



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 30 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Mr. Ken Dean
Environmental, Health and Safety Site Manager
EQ Florida, Inc.
7202 East 8th Avenue
Tampa, Florida 33619

SEP 07 2018
TAMPA, FLORIDA

SUBJ: RCRA Compliance Evaluation Inspection
EQ Florida, Inc.
Tampa, Florida 33619
EPA ID. No.: FLD 981 932 494

Dear Mr. Dean:

On June 20, 2018, the United States Environmental Protection Agency, along with the Florida Department of Environmental Protection (FDEP), conducted a compliance evaluation inspection at the EQ Florida, Inc. facility in Tampa, Florida to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is the EPA RCRA inspection report, which indicates that a potential deficiency of RCRA was discovered during the inspection. The EPA RCRA inspection report takes into consideration information that became available to the EPA after the FDEP issued its report which accounts for differences between the EPA and the FDEP report. A copy of this report has been sent to the FDEP for follow-up.

If you have any questions regarding this matter, please contact Javier E. Garcia, of my staff, by phone at (404) 562-8616 or by email at garcia.javier@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Shannon Kennedy, FDEP Southwest District

RCRA Inspection Report

1) Inspector and Author of Report

Javier E. García
Environmental Engineer
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8616 garcia.javier@epa.gov

2) Facility Information

EQ Florida, Inc.
7202 East 8th Avenue
Tampa, Florida 33619

EPA ID No.: FLD 981 932 494

Primary NAICS: Hazardous Waste Treatment and/or Disposal 562211

3) Responsible Official

Ken Dean, Environmental, Health and Safety Site Manager

4) Inspection Participants

Ken Dean	EQ Florida, Inc.
Abelardo "Macho" Cruz	EQ Florida, Inc.
Melissa Madden	Florida Department of Environmental Protection - Southwest District
Ben Hsu	Florida Department of Environmental Protection - Southwest District
Elizabeth Knauss	Florida Department of Environmental Protection - Southwest District
Javier García	US EPA Region 4

5) Date and Time of Inspection

June 20, 2018
9:30 a.m.

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Chapter 403 of the Florida Statutes (Fla. Stat.), Fla. Stat. §§ 403.702 et seq.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rule 62-730 et seq. of the Fla. Admin. Code Ann. FDEP issued HSWA Permit # 34875/HO/012

9) Previous Inspection History

On May 25, 2017, the FDEP conducted a CEI at the facility and made the following recommendations:

- a. Verify that containers' lids are properly installed when picking up containers at generators' facilities.
- b. Train forklift drivers to ensure proper handling of containers
- c. Increase the frequency the walls adjacent to the hazardous waste treatment tank are cleaned; and,
- d. Restrict the amount of waste and treatment chemicals placed in the hazardous waste treatment tank to prevent splashing during mixing.

10) Findings

Upon arriving at the facility, the inspectors met Ken Dean, presented their credentials and explained the purpose of the inspection. Following the introductions, the inspectors proceeded with the inspection and made the following observations:

Southern Parcel:

Waste Processing Building (WPB)

At the time of the inspection, EQ was treating hazardous wastes (Batch # 525) in the hazardous waste treatment tank (Photo 1). Near the treatment tank, the inspectors observed a roll-off container that contained a portion of treatment Batch # 524 and several hazardous waste containers (Photo 2). In the cabinet where EQ stores explosives wastes, the inspectors observed six hazardous waste containers (Photo 3). All containers were within the areas established in the permit, labeled, dated, closed and appeared to be in good condition.

Waste Transfer Lot

This area is designated in the permit as temporary storage of inbound loads awaiting receipt and unloading; and, for outbound loads waiting for completion of transportation paperwork. At the time of the inspection, the inspectors observed two trailers. One trailer contained inbound hazardous wastes and the other container contained an outbound load of universal wastes (Photos 4 and 5).

Bulk Container Storage Areas (BCSAs)

In the BCSAs, EQ stores treated hazardous wastes in roll-off containers. In the BCSA located along the northern property line, the inspectors observed six roll-off containers (Photos 6 and 7). In front of the WPB, the inspectors observed two roll-off containers which contained treated hazardous wastes (Batch #524). Underneath the containers, the inspectors observed condensate released from one of the container (Photos 8 and 9). The FDEP inspector measured the pH of the released condensate with litmus paper obtaining an approximate reading above 12 (Photo10). The treatment processing sheet for Batch #524 indicated that it did not contain K062 listed hazardous waste. Following the

Permit Condition Part II.B.12 requires EQ to comply with the 15-meter (50-foot) setback rule concerning the locating of ignitable and reactive wastes in containers per 40 C.F.R. § 264.176.

Outside the CSB, the inspectors observed several containers that contained paints and universal waste batteries, and pallets of propane cylinders from household hazardous waste collection activities. EQ was in the process of consolidating these wastes.

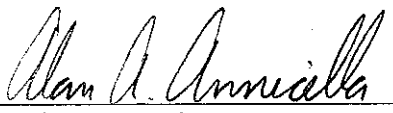
Records Review:

The following records were reviewed during the inspection:

- Waste tracking system for randomly selected waste loads
- Randomly selected waste profiles and treatment residues analysis results from 6/1/2017 to present
- Inspection records from 6/1/2017 to present
- Training records from 6/1/2017 to present
- Randomly selected manifests from 6/1/2017 to present


Following the inspection, the EPA reviewed the manifest for the “damage goods” hazardous waste load observed in Bay 2 of the CSB. In the manifest, EQ described the waste load as “Waste Flammable Liquids, n.o.s. (Damaged Goods) , 3, PG II, (D001). DOT allows the use of this description provided the container meets the lab packs packaging requirements in 49 C.F.R. § 173.12(b). In the manifest, EQ declared that it shipped two boxes of damage goods with a total weight of 1,717 pounds. Pursuant to 49 .C.F.R. § 173.12(b)(2(ii), the gross weight of each completed combination package may not exceed 205 kilograms (452 pounds).

11) Signed

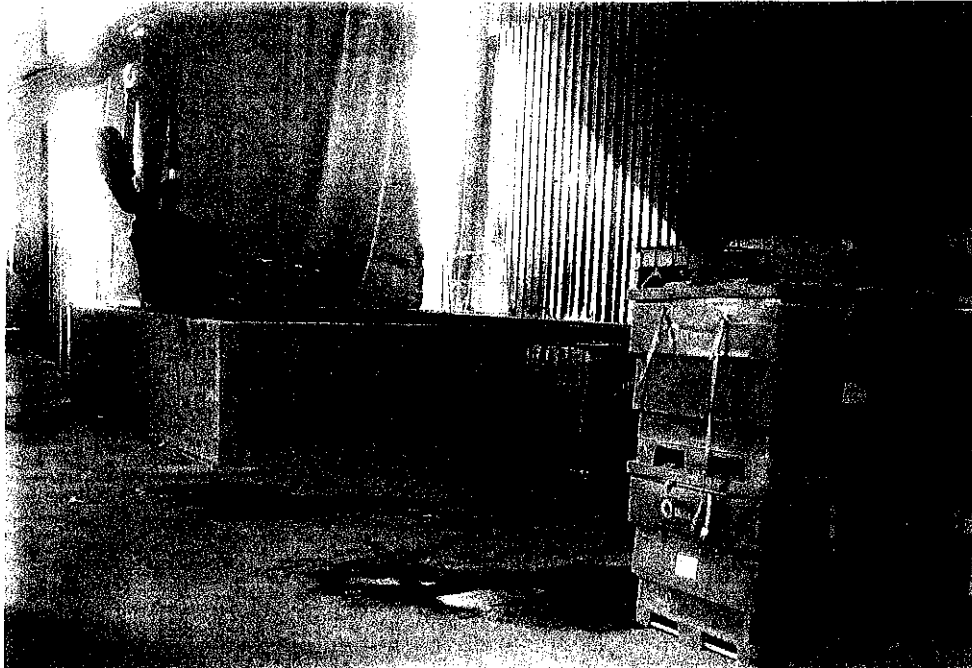

for Javier E. Garcia
Inspector and Author of Report

8/30/18
Date

12) Concurrence and Approval


Alan A. Annicella, Chief
Hazardous Waste Enforcement
and Compliance Section

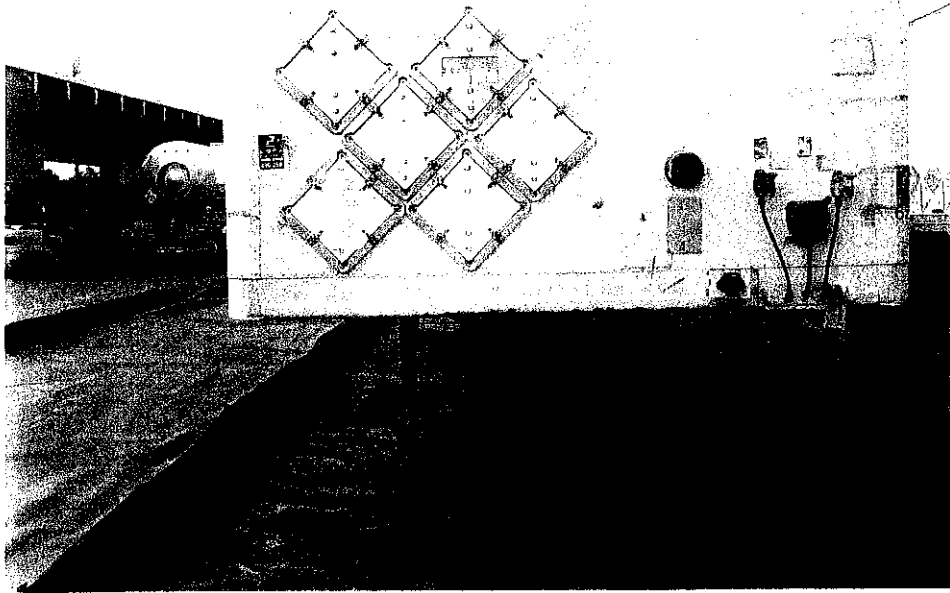
8/30/18
Date



Photograph 1: View of the hazardous waste treatment tank while in operation. Photo taken by Javier García, on 6/20/2018, at 9:31 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



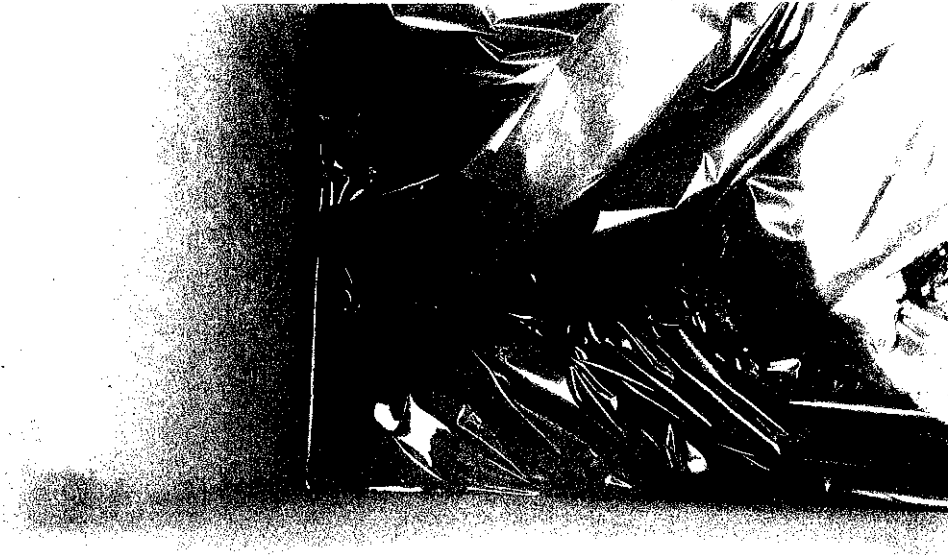
Photograph 2: Roll-off container in the Waste Processing Building. The container was holding a portion of treatment batch # 524. Photo taken by Javier García, on 6/20/2018, at 9:32 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



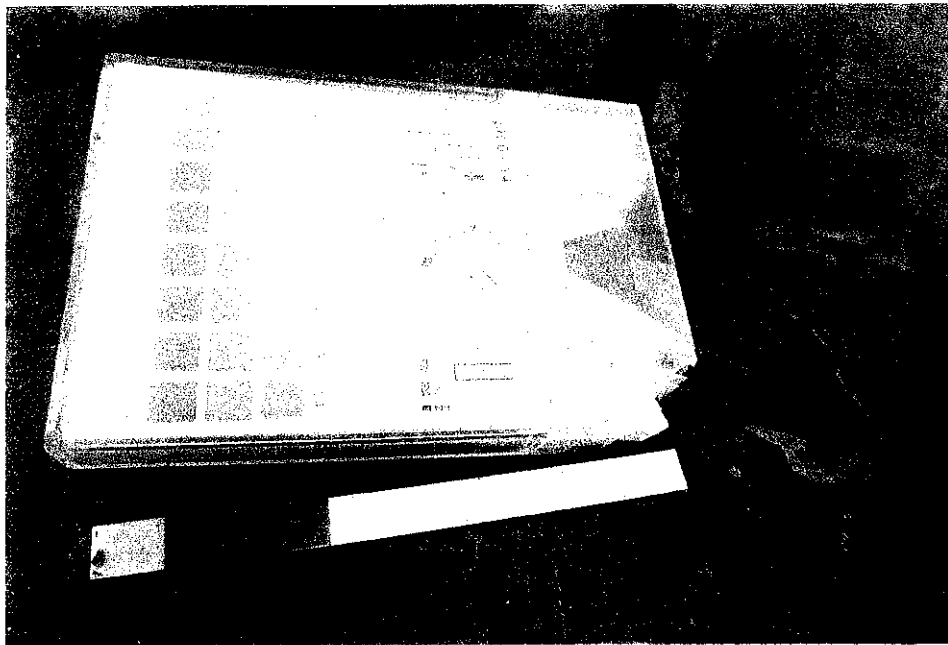
Photograph 5: Outbound trailer in the area designated in the permit as the "Transfer Lot." Photo taken by Javier García, on 6/20/2018, at 9:50 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 6: Partial view of the roll off containers stored in the Bulk Containers Storage Area Outbound along the northern property line. Photo taken by Javier García, on 6/20/2018, at 9:58 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 9: View of the condensate in the roll off container that was leaking (see picture above). Photo taken by Javier García, on 6/20/2018, at 10:15 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 10: View of the litmus paper the FDEP inspector used to measure the pH of the condensate released from a roll off container in front of the WPB. Photo taken by Javier García, on 6/20/2018, at 10:54 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 13: Two 55-gallon containers of flammable hazardous waste in the staging area of Bay 3, that within 50 ft. of the north property boundary Photo taken by Javier García, on 6/20/2018, at 12:16 p.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 14: Location where the two 55-gallon containers of flammable hazardous wastes shown in previous photograph were at. Photo taken by Javier García, on 6/20/2018, at 12:19 p.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951.