID:	TJA ICP
Preparation:	3010A	Prep Batch:	660-39631	Lab File ID:	7B23B
Dilution:	5.0	Leachate Batch:	660-39625	Initial Weight/Volume:	50 mL
Date Analyzed:	02/23/2007 0844			Final Weight/Volume:	50 mL
Date Prepared:	02/22/2007 1326				
Date Leached:	02/22/2007 1255				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Silver		0.048	U	0.048	0.50
Arsenic		0.12	U	0.12	1.0
Barium		0.42	I	0.030	0.50
Cadmium		0.018	U	0.018	0.50
Chromium		0.043	U	0.043	1.0
Lead		0.040	U	0.040	1.0
Selenium		0.15	U	0.15	0.50

7470A Mercury in Liquid Waste (Manual Cold Vapor Technique)-TCLP

Method:	7470A	Analysis Batch:	660-39699	Instrument ID:	HydraAA Mercury
Preparation:	7470A	Prep Batch:	660-39658	Lab File ID:	N/A
Dilution:	1.0	Leachate Batch:	660-39625	Initial Weight/Volume:	50.0 mL
Date Analyzed:	02/23/2007 1239			Final Weight/Volume:	50.0 mL
Date Prepared:	02/22/2007 1726				
Date Leached:	02/22/2007 1255				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	MDL	PQL
Mercury		0.00036	U	0.00036	0.00050

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

General Chemistry

Client Sample ID: MDF/LDF Fiberboard

Lab Sample ID: 660-14036-1

Date Sampled: 02/08/2007 1221

Client Matrix: Solid

Date Received: 02/20/2007 1253

Analyte	Result	Qual	Units	MDL	PQL	Dil	Method
Sulfide, Reactive	54	U Q	mg/Kg	54	54	1.0	9034
	Any Batch: 680-68556	Date Analyzed	02/27/2007	1430			DryWt Corrected: N
	Prep Batch: 680-68417	Date Prepared:	02/27/2007	0945			

Analyte	Result	Qual	Units	PQL	Dil	Method
Ignitability	NEG		mm/sec		1.0	1030
	Any Batch: 660-40125	Date Analyzed	03/03/2007	1500		DryWt Corrected: N

Analyte	Result	Qual	Units	PQL	PQL	Dil	Method
Cyanide, Reactive	110	U	mg/Kg	110	110	1.0	9014
	Any Batch: 680-68565	Date Analyzed	02/27/2007	1555			DryWt Corrected: N
	Prep Batch: 680-68560	Date Prepared:	02/27/2007	1010			
pH-S	5.88		SU	1.00	1.00	1.0	9045C
	Any Batch: 660-40172	Date Analyzed	03/05/2007	1315			DryWt Corrected: N

Analytical Data

Client: EQ of Florida

Job Number: 660-14036-1

General Chemistry

Client Sample ID: Purge PA2

Lab Sample ID: 660-14036-2

Client Matrix: Solid

Date Sampled: 02/08/2007 1205

Date Received: 02/20/2007 1253

Analyte	Result	Qual	Units	MDL	PQL	Dil	Method
Sulfide, Reactive	50	U Q	mg/Kg	50	50	1.0	9034
	Any Batch: 680-69427	Date Analyzed	03/09/2007 1130				DryWt Corrected: N
	Prep Batch: 680-69365	Date Prepared:	03/09/2007 0830				

Analyte	Result	Qual	Units	Dil	Method
Ignitability	NEG		mm/sec	1.0	1030
	Any Batch: 660-40125	Date Analyzed	03/03/2007 1500		DryWt Corrected: N

Analyte	Result	Qual	Units	PQL	PQL	Dil	Method
Cyanide, Reactive	100	U	mg/Kg	100	100	1.0	9014
	Any Batch: 680-69457	Date Analyzed	03/09/2007 1405				DryWt Corrected: N
	Prep Batch: 680-69430	Date Prepared:	03/09/2007 0830				
pH-S	5.46		SU	1.00	1.00	1.0	9045C
	Any Batch: 660-40172	Date Analyzed	03/05/2007 1315				DryWt Corrected: N

DATA REPORTING QUALIFIERS

Client: EQ of Florida

Job Number: 660-14036-1

Lab Section	Qualifier	Description
GC/MS VOA		
	U	Indicates that the compound was analyzed for but not detected.
	Q	Sample held beyond the accepted holding time.
GC/MS Semi VOA		
	U	Indicates that the compound was analyzed for but not detected.
GC Semi VOA		
	U	Indicates that the compound was analyzed for but not detected.
Metals		
	U	Indicates that the compound was analyzed for but not detected.
	I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
General Chemistry		
	U	Indicates that the compound was analyzed for but not detected.
	Q	Sample held beyond the accepted holding time.

QUALITY CONTROL RESULTS

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 680-68567

Method: 8260B

Preparation: 5030B

TCLP

Lab Sample ID: MB 680-68491/1-AA

Analysis Batch: 680-68567

Instrument ID: GC/MS Volatiles - O

Client Matrix: Solid

Prep Batch: N/A

Lab File ID: o5106.d

Dilution: 20

Units: mg/L

Initial Weight/Volume: 5 mL

Date Analyzed: 02/27/2007 1642

Date Prepared: 02/27/2007 1642

Final Weight/Volume: 5 mL

Date Leached: 02/26/2007 1600

Leachate Batch: 680-68491

Analyte	Result	Qual	MDL	PQL
Benzene	0.011	U	0.011	0.020
Carbon tetrachloride	0.018	U	0.018	0.020
Chlorobenzene	0.0082	U	0.0082	0.020
Chloroform	0.010	U	0.010	0.020
1,2-Dichloroethane	0.0056	U	0.0056	0.020
1,1-Dichloroethene	0.019	U	0.019	0.020
Methyl Ethyl Ketone	0.014	U	0.014	0.10
Tetrachloroethene	0.015	U	0.015	0.020
Trichloroethene	0.014	U	0.014	0.020
Vinyl chloride	0.018	U	0.018	0.040
Surrogate	% Rec	Acceptance Limits		
4-Bromofluorobenzene	103	77 - 120		
Dibromofluoromethane	95	75 - 123		
Toluene-d8 (Surr)	102	79 - 122		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Job Number: 660-14036-1

Lab Control Spike - Batch: 680-68567

Method: 8260B
Preparation: 5030B
TCLP

Lab Sample ID: LCS 680-68567/17
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 1012
Date Prepared: 02/27/2007 1012

Analysis Batch: 680-68567
Prep Batch: N/A
Units: mg/L

Instrument ID: GC/MS Volatiles - O
Lab File ID: oq456.d
Initial Weight/Volume: 5 mL
Final Weight/Volume: 5 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Benzene	0.0500	0.0510	102	74 - 122	
Carbon tetrachloride	0.0500	0.0555	111	64 - 137	
Chlorobenzene	0.0500	0.0504	101	75 - 123	
Chloroform	0.0500	0.0510	102	74 - 124	
1,2-Dichloroethane	0.0500	0.0509	102	68 - 130	
1,1-Dichloroethene	0.0500	0.0499	100	64 - 132	
Methyl Ethyl Ketone	0.100	0.0924	92	51 - 142	
Tetrachloroethene	0.0500	0.0512	102	70 - 133	
Trichloroethene	0.0500	0.0496	99	75 - 122	
Vinyl chloride	0.0500	0.0493	99	59 - 136	
Surrogate	% Rec		Acceptance Limits		
4-Bromofluorobenzene	100		77 - 120		
Dibromofluoromethane	102		75 - 123		
Toluene-d8 (Surr)	102		79 - 122		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 660-39708

Method: 8270C
Preparation: 3520C
TCLP

Lab Sample ID: MB 660-39708/1-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 0440
Date Prepared: 02/23/2007 1428

Analysis Batch: 660-40095
Prep Batch: 660-39708
Units: mg/L

Instrument ID: BSMC5973
Lab File ID: 1CB26030.D
Initial Weight/Volume: 1000 mL
Final Weight/Volume: 1 mL
Injection Volume:

Analyte	Result	Qual	MDL	PQL
Pyridine	0.0086	U	0.0086	0.25
Pentachlorophenol	0.0056	U	0.0056	0.25
Nitrobenzene	0.0061	U	0.0061	0.050
Hexachloroethane	0.0063	U	0.0063	0.050
Hexachlorobutadiene	0.0063	U	0.0063	0.050
Hexachlorobenzene	0.0048	U	0.0048	0.050
2-Methylphenol	0.0066	U	0.0066	0.050
3 & 4 Methylphenol	0.0066	U	0.0066	0.050
1,4-Dichlorobenzene	0.0054	U	0.0054	0.050
2,4-Dinitrotoluene	0.0054	U	0.0054	0.050
2,4,5-Trichlorophenol	0.0068	U	0.0068	0.050
2,4,6-Trichlorophenol	0.0048	U	0.0048	0.050
Surrogate	% Rec	Acceptance Limits		
2,4,6-Tribromophenol	62	39 - 146		
2-Fluorophenol	64	29 - 121		
Phenol-d5	57	25 - 126		
Nitrobenzene-d5	74	32 - 131		
2-Fluorobiphenyl	79	40 - 129		
Terphenyl-d14	71	10 - 149		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Lab Control Spike/
Lab Control Spike Duplicate Recovery Report - Batch: 660-39708

Method: 8270C
Preparation: 3520C
TCLP

LCS Lab Sample ID: LCS 660-39708/2-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 0505
Date Prepared: 02/23/2007 1428

Analysis Batch: 660-40095
Prep Batch: 660-39708
Units: mg/L

Instrument ID: BSMC5973
Lab File ID: 1CB26031.D
Initial Weight/Volume: 1000 mL
Final Weight/Volume: 1 mL
Injection Volume:

LCSD Lab Sample ID: LCSD 660-39708/3-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 0530
Date Prepared: 02/23/2007 1428

Analysis Batch: 660-40095
Prep Batch: 660-39708
Units: mg/L

Instrument ID: BSMC5973
Lab File ID: 1CB26032.D
Initial Weight/Volume: 1000 mL
Final Weight/Volume: 1 mL
Injection Volume:

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Pyridine	34	40	10 - 134	17	50		
Pentachlorophenol	54	56	34 - 148	4	33		
Nitrobenzene	72	78	34 - 124	8	21		
Hexachloroethane	64	70	21 - 94	8	35		
Hexachlorobutadiene	63	66	26 - 104	4	30		
Hexachlorobenzene	65	72	33 - 124	11	31		
2-Methylphenol	68	78	38 - 118	13	27		
3 & 4 Methylphenol	62	72	38 - 118	14	27		
1,4-Dichlorobenzene	66	71	30 - 95	7	31		
2,4-Dinitrotoluene	56	59	36 - 129	5	32		
2,4,5-Trichlorophenol	74	79	46 - 128	6	28		
2,4,6-Trichlorophenol	62	64	47 - 124	3	22		

Analyte	Sample Result/Qual	Spike Amount	Result	% Rec.	Limit	Qual
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Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 660-39747

Method: 8081A
Preparation: 3510C
TCLP

Lab Sample ID: MB 660-39747/1-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/01/2007 2022
Date Prepared: 02/26/2007 0840

Analysis Batch: 660-40098
Prep Batch: 660-39747
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1C01J019.D
Initial Weight/Volume: 20 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	MDL	PQL
Endrin	0.00061	U	0.00061	0.0050
gamma-BHC (Lindane)	0.00021	U	0.00021	0.0025
Methoxychlor	0.00044	U	0.00044	0.025
Chlordane (technical)	0.0034	U	0.0034	0.025
Toxaphene	0.019	U	0.019	0.25
Heptachlor	0.00036	U	0.00036	0.0025
Heptachlor epoxide	0.00022	U	0.00022	0.0025

Surrogate	% Rec	Acceptance Limits
DCB Decachlorobiphenyl	66	30 - 150
Tetrachloro-m-xylene	66	30 - 150

Lab Control Spike/
Lab Control Spike Duplicate Recovery Report - Batch: 660-39747

Method: 8081A
Preparation: 3510C
TCLP

LCS Lab Sample ID: LCS 660-39747/2-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/01/2007 2042
Date Prepared: 02/26/2007 0840

Analysis Batch: 660-40098
Prep Batch: 660-39747
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1C01J020.D
Initial Weight/Volume: 20 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

LCSD Lab Sample ID: LCSD 660-39747/3-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/01/2007 2101
Date Prepared: 02/26/2007 0840

Analysis Batch: 660-40098
Prep Batch: 660-39747
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1C01J021.D
Initial Weight/Volume: 20 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Endrin	87	83	36 - 137	4	25		
gamma-BHC (Lindane)	84	80	24 - 118	5	36		
Heptachlor	83	79	34 - 114	4	26		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 660-39746

Method: 8151A
Preparation: 8151A
TCLP

Lab Sample ID: MB 660-39746/1-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/01/2007 0654
Date Prepared: 02/26/2007 0804

Analysis Batch: 660-40109
Prep Batch: 660-39746
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1B28J057.D
Initial Weight/Volume: 500 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	MDL	PQL
2,4-D	0.00015	U	0.00015	0.00050
Silvex (2,4,5-TP)	0.000032	U	0.000032	0.00050
Surrogate	% Rec	Acceptance Limits		
2,4-Dichlorophenylacetic acid	51	33 - 120		

Lab Control Spike/
Lab Control Spike Duplicate Recovery Report - Batch: 660-39746

Method: 8151A
Preparation: 8151A
TCLP

LCS Lab Sample ID: LCS 660-39746/2-AA
Client Matrix: Solid
Dilution: 2.0
Date Analyzed: 03/01/2007 1032
Date Prepared: 02/26/2007 0804

Analysis Batch: 660-40109
Prep Batch: 660-39746
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1B28J068.D
Initial Weight/Volume: 500 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

LCSD Lab Sample ID: LCSD 660-39746/3-AA
Client Matrix: Solid
Dilution: 2.0
Date Analyzed: 03/01/2007 1050
Date Prepared: 02/26/2007 0804

Analysis Batch: 660-40109
Prep Batch: 660-39746
Units: mg/L

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1B28J069.D
Initial Weight/Volume: 500 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
2,4-D	79	92	10 - 166	16	78		
Silvex (2,4,5-TP)	96	99	25 - 139	3	66		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Matrix Spike/
Matrix Spike Duplicate Recovery Report - Batch: 660-39746

Method: 8151A
Preparation: 8151A
TCLP

MS Lab Sample ID: 660-14036-1
Client Matrix: Solid
Dilution: 2.0
Date Analyzed: 03/01/2007 1107
Date Prepared: 02/26/2007 0804

Analysis Batch: 660-40109
Prep Batch: 660-39746

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1B28J070.D
Initial Weight/Volume: 10 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

MSD Lab Sample ID: 660-14036-1
Client Matrix: Solid
Dilution: 2.0
Date Analyzed: 03/01/2007 1125
Date Prepared: 02/26/2007 0804

Analysis Batch: 660-40109
Prep Batch: 660-39746

Instrument ID: AGILENT GC ECD/ECD
Lab File ID: 1B28J071.D
Initial Weight/Volume: 10 mL
Final Weight/Volume: 2 mL
Injection Volume:
Column ID: PRIMARY

Analyte	% Rec.		Limit	RPD	RPD Limit	MS Qual	MSD Qual
	MS	MSD					
2,4-D	91	107	10 - 166	16	78		
Silvex (2,4,5-TP)	114	86	25 - 139	28	66		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

TCLP SPLPE Leachate Blank - Batch: 660-39631

Method: 6010B
Preparation: 3010A
TCLP

Lab Sample ID: LB 660-39625/1-AB
Client Matrix: Solid
Dilution: 5.0
Date Analyzed: 02/23/2007 0812
Date Prepared: 02/22/2007 1326
Date Leached: 02/22/2007 1255

Analysis Batch: 660-39677
Prep Batch: 660-39631
Units: mg/L

Instrument ID: TJA ICP
Lab File ID: 7B23B
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Leachate Batch: 660-39625

Analyte	Result	Qual	MDL	PQL
Silver	0.048	U	0.048	0.50
Arsenic	0.12	U	0.12	1.0
Barium	0.030	U	0.030	0.50
Cadmium	0.018	U	0.018	0.50
Chromium	0.043	U	0.043	1.0
Lead	0.040	U	0.040	1.0
Selenium	0.15	U	0.15	0.50

Lab Control Spike/ Lab Control Spike Duplicate Recovery Report - Batch: 660-39631

Method: 6010B
Preparation: 3010A
TCLP

LCS Lab Sample ID: LCS 660-39631/2-AA
Client Matrix: Solid
Dilution: 5.0
Date Analyzed: 02/23/2007 0816
Date Prepared: 02/22/2007 1326

Analysis Batch: 660-39677
Prep Batch: 660-39631
Units: mg/L

Instrument ID: TJA ICP
Lab File ID: 7B23B
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

LCSD Lab Sample ID: LCSD 660-39631/3-AA
Client Matrix: Solid
Dilution: 5.0
Date Analyzed: 02/23/2007 0821
Date Prepared: 02/22/2007 1326

Analysis Batch: 660-39677
Prep Batch: 660-39631
Units: mg/L

Instrument ID: TJA ICP
Lab File ID: 7B23B
Initial Weight/Volume: 50 mL
Final Weight/Volume: 50 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Silver	103	104	75 - 125	1	20		
Arsenic	104	104	75 - 125	1	20		
Barium	102	104	75 - 125	2	20		
Cadmium	108	109	75 - 125	1	20		
Chromium	104	105	75 - 125	1	20		
Lead	105	106	75 - 125	1	20		
Selenium	103	104	75 - 125	2	20		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Matrix Spike/

Matrix Spike Duplicate Recovery Report - Batch: 660-39631

Method: 6010B

Preparation: 3010A

TCLP

MS Lab Sample ID: 660-14036-1 Analysis Batch: 660-39677
 Client Matrix: Solid Prep Batch: 660-39631
 Dilution: 5.0
 Date Analyzed: 02/23/2007 0835
 Date Prepared: 02/22/2007 1326
 Date Leached: 02/22/2007 1255 Leachate Batch: 660-39625

Instrument ID: TJA ICP
 Lab File ID: 7B23B
 Initial Weight/Volume: 50 mL
 Final Weight/Volume: 50 mL

MSD Lab Sample ID: 660-14036-1 Analysis Batch: 660-39677
 Client Matrix: Solid Prep Batch: 660-39631
 Dilution: 5.0
 Date Analyzed: 02/23/2007 0840
 Date Prepared: 02/22/2007 1326
 Date Leached: 02/22/2007 1255 Leachate Batch: 660-39625

Instrument ID: TJA ICP
 Lab File ID: 7B23B
 Initial Weight/Volume: 50 mL
 Final Weight/Volume: 50 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	MS Qual	MSD Qual
	MS	MSD					
Silver	102	103	75 - 125	1	20		
Arsenic	104	104	75 - 125	0	20		
Barium	101	102	75 - 125	1	20		
Cadmium	107	107	75 - 125	1	20		
Chromium	104	105	75 - 125	1	20		
Lead	105	105	75 - 125	0	20		
Selenium	101	103	75 - 125	2	20		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

TCLP SPLPE Leachate Blank - Batch: 660-39658

Method: 7470A

Preparation: 7470A

TCLP

Lab Sample ID: LB 660-39625/1-AC

Analysis Batch: 660-39699

Instrument ID: HydraAA Mercury Analyzer

Client Matrix: Solid

Prep Batch: 660-39658

Lab File ID: N/A

Dilution: 1.0

Units: mg/L

Initial Weight/Volume: 50.0 mL

Date Analyzed: 02/23/2007 1217

Date Prepared: 02/22/2007 1726

Final Weight/Volume: 50.0 mL

Date Leached: 02/22/2007 1255

Leachate Batch: 660-39625

Analyte	Result	Qual	MDL	PQL
Mercury	0.00036	U	0.00036	0.00050

Lab Control Spike/

Lab Control Spike Duplicate Recovery Report - Batch: 660-39658

Method: 7470A

Preparation: 7470A

TCLP

LCS Lab Sample ID: LCS 660-39658/2-AA

Analysis Batch: 660-39699

Instrument ID: HydraAA Mercury Analyzer

Client Matrix: Solid

Prep Batch: 660-39658

Lab File ID: N/A

Dilution: 1.0

Units: mg/L

Initial Weight/Volume: 50.0 mL

Date Analyzed: 02/23/2007 1223

Date Prepared: 02/22/2007 1726

Final Weight/Volume: 50.0 mL

LCSD Lab Sample ID: LCSD 660-39658/3-AA

Analysis Batch: 660-39699

Instrument ID: HydraAA Mercury Analyzer

Client Matrix: Solid

Prep Batch: 660-39658

Lab File ID: N/A

Dilution: 1.0

Units: mg/L

Initial Weight/Volume: 50.0 mL

Date Analyzed: 02/23/2007 1225

Date Prepared: 02/22/2007 1726

Final Weight/Volume: 50.0 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Mercury	105	111	80 - 120	5	20		

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 680-68560

Method: 9014
Preparation: 7.3.3

Lab Sample ID: MB 680-68560/6-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 1555
Date Prepared: 02/27/2007 1010

Analysis Batch: 680-68565
Prep Batch: 680-68560
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Result	Qual	PQL	PQL
Cyanide, Reactive	100	U	100	100

Lab Control Spike - Batch: 680-68560

Method: 9014
Preparation: 7.3.3

Lab Sample ID: LCS 680-68560/7-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 1555
Date Prepared: 02/27/2007 1010

Analysis Batch: 680-68565
Prep Batch: 680-68560
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Cyanide, Reactive	278	103	37	10 - 100	

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 680-69430

Method: 9014
Preparation: 7.3.3

Lab Sample ID: MB 680-69430/6-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2007 1405
Date Prepared: 03/09/2007 0830

Analysis Batch: 680-69457
Prep Batch: 680-69430
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Result	Qual	PQL	PQL
Cyanide, Reactive	100	U	100	100

Lab Control Spike - Batch: 680-69430

Method: 9014
Preparation: 7.3.3

Lab Sample ID: LCS 680-69430/7-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2007 1405
Date Prepared: 03/09/2007 0830

Analysis Batch: 680-69457
Prep Batch: 680-69430
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Cyanide, Reactive	249	84.5	34	10 - 100	U

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 680-68417

Method: 9034
Preparation: 7.3.4

Lab Sample ID: MB 680-68417/15-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 1430
Date Prepared: 02/27/2007 0945

Analysis Batch: 680-68556
Prep Batch: 680-68417
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Result	Qual	MDL	PQL
Sulfide, Reactive	50	U	50	50

Lab Control Spike - Batch: 680-68417

Method: 9034
Preparation: 7.3.4

Lab Sample ID: LCS 680-68417/16-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 02/27/2007 1430
Date Prepared: 02/27/2007 0945

Analysis Batch: 680-68556
Prep Batch: 680-68417
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Sulfide, Reactive	2530	1920	76	40 - 100	

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Method Blank - Batch: 680-69365

Method: 9034
Preparation: 7.3.4

Lab Sample ID: MB 680-69365/11-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2007 1130
Date Prepared: 03/09/2007 0830

Analysis Batch: 680-69427
Prep Batch: 680-69365
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Result	Qual	MDL	PQL
Sulfide, Reactive	50	U	50	50

Lab Control Spike - Batch: 680-69365

Method: 9034
Preparation: 7.3.4

Lab Sample ID: LCS 680-69365/12-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2007 1130
Date Prepared: 03/09/2007 0830

Analysis Batch: 680-69427
Prep Batch: 680-69365
Units: mg/Kg

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10.00 g
Final Weight/Volume: 250 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Sulfide, Reactive	2500	1390	56	40 - 100	

Calculations are performed before rounding to avoid round-off errors in calculated results.

Quality Control Results

Client: EQ of Florida

Job Number: 660-14036-1

Lab Control Spike - Batch: 660-40172

Method: 9045C
Preparation: N/A

Lab Sample ID: LCS 660-40171/1-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/05/2007 1315
Date Prepared: N/A
Date Leached: 03/05/2007 1315

Analysis Batch: 660-40172
Prep Batch: N/A
Units: SU

Instrument ID: No Equipment Assigned
Lab File ID: N/A
Initial Weight/Volume: 10 mL
Final Weight/Volume: 10 mL

Leachate Batch: 660-40171

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
pH-S	6.00	6.070	101	63 - 158	

Calculations are performed before rounding to avoid round-off errors in calculated results.

APPENDIX L

SHREDDER AS-BUILT DOCUMENTATION



Florida Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Rick Scott
Governor

Herschel T. Vinyard Jr.
Secretary

Transmitted via email only to stuart.stapleton@egonline.com

Stuart Stapleton, Environmental Manager
EQ Florida, Inc.
7202 East 8th Avenue
Tampa, Florida 33619

July 1, 2013

**Re: EQ Florida, Inc. Waste Processing Facility, Hillsborough County
Certification of Construction Completion
Shredder Relocation and Retrofit
Permit No. 34757-006-SO/30
WACS No.: SWD/29/44633**

Dear Mr. Stapleton:

The Department has reviewed the following information prepared in support of the Certification of Construction Completion for the shredder relocation and retrofit at the EQ Florida, Inc. Waste Processing Facility:

CERTIFICATION OF CONSTRUCTION COMPLETION - FDEP Permit No. 34757-006-SO/30 - EQ Florida, Inc. Solid Waste Processing Facility..., (cover letter, DEP Form 62-701.900(2), supporting information, & record drawing), dated and received June 6, 2013, prepared by KCI Technologies.

Based on the information listed above, in accordance with the Specific Condition #B.2. of **Operation Permit No. 34757-006-SO/30**, the Department approves the certification of construction completion of the shredder relocation and retrofit and approves operation of the shredder in accordance with **Operation Permit No. 34757-006-SO/30**.

If there are points that you would like to discuss, please contact me at (813) 470-5754 or steve.morgan@dep.state.fl.us.

Sincerely

Steven G. Morgan
Waste Permitting Section
Southwest District

SM/sgm

Cc: Chris Poole, KKCI Technologies, christopher.poole@kci.com
Stephanie Watson, FDEP Tampa (e-mail)



ISO 9001:2008 CERTIFIED

ENGINEERS • PLANNERS • SCIENTISTS • CONSTRUCTION MANAGERS

10401 Highland Manor Drive, Suite 120 • Tampa, FL 33610 • Phone 813-740-2300 • Fax 813-740-0158

Mr. Steven G. Morgan
Waste Management Section
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637

June 6, 2013

Subject: CERTIFICATION OF CONSTRUCTION COMPLETION
FDEP Permit No. 34757-006-SO/30
EQ Florida, Inc. Solid Waste Processing Facility
7202 East 8th Avenue
Tampa, FL 33619

Dear Mr. Morgan:

On behalf of EQ Florida, Inc., KCI Technologies, Inc. is submitting this *Certification of Construction Completion of a Solid Waste Management Facility*, FDEP Form No. 62-701.900(2), certifying to the Department the completion of the industrial shredder relocation and retrofit/upgrade activities at the referenced facility in general accordance with the permitted minor modification.

Please do not hesitate to contact me should you require anything further and/or have any questions or comments.

Sincerely,

Christopher B. Poole, PG, CPG
Senior Associate,
SE US Geo-Environmental Practice Leader
(813) 740-2300 Ext. 122
christopher.poole@kci.com

CBP/
Attachment

ec: Mr. Anu Saxena, KCI
Mr. Stuart Stapleton, EQFL
Mr. Chuck Zuerner, EQFL



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, FL 32399-2400

DEP Form # 62-701.900(2)
Form Title Certification of Construction Completion
Effective Date May 19, 1994

DEP Application No. _____
(Filled by DEP)

Certification of Construction Completion of a Solid Waste Management Facility

DEP Construction Permit No: 34757-006-SO/30 County: Hillsborough

Name of Project: Minor Modification - Solid Waste Processing Facility EQ Florida, Inc.

Name of Owner: EQ Florida, Inc.

Name of Engineer: KCI Technologies, Inc.

Type of Project: Relocation of existing shredder to the north side of the solid waste processing building.

Retrofit and upgrade of the shredder to accommodate increased use and throughput.

Cost: Estimate \$ 25,000 Actual \$ 150,000

Site Design: Quantity: 8.9 ton/day Site Acreage: 4.53 Acres

Deviations from Plans and Application Approved by DEP: _____

Minor modification activities related to the shredder relocation and retrofit/upgrade were completed in accordance with FDEP approved Figure 11 prepared by Kleinfelder (see attached) with the exception of the deviations noted in the attached document.

Address and Telephone No. of Site: 7202 East 8th Avenue, Tampa, FL 33619; (813) 319-3410

Name(s) of Site Supervisor: Gene Cieply / General Manager

Date Site inspection is requested: N/A

This is to certify that, with the exception of any deviation noted above, the construction of the project has been completed in substantial accordance with the plans authorized by Construction

Permit No. 34757-006-SO/30 :Dated: August 8, 2012

Date: June 6, 2013

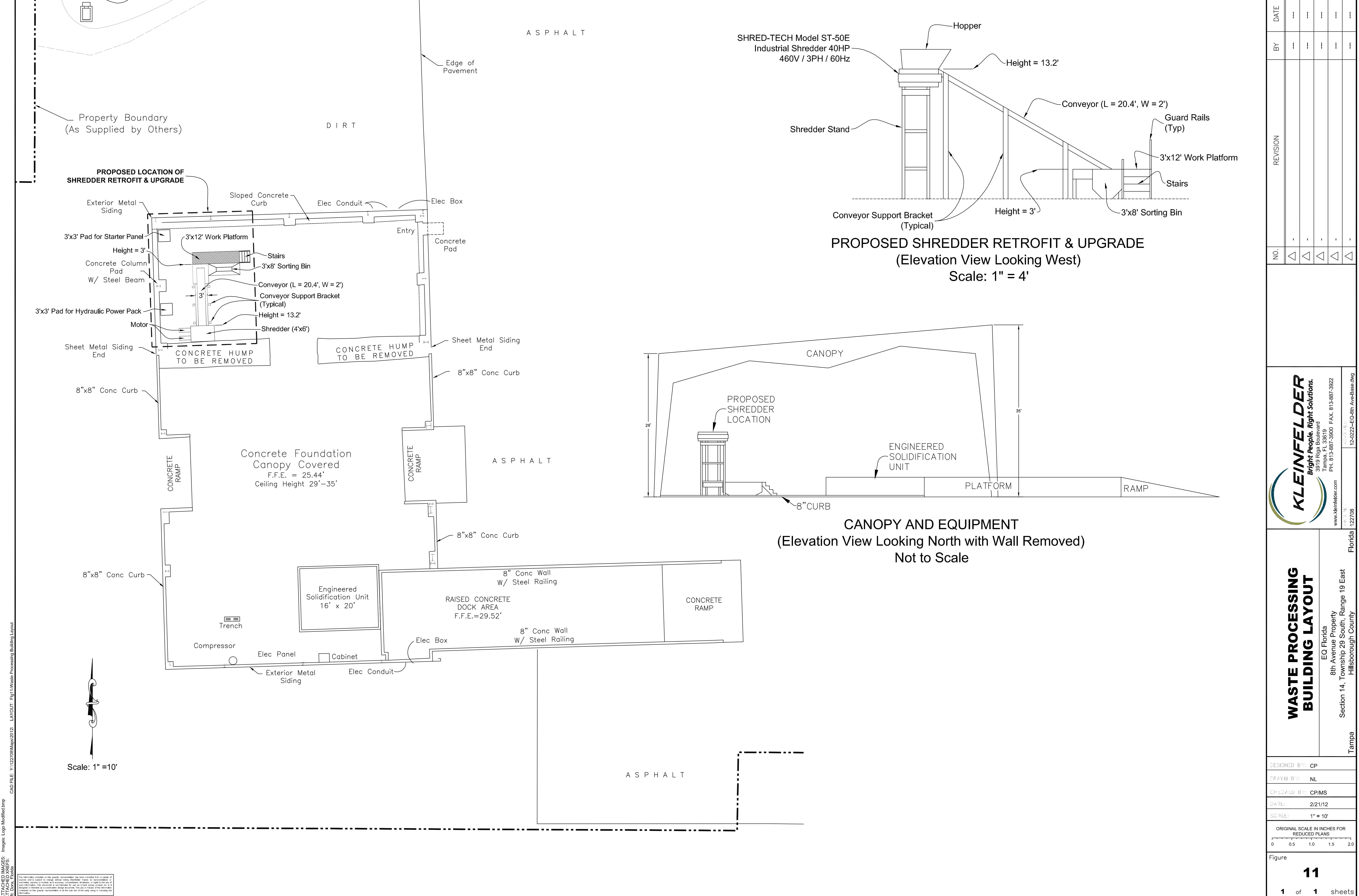
Signature: _____
Professional Engineer

Page 1 of 1

Solid Waste Processing Facility EQ Florida, Inc. Shredder/Conveyor Deviations

During the construction process the following deviations were made to satisfy various safety and ergonomic issues associated with the Shredder/Conveyor System.

- A carbon dioxide fire suppression system was installed with nozzles pointing in the shredder hopper as well as the receiving hopper under the shredder. Three fire alarm pulls were strategically located near the machine and in the building.
- The number of E-stops was expanded from one to four.
- The platform and sorting table were reconfigured to be more efficient and provide good ergonomics. The working platform dimensions w/out the stairs are width = 54", length = 10' 1", height = 28". The overall length of the platform with the stairs is 13' 6". The dimensions of the sorting table are width = 44" and length = 97". The height of the table is designed to be a comfortable working height for the sorting / loading operators (~40" from the working platform floor).
- The sorting table was retrofitted with a trough drain allowing for free liquids to be captured and transported to a 55 gallon drum.
- The overall height of the shredder and hopper is 14' 1". The top can be accessed using a movable stair ladder system.
- Water sprays were added to the conveyor to clean the conveyor belt as required.
- A camera was added so the operator can observe inside the shredder hopper during the shredding operation.



ATTACHED IMAGES: Images: Logo Modified.tmp
ATTACHED XREFS: Mt.Dora.Florida
CAD FILE: Y:\122708\Maps\2012_ LAYOUT: Epi+Waste Processing Building Layout

DATE	---	---	---	---	---	---
BY	---	---	---	---	---	---
REVISION						
NO.	△	△	△	△	△	△

KLEINFELDER
Bright People. Right Solutions.
3919 Riga Boulevard
Tampa, FL 33619
PH. 813-887-3900 FAX. 813-887-3922
www.kleinfelder.com

WASTE PROCESSING BUILDING LAYOUT

EQ Florida
8th Avenue Property
Section 14, Township 29 South, Range 19 East
Hillsborough County
Tampa
Florida 122708

DESIGNED BY: CP
DRAWN BY: NL
CHECKED BY: CP/MS
DATE: 2/21/12
SCALE: 1" = 10'
ORIGINAL SCALE IN INCHES FOR REDUCED PLANS
Figure 11
1 of 1 sheets

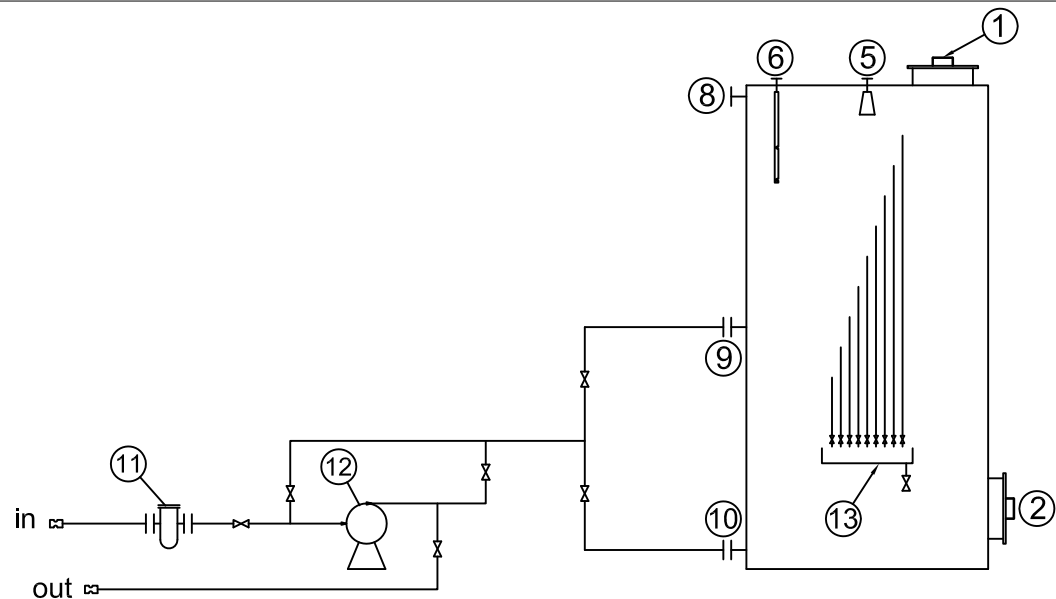
PLOTTED: 23 Feb 2012, 9:02am, lawrence

APPENDIX M

OIL-WATER SEPARATOR SYSTEM OPERATION SCHEMATIC

PROCESS

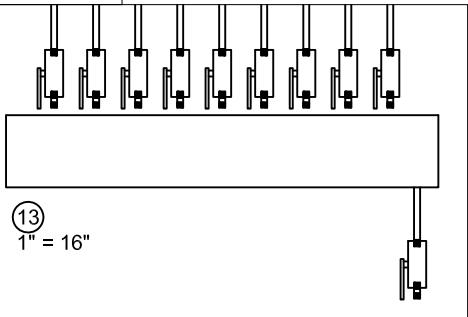
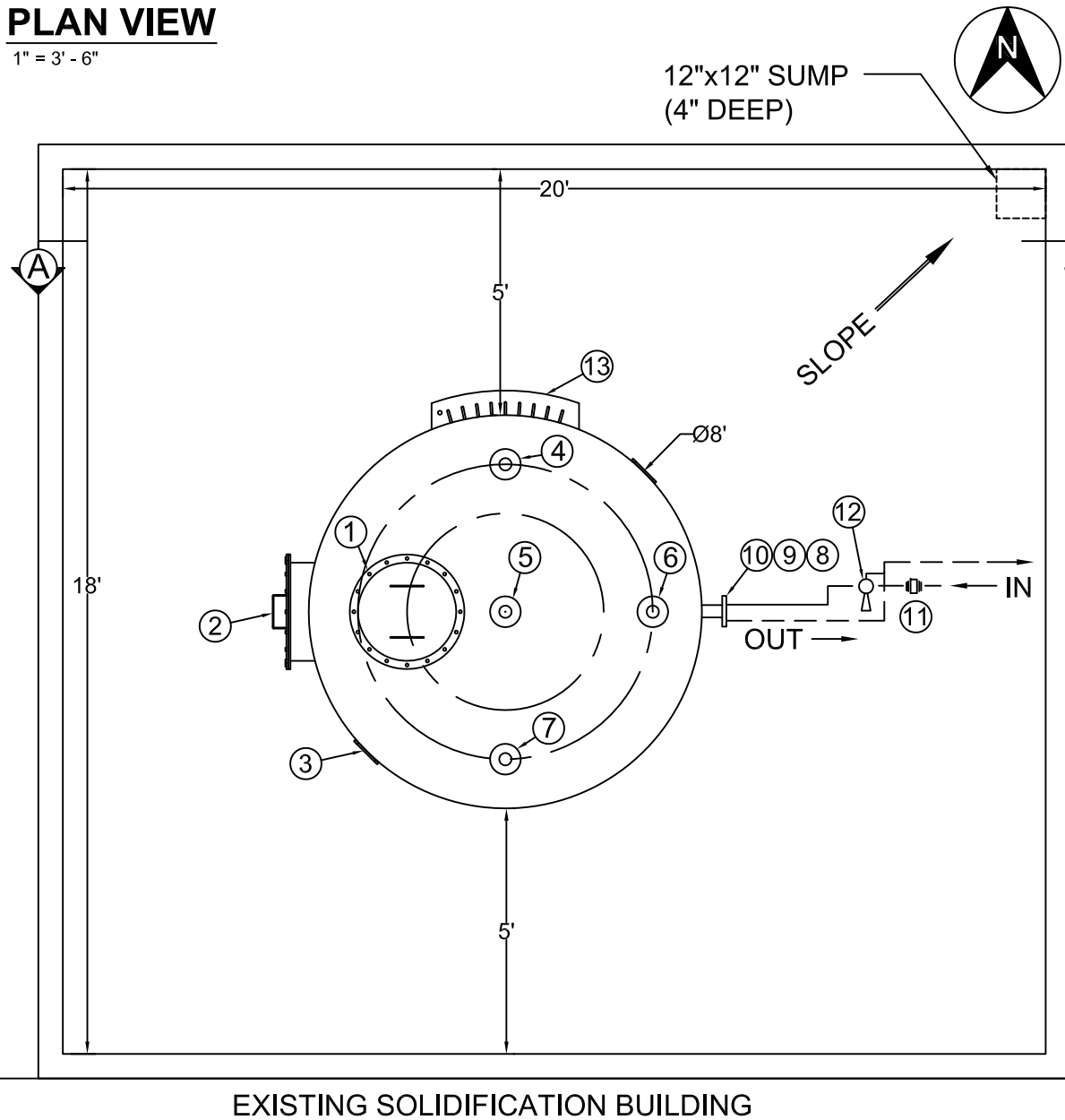
NOT TO SCALE



- ① - TOP 24" MAN-WAY
- ② - SIDE 24" MAN-WAY
- ③ - LIFT LUG (2)
- ④ - 3" FLANGE FOR SPARE
- ⑤ - 3" FLANGE FOR LIT (LEVEL INDICATOR TRANSMITTER/ULTRASONIC)
- ⑥ - 3" FLANGE FOR LSH/LSHH (LEVEL SWITCH HIGH/HIGH HIGH)
- ⑦ - 3" FLANGE FOR CONSERVATION VENT
- ⑧ - 3" FLANGE FOR OVERFLOW
- ⑨ - 3" FLANGE FOR MIDDLE FILL/DRAIN
- ⑩ - 3" FLANGE FOR BOTTOM FILL/DRAIN
- ⑪ - FILTER
- ⑫ - PUMP
- ⑬ - CATCH BASIN AND VALVES (SEE BELOW FOR DETAIL)

PLAN VIEW

1" = 3' - 6"



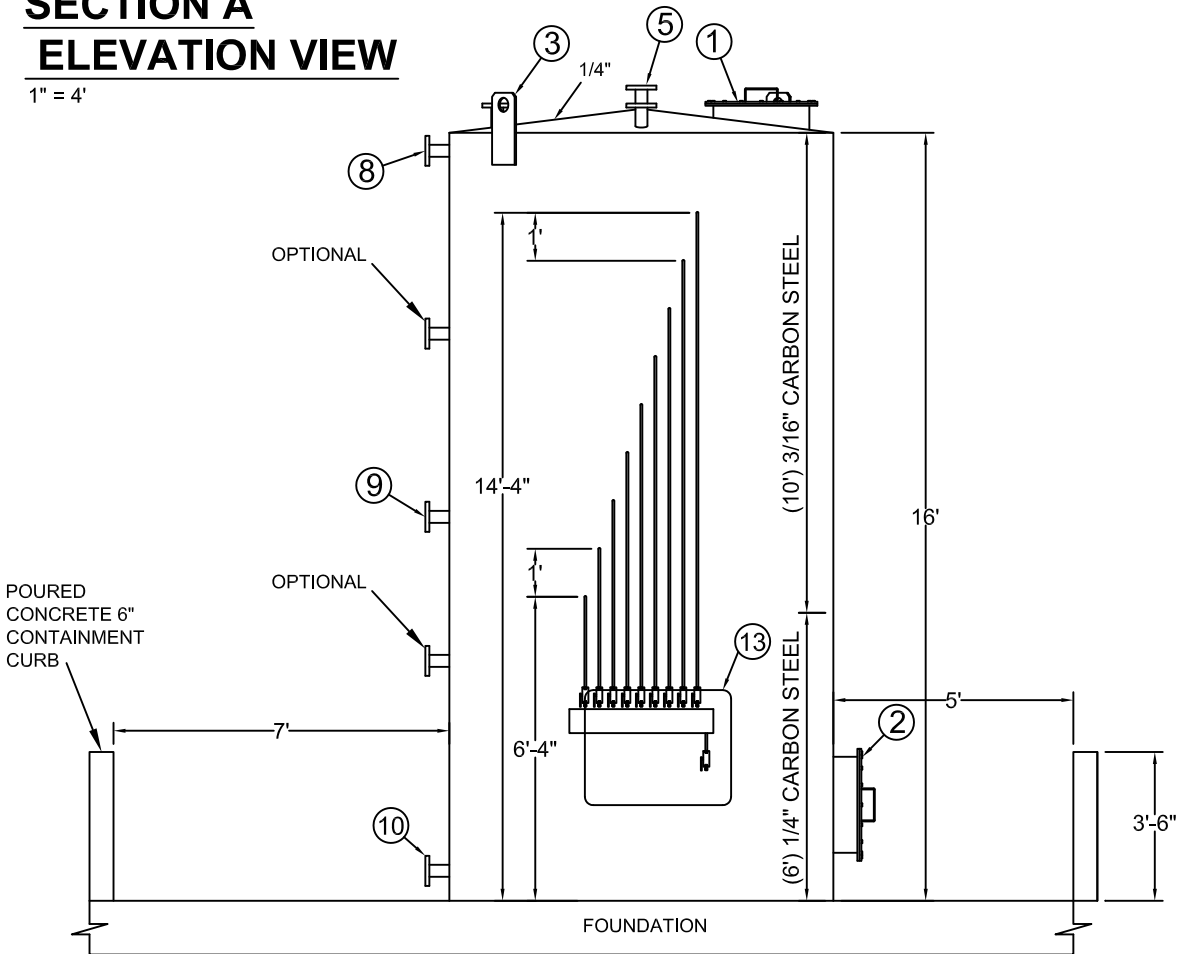
CONTAINMENT CALCULATIONS:

CONTAINMENT PLAN SIZE L x W	AVERAGE DEPTH (FEET)	AVAILABLE CONTAINMENT VOLUME (GALLONS)	LARGEST VESSEL (GALLONS)	25 YEAR RAINFALL VOLUME* (GALLONS)	REQUIRED LARGEST VESSEL PLUS RAINFALL (GALLONS)
18ft x 20ft	3.5	8770	6000	2132	8132

*RAINFALL IS BASED ON A 25 YEAR, 24 HOUR EVENT OF 9.5 INCHES

SECTION A
ELEVATION VIEW

1" = 4'



THE
ENVIRONMENTAL QUALITY
COMPANY
30225 MIDWAY AVENUE, WHITE, IL 46184
TEL. (734) 328-8000

LOGO

EQ - FLORIDA
7202 EAST EIGHTH AVE
TAMPA, FL 33619
PHONE: (813) 623-5302

EQ LOCATION

10-17-13	REVISED AVERAGE DEPTH FROM 3.1 TO 3.5; REVISED AVAILABLE VOLUME FROM 8346 TO 8770; REVISED CURB HEIGHT FROM 3'-1 1/2" TO 3.5'
DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	
DRAWN	AJR
CHECKED	
APPROVED	

PRIVILEGED AND CONFIDENTIAL

This drawing, or specification, and the designs disclosed in the drawing, and the technical data and specifications detailed with respect to the drawing, or otherwise, are confidential/proprietary matters and are the exclusive property of EQ-The Environmental Quality Company. The drawing or specifications is to be returned, to the above parties, upon written request and is not to be reproduced in whole or in part, or disclosed to anyone else without the express written consent of the aforementioned parties.

KEY PLAN

PROJECT TITLE

SHEET TITLE

OIL/WATER
SEPERATION TANK

JOB NO.

SCALE

AS NOTED

DATE

6/27/2013

SHEET NO.

1

OF