



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
(813) 470-5700

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

MEETING AGENDA

ORGANIZER: Kelly Honey, Environmental Specialist III
SUBJECT: EQ Florida, Inc. (FLD981932494); inspection of 08-14-15
DATE: November 20, 2015

1. Introductions
 - a. District
 - b. EQ Florida, Inc.
 - c. Tallahassee
2. EQ's written response to the inspection report
 - a. Item by item review
 - i. EQ comments
 - ii. Department comments
3. EQ's response #15 (indicated as "OPEN" on the written response)
 - a. EQ's response
 - b. Department comments
4. Open Discussion
5. Closing remarks
 - a. Copies of Attendance Record
 - b. Any general comments
 - c. Possibility of additional meetings

2. Container must be marked prior to adding waste to the container

Argue that we are very unnecessary ~~indul~~ because the water in that tote would have been added to the ~~the~~ ^{the} Waste processing tank once the rain water had all been collected - it would never be "stored" in the tote.

3. Training - ^{Citation} they agree ~~that~~ that they do ~~have~~ adequate training but do agree that on-going training is needed. Have made changes to the monthly inspection forms.

Who ever is on site 20-60 people.

They have a weekly "Safety" meeting on Fridays that deals w/ Safety as well as regulatory issues.

4. Operate with the 10 days. The Trailers stay there on the north side until they are loaded, ^(3-4 days) then the trailer is moved into ~~the~~ ^{the} containment on the south side, call the transporter and it may take a couple of days

for the transporter to get ~~the~~ there to move the trailer. They have a vested interest in getting the load down the road - don't get paid until the waste reaches its destination. Can't recognize the profit until it ~~gets to its destination~~ ~~gets to its destination~~.

Outbound bulk - typically solids - very little liquid. If we liquid - then in only a couple of days.

We would like to have the specification on the contaminants. & Specs on the tape used for repairs.

May be able to drop this violation.

5. Keyman is ok - resolved.
CSX ^{Violation} ~~standards~~ stands.

6. Inspectors of the Reg. Waste Treatment tank. The Reg. Waste Treatment Unit was in the Solid waste inspection log. - oo was provided

But the firm must make sure that all the individual components are inspected. This must include the dump in the floor on the south side of the building.

Plan on putting in a curb to isolate the solid waste side from the liquid waste side in the stormwater on the north (solid waste side) is separate & if it gets

7 & 8 - Agree to these
 Fix with tape or replace
 Physcol - inspect each time the containers are changed out.

9. Inspector Log.

Revised form has been submitted.
 They were not using the form approved in the ~~per~~ permit.

10 & 11 - Detailed previously.

12. Doing the proper ~~labeling~~ labeling now

Permit modification & fee coming soon.

13. SWMU #11 10-Day transfer area
 Transfer & storage area

Issue of being over the allowed storage capacity.

This issue will hopefully be addressed with the permit modification.

14. Already discussed. - will sample the stormwater

15. Understand that they have 5 days to unload incoming waste - they had a lot of issues with the receipt ~~of~~ back in May.

They did miss the 5 day timeframe.

★ Need to include language in the Permit Modification to deal with low incoming ^{Haz. Waste} bulk liquids will be managed & stored.

Batch 43

Day out on the 27th

This batch needed to be treated 4 times before they got a passing test.

Problem with Florida since the waste is inconsistent variable.

sample to lab.

3pm on cut off for analysis -

Samples collected & sent on Monday after 3pm



Keyman manifest provided



Treatment + storage area = the building

Don't want to see a retrieval batch being delayed w/ additional treatments/batches - need to be put back into the treatment tank as soon as possible.



Batch 101 - dug out on ~~the~~ 9/14
the people COC states the people was collected on 9/15 - was ~~probably~~ probably collected on ~~the~~ 9/14 - the COC must ~~also~~ accurately reflect the sample date & have the signature of the sampler.

16. Procedures have been changed as needed. Wastes destined for treatment will be properly reflected on the Haz. Manifest.

Solid Waste

1. They agreed with us: Would need to provide leachate control to stores in bound solid waste. Different requirements for storage of solid waste in

vehicles.

2. Cross contamination of the equipment for the ~~solid waste~~ ^{solid waste} ~~to solid waste~~ treatment tanks/cells.

Will update the ~~to~~ ^{new} ~~process~~ procedure in the permit modification.

2 excavators will not safely fit - will modify the drawing to show that only one excavator is present.

"Staging" vs "Storage"

Need to have new areas designated for the Transfer area with a specific capacity (Transfer area for both in bound & out bound) & determine the capacity needed for the treated haz. waste roll offs.

Will need to increase the financial assurance due to the increase capacity of the facility.

Need to consider if the increase facility capacity is a substantial change.



7202 East 8th Avenue, Tampa, FL 33619
P 813.319.3400 F 813.628.0842

November 18, 2015

Ms. Mary Yeargan, P.G.
Southwest District
Florida Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Warning Letter #WL15-024HW29SWD
EQ Florida, Inc.
Facility ID No. FLD981932494
Hillsborough County

Dear Ms. Yeargan:

In response to your letter dated October 22, 2015 concerning the hazardous and solid waste compliance inspection conducted at EQ Florida, Inc. on August 14, 2015, EQ Florida, Inc. is submitting for your review a detailed response that will help the Department determine potential violations. An additional response may be submitted for your review as a result of the November 20, 2015 meeting with the Department.

EQ Florida, Inc. intends to fully cooperate with the Department's investigation and looks forward to resolving the matter as quickly as possible.

If you have any comments or questions concerning this matter, please call me at 813-319-3423 or e-mail me at stuart.stapleton@usecology.com.

Sincerely,

Stuart Stapleton

Stuart Stapleton
EHS Manger
EQ Florida, Inc.

Cc: Melissa Madden, Engineering Specialist III, FDEP (melissa.madden@dep.state.fl.us)
Kelly Honey, Environmental Specialist III, FDEP (kelly.honey@dep.state.fl.us)
Steve Morgan, Environmental Engineer, FDEP (steve.morgan@dep.state.fl.us)
Carrie Kruchell, PG, Professional Geologist II, FDEP (carrie.kruchell@dep.state.fl.us)
Gene Cieply, General Manager, EQ Florida, Inc. (gene.cieply@usecology.com)

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Overview

1. Rainwater management in the Waste Processing Building. Rainwater that blows into the building is collected, temporarily containerized and placed into the hazardous waste treatment tank along with other hazardous waste for treatment. It was determined that handling the water in this manner is a Best Management Practice (BMP) and all collected water, from both the North (non-hazardous) side and the South (hazardous) side is collected and handled in a similar manner. Non-hazardous waste located on the North side of the building is stored in closed containers in order to prevent spills and possible contamination of rainwater and do not pose a Universal Treatment Standard (UTS) risk. Furthermore, any de minimis spills that may occur are cleaned up in a timely manner further reducing the risk of any possible contamination of collected rainwater.
2. The 10-Day Transfer Facility & Solid Waste Management Unit (SWMU) #11. The 10-day transfer facility, SWMU #11, is identified in both the application (Attachment D) and the permit (Appendix A) as such. Figure 16 of the application delineates the "Transfer & Staging Area" boundaries on the 8th Avenue property. Figure 17 of the application indicates that SWMU #11 is located within the "Transfer & Staging Area" boundary. At the time of the inspection, there was not any material in the 10-day transfer facility.
3. Manifest Completion. Manifest deficiencies are noted on the manifest as required. During the inspection a discrepancy that should have been identified on the manifest was not correctly indicated on the manifest. Management codes are assigned and indicated on the manifest and revised according to business decisions.
4. Facility Inspections. Facility inspections are completed as required. Document Control issues have been corrected and a revised inspection log has been submitted for inclusion in the permit application.
5. Permit Modification. A modification to the Hazardous Waste Operating Permit (34875-HO-011) is being prepared for submission. The modification request is necessary due to the unexpected amount of material being processed thru the facility and the need for additional storage capacity. The permit modification will operationally address the items noted in the inspection and prevent reoccurrence.

Hazardous Waste Inspection Report Itemized Response

1. **262.34(a)(1)(i)** - At the time of the inspection, facility personnel were actively in the process of collecting and containerizing rainwater that had blown into the building overnight. When the inspection party entered the building, the facility personnel moved to a different area of the Waste Processing Building and continued to actively manage the rainwater collection process by sweeping, squeegeeing, and moving the water for collection and containerization. The container was not left unattended at any time and was not in storage at the time of the inspection. The container remained open because waste was actively being added to the container.

Container closure requirements will be reviewed and included in employee refresher training.

2. **262.34(a)(2), 262.34(a)(3)** - As noted in Item #1, facility personnel were actively managing the collection and containerization of rainwater that had accumulated in the building overnight. At the time of the inspection, the container was not in storage and waste was actively being placed into the container.

Container marking requirements will be reviewed and included in employee refresher training.

3. **264.16(a)(1)** - All EQ Florida personnel receive training in compliance with 40 CFR 264.16 at the time of their hire and on an annual basis thereafter. Regularly conducted safety meetings also reinforce topics that ensure regulatory compliance.

Facility personnel will continue to receive refresher training on an annual basis.

4. **264.175(b)(3)** - Secondary containment is provided for all vehicles loaded with hazardous waste. The secondary containments in use have either a 1,870-gallon or a 4,937-gallon capacity. These containments have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater.

Paperwork completion time varies depending on several factors. Part II, Subpart B, Item #15 of the permit states "Vehicles being loaded for outgoing shipment shall leave the facility within ten (10) calendar days of the first container of hazardous waste being placed on the vehicle." This permit condition allows EQ to properly load and placard the vehicle, prepare the paperwork, and schedule transportation in a timely manner.

A permit modification is being prepared seeking roll-off box storage and will address secondary containment requirements.

5. **264.71(a)(2)** - Facility personnel responsible for receiving waste into the facility have been properly trained on manifest discrepancies and are knowledgeable on this subject matter. This particular manifest discrepancy was not indicated on the manifest due to human error, not because of a lack of training. See Item #3 above.

The Manifest #013981180JJJ discrepancy issue was resolved during the 10/29/2015 meeting with FDEP.

All significant discrepancies will continue to be noted on the manifest. Manifest discrepancy and management code requirements will be reviewed and included in employee refresher training.

6. **403.727(1)(a)** - The hazardous waste treatment tank inspection is being conducted as required by Subpart J and the Permit. Inspection Logs indicating the hazardous waste treatment tank inspection were provided to the FDEP upon request. The Inspection Log was revised over time and the hazardous waste treatment tank inspection portion of the inspection was moved to an additional inspection log. A document control failure occurred and the most current copy of the Inspection Log was not provided to the FDEP for inclusion in the permit application.

The Inspection Log has been revised and clearly identifies and documents the inspection of the treatment tank and associated equipment. The Inspection Log was submitted to the FDEP for inclusion in the permit application on 11/11/2015 and will be included as part of the permit modification.

Inspection Log requirements will be reviewed and included in employee refresher training.

7. **403.727(1)(a)** - EQ Florida strives to repair or replace the containment as necessary to ensure secondary containment is provided.

All secondary containment lacking structural integrity has been replaced.

8. **403.727(1)(a)** - EQ Florida strives to repair or replace the containment as necessary to ensure secondary containment is provided.

In conjunction with the revised Inspection Log, all affected personnel will receive in-depth and detailed refresher inspector training with special emphasis on containment integrity requirements. Containment lacking integrity will be taken out of service until repairs or replacement are completed.

9. **403.727(1)(a)** - See Item #6 above.

The Inspection Log has been revised and clearly identifies and documents the inspection of the treatment tank and associated equipment. The Inspection Log has been submitted to the FDEP for inclusion in the permit application on 11/11/2015 and will be included as part of the permit modification.

Inspection Log requirements will be reviewed and included in employee refresher training.

10. **403.727(1)(a)** - The treatment of unpermitted waste code issue was resolved during the 10/29/2015 meeting with FDEP.

11. **403.727(1)(a)** - The treatment of unpermitted waste code issue was resolved during the 10/29/2015 meeting with FDEP.

12. **403.727(1)(a)** - Roll-offs containing treated (stabilized) waste are classified as hazardous waste until laboratory analytical confirmation proves otherwise. Identification tags are applied to each roll-off box and clearly identify the contents of each roll-off box.

A permit modification is being prepared seeking roll-off box storage and additional capacity.

13. **403.727(1)(a)** - The roll-off boxes identified in the inspection are not in the 10-day transfer facility. SWMU #11 is clearly identified in both the permit and the application as the 10-day transfer facility. The Department's May 29, 2015 letter to EQ Florida, Inc. allows temporary staging in the same location as SWMU #11 location. Material that has

been processed in the treatment tank and is waiting on analytical is not being placed in the 10-day transfer facility (SWMU #11). The 20,000-gallon or 100-cubic yard capacity pertains to the 10-day transfer facility (SWMU #11) and does not apply to other material that may be staged in the same location as SWMU #11.

A permit modification is being prepared seeking roll-off box storage and additional capacity.

14. **403.727(1)(a)** - Collected stormwater will be sampled and characterized prior to disposal.
15. **403.727(1)(a)** – OPEN. To be discussed at the November 20, 2015 meeting.
16. **264.71** - Management Codes are preprinted on the manifest based on predetermined internal treatment groups.

Wastestream management codes have been reviewed and revised accordingly. If a waste stream's management code is changed during receiving, a corrected manifest will be provided to the generator.

Management code requirements will be reviewed and included in employee refresher training.

Solid Waste Inspection Report Itemized Response

1. **62-701.320(1), 403.161** - Only outbound roll-off boxes containing solidified solid waste will be stored in the Solid Waste Operations Area (SWOA). All other solid waste will be stored inside the Waste Processing Building if necessary.
2. **62-701.320(1), 403.161** - The decontamination procedure (Hazardous Stabilization - OPS-OP-071-FLA) for the excavator in the Waste Processing Building includes the following: "The bucket of the excavator must be maintained over the stabilization tank at all times until decontaminated. The bucket must be cleaned before use in the solidification tank for non-regulated waste processing. To be considered "clean" the bucket must be free of residual contaminants on the surface. The use of tools such as a water hose or power washer should be utilized. All such cleaning will occur over the stabilization tank or open decontamination tote to ensure all treated wastes are collected and returned to the stabilization tank."
3. **62-701.710(3)(b)** - There are no plans for any additional building improvements at this time.