



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** Routine Complaint Follow-Up Permitting Pre-Arranged

FACILITY NAME E.E.F.I, Inc. EPA ID # FLR000006353

STREET ADDRESS 314-B West Landstreet Rd, Orlando 32824

MAILING ADDRESS Same

COUNTY Orange PHONE 407-855-0141 DATE 9-18-01 TIME 1010

NOTIFIED AS: N/A

CURRENT STATUS:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

2. **APPLICABLE REGULATIONS:**

- | | | | |
|---------------------------------------|--------------------------------------|--|--------------------------------------|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input type="checkbox"/> 62-740, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Ann Hopkins

4. **INSPECTION PARTICIPANTS:**

John White - FDEP
Leah Proffitt - FDEP

Ann Hopkins – EEFI, Inc.

5. **LATITUDE/LONGITUDE:** 28° 26' 09.43" / 81° 22' 50.90"

6. **SIC Code:** 4212 Local Shipping / 4213 Shipping

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**

9. INTRODUCTION:

On September 18, 2001, John White and Leah Proffitt, Florida Department of Environmental Protection (FDEP), accompanied by Ann Hopkins, Environmental Enterprises of Florida, Inc. (EEFI), inspected the facility for compliance with State and Federal hazardous waste transporter and transfer facility regulations. EEFI is located at 314-B West Landstreet Road, Orlando, Orange County, Florida. EEFI has operated from this location for approximately 6 years.

EEFI leases approximately 2 acres of land, operates 8 trucks and employs about 8 people. The EPA Identification number for this location was issued to EEFI on July 25, 1995.

10. INSPECTION HISTORY:

At this location, EEFI was last inspected on September 8, 2000, by John White, FDEP, and was in compliance at that time.

At this location, EEFI was inspected on August 17, 1995, by William Kappler, FDEP, and was in compliance at that time.

11. PROCESS DESCRIPTION:

EEFI uses 8 trucks (tractor trailers) to pick up hazardous and nonhazardous wastes from generators and other transporters. The waste is transported to EEFI's facility and stored on-site, in the trailer, for no more than 10 days. Because the waste is not unloaded from the trailers and is stored in accordance with DOT requirements, EEFI is not subject to the aisle space requirements listed in Florida Administrative Code Rule 62-730.171(2)(a).

Each trailer can store a maximum of 90 55-gallon drums. The outdoor storage area for trailers is about 50 feet long and is constructed with a 6-inch thick concrete slab. A 6-inch high asphalt curb surrounds the pad.

A storage trailer has been constructed for storage of DEA controlled substances. The trailer sits on a man made surface and is surrounded by a chainlink fence with barbwire.

Prior to picking up waste, generators submit a waste profile to EEFI. EEFI submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, EEFI then provides the generator with a description of the waste and an acceptance letter. EEFI then schedules a date and time for transport. For hazardous wastes, EEFI dispatches a driver with orders describing the waste type and amount.

12. INSPECTION:

EEFI was inspected as a hazardous waste transporter and transfer facility. As such, EEFI is subject to regulation under F.A.C. 62-730 sections 170 and 171. Requirements for transporters include notification, which EEFI has done and, in accordance with F.A.C. 62-730.170(2)(a) - The transporter shall have and maintain financial responsibility for sudden accidental occurrences in a minimum amount of \$1,000,000 per occurrence for combined coverage of injury to persons and for damage to property and the environment from the spillage of hazardous waste while such wastes are

being transported including the costs of cleaning up the spill. EEFI has provided proof that the company has insurance and that their insurance is up to date.

As a hazardous waste transfer facility, EEFI must meet the requirements outlined in 62-730.171(2). These requirements include, but are not limited to, development of a contingency plan, management of containers in accordance with 40 CFR Part 265 Subpart I, and developing a written closure plan to show that the facility will be closed in a manner which satisfies the requirements of the closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112, 265.114 and 265.115. All of these records are maintained by EEFI.

EEFI is also required to maintain a written record of when all hazardous waste enters and leaves the facility. EEFI does this through the use of color-coded labels and combining manifests that are destined for the same disposal facility. When wastes arrive at the facility, the manifests are grouped by which disposal facility will receive the waste. The waste is shipped off before the facility reaches the 10 day storage limit.

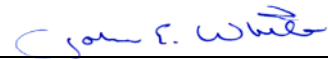
Training records, weekly inspection logs, and manifests were also reviewed and no violations were noted.

A trailer on-site was storing hazardous waste containers. The trailer was approximately two-thirds full of hazardous waste containers. No violations were noted.

Approximately 120 non-hazardous solid waste containers were found accumulating on a concrete pad. One drum had a non-hazardous waste label identifying the contents as "Rags with Oil" placed over a hazardous waste label, dated 9-1-99. The indications are that the drum has probably been reused. Solid waste is consolidated into a roll-off container and shipped to a Subtitle D solid waste landfill.

13. CONCLUSION:

EEFI was inspected as a hazardous waste transporter and hazardous waste transfer facility and was in compliance at the time of this inspection.

Report Prepared By: 
John White
Environmental Specialist

jw