Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

July 19, 2018

Jerry Adams, E.D., Environmental Coordinator
Tampa Electric Company (TECO)
P.O. Box 111
Tampa, FL 33601-0111
gadams@tecoenergy.com

Re: Tampa Electric Co – Central Operations
EPA ID #FLD981477904
Hillsborough County

Dear Mr. Adams:

Department personnel conducted a routine hazardous waste compliance evaluation inspection of the above-referenced facility on June 18, 2018. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Ileana Hernandez at (813) 470-5945, or via e-mail at: ileana.hernandez@floridadep.gov.

Sincerely,



Shannon Kennedy
Environmental Manager

Enclosure: Inspection Report

ec: Patrice Jackson, TECO, pjackson@tecoenergy.com
Gerry Javier, EPCHC, Javier@epchc.org

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Tampa Electric Co - Central Operations

On-Site Inspection Start Date: 06/18/2018 **On-Site Inspection End Date:** 06/18/2018

ME ID#: 35654 **EPA ID#:** FLD981477904

Facility Street Address: 2200 E Sligh Ave, Tampa, FL 33610-1334

Contact Mailing Address: PO Box 111, Tampa, FL 33601

County Name: Hillsborough **Contact Phone:** (813) 228-4257

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for SQG (100-1000 kg/month) facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Ileana A Hernandez, Environmental Specialist II
Other Participants:	Shannon Kennedy, Environmental Manager; Beth Knauss, Environmental Consultant; Patrice Jackson, Environmental Specialist; Jerry Adams, ED Environmental Coordinator

LATITUDE / LONGITUDE: Lat 28° 0' 44.9314" / Long 82° 25' 58.1081"

SIC CODE: 4911 - Trans. & utilities - electric services

TYPE OF OWNERSHIP: Private

Introduction:

The Tampa Electric Company, Central Operations Center (“COC”) was inspected on June 18, 2018, to determine the facility's compliance with state and federal hazardous waste regulations. The COC is notified as a small quantity generator of hazardous waste, as well as a used oil transporter and transfer facility. The inspectors were accompanied throughout the facility by Ms. Patrice Jackson and Mr. Jerry Adams. The COC also has multiple regulated, above-ground storage tanks under the storage tank ID # 8624791.

Process Description:

The COC is a clearing house for all Tampa Electric Company (“TECO”) equipment needing repairs, including vehicles and transformers. Since the previous inspection, there has been little change to the facility, and more details regarding the facility may be found in the prior inspection reports. Operations have not changed significantly since the previous inspection, unless noted below. It also collects hazardous, non-hazardous, and universal wastes from other TECO conditionally exempt small quantity generator facilities and ships them for disposal. TECO also transports used transformer oil to this location for consolidation. As the company transports more than 55 gallons of oil at a time, and stores oil more than 24 hours, it is subject to 40 CFR Part 279. In addition, TECO continues to store remediation waste on site from transformer releases pending receipt of analytical results; recovered soil and debris is stored in 55-gallon drums, which are closed and located on pavement. The COC is an episodic small quantity generator of hazardous waste and maintains compliance with small quantity generator rules and regulations.

The inspection report is written to match the order of the inspection walk-through.

#1 INVESTMENT RECOVERY – Building “F”

The Investment Recovery building houses the main office, which includes offices and conference rooms, refurbishing area, transformer repair shop, and the 180-day hazardous waste storage area, universal waste storage, and used oil.

The 180-day storage area is equipped with a grated floor over a sealed, concrete sump. At the time of the inspection, the 180-day hazardous waste storage area had one 55-gallon black drum and three 5-gallon white buckets; these four containers were awaiting the results of the hazardous waste analysis, which is completed off-site at TECO's central testing lab. Hazardous waste was last shipped on a hazardous waste manifest to EQ Florida on June 19, 2108, and included ten gallons of waste paint related material (D001). The COC is conducting weekly container inspections of the 180-day storage area. At the time of the inspection, the logs were up to date and contained all necessary information.

Near the 180-day storage area there are two Universal Waste storage areas: one inside directly next to the 180-day area, the other located outside along the east side of the building. This area also includes a satellite accumulation container for waste aerosol cans. The COC has containers for the collection of capacitors, mixed batteries, photo cells and switches. Waste streams are either managed as a universal waste or being collected for recycling, as applicable. All containers were appropriately labeled, closed, and dated as required.

Used oil is picked up by TECO technicians from field locations and returned here for temporary storage until being picked up for recycling by PetroTech. Used oil is stored outside, on the east side of the IR building as well as on the north end of the property in the tank farm (to be discussed in more detail later in this report). There are 3 above-ground storage tank systems next to the IR building: a 2,000-gallon used oil, an 8,000-gallon used FR3 oil, and a 6,000-gallon used mineral oil; all of which are double-walled and properly labeled. Used oil was observed to be leaking from an air compressor near the used mineral oil AST. This was addressed and corrected during the inspection.

#2 PCB Building– "P"

The PCB building contained a burned transformer, which was determined to be non-hazardous, and unused spill prevention kit items.

#3 BUSHING BUILDING – "L"

The Bushing Building is used exclusively for the storage of new, unused bushings only.

#4 LEAKER ROOM Building "P"

Located next to the PCB building, this room is used to temporarily store transformers that are leaking and may potentially contain PCBs pending analysis.

#5 MOBILIZATION ROOM FOR FIELD PERSONNEL – Building "J"
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*No hazardous waste is generated in this room.

#6 GARAGE – Building "B"

- 20 service bays
- One properly labeled, double-walled used oil tank with 500-gallon capacity observed near the entrance of the building.
- Several aqueous parts washers were observed throughout the building.
- Several satellite 55-gallon drums were observed containing either waste fuel, used antifreeze, used oil, used oil filters, used oily rags, and aerosol cans. An aerosol can puncturing satellite drum was also observed in the oil storage area of the building.

#7 PREP SHOP NORTH– Building “A”

In the paint booth there was one 55-gallon metal drum which served as the satellite accumulation container for hazardous waste paint. The drum was grounded and properly labeled. There are floor drains in the paint booth that are no longer in use and have been sealed off.

#8 PREP SHOP SOUTH – Building “A”

This room is used for mixing paint and painting transformers. Paint-related waste material is placed into a 55-gallon satellite hazardous waste drum.

#9 CONTAMINATED SOIL AREA

Numerous drums of contaminated soil are stored in 55-gallon drums on-site until they are tested and cleared for disposal by thermal treatment. Currently, Lakeland Laboratories conducts the analytical testing and Clark Environmental transports the drums for thermal treatment.

#10 CARPENTRY SHOP – Building “G”
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* No hazardous materials were observed in the carpentry shop at the time of the inspection.

#11 TANKER FARM – USED OIL TRANSFER AREA

- Mobile sub-transformers
- Oil-filled portable generators
- 3 used oil tankers; labeled and stored on an impervious surface with secondary containment

#12 – Mineral Oil AST

One 25,000-gallon above ground storage tank, storing compressor mineral oil. Oil was observed to have been discharged in the secondary containment area surrounding the pump. It appeared that an attempt to absorb the used oil with absorbent pads and booms was underway; however, free liquid was noted. The oil was properly managed and disposed of during the inspection.

#13 KEYS & SECURITY – Building “M”
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*No hazardous waste was observed in this building. However, a small shed south of this building was being used as a universal waste lamp storage shed. One out of at least five universal containers were not properly labeled at the time of the inspection; this was corrected during the inspection.

#14 TOOL ROOM
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*No hazardous waste is generated in this room. This room is used for product storage.

PAPERWORK REVIEW

Records reviewed included: an integrated contingency plan, waste manifests, used oil shipping receipts, universal waste bills of lading, weekly inspection checklist logs, and employee training documentation.

The COC maintains an Integrated Contingency Plan (“ICP”) for the facility. At the time of the inspection, an outdated version was produced; after the inspection, an electronic version of the most recent ICP was

submitted. Emergency response arrangements, which were last made in June 2010, must be kept up to date; the facility shall ensure that after any updates are made to the ICP, a copy of the updates are sent to the appropriate local emergency Reponses agencies.

Hazardous waste manifests were reviewed after the inspection; no issues or inaccuracies were noted.
Used oil is shipped on a monthly basis; used oil sent for recycling is managed by PetroTech.
Universal wastes are handled by Veoia, located in Tallahassee Florida.
Employee training has been conducted and documented. The facility maintains an active used oil transporter and transfer facility registration which expires on June 30, 2019, and the facility's required insurance is up to date.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(d)(3)
Question Number:	5.17
Question:	clean up and manage properly the released used oil and other materials? 279.22(d)(3)
Explanation:	An oily discharge onto pavement must be immediately and properly cleaned up. Virgin mineral oil was observed in the secondary containment area of the pump of the 25,000-gallon mineral oil tank.
Corrective Action:	CORRECTED during the inspection (6/18/2018). On 6/28/2018, the Department received documentation that the facility had properly cleaned and disposed of the oily discharge.

Photo Attachments:

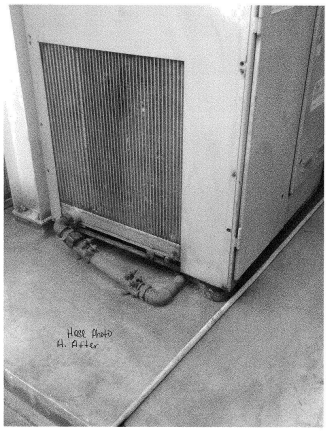
Virgin mineral oil - 25,000 gallon AST



Virgin mineral oil release - pump basin of 25,000 gallon AST



CORRECTED: After clean-up of oily discharge on pavement from air compressor



CORRECTED: After clean-up of spilled mineral oil into containment



Type: Violation

Rule: 273.14(e), 62-737.400(5)(b)

Explanation: Universal waste lamps, devices or the containers in which they are stored shall be labeled or marked clearly as specified in 40 C.F.R. 273, shall also include the accumulation start date, and be stored in a structurally sound and closed container.

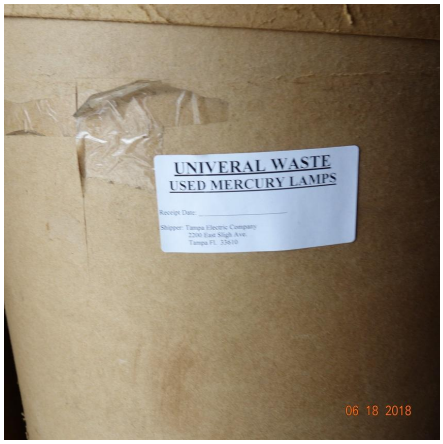
Corrective Action: CORRECTED during the inspection (6/18/2018). On 6/28/2018, the Department received documentation of the containers properly labeled and marked with the words, "Universal Waste: Used Mercury Lamps."

Photo Attachments:

Opened box of spent lamp



spent lamps without accumulation start date



CORRECTED: spent lamps closed and labeled

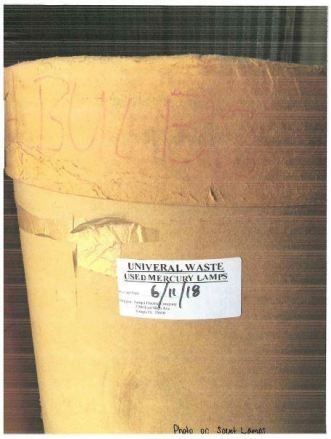


PHOTO ATTACHMENTS:

180-day hazardous waste storage area



Pre-burn drum storage area



Conclusion:

Based on the observations made at the time of the inspection, the facility was operating in compliance with state and federal used oil management rules and regulations applicable to used oil transporters and transfer facilities.

However, the facility was not operating in compliance with state and federal hazardous waste rules and regulations applicable to small quantity generators. Corrective actions were taken by the facility and completed during the inspection and documentation was provided to the Department on 6/28/2018. The facility has since returned back to compliance.

3.0 - Small Quantity Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	40 CFR 262 Subpart A -- General Standards	Yes	No	N/A
3.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
3.2	Has the facility obtained an EPA ID number? 262.18(a)	✓		
3.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.18(c)	✓		
3.4	Are any hazardous wastes treated or disposed of on site?			
3.5	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
3.6	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
3.7	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			✓
3.8	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
3.9	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
3.10	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
3.11	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)	✓		
3.12	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
3.13	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
3.14	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)			✓
3.15	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
3.16	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
3.17	If the generator choses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)	✓		
3.18	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
3.19	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		
3.20	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
3.21	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
3.22	Is the generator a small quantity generator (SQG) using a tolling agreement pursuant to 40 CFR 262.20(e)?			
3.23	Did the SQG comply with the applicable notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10)			✓
3.24	Has the SQG retained on-site a copy of the notification and certification, along with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10)			✓

Item No.	The Manifest	Yes	No	N/A
3.25	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are NOT in compliance) 262.20(a)(1) ☐ Item 1. Generator's U.S. EPA Identification Number ☐ Item 2. Page 1 of "X" (total number of pages used to complete the manifest) ☐ Item 3. Emergency Response Phone Number (must meet requirements below) ☐ Item 4. Manifest Tracking Number ☐ Item 5. Generator's Mailing Address, Phone Number and Site Address ☐ Item 6. Transporter 1 Company Name & U.S. EPA ID Number ☐ Item 7. Transporter 2 Company Name & U.S. EPA ID Number ☐ Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number ☐ Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. ☐ Item 10. Containers (Number and Type) ☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) ☐ Item 12. Units of Measure (Weight/Volume) ☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. ☐ Item 14. Special Handling Instructions and Additional Information ☐ Item 15. Generator's / Offeror's Certifications ☐ Item 16. International Shipments (Import or Export must be noted) ☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) ☐ Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) ☐ Item 19. Hazardous Waste Report Management Codes ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✓		
3.26	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
3.27	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
3.28	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
3.29	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
3.30	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
3.31	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) ☐ The next non-rail transporter? ☐ The Designated Facility if transported solely by rail? ☐ The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
3.32	If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b)			✓
3.33	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
3.34	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
3.35	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	**Pre Transport Requirements**	**Yes**	**No**	**N/A**
3.36	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
3.37	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
3.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
3.39	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are NOT in compliance)			✓

Item No.	Pre Transport Requirements	Yes	No	N/A
	262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?			✓
3.40	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	**Accumulation Requirements**	**Yes**	**No**	**N/A**
3.41	Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16	✓		
3.42	Check the applicable accumulation unit if the facility accumulates hazardous waste on-site prior to treatment or disposal ☒ Containers - Complete Container Checklist below ☐ Tanks - Complete Tanks Checklist below			
3.43	Does the facility comply with the 180-day accumulation time limit? 2262.16(b)	✓		
3.44	If NO, has the facility been issued an extension by the Department? 2262.16(d)			✓
3.45	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.16(b)(1)	✓		
3.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.16(b)(6)(i)(C)			✓
3.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.16(b)(6)(i)(A)			✓
3.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
3.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)			✓
3.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	✓		
3.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 2262.15(a)(1)	✓		
3.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 2262.15(a)(1)	✓		
3.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 2262.15(a)(4)	✓		
3.54	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)	✓		
3.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point?			
3.56	If YES, after 3 days did the generator mark an accumulation start date on the excess waste container? 262.16(b)(6)(i)(C)			✓
3.57	If YES, after 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.16(b)(6)(i)(A)			✓
Item No.	**Emergency Information/Personnel Training**	**Yes**	**No**	**N/A**
3.58	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i)	✓		
3.59	Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii) ☐ Name and telephone number of the Emergency Coordinator ☐ Location of fire extinguishers and spill control material, and, if present, fire alarm ☐ Telephone number of the fire department, unless the facility has a direct alarm (911 is acceptable)	✓		
3.60	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii)	✓		
3.61	Has the facility had to respond to any emergencies in the past 3 years?			
3.62	If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.16(b)(9)(iv) ☐ FIRE - Call fire department or attempt to extinguish with a fire extinguisher ☐ SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil ☐ FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch Office and National Response Center and report			✓

Item No.	Use and Management of Containers	Yes	No	N/A
3.63	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.16(b)(2)(i)			✓
3.64	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.16(b)(2)(ii)			✓
3.65	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.16(b)(2)(iii)(A)			✓
3.66	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.16(b)(2)(iii)(B)			✓
3.67	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.16(b)(2)(iv)	✓		
3.68	Does the generator properly document the weekly inspections? This should include at a minimum:(Check items below that are NOT in compliance) 62-730.160(3) ☐ Date and Time of inspection ☐ Legibly printed name of inspector ☐ Number of hazardous waste containers ☐ Condition of containers ☐ Notation of observations made ☐ Date and nature of any repairs or remedial actions	✓		
3.69	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 262.16(b)(2)(v)(A)? 262.16(b)(2)(v)(A)			✓
3.70	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)			✓
3.71	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C)			✓
Item No.	**Tanks Requirements for SQGs**	**Yes**	**No**	**N/A**
3.72	Does the facility treat or store hazardous waste in tanks?			
3.73	If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A)			✓
3.74	Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B)			✓
3.75	Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C)			✓
3.76	If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D)			✓
3.77	Does the facility inspect, where present, the following at least once each operating day:			
3.78	Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A)			✓
3.79	Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B)			✓
3.80	The level of waste in the tank? 262.16(b)(3)(iii)(C)			✓
3.81	Does the facility inspect the following at least weekly:			
3.82	The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 262.16(b)(3)(iii)(D)			✓
3.83	The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 262.16(b)(3)(iii)(E)			✓
3.84	Does the facility accumulate waste in tanks or tank systems that have full secondary containment and either leak detection equipment to alert facility personnel to leaks or established workplace practices to ensure leaks are promptly identified?			
3.85	If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 262.16(b)(3)(iv)			✓
3.86	Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 262.16(b)(3)(iv)			✓
3.87	Does the documentation include a description of the established workplace practices at the facility? 262.16(b)(3)(iv)			✓
3.88	Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 262.16(b)(3)(vi)			✓
3.89	Does the facility manage ignitable or reactive waste in tanks?			
3.90	If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 262.16(b)(3)(vii)(A) ☐ If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to			✓

Item No.	Tanks Requirements for SQGs	Yes	No	N/A
	☐ integrity of the device, etc. - are met? ☐ If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? ☐ If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies?			✓
3.91	If the facility treats or stores ignitable or reactive waste in a covered tank does the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 262.16(b)(3)(vii)(B)			✓
3.92	If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(1)			✓
3.93	If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(2)			✓
Item No.	Preparedness and Prevention	Yes	No	N/A
3.94	Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 262.16(b)(8)(i)	✓		
3.95	Does the facility have an internal communication or alarm system? 262.16(b)(8)(ii)(A)	✓		
3.96	Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.16(b)(8)(ii)(B)	✓		
3.97	Is the fire control equipment adequate? 262.16(b)(8)(ii)(C)	✓		
3.98	Is spill control and decontamination equipment present? 262.16(b)(8)(ii)(C)	✓		
3.99	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 262.16(b)(8)(ii)(D)			✓
3.100	Is the emergency equipment inspected and tested periodically? 262.16(b)(8)(iii)	✓		
3.101	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 262.16(b)(8)(v)	✓		
3.102	Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A) ☐ Fire Department ☐ Police ☐ Hospital ☐ Emergency Response Contractor	✓		
3.103	If NO has the facility attempted to do so and is the refusal documented? 262.16(b)(8)(vi)(B)			✓
Item No.	Record keeping and Reporting	Yes	No	N/A
3.104	Is the generator keeping records of exception reports? 262.42(b)			✓
3.105	Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.11(f)			✓
3.106	Are the records kept on-site? 262.40	✓		
3.107	Are records kept for a minimum of 3 years? 262.40	✓		
3.108	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
3.109	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was inteneded to be shipped off-site? 262.83(b)			✓
3.110	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
3.111	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

5.0 - Used Oil Generator Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)		✓	
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		

Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	**Releases from Used Oil Filter Containers**	**Yes**	**No**	**N/A**
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oi62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4			✓
Item No.	**Used Oil Mixtures**	**Yes**	**No**	**N/A**
	☐ Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	☐ Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	☐ Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	**Space Heaters**	**Yes**	**No**	**N/A**
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓

Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)	✓		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)	✓		
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓

Item No.	Marketing and Processing	Yes	No	N/A
	☐ Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]			
	☐ Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Ileana A Hernandez	Environmental Specialist II	
Principal Inspector Name	**Principal Inspector Title**	
	FDEP-SWD	07/19/2018
Principal Inspector Signature	**Organization**	**Date**

Shannon Kennedy	Environmental Manager
Inspector Name	**Inspector Title**
	FDEP-SWD
	Organization

Beth Knauss	Environmental Consultant
Inspector Name	**Inspector Title**
	FDEP-SWD
	Organization

Patrice Jackson	Environmental Specialist
Representative Name	**Representative Title**
	Tampa Electric Co (TECO)
	Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Jerry Adams	ED Environmental Coordinator
Representative Name	**Representative Title**
	Tampa Electric Co (TECO)
	Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Shannon Kennedy **Inspection Approval Date:** 07/19/2018