Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: US Ecology Tampa Inc

On-Site Inspection Start Date: 12/22/2022 **On-Site Inspection End Date:** 12/22/2022

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) 319-3433

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 **Other:** Recognized Trader Importer **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, 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:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

Hazardous Waste Pharmaceuticals:

Pharmaceutical Activities: Reverse Distributor

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Warren McNelley, Inspector

Other Participants: Robert Denoux, Environmental Specialist II; Don Locke, General Manager; Ken Dean, EHS Compliance Manager

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

NAIC: 562211 - Hazardous 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 December 22, 2022, to determine the facility's compliance with state and federal hazardous waste regulations. The facility initially notified as a Treatment, Storage and Disposal facility on November 12, 1987 under the name Universal Waste Transit, Inc. Since that time, the facility has had numerous name and ownership changes. The Department has conducted a number of inspections at this facility, most recently on October 28, 2020. Don Locke, General Manager, accompanied Department inspectors throughout the inspection.

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 facility is in the process of obtaining another permit modification to allow for an increase in the allowable volume

of hazardous waste that can be under treatment in the Waste Treatment Building. The current maximum volume of waste allowed to be treated at one time is 4,950 gallons, per the existing permit. The facility has proposed a modification to allow for a new maximum of 10,000 gallons of hazardous waste to be under treatment at one time.

The additional active registrations for US Ecology are as follows:

• 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, 2023).

• Hazardous Waste (HW) Transporter and HW Transfer Facility (current registration expires on June 30, 2023).

• Used Oil (UO) Transporter, UO Transfer Facility, UO Filter Transporter, and UO Filter Transfer Facility (current registration expires on July 1, 2023).

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 1987. The facility has approximately 77 employees and is 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 Building 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 appeared to be in operational and in good condition at the time of the inspection. Uniforms are laundered by Cintas Uniform Services.

LABORATORY
The laboratory is located on the bottom floor of the Administrative Building. While US Ecology does not characterize waste for customers in their laboratory, the laboratory is used for “truthing” waste samples from customers to ensure that they match the waste profile that the customer provides. In addition, the laboratory conducts Inductively Coupled Plasma (ICP) Bench Testing for their treated hazardous waste. Hazardous waste in this area is generated from old samples and the 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 contaminated PPE 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
At the time of the inspection, six trailers were parked in the Inbound/Outbound staging area/10-day transfer area and 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. At the time of the inspection, no transfer waste was on-site more than 10 days. The six trailers present 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
The waste treatment building houses separate mix tubs for solid and hazardous waste. The facility uses two excavators for mixing waste. Each excavator is dedicated to either hazardous or solid waste mixing, therefore 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 codes associated with the hazardous wastes treated in this building 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. Ash kept in a silo behind the building is added to the hazardous waste mix tub for solidification during processing. Sawdust is added to the solid waste mix tub during processing 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, the treatment building was not actively treating batches of hazardous waste and the volume of hazardous waste stored in the building was under under the 4,950 gallons

permit limit gallons. At the time of the inspection, hazardous waste containers were not present in the building. The waste mixing tubs appeared to be in good condition and are situated over impermeable surfaces inside the Waste Processing Building. A light system is used to indicate when treatment is ongoing.

Treatment chemicals are stored in silos, Conex boxes, and a trailer located outside of the building. Batches of hazardous waste can come from unloaded drums, intermediate bulk containers, and, occasionally, the contents of vacuum trucks. After stabilization is complete, the waste is tested for free liquids using 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 from batches that pass on-site screening are then sent to a NELAP-accredited laboratory for confirmatory analysis. Treated wastes that are confirmed as meeting the treatment standards are shipped to a Subtitle D landfill. Wastes not meeting treatment standards are re-treated in the treatment building. The facility places barcodes on the containers. The barcodes track each waste movement from the incoming manifest to the treatment batch (if applicable), analytical results, and to the outgoing shipping 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. The container was properly labeled at the time of inspection, and appeared to be in good condition.

BULK CONTINERS 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. Following treatment, roll-offs are 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 are scheduled for transport to a landfill.

The storage area has a permitted maximum capacity of 40 20-yard roll-offs (800 cubic yards). At the time of the inspection, 13 treated hazardous waste 20-yard roll-off containers were observed in the storage area. All of the roll-off containers were in good condition; the accumulation start date labels and container identification numbers were easily observable. The oldest container observed was dated December 12, 2022 and contained 16.22 tons of treated hazardous waste.

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
At the time of the inspection, based on facility records and observation, the hazardous waste container storage building appeared to be under the permitted storage capacity of 50,000 pounds of hazardous waste. The storage building is organized so that incompatible wastes are not stored together, and so that facility staff know which containers have recently arrived and which containers have been in storage the longest.

Bay 1 is used for the weighing and processing of inbound waste; some consolidation of waste into new containers is performed. Acidic hazardous wastes are also stored in this bay. Bay 2 houses Flammable and Reactive hazardous wastes. Bay 3 is used to store Caustic, Oxidizer and Toxic hazardous wastes; most of the 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 labeled with the words "hazardous waste", an indication of the hazards of the contents, an accumulation start date, and were closed. None of the containers had been stored for longer than the permitted one-year time limit; the oldest container observed was dated February 3, 2022. The facility uses a barcode and scanning system to keep track of hazardous waste containers. Sufficient aisle space was maintained to allow for the inspection of all containers in the building.

At the time of the inspection, there were renovations taking place in front of the hazardous waste container storage building. The associated construction permit can be observed in the inspection photos.

UNIVERSAL WASTE STORAGE
Universal waste lamps are stored in a box truck located on the North Property. The containers were closed and properly labeled. Containers of universal waste batteries were staged in front of Bay 3. The containers were

covered and properly labeled.

USED OIL
Used oil is evaluated 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 based on observed accumulation start dates.

RECORDS
Facility records are maintained electronically. Container labels can be tracked through the incoming manifest and waste profiles, treatment batch numbers, analytical records, and outbound shipping documents. A sample of the facility's records were provided and reviewed. These records appeared to be in compliance with state and federal regulations, and no discrepancies were observed.

• Facility generated hazardous waste manifests from the last three years were provided via email on January 3, 2023. Upon review, these records appeared to be in compliance with state and federal regulations, and no discrepancies were observed.

• The facility's Contingency Plan and Quick Reference Guide appeared complete upon review. Documentation was provided indicating that the Contingency Plan had been distributed to local emergency personnel.

• Annual personnel training records were reviewed and appeared to be complete. The last training occurred on October 17, 2022.

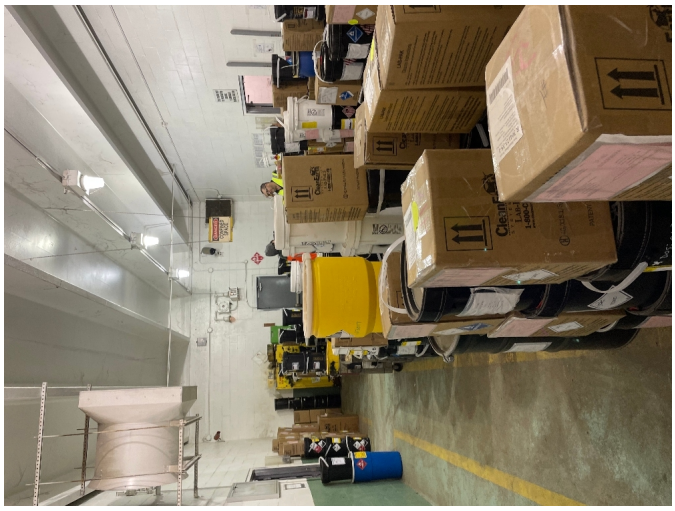
• A waste inventory is conducted once per day, along with the facility's inspections. A sample of the facility's waste inventories and inspections was provided and reviewed. These records appeared to be in compliance with state and federal regulations. The highest observed volume of waste stored in the Hazardous Waste Containers Storage Building during records review was 44,867 gallons, and this is below the permitted 50,000 gallon volume.

• The 2021 biennial report was received electronically by the Department on March 2, 2022.

PHOTO ATTACHMENTS:

Inductively Coupled Plasma satellite accumulation jug

Bay #2, Hazardous Waste Container Storage Building

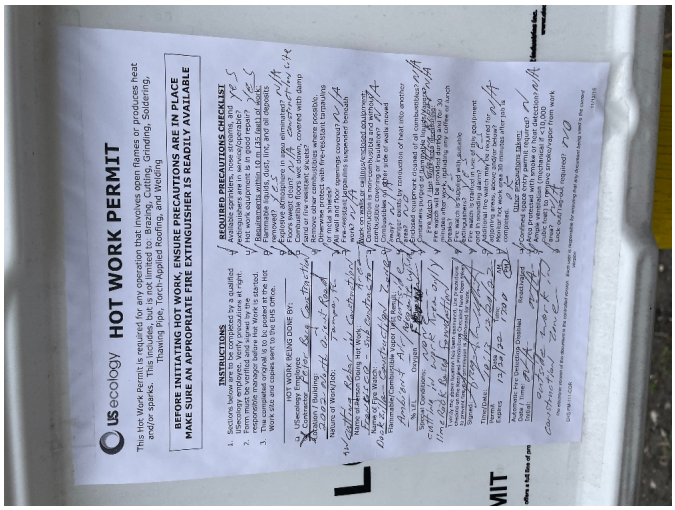


US Ecology Tampa Inc Inspection Report

Inspection Date: 12/22/2022

Excavator in the Hazardous Waste Treatment Building

Hot Work Permit



Treated hazardous waste roll-off container

Universal waste storage box truck

Conclusion:

At the time of the inspection, US Ecology Tampa, Inc., was operating in compliance with state and federal hazardous waste regulations applicable to treatment, storage, and disposal facilities.

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	✓		

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

Warren McNelley	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	01/20/2023
Principal Investigator Signature	**Organization**	**Date**

Robert Denoux	Environmental Specialist II
Representative Name	**Representative Title**
	DEP
	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	General Manager
Representative Name	**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.

Ken Dean	EHS Compliance Manager
Representative Name	**Representative Title**
	US Ecology
	Organization

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Report Approvers:

Approver:	Michael Miller	**Inspection Approval Date:**	01/23/2023