



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

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**FACILITY INFORMATION:**

**Facility Name:** EQ Florida Inc

**On-Site Inspection Start Date:** 05/25/2017      **On-Site Inspection End Date:** 06/07/2017

**ME ID#:** 21659      **EPA ID#:** FLD981932494

**Facility Street Address:** 2002 N Orient Rd, Tampa, FL 33619-3356

**Contact Mailing Address:** 7202 E 8th Ave, Tampa, FL 33619-3380

**County Name:** HILLSBOROUGH

**NOTIFIED AS:**

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

**INSPECTION TYPE:**

Routine Inspection for TSD Facility facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Elizabeth Knauss, Environmental Consultant

**Other Participants:** Shannon Kennedy, ES II; Don Locke, General Manager; Ken Dean, Operations Manager; Stuart Stapleton, EHS Manager

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

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A routine hazardous waste compliance inspection was conducted at EQ Florida, d/b/a US Ecology. The facility operates under a combined hazardous waste and solid waste permit, which was modified effective December 8, 2016. The modification clarified how hazardous waste will be managed while staged at the facility before and after treatment. The permit expires April 1, 2019. Mr. Don Locke, the new facility general manager participated in the inspection, along with Ken Dean and Stuart Stapleton. The facility includes a hazardous waste container storage building, storage trailers and a small office building on the north side of 9th Avenue. The main office building, including the laboratory and equipment maintenance bays is on the south side of the street, along with trailer parking areas and the waste processing building.

**Process Description:**

The inspection began in the trailer storage area in the south part of the facility. The trailers in this area were all tarped and labeled in accordance with permit requirements. Each trailer label included the treatment batch number. One batch of waste (352) consisting of four roll offs was on site awaiting analytical results. The roll offs were tarped and properly labeled, with a start date of 5/24/17. Two batches of waste (345 and 348) were also on site and needed to be re-treated as analytical results indicated that the waste had been decharacterized but did not meet treatment standards for nickel, an underlying hazardous constituent in the waste. Batch 345 consisted of three roll offs with a start date of 5/9/17, and batch 348 consisted of four roll offs with a start date of 5/15/17. These were also tarped and labeled as treated hazardous waste. All of the roll offs except for one were within pop up containment, although this is not required as the waste had no free liquids according to the paint filter liquid test.

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Also on site was a container of solid waste awaiting solidification (under roof), a roll off of cardboard and another of scrap metal generated on site, and empty tanker and an inbound trailer that had been received 5/24 awaiting unloading. The treatment tank was inspected later, as respiratory protection is required when hazardous waste is being treated. A warning light is used to notify staff not to enter the building during treatment.

The container storage building on the north part of the site was inspected next. EQ staff open lab packed containers in building's south storage bay. The staging area in the front of the bay had a number of containers where smaller containers and containers removed from lab packs are consolidated into larger containers. This activity was referred to as a "pour up." The receiving container is numbered and bar coded, and when material is added the bar code of the original container is scanned to show where the material was disposed. The containers have "hazardous waste" shipping labels, with accumulation start dates and waste codes but the containers are re-labeled when the container is shipped for disposal. The sumps in all three storage bays were clean and dry, aisle space was adequate, containers were closed, and none were found to be leaking. Emergency equipment was in place and functional, although facility inspection records note a water leak in the fire suppression system. EQ has contracted for a replacement as a capital improvement project, and the system repair was expected to take place within a few weeks.

In the center bay, several drums were found that appeared to have residue on the outside. One drum, part of a shipment transported from Allied Roofing by EQ Industrial Services, had a ring that was installed upside down, which may have lead to leaks during transport. Allied Roofing indicated that the company is a conditionally exempt generator on manifest 016461483 JJK, however EQ should not have accepted the drum for transport without checking the ring and gasket.

In the front of the north bay, two trailers were being loaded with containers. These were tagged as treatment trailers, and were being loaded with materials to be transferred to the hazardous waste treatment building. The loading start date was on each trailer, along with the date before which the trailer must be moved.

Another trailer was loaded with items identified as non hazardous waste, including at least one container labeled as used oil and others of antifreeze that were awaiting transfer to the treatment building. There, the containers holding used oil are consolidated for off site recycling. According to the facility, materials identified as used oil are not solidified for landfilling.

Two outbound trailers being loaded for shipment to Rineco and TWI were at the south bay. These were marked with the destination, the manifest number, the date the trailer loading started and the "must ship by" date. The side of the bay next to the ramp held a number of closed containers of universal waste batteries, and several pallets of electronic equipment and non hazardous refrigerant gas.

In front of the center bay, Gaylord containers and drums were staged to be repackaged, with non hazardous latex household waste paint being loaded into a roll off container for transfer to the Covanta waste to energy incinerator in Lake County. Containers included regulated business waste from Goodwill and the Florida DOT, not just household waste. In addition, containers of aerosol cans were staged for consolidation in this area.

In the container storage area adjacent to the hazardous waste treatment tank, nine 275-gallon IBCs of waste sulfuric acid (D007) from Mosaic Riverview were awaiting treatment. One of the containers was damaged, but not leaking. Mr. Dean said that this had occurred when the IBC was picked up by forklift for unloading, and that the contents would be transferred to the tank by pump. Forklift drivers must be trained to ensure compliance with 40 CFR 264.173(b). Some waste had splashed out of the treatment tank and onto the adjacent wall. The Department recommends regular cleaning of this wall and the outside of the tank, as part of the facility procedures to comply with the requirement to remove releases into the tank secondary containment system within 24 hours under 40 CFR 264.193(c)(3). It is also recommended to restrict the amount of waste and treatment chemicals placed into the unit at any one time to prevent splashing during mixing.

The solid waste holding area held containers of used oil, antifreeze, asbestos waste, drill cuttings and other items. A Gaylord box was being loaded with solid waste that was being shredded, mostly plastics. No batteries were observed. The solid waste solidification process was not inspected during this visit.

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The company no longer services any vehicles on site. No parts washers or used oil tank was present. The lab conducts fingerprint analyses of 10% of the containers received, and also conducts treatability testing in order to determine the best recipe for treating the waste being received. For each batch, retain samples are collected, and blended to determine waste compatibility before treatment. Samples are appropriately labeled, and are managed as hazardous waste or treated after retention times are met. Samples are usually consolidated for discard quarterly.

Records were reviewed on June 7, 2017, including incoming manifests, waste profiles, batch treatment records, waste analyses and disposal records. The facility maintains an electronic waste tracking system that allows incoming waste and associated documents to be tracked to outgoing shipments, including tracking through the waste treatment process. Facility inspection records were reviewed. Deficiencies and corrective actions were noted on the inspection forms. Training records are maintained and training appeared to be up to date. The facility contingency plan and financial assurance were reviewed and are up to date, and documentation is maintained on site and in the Department's electronic files.

**Conclusion:**

Although several recommendations are made in this report, the facility was found to be in compliance with its permit during this inspection.

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**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.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
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	✓		


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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 Knauss

Environmental Consultant

**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR TITLE**

FDEP - SWD

06/28/2017

**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**

Shannon Kennedy

ES II

**Inspector NAME****Inspector TITLE**

FDEP - SWD

**ORGANIZATION**

Ken Dean

Operations 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.

Don Locke

General Manager

**Representative NAME****Representative TITLE**

US Ecology

**ORGANIZATION**

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Stuart Stapleton

EHS Manager

**Representative NAME****Representative TITLE**

US Ecology

**ORGANIZATION**

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**Report Approvers:**

**Approver:** Elizabeth Knauss

**Inspection Approval Date:** 06/28/2017