



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Electrical Engineering Enterprises Inc

On-Site Inspection Start Date: 11/26/2018 **On-Site Inspection End Date:** 11/26/2018

ME ID#: 116885 **EPA ID#:** FLR000215376

Facility Street Address: 5316 E Henry Ave, Tampa, FL 33610-4843

Contact Mailing Address: 5316 E Henry Ave, Tampa, FL 33610

County Name: Hillsborough **Contact Phone:** (813) 740-9601

NOTIFIED AS:

Non-Handler

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon Lenhart, Inspector

Other Participants: Abigail Bridges, Environmental Specialist; Elizabeth Knauss, Environmental Consultant; Wayne Ellis

LATITUDE / LONGITUDE: Lat 28° 0' .4819" / Long 82° 23' 46.8424"

SIC CODE: 1711 - Construction - plumbing, heating, air conditioning

TYPE OF OWNERSHIP: Private

Introduction:

Electrical Engineering Enterprises, Inc. (Facility) was inspected on November 26, 2018 to evaluate its compliance with state and federal hazardous waste and used oil regulations. As of April 2018, this facility is a used oil transporter, and is currently notified as a nonhandler of hazardous waste. This was confirmed during the inspection. The facility process has not changed; see the December 2015 and March 2016 inspection reports for additional information. The inspectors were accompanied throughout the inspection by Wayne Ellis, President.

Process Description:

Electrical Engineering Enterprises, Inc. primarily performs testing of electrical equipment, including transformers, and is also an electrical and power line contractor. Most work is performed in the field, although some panels or other parts may be assembled at the facility. No painting is performed. The facility includes a building with offices in the front, and the back part of the building is an open shop with a parts warehouse and a loading dock bay within the east side of the building. The bay is used to store used oil. There is also a small yard for storage. Currently, there are approximately 50 employees, and the facility is on Tampa water and sewer systems. The facility has been operating at this location since approximately 2012.

Occasionally, used oil is brought back to the facility to be temporarily stored in tote containers within the loading dock bay; the facility generates the majority of its used oil from off site repair, removal and maintenance of transformers. Sometimes, arrangements are made to have the used transformer oil picked up directly from the work site, usually by Clean Harbors, but other times it is brought back and placed in a 6,000-gallon double-walled tanker trailer located off site at Stepp's Towing because there isn't adequate space available at the Electrical Engineering facility. Electrical Engineering has an agreement with Stepp's Towing, and discussions during the inspection indicate that the tanker trailer meets the definition of a mobile tank and is therefore not regulated under the Above-ground Storage Tank ("AST") Systems Rule (62-762, Florida

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Administrative Code). The Stepp's facility was not inspected.

The loading dock is used to store 300 gallon totes of used transformer oil, both mineral oil and a vegetable ester based oil, FR3. The totes were closed, but not all were labeled with the words "used oil." Documentation of corrective action was received via email on December 14, 2018. The loading dock floor slopes to the rear, and there is a sealed berm across the front to provide secondary containment.

Various parts and equipment are stored within the shop area including two natural gas powered forklifts serviced by Briggs, as well as several drums containing generic trash materials.

An asphalt lot, located on the southwest corner of the property, is used to stage and disassemble retired light fixtures, which are acquired through off-site renovation projects being performed by EEE. EEE removes the entire lighting fixture from the renovation job site. The fixtures house high intensity discharge (HID) lamps and fluorescent lamps, which are then dismantled, resulting in recycling of the metals, electronics, and spent lamps. At the time of inspection, containers containing spent mercury-containing bulbs were not properly closed or labeled. A stencil with the appropriate label was provided to the facility, and the Department received documentation of corrective action via email on December 14, 2018 and December 20, 2018.

EEE does not work on transformers containing polychlorinated biphenyls (PCBs) and therefore obtains a sample of transformer oil before any work is performed and has it analyzed for PCBs. The only exception would be for a piece of equipment that has a current analysis and certification. If the job is for a retrofitted transformer (i.e., it formerly contained PCB oil), samples are obtained to ensure no PCBs have leached from the equipment into the mineral oil. Samples are analyzed by Weidmann Electric or T & R Electric. EEE subcontracts TCI to handle any transformer oil that contains PCBs above the regulatory limit. Electrical Engineering only transports from the job site to either their own facility or the 6,000-gallon double-walled tanker trailer located at Stepp's Towing.

At the time of inspection, the facility was unable to provide used oil transporter training records. Immediately following this inspection, the Department electronically provided used oil transporter training presentations and information. EEE electronically submitted the required employee training certificates on December 14, 2018.

The facility submitted its most recent State of Florida Certificate of Liability Insurance to the Department on 3/26/18. Used oil is transported from Electrical Engineering by Clean Harbors, Tucker, GA either directly from the job site or from the tanker trailer at Stepp's Towing.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	No person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil." At the time of inspection, various totes containing used oil were not properly labeled with the words "used oil."
Corrective Action:	CORRECTED: Facility must ensure that all totes containing used oil are properly labeled with the words "used oil." On December 14, 2018, photo documentation of the corrective action was received via email.

Photo Attachments:

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Unlabeled used oil totes



Properly labeled used oil totes



Type: Violation

Rule: 62-710.600(2)(b)

Explanation: Used oil transporters must show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a certification that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, and has an annual and new employees a training program in place covering the applicable rules. At the time of inspection, documentation of training records and training certifications were not available upon request.

Corrective Action: CORRECTED: Facility must provide documentation of the transporter's used oil training certifications. Documentation of the corrective action was received via email on December 14, 2018.

Photo Attachments:

Documentation of used oil transportation training

Electrical Engineering Enterprises, Inc.
Equal Opportunity Employer

USED OIL TRANSPORTATION
TRAINING

DATE: 12-6-18 MONTH: DECEMBER TIME: 12:00 PM
LOCATION: Electrical Engineering Enterprises COMPANY: EEE Inc.

NAME	SIGNATURE
1. Anthony Alford	<i>Anthony Alford</i>
2. Fred Wilson	<i>Fred Wilson</i>
3. Don Sisk	<i>Don Sisk</i>
4. Anthony Alford	<i>Anthony Alford</i>
5. Mike Ruckling	<i>Mike Ruckling</i>
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Phone: (813) 766-9800 • Fax: (813) 766-9801 • Email: EEE@EEE-INC.COM

Type: Violation

Rule: 62-737.400(5)(a), 62-737.400(5)(b)

Explanation: (a) Spent universal waste lamps must be in closed containers. At the time of inspection, spent mercury-containing lamps were located in open containers.

(b) Each lamp or container in which lamps are contained must be clearly labeled or marked with "universal waste lamps" or "waste lamps" or "used lamps." At the time of inspection, spent mercury-containing lamps were not placed in properly labeled containers.

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Corrective Action: CORRECTED: Facility must provide photo documentation of the properly closed, labeled containers. Photo documentation of the corrective action was received via email on December 14, 2018 and December 20, 2018.

Photo Attachments:

Properly labeled drum containing spent mercury-containing bulbs



Conclusion:

Based on the observations made at the time of this inspection, the facility was not operating in compliance with state and federal hazardous waste rules* and regulations applicable to used oil handlers. However, corrective actions were taken following the inspection and the facility has since returned to compliance.

*Please note that Florida adopted the Generator Improvements Rule on June 18, 2018

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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			✓

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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.

Shannon Lenhart

Principal Inspector Name

Inspector

Principal Inspector Title

a/s/o Shannon Kennedy

Principal Inspector Signature

FDEP-SWD

Organization

12/26/2018

Date

Abigail Bridges

Inspector Name

Environmental Specialist

Inspector Title

FDEP-SWD

Organization

Elizabeth Knauss

Inspector Name

Environmental Consultant

Inspector Title

FDEP-SWD

Organization

Wayne Ellis

Representative Name

Electrical Engineering Enterprises, Inc

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:

12/26/2018