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

RECEIVED
ENVIRONMENTAL PROTECTION
APR 27 2016
PERMITTING & COMPLIANCE
ASSISTANCE PROGRAM

APR 11 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: RCRA Compliance Evaluation Inspection
Veolia ES Technical Solutions LLC
EPA ID# FLD 0000207449

Dear Mr. Bahr:

On December 17, 2015, the U.S. Environmental Protection Agency and FDEP conducted a compliance evaluation inspection (CEI) at the Veolia ES Technical Solution facility (Veolia) in Tallahassee, Florida.

This was an EPA lead inspection to determine the facility's compliance status with applicable Resource Conservation and Recovery Act (RCRA) regulations. Enclosed is the EPA RCRA CEI report, which indicates that Veolia was determined to be a Significant Non-complier (SNC) based on the findings of the inspection.

If you have any questions concerning the inspection report, please contact Raj Aiyar, of my staff, at (404) 562-8993, or aiyar.raj@epa.gov.

Sincerely,

for

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

Enclosure

cc: Aaron Mitchell, FDEP

RCRA Inspection Report

1) Inspector and Author of the Report

Raj Aiyar
Environmental Engineer
aiyar.raj@epa.gov
(404) 562-8993

Hazardous Waste Enforcement and Compliance Section
US EPA Region 4 AFC – 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Veolia ES Technical Solution LLC
4972 Woodville Hwy (South Lot)
Tallahassee, Florida 32305-0903
EPA ID No.: FLD 000124917
Tel. No.: (850) 877-8299

3) Responsible Official

Randy Williams, Operations Supervisor
Matthew Melott, Operations Manager

4) Inspection Participants

Randy Williams	Veolia ES
Matthew Melott	Veolia ES
Aaron Mitchell	FDEP
Glen Perrigan	FDEP
Jill Scarborough	FDEP
Heather Perkins	FDEP
Raj Aiyar	US EPA Region 4

5) Date of Inspection

December 17, 2015, 8:45 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

7) Purpose of Inspection

The purpose of this inspection at the Veolia Transfer Yard (here after Veolia) was to conduct an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) to determine the facility's compliance with the applicable regulations.

8) Facility Description

Veolia operates a universal waste transfer facility at 4972 Woodville Highway, Tallahassee, for the parking of transport vehicles prior to and after unloading at the permitted facility. The transfer yard and permitted facility are located on non-contiguous property in the same industrial park. Veolia notified the Department of universal waste transfer facility activities at the transfer yard on January 9, 2006.

9) Previous Inspection History

On June 2, 2015, FDEP conducted a CEI at the Veolia facility. No violations were identified during the inspection.

10) Findings

The inspection team met the representative of the facility at 8:45 a.m. The inspectors performed a walk-through inspection of the transfer facility. Mr. Matthew Melott accompanied the inspectors during the walk-through inspection.

Process Description

The Veolia Transfer Yard (Veolia) is used for the storage of facility transport trailers and is a registered Universal Waste Transfer Area (Picture -1). Fourteen trailers were randomly inspected to ensure compliance with state and federal regulations. Trailers 800401, 817421, and 622828 were empty. Trailers 484466, 889890, 889222, and 694756 contained inbound Universal Waste. The inbound materials comprised of various batteries (NiCad, Li etc.), universal waste lamps (HIDs and Fluorescent), mercury containing devices, and other universal wastes permitted to be processed at the facility (Picture-2). All the containers were labeled, dated, and matched the transport documentation used by Veolia Trailers 683536, 622832, 889985, 8000398, and 818134 contained outbound Universal Waste, post retort materials, (aluminum end caps and post-retort phosphor powder) and electronic waste (Picture-3). The Outbound universal waste shipments are sent to sister Veolia processing sites in Port Washington, Wisconsin and Phoenix, Arizona. All Outbound shipments were properly closed labeled and matched the facility shipping documentation. Trailer 8181358 was used for the storage of Georgia Power containers that were sent to the facility for the transport of their Universal Waste. Trailer 818133 was damaged and is being used for the storage of empty drums and containers used by Veolia to ship universal wastes (Picture-4). No deficiencies were observed at the time of the inspection.

11) **Signed**

Raj Aiyar, Inspector — 04/05/2016 Date

12) **Concurrence**

Larry L. Lamberth — 4/6/16 Date
Chief, Hazardous Waste Enforcement and
Compliance Section

ATTACHMENT A
Veolia ES Technical Solutions LLC
Tallahassee, FLORIDA
FL #000124917
DECEMBER 17, 2015

Picture-1 Universal Waste Transfer Area

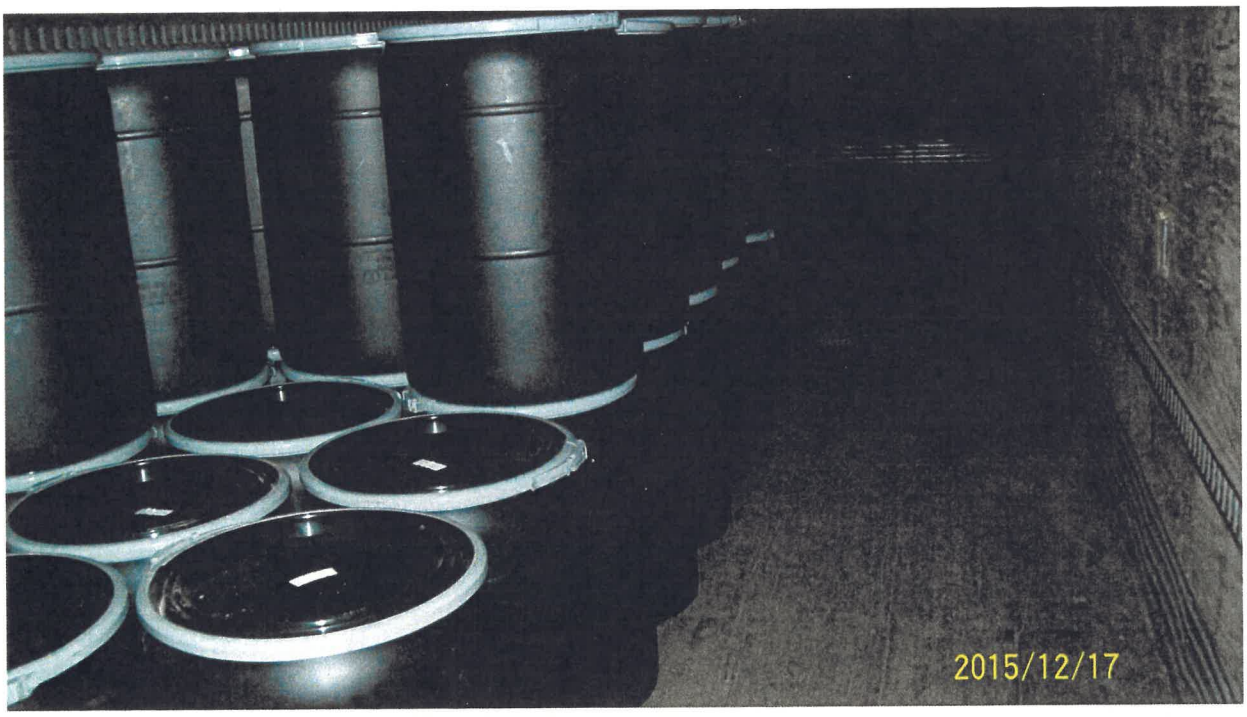




Picture-2 Universal Waste on Trailer



Picture-3 Post Retort Phosphor Powder



Picture-4 Container Storage Trailer

RCRA Inspection Report

1) Inspector and Author of the Report

Raj Aiyar
Environmental Engineer
aiyar.raj@epa.gov
(404) 562-8993

Hazardous Waste Enforcement and Compliance Section
US EPA Region 4 AFC – 10th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Veolia ES Technical Solution LLC
342 Marpan Lane
Tallahassee, Florida 32305-0904
EPA ID No.: FLD 0000207449
Tel. No.: (850) 877-8299

3) Responsible Official

Randy Williams, Operations Supervisor
Matthew Melott, Operations Manager

4) Inspection Participants

Randy Williams	Veolia ES
Matthew Melott	Veolia ES
Aaron Mitchell	FDEP
Glen Perrigan	FDEP
Jill Scarborough	FDEP
Heather Perkins	FDEP
Raj Aiyar	US EPA Region 4

5) Date of Inspection

December 17, 2015, 8:45 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

7) Purpose of Inspection

The purpose of this inspection at the Veolia ES Technical Solutions LLC (here after Veolia) was to conduct an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) to determine the facility's compliance with the applicable regulations.

8) Facility Description

The Veolia facility is located at 342 Marpan Lane, Tallahassee, Florida. Veolia formerly known as Recylights, Superior Support Services Inc., Onyx Special Services has been in operation since 1995. Veolia has currently 13 employees in the transport and processing of mercury containing lamps and devices, mercury contaminated debris, electronic waste, batteries, scrap metal and PCB waste.

The active portion of the Tallahassee facility occupies four acres of the 11 acres owned by Veolia at the site. Veolia is registered with the Florida Department of Environmental Protection (FDEP) as a large quantity generator of hazardous waste, a transporter of hazardous waste, and as a RCRA permitted facility. Veolia is also registered with the FDEP as a used oil transporter through June 30, 2016. Veolia operates a universal waste transfer facility at 4972 Woodville Highway, Tallahassee, for the parking of transport vehicles prior to and after unloading at the permitted facility. The transfer yard and the permitted facility are located on non-contiguous property in the same industrial park. The current operating permit for Veolia, 0071455-HO-011, issued on February 3, 2012, addresses operation of a mercury containing lamps and devices storage, mercury recovery and mercury reclamation.

The following areas of the facility were covered during the inspection site visit:

- Loading Dock
- HID Processing
- Maintenance
- Universal Waste Storage
- Retort Prep Area
- Retort Area
- Fluorescent Lamp Processing
- Container Storage Area
- South Building (Battery, E-waste Storage)

9) **Previous Inspection History**

On June 2, 2015, FDEP conducted a CEI at the Veolia facility. No violations were identified during the inspection.

10) **Findings**

The inspection team met the representatives of the facility at 8:45 a.m. After presenting our credentials to Mr. Matthew Melott. Operations Manager and Mr. Randy Williams, Operations Supervisor, and explaining the purpose of the inspection; the inspectors requested an explanation of the operations of the facility. The inspectors then performed a walk-through inspection of the facility. Mr. Randy Williams and Mr. Matthew Melott accompanied the inspectors during the walk-through inspection.

Process Description

Veolia is designed to recycle mercury containing lamps, devices and materials. Veolia uses the term mercury-containing manufactured articles (MCMA) to refer to mercury containing devices and mercury contaminated materials.

Fluorescent lamps are recycled using a combination of manual and automated dry separation processes to separate the primary components of the lamps; glass, aluminum and the phosphor powder. Glass and aluminum are shipped off-site for further reuse. The phosphor powder derived from the fluorescent lamps is accumulated on-site and the mercury-contained in the powder is reclaimed using a retort oven. In the recovery process, small amounts of other scrap metals and plastics are also generated.

High Intensity Discharge (HID) lamps are processed using a combination of manual and automated separation processes to separate the outer lamp glass, brass or aluminum bases and the mercury-containing arc tube. The arc tubes are crushed and loaded into containers for retort processing to reclaim the mercury.

Loading Dock

The loading and unloading area consists of two trailer docking areas for forklift transfer of materials from transport vehicles. Dock 1 is used to unload HID lamps, whereas Dock 2 is used to unload four and eight foot fluorescent lamps. At the time of the inspection, HID lamps were in the process of being unloaded at the loading dock. All the containers were properly labeled and the closed. Post-retort phosphor powder in 55-gallon drums is accumulated in this area along the east wall prior to off-site shipment for disposal in a Subtitle D landfill. The permit requires that post-retort phosphor powder be sampled to ensure effective retort processing prior to off-site shipment. The inspectors observed eight drums of post-retort phosphor powder and Non-PCB ballasts stored along with 21 55-gallon drums of in-process pre-retort phosphor powder.

During the inspection, a small business delivered universal waste lamps to Veolia for recycling purposes. In order to promote recycling of fluorescent lamps, Veolia accepts lamps from small businesses as long as the deliveries are small volume universal waste and packaged properly.

Veolia did accept the shipment from the small business however; some of the lamps were damaged during the unloading operation at the loading dock. The facility immediately addressed the spill by using their contingency plan and emergency procedures. The broken glass debris was promptly cleaned, collected in a storage container and moved to the process area. The inspectors recommended Veolia ensure that only secured and properly containerized shipments were taken for processing and to review the workers training in order to maintain and operate the facility such that release of hazardous waste constituents that could threaten human health or the environment is minimized.

Pursuant to Fla. Admin. Code Ann. r. 62-737.400(5) [40 C.F.R. § 273.33(d)], this regulations requires a large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Veolia failed to manage their lamps in the loading dock properly and as a result had a spill of hazardous waste.

HID Processing (Manual)

HID lamps are processed manually or by an automated HID machine in the southern end of the building. The HID lamps that cannot be processed by the automated HID process are manually separated to separate the various components of the lamps. The ceramic or metal base of the lamp is separated and placed into a container for recycling. The HID arc tubes are further processed by placing the tube into a crusher which breaks the arc tube and size it for placement in the retort oven. The crushed arc tubes are collected into 55-gallon drums and are staged for processing in the Retort Prep Area.

HID processing (Automated)

Veolia uses a custom built HID lamp machine to process various types of HID lamps. The HID lamp process is a dry separation process that uses mechanical equipment to separate the components of the HID lamps. The HID lamps with rigid ceramic bases cannot be processed in the HID lamp machine and so they are manually processed. The HID system comprises of conveyor belts, crushers, magnets and air pollution control equipment to control fugitive mercury emissions. The lamps are initially fed into a primary conveyor belt where the outer glass is broken and separated from the lamp. The outer glass is collected in a collection drum for recycling. The remaining components of the lamps are dropped into a roller crusher, which breaks the arc tube separating it from the base, and metal wire, which holds the arc tube in place. The arc tubes are discharged from the crusher and collected into 55-gallon drums. These are later staged for processing in the Retort Prep Area.

The entire process is enclosed and under negative pressure. The air pollution control equipment includes a bag tower that filters out particulate matter and glass fines. The exhaust from the bag tower is then directed through a HEPA filter system to capture any particulates, which may pass through the bag tower.

Once the air exits the HEPA filter, any residual mercury vapor is collected by a series of carbon canisters that are connected to the HEPA filter system. The exhaust from the carbon filter is then discharged through a stack.

The arc tubes mixed with mercury are crushed and dropped into 55-gallon drums for further processing in the retort room.

Maintenance Area

The facility maintenance area is located adjacent to the HID processing area. The maintenance area is enclosed by a cage that keeps all maintenance materials separated from processing equipment. Veolia has a shop-vacuum that is used to clean up the dust and floor sweepings in the shop floor.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste must determine if that waste is a hazardous or not. Veolia failed to make a proper waste determination of the shop-vacuum to ensure proper management and disposal.

Mr. Melott mentioned the possibility of moving the maintenance area to the South Building in order to allow for more storage of the universal wastes. The inspectors reminded Mr. Melott that any changes made in the facility's process area should be addressed in the permit application at the time of permit renewal.

Universal Waste Storage

The Universal Waste Storage Area, commonly referred to as lamp storage area, is located in the southern portion of the building. This area is divided into two separate storage areas divided by a center aisle large enough to allow for the movement of a forklift within this area. The storage area along the west wall has a capacity for the storage of 34 pallet spaces. The storage area along the east side has a capacity for the storage of 24 pallet spaces. This area is used for temporary storage of universal waste lamps that cannot be immediately transferred to the staging area for processing. These lamps normally consist of HID lamps, U-tube lamps and other specialty lamps that require manual processing before they can be placed into recycling equipment. The area is also used for temporary storage of universal waste batteries and non-RCRA hazardous materials.

During the inspection there were several boxes that were not properly closed (Rows 6, 7 and 10). Rows 10 and 11 also had issues with aisle spacing (Picture-1, 2). Palletized materials were beyond the permitted lines and some were leaning into the aisle area.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 264.173], a container holding a hazardous waste must always be closed during the storage, except when it is necessary to add or remove the waste. Veolia failed to close boxes containing universal waste lamps stored in the storage area.

Veolia's Operating Permit 0071455-HO-011 dated February 3, 2012, requires that the permittee shall maintain aisle space as required by 40 C.F.R. § 264.35 which requires owner or operator to maintain aisle space to allow unobstructed movement of personnel, fire protection equipment and decontamination equipment to any area of the facility operation in an emergency. Veolia failed to maintain aisle space as required in their

operating permit.

Veolia's Operating Permit 0071455-HO-011, Part II –Operating Conditions 2 and 3 require that the facility personnel must successfully complete the approved training program indicated in the training plan in attachment 7 of the permit application within six months of employment or assignment to a facility or to a new position at the facility. Veolia failed to provide proper training to the facility personnel in managing the universal waste storage area which included maintain proper aisle space and ensuring that all the universal waste storage containers were closed.

Adjacent to the universal waste storage area is a Satellite Accumulation Area (SAA) for an aerosol can puncture (Picture-3). The new SAA was not a part of the facility permit and had recently been implemented by the new Operations Manager. Inspectors informed Mr. Melott that any new changes to the facility process plan should be discussed with the FDEP Permitting staff before being implemented. The FDEP Permitting staff shall determine whether the requested change in the process plan is a minor, moderate, or a major modification and approve accordingly.

Retort Prep Area

The prep area is separated from the retort oven by a roll-up door. The phosphor powder, crushed HID arc tubes, and MCMA's are prepared for the retort oven in the prep area. The mercury-containing devices are disassembled using pneumatic or manual equipment in the prep area. The clean metal, glass, plastics are removed from intact devices and segregated for recycling or disposal, the elemental mercury is collected in a container. The remaining components are consolidated into a drum for processing in the retort oven. No deficiencies were observed during inspection in this area.

Retort

The retort operation is comprised of an oven, which is used to heat the mercury containing waste that releases the mercury vapors, which are drawn off the oven with a vacuum pump and are pulled through a series of heat exchangers in order to condense the vapors back into a liquid mercury state. The liquid mercury is decanted from the collection point and accumulated in a container. This process varies depending on the materials that are going through the retort process. No deficiencies were observed during inspection in this area.

Fluorescent Lamp Processing

The fluorescent lamp processing area is located in the northwest corner of the facility. The fluorescent lamps are recycled using a combination of manual and automated dry separation processes to separate the primary component of the lamps, glass, aluminum, and phosphor powder.

The fluorescent lamp recycling system is designed to process fluorescent lamps including straight lamps, circular lamps, u-tube lamps, compact lamps and UV lamps with a daily design capacity of 96,000 lamps (4,000 lamps/hrs. x 24 hrs./day).

The lamps are brought into mercury recycling area on pallets containing lamps within cardboard boxes or lamp fiber drum. Excess plastics, metals in case of circular, U-tube and compact fluorescent lamps are manually removed prior to placement onto the in-feed container. The fluorescent lamps are hand fed into the lamp processing room via a conveyor belt. At the time of the inspection, materials were being staged for processing through the fluorescent lamp processing line #1 and #2 (Picture-4). According to Veolia, the second processing line is used only when there is a need to process a larger volume of materials. The inspectors noted 4 55-gallon containers containing inner arc tubes waiting to be processed.

Lamps are crushed with a sizing crusher and dry-separated into glass, aluminum and phosphor powder. The mercury bearing phosphor powder is collected by a bag tower and accumulated in a 55-gallon drum. The recovered glass is transferred to a roll-off container for transport off-site for recycling purpose. The aluminum end caps are collected in hopper for recycling.

During the last compliance inspection, the facility had purchased a new 22.5-foot auger for the second processing line however, it had not been installed. During this inspection, the inspectors were informed that the new auger had been installed since the previous inspection and that both the processing lines were in operation currently. No deficiencies were observed during inspection in this area.

Container Storage Areas

Veolia has two storage areas designated as "Container Storage Area (CSA) #1 and CSA #2. The CSA #1 is located within the northeast corner of the facility. The CSA #2 is located within the northern portion of the warehouse adjacent to the east wall of the lamp processing room. The CSAs are permitted for up to 7,424 cubic feet of mercury containing lamps including fluorescent lamps, HID lamps and other universal wastes such as batteries or non-RCRA hazardous material. The storage allows up to 27 pallets (108 55-gallon containers) of MCMA, mercury containing phosphor powder, HID arc tubes, prep room debris and PPE, spent carbon and dental amalgam and traps.

At the time of this inspection, in CSA #1, the inspectors observed four lab packs with a removal from service date of 10/20/2015; 44-containers of pre-retort materials, four Gaylord boxes of post retort aluminum end caps, seven 5-gallon containers labeled as dental amalgam and a 55 gallon container of nonhazardous PPE (Picture-5). The CSA #2 comprised of 13 55-gallon containers of nonhazardous post retort powder and aluminum end caps, one container of mop water, a Gaylord box of crushed aluminum end caps and several pallets of preprocessed mercury containing articles (Dental amalgam, traps, and mercury containing materials) (Picture-6). The oldest date noted was October 20, 2015. The inspectors noted that facility had several pallets outside the designated permitted area. All containers were properly closed, labeled, and dated. Veolia failed to maintain aisle space as required in their operating permit.

Veolia's Operating Permit 0071455-HO-011 dated February 3, 2012, requires that the permittee shall maintain aisle space as required by 40 C.F.R. § 264.35 which requires owner or operator to maintain aisle space to allow unobstructed movement of personnel, fire protection equipment and decontamination equipment to any area of the facility operation in an emergency.

Outside North Storage Area

Four 20 yard roll-offs for collection of processed glass are staged in this area on a concrete pad. An adjacent asphalt paved area is used for collection of paper-products, wood pallet recycling and various empty container storage (Picture-7).

The hazardous waste transfer area is also located here for overnight holding of transport trucks in the event of an arrival after business hours. The trucks are immediately unloaded during the next business day. No deficiencies were observed during inspection in this area.

South Building Battery, Container and E-Waste Storage

This building is immediately south of the main building and is divided into two large storage areas. The Container storage area is used to hold empty fiber drums and cardboard boxes. No universal or hazardous wastes are stored in this area. The second room in this building is used for storage of e-waste and battery storage (Picture-8). The space is permitted to store up to 72 pallets. At the time of the inspection, all pallets were properly labeled and protected from the environment. A new battery sorting table has been added to help in sorting of the various battery types received by the facility. No deficiencies were observed at the time of the inspection.

Records

Veolia maintains records including: Inbound/outbound HW manifests or shipping documentation, Monthly Hg Reclamation Rate Samples, Weekly HW Storage Inspections, Weekly Process Operation Inspections, Personnel Training Records, Weekly Composite Samples, Weekly Safety Inspections, and the Contingency Plan. The records were randomly reviewed for CY2014 and CY2015. The inspectors noted that some of the outgoing manifests where without a final signed copy (Manifest 000666944 VES-8/17/2015). Veolia was able to acquire the signed copies of the manifests before the end of the inspection. However, the inspectors noted that the signed manifest 000666944 VES was not received until 10/01/2015 to the generator.

Veolia's Operating Permit 0071455-HO-011 dated February 3, 2012, requires that the permittee shall comply with shipping paper requirements specified in subsection 62-737.800 (110, F.A.C and 40 C.F.R. § 262. Veolia did not have the final signed copy of the uniform hazardous waste manifest for Manifest # 000666944 VES-08-17-2015. The waste manifest was not acquired within the 30 days' time limit.

The records review process was followed by an exit interview. The findings of the inspection were discussed and the inspection was concluded.

11) Signed

Raj Aiyar, Inspector — Date: 04/05/2016

12) Concurrence

Larry L. Lamberth
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch — Date: 4/6/16

ATTACHMENT A
VEOLIA ES TECHNICAL SOLUTIONS
TALLAHASSEE, FLORIDA
FLD # 0000207449
DECEMBER 17, 2015



Picture-1 Universal Waste Storage (inadequate aisle space)

Picture-2 Universal Waste Storage (open waste lamps boxes)





Picture-3 Aerosol Can Area (SAA)



Picture-4 Fluorescent Lamp Processing



Picture-5 Container Storage Area 1 (Containers outside the permitted areas)



Picture-6 Container Storage Area 2



Picture-7 North Outside Storage



Picture-8 South Building (Batteries, Containers and E-Waste Storage)