



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 13 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: RCRA Compliance Evaluation Inspection
Perma-Fix of Florida, Inc.
EPA I.D. Number FLD 980 711 071

Dear Mr. Fogleman:

On March 3, 2015, the U.S. Environmental Protection Agency conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI), along with the Florida Department of Environmental Protection (FDEP), at Perma-Fix of Florida, Inc., located in Gainesville, Florida, in order to determine its compliance status with RCRA.

Enclosed is the CEI report that indicated apparent violations of RCRA were discovered. A copy of this report has been forwarded to the Florida Department of Environmental Protection.

If you have any questions regarding the inspection, please contact Daryl Himes, of my staff, by phone at (404) 562-8614 or by email at himes.daryl@epa.gov.

Sincerely,

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

Larry L. Lamberth
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure

cc: Tim Bahr, FDEP
Jabe Breland, Northeast District, FDEP



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Timothy Bahr
Administrator, Hazardous Waste Program
Florida Department of Environmental Protection
600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: RCRA Compliance Evaluation Inspection
Perma-Fix of Florida, Inc.
EPA I.D. Number FLD 980 711 071

Dear Mr. Bahr:

On March 3, 2015, the U.S. Environmental Protection Agency accompanied by the Florida Department of Environmental Protection (FDEP), conducted a compliance evaluation inspection at the subject facility. This RCRA CEI was an EPA oversight inspection.

Enclosed is the EPA RCRA Inspection Report which indicates that potential violations of RCRA were discovered during the inspection. Pursuant to the current RCRA Enforcement Response Policy, the facility has been determined by the EPA to be a Secondary Violator. If you have any questions, please contact Daryl Himes, of my staff, at himes.daryl@epa.gov or (404) 562-8614.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry L. Lamberth", is positioned above the typed name.

Larry L. Lamberth
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure

cc: Jabe Breland, Northeast District, FDEP

1) Inspector and Author of Report

Daryl R. Himes
Environmental Engineer
US Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8614
email: himes.daryl@epa.gov

2) Facility Information

Perma-Fix of Florida, Inc. (PFF)
1940 NW 67th Place
Gainesville, Florida 32653

EPA ID. Number FLD 980 711 071

3) Responsible Official

Kurt Fogleman
Environmental Health and Safety Manager

4) Inspection Participants

Daryl R. Himes, U.S. EPA
Jabe Breland, Florida Department of Environmental Protection (FDEP)
Carrie Kruchell, FDEP
Kurt Fogleman, PFF
Randy Self, PFF

5) Date of Inspection

March 3, 2015

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k
Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927
40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, and 62-737 Florida Administrative Code (F.A.C.)

7) Purpose of Inspection

To conduct an unannounced EPA Lead Inspection and determine the facility's compliance with the applicable RCRA hazardous waste regulations.

8) Facility Description

PFF operates as a large quantity generator and storage facility of hazardous waste. Processes performed at the facility upon receiving hazardous wastes from off-site facilities include liquid and sludge bulking, scintillation vial and other small container crushing, shredding and repackaging operations. Additional operations performed include thermal desorption and/or chemical oxidation, used oil handling, contact petroleum transport and consolidation and storage of discarded devices containing mercury.

PFF performs its storage and treatment operations in several container storage areas, one tank and two miscellaneous treatment units. PFF performs its permitted operations under Permit Number 17680-010-HC issued on September 16, 2010.

All of PFF's operations are performed within a fence with access restricted.

9) Findings

Upon arriving at the facility, EPA credentials were presented to Kurt Fogleman,, the facility's Environmental, Health and Safety Manager. The purpose of the inspection and the facility's operations were then discussed.

A walk-through inspection of the facility was then performed with the findings documented below.

LSV Processing and Waste Storage Building

This area is permitted for up to 72,105 gallons of container storage of hazardous wastes with a maximum container size of 718 gallons. The area is under roof on a curbed concrete pad.

At the time of the inspection, this area was within its volume capacity limit.

Three containers were observed without a storage start dates marked on their labels. These containers were as follows:

One 35 gallon drum, identified as PF-326-H (Photo 1), was dated 2/5/14.

One 35 gallon drum, identified as PFG 048-H (Photo 2), was dated 12/2/13.

One 55 gallon drum, identified as PFG 099-H (Photos 3 and 4), was dated as 2/24/14.

PFF appeared to be in violation of 40 C.F.R. § 268.50(b) for storing land disposal restricted hazardous wastes in excess of one year.

The Area was equipped with spill dry equipment and fire extinguishers.

Processing and Storage Building

This area is permitted for up to 72,115 gallons of container storage of hazardous wastes with a maximum container size of 718 gallons. The area is under roof on a curbed concrete pad (Photos 5 and 6).

At the time of the inspection, this area was within its volume capacity limit.

At the time of the inspection, one container, identified as IND 0434 (Photo 7) was observed without a storage start date on its label. The container was subsequently marked with its storage start date of 1/5/15.

At the time of the inspection, two aisles (Photos 8 and 9) were observed to have marginal space between the rows of containers. More space was added immediately during the inspection. **It is recommended that adequate aisle space be maintained between rows of containers at all times.**

At the time of the inspection approximately 22 containers of mixed waste were present in this area with elevated radioactivity levels which had been in storage for in excess of one year. The facility had been in contact with FDEP about these containers and provided FDEP with documentation about the disposal facility status regarding these wastes.

The Area was equipped with spill dry equipment and fire extinguishers.

Treatment and Operations Building

This area is permitted for up to 35,200 gallons of container storage of hazardous wastes with a maximum container size of 718 gallons. The area is under roof on a curbed concrete pad (Photos 10 and 11) and equipped with spill dry equipment and fire extinguishers. This area utilizes seven storage zones to separate incompatible hazardous wastes. At the time of the inspection, this area was within its volume capacity limit.

At the time of the inspection, one container (Photos 12 & 13) identified as PFG-103-H was dated 2/28/14. It was subsequently determined that the actual start date of this container was 5/12/14.

At the time of the inspection, one container (Photo 14) identified as ENV 3133, was observed with a storage start date of 3/19/13 on its label. The container was subsequently marked with its storage start date of 1/5/15.

At the time of the inspection, one container (Photo 15) identified as ENV 3494, was observed without a storage start date on its label. The container was subsequently marked with its storage start date of 9/9/14.

PFF appeared to be in violation of 40 C.F.R. § 268.50(a)(2)(ii) for storing land disposal restricted hazardous wastes without being marked with a storage start date.

3000 Gallon Storage Tank

At the time of the inspection, this tank was no longer in use.

Fuel Blending Operations Area

At the time of the inspection, no fuel blending operations were being performed. No hazardous wastes were observed in this area


Lab Pack Consolidation Area.

At the time of the inspection, no lab pack decommissioning operations were being performed.
No hazardous wastes were observed in this area.

Record Review

The facility's contingency plan, manifest, inspection logs and training records were reviewed.
No apparent violations were observed.

10) Signed



Daryl R. Himes
Environmental Engineer

5/13/15
Date

11) Concurrence



Larry Lamberth
Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch

5/13/15
Date

Photographs



Photo 1 – Container in the LSV Processing and Waste Storage Building

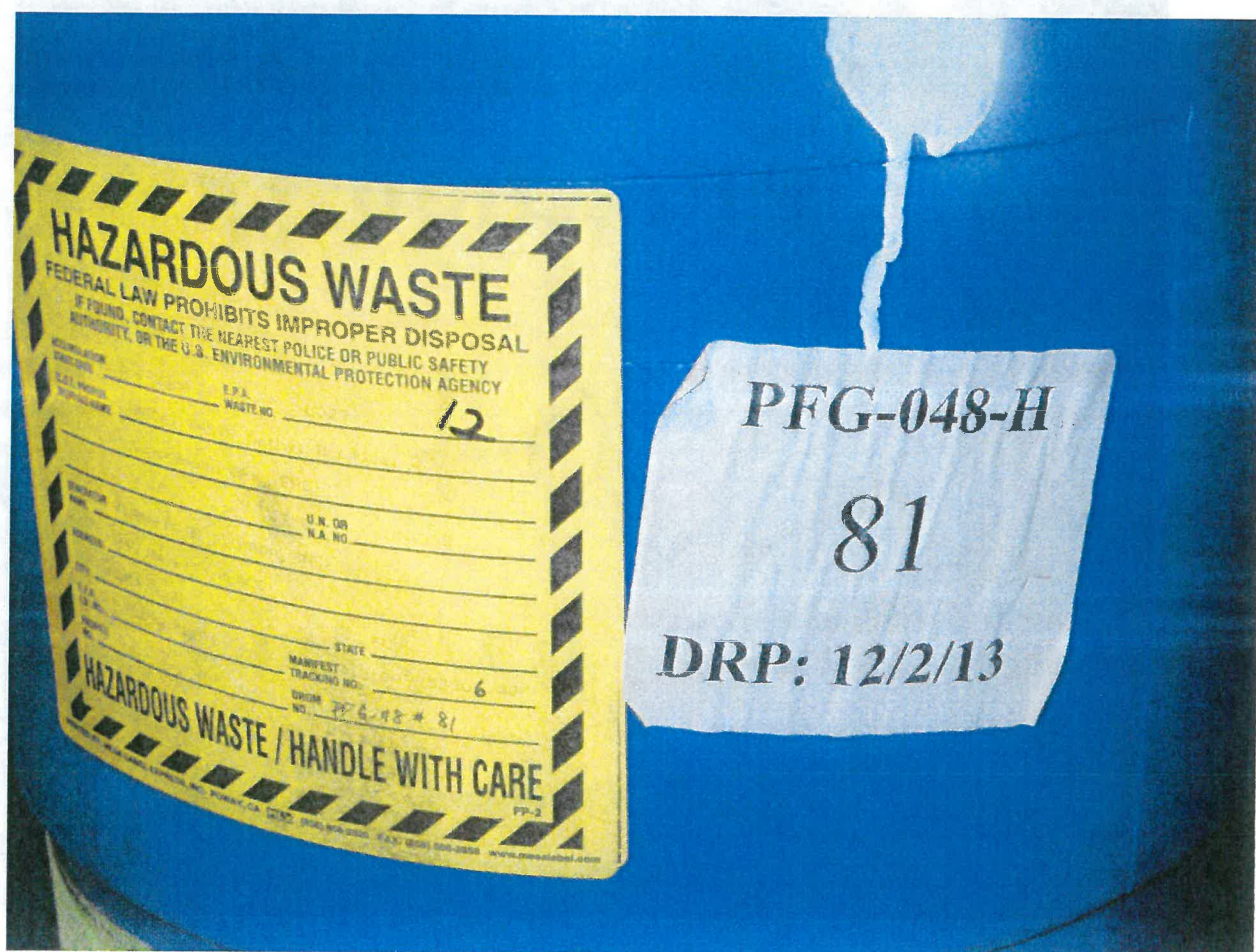


Photo 2 – Container in the LSV Processing and Waste Storage Building

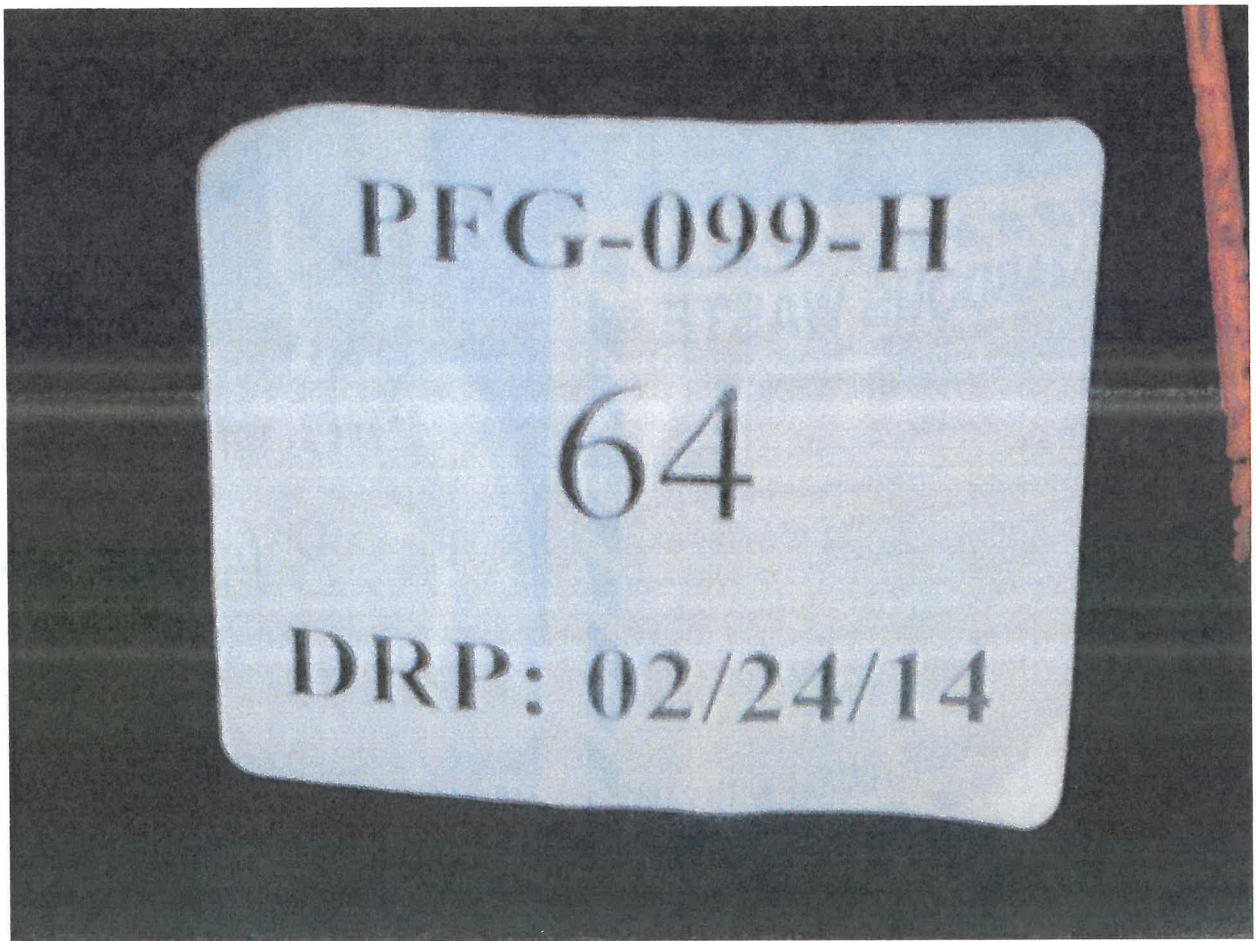


Photo 3 – Container in the LSV Processing and Waste Storage Building



Photo 4 – Container in the LSV Processing and Waste Storage Building



Photo 5 – Process Storage Building



Photo 6 – Process Storage Building

Perma-Fix of Florida, Inc.

IND: 0434

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

ACCUMULATION START DATE	EPA WASTE NO.	D001 D035 F003 F005
D.O.T. PROPER SHIPPING NAME	UN1263 WASTE PAINT RELATED MATERIAL	
3, PGII ERG128		
U.N. OR H.A. NO.		UN1263
GENERATOR NAME	PERMAFIX OF FLORIDA, INC.	
ADDRESS	1940 NW 67TH PLACE	
CITY	SAINESVILLE	STATE FL
EPA I.D. NO.	FL0980711071	MANIFEST TRACKING NO.
PROFILE NO.	PF-WASPAINT	DRUM NO. 46

HAZARDOUS WASTE / HANDLE WITH CARE
FP-2

Photo 7 – Container in the Process Storage Building



Photo 8 – Aisle Space in Process Storage Building



Photo 9 – Aisle Space in Process Storage Building



Photo 10 – Storage Area in Treatment and Operations Building



Photo 11 – Storage Area in Treatment and Operations Building

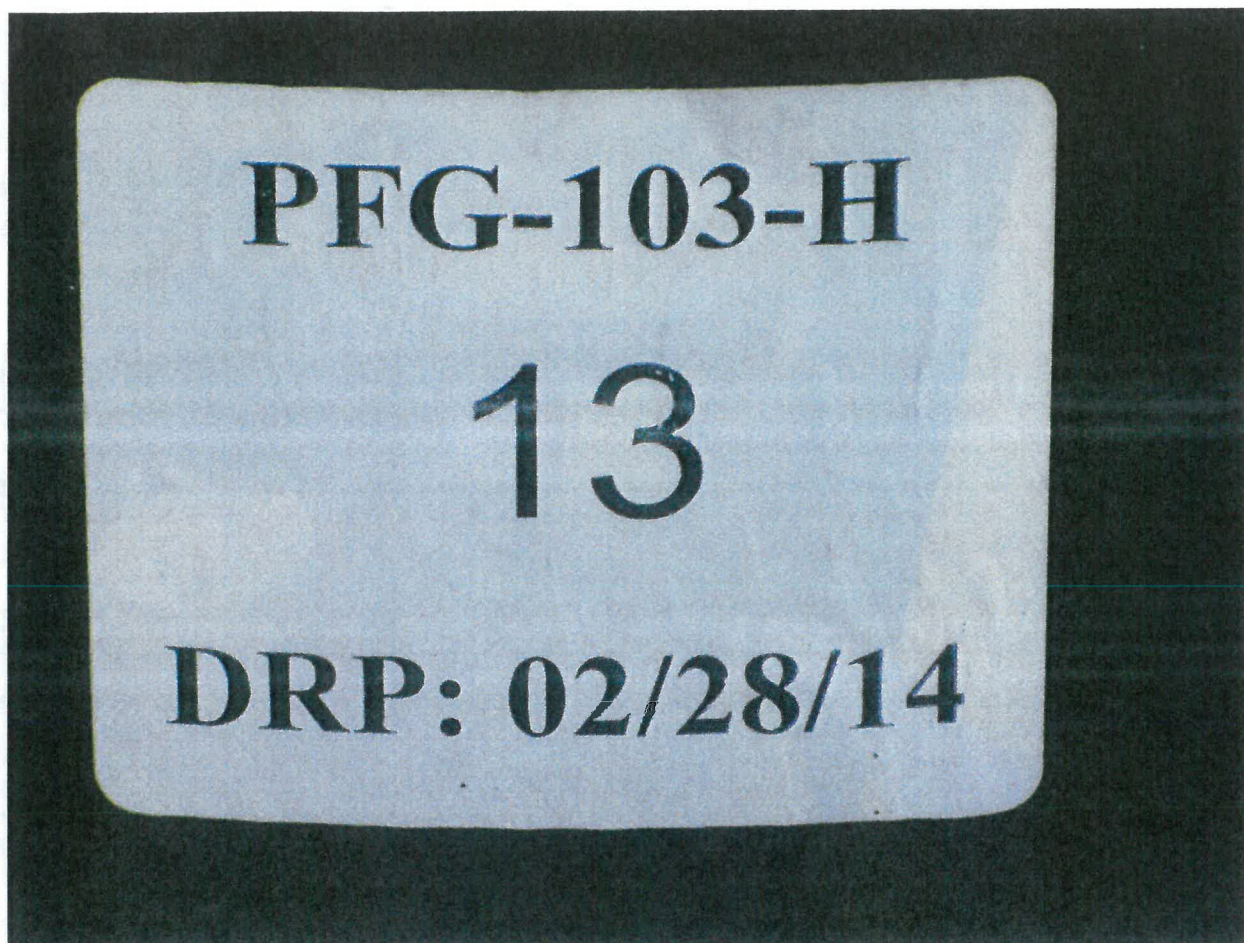


Photo 12 – Container in the Treatment and Operations Building



Photo 13 – Container in the Treatment and Operations Building

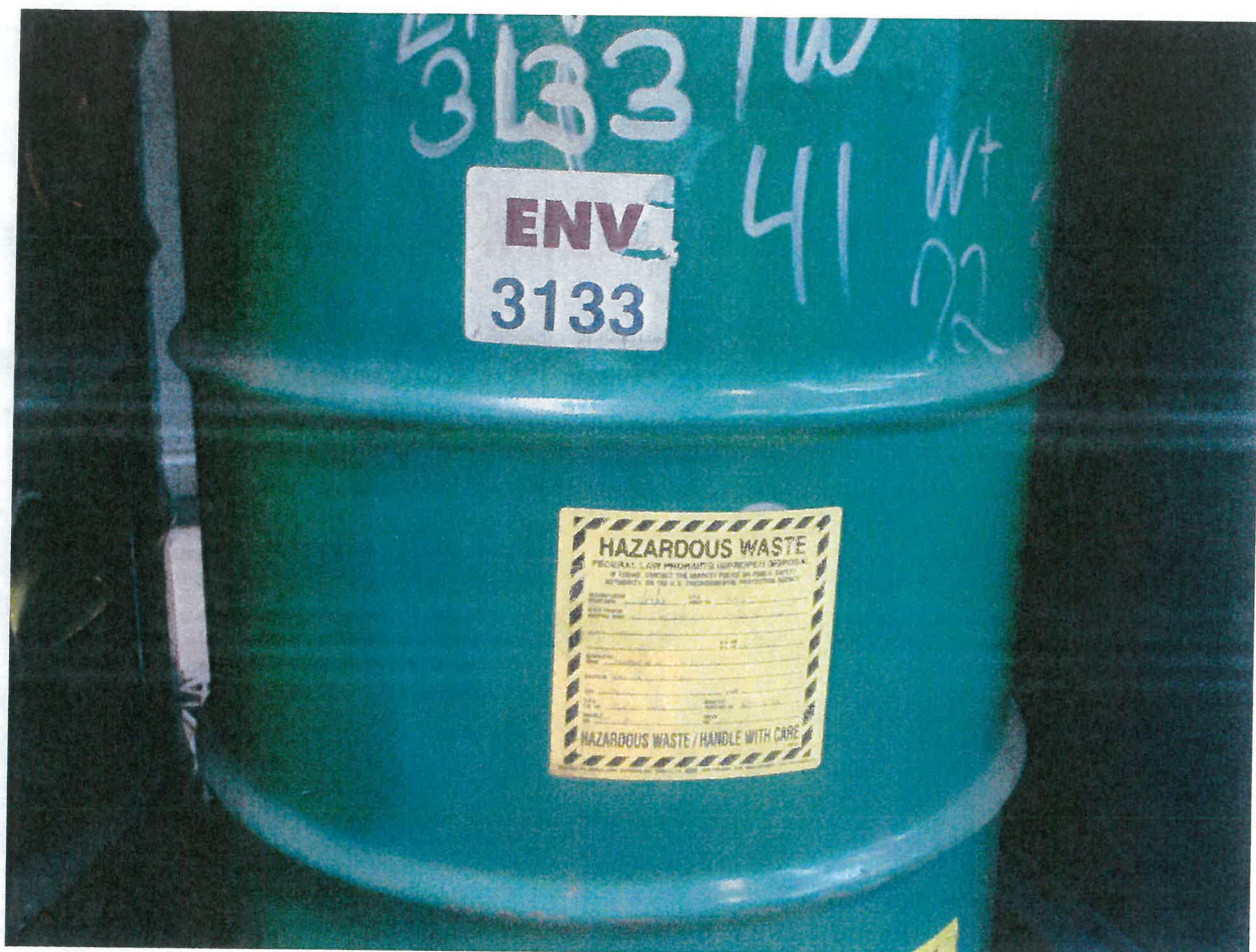


Photo 14 – Container in the Treatment and Operations Building

