



# THE ENVIRONMENTAL QUALITY COMPANY

EQ FLORIDA, INC. • 7202 E. 8<sup>TH</sup> AVENUE • TAMPA, FLORIDA 33619 • TEL 800-624-5302 • FAX 813-628-0842

## SENT OVERNIGHT VIA FEDERAL EXPRESS

November 4, 2010

Mr. Merlin D. Russell Jr.  
Professional Geologist  
Florida Department of Environmental Protection  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: EQ Florida Inc.; FLD 981 932 494; Operating Permit Renewal  
Application 34875-HO-009  
Hillsborough County  
First Notice of Deficiencies

Dept. Of Environmental Protection  
NOV 05 2010  
Southwest District

Dear Mr. Russell:

In response to your letter dated September 22, 2010, I have attached the requested information. The response is in the form of an enclosure briefly detailing the changes that were made, a strikethrough/underline copy which indicates any deletions or additions that were made, and a clean copy of replacement pages for insertion into the binders that were originally submitted.

Thank you for your assistance during this process and please let me know if there is anything else I can provide.

Sincerely,

Stuart Stapleton  
EHS Manager

Enclosure  
Cc with enclosure:  
Jim Dregne, DEP Tampa

**ENCLOSURE**  
**The Environmental Quality Company FLD 981932494**  
**Operating Permit Renewal dated July 22, 2010**  
**7202 E. 8<sup>th</sup> Avenue, Tampa, Florida 33619**

**General Comments:**

1. It is EQ Florida's understanding that the loading and unloading areas and the trucks that are backed up to the warehouse are in fact part of the facility's permitted storage area. Further discussion concerning this matter is desired.

**Specific Comments:**

2. Part I.A.1: Noted.
3. Part I.A.10: Noted.
4. Part I.A.11: Noted
5. Part I.A.19: Noted
6. Part I.B.1: The latitude and longitude of the facility was adjusted slightly using Google Earth as the method and datum.
7. Part I.B.2: The area of the facility has been changed from 1.4 acres to 4.46 acres here and throughout the application including Section 2 pages 3 and 7, Section 7 page 3, and Section 8 page 3.
8. Part P: Additional information has been included as Part Q. Information Requirements for Solid Waste Management Units
9. Section 2-Page 3: The permit number, and issue and expiration dates were removed.
10. Section 2-Page 4: Figure 5.12A reference removed. Also removed from Section 2-Page 5.
11. Section 3-Page 9: All other federal laws that may apply have been referenced.
12. Section 4-Pages 18-19: The "Quality Control Policy" has been revised. Pages 20 and 21 are also included due to reformatting.
13. Section 5-Page 5: The Facility Inspection Log now includes the Filter Press. The trucks that are temporarily storing hazardous waste in containers are included in the inspection as part of the vehicle Unloading Area inspection.

14. Section 6, Pages 6-7: Additional training has been included.
15. Section 8:
  - a. Page 6 has been updated to indicate that the emergency response coordinators are available at all times.
  - b. Page 8 has been updated to include the equipment description, location and capabilities.
  - c. Page 29: The requested information is found on Page 28.
  - d. Page 4: A description of the equipment used at the facility to mitigate power outages has been included.
  - e. Page 4: A description of the procedure used at the facility to prevent releases to the environment has been included.
16. Section 8-Page 33: John Griffin has been replaced with Merlin D. Russell Jr.
17. Section 9-Page 3: Manifest language has been deleted.
18. Section 10 (Solid Waste Management Units): Updated to include additional SWMUs. Page 9 was also included due to reformatting.
19. Section 10-Page 4: Language concerning the removal of the filter press as a treatment process has been removed.
20. Section 11-Page 6: Partial closure language has been removed.
21. Section 11-Page 13: Additional soil samples will be taken under buildings or in sumps if there are visible cracks or indications that contamination could have migrated into the soils and/or groundwater. Page 14 is also included due to reformatting.
22. Section 11-Page 22: Language has been included indicating a meeting will be conducted with the Department prior to the implementation of the closure plan.
23. Section 11-Page 23: Please forward comments concerning closure cost estimates when the evaluation is complete.
24. Incoming and Outbound vehicles are situated over a temporary manmade surface having emergency liquid containment or at one of the unloading areas when the vehicle contains hazardous waste.
25. Incoming and Outbound vehicles are situated over a temporary manmade surface having emergency liquid containment or at one of the unloading areas when the vehicle contains hazardous waste.

26. Section 14-Page 8: Language concerning the management of Universal Waste Lamps and Batteries has been included. Figure 5.13 has been revised to indicate the Universal Waste Lamps storage location.
27. Section 14-Page 10: Containers will be rinsed with an appropriate solvent.
28. Section 14-Page 10: DEP SOP 5000 (Waste Sampling) and/or other "Procedures and guidelines" has been included.
29. Section 15:
  - a. The filter press will not be used off-site at a generators site and the text has been removed. Information of the potential pathways of human exposure or environmental receptors is discussed in Section 15-Page 6.
  - b. The inspection procedure is discussed in Section 15-Pages 3 and 4. The filter press has also been added to the revised daily inspection form (see Comment # 13 above).
  - c. A copy of the closure cost estimate is included in the provided closure cost worksheets, specifically worksheet DC-4.
30. Section 16-Page 10: Removed LDR reference.
31. Section 16-Page 5: Operational procedures for monitoring and maintaining the carbon filter units have been included.
32. Section 16-Page 8: The building does not offer any beneficial vapor control and the sentence has been revised.
33. Section 16-Page 11: Instrument identification has been included. The equipment used to transfer hazardous waste is still used less than 300 hours per calendar year. The noted exemption has been revised.
34. Section 16-Page 11: Vehicle identifications updated.
35. Attachment 2-Page 2: Redundant and removed.
36. Attachment 5:
  - a. Figure 5.1 has been revised and includes a scale on the map.
  - b. Noted.
  - c. Figure 5.6 has been revised and USL-City Environmental Services reference has been removed.
  - d. Figure 5.10 has been revised and includes a scale and north arrow.
  - e. Figure 5.14 has been updated to include all SWMUs.

Attachment 14:

- f. Spelling corrected.
- g. Corrected.
- h. Deleted table in Section 10-Page 8.

Other revisions include the following

1. Section 14-Page 4: Reference to Attachment 5.12A has been revised to Attachment 5.12.
2. Section 14 page 5-7 & 9-16: Included due to formatting.
3. Section 15: Closure Cost Worksheet DC-4 included for demonstration purposes only.
4. Attachment 2: The whole attachment was revised to correct the revision date.
5. Attachment 5: Cover Page: Figure 5.12A has been removed.
6. Attachment 14: Revised to include additional Solid Waste Management Units.

**STRIKETHROUGH  
COPY**

## 2. GENERAL INFORMATION

### INTRODUCTION

#### General Information

This submittal is for the renewal of the existing Hazardous Waste Operating Permit for the EQ Florida, Inc. (EQFL), formerly known as US Liquids Inc., hazardous waste container storage and treatment facility. EQFL is a division of EQ Holding Company, a Michigan Corporation.

ID No.: FLD 981 932 494  
Permit No.: ~~H029-263213~~  
County: Hillsborough  
Issue Date: ~~June 22, 2004~~  
Expiration Date: ~~January 22, 2006~~  
Address: EQ Florida Inc.  
2002 North Orient Road  
Tampa, Florida 33619  
(813) 623-5302

There are no significant physical changes to the facility from the original permit to this renewal. The facility remains a 4.46 4.4 acre more or less, (MOL) site consisting of an office building with small laboratory; a 5,866 square foot (MOL) totally enclosed building utilized for the container storage and treatment of hazardous waste, and a vehicle loading/unloading area.

The facility operations remain essentially unchanged from the original permit. The operations remain container storage and treatment. There are no immediate plans for utilizing the press for treatment but the press may be utilized for treatment prior to the expiration of this permit should business, environmental regulations, or economics justify the treatment. The facility has operated as a container storage facility. Some re-packaging and blending of similar waste streams is performed at the facility. There is no on-site disposal.

The facility General Information, Inspection Plan, Contingency Plan, Procedures, Training Program, Waste Analysis Plan, Container Management, Closure Plan, and other information have been updated and revised to reflect regulatory changes and more detailed and accurate conditions.

Non-RCRA regulated waste information does not apply to this permit and is for informational purposes only. These items are regulated under Subtitle D regulations, and RCRA Subtitle C regulations do not apply (by definition). The EQFL solid waste management facility is similar to transfer facilities of other solid waste facilities except it happens to be located at a permitted hazardous waste facility. EQFL is also a registered hazardous waste transporter with a state registered (on site) transfer facility. EQFL far exceeds the minimum regulatory requirements often typical of solid waste and transporter facilities. Examples of this include HSWA SWMU requirements, voluntary groundwater monitoring, on-site trained personnel and equipment to handle virtually any emergency, and more. Management of non-RCRA regulated waste does not interfere with management of RCRA regulated hazardous waste.

The EQFL facility had no solid waste activities prior to the existing permit. A Solid Waste Management Unit (SWMU) RCRA Facility Assessment (RFA) of the EQFL facility was initiated on February 15, 1993. There have been no releases to the environment of hazardous waste or hazardous waste constituents for any EQFL SWMU.

The EQFL facility hazardous waste capacity is 50,000 gallons; a maximum of 20,000 gallons in Bays 1 and 3, and a maximum of 10,000 gallons in Bay 2. The capacity is consistent with the physical limitations of the facility and is used throughout this application to determine containment, closure cost, financial assurances, and aisle space requirements. Actual day to day volume is usually less than 25,000 gallons. EQFL will utilize the container arrangement shown on Figure 5.12A. The containers will normally be stored in a "single-stacked" arrangement. "Single-stacked" indicates that no forklift is necessary to load, unload, or move any container. Although the storage is referred to as "single stacked," small containers (such as 5-gallon pails) and aerosol 55 gallon drums will

be manually stacked on top of the "single stacked" containers.

EQFL will occasionally utilize a double-stack container arrangement. The same storage arrangement (Figure 5.12A) shown for single-stacking will be utilized for double-stacking with the exception that adjacent storage rows will not be utilized for container storage so that each row of double-stacked containers has access to an eight-foot aisle (if needed). The eight-foot aisle will allow turning radius access for a forklift to stack and unstack containers. Forklifts will not be utilized in the ignitable/reactive bay (Bay 2) unless they are Class I rated, explosion proof, or equivalent.

The sectioning between single and double stacked storage utilization will be by a containment sump basis. Specifically, the stacking requirements will apply to all containers utilizing the same containment sump. This would make it permissible to have the containers in Bay 1A double stacked and the containers in Bay 1B single stacked since Bay 1A utilizes different containment sumps from Bay 1B. If any containers are double stacked (other than small containers manually stacked on top of single-stacked containers) in the area contained by a common containment sump, then all containers in that area would have to meet the double stacked requirements. Small containers may be manually stacked on top of single stacked containers.

Waste management operations are described in detail to provide information that is current and accurate to actual conditions and practices. The facility remains essentially a transfer facility with container storage and no on-site disposal.

This permit renewal includes a section addressing air-permitting requirements. Calculations using conservative "worst case" data show the EQFL facility is far below applicable air permitting requirements.

### **Facility Layout and Operations**

The EQFL facility is a permitted hazardous waste storage and treatment facility. No on-site disposal occurs at the EQFL facility. EQFL manages non-RCRA regulated waste, household hazardous waste, used oil and filters, mercury containing lamps and devices, TSCA exempt and limited quantity exempt PCB and asbestos wastes, recyclable materials, and other similar substances, materials, and wastes. The primary waste management operations are storage and transfer.

The facility consists of the 4.46 ~~1.4~~-acre (MOL) site ~~and adjacent (contiguous) property of 3.06-acre (MOL)~~. The permitted facility is located on the site is a 5,866 square foot (MOL) building, which was specifically designed for hazardous waste management. The container storage building is composed of three separate bays. The bays are separated by an eight-inch wide concrete block wall and fire doors. The wall extends from the floor to the roof and has been designed with a minimum fire resistance of four hours.

The total hazardous waste capacity within the building is 50,000 gallons when containers are double-stacked on pallets. The hazardous waste consists of solids, sludges, liquids, and lab packs.

The facility site plan (survey) at a scale of 1 inch to 20 feet is shown in Attachment 8.1. The facility consists of a 1.4-acre (MOL) site. The land was previously undeveloped. No previous solid waste management units (SWMUs) were located on this site. The SWMUs currently identified on site are described in the SWMU section. The surrounding land uses

## **CONSIDERATIONS UNDER FEDERAL LAW**

No other federal environmental laws apply to the EQFL facility.

~~The following list of Federal laws listed in 40 CFR 270.3 do not apply to the City Environmental Services, Inc. of Florida (EQFL) facility:~~

~~The Wild and Scenic Rivers Act~~

~~The National Historic Preservation Act of 1966~~

~~The Endangered Species Act~~

~~The Coastal Zone Management Act~~

~~The Fish and Wildlife Coordination Act~~

~~Executive Orders~~

## Facility Manager's or Designee's Judgement

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

## 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.

## 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 NELAC 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 be NELAC certified. Data produced for use by DEP will use applicable DEP SOPs per the DEP Quality Assurance Rule, 62-160.210, .240, .300 & .320 F.A.C. ~~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.

## **ANALYTICAL PROCEDURES**

### **Mandatory Waste Analyses**

These are analytical procedures designated to identify or screen waste. They have been developed by EQFL based upon its operating experience as rapid but effective means for establishing key decision parameters pertinent to proper waste management.

1. Physical Description. Samples are inspected and the physical appearance of the waste is recorded Physical State (solid, semi-solid, liquid, etc.)
2. pH Screen. Full-range pH paper or a pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.
1. Water Mix Test. 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:

## EQ Florida Inc. – Facility Inspection Log

Date: \_\_\_\_\_

Inspector: \_\_\_\_\_

Time: \_\_\_\_\_

Approved By: \_\_\_\_\_

		<u>SATISFACTORY</u>	<u>UNSATISFACTORY</u>
1.	Containers:		
	1.1 Condition, Closure, and Compatibility	_____	_____
	1.2 No Leaks	_____	_____
	1.3 Proper Labeling	_____	_____
	1.4 Aisle Space & Housekeeping	_____	_____
	1.5 Proper Storage Location	_____	_____
	1.6 Over 1 year Accumulation start date	_____	_____
	Drum Numbers (if applicable);	_____	_____
2.	Vehicle Unloading Area:	_____	_____
3.	Transfer Facility Vehicles and Wastes:	_____	_____
4.	Empty Container Storage:	_____	_____
5.	Stormwater System:		
	5.1 Trenches	_____	_____
	5.2 Sump and Filter System	_____	_____
	5.3 Retention Pond	_____	_____
	5.4 Lock Out Box Installed	_____	_____
6.	Containment Areas and Sumps (cracks, leaks etc.)	_____	_____
7.	Safety Equipment:	_____	_____
	7.1 Fire Extinguisher	_____	_____
	7.2 Telephones & Air Horns	_____	_____
	7.3 Safety Shower & Eye Wash	_____	_____
	7.4 Acid, Caustic, Solvent, and Mercury Spill Kits	_____	_____
	7.5 Emergency Exits (including flammable bay)	_____	_____
	7.6 Safety Supply Lockers	_____	_____
	7.7 Fire Suppression System	_____	_____
	7.8 LEL Meter and Sensors	_____	_____
8.	<u>Miscellaneous Unit</u>		
	8.1 <u>Filter Press</u>	_____	_____
9.	Waste Inventory:	<u>55-Gallon Containers</u>	<u>5-Gallon Containers</u>
	Bay 1 ORM	_____	<u>Total Gallons</u>
	Bay 1 Acids	_____	_____
	Bay 2 Flammables	_____	_____
	Bay 2 Flammable Solids	_____	_____
	Bay 2 Reactives	_____	_____
	Bay 2 Aerosols	_____	_____
	Bay 3 Oxidizers	_____	_____
	Bay 3 Alkalines	_____	_____
	Bay 3 Poisons	_____	_____
	Bay 3 Non-Regs	_____	_____
	Bulk Shipments	_____	_____

TOTAL HAZARDOUS WASTE \_\_\_\_\_ Gallons

10. Additional information for unsatisfactory items: \_\_\_\_\_

11. Remedial actions necessary for unsatisfactory items: \_\_\_\_\_

## **EQFL 24- (or 40-) Hour Training**

### **As Required by 29 CFR 1910.120**

#### **COURSE OUTLINE**

Regulatory Review 29 CFR 1910.120

Toxicology

Principles of Hazardous Materials

Right-To-Know (HAZ-COM)

Personnel Protective Equipment (PPE)

Respiratory Protection

Contingency Plan Implementation

Spill Clean-up Drill

Decontamination

Manifests, Profiles, Labels, & Land Bans

DOT Labeling, Placarding, & Shipping

On-The-Job Training

Site Control/ Site Safety & Health Plan

Emergency Response

Hazardous Waste Operations

Fire fighting Procedures

Emergency First Aid / CPR

## **EQFL 8-Hour Refresher**

### **As Required by 29 CFR 1910.120**

#### **COURSE OUTLINE**

- ☐ Contingency Plan Implementation
- ☐ Mock Chemical Spill Drill
- ☐ SCBA and Air Line
- ☐ Cartridge Respirator
- ☐ Respirator Fit Test
- ☐ PPE (Vendors)
- ☐ Florida Right-To-Know
- ☐ Manifests, Profiles, Labels, & Land Bans
- ☐ DOT Labeling, Placarding, & Shipping
- ☐ On-The-Job Training
- ☐ Safety Meetings
- ☐ Emergency Response
- ☐ Hazardous Waste Operations
- ☐ Fire fighting Procedures
- ☐ Emergency First Aid / CPR

## **7. PREPAREDNESS AND PREVENTION**

### **DESIGN AND OPERATION OF FACILITY**

The EQFL facility was specially designed and built for hazardous waste storage, transfer, and treatment. The facility consists of a 4.6 ~~4.4~~ acre (MOL) site with a loading/unloading area, office building, and 5,866 square foot (MOL) storage building. ~~The facility is adjacent (contiguous property) to an additional 3.06 acre (MOL) that is owned by EQ.~~ The facility Site Plan, storage building, and survey are shown on Attachments 8.1 and 8.2.

The office building does not conduct commercial hazardous waste storage, transfer, or treatment. The EQFL quality control laboratory is located in the office building. The lab generates small quantities (5 gallons or less) of satellite accumulation wastes, which are taken to the hazardous waste storage building for storage prior to shipment to an off-site permitted disposal facility.

The loading/unloading area is used for the loading, unloading, and permitted 10-day transfer storage of hazardous waste. Transport vehicles delivering shipments of hazardous waste back into any one of seven available loading/unloading docks. The docks have roll-up doors, which allow unloading directly from transport vehicle to the waste storage building. Outbound waste shipments are loaded in a similar manner. The loading and unloading areas are shown on Attachment 5.13. Loading, unloading, and transfer facility operations are described in more detail in Section 14 of this permit application.

The waste is loaded directly from the storage building to the transport vehicle. The loading/unloading area is an impervious contained surface constructed of concrete and asphalt. There is a ten-foot roof overhang from the storage building over the loading/unloading area. All stormwater run-offs from the loading/unloading area can be contained and inspected prior to release to the stormwater management system. The stormwater system is shown on Attachment 5.15 and described in more detail in the Section 14 of this permit application. Surface water flow is shown on Attachment 5.11.

## 8. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

### GENERAL INFORMATION

#### Introduction

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

2002 N. Orient Road  
Tampa, Florida 33619  
FLD 981 932 494

The facility ~~is located on~~ consists of a 4.46 (MOL) site ~~.14 acres (M.O.L.) of land on Orient Road. EQ also has 3.06 acre (MOL) adjacent (contiguous property) to the hazardous waste permitted site.~~ 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, safety and fire alarms and equipment. The equipment and systems are described in other sections of this Plan. A site layout is included in Attachment 8.1.

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. A lower explosion limit (LEL) system is located in the flammable area. An automatic ventilation system is activated at 20% of the LEL. The automatic foam fire suppression system, fire alarm, and monitoring service emergency call to the Tampa Fire Department are activated at 30% of the LEL.

Fire extinguishers and fire hoses are located throughout the facility. Safety equipment, proximity suits, SCBA and material handling equipment are located at the site. Emergency safety equipment is listed in Attachment 15 and shown on Attachment 8.2. 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.

In the event of a power outage, emergency backup lighting is provided in the facility, and the ADT security system will activate its backup battery.

In order to prevent releases to the atmosphere, containers will remain closed at all times except when it is necessary to add or remove waste from the container.

All operations personnel at this site are trained in emergency response, hazardous waste operations, fire fighting procedures, emergency first aid, and CPR.

### **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, floods, hurricanes or an unplanned sudden and non-sudden release into the environment of hazardous waste including liquids, vapors and particulates which could cause harm to human health or the environment.

## EQ Florida, Inc. Contingency Plan

### Emergency Response Coordinators:

	Coordinator	Primary Alternate	Secondary Alternate
<b>Name</b>	Robert Mulholland	Stuart Stapleton	Larry Sinatra
<b>Address</b>	1417 Butch Cassidy Tr.	619 Cedar Grove Dr.	6812 N. River Blvd.
<b>City, State, &amp; Zip</b>	Wimama, FL 33598	Brandon, FL 33511	Tampa, FL 33604
<b>Work Phone #</b>	813-319-3410	813-319-3423	813-319-3418
<b>Home Phone #</b>	813-642-8347	813-412-2302	N/A
<b>Mobile #</b>	813-205-4327	813-770-9954	813-598-0514

At all times, there will be at least one employee either at the facility 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 facility operations, the location and characteristic of wastes managed, the location of facility records, and the facility layout. The EQ Emergency Response Coordinator and Alternates have the authority to commit the resources needed to carry out the EQ Contingency Plan.

All emergency Coordinators and Alternates have authority to commit corporate funds 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.

EPA Region IV	Any evacuation, traffic or security issue	404-562-8705(24hr) 404-562-8700
City of Tampa – Storm water	If potential for contamination	813-259-1693 813-622-1901
Clark Environmental	If additional Resources are needed	863-425-4884

## EMERGENCY EQUIPMENT AND COMMUNICATIONS SYSTEMS

This chapter describes the emergency equipment and alarm systems at the EQ facility. This equipment is listed in Attachment 15.

### Emergency Equipment

1. **Fire extinguishers** are located throughout the building and prominently identified by signs and red markings. ABC extinguishers are located in Bays 1 and 3. Halon and metal-x extinguishers are located in the flammable storage area (Bay 2).
2. **Chemical Spill Treatment Kit** containing 6 2-pound containers of Spill-X-S (100% carbon) used for solvent spills is located in Bay 2.
- ~~2. **Hazorb (or equivalent) sorbent** used to absorb any chemical spill. Located in bags identified by name in Bays 1 and 3.~~
3. **Oil-Dri** and **Vermiculite** are used for solvent and oil spills. Located on the ramp leading to Bay 3 in bags identified with the words Oil-Dri or Vermiculite.
4. **Soda Ash** ~~Calcium carbonate~~ and ~~lime~~ are is used to neutralize acids. Located in Bay 1 in bags identified by the words ~~Calcium Carbonate or Lime~~ Soda Ash.
5. **Caustic Spill Treatment Kit** containing 6 2-pound containers of Spill-X-C (75% Citric Acid) used for caustic spills is located in Bay 3.
- ~~5. **Citric Acid** is used to neutralize alkalines. Bags are identified by the words Citric Acid.~~
6. **Spill control/sorbent booms/pads** used to contain any spill. Spill control booms are available in various lengths and are located in Bays 1 and 3.
7. **Protective Clothing** including PVC suits and polyethylene splash suits are located in Bays 1 and 3. 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**, located in Bays 1 and 3, **air-line respirators** and **SCBA**, located in Bay 3, are available for respiratory protection.
9. **Gloves, boots, face shields, goggles and hard hats** may be used as protective equipment and are located in Bays 1 and 3.
10. **Acid Spill Treatment Kit** containing 6 2-pound containers of Spill-X-A (78% Magnesium Oxide) used for caustic spills. Is located in Bay 1.
- ~~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 and are capable of fitting inside of a drum bung are located in Bays 1 and 3.
12. **Manual pump** for removal of any flammable liquids are located in Bays 1, 2, and 3.
- ~~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**.~~
13. 15. **Shovels, brooms, buckets, mops, tools, bung wrenches**, etc. are located in Bays 1, 2, and 3.
- ~~14. 16. **Telephones** located on the north and south walls of the main storage area and in the office area.~~
15. 17. Empty **DOT-approved containers** for recontainerizing damaged or leaking containers are located in Bays 1 and 3.
16. 18. Empty **85 and 110 gallon overpack drums** for recontainerizing damaged or leaking containers are located on the ramp leading to Bay 3.
17. 19. An **Emergency eye wash/shower** is located in both Bays 1 and 3. ~~the processing and storage areas (Bay 1). **Eye wash systems** are located in the building (Bays 1 and 3).~~
18. 20. **Flame and smoke detectors** are located in the flammable storage area. **Lower explosive limit (LED LEL)** monitors are located in the flammable storage area and smoke detectors are available in the general storage area.

Additional empty DOT-approved drums, oil dri, vermiculite and sorbent boom are located in

Mailing List

Assistant Fire Marshall Brown Tampa Fire Department 808 East Zack Street Tampa, FL 33602	Chief Houge Tampa Police Department 411 North Franklin Street Tampa, FL 33602
David Park Brandon Regional Hospital 119 Oakfield Drive Brandon, FL 33511	Tony Venezia Tampa General Hospital P.O. Box 1289 Tampa, FL 33601-1289
Tony Payne SWS First Response 901 McClosky Blvd. Tampa, FL 33605	Jim Clark Clark Environmental, Inc. 755 Prairie Industrial Parkway Mulberry, FL 33860
Bill Lofgren Tampa Bay Regional Planning Council 4000 Gateway Centre Blvd. Suite 100 Pinellas park, FL 33782	<u>Merlin D. Russell Jr.</u> <del>John Griffin</del> Florida DEP Division of Waste Management 2600 Blair Stone Road M.S. 4560 Tallahassee, FL 32399-2400
Jim Dregne Florida DEP Southwest Division Division of Waste Management 13051 North Telecom Parkway Temple Terrace, FL 33637	United States Coast Guard ATTN: Facilities 155 Columbia Drive Tampa, FL 33606

## **9. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING**

### **REQUIRED NOTICES**

Generators will be notified in writing that EQFL has the appropriate permit for, and will accept, the waste the generator is shipping. Copies of this written notice are kept as part of the operating record. Copies of the EQFL permit are available for review. EQFL does not receive hazardous waste directly from a foreign source. The Regional Administrator will be notified in writing at least 2 (two) weeks in advance of the date the waste is expected to arrive at the facility if EQFL arranges to receive hazardous waste from a foreign source.

The EQFL owner or operator will notify any new owner or operator in writing of the required notices of 40 CFR Parts 264.12 and 270 before transferring ownership or operation of the EQFL facility during its operating life. There are currently no plans to transfer ownership or operation of the EQFL facility.

### **USE OF MANIFEST SYSTEM**

All hazardous wastes entering and leaving the EQFL facility will be accompanied by a Uniform (or State) Hazardous Waste Manifest. ~~Nearly all hazardous waste leaving the facility is shipped out of state. Many destination states for the hazardous waste shipments utilize their own state manifests. The appropriate state or uniform hazardous waste manifest will be utilized as required by the receiving state.~~ All manifested hazardous waste shipments will be accompanied by Land Disposal Restrictions certifications. For inbound (receiving) waste shipments, the EQFL facility owner, operator, or agent will:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest is received;

release of hazardous waste or hazardous waste constituents. The EQFL SWMUs are identified on the map included as Attachment 5.14. Photographs of the SWMUs are included as Attachment 6.3. The filter press is not currently in use, and ~~has been removed as a treatment process.~~

The following information describes the waste generation and activity at the identified SWMUs:

**SWMU #1 (Concrete Container Storage Area (Enclosed Building) and Five (5) Sumps):**

The concrete container storage area enclosed building is used to store and treat containers (primarily 55- gallon drums) of permitted hazardous and non-hazardous wastes. The container storage area is composed of three (3) separate containment bays having a total of five (5) collection sumps. Each collection sump has a capacity of 1,000 gallons. The collection sumps are seamless and made of pre-cast concrete coated with sealant. The floor is sloped at a grade of 1/8 inch per foot on all four sides to the collection sump. A similar floor design and collection sump exists in the flammable/combustible storage area. The maximum storage area and sump volumes capacities are 50,000 gallons and 5,000 gallons respectfully. The interior storage areas and sumps are visually inspected daily.

**SWMU #2 (Loading/Unloading Dock):**

The loading/unloading dock is a concrete surface to load and unload permitted hazardous and non-hazardous wastes. The loading area is covered by a roof and sloped towards the containment trench. The area also contains an epoxy coated improved containment area in front of Bay 2.

tight polymeric inner shell with high-temperature, high-strength plastic internal components. The sand filter has specifications which include 24.5 inch by 37.5 inch dimensions, a flow rate of 20 gpm per square foot, and a 3.1 square foot filter area.

**SWMU #7 (Sanitary Sewer Drain field and Septic Tank):**

The Sanitary Sewer Drain field and Septic Tank is located in the Northwest corner of the Orient Road property. The system received sanitary sewage originating from the facility. The system is no longer in use.

**SWMU #8 (Transfer Facility)**

The Transfer Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #9 (Used Oil Facility)**

The Used Oil Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #10 (Satellite Accumulation Area)**

The Satellite Accumulation Area is located in the Laboratory on the 8<sup>th</sup> Avenue property. The material collected in the satellite accumulation area includes various types of debris associated with container sampling and the containerization of collected samples. Accumulated material is transferred to the Orient Road property for further processing and disposal.

**SWMU #11 (Parts Washer)**

The parts washer is located in the maintenance area on the 8<sup>th</sup> Avenue property. The washer consists of a metal sink fixed to a 30-gallon drum of part cleaning solution. The solution is pumped from the drum into the sink where the parts are washed and cleaned. The solution is drained back into the drum when the cleaning is completed. The solution is reused until it is no

longer useful and at that point it is sent off-site for recycling.

#### **SWMU #12 (Material Processing Facility)**

The Materials Processing Facility is a 8,050 square foot building located on the 8<sup>th</sup> Avenue property. The building is used for processing, staging, storage and management of non-RCRA regulated solid waste. Processing includes segregation, decanting, filtration, transfer, shredding, or solidification. The storage capacity of the Materials Processing Facility is 185,650 gallons. The containment provided by the 8-inch high concrete curb and two 50-gallon sumps is 32,676 gallons which is sufficient to hold 110% of the largest container (a 7660 gallon constructed steel welded box used in the solidification process) or 10% of the total volume of the waste permitted to be stored in the building.

#### **SWMU #13 (Solid Waste Operations Area)**

The Solid Waste Operations Area is located on the 8<sup>th</sup> Avenue property and is used for the storage of roll-off boxes that are full of the solidified material created in the Materials Processing Facility. The roll-off boxes are staged in this area and are waiting for outbound transportation. The area consists of a 2,288 square foot covered concrete pad and has a capacity of 20,200 gallons. Since no liquids are stored in this area, there is a leachate collection system for secondary purposes.

#### **SWMU #14 (Additional Retention Pond)**

The additional Retention Pond is located on the 8<sup>th</sup> Avenue property and collects storm water from the roof of the Material Processing Facility. The retention pond was sized for both the permanent pool volume required and the 1" runoff storage (temporary pool).

**SWMU #15 (Universal Waste Lamp Storage Area)**

The Universal Waste Lamp Storage Area is located on the Orient Road property. The material is stored in a box van with a storage capacity of 1,104 cubic feet.

**SWMU #16 (Universal Waste Battery Storage Area)**

Universal Waste Battery Storage Area is located in the loading/unload dock 3C. This area is covered by a roof and sloped towards the containment trench.

The EQFL facility is located in a heavily industrialized area (Orient Park) in Tampa, Florida. The previous use of the EQFL property was residential (one residence) and vacant land. There is significant documented groundwater contamination in the Orient Park area. Two NPL (Superfund) sites adjacent to the EQFL facility are being investigated and remediated under the direction of the EPA. There are also several other sites or former sites potentially contributing to the documented Orient Park groundwater contamination.

EQFL voluntarily monitors the groundwater from its property for liability protection. The EQFL voluntary groundwater monitoring wells are identified on Attachment 8.1, the facility record drawing (site plan and survey). The wells are sampled and analyzed, at minimum, annually. The selection of constituents to analyze for is dynamic and depends on the results of previous analyses and on the results of analyses from other facilities in the area (particularly the National Priorities List sites). Copies of previous analytical results are on file with the DEP. Several regulated compounds have been detected by the EQFL groundwater monitoring program. All hazardous waste stored at EQFL is in a specially designed totally enclosed storage building with over 5,000 gallons of secondary containment. There have been no releases of hazardous waste to the environment at the EQFL facility. There is no statistical correlation between downgradient and upgradient analytical results to confirm contribution to any groundwater contamination by EQFL. It is the belief of EQFL that any elevated levels of regulated compounds detected in the groundwater at the EQFL property is either background or the result of off-site migration

EQ FLORIDA (EQFL)

**SWMU IDENTIFICATION SUMMARY**

<b>SWMU NO.</b>	<b>TYPE OF UNIT</b>	<b>YEARS OF OPERATION</b>	<b>WASTE MANAGED</b>	<b>EVIDENCE OF RELEASE</b>
1 (RCRA)	Container Storage Facility Sumps (5 ea)	June 1990– Present	Permitted Wastes	None
2 (RCRA)	Loading/Unloading Dock	June 1990– Present	Permitted Wastes	None
3	Stormwater Retention Pond	June 1990– Present	Stormwater	None
4 (RCRA)	Filter Press	June 1990– 2002	Non-hazardous wastes (One-time test batch)	None
5	Municipal Waste Dumpster	June 1990– Present	RCRA empty containers, office wastes	None
6	Stormwater Carbon & Sand Filter	June 1990– Present	Stormwater	None

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## 43 TC wastes

Disposal is off-site via stabilization and landfill.

### **CLOSURE PERFORMANCE STANDARDS**

EQFL plans to continue operating the EQFL permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. This Closure Plan is submitted to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure of the EQFL facility will be done in a manner that minimizes the need for further care. All hazardous waste and hazardous waste constituents will be properly managed at closure so that post closure care and post closure potential for releases of hazardous waste or hazardous waste constituents are eliminated. The EQFL Closure Plan complies with the requirements of 40 CFR 264 Subpart G. It is the intent of this plan to protect human health and the environment from any release of hazardous materials or constituents.

Closure and the closure cost estimate is based upon a third party completely managing and conducting all closure activities.

### **PARTIAL AND FINAL CLOSURE ACTIVITIES**

Final closure activities will include the removal of all hazardous waste and hazardous waste constituents from the facility for shipment to permitted treatment and disposal facilities. Final closure also includes the decontamination of all equipment, the floors inside of the waste management building, the containment sumps, the inside walls of the building (three feet up), and the loading/unloading areas (the paved area from the building to five feet out and the outside of the warehouse dock wall from the ground up to the floor level).

or hazardous waste constituents were to occur by the facility, the most likely path of migration would be the stormwater system. The inclusion of two additional soil samples allows an upgradient sample from the northeast corner of the facility and a downgradient sample from the southeast corner of the facility to be investigated beyond the stormwater retention area. A soil sample from under the building will also be taken. Additional soil samples will be taken in any area with visual evidence of contamination. Soil samples will also be taken under buildings or in sumps if there are visible cracks or indications that contamination could have migrated into soils and/or groundwater.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to a permitted hazardous waste treatment/disposal facility. The floors and sumps will then be decontaminated by steam cleaning. The facility warehouse inner walls will be decontaminated three feet up from the floor. The loading/unloading area will be decontaminated. The loading/unloading area to be decontaminated includes the dock exterior wall from the ground up to the warehouse floor level and the paved ground from the building to out five feet. This liquid will be analyzed for organic solvents and TCLP constituents to determine its acceptability for disposal.

All decontamination will be done and certified by outside contractors. Samples of rinse waters will be taken and analyzed to confirm all washed areas as sufficiently decontaminated.

It is estimated that no more than four weeks will be required to fully decontaminate all equipment and the storage facility itself.

#### Closure Certification

Closure certification (as well as all other closure activities) will be conducted by an independent third party.

An independent registered professional engineer licensed within the State of Florida will

## **CERTIFICATE OF CLOSURE**

Prior to the implementation of the closure plan, EQFL will meet with FDEP to discuss the details of the closure plan. Based upon new regulations and/or guidance or policy issues, the plan may need to be amended and/or updated prior to its implementation.

Within 60 days of the closure of each hazardous waste unit and within 60 days of the final closure of the facility, EQFL will submit to the FDEP, by registered mail, a certification that the facility has been closed in accordance with the EQFL Closure Plan. The certification will be signed by the owner or operator and by an independent registered professional engineer. Documentation supporting the closure certification will be included in this submittal.

The EQFL facility has no disposal units. Therefore, no survey or post closure care is required.

The EQFL Closure Plan will be amended as per the requirements of 40 CFR 264 Subpart G if amendments are necessary.

applicable) will be unloaded within five (5) consecutive calendar days (excluding holidays) of arrival at the facility. Bulk hazardous waste shipments manifested to EQFL will be shipped off-site upon approval from the final disposal facility for acceptance and scheduling of waste. EQFL will notify the DEP if any unforeseen problems require exceeding the original 24 hours.

### **Processing Areas**

Inbound waste shipments may be unloaded into the warehouse to a temporary processing area for obtaining samples and waste verification. The temporary processing area will have separate containment by utilizing a temporary dike, boom or berm. Inbound waste will be stored in the temporary processing area for a maximum of three operating days. All applicable requirements such as inspections and operating record will apply to these wastes. The processing area will be designated with a sign.

Temporary processing areas have been identified on Attachment 5.12A. The areas are normally utilized as permitted hazardous waste storage and processing areas. A temporary berm or containment will be utilized to designate and contain the temporary processing area when in use. A sign designating "Temporary Processing Area" and "Temporary Processing Start Date \_\_\_\_\_" will also be utilized for each temporary processing area. The temporary processing area, temporary berm or containment will contain the volume of the largest container or 10% of all containers in the temporary area (whichever is greater).

Hazardous waste designated for outbound shipments may be moved to a temporary processing area. Outbound compatible hazardous wastes in their designated storage bay will be stored a maximum of 10 days in the temporary processing area. Outbound hazardous wastes managed in the temporary processing areas will be limited to five (5) operating days maximum if the wastes are incompatible or are not in their designated storage bay. All applicable requirements such as inspections and operating records will apply to these hazardous wastes.

complete. The loading/unloading area will be inspected after each loading operation. Any drippage or residue will be cleaned up. If drippage occurs, it will be contained by disposable plastic sheeting and/or absorbent materials. Disposable items containing waste residues will be managed appropriately as solid or hazardous waste. The stormwater system will be turned back on only when any material processing has been stopped and inspection verifies that the area has been properly cleaned if necessary.

### **Universal Waste**

The facility receives Universal Waste including batteries and mercury-containing lamps such as fluorescent lamps. Once received, the lamps and batteries are placed in storage. Universal Waste batteries are stored on the loading/unloading area 3C as illustrated on figure 5.13. The storage location for the Universal Waste Lamps is also illustrated on figure 5.13.

### **Paint Can Processing**

The facility receives water-based latex and solvent-based paint in cans for recontainerization and disposal. The majority of the paint received is from household waste. This operation includes manually pouring the paint to a container or processing the paint cans through the processing unit which crushes the cans, separating the paint from the emptied container. Equipment specifications of the paint can processor are included as Attachment 16.3.

EQFL will use best management practices when operating the unit. Practices include using plastic sheeting to contain any drippage. Each hazardous waste stream processed by the unit will have had waste analysis completed as described in the Waste Analysis Plan.

### **Aerosol Can Recycle**

The aerosol can recycler is a machine which crushes aerosol cans while simultaneously capturing all liquids into a 55 gallon drum. The aerosol can is placed within an enclosed unit and is punctured. The material within the can is ejected into the drum. A filter unit is attached to the machine to capture any vapors expelled from the drum/can during the

## 15. MISCELLANEOUS UNITS (Filter Press)

### FILTER PRESS DESCRIPTION

The only miscellaneous unit at the facility is the filter press located in an enclosed building with containment. The filter press is used to separate sludge waste into liquid and solid components. Sludge is pumped directly from a container through the press where a filter bank captures the solid material. The liquid component is collected in an empty container. After all the sludge has been processed, the filters are cleaned and the solids containerized as waste. This unit is typically used to process sludge that contain heavy metal and nonorganic materials. The unit is shown on Attachments 5.12, 5.14, 6.1, and 8.2. Manufacturer's specifications for the unit are included as Attachment 13.

When in use, the unit will be located within the enclosed storage building. The unit is currently unused and in storage. ~~It may be made mobile for use off-site at generator locations.~~ The unit will be located in the storage building during any on-site treatment. Treatment by the filter press is a batch process and not continuous. The filter press is air-operated, has no electrical parts, and will automatically shut down if air pressure is lost. If an emergency occurs, the process will cease and all open waste containers will be closed. Shutdown will occur, and any waste transfer or treatment operation will stop.

The maximum volume of waste treated by the filter press is estimated to be 6,000 gallons per day. EQFL currently does not use the filter press but, may (in the future) treat a maximum of 6,000 gallons per day of hazardous wastes prior to the expiration of the permit should business, environmental regulations, or economics justify the treatment.

operation. The press will be shut down and plates opened allowing the filtered solids to be discharged to a container. Liquids and solids treated by the press will be analyzed to verify treatment and Land Disposal Restrictions (LDR) compliance as specified in 40 CFR 268. Hazardous waste solids will be placed in the proper transfer or storage location pending scheduling of outbound shipment to a permitted facility. Solids which are not hazardous waste (~~LDR certified and met~~) will be placed in the proper transfer or storage location pending scheduling of outbound shipment to an approved facility. Filtered liquids will usually have been treated to the treatment standards specified in the LDR of 40 CFR 268. Treatment will be verified prior to disposal or off-site shipment. Treated filtered liquids may be discharged to Publicly Owned Treatment Works (POTW) or placed in the proper transfer or storage location pending scheduling of outbound shipment to an approved facility. Filtered liquids that are hazardous waste will be placed in the proper transfer or storage location pending scheduling of outbound shipment to a permitted facility.

The EQFL Treatment Log (Attachment 13) will be completed to document all treatment in the EQFL Operating Record. The filter press will be cleaned and decontaminated as necessary. All rinses and residues will be managed (at minimum) in the same manner as the waste processed through the press unless waste analysis determines otherwise. The press will be inspected upon completion of the treatment and clean-up.

### **Container Loading**

Typically, wastes are recontainerized from one container to another. Wastes are transferred between container by pumping (using a portable pump) or pouring directly from one container to another. Most container transfer operations take place within the storage building, loading to roll-offs and tankers will occur in the processing area located on the west (loading dock) side of the facility. Potential emissions due to container loading have been estimated.

### **Paint Can Processing**

The facility receives latex and solvent-based paint in one-gallon cans for recontainerization and disposal. This operation will include manually pouring or automatically processing with the paint can processor, crushing the paint can, collecting the paint waste, and containerizing the paint for transport off-site. Potential VOC emissions may result due to evaporation of solvents in the paint.

### **Aerosol Can Recycle**

The aerosol can recycler is a machine which crushes aerosol cans while simultaneously capturing all liquids into a 55 gallon drum. The aerosol can is placed within an enclosed unit and is punctured. The material within the can is ejected into the drum. A activated carbon filter unit is attached to the machine to capture any vapors expelled from the drum/can during the recycling operation. This operation will take place within the paint can crushing operations located in area 2A as illustrated on figure 5.13. Equipment specifications of the aerosol can recycling unit are included as Attachment 16.2.

A breakthrough detector is provided on the carbon canister to determine when the charcoal filter has reached its saturation point. The detector changes to a rusty brown color when it has reached its saturation level. The filters or filter media will be changed out as per the manufacturer's specifications (or equivalent). Spent filters will be managed as solid or hazardous waste (based upon waste determination). Filter specifications for the aerosol recycling unit suggest using approximately ½ pound of activated carbon per 1,200 aerosols.

Other assumptions made for the emission estimates will also produce conservative results:

1. The effect of the storage building for containment of VOC emissions was not taken into consideration. All evaporation was assumed to occur outdoors to ambient air ~~without the vapor control benefits of the building enclosure~~. Most operations occur within the storage building by the roll up doors.
2. True vapor pressure at a temperature of 90 degrees Fahrenheit (deg F) was assumed for all emission calculations. Mean annual temperatures in the Tampa area for years 1961 through 1998 were approximately 82 deg F. Therefore, assuming a vapor pressure at 90 deg F would result in higher emission estimates on an annual basis.

Potential VOC emissions have been estimated for several operations at the facility. A summary of primary activities at the facility and estimated emissions is included on Table 1. Emission calculations for individual operations are included on Tables 2 through 6.

Total facility emissions were estimated to be just over 2.24 TPY. As mentioned, these emissions are based on conservative assumptions and actual emissions are expected to be much less.

### **Lead**

Lead is considered to be the most significant toxic heavy metal constituent handled at the facility. It is estimated that approximately 20 percent of all waste handled contains some quantity of lead. RCRA regulated lead hazardous waste managed usually ranges from 5 to 500 parts per million in concentration. Therefore, the amount of lead present at the facility is less than the amount of VOC present. Because the vapor pressure of lead in aqueous solution is much lower than for VOC, lead emissions are expected to be negligible based on the conservative estimate for VOC emissions.

#### **40 CFR 61 Subpart FF- Emission Standard for Benzene Waste Operations**

This subpart applies to owners and operators of chemical manufacturing plants, coke byproduct recovery plants, and petroleum refineries, or owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any of the affected facilities. Because EQFL does not currently accept waste from these facility types, this subpart does not apply.

#### **40 CFR 264 Subpart BB- Emission Standards for Equipment Leaks General**

Compliance with the requirements of 40 CFR 264, Subpart BB will be attained by the following the procedures described in this section. This section requires facilities to identify and repair leaks in specified pieces of equipment. Equipment is considered to be leaking when materials are dripping from pump seals or valves, or when an instrument reading of greater than 10,000 ppm is measured. The detection instrument used for monitoring will meet the performance criteria of Reference Method 21 in 40 CFR part 60. Equipment used to transfer hazardous waste (with an organic concentration of at least 10 percent by weight) at EQFL is used less than 300 hours per calendar year. Equipment in vacuum service is also used. This equipment is exempt from the requirements of Sections 264.1052 through 264.1060 once identified as required by 264.1064 (g)(5) and (6). EQFL uses the pumps in light liquid service and trucks in vacuum service as identified below.

##### **Pumps in Light Liquid Service**

EQFL will utilize pumps to transfer materials within the processing area of the permitted facility. The total use of equipment subject to the requirements of this subpart will not exceed 300 hours per calendar year. Each pump will be inspected visually each calendar week to determine that no indications of leaking liquids from the pump seals are present. Additionally, if an instrument reading of greater than 10,000 ppm is measured the pump will be considered to be leaking. If a leak is detected it will be repaired as soon as practical, not to exceed 15 calendar days. No pump that is known to leak will be used for hazardous waste transfer operations. Further information concerning recontainerization procedures is included in Section 14 of this permit application.

### **Trucks in Vacuum Service**

EQFL will utilize equipment that is in vacuum service. Vacuum trucks identified as EQFL unit #s 50021, 50034, 50037, 50038, 9001, 18057 and 11111, used to transport and transfer hazardous materials, are listed as required.

### **40 CFR 264 Subpart CC- Air Emission Standards for Tanks, Surface Impoundments, and Containers**

#### **General**

EQFL stores hazardous waste in containers greater than 26 gallons and as such must follow the requirements of 40 CFR 264 Subpart CC. Most of the hazardous waste processed by EQFL will have a VO concentration of greater than 500 ppmw. In most cases, hazardous waste that may have a VO concentration of less than 500 ppmw and will be managed as if it does have a VO concentration of greater than 500 ppmw. EQFL does not have any existing tanks, surface impoundments or hazardous waste stabilization treatment processes and therefore these items are not addressed in this permit.

#### **Standards for Containers**

EQFL shall control air pollutant emissions from all containers stored or processed at the permitted facility. The transfer of hazardous waste in or out of containers will be accomplished in a manner that minimizes the exposure of hazardous waste to the atmosphere. This will be done to the extent practical, considering the physical properties of the hazardous waste and good engineering practices. Containers having a design capacity of  $0.1\text{m}^3$  -  $0.46\text{ m}^3$  will be managed using U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as a Level 1 control standard. Containers will comply with the requirements of 49 CFR part 178, except as permitted by EQFL approved DOT exemption for lab packs managed in accordance with 49 CFR part 178 or combination packages specified in 49 CFR 173.12. Containers having a capacity of greater than  $0.46\text{ m}^3$ , that are in light service, will also comply with these DOT standards, as required, to provide Level 2 control. Containers meeting these standards are designed so that any potential release of VO concentrations are eliminated with proper care and use. EQFL will ensure that containers have secured closure devices (drum lid,

**ATTACHMENT NO. 2**

**EQ FLORIDA INC. (EQFL)  
Summary of Characteristic and Listed Hazardous Wastes**

Process Code	EPA Hazardous Waste Number	Waste Type	Estimated Annual Quantity (Gallons)
S01	D001	Ignitable	175,000
S01	D002	Corrosive	50,000
S01	D003	Reactive	5,000
S01	"D" Characteristic Waste (Excluding D001-D003)	Characteristic Hazardous Waste	90,000
S01	F001 & F002	Halogenated Solvents	10,000
S01	F003 & F005	Non-Halogenated	Included in D001
S01	F006-F012 & F019	Plating Wastes	24,000
S01	"F" Listed Wastes (Excluding F001, F002 F001, F005-F012, & F019)	Listed Wastes from Non-Specific Sources	1,000
S01	"K" Listed Wastes	Listed wastes from Specific Sources	1,000
S01	"U" Listed Waste	Toxic Wastes	20,000
			<hr/> 377,000
T40	"D" Characteristic Waste (Excluding D001 & D003)	Characteristic Hazardous Waste	0*
T40	"F" Listed Wastes (Excluding F020-F023, F026, and F027)	Listed Waste from Non-Specific Sources	0*
			<hr/> 0*

\* EQFL currently does not plan to treat any wastes by using the filter press. EQFL may (in the future) treat wastes prior to the expiration of the permit should business, environmental regulations, or economics justify the treatment. Annual quantities will not exceed those permitted in Section 15.

## BAY CAPACITIES:

Bay 1 - 20,000 gallons  
Bay 2 - 10,000 gallons  
Bay 3 - 20,000 gallons

Each bay may contain hazardous wastes with any of the **EQFL** permitted waste codes. The hazardous waste is segregated into separate bays (and containment) by hazard class and compatibility, not by waste code. Storage location by waste (hazard class) is indicated on Attachment 5.12.

## Listed Wastes from Specific Sources

K044	K107	K123	K147	K162
K045	K108	K124	K148	K163
K046	K109	K125	K149	K164
F047	K110	K126	K149	K165
	K111		K150	K166
K064	K112	K131	K151	
K065	K113	K132		
K066	K114		K156	
	K115	K136	K157	
K088	K116		K158	
	K117	K140	K159	
K090	K118	K141	K160	
K091		K142	K161	
		K143		
		K144		
		K145		

## EPA Hazardous Waste Codes

### Characteristic Wastes

D001	D013	D025	D037
D002	D014	D026	D038
D003	D015	D027	D039
D004	D016	D028	D040
D005	D017	D029	D041
D006	D018	D030	D042
D007	D019	D031	D043
D008	D020	D032	
D009	D021	D033	
D010	D022	D034	
D011	D023	D035	
D012	D024	D036	

### Listed Wastes from Non-Specific Sources

F001	F006	F019	F032
F002	F007		F034
	F008	F020	F035
F003	F009	F021	
F005	F010	F022	F037
	F011	F023	F038
F004	F012	F024	F039
		F025	
		F026	
		F027	
		F028	

Listed Wastes from Specific Sources

K001	K047	K090	
K002	K048	K091	K147
K003	K049		K148
K004	K050	K093	K149
K005	K051	K094	K150
K006	K052	K095	K151
K007		K096	
K008	K060	K097	K156
K009	K061	K098	K157
K010	K062	K099	K158
K011		K100	K159
	K064	K101	K160
K013	K065	K102	K161
K014	K066	K103	
K015		K104	K162
K016	K069	K105	K163
K017		K106	K164
K018	K071	K107	K165
K019		K108	K166
K020	K073	K109	
K021		K110	
K022	K083	K111	
K023	K084	K112	
K024	K085	K113	
K025	K086	K114	
K026	K087	K115	
K027	K088	K116	
K028		K117	
K029		K118	
K030			
K031		K123	
K032		K124	
K033		K125	
K034		K126	
K035			
K036		K131	
K037		K132	
K038			
K039		K136	
K040			
K041		K140	
K042		K141	
K043		K142	
K044		K143	
K045		K144	
K046		K145	

Acute Toxic Hazardous Waste

P001	P036	P070	P108
P002	P037	P071	P109
P003	P038	P072	P110
P004	P039	P073	P111
P005	P040	P074	P112
P006	P041	P075	P113
P007	P042	P076	P114
P008	P043	P077	P115
P009	P044	P078	P116
P010	P045		
P011	P046	P081	P118
P012	P047	P082	P119
P013	P048		P120
P014	P049	P084	P121
P015	P050	P085	P122
P016	P051		P123
P017		P087	
P018	P054	P088	P127
		P089	P128
P020	P056		
P021	P057	P092	P185
P022	P058	P093	
P023	P059	P094	P187
P024	P060	P095	P188
		P096	P189
P026	P062	P097	P190
P027	P063	P098	P191
P028	P064	P099	P192
P029	P065		P193
P030	P066	P101	P194
P031	P067	P102	P195
	P068	P103	P196
P033	P069	P104	P197
P034		P105	P198
		P106	P199
			P200
			P201
			P202
			P203
			P204
			P205

Toxic Wastes

U001	U052	U103	U152	U204	U409
U002	U053		U153	U205	U410
U003		U105	U154	U206	U411
U004	U055	U106	U155	U207	
U005	U056	U107	U156	U208	
U006	U057	U108	U157	U209	
U007	U058	U109	U158	U210	
U008	U059	U110	U159	U211	
U009	U060	U111	U160		
U010	U061	U112	U161	U213	
U011	U062		U162	U214	
U012	U063	U113	U163	U215	
	U064	U114	U164	U216	
U014		U115	U165	U217	
U015	U066	U116	U166	U218	
U016	U067	U117	U167	U219	
U017	U068	U118	U168	U220	
U018	U069	U119	U169	U221	
U019	U070	U120	U170	U222	
U020	U071	U121	U171	U223	
U021	U072	U122	U172		
U022	U073	U123	U173	U225	
U023	U074	U124	U174	U226	
U024	U075	U125		U227	
U025	U076	U126	U176	U228	
U026	U077	U127	U177		
U027	U078	U128	U178	U234	
U028	U079	U129	U179	U235	
U029	U080	U130	U180	U236	
U030	U081	U131	U181	U237	
U031	U082	U132	U182	U238	
U032	U083	U133	U183	U239	
U033	U084	U134	U184	U240	
U034	U085	U135	U185		
U035	U086	U136	U186	U243	
U036	U087	U137	U187	U244	
U037	U088	U138	U188		
U038	U089	U139	U189	U246	
U039	U090		U190	U247	
	U091	U140	U191	U248	
U041	U092	U141	U192	U249	
U042	U093	U142	U193		
U043	U094	U143	U194	U271	
U044	U095	U144			
U045	U096	U145	U196	U277	
U046	U097	U146	U197	U278	
U047	U098	U147		U279	
U048	U099	U148	U200	U280	
U049		U149	U201	U328	
U050	U101	U150	U202		
U051	U102	U151	U203	U353	

**ATTACHMENT N0.5**  
**FACILITY DRAWINGS & MAPS**

- 5.1 Location Map
- 5.2 Aerial Photography
- 5.3 City of Tampa Zoning Map
- 5.4 Topographical Map
- 5.5 Flood Plain Map
- 5.6 Existing Land Use and Owners
- 5.7 Traffic Flow
- 5.8 Security
- 5.9 Evacuation Routes
- 5.10 Routes to Hospitals
- 5.11 Surface Water Flow, Drainage, and Run-Off
- 5.12 Container Storage Building Diagram (Overview)
- ~~5.12A Container Storage Building Diagram (Waste Locations)~~
- 5.13 Loading/Unloading Areas
- 5.14 Solid Waste Management Units
- 5.15 Stormwater Filtration System
- 5.16 Waste Management Locations

EQ Florida, Inc.

**Solid Waste Management Unit (SWMU)  
Identification Summary**

SWMU NO.	TYPE OF UNIT	YEARS OF OPERATION	WASTE MANAGED	EVIDENCE
1 (RCRA)	Container Storage Area / 5 sumps	June 1990 - Present	Permitted Wastes	None
2 (RCRA)	Loading/Unloading Dock	June 1990 - Present	Permitted Wastes	None
3	Stormwater Retention Pond	June 1990 - Present	<del>Permitted Wastes</del> Stormwater	None
4 (RCRA)	Filter Press	June 1990 - Present (currently not in use)	Non-Hazardous (one time test) batch	None
5	Municipal Waste Dumpster	June 1990 - Present	RCRA Empty Containers, Office Waste	None
6	Stormwater Carbon & Sand Filter	June 1990 - Present	Stormwater	None
7	<u>Sanitary Sewer Drain field and Septic Tank</u>	<u>June 1990 - June 1995</u>	<u>Sanitary Sewage</u>	<u>None</u>
8	<u>Transfer Facility</u>	<u>June 1990 - Present</u>	<u>Permitted Wastes</u>	<u>None</u>
9	<u>Used Oil Facility</u>	<u>June 1990 - Present</u>	<u>Used Oil</u>	<u>None</u>
10	<u>Satellite Accumulation Area</u>	<u>January 2001 - Present</u>	<u>Laboratory Waste</u>	<u>None</u>
11	<u>Parts Washer</u>	<u>July 2009 - Present</u>	<u>Parts Washer Solvent</u>	<u>None</u>
12	<u>Materials Processing Facility</u>	June 2006 - Present	<u>Non-Hazardous Solid Waste</u>	<u>None</u>
13	<u>Solid Waste Operations Area</u>	<u>July 2010 - Present</u>	<u>Non-Hazardous Solid Waste</u>	<u>None</u>
14	<u>Additional Retention Pond</u>	<u>July 2010 - Present</u>	<u>Stormwater</u>	<u>None</u>
15	<u>Universal Waste Lamp Storage Area</u>	February 2004 - Present	<u>Universal Waste Lamps</u>	<u>None</u>
16	<u>Universal Waste Battery Storage Area</u>	February 2004 - Present	<u>Universal Waste Batteries</u>	<u>None</u>

Solid Waste Management Units are shown on Figure 5.14.

# REPLACEMENT PAGES

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16. Site ownership status

- ☒ Owned ☐ To be purchased ☐ To be leased \_\_\_\_\_ years  
☐ Presently leased; the expiration date of the lease is \_\_\_\_/\_\_\_\_/\_\_\_\_.

If leased, indicate land owner's name \_\_\_\_\_

Address \_\_\_\_\_  
Street or P.O. Box city state zip

17. Name of engineer Robert Fox Registration No. 40980

Address 5909 Hampton Oaks Parkway Tampa FL 33610  
Street or P.O. Box city state zip

Associated with Environmental Resources Management

18. Is the facility located on Indian land? ☐ Yes ☒ No

19. Existing or pending environmental permits (attach a separate sheet if necessary)

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
Haz Waste Ops.	FDEP	34875-HO-009	06/15/2006	01/22/2011
Solid Waste Ops.	FDEP	34757-006-SO/30	11/18/2008	11/18/2013
Waste Transporter	FDEP	FLD981932494	08/01/2009	08/01/201
Used Oil	FDEP	FLD981932494	06/16/2009	06/30/2011

**B. Site Information**

- The facility is located in Hillsborough County.  
The nearest community to the facility is Tampa.  
Latitude 27,57 min., 45.07 sec. N. Longitude 82,22 min., 24.30 sec., W  
Method and datum Google Earth
- The area of the facility site is 4.46 (MOL) acres.
- Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Also show the hazardous wastes traffic pattern including estimated volume and control.

## Part Q. Information Requirements for Solid Waste Management Units

All Solid Waste Management Units are identified in the application on figure 5.14.

### **SWMU #1** (Concrete Container Storage Area (Enclosed Building) and Five (5) Sumps):

The concrete container storage area enclosed building is used to store and treat containers (primarily 55- gallon drums) of permitted hazardous and non-hazardous wastes. The container storage area is composed of three (3) separate containment bays having a total of five (5) collection sumps. Each collection sump has a capacity of 1,000 gallons. The collection sumps are seamless and made of pre-cast concrete coated with sealant. The floor is sloped at a grade of 1/8 inch per foot on all four sides to the collection sump. A similar floor design and collection sump exists in the flammable/combustible storage area. The maximum storage area and sump volumes capacities are 50,000 gallons and 5,000 gallons respectfully. The interior storage areas and sumps are visually inspected daily.

### **SWMU #2** (Loading/Unloading Dock):

The loading/unloading dock is a concrete surface to load and unload permitted hazardous and non-hazardous wastes. The loading area is covered by a roof and sloped towards the containment trench. The area also contains an epoxy coated improved containment area in front of Bay 2.

### **SWMU #3** (Retention Pond):

The retention pond has dimensions of 126 ft. by 35 ft. with an average volume of 0.1355 acre-feet and a slope of 3:1. The pond is used to retain stormwater runoff.

**SWMU #4** (Filter Press no longer in use):

The physical treatment of semi-solid wastes requiring filtration is performed on a batch basis. The solidification process utilizes a filter press having approximate dimensions of 2.6 ft. by 10.25 ft. by 3.6 ft. The filter press is manufactured of structural steel and pneumatically operated. There is no utilization of electrical components. The steel filter press was operated only once (test batch) utilizing non-hazardous waste.

**SWMU #5** (Municipal Waste Dumpster):

The steel municipal waste dumpster is located on the concrete loading/unloading area. The dumpster has an approximate capacity of 2.5 cubic yards and is used for municipal solid wastes until disposal pick-up.

**SWMU #6** (Stormwater Pre-Treatment Unit):

Stormwater from the truck loading/unloading area drains to a concrete trench drain which flows from north to south along the loading area. The trench drain flows to a 640-gallon concrete holding sump, which is equipped with a sump pump with a capacity of approximately 30 to 40 gallons per minute. The 5.0 amp, 380 watt, 1.6 horsepower sump pump pumps the stormwater from the holding tank through sand and carbon filters and then to the stormwater retention pond. The pump is set to keep the sump level to below 300 gallons. The carbon filter utilizes activated carbon to remove contaminants and has specifications which include 24 inch by 36 inch dimensions (diameter/height), 200 pounds of carbon, and a flow rate of twenty gallons per minute (gpm) at 2 ½ minute contact time. The sand filter is constructed of triple-wrapped fiberglass windings on a seamless water-tight polymeric inner shell with high-temperature, high-strength plastic internal components. The sand filter has specifications which include 24.5 inch by 37.5 inch dimensions, a flow rate of 20 gpm per square foot, and a 3.1 square foot filter area.

**SWMU #7 (Sanitary Sewer Drain field and Septic Tank):**

The Sanitary Sewer Drain field and Septic Tank is located in the Northwest corner of the Orient Road property. The system received sanitary sewage originating from the facility. The system is no longer in use.

**SWMU #8 (Transfer Facility)**

The Transfer Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #9 (Used Oil Facility)**

The Used Oil Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #10 (Satellite Accumulation Area)**

The Satellite Accumulation Area is located in the Laboratory on the 8<sup>th</sup> Avenue property. The material collected in the satellite accumulation area includes various types of debris associated with container sampling and the containerization of collected samples. Accumulated material is transferred to the Orient Road property for further processing and disposal.

**SWMU #11 (Parts Washer)**

The parts washer is located in the maintenance area on the 8<sup>th</sup> Avenue property. The washer consists of a metal sink fixed to a 30-gallon drum of part cleaning solution. The solution is pumped from the drum into the sink where the parts are washed and cleaned. The solution is drained back into the drum when the cleaning is completed. The solution is reused until it is no longer useful and at that point it is sent off-site for recycling.

**SWMU #12 (Material Processing Facility)**

The Materials Processing Facility is a 8,050 square foot building located on the 8<sup>th</sup> Avenue property. The building is used for processing, staging, storage and management of non-RCRA regulated solid waste. Processing includes segregation, decanting, filtration, transfer, shredding, or solidification. The storage capacity of the Materials Processing Facility is 185,650 gallons. The containment provided by the 8-inch high concrete curb and two 50-gallon sumps is 32,676 gallons which is sufficient to hold 110% of the largest container (a 7660 gallon constructed steel welded box used in the solidification process) or 10% of the total volume of the waste permitted to be stored in the building.

**SWMU #13 (Solid Waste Operations Area)**

The Solid Waste Operations Area is located on the 8<sup>th</sup> Avenue property and is used for the storage of roll-off boxes that are full of the solidified material created in the Materials Processing Facility. The roll-off boxes are staged in this area and are waiting for outbound transportation. The area consists of a 2,288 square foot covered concrete pad and has a capacity of 20,200 gallons. Since no liquids are stored in this area, there is a leachate collection system for secondary purposes.

**SWMU #14 (Additional Retention Pond)**

The additional Retention Pond is located on the 8<sup>th</sup> Avenue property and collects storm water from the roof of the Material Processing Facility. The retention pond was sized for both the permanent pool volume required and the 1" runoff storage (temporary pool).

**SWMU #15 (Universal Waste Lamp Storage Area)**

The Universal Waste Lamp Storage Area is located on the Orient Road property. The material is stored in a box van with a storage capacity of 1,104 cubic feet.

**SWMU #16 (Universal Waste Battery Storage Area)**

Universal Waste Battery Storage Area is located in the loading/unload dock 3C. This area is covered by a roof and sloped towards the containment trench.

<b>SWMU NO.</b>	<b>TYPE OF UNIT</b>	<b>YEARS OF OPERATION</b>	<b>WASTE MANAGED</b>	<b>EVIDENCE</b>
1	Container Storage Area / 5 sumps	June 1990 - Present	Permitted Wastes	None
2	Loading/Unloading Dock	June 1990 - Present	Permitted Wastes	None
3	Stormwater Retention Pond	June 1990 - Present	Stormwater	None
4	Filter Press	June 1990 - Present (currently not in use)	Non-Hazardous (one time test) batch	None
5	Municipal Waste Dumpster	June 1990 - Present	RCRA Empty Containers, Office Waste	None
6	Stormwater Carbon & Sand Filter	June 1990 - Present	Stormwater	None
7	Sanitary Sewer Drain field and Septic Tank	June 1990 - June 1995	Sanitary Sewage	None
8	Transfer Facility	June 1990 - Present	Permitted Wastes	None
9	Used Oil Facility	June 1990 - Present	Used Oil	None
10	Satellite Accumulation Area	January 2001 - Present	Laboratory Waste	None
11	Parts Washer	July 2009 - Present	Parts Washer Solvent	None
12	Material Processing Facility	June 2006 - Present	Non-Hazardous Solid Waste	None
13	Solid Waste Operations Area	July 2010 - Present	Non-Hazardous Solid Waste	None
14	Additional Retention Pond	July 2010 - Present	Stormwater	None
15	Universal Waste Lamp Storage Area	February 2004 - Present	Universal Waste Lamps	None
16	Universal Waste Battery Storage Area	February 2004 - Present	Universal Waste Batteries	None

## 2. GENERAL INFORMATION

### INTRODUCTION

#### General Information

This submittal is for the renewal of the existing Hazardous Waste Operating Permit for the EQ Florida, Inc. (EQFL), formerly known as US Liquids Inc., hazardous waste container storage and treatment facility. EQFL is a division of EQ Holding Company, a Michigan Corporation.

ID No.:	FLD 981 932 494
County:	Hillsborough
Address:	EQ Florida Inc. 2002 North Orient Road Tampa, Florida 33619 (813) 623-5302

There are no significant physical changes to the facility from the original permit to this renewal. The facility remains a 4.46 acre more or less, (MOL) site consisting of an office building with small laboratory; a 5,866 square foot (MOL) totally enclosed building utilized for the container storage and treatment of hazardous waste, and a vehicle loading/unloading area.

The facility operations remain essentially unchanged from the original permit. The operations remain container storage and treatment. There are no immediate plans for utilizing the press for treatment but the press may be utilized for treatment prior to the expiration of this permit should business, environmental regulations, or economics justify the treatment. The facility has operated as a container storage facility. Some re-packaging and blending of similar waste streams is performed at the facility. There is no on-site disposal.

The facility General Information, Inspection Plan, Contingency Plan, Procedures, Training Program, Waste Analysis Plan, Container Management, Closure Plan, and other

information have been updated and revised to reflect regulatory changes and more detailed and accurate conditions.

Non-RCRA regulated waste information does not apply to this permit and is for informational purposes only. These items are regulated under Subtitle D regulations, and RCRA Subtitle C regulations do not apply (by definition). The EQFL solid waste management facility is similar to transfer facilities of other solid waste facilities except it happens to be located at a permitted hazardous waste facility. EQFL is also a registered hazardous waste transporter with a state registered (on site) transfer facility. EQFL far exceeds the minimum regulatory requirements often typical of solid waste and transporter facilities. Examples of this include HSWA SWMU requirements, voluntary groundwater monitoring, on-site trained personnel and equipment to handle virtually any emergency, and more. Management of non-RCRA regulated waste does not interfere with management of RCRA regulated hazardous waste.

The EQFL facility had no solid waste activities prior to the existing permit. A Solid Waste Management Unit (SWMU) RCRA Facility Assessment (RFA) of the EQFL facility was initiated on February 15, 1993. There have been no releases to the environment of hazardous waste or hazardous waste constituents for any EQFL SWMU.

The EQFL facility hazardous waste capacity is 50,000 gallons; a maximum of 20,000 gallons in Bays 1 and 3, and a maximum of 10,000 gallons in Bay 2. The capacity is consistent with the physical limitations of the facility and is used throughout this application to determine containment, closure cost, financial assurances, and aisle space requirements. Actual day to day volume is usually less than 25,000 gallons. EQFL will utilize the container arrangement shown on Figure 5.12. The containers will normally be stored in a "single-stacked" arrangement. "Single-stacked" indicates that no forklift is necessary to load, unload, or move any container. Although the storage is referred to as "single stacked," small containers (such as 5-gallon pails) and aerosol 55 gallon drums will be manually stacked on top of the "single stacked" containers.

EQFL will occasionally utilize a double-stack container arrangement. The same storage arrangement (Figure 5.12) shown for single-stacking will be utilized for double-stacking with the exception that adjacent storage rows will not be utilized for container storage so that each row of double-stacked containers has access to an eight-foot aisle (if needed). The eight-foot aisle will allow turning radius access for a forklift to stack and unstack containers. Forklifts will not be utilized in the ignitable/reactive bay (Bay 2) unless they are Class I rated, explosion proof, or equivalent.

The sectioning between single and double stacked storage utilization will be by a containment sump basis. Specifically, the stacking requirements will apply to all containers utilizing the same containment sump. This would make it permissible to have the containers in Bay 1A double stacked and the containers in Bay 1B single stacked since Bay 1A utilizes different containment sumps from Bay 1B. If any containers are double stacked (other than small containers manually stacked on top of single-stacked containers) in the area contained by a common containment sump, then all containers in that area would have to meet the double stacked requirements. Small containers may be manually stacked on top of single stacked containers.

Waste management operations are described in detail to provide information that is current and accurate to actual conditions and practices. The facility remains essentially a transfer facility with container storage and no on-site disposal.

This permit renewal includes a section addressing air-permitting requirements. Calculations using conservative "worst case" data show the EQFL facility is far below applicable air permitting requirements.

### **Facility Layout and Operations**

The EQFL facility is a permitted hazardous waste storage and treatment facility. No on-site disposal occurs at the EQFL facility. EQFL manages non-RCRA regulated waste, household hazardous waste, used oil and filters, mercury containing lamps and devices, TSCA exempt and limited quantity exempt PCB and asbestos wastes, recyclable materials, and other similar substances, materials, and wastes. The primary waste management operations are storage and transfer.

The facility consists of the 4.46-acre (MOL) site. The permitted facility is located on the site is a 5,866 square foot (MOL) building, which was specifically designed for hazardous waste management. The container storage building is composed of three separate bays. The bays are separated by an eight-inch wide concrete block wall and fire doors. The wall extends from the floor to the roof and has been designed with a minimum fire resistance of four hours.

The total hazardous waste capacity within the building is 50,000 gallons when containers are double-stacked on pallets. The hazardous waste consists of solids, sludges, liquids, and lab packs.

The facility site plan (survey) at a scale of 1 inch to 20 feet is shown in Attachment 8.1. The facility consists of a 4.46-acre (MOL) site. The land was previously undeveloped. No previous solid waste management units (SWMUs) were located on this site. The SWMUs currently identified on site are described in the SWMU section. The surrounding land uses

## **CONSIDERATIONS UNDER FEDERAL LAW**

No other federal environmental laws apply to the EQFL facility.

### Facility Manager's or Designee's Judgement

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

### **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.

### **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. If a NELAC certified laboratory has provided sufficient results then waste codes may be removed from the sampled containers.

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 be NELAC certified. Data produced for use by DEP will use applicable DEP SOPs per the DEP Quality Assurance Rule, 62-160.210, .240, .300 & .320 F.A.C.

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.

## **ANALYTICAL PROCEDURES**

### **Mandatory Waste Analyses**

These are analytical procedures designated to identify or screen waste. They have been developed by EQFL based upon its operating experience as rapid but effective means for establishing key decision parameters pertinent to proper waste management.

1. Physical Description. Samples are inspected and the physical appearance of the waste is recorded Physical State (solid, semi-solid, liquid, etc.)
2. pH Screen. Full-range pH paper or a pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.
1. Water Mix Test. 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 H<sub>2</sub>O

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. 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) smokey (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.

#### **Additional Waste Analyses**

1. Specific Gravity. This test is performed to aid in determining if an acid or base may be concentrated or to determine the weight of the material.
2. Cyanide Screen. This screening test is performed using Cyantessmo (or equivalent) test paper according to the laboratory operating procedure.
3. Sulfide Screen. This screening test is performed using lead acetate test paper (or equivalent) according to the laboratory operating procedure.
4. Radiation Screen. 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.
5. Oxidizer Screen. 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).

Compatibility Test. Proportional amounts of material will be mixed in a container. The mixture will be evaluated by observing physical and chemical changes which 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.

### **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 a 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 17.5.

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.

## EQ Florida Inc. – Facility Inspection Log

Date: \_\_\_\_\_

Inspector: \_\_\_\_\_

Time: \_\_\_\_\_

Approved By: \_\_\_\_\_

		<u>SATISFACTORY</u>	<u>UNSATISFACTORY</u>
1.	Containers:		
1.1	Condition, Closure, and Compatibility	_____	_____
1.2	No Leaks	_____	_____
1.3	Proper Labeling	_____	_____
1.4	Aisle Space & Housekeeping	_____	_____
1.5	Proper Storage Location	_____	_____
1.6	Over 1 year Accumulation start date	_____	_____
	Drum Numbers (if applicable);	_____	_____
2.	Vehicle Unloading Area:	_____	_____
3.	Transfer Facility Vehicles and Wastes:	_____	_____
4.	Empty Container Storage:	_____	_____
5.	Stormwater System:		
5.1	Trenches	_____	_____
5.2	Sump and Filter System	_____	_____
5.3	Retention Pond	_____	_____
5.4	Lock Out Box Installed	_____	_____
6.	Containment Areas and Sumps (cracks, leaks etc.)	_____	_____
7.	Safety Equipment:		
7.1	Fire Extinguisher	_____	_____
7.2	Telephones & Air Horns	_____	_____
7.3	Safety Shower & Eye Wash	_____	_____
7.4	Acid, Caustic, Solvent, and Mercury Spill Kits	_____	_____
7.5	Emergency Exits (including flammable bay)	_____	_____
7.6	Safety Supply Lockers	_____	_____
7.7	Fire Suppression System	_____	_____
7.8	LEL Meter and Sensors	_____	_____
8.	Miscellaneous Unit		
8.1	Filter Press	_____	_____
9.	Waste Inventory:	<u>55-Gallon Containers</u>	<u>5-Gallon Containers</u>
			<u>Total Gallons</u>
	Bay 1    ORM	_____	_____
	Bay 1    Acids	_____	_____
	Bay 2    Flammables	_____	_____
	Bay 2    Flammable Solids	_____	_____
	Bay 2    Reactives	_____	_____
	Bay 2    Aerosols	_____	_____
	Bay 3    Oxidizers	_____	_____
	Bay 3    Alkalines	_____	_____
	Bay 3    Poisons	_____	_____
	Bay 3    Non-Regs	_____	_____
	Bulk Shipments	_____	_____

TOTAL HAZARDOUS WASTE \_\_\_\_\_ Gallons

10. Additional information for unsatisfactory items: \_\_\_\_\_

11. Remedial actions necessary for unsatisfactory items: \_\_\_\_\_

## **EQFL 24- (or 40-) Hour Training**

### **As Required by 29 CFR 1910.120**

#### **COURSE OUTLINE**

Regulatory Review 29 CFR 1910.120

Toxicology

Principles of Hazardous Materials

Right-To-Know (HAZ-COM)

Personnel Protective Equipment (PPE)

Respiratory Protection

Contingency Plan Implementation

Spill Clean-up Drill

Decontamination

Manifests, Profiles, Labels, & Land Bans

DOT Labeling, Placarding, & Shipping

On-The-Job Training

Site Control/ Site Safety & Health Plan

Emergency Response

Hazardous Waste Operations

Fire fighting Procedures

Emergency First Aid / CPR

**EQFL 8-Hour Refresher**  
**As Required by 29 CFR 1910.120**

**COURSE OUTLINE**

- ☐ Contingency Plan Implementation
- ☐ Mock Chemical Spill Drill
- ☐ SCBA and Air Line
- ☐ Cartridge Respirator
- ☐ Respirator Fit Test
- ☐ PPE (Vendors)
- ☐ Florida Right-To-Know
- ☐ Manifests, Profiles, Labels, & Land Bans
- ☐ DOT Labeling, Placarding, & Shipping
- ☐ On-The-Job Training
- ☐ Safety Meetings
- ☐ Emergency Response
- ☐ Hazardous Waste Operations
- ☐ Fire fighting Procedures
- ☐ Emergency First Aid / CPR

## **7. PREPAREDNESS AND PREVENTION**

### **DESIGN AND OPERATION OF FACILITY**

The EQFL facility was specially designed and built for hazardous waste storage, transfer, and treatment. The facility consists of a 4.46 acre (MOL) site with a loading/unloading area, office building, and 5,866 square foot (MOL) storage building. The facility Site Plan, storage building, and survey are shown on Attachments 8.1 and 8.2.

The office building does not conduct commercial hazardous waste storage, transfer, or treatment. The EQFL quality control laboratory is located in the office building. The lab generates small quantities (5 gallons or less) of satellite accumulation wastes, which are taken to the hazardous waste storage building for storage prior to shipment to an off-site permitted disposal facility.

The loading/unloading area is used for the loading, unloading, and permitted 10-day transfer storage of hazardous waste. Transport vehicles delivering shipments of hazardous waste back into any one of seven available loading/unloading docks. The docks have roll-up doors, which allow unloading directly from transport vehicle to the waste storage building. Outbound waste shipments are loaded in a similar manner. The loading and unloading areas are shown on Attachment 5.13. Loading, unloading, and transfer facility operations are described in more detail in Section 14 of this permit application.

The waste is loaded directly from the storage building to the transport vehicle. The loading/unloading area is an impervious contained surface constructed of concrete and asphalt. There is a ten-foot roof overhang from the storage building over the loading/unloading area. All stormwater run-offs from the loading/unloading area can be contained and inspected prior to release to the stormwater management system. The stormwater system is shown on Attachment 5.15 and described in more detail in the Section 14 of this permit application. Surface water flow is shown on Attachment 5.11.

## 8. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

### GENERAL INFORMATION

#### Introduction

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

2002 N. Orient Road  
Tampa, Florida 33619  
FLD 981 932 494

The facility consists of a 4.46 acres (M.O.L.) site. 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, safety and fire alarms and equipment. The equipment and systems are described in other sections of this Plan. A site layout is included in Attachment 8.1.

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. A lower explosion limit (LEL) system is located in the flammable area. An automatic ventilation system is activated at 20% of the LEL. The automatic foam fire suppression system, fire alarm, and monitoring service emergency call to the Tampa Fire Department are activated at 30% of the LEL.

Fire extinguishers and fire hoses are located throughout the facility. Safety equipment, proximity suits, SCBA and material handling equipment are located at the site. Emergency safety equipment is listed in Attachment 15 and shown on Attachment 8.2. 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.

In the event of a power outage, emergency backup lighting is provided in the facility, and the ADT security system will activate its backup battery.

In order to prevent releases to the atmosphere, containers will remain closed at all times except when it is necessary to add or remove waste from the container.

All operations personnel at this site are trained in emergency response, hazardous waste operations, fire fighting procedures, emergency first aid, and CPR.

### **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, floods, hurricanes or an unplanned sudden and non-sudden release into the environment of hazardous waste including liquids, vapors and particulates which could cause harm to human health or the environment.

**EQ Florida, Inc. Contingency Plan**  
**Emergency Response Coordinators:**

	<b>Coordinator</b>	<b>Primary Alternate</b>	<b>Secondary Alternate</b>
<b>Name</b>	Robert Mulholland	Stuart Stapleton	Larry Sinatra
<b>Address</b>	1417 Butch Cassidy Tr.	619 Cedar Grove Dr.	6812 N. River Blvd.
<b>City, State, &amp; Zip</b>	Wimama, FL 33598	Brandon, FL 33511	Tampa, FL 33604
<b>Work Phone #</b>	813-319-3410	813-319-3423	813-319-3418
<b>Home Phone #</b>	813-642-8347	813-412-2302	N/A
<b>Mobile #</b>	813-205-4327	813-770-9954	813-598-0514

At all times, there will be at least one employee either at the facility 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 facility operations, the location and characteristic of wastes managed, the location of facility records, and the facility layout. The EQ Emergency Response Coordinator and Alternates have the authority to commit the resources needed to carry out the EQ Contingency Plan.

All emergency Coordinators and Alternates have authority to commit corporate funds 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.

EPA Region IV	Any evacuation, traffic or security issue	404-562-8705(24hr) 404-562-8700
City of Tampa – Storm water	If potential for contamination	813-259-1693 813-622-1901
Clark Environmental	If additional Resources are needed	863-425-4884

## EMERGENCY EQUIPMENT AND COMMUNICATIONS SYSTEMS

This chapter describes the emergency equipment and alarm systems at the EQ facility. This equipment is listed in Attachment 15.

### Emergency Equipment

1. **Fire extinguishers** are located throughout the building and prominently identified by signs and red markings. ABC extinguishers are located in Bays 1 and 3. Halon and metal-x extinguishers are located in the flammable storage area (Bay 2).
2. **Chemical Spill Treatment Kit** containing 6 2-pound containers of Spill-X-S (100% carbon) used for solvent spills is located in Bay 2.
3. **Oil-Dri** and **Vermiculite** are used for solvent and oil spills. Located on the ramp leading to Bay 3 in bags identified with the words Oil-Dri or Vermiculite.
4. **Soda Ash** is used to neutralize acids. Located in Bay 1 in bags identified by the words Soda Ash.
5. **Caustic Spill Treatment Kit** containing 6 2-pound containers of Spill-X-C (75% Citric Acid) used for caustic spills is located in Bay 3.
6. **Spill control/sorbent booms/pads** used to contain any spill. Spill control booms are available in various lengths and are located in Bay 3.
7. **Protective Clothing** including PVC suits and polyethylene splash suits are located in Bays 1 and 3. 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**, located in Bays 1 and 3, and **SCBA**, located in Bay 3, are available for respiratory protection.
9. **Gloves, boots, face shields, goggles** and **hard hats** may be used as protective

equipment and are located in Bays 1 and 3.

10. **Acid Spill Treatment Kit** containing 6-2 pond containers of Spill-X-A (78% Magnesium Oxide) used for acid spills is located in Bay 1.
11. **Air powered pumps with hose** for removal of liquids or water. Identified by lack of electrical connection and are capable of fitting inside of a drum bung are located in Bays 1 and 3.
12. **Manual pump** for removal of any flammable liquids.
13. **Shovels, brooms, buckets, mops, tools, bung wrenches**, etc. are located in Bays 1, 2 and 3
14. **Telephones** located on the north and south walls of the main storage area and in the office area.
15. Empty **DOT-approved containers** for recontainerizing damaged or leaking containers are located in Bays 1 and 3.
16. Empty **85 and 110 gallon overpack drums** for recontainerizing damaged or leaking containers are located in on the ramp leading to Bay 3.
17. An **emergency eye wash/shower** is located in both Bays 1 and 3.
18. **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.

Additional empty DOT approved drums are located in materials storage trailers. The fire extinguishers are on the walls and identified by red markings and the sign "Fire Extinguisher".

Mailing List

Assistant Fire Marshall Brown Tampa Fire Department 808 East Zack Street Tampa, FL 33602	Chief Houge Tampa Police Department 411 North Franklin Street Tampa, FL 33602
David Park Brandon Regional Hospital 119 Oakfield Drive Brandon, FL 33511	Tony Venezia Tampa General Hospital P.O. Box 1289 Tampa, FL 33601-1289
Tony Payne SWS First Response 901 McClosky Blvd. Tampa, FL 33605	Jim Clark Clark Environmental, Inc. 755 Prairie Industrial Parkway Mulberry, FL 33860
Bill Lofgren Tampa Bay Regional Planning Council 4000 Gateway Centre Blvd. Suite 100 Pinellas park, FL 33782	Merlin D. Russell Jr. Florida DEP Division of Waste Management 2600 Blair Stone Road M.S. 4560 Tallahassee, FL 32399-2400
Jim Dregne Florida DEP Southwest Division Division of Waste Management 13051 North Telecom Parkway Temple Terrace, FL 33637	United States Coast Guard ATTN: Facilities 155 Columbia Drive Tampa, FL 33606

## **9. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING**

### **REQUIRED NOTICES**

Generators will be notified in writing that EQFL has the appropriate permit for, and will accept, the waste the generator is shipping. Copies of this written notice are kept as part of the operating record. Copies of the EQFL permit are available for review. EQFL does not receive hazardous waste directly from a foreign source. The Regional Administrator will be notified in writing at least 2 (two) weeks in advance of the date the waste is expected to arrive at the facility if EQFL arranges to receive hazardous waste from a foreign source.

The EQFL owner or operator will notify any new owner or operator in writing of the required notices of 40 CFR Parts 264.12 and 270 before transferring ownership or operation of the EQFL facility during its operating life. There are currently no plans to transfer ownership or operation of the EQFL facility.

### **USE OF MANIFEST SYSTEM**

All hazardous wastes entering and leaving the EQFL facility will be accompanied by a Uniform Hazardous Waste Manifest. All manifested hazardous waste shipments will be accompanied by Land Disposal Restrictions certifications. For inbound (receiving) waste shipments, the EQFL facility owner, operator, or agent will:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest is received;

release of hazardous waste or hazardous waste constituents. The EQFL SWMUs are identified on the map included as Attachment 5.14. Photographs of the SWMUs are included as Attachment 6.3. The filter press is not currently in use.

The following information describes the waste generation and activity at the identified SWMUs:

**SWMU #1 (Concrete Container Storage Area (Enclosed Building) and Five (5) Sumps):**

The concrete container storage area enclosed building is used to store and treat containers (primarily 55- gallon drums) of permitted hazardous and non-hazardous wastes. The container storage area is composed of three (3) separate containment bays having a total of five (5) collection sumps. Each collection sump has a capacity of 1,000 gallons. The collection sumps are seamless and made of pre-cast concrete coated with sealant. The floor is sloped at a grade of 1/8 inch per foot on all four sides to the collection sump. A similar floor design and collection sump exists in the flammable/combustible storage area. The maximum storage area and sump volumes capacities are 50,000 gallons and 5,000 gallons respectfully. The interior storage areas and sumps are visually inspected daily.

**SWMU #2 (Loading/Unloading Dock):**

The loading/unloading dock is a concrete surface to load and unload permitted hazardous and non-hazardous wastes. The loading area is covered by a roof and sloped towards the containment trench. The area also contains an epoxy coated improved containment area in front of Bay 2.

tight polymeric inner shell with high-temperature, high-strength plastic internal components. The sand filter has specifications which include 24.5 inch by 37.5 inch dimensions, a flow rate of 20 gpm per square foot, and a 3.1 square foot filter area.

**SWMU #7** (Sanitary Sewer Drain field and Septic Tank):

The Sanitary Sewer Drain field and Septic Tank is located in the Northwest corner of the Orient Road property. The system received sanitary sewage originating from the facility. The system is no longer in use.

**SWMU #8** (Transfer Facility)

The Transfer Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #9** (Used Oil Facility)

The Used Oil Facility is located in, and part of, the Concrete Container Storage Area (SWM#1) and is discussed above.

**SWMU #10** (Satellite Accumulation Area)

The Satellite Accumulation Area is located in the Laboratory on the 8<sup>th</sup> Avenue property. The material collected in the satellite accumulation area includes various types of debris associated with container sampling and the containerization of collected samples. Accumulated material is transferred to the Orient Road property for further processing and disposal.

**SWMU #11** (Parts Washer)

The parts washer is located in the maintenance area on the 8<sup>th</sup> Avenue property. The washer consists of a metal sink fixed to a 30-gallon drum of part cleaning solution. The solution is pumped from the drum into the sink where the parts are washed and cleaned. The solution is drained back into the drum when the cleaning is completed. The solution is reused until it is no

longer useful and at that point it is sent off-site for recycling.

**SWMU #12 (Material Processing Facility)**

The Materials Processing Facility is a 8,050 square foot building located on the 8<sup>th</sup> Avenue property. The building is used for processing, staging, storage and management of non-RCRA regulated solid waste. Processing includes segregation, decanting, filtration, transfer, shredding, or solidification. The storage capacity of the Materials Processing Facility is 185,650 gallons. The containment provided by the 8-inch high concrete curb and two 50-gallon sumps is 32,676 gallons which is sufficient to hold 110% of the largest container (a 7660 gallon constructed steel welded box used in the solidification process) or 10% of the total volume of the waste permitted to be stored in the building.

**SWMU #13 (Solid Waste Operations Area)**

The Solid Waste Operations Area is located on the 8<sup>th</sup> Avenue property and is used for the storage of roll-off boxes that are full of the solidified material created in the Materials Processing Facility. The roll-off boxes are staged in this area and are waiting for outbound transportation. The area consists of a 2,288 square foot covered concrete pad and has a capacity of 20,200 gallons. Since no liquids are stored in this area, there is a leachate collection system for secondary purposes.

**SWMU #14 (Additional Retention Pond)**

The additional Retention Pond is located on the 8<sup>th</sup> Avenue property and collects storm water from the roof of the Material Processing Facility. The retention pond was sized for both the permanent pool volume required and the 1" runoff storage (temporary pool).

**SWMU #15 (Universal Waste Lamp Storage Area)**

The Universal Waste Lamp Storage Area is located on the Orient Road property. The material is stored in a box van with a storage capacity of 1,104 cubic feet.

**SWMU #16 (Universal Waste Battery Storage Area)**

Universal Waste Battery Storage Area is located in the loading/unload dock 3C. This area is covered by a roof and sloped towards the containment trench.

The EQFL facility is located in a heavily industrialized area (Orient Park) in Tampa, Florida. The previous use of the EQFL property was residential (one residence) and vacant land. There is significant documented groundwater contamination in the Orient Park area. Two NPL (Superfund) sites adjacent to the EQFL facility are being investigated and remediated under the direction of the EPA. There are also several other sites or former sites potentially contributing to the documented Orient Park groundwater contamination.

EQFL voluntarily monitors the groundwater from its property for liability protection. The EQFL voluntary groundwater monitoring wells are identified on Attachment 8.1, the facility record drawing (site plan and survey). The wells are sampled and analyzed, at minimum, annually. The selection of constituents to analyze for is dynamic and depends on the results of previous analyses and on the results of analyses from other facilities in the area (particularly the National Priorities List sites). Copies of previous analytical results are on file with the DEP. Several regulated compounds have been detected by the EQFL groundwater monitoring program. All hazardous waste stored at EQFL is in a specially designed totally enclosed storage building with over 5,000 gallons of secondary containment. There have been no releases of hazardous waste to the environment at the EQFL facility. There is no statistical correlation between downgradient and upgradient analytical results to confirm contribution to any groundwater contamination by EQFL. It is the belief of EQFL that any elevated levels of regulated compounds detected in the groundwater at the EQFL property is either background or the result of off-site migration

from other sites. This is supported by the previously stated information.

The requirements of 40 CFR 264 Subpart F (Releases From Solid Waste Management Units) do not apply to the EQFL facility. There have been no releases from any SWMU at the EQFL facility. EQFL will comply with the EPA and FDEP requirements of the Final RFA Report.

## 43 TC wastes

Disposal is off-site via stabilization and landfill.

### **CLOSURE PERFORMANCE STANDARDS**

EQFL plans to continue operating the EQFL permitted facility as long as it is a viable business activity, both economically and environmentally. There are currently no plans to stop waste management activities or close the facility. This Closure Plan is submitted to plan, prepare, and secure financial assurances so that closure can be completed when necessary.

Closure of the EQFL facility will be done in a manner that minimizes the need for further care. All hazardous waste and hazardous waste constituents will be properly managed at closure so that post closure care and post closure potential for releases of hazardous waste or hazardous waste constituents are eliminated. The EQFL Closure Plan complies with the requirements of 40 CFR 264 Subpart G. It is the intent of this plan to protect human health and the environment from any release of hazardous materials or constituents.

Closure and the closure cost estimate is based upon a third party completely managing and conducting all closure activities.

### **FINAL CLOSURE ACTIVITIES**

Final closure activities will include the removal of all hazardous waste and hazardous waste constituents from the facility for shipment to permitted treatment and disposal facilities. Final closure also includes the decontamination of all equipment, the floors inside of the waste management building, the containment sumps, the inside walls of the building (three feet up), and the loading/unloading areas (the paved area from the building to five feet out and the outside of the warehouse dock wall from the ground up to the floor level).

or hazardous waste constituents were to occur by the facility, the most likely path of migration would be the stormwater system. The inclusion of two additional soil samples allows an upgradient sample from the northeast corner of the facility and a downgradient sample from the southeast corner of the facility to be investigated beyond the stormwater retention area. A soil sample from under the building will also be taken. Additional soil samples will be taken in any area with visual evidence of contamination. Soil samples will also be taken under buildings or in sumps if there are visible cracks or indications that contamination could have migrated into soils and/or groundwater.

All process equipment will be cleaned with water, solvent or both and the resultant liquid sent to a permitted hazardous waste treatment/disposal facility. The floors and sumps will then be decontaminated by steam cleaning. The facility warehouse inner walls will be decontaminated three feet up from the floor. The loading/unloading area will be decontaminated. The loading/unloading area to be decontaminated includes the dock exterior wall from the ground up to the warehouse floor level and the paved ground from the building to out five feet. This liquid will be analyzed for organic solvents and TCLP constituents to determine its acceptability for disposal.

All decontamination will be done and certified by outside contractors. Samples of rinse waters will be taken and analyzed to confirm all washed areas as sufficiently decontaminated.

It is estimated that no more than four weeks will be required to fully decontaminate all equipment and the storage facility itself.

#### Closure Certification

Closure certification (as well as all other closure activities) will be conducted by an independent third party.

An independent registered professional engineer licensed within the State of Florida will

certify closure of the EQFL hazardous waste facility. It is anticipated that three on-site inspections by the registered professional engineer will occur during the closure period. Those inspections are indicated below:

First Inspection:            Final date of waste acceptance

Second Inspection:        Upon completion of all removal for off-site disposal

Third Inspection:          Upon completion of all decontamination

It is the intent of these inspections to ensure that all materials are being handled in accordance with our Closure Plan. Upon completion of the final inspection by the registered professional engineer, a certification that closure has been completed will be submitted to the Regional Administrator and Florida DEP. This certification will be sent within 60 days of completion of closure by registered mail.

## **CERTIFICATE OF CLOSURE**

Prior to the implementation of the closure plan, EQFL will meet with FDEP to discuss the details of the closure plan. Based upon new regulations and/or guidance or policy issues, the plan may need to be amended and/or updated prior to its implementation.

Within 60 days of the closure of each hazardous waste unit and within 60 days of the final closure of the facility, EQFL will submit to the FDEP, by registered mail, a certification that the facility has been closed in accordance with the EQFL Closure Plan. The certification will be signed by the owner or operator and by an independent registered professional engineer. Documentation supporting the closure certification will be included in this submittal.

The EQFL facility has no disposal units. Therefore, no survey or post closure care is required.

The EQFL Closure Plan will be amended as per the requirements of 40 CFR 264 Subpart G if amendments are necessary.

applicable) will be unloaded within five (5) consecutive calendar days (excluding holidays) of arrival at the facility. Bulk hazardous waste shipments manifested to EQFL will be shipped off-site upon approval from the final disposal facility for acceptance and scheduling of waste. EQFL will notify the DEP if any unforeseen problems require exceeding the original 24 hours.

### **Processing Areas**

Inbound waste shipments may be unloaded into the warehouse to a temporary processing area for obtaining samples and waste verification. The temporary processing area will have separate containment by utilizing a temporary dike, boom or berm. Inbound waste will be stored in the temporary processing area for a maximum of three operating days. All applicable requirements such as inspections and operating record will apply to these wastes. The processing area will be designated with a sign.

Temporary processing areas have been identified on Attachment 5.12. The areas are normally utilized as permitted hazardous waste storage and processing areas. A temporary berm or containment will be utilized to designate and contain the temporary processing area when in use. A sign designating "Temporary Processing Area" and "Temporary Processing Start Date \_\_\_\_\_" will also be utilized for each temporary processing area. The temporary processing area, temporary berm or containment will contain the volume of the largest container or 10% of all containers in the temporary area (whichever is greater).

Hazardous waste designated for outbound shipments may be moved to a temporary processing area. Outbound compatible hazardous wastes in their designated storage bay will be stored a maximum of 10 days in the temporary processing area. Outbound hazardous wastes managed in the temporary processing areas will be limited to five (5) operating days maximum if the wastes are incompatible or are not in their designated storage bay. All applicable requirements such as inspections and operating records will apply to these hazardous wastes.

### **Transfer Facility**

EQFL plans to continue utilization of the transfer facility. The transfer facility, fully identified in this permit submittal, is incorporated in the EQFL Contingency Plan, is incorporated into the EQFL Closure Plan, and exceeds all applicable requirements. Transfer facility waste shipments will not include shipments to EQFL (designated facility) or from EQFL (generator). Transfer facility waste shipments will be noted in a separate Transfer Log (operating record).

### **Outbound Shipments**

Outbound shipments of hazardous waste may be loaded to bulk containers (roll-off box or tanker). Outbound roll-off shipments will be loaded by emptying containers into the roll-off container. Containers are emptied utilizing a forklift with a container handling attachment. Outbound tanker shipments are loaded by pumping the container directly to the tanker utilizing the tanker pump (or a portable pump).

Outbound hazardous waste vehicles back directly to the facility warehouse (in the loading/unloading area shown on Attachment 5.13). Hazardous waste containers are loaded to outbound vehicles directly from the warehouse. Container loading is usually done manually utilizing a "drum truck" (dolly). A forklift may be utilized for loading, but will not be utilized in Bay 2, the flammable storage bay. The waste is physically removed from the warehouse and placed into the transport vehicle. Outbound hazardous waste paperwork is reviewed for completeness, accuracy, quantities, and piece count.

The loading of outbound hazardous waste container shipments will be completed within thirty (30) consecutive workdays of initiating the loading of the outbound shipment. All hazardous waste outbound shipment load quantities will continue to be inspected daily and counted towards the total facility capacity until the outbound shipment has departed from the facility. The EQFL operating record will document the loading operations of hazardous waste.

## **HAZARDOUS WASTE RECEIVING, UNLOADING, LOADING, AND OUTBOUND SHIPMENT SUMMARY**

### **Inbound Transportation**

Hazardous waste container shipment manifests will be signed within 24 hours of arrival at the facility or prior to the transporter leaving the facility, whichever is sooner.

### **Bulk Inbound Shipments**

Hazardous waste bulk shipments are received, managed, and will depart from the facility upon approval from the final disposal facility for disposal and scheduling of waste. All hazardous waste bulk inbound shipment load quantities will be counted towards the total facility capacity until the bulk inbound shipment has departed from the facility.

### **Unloading**

Hazardous waste container shipments will be unloaded within five (5) consecutive calendar days (excluding holidays) of arrival at the facility.

### **Loading and Outbound Shipments**

The loading and outbound shipment of hazardous waste loads will be completed within thirty (30) consecutive working days of initiation of the loading of the outbound shipment

### **Waste Receipt, Sampling, and QC Analysis**

Waste receipt, sampling, and QC analysis procedures are described in the EQFL Waste Analysis Plan.

### **Waste Storage**

All applicable requirements for waste storage are described in the appropriate section of this permit.

## **Waste Treatment**

Waste treatment (solidification) is described in the Miscellaneous Unit section of this permit.

## **Waste Recontainerization or Consolidation**

Some of the waste received will be recontainerized. In general, recontainerization includes consolidation of like waste into similar size or larger containers. Other recontainerization operations will include paint can processing, aerosol can recycling, empty container and or rag compacting, loading to roll-offs, and loading to tanker truck. All waste transfer and recontainerization is conducted utilizing best management practices.

Hazardous wastes will have already been profiled and approved as described in the EQFL Waste Analysis Plan prior to recontainerization. In addition, each hazardous waste stream will also have been sampled and quality control verified as described in the EQFL Waste Analysis Plan. Only compatible wastes are transferred or recontainerized in each batch operation. The same waste management practices for inspections, contingency, preparedness and prevention, training, precautions for ignitable, reactive, and incompatible wastes, waste analysis, recordkeeping, and container management that apply for treatment and storage will also apply for hazardous waste transfer and recontainerization.

Additional precautions will be taken when bulk (roll-offs, sludge boxes, and tankers) recontainerization occurs. The loading/unloading area will be inspected prior to the recontainerization. The EQFL stormwater system will be shut off. Additional precautions such as the use of plastic sheeting, pads, and booms will be utilized if necessary to contain possible drippage. Roll-offs will be utilized for solid material, sludge boxes will be utilized for sludges, and tankers will be utilized for liquids. A liner will be utilized for roll-offs. Containers will be dumped into the top of the roll-off. The roll-off will be covered by a lid or tarp when loading is complete. Containers will be dumped or pumped through the top opening of the sludge box. The box will be closed and sealed when loading is complete. Containers will be pumped directly to tankers. Special care will be taken to prevent drippage from hoses or fittings. The tanker will be closed and sealed when loading is

complete. The loading/unloading area will be inspected after each loading operation. Any drippage or residue will be cleaned up. If drippage occurs, it will be contained by disposable plastic sheeting and/or absorbent materials. Disposable items containing waste residues will be managed appropriately as solid or hazardous waste. The stormwater system will be turned back on only when any material processing has been stopped and inspection verifies that the area has been properly cleaned if necessary.

### **Universal Waste**

The facility receives Universal Waste including batteries and mercury-containing lamps such as fluorescent lamps. Once received, the lamps and batteries are placed in storage. Universal Waste batteries are stored on the loading/unloading area 3C as illustrated on figure 5.13. The storage location for the Universal Waste Lamps is also illustrated on figure 5.13.

### **Paint Can Processing**

The facility receives water-based latex and solvent-based paint in cans for recontainerization and disposal. The majority of the paint received is from household waste. This operation includes manually pouring the paint to a container or processing the paint cans through the processing unit which crushes the cans, separating the paint from the emptied container. Equipment specifications of the paint can processor are included as Attachment 16.3.

EQFL will use best management practices when operating the unit. Practices include using plastic sheeting to contain any drippage. Each hazardous waste stream processed by the unit will have had waste analysis completed as described in the Waste Analysis Plan.

### **Aerosol Can Recycle**

The aerosol can recycler is a machine which crushes aerosol cans while simultaneously capturing all liquids into a 55 gallon drum. The aerosol can is placed within an enclosed unit and is punctured. The material within the can is ejected into the drum. A filter unit is attached to the machine to capture any vapors expelled from the drum/can during the

recycling operation. This operation will take place within the paint can crushing operations located in area 2A as illustrated on figure 5.13. Equipment specifications of the aerosol can recycling unit are included as Attachment 16.2.

The filters or filter media will be changed out as per the manufacturer's specifications (or equivalent). Spent filters will be managed as solid or hazardous waste (based upon waste determination). Filter specifications for the aerosol recycling unit suggest using approximately ½ pound of activated carbon per 1,200 aerosols.

### **Empty Container and Rag Compacting**

The drum crusher and rag compactor will consist of a closed cabinet unit located inside the storage building. A drum is placed inside the unit and a ram is used to crush the drum. The unit contains a grate and collection pan at the bottom to catch any liquid or solid residue material from the crushed drum. The material is drummed as waste.

The rag compactor works in a similar manner in that a drum of waste rags is placed inside the unit. A ram which is slightly smaller than the drum opening is used to compact the rags inside the drum. Equipment specifications of the drum compactor are included as Attachment 16.1.

### **EMPTY CONTAINER MANAGEMENT**

Empty containers and/or inner liners removed from empty containers which meet the requirements of 40 CFR 261.7 will be managed as RCRA Empty. Empty containers and/or liners that have held an acute hazardous waste listed in 40 CFR 261.31, 231.32, 261.33(e) will be managed as Acute Empty. Containers and/or liners which do not meet the requirements of RCRA Empty will be managed as Non-Empty Containers.

### **RCRA Empty**

RCRA Empty containers smaller than 55 gallons will be recycled or managed as non-RCRA regulated solid waste. RCRA Empty containers 55 gallons and larger will be recycled, returned to reconditioners, or managed as non-RCRA regulated solid waste.

RCRA-Empty containers will be accumulated on an empty trailer, and/or at the truck loading/unloading area. The empty containers will be sent off-site for recycling, reconditioning, and/or disposal when sufficient quantity is available (usually a truckload). The empty container storage area will be inspected as per the inspection plan. Empty containers may be crushed and/or compacted on site.

#### **Acute Empty**

Acute empty containers will be triple rinsed or managed as hazardous waste. Containers that are triple rinsed will be thoroughly rinsed using an appropriate solvent a minimum of three (3) times. The container will be fully emptied into a container, typically a 55-gallon drum or 5-gallon bucket following each rinse. The collected rinse solvent will be managed as hazardous waste. The rinsing will occur within the warehouse above the impervious floor.

#### **Non-Empty**

Non-Empty containers will be managed as per the requirements for the material within the container.

#### **Unknown Waste Handling Procedure**

EQFL is currently authorized to store any RCRA hazardous waste under the special provisions detailed in Specific Condition Part I, Item 3, and Part V, Item 2 of the existing permit. (i.e., unknown waste received during emergency clean-up activities) The unknown waste referred to are actually not totally unknown. The "unknown wastes" in all cases have been sufficiently characterized (by Hazcat Kit, laboratory quality control, or similar means) to determine the waste compatibility and hazard class. This information will be sufficient for DOT approved shipping and handling of the waste, but may not be sufficient to fully manage the waste per 40 CFR Part 268 (Land Disposal Restrictions) until further information is received. EQFL will utilize the following procedure for the management of "not fully characterized" (i.e., unknown) wastes.

1. EQFL (or other approved) personnel will sample the container of waste following DEP SOP 5000 (Waste Sampling) and/or other "procedures and guidelines" mentioned in this paragraph procedures and guidelines for approaching and sampling unknown waste:
2. Field screening tests for color, density, physical state, pH, ignitability, oxidizer potential, solubility, and water reactivity will be performed to characterize the compatibility and hazard class of the waste.
3. The waste will be labeled and manifested for transport to the EQFL facility. Shipping name will be determined by the field characterization and, at minimum, will be Hazardous Waste Solid (or Liquid), Not Otherwise Specified (NOS). The legend "Pending Analysis" will be written on the container (or label) and manifest.
4. Any "not fully characterized" (unknown) waste received by the EQFL facility will be segregated from all other hazardous wastes until the wastes are identified and waste compatibility is determined. This is an extra precautionary measure since waste compatibility will have been field determined prior to receipt. The segregated area utilized for these wastes will have a separate containment system not contiguous with the containment systems provided for the known wastes. EQFL utilizes containment pallets for separate containment.
5. Each container of "not fully characterized" (unknown) waste will be sampled and analyzed following the procedures specified in the EQFL Waste Analysis Plan.
6. Once the waste is fully characterized, the waste will be moved to the appropriate storage location and scheduled for treatment or shipment to an off-site disposal facility.
7. EQFL will notify the Department detailing waste type and quantity if characterization of the waste indicates the waste is not authorized by the EQFL permit. The waste will be removed within 10 working days to a permitted treatment, storage, disposal facility if it is not authorized by the EQFL permit.

## **EQFL TRANSFER FACILITY OPERATING RECORD PROCEDURE**

EQFL is also a registered hazardous waste transporter with a state registered (on site) transfer facility. EQFL exceeds all applicable regulations for transporter transfer facility operations. The EQFL transporter transfer facility is similar to transfer facilities of other transporters except it happens to be located at a permitted facility. EQFL exceeds the minimum regulatory requirements for transfer facilities.

The EQFL Transfer Facility operating record will track shipments of hazardous waste by EQFL (as transporter), where EQFL is not the generator or designated TSDF and the shipment is stored in the transfer facility more than 24 hours and not to exceed ten (10) consecutive calendar days.

1. Record the manifest number and date the shipment enters the transfer facility.
2. Record the date the shipment leaves the transfer facility.
3. File the signed transporter copy of the manifest.
4. Transfer facility storage must not exceed ten days.
5. All shipments must meet all applicable DOT and RCRA requirements such as placarding and manifesting.
6. Transfer shipments must be inspected daily.
7. The manifest number, generator name and EPA ID number, TSDF name and EPA ID number, transporter name and EPA ID number, and number of containers shall be included in the operating record of the transfer facility. A copy of the manifest would document these items.

## **NON-RCRA REGULATED WASTE MANAGEMENT**

The inclusion of non-RCRA regulated waste information is for informational purposes only. These items are regulated under Subtitle D regulations and RCRA Subtitle C regulations do not apply (by definition). EQFL exceeds all applicable regulations for solid waste transfer facility operations. The EQFL solid waste transfer facility is similar to transfer facilities of other solid waste facilities except it happens to be located at a permitted facility.

## **HOUSEHOLD HAZARDOUS WASTE (HHW) MANAGEMENT**

EQFL manages a significant quantity of HHW. The HHW is solid waste (mostly labpacks) which is not hazardous waste as defined in 40 CFR 261.4 (b) 1). The HHW is regulated under Subtitle D regulations which (by definition) do not apply to this permit. The inclusion of HHW information is for informational purposes only. EQFL exceeds all applicable regulations for HHW Management. Nearly all HHW managed at the EQFL facility is managed as if it were hazardous waste. EQFL typically manifests (including Land Disposal Restriction notification) labels, and enters this information into the facility operating record for HHW shipments. Other permit requirements such as training, inspections, and contingency are typically adhered to by EQFL for the management of HHW. The management of HHW is included in EQFL facility capacity as labpack waste (20 gallons maximum per 55 gal. drum), containment, closure, and financial assurance calculations. Management of HHW does not interfere with management of RCRA regulated hazardous waste.

### **Stormwater Management System**

The EQFL facility is designed and built to minimize the potential release of hazardous waste or hazardous waste constituents to the air, soil or surface water. The waste storage and treatment building is totally enclosed. The building floor is more than four (4) feet above the grounds of the site to allow loading and unloading directly from truck to warehouse and from warehouse to truck. The building roof overhangs ten feet out over the loading and unloading docks.

Many features have minimized the potential of stormwater contacting hazardous waste or hazardous waste constituents. The ten-foot roof overhang reduces the amount of stormwater in the loading and unloading area. All waste managed in the loading and unloading area is in closed containers. Currently, an extra precautionary design of the facility is a stormwater filtration system. It should be noted that this system is not a required by this permit and is included for information purposes only.

The loading and unloading area is constructed of concrete and asphalt materials. The surface is sloped to containment trench. The containment trench runs from the north loading and unloading area to the south accumulation sump. All stormwater from the loading and unloading area flows to the 640-gallon concrete sump through the containment trench. The accumulated stormwater is pumped from the sump through a sand filter, two (2) carbon filters, and then to the stormwater drain where it flows (by gravity) to the stormwater retention pond.

The pump remains off during waste management operations with a potential of release of hazardous waste or hazardous waste constituents. When these operations (such as loading or unloading) are complete, the area, stormwater and stormwater systems are inspected. Unsatisfactory conditions (if any) are corrected prior to turning the pump on to activate the system. These inspections are also conducted daily (each operating day) as indicated the EQFL Inspection Plan.

The retention pond has dimensions of 126 feet x 35 feet with an average volume of 0.1335 acre-feet and a slope of 3:1. The pond retains filtered stormwater. Non-filtered stormwater from roof drains also discharges into the pond. The stormwater containment trenches and sump are constructed of concrete. The holding sump has a capacity of 640 gallons. The sump pump can pump 30-40 gallons per minute. The sand filter has 3.1 square feet of filter area in a fiberglass wrapped shell. The sand filter can accommodate flow rates of 20-62 gallons per minute. The sand filter is an efficient means of filtering out potential solids, oils and greases. The sand in the sand filter system typically lasts for many years. The EQFL sand filter will be changed twice per year. The filter can be back flushed when the filter pressure is high or the flow rate is restricted. Back flushed materials will be managed as either solid or hazardous waste depending upon the waste characterization. The carbon filter consists of a 55-gallon drum/carbon filter. The filter contains 200 pounds of activated carbon, which provides approximately three minutes of contact time at 20 gallons per minute. The filter is an effective means of filtering potentially toxic (organic and metal) constituents. The carbon will be replaced at least annually. Documentation of filter carbon replacement will be included in the facility operating record. EQFL may increase the

amount of sand or carbon if it becomes necessary. More frequent changing will occur if breakout or breakthrough is detected. The spent carbon will be managed as solid or hazardous waste (depending upon the waste characterization) if it is not returned to the manufacturer for regeneration.

### **Laboratory Sample Procedure**

1. Information for samples entering the lab will be entered on the appropriate container receiving reports.
2. Samples will then be analyzed according to hazard class and permit requirements as described in the EQFL Waste Analysis Plan.
3. Completed samples will be taken to the warehouse for 90-day (typically) holding pending potential need for additional analysis.
4. These samples are not laboratory wastes. Hazard class will determine the location of storage.
5. All samples are to be stored in containers according to date. Samples are to remain in storage containers, for reference purposes, approximately ninety days.
6. When samples are no longer needed for reference purposes, they then will become wastes. Waste samples will then be bulked into proper drums and a bulking list will be created.
7. The drums the waste samples are bulked into will be managed as hazardous waste if applicable.

### **Structures**

The facility structures include an office building, a 5,866 square foot (MOL) totally enclosed building utilized for the container storage and treatment of hazardous waste, and a loading/unloading vehicle area. The laboratory is located across the street at our 8<sup>th</sup> Avenue office complex. These structures are shown on Attachment 5.12, 5.13, 5.14, 6.1, 8.1, and 8.2. The office building is not utilized for RCRA regulated hazardous waste management other than QC analysis of samples in the laboratory as described in the Waste Analysis Plan.

The waste storage and treatment building is described in the Use and Management of Containers section of this permit renewal. The loading and unloading area is described in the Stormwater System part of this section.

There are several temporary or portable structures at the EQFL facility. These include supply shed and trailers, empty container (new or reconditioned) trailers, and an empty

container (used) trailer.

### **Equipment**

The EQFL facility equipment includes the items previously described in this section. These items are:

- Empty Container Waste (rags) Compactor
- Aerosol Recycling Unit
- Paint Can Processor
- Fluorescent Lamp Crusher

Equipment specifications for these items are included as Attachment 16.

The paint can processing, aerosol recycling, fluorescent bulb crushing, and empty drum and rag compactor equipment will be inspected prior to each batch use. The inspections will be included in the facility operating record. Filter replacement will be according to the manufacturer's specifications. Filter replacement will be documented in the facility operating record.

The EQFL facility also includes the Filter Press described in the Miscellaneous Unit section of this renewal. Filter press specifications are included as Attachment 13.

Other small portable equipment utilized at the EQFL facility includes containers, adsorbents, pallets, pumps, funnels, drum trucks (dollies), pallet jacks/stackers, forklifts, fork attachments, bung wrenches, ratchets, slings, vacuums, and other similar waste handling, emergency, and safety equipment.

## **15. MISCELLANEOUS UNITS (Filter Press)**

### **FILTER PRESS DESCRIPTION**

The only miscellaneous unit at the facility is the filter press located in an enclosed building with containment. The filter press is used to separate sludge waste into liquid and solid components. Sludge is pumped directly from a container through the press where a filter bank captures the solid material. The liquid component is collected in an empty container. After all the sludge has been processed, the filters are cleaned and the solids containerized as waste. This unit is typically used to process sludge that contain heavy metal and nonorganic materials. The unit is shown on Attachments 5.12, 5.14, 6.1, and 8.2. Manufacturer's specifications for the unit are included as Attachment 13.

When in use, the unit will be located within the enclosed storage building. The unit is currently unused and in storage. The unit will be located in the storage building during any on-site treatment. Treatment by the filter press is a batch process and not continuous. The filter press is air-operated, has no electrical parts, and will automatically shut down if air pressure is lost. If an emergency occurs, the process will cease and all open waste containers will be closed. Shutdown will occur, and any waste transfer or treatment operation will stop.

The maximum volume of waste treated by the filter press is estimated to be 6,000 gallons per day. EQFL currently does not use the filter press but, may (in the future) treat a maximum of 6,000 gallons per day of hazardous wastes prior to the expiration of the permit should business, environmental regulations, or economics justify the treatment.

# DECONTAMINATION

DC-4

## DECONTAMINATION OF HEAVY EQUIPMENT - Page 1 of 3

Decontamination of heavy equipment typically will be conducted for equipment that will come into direct contact with hazardous waste.

Filter press, Paint can processor, Compactor and Forklift

1	Number of hours needed to decontaminate all heavy equipment used during closure of the unit (Enter from attachment to this worksheet)	4 work hrs	
2	Cost of steam cleaner rental per hour <sup>a</sup>	\$ 5.98/hr	
3	Subtotal steam cleaner rental costs (Multiply line 1 by line 2)		\$ 23.92
4	Labor cost per work hour <sup>b</sup> Choose the appropriate level of PPE: a. Protection Level D \$ 30.10/work hr <sup>b</sup> b. Protection Level C \$ 45.30/work hr <sup>c</sup> c. Protection Level B \$ 58.11/work hr <sup>c</sup>	\$ 45.30	
5	Subtotal of labor costs (Multiply line 1 by line 4)		\$ 181.20
6	Volume of decontamination fluid (Multiply line 1 by 100 gallons per hour) <sup>d</sup> (The volume of decontamination fluids generated may be disposed of either in drums or as bulk liquid. If the volume is too large to be effectively handled by placement in drums, use TD-3 worksheet in Chapter 16 to calculate the transportation, treatment and disposal cost. If the decontamination fluids are to be placed in drums, complete lines 7 through 9.)	400 gal	
7	Number of drums required to contain decontamination fluid for removal (Divide line 6 by 55 gallons per drum and round up to the nearest whole number)	Tanker drums N/A	
8	Cost of one drum <sup>e</sup>	\$ 62.95/drum	
9	Cost of drums (Multiply line 7 by line 8)		\$ N/A
10	Cost of construction of temporary decontamination area for heavy equipment (Include this cost if permanent decontamination area does not exist) <sup>f</sup> NOTE: THIS COST SHOULD ONLY BE INCURRED ONCE FOR THE CLOSURE OF ALL UNITS		\$ 1,225.71

11	Cost of demolition of temporary decontamination area for heavy equipment (Include this cost if permanent decontamination area does not exist) <sup>a</sup> NOTE: THIS COST SHOULD ONLY BE INCURRED ONCE FOR THE CLOSURE OF ALL UNITS	\$ 852.10
TOTAL COST OF DECONTAMINATION OF HEAVY EQUIPMENT (Add lines 3, 5, 9, 10, and 11) (Enter total on worksheet DC-1, line 3)		\$ 2282.93

Remember to calculate costs for transporting, treating, and disposing of the wastes in drums generated from this activity. Use Worksheets TR-1 and TD-2 found in Chapters 15 and 16, respectively.

## Notes:

- <sup>a</sup> Cost derived from R.S. Means Company, Inc., *Means Building Construction Cost Data*, 1994, pg. 19, item no. 420-6300. Rental cost per hour was derived by dividing the daily rental rate by hours per day and adding the hourly operating cost:  $(\$45/\text{day} \div 8 \text{ hrs/day}) + \$0.35/\text{hr} = \$5.98/\text{hr}$ .
- <sup>b</sup> Cost derived from R.S. Means Company, Inc., *Means Building Construction Cost Data*, 1994, pg. 499, crew A-1. The cost provided is the hourly rate for one building laborer.
- <sup>c</sup> Cost derived from R.S. Means Company, Inc., *Means Building Construction Cost Data*, 1994, pg. 499, crew A-1. The cost provided is the hourly rate for one building laborer. See Appendix B of this manual for details of the calculation.
- <sup>d</sup> R.S. Means Company, Inc., *Means Building Construction Cost Data*, 1994, pg. 19, item no. 420-6300. Production rate of steam cleaner is 100 gal/hr.
- <sup>e</sup> Lab Safety Supply, *General Catalog*, 1993, pg. 354, 55-gallon, lock-ring, open head, 18-gauge steel drum.
- <sup>f</sup> Assume the temporary decontamination area is 25.5 ft by 17 ft and is constructed on a 3/4-in plywood base, with 6-in-by-8-in-by 8.5-ft railroad tie curbs and 2-in-by-8-in-by-16-in concrete blocks that hold the 6-mil polyethylene sheeting that covers the decontamination area.

Plywood - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1994, pg. 166, item no. 164-0200. The cost per ft<sup>2</sup> is \$0.56. A total of 433.5 ft<sup>2</sup> of plywood is needed to cover the decontamination area. The cost of the plywood was calculated by multiplying the cost per ft<sup>2</sup>, \$0.56, by the number of ft<sup>2</sup>, 433.5 = \$242.76.

Railroad Ties - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1994, pg. 62, item no. 258-0600. The cost per ft is \$2.25. A total of 10 railroad ties is needed to construct a curb around the decontamination area. The cost of the railroad ties was calculated by multiplying the cost per foot, by the length of each railroad tie, and by the number of railroad ties needed:  $\$2.25/\text{ft} \times 8.5 \text{ ft} \times 10 = \$191.30$ .

Polyethylene Sheeting - Lab Safety Supply, *General Catalog*, 1993, pg. 635, 20-ft-by-100-ft roll of 6-mil polyethylene sheeting. The cost per roll is \$54.95. A total of one roll is needed to cover the decontamination area.

Concrete Blocks - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1994, pg. 140, item no. 204-0020. The cost per block is \$0.70. A total of 15 concrete blocks is needed to hold the polyethylene sheeting. The cost of the blocks was calculated by multiplying the cost of one block by the number of blocks needed:  $\$0.70/\text{block} \times 15 = \$10.50$ .

Labor to Construct Decontamination Area - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1994, pg. 449, crew A-1. Assume that two building laborers at \$30.10 per hour will construct the decontamination area in eight hours. The cost of the labor was calculated by multiplying the cost per

hour for one building laborer, by the number of work hours needed to construct the decontamination area:  
 $\$30.10/\text{hr} \times 16 = \$481.60$ .

Equipment Rental - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1994, pg. 17, item no. 420-2020. One forklift will be needed to move the railroad ties into place. The cost of renting one forklift for one day was calculated by multiplying the operational cost per hour by 8 hours and adding the daily rental cost:  $(\$8.95/\text{hr} \times 8 \text{ hrs}) + \$173 = \$244.60$ .

The total cost of constructing the decontamination area is  $\$242.76 + \$191.30 + 54.95 + 10.50 + \$481.60 + \$244.60 = \$1,225.71$ .

- 2 Costs for demolition of the temporary decontamination area were derived as follows:

Labor to Demolish Decontamination Area - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1993, pg. 451, crew A-1. Assume that two building laborers, at  $\$30.10/\text{hr}$ , demolish the decontamination area in eight hours. The cost of the labor was calculated by multiplying the cost per hour for one building laborer, by the number of work hours needed to demolish the decontamination area:  
 $\$30.10/\text{hr} \times 16 \text{ hrs} = \$481.60$ .

Equipment Rental - R.S. Means Company, Inc., *Means Site Work and Landscape Cost Data*, 1993, pg. 17, item no. 420-2020. One forklift will be needed to move the railroad ties into place. The cost of renting one forklift for one day (8 hours) was calculated by multiplying the operational cost per hour by 8 hours and adding the daily rental cost:  $(\$8.95/\text{hr} \times 8 \text{ hrs}) + \$173 = \$244.60$ .

Drums to Contain Contaminated Polyethylene Sheeting - Lab Safety Supply, *General Catalog*, 1993, pg. 354, 55-gallon, lock-ring, open head, 18-gauge steel drum. The cost of one drum is  $\$62.95$ . Two drums are needed to contain the polyethylene sheeting. The cost of purchasing drums was calculated as follows:  
 $\$62.95/\text{drum} \times 2 \text{ drums} = \$125.90$ .

The total cost of demolishing the decontamination area is  $\$481.60 + \$244.60 + \$125.90 = \$852.10$ .

**Decontamination Times for Heavy Equipment<sup>a</sup>**  
**Reference for Line 1**

Use the following time estimates to calculate the total number of hours needed to decontaminate all heavy equipment. Assume that each piece of heavy equipment will be decontaminated at least once for the closure of each unit.

Equipment	Decontamination Time (Hrs)
Forklift	1
Rotary disc	1
Tractor	2
Tank wagon	2
Front-end loader	3
Dozer	3
Backhoe	3
Front shovel	3

Notes:

- <sup>a</sup> U.S. Environmental Protection Agency, *Final Guidance Manual: Cost Estimates for Closure and Post-Closure Plans (Subparts G and H)*, January 1987, EPA/530-SW-87-009, Volume III, pg. 5-2.

operation. The press will be shut down and plates opened allowing the filtered solids to be discharged to a container. Liquids and solids treated by the press will be analyzed to verify treatment and Land Disposal Restrictions (LDR) compliance as specified in 40 CFR 268. Hazardous waste solids will be placed in the proper transfer or storage location pending scheduling of outbound shipment to a permitted facility. Solids which are not hazardous waste will be placed in the proper transfer or storage location pending scheduling of outbound shipment to an approved facility. Filtered liquids will usually have been treated to the treatment standards specified in the LDR of 40 CFR 268. Treatment will be verified prior to disposal or off-site shipment. Treated filtered liquids may be discharged to Publicly Owned Treatment Works (POTW) or placed in the proper transfer or storage location pending scheduling of outbound shipment to an approved facility. Filtered liquids that are hazardous waste will be placed in the proper transfer or storage location pending scheduling of outbound shipment to a permitted facility.

The EQFL Treatment Log (Attachment 13) will be completed to document all treatment in the EQFL Operating Record. The filter press will be cleaned and decontaminated as necessary. All rinses and residues will be managed (at minimum) in the same manner as the waste processed through the press unless waste analysis determines otherwise. The press will be inspected upon completion of the treatment and clean-up.

### **Container Loading**

Typically, wastes are recontainerized from one container to another. Wastes are transferred between container by pumping (using a portable pump) or pouring directly from one container to another. Most container transfer operations take place within the storage building, loading to roll-offs and tankers will occur in the processing area located on the west (loading dock) side of the facility. Potential emissions due to container loading have been estimated.

### **Paint Can Processing**

The facility receives latex and solvent-based paint in one-gallon cans for recontainerization and disposal. This operation will include manually pouring or automatically processing with the paint can processor, crushing the paint can, collecting the paint waste, and containerizing the paint for transport off-site. Potential VOC emissions may result due to evaporation of solvents in the paint.

### **Aerosol Can Recycle**

The aerosol can recycler is a machine which crushes aerosol cans while simultaneously capturing all liquids into a 55 gallon drum. The aerosol can is placed within an enclosed unit and is punctured. The material within the can is ejected into the drum. A activated carbon filter unit is attached to the machine to capture any vapors expelled from the drum/can during the recycling operation. This operation will take place within the paint can crushing operations located in area 2A as illustrated on figure 5.13. Equipment specifications of the aerosol can recycling unit are included as Attachment 16.2.

A breakthrough detector is provided on the carbon canister to determine when the charcoal filter has reached its saturation point. The detector changes to a rusty brown color when it has reached its saturation level. The filters or filter media will be changed out as per the manufacturer's specifications (or equivalent). Spent filters will be managed as solid or hazardous waste (based upon waste determination). Filter specifications for the aerosol recycling unit suggest using approximately ½ pound of activated carbon per 1,200 aerosols.

Other assumptions made for the emission estimates will also produce conservative results:

1. The effect of the storage building for containment of VOC emissions was not taken into consideration. All evaporation was assumed to occur outdoors to ambient air. Most operations occur within the storage building by the roll up doors.
2. True vapor pressure at a temperature of 90 degrees Fahrenheit (deg F) was assumed for all emission calculations. Mean annual temperatures in the Tampa area for years 1961 through 1998 were approximately 82 deg F. Therefore, assuming a vapor pressure at 90 deg F would result in higher emission estimates on an annual basis.

Potential VOC emissions have been estimated for several operations at the facility. A summary of primary activities at the facility and estimated emissions is included on Table 1. Emission calculations for individual operations are included on Tables 2 through 6.

Total facility emissions were estimated to be just over 2.24 TPY. As mentioned, these emissions are based on conservative assumptions and actual emissions are expected to be much less.

### **Lead**

Lead is considered to be the most significant toxic heavy metal constituent handled at the facility. It is estimated that approximately 20 percent of all waste handled contains some quantity of lead. RCRA regulated lead hazardous waste managed usually ranges from 5 to 500 parts per million in concentration. Therefore, the amount of lead present at the facility is less than the amount of VOC present. Because the vapor pressure of lead in aqueous solution is much lower than for VOC, lead emissions are expected to be negligible based on the conservative estimate for VOC emissions.

#### **40 CFR 61 Subpart FF- Emission Standard for Benzene Waste Operations**

This subpart applies to owners and operators of chemical manufacturing plants, coke byproduct recovery plants, and petroleum refineries, or owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any of the affected facilities. Because EQFL does not currently accept waste from these facility types, this subpart does not apply.

#### **40 CFR 264 Subpart BB- Emission Standards for Equipment Leaks General**

Compliance with the requirements of 40 CFR 264, Subpart BB will be attained by the following the procedures described in this section. This section requires facilities to identify and repair leaks in specified pieces of equipment. Equipment is considered to be leaking when materials are dripping from pump seals or valves, or when an instrument reading of greater than 10,000 ppm is measured. The detection instrument used for monitoring will meet the performance criteria of Reference Method 21 in 40 CFR part 60. Equipment used to transfer hazardous waste (with an organic concentration of at least 10 percent by weight) at EQFL is used less than 300 hours per calendar year. Equipment in vacuum service is also used. This equipment is exempt from the requirements of Sections 264.1052 through 264.1060 once identified as required by 264.1050 (e) and (f). EQFL uses the pumps in light liquid service and trucks in vacuum service as identified below.

##### **Pumps in Light Liquid Service**

EQFL will utilize pumps to transfer materials within the processing area of the permitted facility. The total use of equipment subject to the requirements of this subpart will not exceed 300 hours per calendar year. Each pump will be inspected visually each calendar week to determine that no indications of leaking liquids from the pump seals are present. Additionally, if an instrument reading of greater than 10,000 ppm is measured the pump will be considered to be leaking. If a leak is detected it will be repaired as soon as practical, not to exceed 15 calendar days. No pump that is known to leak will be used for hazardous waste transfer operations. Further information concerning recontainerization procedures is included in Section 14 of this permit application.

### **Trucks in Vacuum Service**

EQFL will utilize equipment that is in vacuum service. Vacuum trucks identified as EQFL unit #s 50021, 50034, 50037, 50038, used to transport and transfer hazardous materials, are listed as required.

### **40 CFR 264 Subpart CC- Air Emission Standards for Tanks, Surface Impoundments, and Containers**

#### **General**

EQFL stores hazardous waste in containers greater than 26 gallons and as such must follow the requirements of 40 CFR 264 Subpart CC. Most of the hazardous waste processed by EQFL will have a VO concentration of greater than 500 ppmw. In most cases, hazardous waste that may have a VO concentration of less than 500 ppmw and will be managed as if it does have a VO concentration of greater than 500 ppmw. EQFL does not have any existing tanks, surface impoundments or hazardous waste stabilization treatment processes and therefore these items are not addressed in this permit.

#### **Standards for Containers**

EQFL shall control air pollutant emissions from all containers stored or processed at the permitted facility. The transfer of hazardous waste in or out of containers will be accomplished in a manner that minimizes the exposure of hazardous waste to the atmosphere. This will be done to the extent practical, considering the physical properties of the hazardous waste and good engineering practices. Containers having a design capacity of  $0.1\text{m}^3$  -  $0.46\text{ m}^3$  will be managed using U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as a Level 1 control standard. Containers will comply with the requirements of 49 CFR part 178, except as permitted by EQFL approved DOT exemption for lab packs managed in accordance with 49 CFR part 178 or combination packages specified in 49 CFR 173.12. Containers having a capacity of greater than  $0.46\text{ m}^3$ , that are in light service, will also comply with these DOT standards, as required, to provide Level 2 control. Containers meeting these standards are designed so that any potential release of VO concentrations are eliminated with proper care and use. EQFL will ensure that containers have secured closure devices (drum lid,

## ATTACHMENT NO. 2

### EQ FLORIDA INC. (EQFL) Summary of Characteristic and Listed Hazardous Wastes

Process Code	EPA Hazardous Waste Number	Waste Type	Estimated Annual Quantity (Gallons)
S01	D001	Ignitable	175,000
S01	D002	Corrosive	50,000
S01	D003	Reactive	5,000
S01	"D" Characteristic Waste (Excluding D001-D003)	Characteristic Hazardous Waste	90,000
S01	F001 & F002	Halogenated Solvents	10,000
S01	F003 & F005	Non-Halogenated	Included in D001
S01	F006-F012 & F019	Plating Wastes	24,000
S01	"F" Listed Wastes (Excluding F001, F002, F001, F005-F012, & F019)	Listed Wastes from Non-Specific Sources	1,000
S01	"K" Listed Wastes	Listed wastes from Specific Sources	1,000
S01	"U" Listed Waste	Toxic Wastes	<u>20,000</u> 377,000
T40	"D" Characteristic Waste (Excluding D001 & D003)	Characteristic Hazardous Waste	0*
T40	"F" Listed Wastes (Excluding F020-F023, F026, and F027)	Listed Waste from Non-Specific Sources	0*
			<u>0*</u>

\* EQFL currently does not plan to treat any wastes by using the filter press. EQFL may (in the future) treat wastes prior to the expiration of the permit should business, environmental regulations, or economics justify the treatment. Annual quantities will not exceed those permitted in Section 15.

BAY CAPACITIES:

Bay 1 - 20,000 gallons  
Bay 2 - 10,000 gallons  
Bay 3 - 20,000 gallons

Each bay may contain hazardous wastes with any of the **EQFL** permitted waste codes. The hazardous waste is segregated into separate bays (and containment) by hazard class and compatibility, not by waste code. Storage location by waste (hazard class) is indicated on Attachment 5.12.

## EPA Hazardous Waste Codes

### Characteristic Wastes

D001	D013	D025	D037
D002	D014	D026	D038
D003	D015	D027	D039
D004	D016	D028	D040
D005	D017	D029	D041
D006	D018	D030	D042
D007	D019	D031	D043
D008	D020	D032	
D009	D021	D033	
D010	D022	D034	
D011	D023	D035	
D012	D024	D036	

### Listed Wastes from Non-Specific Sources

F001	F006	F019	F032
F002	F007		F034
	F008	F020	F035
F003	F009	F021	
F005	F010	F022	F037
	F011	F023	F038
F004	F012	F024	F039
		F025	
		F026	
		F027	
		F028	

Listed Wastes from Specific Sources

K001	K047	K090	
K002	K048	K091	K147
K003	K049		K148
K004	K050	K093	K149
K005	K051	K094	K150
K006	K052	K095	K151
K007		K096	
K008	K060	K097	K156
K009	K061	K098	K157
K010	K062	K099	K158
K011		K100	K159
	K064	K101	K160
K013	K065	K102	K161
K014	K066	K103	
K015		K104	K162
K016	K069	K105	K163
K017		K106	K164
K018	K071	K107	K165
K019		K108	K166
K020	K073	K109	
K021		K110	
K022	K083	K111	
K023	K084	K112	
K024	K085	K113	
K025	K086	K114	
K026	K087	K115	
K027	K088	K116	
K028		K117	
K029		K118	
K030			
K031		K123	
K032		K124	
K033		K125	
K034		K126	
K035			
K036		K131	
K037		K132	
K038			
K039		K136	
K040			
K041		K140	
K042		K141	
K043		K142	
K044		K143	
K045		K144	
K046		K145	

Acute Toxic Hazardous Waste

P001	P036	P070	P108
P002	P037	P071	P109
P003	P038	P072	P110
P004	P039	P073	P111
P005	P040	P074	P112
P006	P041	P075	P113
P007	P042	P076	P114
P008	P043	P077	P115
P009	P044	P078	P116
P010	P045		
P011	P046	P081	P118
P012	P047	P082	P119
P013	P048		P120
P014	P049	P084	P121
P015	P050	P085	P122
P016	P051		P123
P017		P087	
P018	P054	P088	P127
		P089	P128
P020	P056		
P021	P057	P092	P185
P022	P058	P093	
P023	P059	P094	P187
P024	P060	P095	P188
		P096	P189
P026	P062	P097	P190
P027	P063	P098	P191
P028	P064	P099	P192
P029	P065		P193
P030	P066	P101	P194
P031	P067	P102	P195
	P068	P103	P196
P033	P069	P104	P197
P034		P105	P198
		P106	P199
			P200
			P201
			P202
			P203
			P204
			P205

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Southwest District

Toxic Wastes

U001	U052	U103	U152	U204		U409
U002	U053		U153	U205	U359	U410
U003		U105	U154	U206	U360	U411
U004	U055	U106	U155	U207	U361	
U005	U056	U107	U156	U208	U362	
U006	U057	U108	U157	U209	U363	
U007	U058	U109	U158	U210	U364	
U008	U059	U110	U159	U211	U365	
U009	U060	U111	U160		U366	
U010	U061	U112	U161	U213	U367	
U011	U062		U162	U214	U368	
U012	U063	U113	U163	U215	U369	
	U064	U114	U164	U216	U370	
U014		U115	U165	U217	U371	
U015	U066	U116	U166	U218	U372	
U016	U067	U117	U167	U219	U373	
U017	U068	U118	U168	U220	U374	
U018	U069	U119	U169	U221	U375	
U019	U070	U120	U170	U222	U376	
U020	U071	U121	U171	U223	U377	
U021	U072	U122	U172		U378	
U022	U073	U123	U173	U225	U379	
U023	U074	U124	U174	U226	U380	
U024	U075	U125		U227	U381	
U025	U076	U126	U176	U228	U382	
U026	U077	U127	U177		U383	
U027	U078	U128	U178	U234	U384	
U028	U079	U129	U179	U235	U385	
U029	U080	U130	U180	U236	U386	
U030	U081	U131	U181	U237	U387	
U031	U082	U132	U182	U238	U388	
U032	U083	U133	U183	U239	U389	
U033	U084	U134	U184	U240	U390	
U034	U085	U135	U185		U391	
U035	U086	U136	U186	U243	U392	
U036	U087	U137	U187	U244	U393	
U037	U088	U138	U188		U394	
U038	U089	U139	U189	U246	U395	
U039	U090		U190	U247	U396	
	U091	U140	U191	U248	U397	
U041	U092	U141	U192	U249	U398	
U042	U093	U142	U193		U399	
U043	U094	U143	U194	U271	U400	
U044	U095	U144			U401	
U045	U096	U145	U196	U277	U402	
U046	U097	U146	U197	U278	U403	
U047	U098	U147		U279	U404	
U048	U099	U148	U200	U280	U405	
U049		U149	U201	U328	U406	
U050	U101	U150	U202		U407	
U051	U102	U151	U203	U353	U408	

## **ATTACHMENT N0.5**

### **FACILITY DRAWINGS & MAPS**

- 5.1 Location Map
- 5.2 Aerial Photography
- 5.3 City of Tampa Zoning Map
- 5.4 Topographical Map
- 5.5 Flood Plain Map
- 5.6 Existing Land Use and Owners
- 5.7 Traffic Flow
- 5.8 Security
- 5.9 Evacuation Routes
- 5.10 Routes to Hospitals
- 5.11 Surface Water Flow, Drainage, and Run-Off
- 5.12 Container Storage Building Diagram (Overview)
- 5.13 Loading/Unloading Areas
- 5.14 Solid Waste Management Units
- 5.15 Stormwater Filtration System
- 5.16 Waste Management Locations

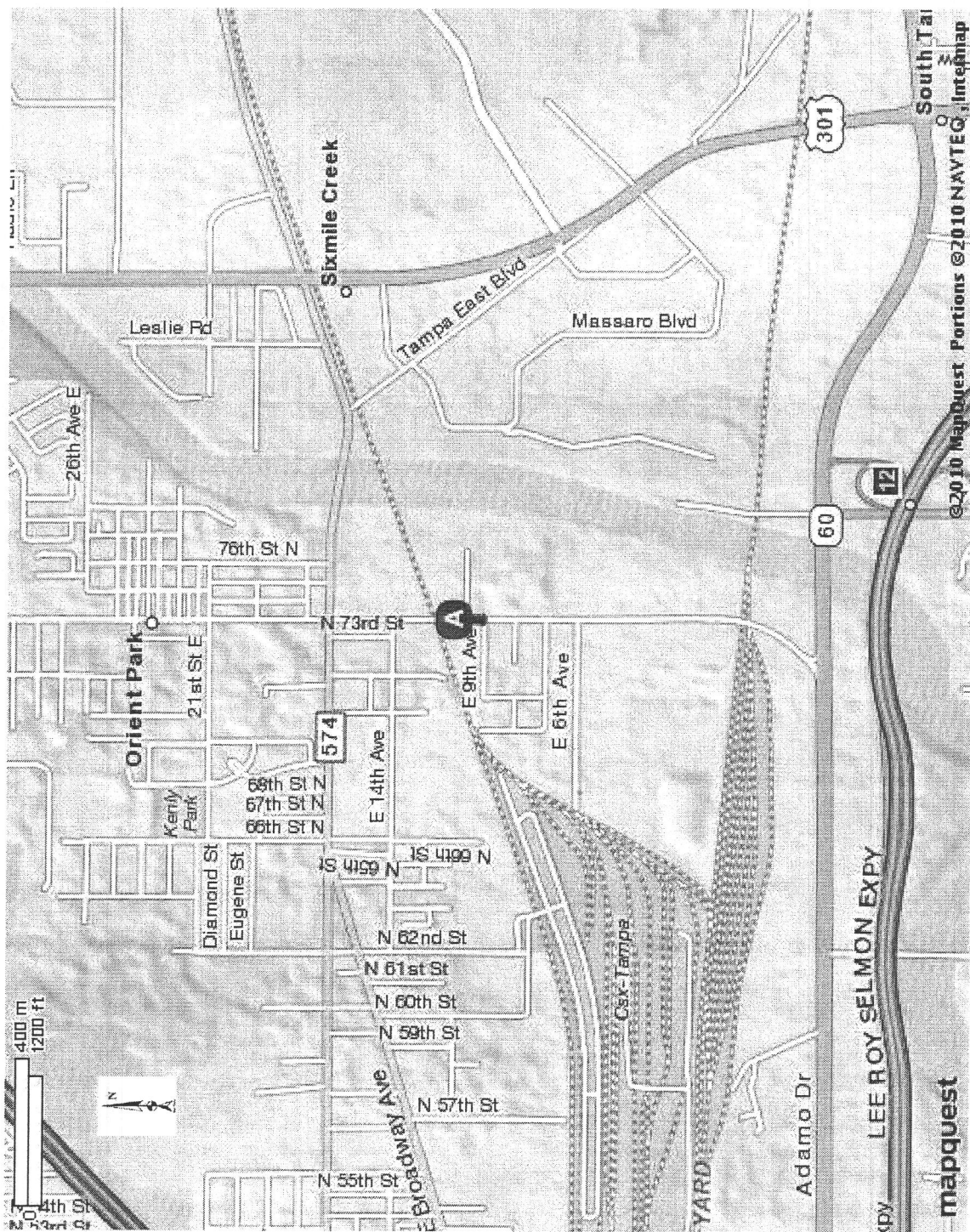
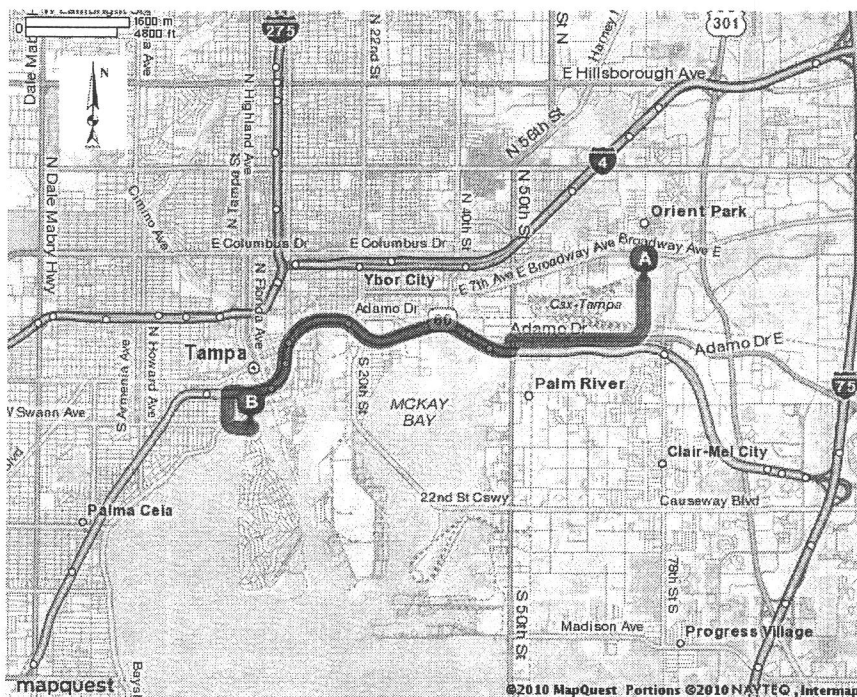


Figure 5.1 Location Map, EQ Florida, Inc., Tampa, FL





Driving directions from EQ Florida, Inc. to Brandon Regional Hospital, 119 Oakfield Drive, Brandon, FL 33511



Driving directions from EQ Florida, Inc. to Tampa General Hospital, 1 Tampa General Circle, Tampa, FL 33606

Figure 5.10. Routes to Hospitals, EQ Florida, Inc., Tampa, Florida

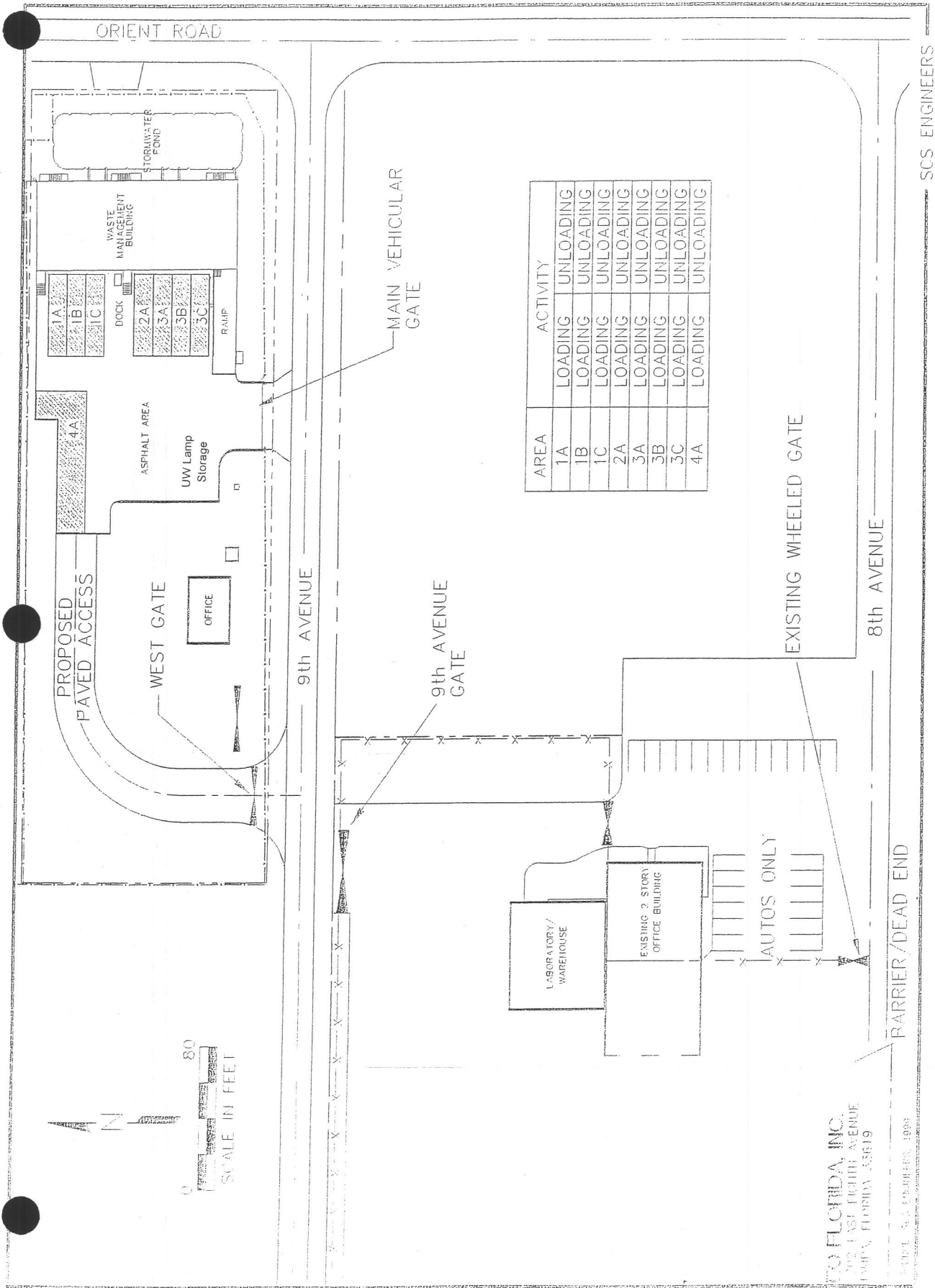
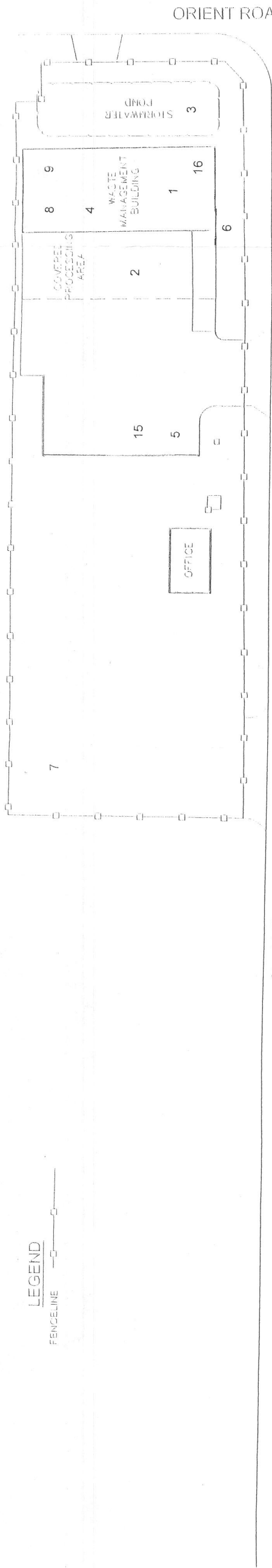


Figure 5.13. Orient Road Facility Loading/Unloading Areas, EQ Florida, Inc., Tampa, Florida

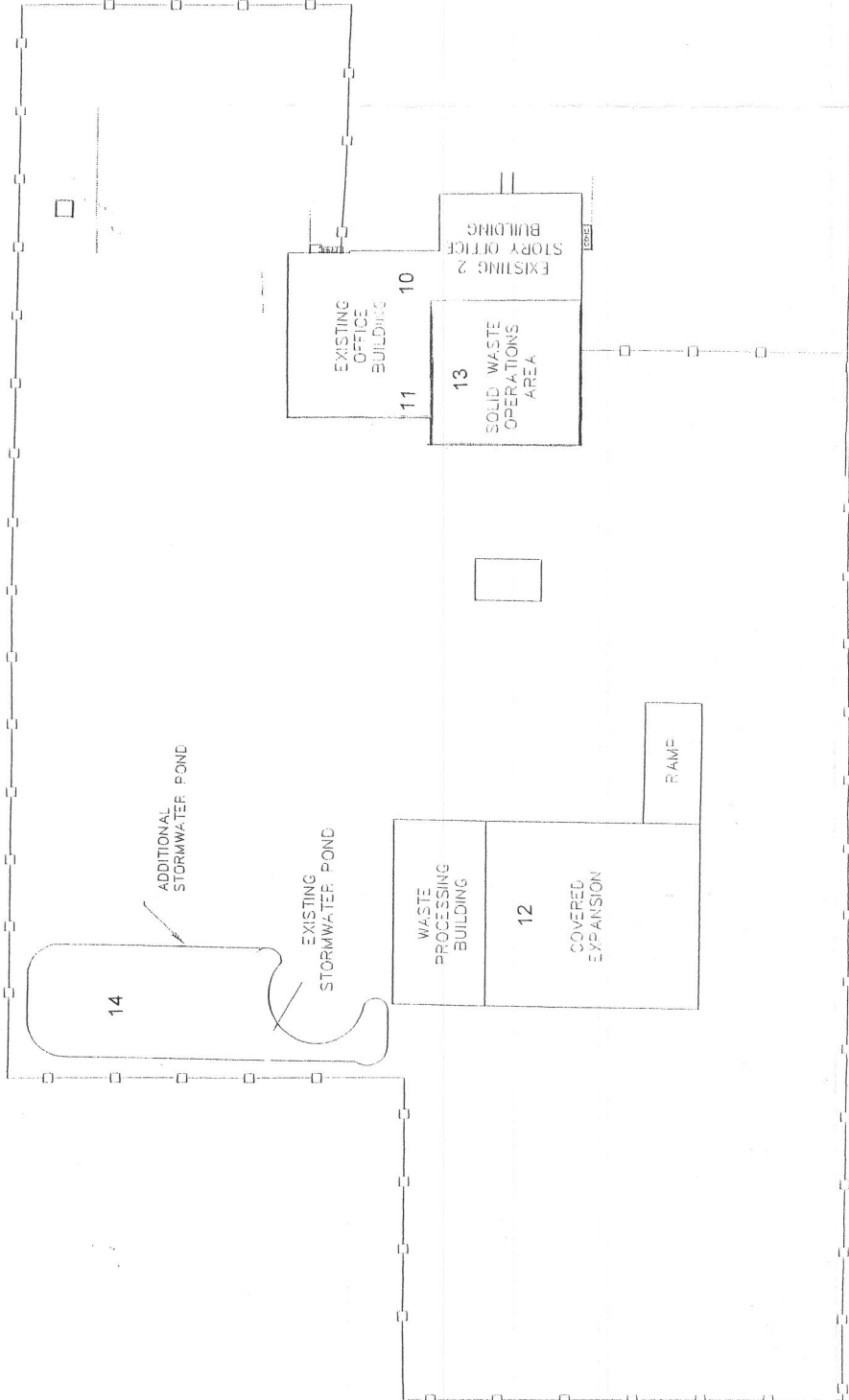
LEGEND

FENCELINE



LEGEND

- 1 Container Storage Area / 5 sumps
- 2 Loading/Unloading Dock
- 3 Stormwater Retention Pond
- 4 Filter Press
- 5 Municipal Waste Dumpster
- 6 Stormwater Carbon & Sand Filter
- 7 Sanitary Sewer Drain field and Septic Tank
- 8 Transfer Facility
- 9 Used Oil Facility
- 10 Satellite Accumulation Area
- 11 Parts Washer
- 12 Materials Processing Facility
- 13 Solid Waste Operations Area
- 14 Additional Retention Pond
- 15 Universal Waste Lamp Storage Area
- 16 Universal Waste Battery Storage Area



8th AVENUE

9th AVENUE

ORIENT ROAD

Figure 5.14  
Solid Waste Management Units,  
EQ Florida, Inc., Tampa, Florida

**KLEINFELDER**  
Bright People. Right Solutions.

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TEL (800) 481-6229 FAX (813) 881-3923 www.kleinfelder.com

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EQ-FLORIDA.dwg  
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CHECKED BY  
RHW  
DATE  
015-08-125

EO FLORIDA  
ORIENT ROAD  
FLORIDA

TAMPA  
THIS DRAWING AND ALL  
INFORMATION CONTAINED  
HEREIN IS THE PROPERTY OF  
KLEINFELDER, INC. AND IS NOT  
TO BE USED BY ANYONE OTHER  
THAN THE CLIENT WITHOUT  
WRITTEN CONSENT

DATE 03/18/03  
SCALE 1" = 75'  
FIGURE

SCALE IN FEET  
0 75 140

FIGURE

5.14

**Solid Waste Management Unit (SWMU)  
Identification Summary**

<b>SWMU NO.</b>	<b>TYPE OF UNIT</b>	<b>YEARS OF OPERATION</b>	<b>WASTE MANAGED</b>	<b>EVIDENCE</b>
1	Container Storage Area / 5 sumps	June 1990 - Present	Permitted Wastes	None
2	Loading/Unloading Dock	June 1990 - Present	Permitted Wastes	None
3	Stormwater Retention Pond	June 1990 - Present	Stormwater	None
4	Filter Press	June 1990 - Present (currently not in use)	Non-Hazardous (one time test) batch	None
5	Municipal Waste Dumpster	June 1990 - Present	RCRA Empty Containers, Office Waste	None
6	Stormwater Carbon & Sand Filter	June 1990 - Present	Stormwater	None
7	Sanitary Sewer Drain field and Septic Tank	June 1990 - June 1995	Sanitary Sewage	None
8	Transfer Facility	June 1990 - Present	Permitted Wastes	None
9	Used Oil Facility	June 1990 - Present	Used Oil	None
10	Satellite Accumulation Area	January 2001 - Present	Laboratory Waste	None
11	Parts Washer	July 2009 - Present	Parts Washer Solvent	None
12	Material Processing Facility	June 2006 - Present	Non-Hazardous Solid Waste	None
13	Solid Waste Operations Area	July 2010 - Present	Non-Hazardous Solid Waste	None
14	Additional Retention Pond	July 2010 - Present	Stormwater	None
15	Universal Waste Lamp Storage Area	February 2004 - Present	Universal Waste Lamps	None
16	Universal Waste Battery Storage Area	February 2004 - Present	Universal Waste Batteries	None

Solid Waste Management Units are shown on Figure 5.14.