



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Pensacola Recycling Inc

On-Site Inspection Start Date: 09/08/2014

On-Site Inspection End Date: 09/08/2014

ME ID#: 78235

EPA ID#: FLR000136861

Facility Street Address: 195 E Fairfield Dr, Pensacola, Florida 32503-2956

Contact Mailing Address: 3185 Newton Dr, Pensacola, Florida 32503-5106

County Name: Escambia

Contact Phone: (850) 777-6029

NOTIFIED AS:

Non-Handler

INSPECTION TYPE:

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Aaron Mitchell, Inspector

Other Participants: Jennifer Watson-Zam, President; Sonny Watson, Vice-President

LATITUDE / LONGITUDE: Lat 30° 26' 59.5106" / Long 87° 13' 24.1434"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Pensacola Recycling, Inc.(PRI) is a universal waste facility that temporarily transports and handles used fluorescent bulbs, waste batteries, and waste mercury-containing devices. The facility has been in business for 17 years and is owned and operated by Sonny Watson (Vice-President) and Jennifer Watson-Zam (President). The original storage facility was located on 9th Avenue, Pensacola but has since been relocated to its present address of 195 E. Fairfield Drive, Pensacola, Florida. PRI accumulates its universal wastes in a multi-unit storage unit within the Uncle Bob's Storage facility. The inspection was facilitated by Mr. Watson and Mrs. Zam.

Process Description:

Universal wastes are stored in two 25-foot long by 20-foot wide storage units. The facility expanded its storage capacity due to an increase in business and to stay in compliance with universal waste regulations. The wastes are accumulated in specific areas of the storage unit by similar wastes. PRI continues to use a "four count" system when accumulating their wastes after a pickup from a customer's facility. Most containers are stacked on pallets in rows of four and are approximately four-foot high. The containers that cannot be put in this 4 X 4 configuration are stacked in a way that ensures stability during transport. PRI uses an enclosed 6-foot wide by 8-foot long trailer to make universal waste pickups at all of its customer waste generating facilities. PCB ballasts and non-PCB ballasts are stored in 55-gallon drums near the front of the storage area. Universal waste batteries are temporarily stored in crates, with their terminals taped before being sorted into proper containers for shipment. Universal waste bulbs are stored in various cardboard containers, that were all properly labeled, dated, and in good condition. Four-foot bulbs were being accumulated on a wooden pallet in appropriate cardboard containers.

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PRI uses a spreadsheet to track the origins, date, and amount of universal wastes that are collected from its many customer facilities. A review of its waste pickup invoices and universal waste manifests showed no discrepancies. Every 4-5 weeks, a pickup of accumulated universal waste in the storage unit is performed by Lighting Resources (FLR000070565) out of Ocala, Florida. E-waste is taken to Wise Recycling for proper management and lead-acid batteries are taken to Interstate for proper recycling. Training, and spill response procedures were reviewed with no discrepancies observed. PRI uses a fully enclosed trailer to transport all collected universal wastes.

PHOTO ATTACHMENTS:

Universal Waste Lamps



E-Waste



Conclusion:

The facility appeared to be in compliance at the conclusion of 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.

Aaron Mitchell _____

PRINCIPAL INSPECTOR NAME

Inspector _____

PRINCIPAL INSPECTOR TITLE

Aaron Mitchell

PRINCIPAL INSPECTOR SIGNATURE

FDEP _____

ORGANIZATION

10/17/2014

DATE

Supervisor: James Byer

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.

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Universal Waste Transporter

Universal Waste Transporters - Standards for Handlers - 40 CFR 273 Subpart C & Subpart D	Potential Violation or AOC cited
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Standards for Universal Waste Transporters - 40 CFR 273 Subpart D		Potential Violation or AOC cited
35.10	Has the universal waste transporter notified the Department?	
35.20	Has the universal waste transporter certified that it has employee training procedures in place for the proper handling, emergency response, and containment and cleanup of its spent universal waste lamps or devices?	
35.30	Does the Universal Waste Transporter store waste for longer than 10 days? Note: If yes, the transporter is subject to the small or large handler requirements, as applicable.	
35.40	If yes, does the universal waste transfer facility store 2,000 kg. or greater of universal waste lamps or 100 kg or more of devices in areas other than on the transport vehicle and has the Transfer Facility submitted a one time registration fee of \$1,000?	✓
35.50	Did the universal waste transfer facility develop and submit to the Department, along with its registration, an operational plan including a description of its general housekeeping measures, employee training program, methods to prevent breakage or releases, and its methods for responding to releases of universal waste lamps or devices or their components?	
35.60	Did the transporter dispose of universal waste?	
35.70	Does the transporter dilute or treat universal waste?	
35.80	Has the transporter responded immediately to contain all releases?	
35.90	Has the transporter sent universal waste only to another universal waste handler, a destination facility, or a foreign destination?	
35.100	If the universal waste transporter transported, at any one time, more than 5000 kilograms of universal pharmaceutical waste or more than one kilogram of p-listed universal pharmaceutical waste, did the transporter comply with the financial responsibility requirements of subsection 62-730.170(2), F.A.C.?	

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Universal Waste Mercury Containing Devices

Universal Waste Mercury Containing Devices		Potential Violation or AOC cited
38.10	Are mercury containing devices that show evidence of leakage, spillage, or damage that could cause leaks contained?	
38.20	If mercury containing devices are contained, are containers closed, structurally sound, compatible with the contents of the devices and lack evidence of leakage, spillage, or damage that could cause leaks?	
38.30	Are mercury containing ampules removed from devices properly?	
38.40	Is mercury containing equipment that does not contain an ampule opened and the contents managed as required?	
38.50	Are mercury containing device containers labeled with either "Spent Mercury Containing Devices for Recycling", "Universal Waste Mercury Devices", "Waste Mercury Devices", or "Used Mercury Devices"?	
38.60	Are mercury containing thermostat containers labeled with either "Universal Waste Mercury Thermostats", "Waste Mercury Thermostats", or "Used Mercury Thermostats"?	

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Universal Waste Lamps

Universal Waste Lamps		Potential Violation or AOC cited
39.10	Are lamps managed in a manner to prevent breakage or the release of universal waste or components of universal waste and are the packages or containers structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps?	
39.20	Are broken lamps promptly cleaned up and placed in closed, structurally sound containers?	
39.30	If lamps are crushed on-site, are the lamps crushed in the final accumulation container in a manner that prevents the release of mercury vapor or other contaminants and is it done in equipment that is maintained in accordance with the manufacturers instructions, including the frequency of filter changes?	
39.40	Is each lamp or container labeled or marked clearly with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps"?	✓
39.50	Is each container of crushed lamps labeled or marked clearly "Crushed Mercury Lamps"?	

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Universal Waste Batteries

Universal Waste Batteries		Potential Violation or AOC cited
36.10	Are batteries that show evidence of leakage, spillage, or damage that could cause leaks contained?	
36.20	If batteries are contained, are containers closed, structurally sound, and compatible with the battery contents and without leaks?	
36.30	Are batteries managed in such a way that ensures the casing is not breached and remains intact and closed?	
36.40	Are batteries or containers of batteries labeled with either "Universal Waste Batteries" or "Waste Batteries" or "Used Batteries"?	

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Universal Waste Pharmaceuticals

Universal Waste Pharmaceuticals		Potential Violation or AOC cited
40.10	Are universal pharmaceutical wastes that show evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions properly contained?	
40.20	Are containers of universal pharmaceutical waste closed, structurally sound, compatible with the pharmaceutical, and do the containers lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?	
40.30	Are damaged containers that are leaking, or could reasonably be expected to leak, overpacked in a container that closed, structurally sound, compatible with the pharmaceutical, and do the containers lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?	
40.40	If tanks are used, do they meet the requirements of 40 CFR Part 265 Subpart J, except for 40 CFR 265.197(c), 265.200, and 265.201?	
40.50	Are containers and tanks accumulating universal waste pharmaceuticals clearly labeled "Universal Pharmaceutical Waste" or "Universal Waste Pharmaceuticals" and with the specific hazardous waste codes applicable to the universal waste that is, or may be, placed in the container or tank?	
40.60	If universal pharmaceutical wastes are sorted or mixed into one container, are the pharmaceuticals compatible?	
40.70	If a reverse distributor makes determinations as to whether pharmaceuticals are viable, did the reverse distributor begin the process of distinguishing viable pharmaceuticals from universal pharmaceutical or hazardous waste within 14 days of receipt of a complete shipment of returns from a handler, and in no event more than 21 days from the receipt of the first installment of a partial shipment?	
40.80	If a reverse distributor makes determinations as to whether pharmaceuticals are viable, did the reverse distributor complete the universal pharmaceutical waste or hazardous waste identification process within 21 days of receipt of the complete shipment, and in no event more than 30 days from receipt of the first installment of a partial shipment?	
40.90	Does the reverse distributor keep a record of each shipment of returns that clearly demonstrates the date on which the shipment was received and the date on which the reverse distributor or wholesaler determined the universal pharmaceutical waste or hazardous waste status of all items in the shipment?	
40.100	If a small quantity handler of universal pharmaceutical waste, does the handler accumulate universal pharmaceutical waste for no more than one year from the date the universal waste was generated, unless the requirements of 62-730.186(8)(c) are met?	
40.110	If a large quantity handler of universal pharmaceutical waste, does the handler accumulate universal pharmaceutical waste for no more than six months from the date the universal waste was generated, unless the requirements of 62-730.186(8)(c) are met?	
40.120	Is the handler able to adequately demonstrate the accumulation time for the universal pharmaceutical waste? How is compliance with the time limit documented?	
40.130	Are universal waste pharmaceutical handler employees provided with training that ensures they are thoroughly familiar with proper waste management procedures relevant to their responsibilities during normal facility operations and emergencies?	
40.140	Do employees successfully complete training within three months after the date of their employment at or assignment to the handler's facility?	
40.150	Is the training conducted annually?	
40.160	Is the training documented, including the employee's name, signature, date of hire or assignment, date of training, and type of training, and is the documentation maintained at the handler's place of business for three years?	
40.170	Are all releases of universal pharmaceutical waste, including those indoors, contained immediately?	
40.180	Does the handler only ship universal pharmaceutical wastes to a handler or a reverse distributor who has notified the Department pursuant to subsection 62-730.186(6)?	
40.190	Does the reverse distributor only ship universal pharmaceutical wastes to a destination facility permitted pursuant to 40 CFR Parts 264 and 270?	
40.200	If a handler of universal pharmaceutical waste self transported universal pharmaceutical waste off-site, did the handler comply with the transporter requirements of 40 CFR Part 273 Subpart D while transporting the universal pharmaceutical waste?	
40.210	If the handler transported universal pharmaceutical waste to a reverse distributor or another handler, did the handler provide written information sufficient to allow the reverse distributor or another handler to make knowledgeable decisions about the safe handling and proper disposal of the universal pharmaceutical waste?	
40.220	Prior to sending a shipment of universal pharmaceutical waste to a destination facility, did the originating handler ensure the destination facility agreed in writing to receive the shipment? Note: One agreement to accept universal waste from a handler can cover more than one shipment.	

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Universal Waste Pharmaceuticals		Potential Violation or AOC cited
40.220		
40.230	If a handler's shipment of universal pharmaceutical waste was rejected by the destination facility, did the originating handler receive the waste back or agree with the destination facility on an alternate facility to which the shipment will be sent?	
40.240	If a destination facility receives a shipment containing hazardous waste that is labeled universal pharmaceutical waste but is not in fact universal pharmaceutical waste, did the destination facility immediately notify the Department of the mislabeled shipment and provide the name, address, and telephone number of the originating handler?	
40.250	If a handler sent universal pharmaceutical waste to a foreign destination which is one of the following designated member countries of the Organization for Economic Cooperation and Development (OECD): Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Japan, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland, Turkey, and United Kingdom, did the shipment meet the requirements of 40 CFR Part 262 Subpart H?	
40.260	If a handler sent universal pharmaceutical waste to a foreign destination which is not one of those countries listed in subparagraph 62-730.186(11)(j)(1), did the handler: comply with the requirements applicable to primary exporters in 40 CFR 262.53, 262.56(a)(1) through (4), (6), and (b), and 262.57 / export only upon consent of the receiving country and in conformance with the EPA Acknowledgement of Consent / and provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter who transports the shipment for export?	
40.270	Does the handler keep a record of each shipment of universal pharmaceutical waste sent to another handler, a reverse distributor, destination facility, or foreign destination, and does the record consist of a written receipt, manifest, bill of lading or other written documentation?	
40.280	Does the handler retain the records at its place of business for at least three years from the date of shipment and does the record for each shipment of universal pharmaceutical waste include the name and address of the handler, reverse distributor, destination facility or foreign destination to which the universal pharmaceutical wastes were sent / the quantity of universal pharmaceutical waste sent / and the date the shipment of universal pharmaceutical waste left the handler's facility?	