



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

FACILITY INFORMATION:

Facility Name: Conversion Technologies

On-Site Inspection Start Date: 10/02/2024

On-Site Inspection End Date: 10/02/2024

ME ID#: 158701

EPA ID#: FLR000262345

Facility Street Address: 901 McClosky Blvd, Tampa, Florida 33605-6717

Contact Mailing Address: 901 McCloskey Blvd, Tampa, Florida 33605

County Name: Hillsborough

Contact Phone: Data is missing from FIESTA

NOTIFIED AS:

LQG (>1000 kg/month), Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Transporter:** Commercial Waste **Used Oil:** Transporter

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Hazardous Waste Transporter Facility

Routine Inspection for LQG (>1000 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Avery Ghirghi, Inspector

Other Participants: Warren McNelley, Government Operations Consultant III, Michael Kuzelka, Chief Operating Officer

LATITUDE / LONGITUDE: Lat 27° 55' 56.0676" / Long 82° 26' 32.7408"

NAIC: 541614 - Process, Physical Distribution, and Logistics Consulting Services

TYPE OF OWNERSHIP: Private

Introduction:

Conversion Technologies (ConTech) was inspected by the Florida Department of Environmental Protection (Department) on October 2, 2024, to evaluate the facility's compliance with state and federal waste regulations governing Large Quantity Generators (LQGs), Hazardous Waste Transporters (HWT), a Universal Pharmaceutical Waste Transporter (UPW), and Used Oil Transporters (UOT). The facility originally notified as a LQG, HWT and UOT on October 17, 2023. The HWT notification has since expired and has yet to be renewed.. This facility is located within Port Tampa and houses three different companies that operate in cooperation with each other out of the same address. These companies are Conversion Technologies, BioSecure Waste Solutions, and Safe Dispose. BioSecure has a separate notification as an HWT and UPW under EPA ID FLR000232769. A construction company was leasing a portion of the property to assist in port fees while the company is in the process of beginning operations. The construction company does not generate any hazardous waste and are using the site primarily for equipment storage. Conversion Technologies specifically handles the portion of the business that involves the mobile pyrolysis disposal units. While this is Conversion Technologies first inspection by the Department, BioSecure Waste Solutions was last inspected by the Department on June 7, 2023. Michael Kuzelka, the Chief Operation Officer of BioSecure Waste Solutions assisted the Department staff throughout the inspection.

Process Description:

CURRENT OPERATIONS

At the time of inspection, ConTech has not yet begun full operations. ConTech is the portion of the business that handles the mobile pyrolysis units. These units are currently in the process of construction and are awaiting EPA approval. If approved, the machines will be used for on-site disposal of DEA regulated wastes, with the possibility of hazardous waste destruction in the future. These wastes include medications such as morphine

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and medical marijuana (MMU) waste. One pyrolysis machine had been completed, but had suffered water damage from Hurricane Helene. The facility consists of an office trailer, a warehouse, and a storage trailer. ConTech has approximately three employees and operates in shifts as needed, depending on when work orders are received. The facility utilizes all LED light fixtures and is on City of Tampa water and sewer.

On the previous inspection under BioSecure, a van was in the process of construction. The van is now fully constructed and operational and serves as a mobile destruction unit for DEA regulated wastes. When a customer contacts Safe Dispose, they bring the van on-site to the customer. Mr. Kuzelka states that the waste is disposed under the site's DEA license and Safe Dispose offers a means to do so without shipping the waste off-site in its unaltered state. All waste disposals are video recorded, and Mr. Kuzelka provided a video of a disposal for the Department to review while on-site. All DEA waste disposals are done with a witness from Safe Dispose and two witnesses from the customer. The waste is put through a grinder in the van, and is then mixed with wood shavings or cat litter, and glue. This process is completed for all DEA controlled substances until the substances are unrecognizable and unusable. This waste block is then either taken directly to a waste to energy plant in cases of controlled substances like morphine, or is taken back to the port facility for storage prior to disposal at the waste to energy plant.

BioSecure, the third company operating under the same organizational umbrella, handles the biomedical waste transportation side of the operation. BioSecure is operational, and biohazardous waste is stored in red bins prior to pick up for disposal. The red bins are located within an enclosed outdoor metal storage container.

WAREHOUSE

The warehouse currently contains 5-gallon buckets of glue for use in mobile disposal operations. Additionally, red bio-hazard bags were hanging around the perimeter of the warehouse. Mr. Kuzelka states that they are airing them out as they got wet during Hurricane Helene. The warehouse also stores the mobile pyrolysis units that are currently under construction. One propane powered forklift was located within the warehouse. Mr. Kuzelka confirmed that it is serviced by Florida Forklifts, who take any waste off-site at the time of service. One box truck is operated by ConTech that was parked inside the warehouse. It currently houses an in-progress pyrolysis unit.

STORAGE CONTAINER

A metal shipping crate outside of the warehouse is used for storage of the MMU waste prior to disposal at the waste to energy plant. Additionally, there was a tote that contained an estimated 50-100 gallons of Used Oil. The container was labeled with the words "Used Oil". Mr. Kuzelka states that this was left over from the previous tenant of the port berth and he was unsure of how to dispose of it properly. The Department provided Mr. Kuzelka with a list of approved Used Oil Transporters and instructed him to keep the waste disposal receipt once it has been picked up and provide it for Department review.

RECORDS REVIEW

At the time of inspection, ConTech was notified as a Used Oil Transporter and were inspected as such. ConTech notified as a UOT on October 17, 2023; therefore, the Department conducted a review of all available documentation generated since ConTech began operation.

- Used Oil Acceptance Records: No Used Oil has been accepted since notification. Once Used Oil acceptance begins, a daily inspection log will be maintained in the warehouse where the used oil will be stored. This is to ensure that proper storage of Used Oil is maintained. Records will be kept on all service calls and retained work orders will include Used Oil generator information, quantity of Used Oil, and shipment date. Used Oil will not be stored onsite for more than allowable time limit.
- Used Oil Delivery Records: No Used Oil has been delivered since notification. Once delivery begins, records will be kept of all Used Oil deliveries and will contain the amount shipped, the transporter information, and the

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final destination information, including relevant EPA ID numbers.

- Employee Training Records: All employees receive initial and annual training on the proper management of Used Oil, including handling, storage, and spill response and cleanup.
- Rebuttable Presumption Records: The facility had not begun operations of its Used Oil Transportation services at the time of inspection. Once operational, the facility will test each Used Oil shipment to ensure that the total halogen content being transported is below 1,000 parts per million (ppm). Halogen testing records will be kept on-site.
- Proof of Liability Insurance: Records of the facility's Used Oil Handler Certification of Liability Insurance forms were available for review.
- Annual Report for Used Oil and Used Oil Filter Activities: The notification is not yet a year old, so an annual report has not yet been filed. In the future, the annual report will be submitted to the Department for review before renewal.
- The facility displays a valid registration form and identification number in a prominent location inside the facility.

Mr. Kuzelka states that no hazardous waste has been transported and the notifications as an LQG, UOT, UPW, and HWT were filed anticipatorily. Department personnel instructed him to re-notify with the proper notifications, but to wait until he is sure what business operations will look like at full operational capacity. Additionally, BioSecure has a separate ID but is located at the same address, and the business co-mingle and contain roughly the same employees. This will be noted as an area of concern by the Department, and ConTech should renotify with accurate operational details once finalized. One avenue available is to designate only one company with one EPA ID instead of keeping the current separation of BioSecure, Safe Dispose, and ConTech. Another option is to keep the LQG for ConTech and have Safe Dispose and Biosecure act as VSQG consolidation sites. Otherwise, each entity must manage its waste separately.

Currently, the future operational details are dependent on possible investors. Until an investor is secured, the details of the operation, including what type of wastes are accepted and in what quantities, are still uncertain. Since no hazardous waste has been generated or transported, the Department will note the lack of a Contingency Plan as an area of concern. Moving forward, a Contingency Plan must be developed and an Emergency Coordinator designated, or it will be noted as a violation. Another option for ConTech is to renotify as a VSQG until full operations as an LQG and consolidation begin. Educational material on the limits and different requirements for VSQGs and LQGs were provided to Mr. Kuzelka. Since no waste has been generated or transported, no manifests were available for review.

Training records were available for Mr. Kuzelka and the other employee that assists in mobile DEA regulated waste destruction. These are the only two employees that handle the mobile DEA waste destruction. Training included Department of Health trainings on blood borne pathogens and safe bio-hazardous waste disposal, as well as HAZCOM training. Department staff instructed Mr. Kuzelka that if Conversion Technologies plans on disposing of hazardous waste, proper hazardous waste disposal and handling training must be provided for all staff that handle hazardous waste.

Once the operation of the mobile pyrolysis machines begins, if these machines will treat hazardous waste, ConTech must obtain the required Treatment, Storage, and Disposal permitting from the Department. If the required permitting for these hazardous waste treatment units is not obtained prior to operation, ConTech could be subject to formal enforcement. A waste analysis through TCLP must be performed on the waste ash produced from the pyrolysis machines to determine if it is characteristically hazardous to ensure proper disposal.

FACILITY STATUS

Based on the review of ConTech's waste disposal records from the last three years, there have been no shipments of Hazardous Waste. ConTech is notified as an LQG, but does not generate any hazardous waste at this time. If ConTech wishes to maintain its LQG status, then they must comply with all applicable rules and regulations moving forward.

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New Potential Violations and Areas of Concern:**Area of Concern**

Type:	Area of Concern
Rule:	262.18(a)
Question Number:	1.1
Question:	Has the facility notified with correct status? 262.18(a)
Explanation:	Operations of the facility does not currently match its operational status.
Corrective Action:	Since final operational details are still unknown, ConTech will renotify with the correct notification status once details are finalized. ConTech will contact the Department prior to starting operations to ensure all proper permits have been obtained.

PHOTO ATTACHMENTS:

Prototype Pyrolysis Machine



Hurricane damaged Pyrolysis machine and drying Biohaz bags



Glue Product Storage



Outdoor Storage Container and Used Oil Tote

**Conclusion:**

At the time of inspection, Conversion Technologies was operating in compliance with state and federal regulations governing Used Oil Transporters.

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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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4.0: Large Quantity Generator 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.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.18(a)	✓		
4.3	Are any hazardous wastes treated or disposed of on site? 268.7(a)(5), 62-730.240(1)			
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.6	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)	✓		
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.16	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓

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4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)			✓
4.19	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
Item No.	The Manifest	Yes	No	N/A
4.21	<p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1)</p> <p>Item 1. Generator's U.S. EPA Identification Number</p> <p>Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p>Item 3. Emergency Response Phone Number</p> <p>Item 4. Manifest Tracking Number</p> <p>Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p>Item 6. Transporter 1 Company Name & U.S. EPA ID Number</p> <p>Item 7. Transporter 2 Company Name & U.S. EPA ID Number</p> <p>Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p>Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</p> <p>Item 10. Containers (Number and Type)</p> <p>Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p>Item 12. Units of Measure (Weight/Volume)</p> <p>Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p>Item 14. Special Handling Instructions and Additional Information</p> <p>Item 15. Generator's / Offeror's Certifications</p> <p>Item 16. International Shipments (Import or Export must be noted)</p> <p>Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p>Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p>Item 19. Hazardous Waste Report Management Codes (On returned copies only)</p> <p>Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p>			✓
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)			✓
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)			✓
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)			✓
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)			✓
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓

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4.27	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) The next non-rail transporter? The Designated Facility if transported solely by rail? The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)			✓
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)			✓
4.33	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
4.34	If YES, did the generator meet the requirements of 262.23(f)			✓
Item No.	Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) Generator's Name and Address? Generator's EPA ID Number? Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	Accumulation Requirements	Yes	No	N/A
4.40	Does the facility accumulate hazardous waste on-site prior to treatment or disposal?			
4.41	If YES identify applicable accumulation units: Containers - Complete Container Checklist also CC as applicable Tanks - Complete Tanks Checklist also AA, BB, and CC, as applicable Drip Pads - Complete Drip Pad Checklist Containment Buildings - Complete Containment Buildings Checklist			
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.17(b)			✓
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 262.17(b)			✓

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4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 262.17(a)(8)(iii)? 262.17(a)(8)(iii)			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.17(a)(5)(i)(C)			✓
4.46	Has the generator ensured an indication of the hazards of the content is visible for inspection on each hazardous waste container? 262.17(a)(5)(i)(B)			✓
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			✓
4.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)			✓
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)			✓
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)			✓
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(2)			✓
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)			✓
4.54	Has the generator marked satellite containers with the words "Hazardous Waste" AND an indication of the hazards of the contents? 262.15(a)(5)(i), 262.15(a)(5)(ii)			✓
4.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? (If No, mark all items below as N/A.)			
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.17(a)(5)(i)(A)			✓
Item No.	Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.17(a)(1)(ii)			✓
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.17(a)(1)(iii)			✓
4.60	Does the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.17(a)(1)(iv)(A)			✓
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.17(a)(1)(iv)(B)			✓
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.17(a)(1)(v)			✓
4.63	Does the generator properly document the weekly inspections? 62-730.160(3)			✓
4.64	This should include at a minimum: (Check items below that are not in compliance) Date and Time of inspection Legibly printed name of inspector Number of hazardous waste containers Condition of containers Notation of observations made Date and nature of any repairs or remedial actions			
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 262.17(a)(1)(vi)(A)			✓

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4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(A)			✓
4.67	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 262.17(a)(1)(vii)(B)			✓
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.17(a)(1)(vii)(C)			✓
Item No.	Personnel Training	Yes	No	N/A
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 262.17(a)(7)(i)(A)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 262.17(a)(7)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 262.17(a)(7)			✓
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 262.17(a)(7)			✓
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 262.17(a)(7)			✓
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 262.17(a)(7)			✓
4.75	Does the generator review training annually, at least once each calendar year? 262.17(a)(7)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 262.17(a)(7)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 262.17(a)(7)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 262.17(a)(7)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 262.17(a)(7)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 262.17(a)(7)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 262.17(a)(7)	✓		
Item No.	Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 262.251	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 262.252(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.252(b)	✓		

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4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 262.252(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 262.252(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 262.253	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 262.254(a)			✓
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 262.254(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 262.255	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 262.256(a)(2)			✓
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 262.256(a)(3)			✓
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 262.256(a)			✓
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 262.256(a)			✓
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 262.256(b)			✓
Item No.	Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 262.260(a)			✓
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 262.260(b)			✓
4.98	Does the contingency plan describe actions to be taken in response to the following:262.261(a)			
4.99	Fires? 262.261(a)			✓
4.100	Explosions? 262.261(a)			✓
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 262.261(a)			✓
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 262.261(b)			✓
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 262.261(c)			✓
4.104	Does the plan list names and emergency phone numbers of emergency coordinator(s)? 262.261(d)			✓
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 262.261(d)			✓
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 262.261(e)			✓

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4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 262.261(f)			✓
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 262.262			✓
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 262.262(a)			✓
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 262.263			✓
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 262.264			✓
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 262.265? 262.265			✓
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 262.265(c)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.11(f)			✓
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)			✓
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)			✓
4.117	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.83(b)			✓
4.119	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

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6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) Exemption Type - Tolling Agreement Exemption Type - VSQG Bill-of-Lading			✓
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)			✓
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)			✓
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)			✓
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)			✓
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)			✓
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)			✓
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)			✓
Item No.	Rail Transporters	Yes	No	N/A

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6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓

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6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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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

Avery Ghirghi**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**10/23/2024**Date**Warren McNelley**Inspector Name**Government Operations
Consultant III**Inspector Title**DEP**Organization**Michael Kuzelka**Representative Name**Chief Operating Officer**Representative Title**Biosecure Waste Solutions**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:**Michael Miller**Inspection Approval Date:**10/24/2024