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

SEP 04 2018

SOUTHWEST DISTRICT
TEMPLE TERRACE

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

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. García, of my staff, by phone at (404) 562-8616 or by email at garcia.javier@epa.gov.

Sincerely,

Alan A. Annicella

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

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of EQ Florida, Inc. with its permit and applicable regulations.

8) Facility Description

EQ Florida, Inc. (EQ) is a permitted commercial hazardous waste and solid waste management facility. The existing permit (# 34875-HO-012), modified by the Florida Department of Environmental Protection (FDEP) on October 17, 2016, became effective on December 8, 2016, and expires on April 1, 2019. The permit allows EQ to receive and store hazardous waste in containers; and to treat D002, D004-D011, and K062 hazardous wastes. The treatment system consists of stabilization and solidification in an on-ground tank. The permit prohibits EQ from treating hazardous wastes that contain organic constituents. In addition, EQ has a permit to manage RCRA Subtle D regulated solid wastes. EQ is a large quantity generator of hazardous waste and a transporter of hazardous waste.

The facility is in an industrial area and covers approximately 4.46 acres. The property is divided into two parcels by the East 9th Avenue. The permitted container storage building (CSB) is in the northern parcel. The CSB is a 5,866-square foot warehouse type structure divided into three bays by concrete block walls and fire doors. The bays are designated as: Bay 1, Bay 2, and Bay 3. Each bay has a 1,001-gallon containment sump for emergency spills. A roofed loading/unloading area is attached to the storage building. The CSB has a storage capacity of 50,000 gallons.

The southern parcel consists of a two-story office building with a small laboratory, a Solid Waste Operations Area and the Waste Processing Building (WPB). The WPB is an 8,050-square foot open-sided building that houses two on-ground waste solidification tanks. One tank is used for treatment of hazardous waste and the other tank is used for the treatment of RCRA Subtile D regulated solid wastes. In addition, the building includes a hazardous waste container storage area.

The primary reagents used for treatment of hazardous waste include hydrated lime/lime kiln dust, ferrous sulfate, sodium sulfide/sulfide flakes, and hypochlorite. EQ uses a track hoe to mix the hazardous wastes and reagents in the treatment tank. The treatment consists of mixing compatible liquid hazardous wastes with a neutralizing agent. Following neutralization, solid hazardous wastes and a solidifying agent are added to the tank and mixed. Once the treatment process is completed, EQ collects one grab sample from the batch to determine if the treated waste meets all applicable land disposal restrictions (LDR) treatment standards and passes the paint filter test. After the sample is collected, the treated waste is removed from the treatment tank and placed into lined roll off containers and stored in the Bulk Container Storage Areas (BCSAs) until the analysis results are received. If all requirements are met, the waste load is shipped to a solid waste landfill. If any of the requirements are not met, the batch is returned to the hazardous waste treatment tank and retreated.

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

inspection, Mr. Dean indicated that the facility would store the roll-off containers on a pop up containment structure to contain potential condensate drippage, which would be cleaned as needed.

Permit Condition Part II.A.10, requires EQ to maintain and operate the facility to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Laboratory

In the laboratory, the inspectors observed one 10-gallon container and two 5-gallon containers for the accumulation of hazardous wastes. Also, in the lab, the inspectors observed the bins where sample bottles are stored. All containers were closed, labeled and appeared to be in good condition.

Northern Parcel

Container Storage Building (CSB)

In Bay 2, the inspectors observed a 1-cubic yard container that was being used for the consolidation of ignitable damaged goods (i.e. cosmetic and perfume containers) that contained volatile organic constituents above 500 ppm. The 1-cubic yard container, or outer packaging [as referred to in the regulations promulgated by the Department of Transportation (DOT)] had a polypropylene liner and was covered with a removable metal lid, (Photo 11). No absorbent material was observed inside the outer package (Photo 12)

Following the inspection, Mr. Dean indicated that the UN rating for the outer container was 11G/X/0518/USA/+AA8369/1882/99, and that EQ does not consider the consolidation package to be a lab pack, as defined in 49 C.F.R. § 173.12(b). Nevertheless, in the manifest for this container, 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), including the requirement to surround inner packagings containing liquid with a chemically compatible absorbent material in sufficient quantity to absorb the total liquid contents.

Permit Condition Part II.A.1 requires EQ comply with those sections of 40 CFR Part 124 specified in Subsection 62-730.200(3), F.A.C., 40 CFR Parts 260 through 268, and 40 CFR Part 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from post closure care requirements and all facility-wide corrective action requirements. 40 C.F.R. § 264.1086(c)(1) requires owners or operators storing hazardous wastes in containers subject to Level 1 air emission standards to meet the applicable DOT regulations on packaging hazardous materials for transportation as specified in paragraph (f) of this section.

In the staging area of Bay 3, the inspectors observed two 55-gallon containers of flammable hazardous waste that were within 50 feet of the north property boundary (Photo 13). Mr. Cruz indicated that the containers were received on June 14, 2018. An EQ employee moved the containers to an approved location while the inspectors were in the bay (Photo 14).

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

Alan A. Annicella 8/30/18

for Javier E. Garcia — Date
Inspector and Author of Report

12) Concurrence and Approval

Alan A. Annicella 8/30/18

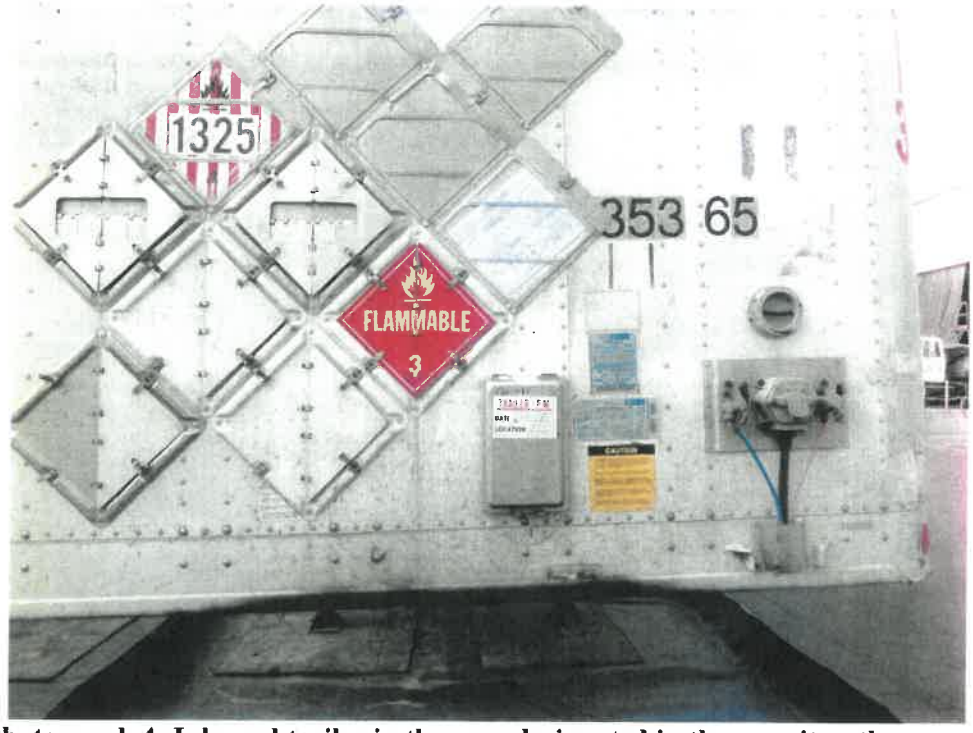
Alan A. Annicella, Chief — Date
Hazardous Waste Enforcement
and Compliance Section

RCRA Compliance Evaluation Inspection
June 20, 2018 - Photographs
EQ Florida, Inc.
Tampa, Florida 33619
EPA ID. No.: FLD 981 932 494

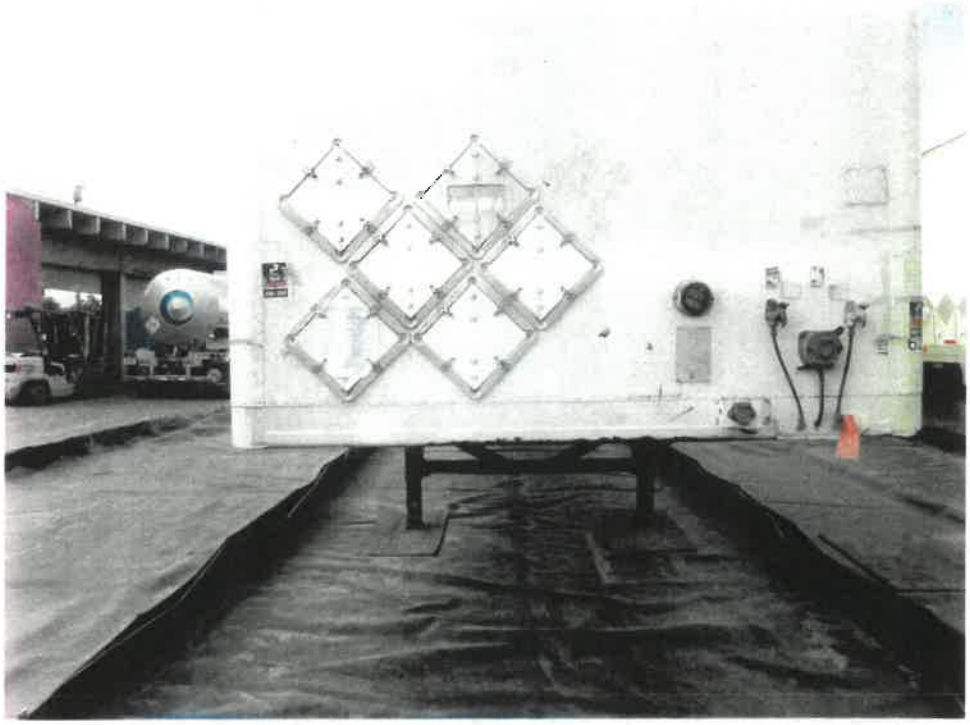
Photograph 1: View of the hazardous waste treatment tank while in operation. Photo taken by Javier García, on 6/20/2018, at 9:31 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951

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 3: Containers inside the cabinet for explosive/reactive wastes. The cabinet in the Waste Processing Building. Photo taken by Javier García, on 6/20/2018, at 9:43 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



Photograph 4: Inbound trailer in the area designated in the permit as the "Transfer Lot." Photo taken by Javier García, on 6/20/2018, at 9:49 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951



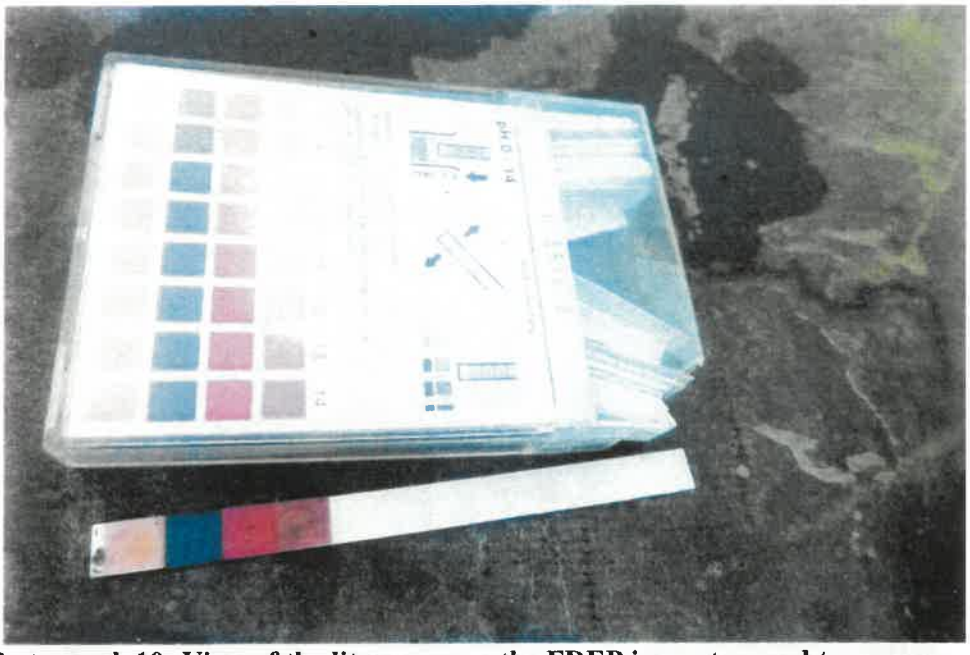
Photograph 5: Outbound trailer in the area designated in the permit as the "Transfer Lot." Photo taken by Javier García, on 6/20/2018, at 9:50 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951

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 7: 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 8: View of the condensate released from one roll off container in the Bulk Containers Storage Area in front of the WPB. Photo taken by Javier García, on 6/20/2018, at 10:09 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 11: One cubic yard container in Bay 2 of the container storage building in used for consolidation of damaged goods (cosmetics) that contained volatile organic constituents. Photo taken by Javier García, on 6/20/2018, at 11:37 a.m. Equipment used: Samsung Camera (Model WB250F)-EPA Property Tag # S75951

Photograph 12: View of the "damaged goods" in the one cubic yard container in Bay 2 of the container storage building. According to Mr. Dean, ziplock type bags contained bottles which integrity may had been compromised. Photo taken by Elizabeth Knauss (FDEP), on 6/20/2018.

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 where 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.