



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

March 8, 2021

Wayne Ellis, President
Electrical Engineering Enterprises, Inc.
5316 E. Henry Ave,
Tampa, FL 33610
Ellis@electeng.com

Compliance Assistance Offer Letter
Electrical Engineering Enterprises, Inc.
Facility EPA ID: FLR000215376
Hillsborough County

Dear Mr. Ellis:

An inspection was conducted at your facility on February 21, 2021. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Specifically, potential non-compliance with the requirements of chapter 403, Florida Statutes, chapters 62-710 and 62-730, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the items of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed, or
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid.

It is the Department's desire that you are able adequately address the aforementioned issues within 15 days so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Abigail Bridges of the Southwest District Office at 813-470-5787 or via e-mail at Abigail.Bridges@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Lynch', with a long horizontal stroke extending to the right.

Michael Lynch
Environmental Administrator
Southwest District
Florida Department of Environmental Protection

Attachment: Inspection Report

cc: Michael Lynch, DEP; Michael.Lynch@floridadep.gov
Abigail Bridges, DEP; Abigail.Bridges@floridadep.gov
Nicole Wilson, Electrical Engineering; wilson@electeng.com



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

FACILITY INFORMATION:

Facility Name: Electrical Engineering Enterprises Inc
On-Site Inspection Start Date: 02/12/2021 **On-Site Inspection End Date:** 02/12/2021
ME ID#: 116885 **EPA ID#:** FLR000215376
Facility Street Address: 5316 E Henry Ave, Tampa, Florida 33610-4843
Contact Mailing Address: 5316 E Henry Ave, Tampa, Florida 33610
County Name: Hillsborough **Contact Phone:** (813) 740-9601

NOTIFIED AS:

Non-Handler, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Non-Handler Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Abigail B Bridges, Inspector
Other Participants: Wayne Ellis, President

LATITUDE / LONGITUDE: Lat 28° 0' 0.4819" / Long 82° 23' 46.8424"

NAIC: 238210 - Electrical Contractors

TYPE OF OWNERSHIP: Private

Introduction:

Electrical Engineering Enterprises, Inc. (EEE) was inspected on February 12, 2021 to evaluate its compliance with state and federal hazardous waste and used oil regulations. As of October 2019, this facility is a used oil transporter, and is currently notified as a non-handler of hazardous waste. The inspector 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 40 employees, and the facility is on Tampa water and sewer systems. The facility has been operating at this location since approximately 2012. The facility process has not changed; see the December 2015 and March 2016 inspection reports for additional information.

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. Sometime the used transformer oil is brought back to the facility and stored temporarily in containers in the loading dock bay. Other times it is brought brought back by facility personnel and transferred to to 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

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

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 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). At the time of the inspection, the totes were closed, but not all were labeled with the words "used oil." Photographic documentation was received via email on February 22, 2021 that the totes had been properly labeled. The loading dock floor slopes to the rear, and there is a sealed berm across the front which provides adequate secondary containment for the used oil containers.

An asphalt lot, located on the southwest corner of the property, was previously used to stage and disassemble retired light fixtures, which are acquired through off-site renovation projects being performed by EEE, as referenced in the 2018 report, an asphalt lot, located on the southwest corner of the property had previously been used to stage and disassemble retired light fixtures. At the time of the inspection, this area was free of the disassembled light fixtures and other hazardous material, and it is currently used for yard storage.

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. Samples are collected by and sent for analyses by Weidmann Electric or T & R Electric. EEE subcontracts TCI to handle any transformer oil that contains PCBs above the regulatory limit. EEE only transports used transformer oil from the job site to either their own facility or the 6,000-gallon double-walled tanker trailer located at Stepp's Towing.

The facility was able to provide current used oil transporter training records, and the training curriculum appeared to be in compliance with applicable state and federal regulations. Additionally, the facility maintained records of used oil transporter training for a minimum of three years and these records were made available for review.

The facility failed to provide the requested Used Oil Acceptance Records in a timely manner for the Department to review. Used oil transporters are required to maintain records of used oil deliveries following transport. As previously requested, the facility must submit Used Oil Acceptance Records for the months of February 2018, November 2018, March 2019, October 2019, June 2020, and January 2021, for the Department to review. These documents must be submitted within 15 days of receiving the inspection report.

Delivery records were received for the months of January 2021, December 2020, and two from February 2020, however additional delivery records were requested and have yet to be provided. The facility must submit Used Oil Delivery Records for the months of February 2018, November 2018, March 2019, October 2019, and June 2020, for the Department to review. These documents must be submitted within 15 days of receiving the inspection report.

The facility presented the Department with with completed 8700-12FL Form, date 5/8/2020, and documentation of current and adequate liability insurance. However, the facility was not able to prove that the documentation had been previously submitted to the Department's Hazardous Waste Regulation Office in Tallahassee. The facility continued to operate when their last Used Oil Transporter Registration expired on June 30, 2020. The facility must immediately obtain a renewed used oil transporter registration for the July 1, 2020 to June 30, 2021 registration year or, or cease operations. The renewed documents must be provided to the Department for review. In addition, renewal documents for the July 1, 2021 to June 30, 2022, were supposed to have been submitted to the Department's Tallahassee office by March 1, 2021; if the facility intends to continue to operate, these documents must be immediately provided.

At the time of the inspection, the identification number was displayed, however, the Used Oil Registration was not displayed in a prominent area. Upon receiving the renewed Used Oil Registration, the registration shall be displayed in a prominent place within the facility. A photo of the Used Oil Registration must be submitted to the Department for review within 15 days of receipt.

The facility must maintain used oil records on DEP Form 62-701.900(13) or an equivalent. Despite being requested on February 12, 2021, the facility failed to provide these records in a timely manner for the Department to review. Within 15 days, the facility must submit used oil records on DEP Form 62-701.900(13) or an equivalent for Department review.

By March 1st, Used Oil Transporters must submit an annual report on DEP Form 62-701.900(14) summarizing

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

the on site records for the previous calendar year. The facility failed to provide the annual report for the preceding year in a timely manner for the Department to review. Within 15 days, the facility must submit their annual report for the 2020 calendar year on DEP Form 62-701.900(14) summarizing the on site records from the previous calendar year for the Department to review.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Question Number:	5.4
Question:	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"?
Explanation:	279.22(c)(1) 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, seven of the ten totes containing used oil were not properly labeled with the words "used oil."
Corrective Action:	Facility must ensure that all totes containing used oil are properly labeled with the words "used oil."

CORRECTED: On February 22, 2021, photo documentation of the corrective action was received via email.

Photo Attachments:

Unlabeled totes



Properly labeled Used Oil Totes



Properly labeled Used Oil Totes



Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

Type:	Violation
Rule:	279.46(a) , 279.46(b)
Explanation:	279.46(a): Used oil transporters must maintain records of used oil accepted for transport. The facility failed to provide the requested Used Oil Acceptance Records in a timely manner for the Department to review.
Corrective Action:	<p>279.46(b): Used oil transporters must maintain records of used oil deliveries following transport. Delivery records were received for the months of January 2021, December 2020, and two from February 2020, however additional records were requested and have yet to be provided.</p> <p>279.46(a): The facility must submit Used Oil Acceptance Records for the months of February 2018, November 2018, March 2019, October 2019, June 2020, and January 2021, for the Department to review. These documents must be submitted within 15 days of receiving the inspection report.</p> <p>279.46(b): The facility must submit Used Oil Delivery Records for the months of February 2018, November 2018, March 2019, October 2019, and June 2020, for the Department to review. These documents must be submitted within 15 days of receiving the inspection report.</p>
Type:	Violation
Rule:	62-710.500(3) , 62-710.500(4)
Explanation:	<p>62-710.500(3): If the registration is not renewed by June 30 of the following year because the Department has not received complete and accurate registration renewal documents and the registration fee, the facility will no longer be authorized to transport used oil. The facility presented the Department with with completed 8700-12FL Form, date 5/8/2020, and documentation of current and adequate liability insurance. However, the facility was not able to prove that the documentation had been previously submitted to the Department's Hazardous Waste Regulation Office in Tallahassee. The facility continued to operate when their last Used Oil Transporter Registration expired on June 30, 2020.</p> <p>62-710.500(4): Used Oil Registration shall displayed, along with the identification number in a prominent place at each facility location. At the time of the inspection, the identification number was displayed, however, the Used Oil Registration was not displayed in a prominent area.</p>
Corrective Action:	<p>62-710.500(3): The facility must immediately obtain a renewed used oil transporter registration, or cease operations. The renewed registration must be provided to the Department for review. In addition, renewal documents for the July 1, 2021 to June 30, 2022, were supposed to have been submitted to the Department's Tallahassee office by March 1, 2021; if the facility intends to continue to operate, these documents must be immediately provided.</p> <p>62-710.500(4): Upon receiving the renewed Used Oil Registration, the registration shall be displayed in a prominent place within the facility. A photo of the Used Oil Registration must be submitted to the Department for review within 15 days of receipt.</p>
Type:	Violation
Rule:	62-710.510(1) , 62-710.510(5)
Explanation:	<p>62-710.510(1): The facility must maintain used oil and used oil filter records on DEP Form 62-701.900(13) or an equivalent. The facility failed to provide these records in a timely manner for the Department to review.</p> <p>62-710.510(5): By March 1st, Used Oil Transporters must submit an annual report on DEP Form 62-701.900(14) summarizing the on site records for the previous calendar year [62-710.510(5)]. The facility failed to provide the annual report for the preceding year</p>

Inspection Date: 02/12/2021

Corrective Action: in a timely manner for the Department to review.
62-710.510(1): Within 15 days, the facility must submit used oil and used oil filter records on DEP Form 62-701.900(13) or an equivalent for Department review.
62-710.510(5): Within 15 days, the facility must submit their annual report on DEP Form 62-701.900(14) summarizing the on site records from the previous calendar year for the Department to review.

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.

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

Inspection Date: 02/12/2021

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	✓		

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)		✓	
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			✓
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			✓
Item No.	Used Oil Filter Container Management	Yes	No	N/A

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)			✓
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)			✓
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)			✓
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)			✓
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)			✓
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)			✓
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oil? 62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
	<input type="checkbox"/> Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	<input type="checkbox"/> Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	<input type="checkbox"/> Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			✓

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A
	<input type="checkbox"/> Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40			

Inspection Date: 02/12/2021

	CFR 279 Subpart H.]			
	<input type="checkbox"/> Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

Inspection Date: 02/12/2021

6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading			✓
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)			✓
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)			✓
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)			✓
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)			✓
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)			✓
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)			✓
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)			✓
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

Electrical Engineering Enterprises Inc Inspection Report

Inspection Date: 02/12/2021

6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

Inspection Date: 02/12/2021

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**03/04/2021**Date**Wayne Ellis**Representative Name**President**Representative Title**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:**Michael C Lynch**Inspection Approval Date:**03/08/2021