**From:** Wiedemann, Lisa
**To:** Perry, Jenna D.;
**Subject:** Jacksonville TRANSFLO Terminal
**Date:** Thursday, July 29, 2010 2:33:50 PM
**Attachments:** Jacksonville - DEP Non-Compliance Response_2010-07-29.pdf

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Hi Jenna,

Please find attached our written response to the Hazardous Waste Program inspection (NCL10-2572HW16NED).

Please let me know if you have any questions or concerns.

Regards,

Lisa Wiedemann
Manager - Health, Safety, Environmental & Quality
TRANSFLO Terminal Services, Inc.
(904) 279-6337 (office)
(904) 245-2228 (fax)
lwiedemann@transflo.net

**July 29, 2010**

**Ms. Jenna Perry**
**Florida Department of Environmental Protection**
**Northeast District Office**
**7825 Baymeadows Way, Suite 200B**
**Jacksonville, FL 32256-7590**

**RE: Non-Compliance Letter No.: NCL10-2572HW16NED**
**Jacksonville TRANSFLO Terminal – EPA/DEP ID: FLD 984 253 526**

Dear Sirs:

Enclosed please find our written response to the Non-Compliance Letter regarding the Hazardous Waste Program Compliance program inspection performed on Friday, April 30, 2010. Also enclosed is the documentation for the cleanup of the secondary containment spill pallet to show that we have complied with the request made in the Hazardous Waste Inspection Report. The Used Oil railcars were labeled immediately after the Inspection. However, currently the terminal does not have Used Oil railcars in storage. Upon arrival, for all unlabeled, Used Oil railcars will be labeled in accordance with Rule 40 CFR 279.45(g).

If you have any questions or concerns, please contact me at (904) 279-6337 or via email at lwiedemann@transflo.net or Jan Barnes at (904) 279-6323 or via email at jbarnes@transflo.net.

Sincerely,

Lisa M. Wiedemann
Manager – HSE & Quality


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**Jacksonville TRANSFLO Terminal**
**HAZARDOUS WASTE PROGRAM COMPLIANCE INSPECTION**
**Assessment Date: April 30, 2010**

## Background

On Friday April, 30, 2010, the Florida Department of Environmental Protection (FLDEP) personnel conducted an inspection of the Jacksonville TRANSFLO Terminal, located in Jacksonville, FL. The walk through audit was conducted by Jenna Perry, Environmental Specialist III with the FLDEP. Terminal records or other documentation were reviewed during this inspection along with a site inspection. The inspection was intended to assure compliance with the state of Florida's hazardous waste program. This report offers the response of the findings of the inspection.

## Identified Area of Concern:

***Finding:*** *A small amount of used oil was in the secondary containment spill pallet in the Shop Area. This release should be cleaned up and the resultant wastes managed properly. Alternatively, the facility may have the spill pallet pumped out by its used oil hauler.*

**TRANSFLO Response:** TRANSFLO cleaned up the small amount of used oil in the secondary containment spill pallet on May 4, 2010. The used oil hauler pumped out the spill pallet along with the used oil contained in the drum on the spill pallet. A copy of the Service Order from the collection is attached.

## Identified New Potential Violation:

***Finding:*** *According to Rule 40 CFR 279.45(g), the facility failed to label the used oil railcar in storage at the facility.*

***Recommended Corrective Action:*** *In order to return to compliance, the facility should label all used oil containers, tanks, and railcars with the words "Used Oil." The railcars should be labeled while in storage at TRANSFLO.*

**TRANSFLO Response:** TRANSFLO immediately placed labels with the words "Used Oil" on all railcars containing Used Oil while in storage at the Terminal. The terminal does not currently have railcars containing Used Oil in storage. The terminal will ensure that unlabeled railcars will be labeled with the words "Used Oil" upon arrival at the terminal.


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FCC environmental

523 N. Sam Houston Parkway East, Suite 400 Houston, TX 77060

SPECIAL NOTES

# SERVICE ORDER

NUMBER

PAGE OF

CALL TYPE | PROBLEM CODE | ORDER ORIGIN

PRIORITY

CUSTOMER CONTACT

PHONE NUMBER

SITE NUMBER NAME AND ADDRESS

Transflo
116 Druid St.
Jacksonville Fl.

CALL WAS TAKEN ON AT BY

PO NUMBER

ROUTE

ASSIGNED TECH 581003

PROBLEM SYNOPSIS, AS REPORTED

used oil

M/A NUMBER

PROMISE DATE, TIME

| VEHICLE NO. | TRAILER NO. | UPTIME UNIT NO | TT | TM | ST | ARRIVE DATE | ARRIVE TIME | CLOSE DATE | CLOSE TIME | JOB COMPLETE |
|---|---|---|---|---|---|---|---|---|---|---|
| 589252 | NA | 581003 | .2 | 8 | .2 | 5-4-10 | 0648 | 5-4-10 | 0700 | YES / NO |

| PART / DESCRIPTION | U/M | QUANTITY | HM | SHIPPING DESCRIPTION | SERIAL # / GLYCOL | pH | # CONT / BHIX | SNIFFER | TYPE / C-D-T |
|---|---|---|---|---|---|---|---|---|---|
| CGL UOAGA used oil Auto GA | GA | 55 | | NON DOT regulated used oil | | | | | ✓ |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
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***Reuse Qualification Statement***

By signing this document, I hereby certify that I understand that used Hydrocarbon Recovery Services, Inc. degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to Hydrocarbon Recovery Services, Inc. for inclusion in the Hydrocarbon Recovery Services, Inc. Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program. I further certify that any used degreasing fluid so returned to Hydrocarbon Recovery Services, Inc. has not been mixed with hazardous waste or other objectionable substances.

All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willingly make this true, accurate and complete certification.

***Reuse Solvent QA & QC***

| Yes | No | | Yes | No | |
|---|---|---|---|---|---|
| ☐ | ☐ | Used solvent passed visual inspection | ☐ | ☐ | Light assembly is in good working order |
| ☐ | ☐ | Used solvent has no unusual odor | ☐ | ☐ | Lid is unobstructed |
| ☐ | ☐ | Parts Cleaner is clean (front/back) | ☐ | ☐ | Parts Cleaner is properly grounded |
| ☐ | ☐ | Fusible link operational | | | |

Rep Initials _____

***Authorization Signature***

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

ERAN A. OHANT — Eran A. Ohant

PRINT CUSTOMER NAME — CUSTOMER SIGNATURE / DATE

_____ Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5

_____ Initial if Do-it-yourself collection center

Generator SPA ID# _____

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by Hydrocarbon Recovery Services, Inc. does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

**Shipping Declaration:**

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

**Transporter Information:**

Hydrocarbon Recovery Services Inc.
523 N. Sam Houston Parkway East, Suite 400
Houston, TX 77060
US DOT ID#: 1608821
EPA ID#: TXR000078094
EMERGENCY CONTACT CHEMTREC (800) 424-9300

**Designated Facility**

2008 East 21st Street
Jacksonville, FL 32206
(800) 235-0189, Ext 7
EPA ID#: FLR000031393

5-4-10

DRIVER SIGNATURE / DATE — RECEIVED AT PLANT / DATE

LF 070 Rev A

024423

CUSTOMER

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