



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

FACILITY INFORMATION:

Facility Name: US Ecology Tampa Inc
On-Site Inspection Start Date: 01/14/2019 **On-Site Inspection End Date:** 01/14/2019
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: Ileana A Hernandez, Environmental Specialist II

Other Participants: Beth Knauss, Environmental Consultant; Ken Dean, EHS Compliance Specialist; Don Locke, General 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:

On January 14, 2019, US Ecology Tampa, Inc. ("US Ecology"), was inspected by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal hazardous waste rules. Mr. Don Locke and Mr. Ken Dean accompanied the Department inspectors throughout the facility.

The facility's hazardous waste operating permit, No. 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 renewal application was submitted on October 3, 2018, and is under review. The facility currently has approximately 40 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. A section of pavement in this area is designated for less than 10 day transfer facility operations. The inspection began with the waste treatment building which has separate mix tubs for solid and hazardous waste. The facility uses dedicated equipment for mixing hazardous waste, and solid waste is handled separately - solid waste is solidified in a separate unit, which is managed in accordance with the facility's solid waste operating permit, No. 34757-SO-010. Decontamination between batches of hazardous waste is not needed. The hazardous waste mix tub is certified as meeting 40 CFR 265 Subpart J requirements. As a batch was undergoing treatment at the time of the inspection, the building could

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not be entered without respiratory protection. One of the curtains on the building was also being repaired at the time of the inspection.

Treatment chemicals are stored in silos outside the treatment building, and can be conveyed to the hazardous 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), analytical results, and an 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 the initial screening can be re-treated. Samples that pass screening are sent to a NELAP-accredited 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.

Treated waste is loaded into roll-off trailers, 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 ("BCSA") 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. Solidified solid waste is managed in a separate area, and roll-offs of this material are both tarped and kept under cover.

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. 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 box held various kinds of small containers of paints, sealants, caulks, adhesives, sterno, and some nail polish bottles packaged with absorbent kitty litter. This cover is adequate for waste containers that are not in light material service. Please follow the facility's written procedures 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. Emergency equipment was available and in good condition.

Containers were staged on the pavement in front of the middle bay of the hazardous waste storage building. These containers 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 batteries were staged inn 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

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Type: Violation

Rule: 264.14(b)(2)(ii)

Explanation: During the inspection, it was noted twice that a gate for personnel failed to close properly.

Corrective Action: Please ensure that the gates and any other entrances of the facility remain closed at all times after an operator enters or exits the facility. Maintenance is needed to ensure that the door closes automatically and latches after staff pass through.

Type: Violation

Rule: 264.173(a)

Explanation: Two 55-gallon poly drums containing hazardous waste solids (tetrachloroethane and trichloroethane) were not properly closed.

Corrective Action: Going forward, please ensure that US Ecology is not accepting nor transporting any hazardous waste that is improperly managed.

Photo Attachments:

Improperly closed container

Improperly closed container



Conclusion:

Based on the observations made at the time of the inspection, US Ecology Tampa, Inc., was not operating with the state and federal hazardous waste rules applicable to treatment, storage, and disposal facilities. However, the Department discussed the rule requirements and the areas of concern that were observed with the facility representatives, and the facility has since corrected the deficiencies and returned back to compliance.

*Please note that the Generator Improvements Rule was adopted by Florida on June 18, 2018.

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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.

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	✓		

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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.

Ileana A Hernandez Environmental Specialist II
Principal Inspector Name **Principal Inspector Title**



FDEP-SWD 02/11/2019
Principal Inspector Signature **Organization** **Date**

Beth Knauss Environmental Consultant
Inspector Name **Inspector Title**

FDEP-SWD
Organization

Ken Dean EHS Compliance Specialist
Representative Name **Representative Title**

US Ecology Tampa, Inc.
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 Tampa, Inc.
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.

Report Approvers:

Approver: Shannon Kennedy **Inspection Approval Date:** 02/11/2019