



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: EQ Florida Inc

On-Site Inspection Start Date: 09/19/2012 **On-Site Inspection End Date:** 09/21/2012

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: Elizabeth Knauss, Environmental Manager

Other Participants: Ken Burns, Plant Manager; Stuart Stapleton, EHS Manager; Macho Cruz

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 Inc.'s hazardous waste storage facility was inspected for compliance with the facility permit, renewed effective July 22, 2011. Facility operations have not changed significantly since the previous inspection on April 19, 2011. The renewed permit clarified and updated descriptions of EQ's methods for receiving, staging and loading waste. The facility appeared to be in compliance with the permit with respect to these practices. A number of facility staff, including Macho Cruz, Ken Burns and Stuart Stapleton, provided assistance during the inspection.

Process Description:

EQ Florida's hazardous waste storage facility consists of a three bay building with a covered loading dock with secondary containment where additional staging, can crushing and repackaging occurs. The revised facility permit specifies where and how incoming wastes are staged for inspection and sampling, before they are moved to appropriate storage bays. Incoming materials are checked in and counted against the manifest(s), entered into the facility's computerized tracking system and staged for QA/QC inspection under the facility's waste analysis plan. Once the identity of the material has been confirmed, wastes are moved to appropriate storage bays.

Outgoing materials that have been prepared for shipment off site are also staged for transport and then loaded into trailers as the shipping papers are being prepared. After loading, trailers may be moved to a parking area on contiguous property south of 9th Avenue and held for several days prior to pickup by the transporter. Any trailer holding hazardous waste is either parked within containment in the loading bays or provided with a pop up containment berm.

Offices are located in a separate metal building on the property. A box trailer parked near the metal

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building is used to store universal waste lamps after receipt. On the first day of this inspection, two boxes of lamps in the trailer were not properly closed or labeled. This was corrected immediately. Facility staff checking in waste were reminded to ensure that lamp containers were in compliance upon receipt or repackaged prior to placement in the trailer. A roll off is used to store non hazardous solid waste such as empty containers and uncontaminated packaging and PPE after received materials have been consolidated for shipment off site. Another trailer was being used to hold drums of non hazardous waste, including drums of DOT corrosive solids.

The facility was in compliance with its permitted storage capacity and the containment sumps were clean and dry. All containers were closed, labeled and dated, and only one container was noted with a small amount of residue on top. This had been partially cleaned up, and this was completed during the inspection. Emergency equipment was in place and in good condition.

The facility is no longer emptying and crushing aerosol cans. These are packaged for shipment off site. A pail crusher is used to crush containers of non-aerosol paints to consolidate the contents. Aisle space was tight in this area on the first day of the inspection due to a back log of material, however all containers were under the roof and within containment. Plastic sheeting was placed beneath the crusher to catch incidental drips.

The portion of the facility south of 9th Avenue includes paved parking, an office building with a small laboratory, a truck maintenance bay with a parts washer, and the solid waste processing area. The solid waste processing area was not inspected for compliance with it's solid waste permit. This contained area is also a used oil transfer facility. Used oil, oil filters and antifreeze are stored in this area in labeled containers for less than 35 days before being picked up for recycling by Raider Environmental Services. EQ does not market used oil fuel directly to burners. A drum labeled non hazardous waste and identified as waste non-controlled medicines dissolved in a mild acid solution was also in this area. Through the bar code on the drum, it was determined that the material was intended for incineration because it contained prescription drugs collected at a household waste drug collection event. As a result of the inspection, the drum was moved back to the TSD side of operations.

The QA laboratory conducts a limited number of analyses, including rapid test flash point analysis, pH, water reactivity, oxidizing potential and halogen content. The analyst does not typically check samples to determine if the flash point is between 140 and 200 degrees Fahrenheit. This could be a potential USDOT compliance issue when wastes from different containers are consolidated, and it was recommended that the facility consider expanding the testing temperature range for bulked liquids. The satellite accumulation containers in this area were in compliance, as was the lab's sample retention policy.

Training records, inspection records, the facility permit and the contingency plan were reviewed the first day of the inspection, and were in compliance. The contingency plan's list of emergency coordinators had been updated the month prior to the inspection. The second day of the inspection began with a re inspection of the storage facility to confirm that the aisle space near the can crusher was adequate. The back log of unprocessed paint had been addressed, reducing the amount of waste in this area. At that time, EQ staff reported an incident with seven drums of waste received the previous evening. The material was a corrosive oxidizer, a cold sterilant solution in plastic jugs overpacked in steel drums. The manifest indicated the shipment exceeded 2,200 lb. and had originated from a non-notifier. The container contents sheets indicated that the material had been packaged by the transporter seven days before receipt at EQ. When the containers were unloaded, it was apparent that the material was reacting with the packaging, and would be unsafe to reject or accept. At the time of the inspection, EQ had staged the material in the south side of the loading bay in order to continue to open and repack the container contents at an adequate distance from other waste at the facility.

Facility staff were proceeding with this during the record review. When one of the containers was opened, and the contents began to react and emit smoke, EQ implemented the facility contingency plan. Staff were evacuated to their assembly point and provided with instructions appropriate to their responsibilities. EQ staff and management addressed the situation appropriately. It was not necessary to request assistance from emergency authorities. A report on the incident was

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submitted in a timely manner, and the incident report has been forwarded to the Southeast District, where both the generator and transporter are located.

The record review, completed after this incident, found no violations. The facility's computer tracking system is able to track repackaged waste from incoming to outgoing manifests, waste profiles and land disposal restriction notices.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 273.13(d)(1), 273.14(e)

Explanation: Two boxes of universal waste lamps were open, and not labeled. (Corrected)

Corrective Action: Universal waste lamps should be checked when received, and should be labeled and repackaged if needed before placement into the storage trailer.

Conclusion:

EQ Florida was not in compliance with universal waste lamp management regulations at the time of the inspection. The violations noted, and the minor issues noted above were corrected during the inspection.

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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. 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.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

10/11/2012

DATE**Supervisor:** James Dregne

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.