RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653
Alachua County

EPA ID No.: FLD980711071

3) Responsible Official

Raymond Whittle, General Manager
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653

4) Inspection Participants

Raymond Whittle	Perma-Fix of Florida, Inc.
Randy Self	Perma-Fix of Florida, Inc.
Dwayne Singleton	Perma-Fix of Florida, Inc.
Cheryl Mitchell	FDEP Northeast District
Tori Goodwin	FDEP Northeast District
Héctor M. Danois	US EPA Region 4

5) Date and Time of Inspection

February 5, 2018 at 8:30 a.m. EDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Chapter 403 of the Florida Statutes (Fla. Stat.), Fla. Stat. §§ 403.702 et seq.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rule 62-730 et seq. of the Fla. Admin. Code Ann. RCRA/HSWA permit number: 17680-011-HO, effective May 27, 2015.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Perma-Fix of Florida, Inc. with the applicable regulations.

8) Facility Description

Perma-Fix of Florida, Inc. (hereinafter known as "the facility" or "Perma-Fix") is registered as a transporter as well as a storage and disposal facility (TSD) of hazardous waste. Processes performed at the facility include liquid and sludge bulking, scintillation vial and other small container crushing, shredding and repackaging operations of hazardous waste received from off-site. Additional operations performed include thermal desorption and/or chemical oxidation, used oil handling, contact petroleum transport and consolidation and storage of discarded devices containing mercury.

On May 27, 2015, FDEP issued a RCRA/HSWA permit 17680-011-HO for the operation of a hazardous waste treatment and storage facility. In addition, Perma-Fix is a large quantity generator (LQG) of hazardous waste, a used oil / used oil filter transporter and transfer facility, a universal waste (lamps, batteries, devices, pharmaceuticals) transporter and transfer facility, and a used oil marketer. The facility's processes include liquid and sludge bulking.

Perma-Fix has been in this location since 1983, is located on 7 acres and has a staff of 42 employees working 5 days a week.

9) Previous Inspection History

On March 3, 2015, FDEP and the EPA conducted a CEI at the facility and no RCRA violations were discovered.

10) Findings

Upon arriving at the facility, the inspectors entered the main office and were escorted to the conference room. Mr. Whittle, Mr. Singleton and Mr. Self, met with the inspectors. The inspectors presented their credentials. At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the FDEP and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection at the facility. The following is a description of the observations made during the walk-through.

Liquid Scintillation Vials (LSV) process

LSV fluids are generally used by hospitals and research institutes as tracer fluids. The LSV treatment process is to place the vials on a vibratory conveyor that separates packing material from the vials, then moves the vials into a crusher where the fluids are separated from the crushed vials. The crushed vials are rinsed with ethanol, the fluids and rinse water are collected in a storage tank and the crushed vials are transferred to a 55-gallon drum. LSF is screened for radioactivity and pumped into tanks and sent off-site to Diversified Scientific Services Inc.(DSSI), a Perma-Fix subsidiary located in Tennessee, for further treatment as mixed waste or radioactive waste as appropriate. The crushed, triple rinsed glass/plastic is screened for radioactivity and disposed of as non-hazardous waste, if it is not radioactive. The scintillation fluids have traceable amounts of radiation because of exposure to a radiation source (C-14 and tritium) and contain small amounts of solvents (xylene and toluene). At the time of inspection, the LSV processing unit

was not in operation. The facility typically processes 200-300 drums every two months.

Radiation Chemistry Lab

Perma-Fix screens incoming LSV and scintillation fluids in this lab. The process generates wipes and vials that are accumulated in satellite accumulation containers. At the time of the inspection, the lab had a satellite accumulation area (SAA) storing a 15-gallon container of mixed waste only, a 15-gallon container of lab trash and a 15-gallon container of exempt vials (not radioactive). All containers were closed and properly labeled.

Waste Storage Warehouse (WSW)

This storage area in the building is permitted to store up to 54,340 gallons of hazardous waste with a maximum container size of 718 gallons or B25 box. The area is under a roof on a curbed concrete pad. This area was within its permitted volume capacity and all containers had been accumulating for less than one year, as documented in the facility's electronic inventory system. At the time of the inspection, the inspection team noticed two palettes totes storing what appeared to be paint from household collection events. The plastic liner inside the tote was damaged and had the contents leaking outside the tote (See Figure 1).

Pursuant to RCRA Permit 17680-011-HO, Part II Subpart B.2.1.- Container Storage Areas/Unit, the Permittee is allowed to store the wastes listed in Attachment A of this permit only in the Processing and Storage Building (PSB), Treatment and Operations Building (TOB), and in the Liquid Scintillation Vial (LSV) Processing and Waste Storage Warehouse. Containers must conform to D.O.T. requirements. If a container holding hazardous waste is not in good condition, or begins to leak, the waste shall be transferred to another container that is in good condition [40 C.F.R. § 264.171] or it will be over-packed. Containers shall be kept closed, except when adding or removing waste and be handled in a manner that will not allow the containers to rupture or leak [40 C.F.R. § 264.173].

In addition, the inspection team found a box of universal waste lamp that was not closed (See Figure 2). As well, some boxes were not labeled with the words "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to Fla. Admin. Code Ann. r. 62-737.200(31)(b) [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant Fla. Admin. Code Ann. r. 62-737.400(5) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-737.400(5)(b)1. [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Outside the Waste Storage Area

At the time of the inspection, Perma-Fix was storing B25 boxes, 1-cubic yard super-packs and shipping trailers. The B25 boxes were storing radioactive debris, the super-packs were storing petroleum oil solids and the trailers were empty.

Processing and Storage Building (PSB)

This storage area is permitted to store up to 72,105 gallons of hazardous waste with a maximum container size of 718 gallons or a B25 container. The area is under a roof with open sides, containment system and concrete curbing with three different zones for storage of waste. In this area, Perma-Fix conducts fuel-blending (phase separation treatment, decanting and bulking of wastes), lab-pack decommissioning and bulking of chemotherapy and pharmaceutical wastes. Additionally, a 3,000-gallon above ground storage tank is located is this area. The tank has not been used to store any waste since it was installed.

At the time of the inspection, this storage area appeared to be within its permitted volume capacity and all containers had been accumulating for less than one year. The inspection team, noticed a pallet of drums was on top of the secondary containment trench drain located on the concrete ramp. The facility personnel moved the pallet before the end of the day.

Pursuant to RCRA Permit 17680-011-HO, Part II Subpart B.2.9.- Container Storage Areas/Unit, the Permittee shall keep all containers and associated equipment used for the fuel blending and phase separation activities inside the secondary containment area of the PSB.

Outside Areas

The paved areas outside the storage area and building are used to stage nonhazardous crushed LSV waste, non-hazardous bulked solid waste and trailers to store material/equipment. The containers observed in these areas were closed and properly labeled.

Security Fence

The security fence was inspected and was in good repair with adequate signage posted on the fence surrounding the facility.

Treatment and Operations Building (TOB)

This is where Perma-Fix has a waste storage area, a thermal desorption, and chemical treatment and chemical lab. Exhaust and fugitive emissions from treatment operations within the TOB must be treated through an air pollution control system consisting of a regenerative thermal oxidizer (RTO)/HEPA filter system.

Waste Storage Area

This storage area has seven zones for different types/classifications of wastes, and it is permitted to store up to 35,200 gallons of hazardous waste with a maximum container size of 718 gallons, that is equivalent to a B25 box container. At the time of the inspection, this area appeared to be within its permitted volume capacity and all containers had been accumulating for less than one. The inspection team, noticed a pallet of

drums and two stacked B25 boxes were on top of the concrete secondary curb. The facility personnel moved the pallet before the end of the day.

Radiological Archive Area

A portion of the Waste Storage Area is used as an archive storage area for radiological screening samples. The samples are archived pending review of test reports, treatability studies or for other forensic reasons specific to the generator of the waste. The archive area is purged of samples that are no longer required, and have the potential to generate mixed waste. The inspection team didn't have access to the 90-day storage area on a mezzanine where the containers are stored because of the radiological levels. The facility personnel use a crane-lift to inspected the area to conduct weekly inspections.

90-day Storage Area Outside the Lab

Three 55-gallon drums were located in this 90-day storage area. The hazardous waste comes from the SAA containers inside the lab. The drums were stored on pallets, were closed, labeled and dated (oldest 11/29/17). At the time of the inspection, the inspection team noticed residue on top of the lid of the 55-gallon drum storing sulfuric acid (See Figure 3). The facility personnel removed the residue and properly containerized the waste debris before the inspectors left the area.

Pursuant to [Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a) (2016)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a large quantity generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722] [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(1)-(4) (2016)] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(a)(1)(i) (2016)], which incorporates Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 265.171], and is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements.

The Chemical Lab

The facility conducts fingerprint analyses (water content, specific gravity, pH and flashpoint) on incoming wastes to confirm the generators waste profile. From these operations, the lab generates waste acid, solvents, solid debris (vials, wipes), and radioactive and mixed wastes. The waste is accumulated in a number of SAAs. At the time of the inspection, at the Lab Instrument 1C, the inspection team found an open 5-gallon container storing lab instrument waste (See Figure 4).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(c)(1) (2016)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34 (a) (2016)],

provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34 (c)(i)-(ii) (2016)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.34(c)(1)(i) (2016)], which incorporates Fla. Admin. Code Ann. r. 62-730.180(2) [40 C.F.R. § 265.173(a)], and is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed when waste is not being added or removed.

Recordkeeping

After the walkthrough, the inspectors requested the following records: manifests (2017-2018), training records (2017), the contingency plan (2015), final permit, inspection logs (2017-2018), position descriptions, closure plan, copy of the most recent insurance certificate, financial assurance certificate updates, liability insurance, container inventories, transporter certifications and spill response procedures that are carried in transport vehicles. The final permit was issued on May 27, 2015, expiring June 8, 2020.

11) Summary

On February 5, 2018, the inspectors conducted the exit meeting with Mr. Whittle, Mr. Singleton, and Mr. Self. During this meeting, the EPA and FDEP presented the preliminary results of the inspection. Perma-Fix was inspected as a treatment, storage and disposal facility and large quantity generator of hazardous waste. At the time of the inspection, the inspection team indicated that potential deficiencies of RCRA were discovered during the inspection.

12) List of Appendices

Appendix 1 – Photo Log

13) Signed

Héctor M. Danois
Environmental Engineer

4/9/18
Date

Concurrence

Alan A. Annicella
Chief, Hazardous Waste Enforcement
and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

4/9/18
Date

Appendix 1 – Photo Log

Photographs taken February 5, 2018
by Héctor M. Danois
Samsung WB250F #S75914

Figure 1 - Leaking tote storing paint waste. Waste Storage Area. Photo taken 2/5/18

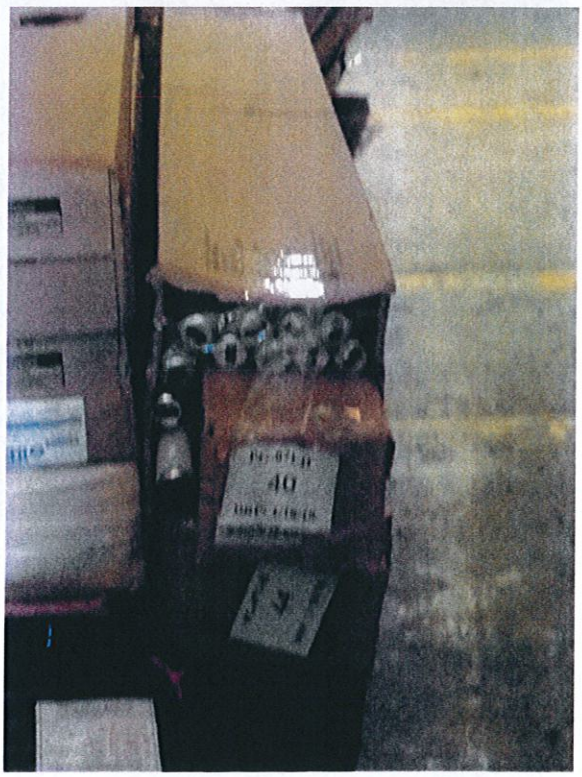

Figure 2 - Open box of universal waste lamps. Waste Storage Area. Photo taken on 2/5/18

Figure 3 - 55-gallon drum with waste reside on top. Drum located at the TOB. Photo taken on 2/5/18

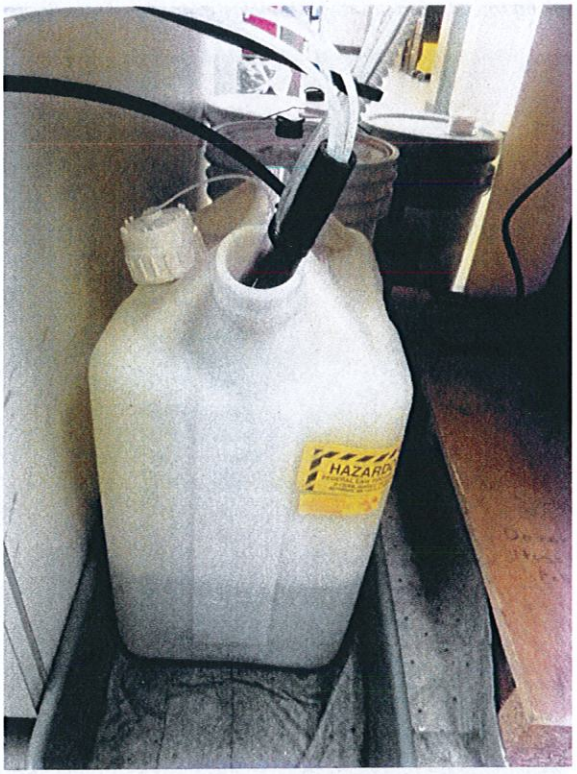

Figure 4 - Open 5-gallon SAA container. Lab Room 1C. Photo taken on 2/5/18f