



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

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**FACILITY INFORMATION:**

**Facility Name:** US Ecology Tampa Inc  
**On-Site Inspection Start Date:** 06/20/2018      **On-Site Inspection End Date:** 06/20/2018  
**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      **Contact Phone:** (813) 319-3423

**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:** Javier Garcia, Environmental Engineer; Melissa Madden, Environmental Consultant - Solid Waste; Ken Dean, EHS Manager; Ben Hsu, ES I; Abelardo "Macho" Cruz, Operations 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 joint hazardous and solid waste inspection was conducted at EQ Florida, d/b/a US Ecology to determine the facility's compliance with its permit. A simultaneous USEPA oversight inspection was conducted at the same time. Javier Garcia with USEPA is preparing a separate report, and a solid waste compliance inspection report is also being prepared. Ken Dean represented US Ecology during the inspection.

The facility's hazardous waste permit, 34875-HO-012, was modified effective October 17, 2016 to address certain operational issues related to hazardous waste treatment activities and to add K062 waste to the list of wastes approved for on-site treatment. The permit expires on April 1, 2019. The facility currently has about 60 employees.

**Process Description:**

The facility operates a hazardous waste container storage facility on the north side of East 8th Avenue, and has a hazardous and solid waste treatment building on the south side of the road, along with offices and parking areas for trailers and roll off containers. The inspection began with the waste treatment building, which has separate mix tubs for solid and hazardous waste. The hazardous waste mix tub is certified as meeting 40 CFR 265 Subpart J requirements. As a batch was undergoing treatment, the building could not be entered without respiratory protection. However both areas could be observed from the doors in the west wall of the building.

Treatment chemicals are stored in silos outside the treatment building, and can be conveyed to the hazardous

Inspection Date: 06/20/2018

waste mix tub, where a backhoe is used to blend the treatment chemicals with the waste. Batches can include unloaded drums, IBCs and occasionally the contents of vacuum trucks. Hazardous wastes treated include D002, D004-D011 and K062. The facility uses bar codes on the containers that are received to track each waste movement from the incoming manifest to the treatment batch (if applicable) and the outgoing shipping record. No issues were found with respect to the operating record. The facility is not authorized to treat hazardous waste with organic underlying hazardous constituents. After stabilization is complete, the waste is tested for free liquids by the paint filter liquids test in the in-house lab. Samples are also screened for toxicity and the underlying hazardous constituent metals. Samples that fail initial screening can be re-treated. Samples that pass screening are sent to a NELAC laboratory for analysis, and the waste is shipped to a Subtitle D landfill after results confirm that the waste meets treatment standards.

The treatment building is authorized to store a limited number of containers of hazardous waste prior to treatment, and also has a small explosives magazine used for storing flares, fireworks, small arms ammunition and small explosives actuated devices. At the time of this inspection, the building was within its storage limit, and no issues with the containers could be observed. A box truck was staged at one of the bay doors to receive empty drums for shipment to a re-conditioner. The facility now uses dedicated equipment for mixing hazardous waste, and solid waste is handled separately. Decontamination between batches of hazardous waste is not needed. Treated waste is loaded into roll off boxes, which are then tarped and staged outside the treatment building. Each roll off is labeled "treated hazardous waste," marked with an accumulation start date and marked with the batch and roll off numbers. They are held in the designated bulk container storage area pending receipt of analytical results. After testing is complete, the boxes that meet treatment standards are re-labeled as "treated non-hazardous waste" and scheduled for transport to a landfill. At the time of the inspection, the storage area was under capacity, and all containers were properly closed and properly labeled. Solidified solid waste is managed in a separate area, and roll-offs of this material are both tarped and kept under cover. One roll-off of treated hazardous waste was found to be over-weight, and was waiting for some of the contents to be transferred to a different container.

An issue was noted with one roll off that had just been loaded and was staged outside the treatment building. Free liquids were noted on the pavement under the roll off, and it was not clear whether the liquid was from a leaking rear gasket seal on the container or was condensate from the waste. When the roll off was opened, it was observed to be lined with plastic. The treatment process is exothermic, and liquids from the solidified waste can evaporate and condense on the tarp covering the roll-off. The pH of the liquid on the pavement was in the range of 12 to 13 when tested with pH paper. Based on some staining on the pavement, this has taken place in the past as well. After the inspection, EQ staff said that they would use a pop up containment under the treated waste to contain potential condensate drippage. The containment will be checked and cleaned as needed.

Trailers parked in the Inbound/Outbound staging area and 10 day transfer facility are marked to show the date the trailer was received or loaded, and the date by which the trailer must either be unloaded or leave the facility. No transfer waste was on site more than 10 days.

The hazardous waste container storage building was within its permitted storage capacity. Two containers of flammable liquid were found within 50 ft. of the north property boundary, in a staging area. This was corrected during the inspection. One cubic yard box of damaged containers of waste makeup, categorized as D001, was stored with a removable lid that covered the opening of the box, in accordance with 40 CFR 264.1086(c)(1)(ii). The inner containers were not packaged with absorbent, and some had leaked, as evidenced by odors observed when the lid was removed. This cover is adequate for waste containers that are not in light material service. EQ was requested to document that this closure is not used on containers in light liquid service. Emergency equipment was available and in good condition.

After the inspection, a written procedure was submitted showing that overpacked small containers that might be damaged or leaking are supposed to be contained within an outer plastic bag container. As these are less than 0.26 cubic meters, they are not subject to 40 CFR 264 Subpart CC, although the bags may not be impermeable to perfume vapors. "Pour off" containers used to collect materials emptied from containers are kept closed, except when adding or removing waste.

Containers were staged on the pavement in front of the middle bay of the hazardous waste storage building. These included pallets of propane cylinders that were being managed as unused commercial fuel intended for recycling. Other containers included material collected from household hazardous waste collections such as latex paint containers awaiting crushing and consolidation of the contents. Containers of universal waste

Inspection Date: 06/20/2018

batteries were staged in front of the south bay.

Facility records are largely maintained electronically. A waste inventory is conducted once per day, along with the facility inspections. Container labels could be tracked to the incoming manifest and waste profiles, treatment batch numbers, analytical records and outbound shipping documents. The facility contingency plan and personnel training records were up to date.

### New Potential Violations and Areas of Concern:

#### Violations

Type: Violation

Rule: **264.176**

Explanation: Two containers of waste flammable materials were located in the staging area of the north bay of the container storage building. This was corrected during the inspection.

Corrective Action: Ignitable or reactive waste must be located at least 50 feet from the property boundary.

#### Photo Attachments:

drums in north bay



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Type: Violation

Rule: **264.31**

Explanation: High pH condensate was leaking onto the pavement under a roll-off of treated hazardous waste.

Corrective Action: As a precaution, the facility will be staging bulk containers of treated hazardous waste within a pop-up containment.

#### Photo Attachments:

Inspection Date: 06/20/2018

Condensate from roll off



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**Areas of Concern**

Type: Area of Concern

Rule: 264.1086(c)(5)

Explanation: A container with a capacity of more than 0.46 cubic meters was being used to manage waste makeup, including some ignitable material. The container was not yet closed in accordance with USDOT requirements, but was fitted with a cover meeting Subpart CC Level 1 container management standards. It was not clear whether any of the wastes had more than 500 ppm by weight of volatile organic compounds at the point of waste origination. A copy of the facility's procedure used to determine whether the container is subject to 40 CFR Subpart CC or whether the container is managing hazardous waste in light material service was not available.

Corrective Action: A written procedure for managing these containers was submitted showing that damaged small containers are supposed to be overpacked prior to placement in the larger container. As the inner containers are less than 0.26 cubic meters in size, they are not subject to Subpart CC.

**Photo Attachments:**

Box with lid



Box content



Inspection Date: 06/20/2018

**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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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	✓		

Inspection Date: 06/20/2018

**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 07/19/2018  
**Principal Inspector Signature** **Organization** **Date**

Javier Garcia Environmental Engineer  
**Inspector Name** **Inspector Title**

USEPA Region IV  
**Organization**

Melissa Madden Environmental Consultant - Solid Waste  
**Inspector Name** **Inspector Title**

FDEP - SWD  
**Organization**

Ken Dean EHS Manager  
**Representative Name** **Representative Title**

EQ Florida  
**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.

Ben Hsu ES I  
**Representative Name** **Representative Title**

FDEP - SWD  
**Organization**

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Abelardo "Macho" Cruz  
\_\_\_\_\_  
**Representative Name**

Operations Manager  
\_\_\_\_\_  
**Representative Title**

EQ Florida  
\_\_\_\_\_  
**Organization**

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**Report Approvers:**

**Approver:** Elizabeth Knauss  
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**Inspection Approval Date:** 07/19/2018  
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