UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 27 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raymond Whittle
Vice President, Southeast Operations
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Perma-Fix of Florida, Inc.
EPA I.D. Number FLD980711071

Dear Mr. Whittle:

On November 21, 2019, the U.S. Environmental Protection Agency, along with the Florida Department of Environmental Protection (FDEP) conducted a CEI at Perma-Fix of Florida, Inc. located in Gainesville, Florida to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report which indicates that deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the FDEP for follow-up and further review.

If you have any questions regarding this matter, please contact Daryl R. Himes, of my staff, by phone at (404) 562-8614 or by email at himes.daryl@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

cc: Cheryl Mitchell, FDEP

RCRA Inspection Report

1) Inspector and Author of Report

Daryl R. Himes
Environmental Engineer
US Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8614
email: himes.daryl@epa.gov

2) Facility Information

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

EPA ID. Number FLD980711071

3) Responsible Official

Raymond Whittle
Vice President, Southeast Operations

4) Inspection Participants

Daryl R. Himes, U.S. EPA
Cheryl Mitchel, Florida Department of Environmental Protection (FDEP)
Dan Cain, Perma-Fix of Florida, Inc.
Randy Self, Perma-Fix of Florida, Inc.

5) Date of Inspection

November 21, 2019

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k
Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927
40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

Chapters 403 & 378, F.S., and Chapters 62-710, 62-730, and 62-737 Florida Administrative Code (F.A.C.)

7) Purpose of Inspection

To conduct an unannounced EPA lead inspection to determine the facility's compliance with the applicable RCRA hazardous waste regulations.

8) Facility Description

Perma-Fix of Florida, Inc. (PFF or facility) operates as a large quantity generator, treatment and storage facility of hazardous waste. Processes performed at the facility upon receiving hazardous wastes from off-site facilities include liquid and sludge bulking, scintillation vial and other small container crushing, shredding and repackaging operations. 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.

PFF performs its storage and treatment operations in several container storage areas, one tank and two miscellaneous treatment units. PFF performs its permitted operations under Permit Number 17680-011-HO effective May 27, 2015.

Perma-Fix has operated at this location since 1983, is located on 7 acres and has a staff of approximately 40 people.

All of PFF's operations are performed within a fence with access restricted.

9) Findings

Upon arriving at the facility, EPA credentials were presented to Dan Cain, the facility's Environmental, Health and Safety Manager. The purpose of the inspection and the facility's operations were then discussed.

A walk-through inspection of the facility was then performed with the findings documented below.

Liquid Scintillation Vial (LSV) Processing and Waste Storage Building

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 ethanol and fluids are collected in a storage tank and the crushed vials are transferred to a 55-gallon drum. Scintillation fluid 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 of mixed waste that are accumulated in satellite accumulation containers. At the time of the inspection, the lab had a satellite accumulation area (SAA) storing a 5-gallon container of non-empty glassware, a 5-gallon container of contaminated solids (lab trash) and a 5-gallon container of non-empty glassware exempt vials (not radioactive). All three containers were closed and labeled with the words "Hazardous Waste" and an indication of the hazard contents of the containers (Photos 1 – 3).

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.

Outside 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 (Photo 4).

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.

Two containers of site generated ignitable hazardous wastes with identification codes IND 6692 (Photo 5) and IND 7077 (Photo 6) were observed in this area. The containers were labeled as hazardous waste and marked with an indication of the hazard content of the containers. The containers were not marked with accumulation start dates.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) of non-acute hazardous waste in a calendar month.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG 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. § 262.17] *(hereinafter referred to as the "LQG Permit Exemption").*

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Area Outside of PSB

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. Two 27-cubic foot metal containers of D005/D035 characteristic hazardous waste from Epic Alabama Shipyard were observed in this area without placards indicating the hazard contents of the containers.

Pursuant to Fla. Admin. Code Ann. r. 62-730.183 Part 268.50(a)(2)(i)(C) [40 C.F.R. § 268.50(a)(2)(i)(C) a storage facility must mark or label its containers with an indication of the hazards of the contents.

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

PSB Consolidation Area

Seven 550-gallon stainless steel totes managing ignitable hazardous waste were observed in this area. Each of the containers were labeled with the words "Hazardous Waste" and marked with an identification of the hazard contents of the containers. One of the containers was not marked with a legible accumulation start date (Photo 7).

Pursuant to Fla. Admin. Code Ann. r. 62-730.183 Part 268.50(a)(2)(i)(C) [40 C.F.R. *§ 268.50(a)(2)(i)(D) a storage facility must mark or label its containers with the date that* accumulation begins.

Receiving and Off-Loading Area

Thirty-two 55-gallon containers of hazardous and non-hazardous waste and two 275- gallon totes of hazardous waste were observed in this area. All the containers were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard content of the containers and accumulation start dates.

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.

In an area just outside of the TOB, thirty-seven 55-gallon containers of hazardous and non-hazardous waste and two 275- gallon totes of hazardous waste were observed in this area. All of the containers were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard content of the containers and accumulation start dates.

TOB 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 year.

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 inspect the area to conduct weekly inspections.

90-day Storage Area Outside the Lab

Three 55-gallon drums and one 30-gallon drum were located in this 90-day storage area. Hazardous waste placed in these drums comes from the SAA containers inside the lab. The drums were stored on pallets, were closed, labeled and dated. These containers were not labeled with an indication of the hazard content of the containers.

Pursuant to Fla. Admin. Code Ann. r. 62-730.183 Part 268.50(a)(2)(i)(B) [40 C.F.R. § 268.50(a)(2)(i)(C) a storage facility must mark or label its containers with the applicable hazardous waste content of the containers.

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 was being accumulated in five 15-gallon, two one-gallon and three one-quart containers within a SAA. All of the containers were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard content of the containers.

Recordkeeping

After the walkthrough, the inspectors requested the following records: manifests (2019), training records (2019) and position descriptions, contingency plan, inspection logs (October of 2018 and 2019), closure plan. The final permit was issued on May 27, 2015, expiring June 8, 2020.

During a review of the facility's contingency plan, it was determined that two emergency coordinators (Mike Shuler and Tom McCartt) listed in the plan were no longer employees of PFF since the annual review of the permit.

Pursuant to Fla. Admin. Code Ann. r. 62-730.150(2)(b) [40 C.F.R. § 262.17(a)(6)(D)] a generator of hazardous waste must provide accurate contact information to FDEP.

During a review of the facility's contingency plan it was determined that the facility did not have a quick reference guide as required by the generator improvement rule.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

10) Signed

Alan A. Annicella

for Daryl R. Himes
Environmental Engineer

1/27/2020
Date

11) Concurrence

Alan A. Annicella

Alan Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

1/27/2020
Date

Photographs

Perma-Fix of Florida

Gainesville, Florida

COMPLIANCE EVALUATION INSPECTION PICTURES

FLD980711071

November 21, 2019

Photos taken by Daryl Himes
Camera Type Canon Elph 360 HS

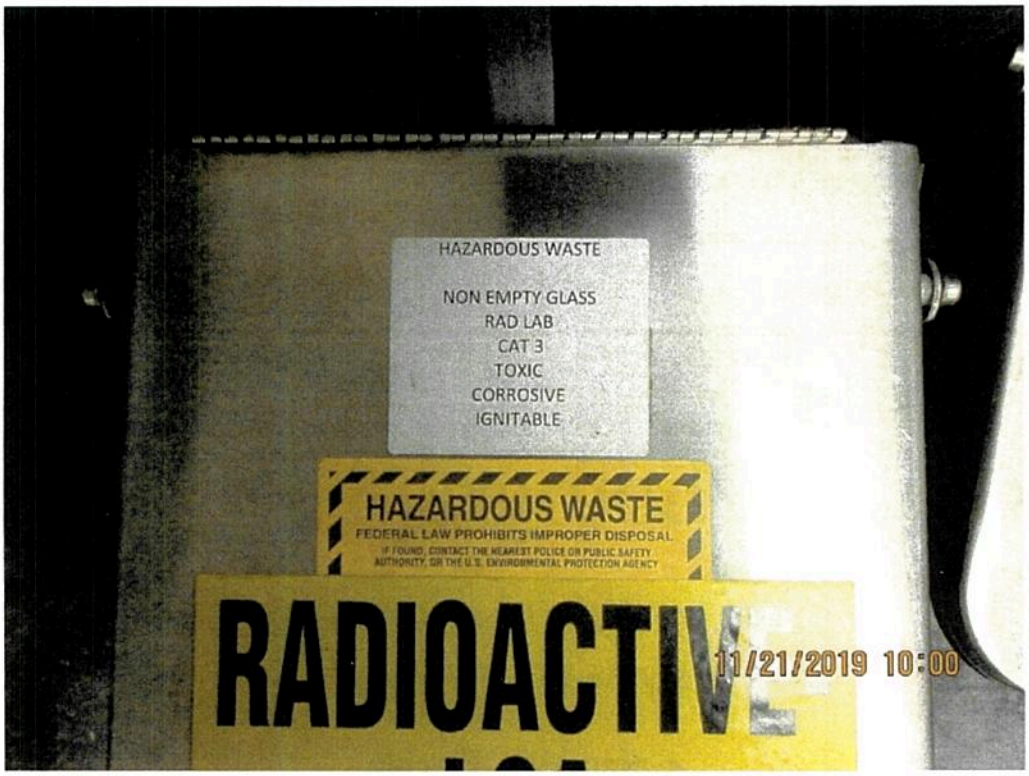

Photo 1 – 5-gallon container of mixed waste in Radiation Chemistry Lab

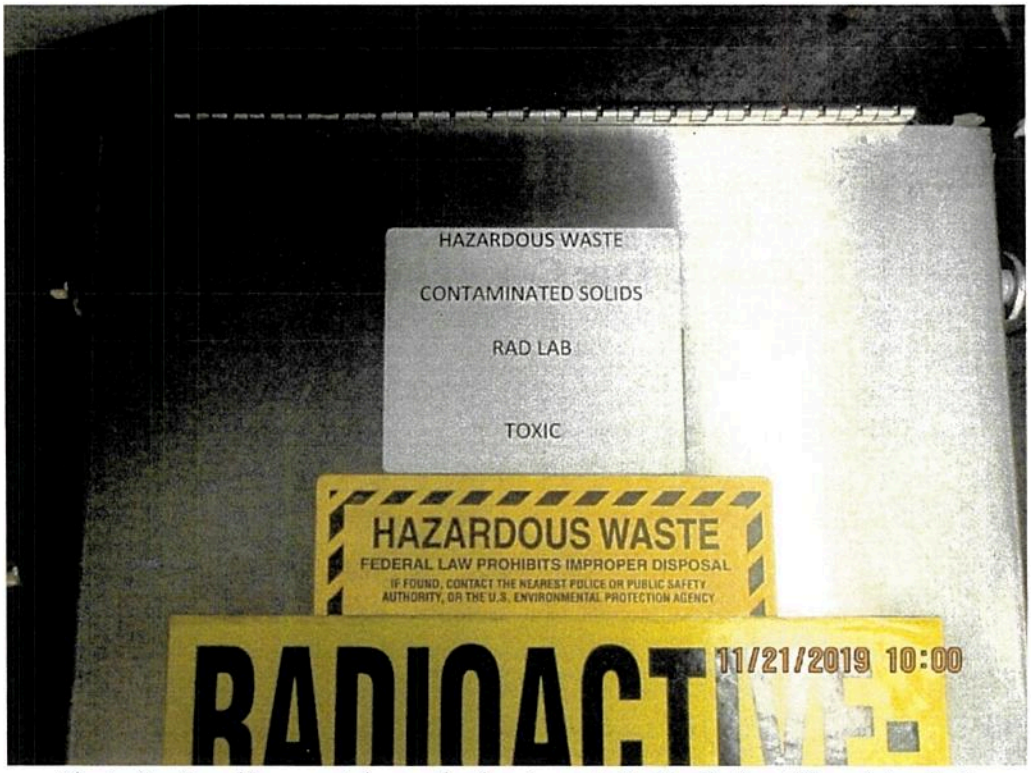

Photo 2 - 5-gallon container of mixed waste in Radiation Chemistry Lab

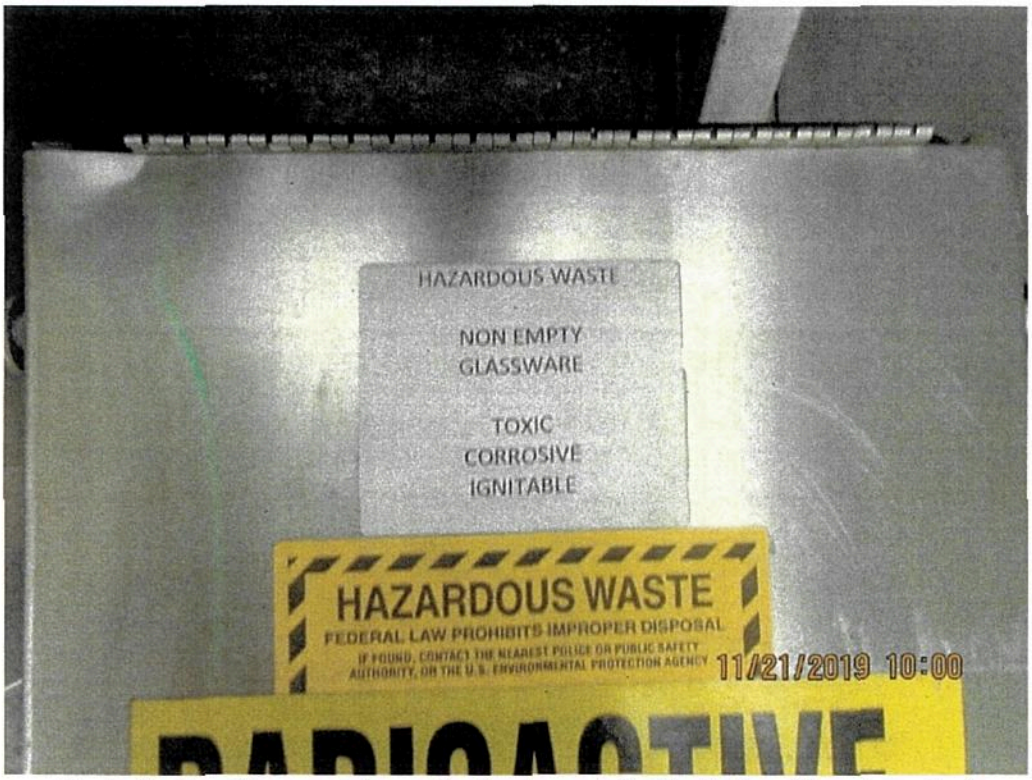

Photo 3 - 5-gallon container of mixed waste in Radiation Chemistry Lab

Photo 4 – Area Waste Storage Area

Photo 5 – Photo of site generated material in PSB area.

Photo 6 - Photo of site generated material in PSB area.

Photo 7 – Photo of label on stainless steel tote in PSB Consolidation area