



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

November 19, 2020

Ken Dean, EHS Compliance Specialist
US Ecology Tampa, Inc.
7202 East 8th Ave
Tampa, FL 33619
ken.dean@usecology.com

Re: US Ecology Tampa, Inc.
EPA ID No. FLD981932494
Hillsborough County

Dear Mr. Dean:

Department personnel conducted a routine hazardous waste compliance evaluation inspection of the above-referenced facility on October 28, 2020. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Abigail Bridges at (813) 470-5787, or via e-mail at: Abigail.Bridges@floridadep.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "M. Lynch".

Michael Lynch
Environmental Administrator
Southwest District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Don Locke, US Ecology Tampa, Inc., don.locke@usecology.com
Gerry Javier, EPCHC, javier@epchc.org
Leslie Pedigo, DEP, Leslie.Pedigo@FloridaDEP.gov
Abigail Bridges, DEP, Abigail.Bridges@FloridaDEP.gov
Michael Lynch, DEP, Michael.Lynch@FloridaDEP.gov
Amber Igoe, DEP, Amber.Igoe@FloridaDEP.gov



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

FACILITY INFORMATION:

Facility Name: US Ecology Tampa Inc
On-Site Inspection Start Date: 10/28/2020 **On-Site Inspection End Date:** 10/28/2020
ME ID#: 21659 **EPA ID#:** FLD981932494
Facility Street Address: 2002 N Orient Rd, Tampa, Florida 33619-3356
Contact Mailing Address: 7202 E 8th Ave, Tampa, Florida 33619-3380
County Name: Hillsborough **Contact Phone:** (813) 319-3423

NOTIFIED AS:

LQG (>1000 kg/month), Pharmaceuticals Reverse Distributor, TSD Facility, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Importer **Transporter:** Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** Oil Filters **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)
Hazardous Waste Pharmaceuticals:
Pharmaceutical Activities: Reverse Distributor

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Abigail B Bridges, Inspector
Leslie Pedigo, Environmental Consultant; Michael Lynch, Environmental Administrator;
Other Participants: Ken Dean, EHS Compliance Manager; Don Locke, General Manager

LATITUDE / LONGITUDE: Lat 27° 57' 44.8953" / Long 82° 22' 25.1455"

NAIC: 562219 - Other Nonhazardous Waste Treatment and Disposal

TYPE OF OWNERSHIP: Private

Introduction:

US Ecology Tampa, Inc. ("US Ecology"), was inspected by the Florida Department of Environmental Protection ("Department") on October 28, 2020, to determine the facility's compliance with state and federal hazardous waste rules. The facility initially notified as a Treatment, Storage and Disposal facility on September 11, 1997. The Department conducted a number of inspections at this facility, most recently on October 14, 2019. Mr. Don Locke, General Manager, and Mr. Ken Dean, EHS Compliance Manager, accompanied the Department inspectors throughout the facility.

The facility's hazardous waste operating permit, No. 34875-HO-013, was renewed effective August 7, 2019, to continue operations as a hazardous waste treatment, storage, and transfer facility; the current permit expires on April 1, 2024. A modification to the previous permit occurred during the 2019 permit renewal authorizing a maximum permitted storage capacity of 4,950 gallons of hazardous waste in the waste processing building for up to 365 days; this increased from the previous maximum allowable limit of 4,400 gallons, or 80 drums. The permit expires on April 1, 2024. The facility is in the process of obtaining another permit modification to allow for the larger popup containments in the 10-day storage area and for the universal waste lamp storage container to

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be moved to a new location on the Orient Road (North) Property.

In addition, US Ecology is a Universal Waste (UW) Lamp Transporter, UW Device Transporter, UW Lamp Transfer Facility, UW Device Transfer Facility, UW Lamp SQH, UW Device SQH (current registration expires on March 1, 2021); a Hazardous Waste (HW) Transporter and HW Transfer Facility (current registration expires on June 30, 2021); and a Used Oil (UO) Transporter, US Transfer Facility, UO Filter Transporter, and UO Filter Transfer Facility (current registration expires on June 30, 2021).

Process Description:

The facility is located on two parcels both of which are owned by EQ of Florida, Inc.; the north property is 1.44 acres while the South Property is 3.08 acres. The facility has been in operation at this location since 1991. The facility has 82 employees and in operation 24 hours per day, 7 days per week. The facility is connected to the City of Tampa water and sewer.

The facility operates a hazardous and solid waste treatment building on the south side of East 8th Avenue, along with offices and parking areas for trailers and roll-off containers (South Property). A section of pavement in this area is designated for less than 10-day transfer facility operations. The hazardous waste container storage facility and the Universal Waste Storage Area are located on the north side of East 8th Avenue (North Property).

Emergency equipment was located throughout the facility and appears to be in good condition, with the last first extinguisher inspection occurring in December of 2019. Uniforms are laundered by Cintas Uniform Services. A cardboard roll off and a scrap metal roll off are located near the main office building.

LABORATORY

The laboratory is located on the bottom floor of the Administrative Building. The laboratory is used for "truthing" waste samples from customers to ensure that they match the waste profile that the customers provides. However, US Ecology does not characterize waste for customers in their laboratory. The laboratory also conducts Inductively Coupled Plasma (ICP) Bench Testing for their treated hazardous waste. Hazardous waste is generated from old samples and the Inductively Coupled Plasma (ICP) machine. Several satellite waste containers were present in this area: a 5-gallon polypropylene container of ICP waste, one 5-gallon polypropylene container of TCLP waste, a 15-gallon flip top can for the collection of gloves and other solid waste, and a number of small containers of sample waste. All containers were closed and labeled with a hazardous waste label and an indication of the hazard. Waste in this area is lab-packed and re-manifested back to US Ecology for proper disposal.

INBOUND/OUTBOUND STAGING AREA & TEN-DAY TRANSFER AREA

Trailers (between 48-foot to 53-foot in size) parked in the Inbound/Outbound staging area/10-day transfer area were marked to show the date the trailer was received or loaded, and the date by which the trailer must either be unloaded or leave the facility. No transfer waste was on-site more than 10 days. At the time of the inspection, three inbound (dated October 26, 2020, October 26, 2020, and October 27, 2020, respectively) and three outbound trailers (dated October 22, 2020, October 26, 2020, and October 27, 2020, respectively) were present in this area. The outbound trailer dated October 27, 2020 was being hooked up to the truck cab in preparation to leave. All six trailer were properly placarded. and were located in pop-up containment that was at least 110% of the capacity of the contents contained within each trailer.

WASTE PROCESSING BUILDING

Waste treatment building houses separate mix tubs for solid and hazardous waste. As the facility uses dedicated equipment for mixing hazardous waste, and solid waste is handled separately, decontamination of equipment between batches of hazardous waste is not needed. The hazardous waste mix tub is certified as meeting 40 CFR 265 Subpart J requirements. Hazardous waste treated include D002, D004, D011, and K062. The facility is not authorized to treat hazardous waste with organic underlying hazardous constituents. Hazardous waste is treated with a ferric and sulfide reagent. Sawdust is also added for solidification. The treatment building is authorized to store a limited number of containers of hazardous waste (4,950 gallons) prior to treatment. At the time of the inspection, a batch was undergoing treatment and the building could not be entered without respiratory protection. A light system is used to indicate when treatment is ongoing.

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Treatment chemicals are stored in silos, two Conex boxes and a trailer located outside and adjacent to the treatment building. A backhoe is used to blend the treatment chemicals with the waste. Batches can include unloaded drums IBCs, and, occasionally, the contents of vacuum trucks. After stabilization is complete, the waste is tested for free liquids by the paint filter liquids test in the in-house lab. Samples are also screened for toxicity and the underlying hazardous constituent metals. Samples that fail the initial screening are re-treated. Samples that pass screening are then sent to a NELAP-accredited laboratory for confirmatory analysis. Wastes that meet treatment standards are shipped to a Subtitle D landfill. Wastes not meeting treatment standards are re-treated in the treatment tank. Per facility personnel, they have only had two batches not meet the treatment standards in the past year; these passed the treatment standards following retreatment. The facility uses bar codes on the containers that are received to track each waste movement from the incoming manifest to the treatment batch (if applicable), analytical results, and the outgoing shipping record. No issues were found with respect to the operating record.

LOW EXPLOSIVE MAGAZINE

A small, explosives magazine, measuring 392 cubic feet in volume, is used for storing storing 1.4 DOT Classified waste (flares, fireworks, small arms ammunition, and small explosives actuated devices) is located within the Treatment Building.

BULK CONTAINERS STORAGE AREA/SWMU 20 A, SWMU20 B, and SWMU20 C

Treated waste is loaded into roll-off trailers, which are then tarped and staged in three areas (A, B, and C) outside the treatment building. Each roll-off is labeled "Treated Hazardous Waste," marked with an accumulation start date, and marked with the batch and roll-off numbers. They are held in the designated bulk container storage area pending receipt of the confirmatory analytical results. After testing is complete, the boxes that meet treatment standards are re-labeled as "Treated Non-Hazardous Waste" and scheduled for transport to a landfill.

At the time of the inspection, the storage area was under the maximum capacity of 40 20-yard roll-offs (800 cubic yard). Area A contained 11 empty roll offs; 3 roll offs that were pending analysis and 5 roll offs that had passed confirmatory analysis and were awaiting transportation to the landfill. Area B was empty and Area C contained 1 roll off that had passed confirmatory analysis and were awaiting transportation to the landfill.

Solidified solid waste is managed in a separate area, and roll-offs of this material are both tarped and kept under cover.

HAZARDOUS WASTE CONTAINER STORAGE BUILDING

The hazardous waste container storage building was within its permitted storage capacity of 50,000 pounds of hazardous waste. The storage area is organized so that incompatible wastes are not stored together, and so that facility staff know which container have recently come in and which containers are going out. Bay 1 is used for the weighing and processing inbound waste; some consolidation of waste into new containers is done. Acid wastes are also stored in this bay. Bay 2 houses Flammable and Reactive Wastes. Bay 3 is used to store Caustic, Oxidizer and Toxic waste; most of the waste consolidation of waste into new containers is done in this bay. A walk-through of the building confirmed that all containers of hazardous waste were closed and properly labeled. None of the containers had been stored for longer than the allot one-year time limit; the oldest container observed was dated December 20, 2019. The facility uses a barcode and scanning system to keep track of hazardous waste containers.

Containers were staged on the pavement in front of the middle bay of the hazardous waste storage building. These containers included pallets of propane cylinders that were being managed as unused commercial fuel intended for recycling. Other containers included materials collected from household hazardous waste collections, such as latex paint containers awaiting crushing and consolidation of the contents. Containers of universal waste batteries were staged in front of Bay 3. The contains were closed and properly labeled.

UNIVERSAL WASTE STORAGE

Universal waste lamps are stored in a box truck located on the North Property. The contains were closed and properly labeled.

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USED OIL

Used oil is sniffed for halogens upon arrival. If the used oil fails for halogens, it is rejected and sent back to the generator. Used oil containers are staged in the hazardous waste container storage building. Following consolidation, the used oil is shipped off for treatment. Used oil containers are not stored for more than 35 days.

RECORDS

Facility records are maintained electronically, and records were provided via email on October 30, 2020. A waste inventory is conducted once per day, along with the facility's inspections. A sample of the facility's waste inventories and inspections was provided and reviewed. These records appear to be in compliance with state and federal regulations.

Containers labels could be tracked to the incoming manifest and waste profiles, treatment batch numbers, analytical records, and outbound shipping documents. A sample of the facility's records was provided and reviewed. These records appear to be in compliance with state and federal regulations, and no discrepancies were observed. Records did indicate that US Ecology had one treatment batch fail. This batch passed following re-treatment.

The facility's Contingency Plan and personnel training records were reviewed and appear to be current. Documentation was provided indicating that the Contingency Plan had been distributed to local emergency services. The last training occurred on September 11, 2020.

PHOTO ATTACHMENTS:

Properly Managed Laboratory ICP Waste



Waste Processing Building



Inbound/Outbound Trailers



Low Explosive Magazine



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Bulk Container Storage



Universal Waste Lamps



Inside Bay 1 of the Hazardous Waste Container Storage Building



Conclusion:

Based on the observations made at the time of the inspection, US Ecology Tampa, Inc., was operating in compliance with the state and federal hazardous waste rules applicable to treatment, storage, and disposal facilities.

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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

Abigail B Bridges**Principal Investigator Name**Environmental Specialist II**Principal Investigator Title****Principal Investigator Signature**FDEP-SWD**Organization**11/18/2020**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**FDEP_SWD**Organization**Michael Lynch**Inspector Name**Environmental Administrator**Inspector Title**FDEP-SWD**Organization**Ken Dean**Representative Name**EHS Compliance Manager**Representative Title**US Ecology**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.

Don Locke**Representative Name**General Manager**Representative Title**US Ecology**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:** Michael C Lynch**Inspection Approval Date:**11/18/2020