



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

FACILITY INFORMATION:

Facility Name: Technology Conservation Group Inc
On-Site Inspection Start Date: 12/28/2016 **On-Site Inspection End Date:** 12/28/2016
ME ID#: 116615 **EPA ID#:** FLR000214973
Facility Street Address: 591 S Easy St, Lecanto, FL 34461-9480
Contact Mailing Address: 705 S Easy St, Lecanto, FL 34461-9480
County Name: CITRUS

NOTIFIED AS:

CESQG (<100 kg/month)

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth J Wilkins, Environmental Specialist
Other Participants: Elizabeth Knauss, Environmental Consultant; Vickie Andrews, Warehouse Manager;
Bill McGurl, Warehouse Manager; Steve Craig, Corporate Compliance Director

LATITUDE / LONGITUDE: Lat 28° 51' 16.4974" / Long 82° 27' 16.5368"

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

TYPE OF OWNERSHIP: Private

Introduction:

Technology Conservation Group ("facility") was inspected on December 28, 2016 by the Florida Department of Environmental Protection ("Department") to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility notified as a conditionally exempt small quantity generator ("CESQG") of hazardous waste in January 2016. The facility obtained separate EPA identification numbers for three contiguous properties, including four buildings in a small industrial area in Lecanto, Citrus County. Since these properties are contiguous, they should be considered one "facility" for the purposes of hazardous waste regulation: FLR000127134 - 715 S. Easy St., FLR000214973 - 591 S. Easy St., FLR000214569 - 1181 W. Gulf to Lake Highway. Mail is addressed to the office: 705 S. Easy St. The company is an electronics de-manufacturer and was previously located in Crystal River. The previous facility was inspected by the Department's hazardous waste program in 2005. This is the facility's first inspection at the new location. Steve Craig, Corporate Compliance Director, Vickie Andrews and Bill McGurl, Warehouse Managers, provided information during the inspection. Mr. Craig was not available on the first day of the inspection, but Ms. Andrews and Mr. McGurl provided access to the facility and explained operations. The inspection verified that the facility was a conditionally exempt small quantity generator of hazardous waste. They dispose of their waste through Citrus County's Hazardous Waste CESQG program. They also notified as a transporter of universal waste; they have two trucks but plan to relocate one to another facility, located out of state.

Process Description:

705 S. Easy St. includes the business offices of the company. The company has two box trailers for transport of materials, but does not transport items that are classified as USDOT hazardous materials.

751 S. Easy St. was previously used for receiving and disassembly, but is now being used for storage of items being held for off-site shipment.

- The building held Gaylord's and pallets of marketable electronics awaiting bulk shipments to customers, along with a large number of cartons of expired, unused medical syringes.
- One Gaylord of broken CRTs was on site, dated 11/28/16, along with approximately 13 skids of intact

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CRTs. The skids were shrink wrapped, labeled and marked with accumulation start dates, however not all the dates were able to be checked due to lack of aisle space.

- Intact and broken CRT's are exported to Mexico through Technologies Displays Americas of Calexico, California.
- Ms. Andrews said that CRTs are not stored more than a year, but are held until a truckload amount is ready to be shipped.
- The loading dock behind building 751, contained drums of baghouse dust from the shredding operation.
- Additional containers, including containers of used filters were stored in a semi container adjacent to the dock.
- Some of the drums on site had accumulation start dates of 2015.
- Aisle space did not allow all drums to be inspected. Baghouse dust is sampled for TCLP analysis by Hydro Environmental Technology. The most recent analysis indicated that the waste was not characteristically toxic. The facility typically exports the material for recovery of precious metal content.

181 W. Gulf to Lake Highway; this building is the most recent acquisition and larger than 751.

- Operations include receiving, testing, data wiping, and sorting for resale, if the customer contract allows.
- Resale items are marketed through finished goods vendors and Ebay.
- Batteries removed from equipment are sorted by type and packaged for shipment off site.
- The company generally waits for a full truckload before shipment.
- Some containers of lithium batteries have been stored on site since July 2015. Paperwork showed Lithium batteries were shipped off four times in 2016. The quantity shipped indicates that batteries have not been accumulated speculatively.
- Since the first day of the inspection, the facility has revised its internal inspection procedures to track the oldest accumulation start date and ensure that individual containers are not held on site for longer than a year.
- The building's waste storage area is in the northeast corner, and items held for disposal included two 55-gallon metal drums of hazardous waste, one 55-gallon metal drum of aerosols and one 55-gallon metal drum containing adhesives.
- In addition, one 3-gallon metal pail held one expired roadside flare.
- Additional, three 3-gallon metal pails held mercury thermometers and switches, properly labeled as universal waste.
- Many closed, 55-gallon metal and plastic drums of lithium and alkaline batteries were labeled as universal waste. All batteries except for lead acid batteries are shipped to MCT in Georgia for recycling. Lead acid batteries are sent to RSR in Texas.
- A container of lead dross was received from one customer, and was held for transport to AIM in Rhode Island for recycling.

591 S. Easy St., houses the shredder operations, along with additional de-manufacturing.

- Gaylord's of incoming material are received and entered into the company's electronic materials tracking database.
- Items are held a short time before processing, to allow the customer time to recall items shipped by mistake.
- Before processing, containers are checked for nonconforming material, which is separated and segregated until its management can be reconciled with the customer. In most cases, rejected items are returned, but occasionally the company must arrange for disposal. Waste that is not returned to the customer is packaged as hazardous waste and disposed of through Citrus County's CESQG waste collection program. Disposal receipts are retained. The company also maintains a tracking log listing each item, its source, and the date it was received.
- Batteries are also removed from equipment in this building prior to disassembly or shredding, and are packaged for shipment to another handler.
- Spent lamps were observed by the Department in an uncovered container. Facility corrected the violation at the time of the inspection. Paperwork showed the facility uses their trucks to ship spent lamps to AERC in Melbourne. FLD984262782.
- After removal of high value parts, the remaining devices are processed through the shredder. The shredder automatically separates ferrous metals, nonferrous metals and plastics.
- Emissions from the device are controlled by a Donaldson Torit using three banks containing eight filters each.
- Dust is collected in three 55-gallon metal drums, one under each bank. In addition, the exhaust is

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filtered through a HEPA filter.

- All filters are changed simultaneously, usually once every 3 to 6 months, depending on pressure drop.
- The Department observed one unlabeled 55-gallon metal drum of used oil on a containment pallet. The drum was labeled during the inspection.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.13(d)(1)
Explanation:	At the time of the inspection, spent lamps were not being stored inside a closed container or package.
Corrective Action:	CORRECTED: A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. At the time of the inspection, the facility corrected the violation.

Type:	Violation
Rule:	279.22(c)(1)
Explanation:	At the time of the inspection one (1) unlabeled 55-gallon metal drum containing used oil was observed.
Corrective Action:	CORRECTED. Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." Violation was corrected at the time of the inspection.

Conclusion:

At the time of the inspection the facility was found in violation of the regulations governing CESQG's. Having corrected the violations, they have returned to compliance. No further action is required by the Department.

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2.0 - CESQG 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.

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5			✓
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

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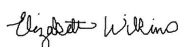
Signed:

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.

Elizabeth J Wilkins

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

SWD - FDEP

ORGANIZATION

01/17/2017

DATE

Elizabeth Knauss

Inspector NAME

Environmental Consultant

Inspector TITLE

SWD - FDEP

ORGANIZATION

Steve Craig

Representative NAME

Corporate Compliance Director

Representative TITLE

Technology Conservation Group

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.

Vickie Andrews

Representative NAME

Warehouse Manager

Representative TITLE

Technology Conservation Group

ORGANIZATION

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Bill McGurl

Representative NAME

Warehouse Manager

Representative TITLE

Technology Conservation Group

ORGANIZATION

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Report Approvers:**Approver:** Richard M Vaughn**Inspection Approval Date:** 01/17/2017