FLORIDA DEPARTMENT OF
Environmental Protection

Northwest District
470 Harrison Avenue
Panama City, Florida 32401

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

September 11, 2018

Matt Melott
Veolia ES Technical Solutions, LLC
700 E Butterfield Rd Ste 201
Lombard, IL 60148
Matthew.melott@veolia.com

Re: Veolia ES Technical Solutions, LLC
EPA ID No.: FLR0000207449
Leon County

Dear Mr. Melott:

Department personnel conducted a hazardous waste compliance inspection of the above-referenced facility on August 14, 2018. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to return this facility to compliance with state and federal rules. If you have any questions or comments, please contact Ms. Heather A. Perkins at (850)245-7626 or by e-mail at Heather.A.Perkins@dep.state.fl.us.

Sincerely,

Russell Sullivan
Environmental Manager
Compliance Assurance Program

RS/hp

Enclosures: Inspection Report

c: Lucas Grantham, DEP: Tallahassee, Lucas.Grantham@dep.state.fl.us

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Veolia ES Technical Solutions LLC

On-Site Inspection Start Date: 08/14/2018 **On-Site Inspection End Date:** 08/14/2018

ME ID#: 6716 **EPA ID#:** FL0000207449

Facility Street Address: 342 Marpan Ln, Tallahassee, FL 32305-0904

Contact Mailing Address: 342 Marpan Ln, Tallahassee, FL 32305-0904

County Name: Leon **Contact Phone:** (850) 877-8299

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Transfer Facility facility
Routine Inspection for Universal Waste Transporter facility
Routine Inspection for LQG (>1000 kg/month) facility
Routine Inspection for TSD Facility facility
Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Heather A Perkins, Environmental Specialist
Other Participants:	Lucas Grantham, Environmental Specialist; Matt Melott, Operations Manager; Randy Williams, Operations Supervisor

LATITUDE / LONGITUDE: Lat 30° 21' 51.8486" / Long 84° 16' 8.358"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

A routine inspection was performed at Veolia Environmental Services (Veolia) to ensure compliance with State and Federal hazardous waste and used oil regulations. Veolia was last inspected June 14, 2017 with no violations cited. This facility is a Mercury Reclamation and Recovery Facility located at 342 Marpan Lane in Tallahassee, Florida and has been in operation since 1995. Veolia employs approximately 12 people in the transport and processing of mercury containing lamps and devices, mercury contaminated debris, electronic waste, batteries, scrap metal, and PCB waste. Waste for recycle is picked up in NC, SC, GA, FL, TN, LA, MS, AR and AL and transported to Veolia for processing.

Veolia is a Large Quantity Generator of hazardous waste and a RCRA permitted facility. The current operating permit for Veolia, No. 71455-HO-016, addressed mercury recovery, reclamation and storage and expires September 26, 2021. Veolia's facility located at 1 Eden Lane, Flanders, NJ (NJD080631369) is registered in Florida as a transporter of hazardous waste. The facility located at 342 Marpan Lane registered with the Department as a Hazardous Waste Transfer Facility on July 11, 2007.

Veolia operates a universal waste transfer facility (FLR000124917) at 4972 Woodville Highway, Tallahassee, for the parking of transport vehicles prior to and after unloading at the permitted facility. The transfer yard and permitted facility are located on non-contiguous property in the same industrial park. This facility was not

inspected during this site inspection.

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

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

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

MCMA are recycled through a combination of manual separation followed by retort processing or the articles may be placed directly in the retort oven for processing.

All fluorescent lamp processing equipment, with the exception of the feed belt, is contained within a separate room that is equipped with special air handling systems. The air handling systems maintain a negative air pressure within the room. The HID process is performed within the controlled environment of the HID machine. Some HID lamps due to their construction, are dismantled by hand, however the arc tubes removed from these lamps are fed into the HID machine for crushing. All phases of the separation process are conducted within a negative pressure enclosure. The retorting of mercury containing materials, including phosphor powder, crushed arc tubes and MCMA, occurs in a separate room with its own air handling systems. The systems impart negative pressure to the room to control mercury vapors.

Elemental mercury is recovered from the retort operation and shipped to a mercury refiner/seller. This company may sell the mercury as is or may further refine the mercury and repackage for sale or use in the manufacture of new products.

In addition to the recycling of mercury containing lamps and MCMA, the facility also operates as a handler of other universal wastes and non-RCRA-regulated wastes such as computer equipment and lamp ballasts. The facility also conducts hazardous and nonhazardous waste transporter and transfer activities.

Process Description:

A. Outside North Storage Area two 20-yard roll-offs for collection of processed glass are staged in this area on a concrete pad. An additional two covered 20-yard roll-offs are present in the adjacent asphalt area. This adjacent asphalt paved area is used for collection of cardboard/paper products, wood pallet recycling and various empty container storage. The hazardous waste transfer area is also located here for the overnight holding of transport trucks in the event of an arrival after business hours. The trucks are immediately unloaded during the next business day.

B. Container Storage Areas Veolia has two storage areas designated as "Container Storage Areas One and Two" (CSAs). The CSAs are permitted for up to 27 pallets (108 55-gallon drums) of MCMA; dental amalgam and traps; pre-retort phosphor powder; HID arc tubes; and site-generated hazardous waste (prep room debris and PPE, condensate water, and spent carbon). At the time of this inspection, there were six large Gaylord style boxes that contained sock filter wastes and belting wastes, 8 drums of Ferrous Metals and a spill kit in Storage Area #1. All of these containers were labeled, neatly organized and kept in their assigned storage areas. Additionally, there were 3 Gaylord type boxes of shat-r-shield type bulbs, one cardboard drum of pallet covers, and a black bag of non-RCRA PPE stored in Storage Area #2. All of these containers were labeled, neatly organized and kept in their assigned storage areas.

C. Fluorescent Lamp Processing Fluorescent lamps are staged immediately adjacent to the lamp processing feed belts. Fluorescent lamps are hand fed into the lamp processing room via a conveyor belt. The Fluorescent Lamp Processing Room (labeled as Crush and Separate Room on the Facility Plan), is located in the northwest corner of the facility. It is designed to process approximately 200,000 feet of lamp equivalents per 8-hour shift. Lamps are crushed in a drum crusher and dry-separated into glass, aluminum and phosphor

powder. Phosphor powder is collected by a bag tower and accumulated in 55-gallon drums. There are two processing lines that are used to facilitate this operation. The second processing line is used when there is a need to process a larger volume of materials.
During the inspection the facility had five pallets of RecyclePak® cardboard boxes of varying sizes staged for processing starting in this area and stretching down the aisle space between the Retort Room and Storage Area #3.

D. Loading Dock and Processed Powder Storage The loading and unloading area consists of two trailer docking areas for forklift transfer of materials to/from transport vehicles. Post-retort phosphor powder in 55-gallon drums is accumulated in this area along the east wall prior to off-site shipment for disposal in a Subtitle D landfill. This area is labeled as Storage Area #3 on the Facility Plan that is part of the facility's permit. The permit requires that post-retort phosphor powder be sampled to ensure effective retort processing prior to off-site shipment. During the inspection of the facility, this area contained eight 55-gallon drums of post-retort powder as well as 5 boxes of Retort debris. All of these containers were labeled, neatly organized and kept in their assigned storage areas.

E. Retort Prep Area The retort room, located immediately south of the fluorescent lamp conveyor belts, is an enclosed negative pressure room. The prep area is separated from the retort oven by a roll-up door. The phosphor powder, crushed HID arc tubes, and MCMA's are prepared for the retort oven in the prep area. Drums of crushed HID arc tubes and phosphor powder from the lamp recycling operation have their lids removed in the prep area and are then placed in the retort oven. MCMA are manually disassembled and the liquid mercury is drained and accumulated for sale in the prep area. MCMA components are placed in the retort oven or segregated for off-site recycle/disposal. Manual processing of compact fluorescent lamps is no longer conducted at this Veolia facility. At the time of the inspection materials were being staged in this area as previously described in section C (Fluorescent Lamp Processing).

F. Retort The retort operation is comprised of an oven which is used to heat the mercury containing waste, liberating the mercury vapors which are drawn off the oven with a vacuum pump. The vapors are drawn through a series of heat exchangers in order to condense the vapors back into a liquid mercury state. The liquid mercury is decanted into accumulation containers for sale. This process varies depending on the materials that are going through the retort process. Lamps are on a 24-hour retorting time frame in which the oven bakes the lamp materials at high temperatures (1120 degrees Fahrenheit maximum) then cools down. This process is repeated several times during the 24-hour period.

G. Inbound Universal Waste Storage This area, located on the west side of the southern portion of the building, is the lamp storage area. On the submitted Facility Plan that has been incorporated into the facility permit, this area is labeled as Storage Area #4. The area has a permitted maximum storage capacity of 7,424 cubic feet of mixed fluorescent and HID lamps. The area is used for the temporary storage of universal waste lamps that cannot be immediately processed. These lamps normally consist of HID lamps, U-shaped lamps and other specialty lamps that require manual processing prior to recycling/reclamation. The lamps that require manual processing prior to reclamation are repackaged and sent to the Veolia Port Washington site. The area is also used for the temporary storage of universal waste batteries and non-RCRA hazardous materials.
At the time of this inspection, Storage Area #4 contained one pallet of fluorescent linear tube lights, holding between 42 and 56 lamp recycling boxes. Each of the lamp recycling boxes contained 25 lamps. These have been bound together with plastic stretch wrap to ensure these recycling boxes are easy to move as a singular unit and to keep them inside their assigned storage areas. Also contained in Storage Area #4 were 15 pallets of Gaylord style boxes containing compact fluorescent light (CFL) bulbs. These containers were neatly organized and kept in their assigned storage areas.
Also located at the south of the main facility building (but on the east wall) is Storage Area #5. Storage Area #5 contained 53 large Gaylord boxes that contained scrap brass, CFLs, and halogen lamps. These Gaylord boxes were neatly organized and kept in their assigned storage areas.
Adjacent to Storage Area #5 is the Satellite Accumulation Area for an aerosol can puncturer.

H. HID Processing HID lamps are processed through a custom built HID machine in the southern end of the main facility building. Veolia previously used a manual process in conjunction with the automated process but that has been discontinued. The HID lamp machine is comprised of conveyor belts, crushers, magnets and air pollution control equipment. It is enclosed and under negative pressure. It uses an automated process to dry-separate outer glass, metal bases and support wires from the arc tubes. The arc tubes are crushed and dropped into 55-gallon drums for further processing in the retort room. The remaining components are

dropped into collection containers for recycle/disposal. The drums of crushed arc tubes are managed as SSA containers and moved to the CSA at the north end of the building within three days. The automatic feeder/conveyor has been reduced to allow for more area to stage the HID lamps for processing. A new conveyor belts has been used to help facilitate the increased processing of the HID lamps.
Since the last facility inspection, the facility has removed its maintenance area/cage from this area and now uses the former location as an extension of Storage Area #5 (as previously described).

I. South Building Battery, Container and E-Waste Storage The building is immediately south of the main building and is divided into two large storage areas. The Container storage area is used to hold empty fiber drums and cardboard boxes. Additionally, this area is now the location where the Maintenance Cage has been relocated to from its previous location adjacent to Storage Area #5. No universal or hazardous wastes are stored in this area. The second room in this building is used for the storage of e-waste and battery storage. The space is permitted to store up to 72 pallets. At the time of the inspection, all pallets were properly labeled and protected from the environment. The battery sorting table is still in use to help in sorting the various battery types received by the facility.

J. Records Veolia maintains records including: Inbound/Outbound hazardous waste manifests or shipping documentation, Monthly Mercury Reclamation Rate Samples, Weekly Hazardous Waste Storage Inspections, Weekly Process Operation Inspections, Personnel Training Records, Weekly Composite Samples, Weekly Safety Inspections, and the Contingency Plan. These were all made available for review during the inspection. The records were reviewed for Calendar Years 2017 and 2018, with no discrepancies noted. The Contingency Plan has been kept up to date with the most recent facility permit.

PHOTO ATTACHMENTS:

Loading Dock



Can Puncturer



HID Processing



Outside Storage



Lamp Processing



Storage Area 1



Storage Area 3



Storage Area 5



Veolia



Outside Storage



E-Waste



Lamp Queue



Retort



Storage Area 2



Storage Area 4



Conclusion:

The facility appeared to be in compliance with State and Federal hazardous waste regulations at the conclusion of the inspection.

1.0 - Pre-Inspection 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.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✔		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✔
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✔		

4.0 - Large 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
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.18(a)	✓		
4.3	Are any hazardous wastes treated or disposed of on site? 268.7(a)(5), 62-730.240(1)			
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5)			✓
Item No.	**Land Disposal Restrictions**	**Yes**	**No**	**N/A**
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.6	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)			
4.7	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)	✓		
4.8	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)	✓		
4.9	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)	✓		
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)	✓		
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)	✓		
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	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)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)	✓		
4.15	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)			✓
4.16	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)			✓
4.17	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)			✓
4.18	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)	✓		
4.19	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
4.20	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)			✓
Item No.	**The Manifest**	**Yes**	**No**	**N/A**
4.21	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 ☐ 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 No.	The Manifest	Yes	No	N/A
	☐ 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 (On returned copies only) ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✓		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
4.25	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)	✓		
4.26	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)			✓
4.27	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?			✓
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)	✓		
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.33	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
4.34	If YES, did the generator meet the requirements of 262.23(f)			✓
Item No.	**Pre Transport Requirements**	**Yes**	**No**	**N/A**
4.35	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	✓		
4.36	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	✓		
4.37	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)	✓		
4.38	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) 262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?	✓		

Item No.	Pre Transport Requirements	Yes	No	N/A
4.39	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**
4.40	Does the facility accumulate hazardous waste on-site prior to treatment or disposal?			
4.41	If YES identify applicable accumulation units: ☐ Containers - Complete Container Checklist also CC as applicable ☐ Tanks - Complete Tanks Checklist also AA, BB, and CC, as applicable ☐ Drip Pads - Complete Drip Pad Checklist ☐ Containment Buildings - Complete Containment Buildings Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.17(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 262.17(a)(8)(iii)? 262.17(a)(8)(iii)			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 262.17(a)(8)(iii)? 262.17(a)(8)(iii)			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.17(a)(5)(i)(C)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.17(a)(5)(i)(C)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)	✓		
4.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(2)	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)	✓		
4.54	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)	✓		
4.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? (If No, mark all items below as N/A.)			
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.17(a)(5)(i)(C)			✓
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			✓
Item No.	**Use and Management of Containers**	**Yes**	**No**	**N/A**
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.17(a)(1)(ii)	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.17(a)(1)(iii)	✓		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.17(a)(1)(iv)(A)	✓		
4.61	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? 262.17(a)(1)(iv)(B)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.17(a)(1)(v)	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(3)	✓		
4.64	This should include at a minimum: (Check items below that are not in compliance) ☐ 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			

Item No.	Use and Management of Containers	Yes	No	N/A
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 262.17(a)(1)(vi)(A)	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(A)			✓
4.67	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 265.17(b)? 262.17(a)(1)(vii)(B)	✓		
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.17(a)(1)(vii)(C)	✓		
Item No.	Personnel Training	Yes	No	N/A
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 262.17(a)(7)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 262.17(a)(7)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 262.17(a)(7)	✓		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 262.17(a)(7)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 262.17(a)(7)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 262.17(a)(7)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 262.17(a)(7)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 262.17(a)(7)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 262.17(a)(7)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 262.17(a)(7)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 262.17(a)(7)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 262.17(a)(7)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 262.17(a)(7)	✓		
Item No.	Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 262.251	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 262.252(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.252(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 262.252(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 262.252(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 262.253	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 262.254(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 262.254(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 262.255	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 262.256(a)(2)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 262.256(a)(3)	✓		
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 262.256(a)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 262.256(a)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 262.256(b)	✓		

Item No.	Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 262.260(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 262.260(b)	✓		
4.98	Does the contingency plan describe actions to be taken in response to the following:262.261(a)			
4.99	Fires? 262.261(a)	✓		
4.100	Explosions? 262.261(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 262.261(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 262.261(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 262.261(c)	✓		
4.104	Does the plan list names and emergency phone numbers of emergency coordinator(s)? 262.261(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 262.261(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 262.261(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 262.261(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 262.262	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 262.262(a)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 262.263	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 262.264	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 262.265? 262.265			✓
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 262.265(c)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.11(f)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		
4.117	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
4.118	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)			✓
4.119	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

6.0 - Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓

Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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.

Heather A Perkins	Environmental Specialist	
Principal Inspector Name	**Principal Inspector Title**	
	DEP	09/04/2018
Principal Inspector Signature	**Organization**	**Date**

Lucas Grantham	Environmental Specialist
Inspector Name	**Inspector Title**
	DEP
	Organization

Matt Melott	Operations Manager
Representative Name	**Representative Title**
	Veolia
	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.

Randy Williams	Operations Supervisor
Representative Name	**Representative Title**
	Veolia
	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: Russell G Sullivan **Inspection Approval Date:** 09/04/2018