



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: EQ Florida Inc

On-Site Inspection Start Date: 07/22/2009 **On-Site Inspection End Date:** 07/22/2009

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)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D Camp, Inspector

Other Participants: Tara Swanson, ES II; Stuart Stapleton, Regulatory Specialist; Kelly Honey, ES III

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

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

EQ Florida was inspected on July 22, 2009 to determine the facility's compliance with state and federal hazardous waste regulations. A follow-up visit was conducted on July 30, 2009 to finish a review of the facility's paperwork and manifests. Mr. Stuart Stapleton assisted the inspectors throughout both inspections. EQ Florida is a permitted hazardous waste treatment and storage facility and a large quantity generator of hazardous waste. EQ was last inspected in March 2008.

Process Description:

Operation at EQ Florida have not changed significantly since the last inspection. EQ was not exceeding their permitted waste capacity at the time of the inspection. All five of the sumps in the storage building were dry. No evidence of discharges were observed. The facility's emergency equipment appeared well maintained. The daily inspection logs for the storage bays, sumps and volume checks were reviewed. At least three of the daily logs did not have the supervisor's approval signature. Please note that failing to have the supervisor review the daily logs is a violation of the permit conditions. The inspectors also reviewed the training records and financial assurance documents; no deficiencies were noted. The facility had copies of its operating permit (and all associated documents), a current contingency plan and closure plan. Incoming and outgoing manifests were also reviewed.

The only change since the Department's last inspection is that the facility will have a new vehicle maintenance area located within the main building. This area has an approximately 30 gallon Heritage Crystal Clean parts washer. The facility was instructed to conduct a proper waste determination on any wastes from the parts washer prior to managing them as non-hazardous.

Inspection Date: 07/22/2009

New Potential Violations and Areas of Concern:**Checklist Independent Potential Violations and Areas of Concern**

Type: Area Of Concern

Rule: 263.20(a)

Explanation: During the inspection, a manifest was observed in which EQ had transported hazardous waste on an improperly filled out manifest. EQ had transported over 2700 pounds of hazardous waste from a non-notifying SQG that was identified as "CESQG" on the manifest. In addition, EQ had transported hazardous waste from this facility multiple times over the past two years in which it was evident that the facility was generating over 220 pounds montly.

Corrective Action: Please ensure that when transporting hazardous wastes in excess of 2200 pounds, that the generator has either an EPA Identification number or a Temporary ID number.

Type: Area Of Concern

Rule: 273.13(a), 273.14(a)

Explanation: During the inspection, a box containing universal waste batteries was observed without a label and in very poor condition.

Corrective Action: Please ensure that universal waste batteries are stored in closed, structurally sound containers that are labeled with the words "Universal Waste Batteries", "Waste Batteries" or "Used Batteries."

Type: Violation

Rule: 273.13(d)

Explanation: During the inspection, one box storing universal waste lamps was observed in the box truck that was not properly closed. (corrected immediately after inspection)

Corrective Action: Please ensure that all universal waste lamps are stored in structurally sound containers that are closed and properly labeled.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 273.13(d)		07/22/2009	During the inspection, one box storing universal waste lamps was observed in the box truck that was not properly closed. (corrected immediately after inspection)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			

Inspection Date: 07/22/2009

Rule Number	Area	Date Cited	Explanation
263.20(a)		07/22/2009	During the inspection, a manifest was observed in which EQ had transported hazardous waste on an improperly filled out manifest. EQ had transported over 2700 pounds of hazardous waste from a non-notifying SQG that was identified as "CESQG" on the manifest. In addition, EQ had transported hazardous waste from this facility multiple times over the past two years in which it was evident that the facility was generating over 220 pounds montly.
273.13(a), 273.14(a)		07/22/2009	During the inspection, a box containing universal waste batteries was observed without a label and in very poor condition.

Conclusion:

At the time of the inspection, EQ Florida was not operating in compliance with state and federal hazardous waste regulation. Subsequent to the inspection the facility returned to compliance.

Inspection Date: 07/22/2009

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Shannon D Camp

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

8/7/2009

DATE

Tara Swanson

INSPECTOR NAME

ES II

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

Kelly Honey

INSPECTOR NAME

ES III

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

Stuart Stapleton

REPRESENTATIVE NAME

Regulatory Specialist

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

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.