



Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 31, 2011

SENT VIA EMAIL
mistjs@bellsouth.net

Mr. Tom Sween, President
Marine Industrial Services Inc
709 Talleyrand Ave
Jacksonville, Florida 32202

Re: Marine Industrial Services Inc
EPA/DEP ID: FLD 032 383 945
Duval County - Hazardous Waste

Dear Mr. Sween:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on April 12, 2011. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning used oil management. Subsequent to the inspection, your facility submitted information stating that the violations have been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.256.1674.

Sincerely,

Jenna Perry
Environmental Specialist III
Hazardous Waste Section

 Enclosure(s)



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Marine Industrial Services Inc

On-Site Inspection Start Date: 04/12/2011

On-Site Inspection End Date: 04/12/2011

ME ID#: 52185

EPA ID#: FLD032383945

Facility Street Address: 709 Talleyrand Ave, Jacksonville, Florida 32202-1042

Contact Mailing Address: PO Box 43175, Jacksonville, Florida 32203-3175

County Name: Duval

Contact Phone: (904) 350-0006

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jenna Perry, Inspector

Other Participants: Tom Sween, President

LATITUDE / LONGITUDE: Lat 30° 19' 44.6989" / Long 81° 37' 50.2162"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

Marine Industrial Services Inc (MIS) was inspected on April 12, 2011, as an unannounced hazardous waste compliance evaluation inspection. MIS was last inspected on March 31, 2005, when it was in operation as a used oil transporter/transfer facility, a used oil filter transporter/transfer facility, and a petroleum contact water (PCW) transporter. MIS is currently operating as a used oil, used oil filter, and PCW transporter.

MIS offers the following services: industrial tank cleaning, wastewater management, vacuum truck services, and hydro-blasting. The facility consists of offices and a maintenance shop. MIS has four vacuum trucks, one tractor tanker, one box truck, and one flat bed truck. General maintenance of fleet vehicles is performed on-site. Mr. Tom Sween, President, was present throughout the inspection.

Process Description:

Used Oil Transportation

Industrial tank cleaning involves hosing down empty tanks with soap and water, and the oily wastewater or PCW is taken to Liquid Environmental Solutions (LES) for disposal. According to Mr. Sween, sometimes it is necessary to pump out used oil from a tank prior to cleaning. This used oil is then brought directly to LES. If LES is not open, the tanker will be brought back to MIS until LES re-opens.

According to Mr. Sween, the majority of used oil filters transported by MIS are off-loaded from boats. These filters are also taken to LES.

Inspection Date: 04/12/2011

Maintenance Shop

General automotive maintenance is performed in this area, including oil and oil filter changes. According to Mr. Sween, waste rags and absorbents are taken to LES for disposal, and waste batteries are disposed of through Napa.

There is one parts washer in this area, which uses diesel fuel as solvent. Waste diesel from this machine is placed into the facility's used oil.

There was one 5-gallon bucket and one drain pan that had a very small amount of used oil in the containers. These two containers were not properly labeled (Photo 1). [This is an area of concern](#). The facility is reminded that all used oil containers, including drip pans, buckets, and other transfer containers, should be labeled with the words "Used Oil."

Record Review

Used oil, used oil filter, and PCW transportation records since September of 2010 were reviewed during the inspection. In that time frame, MIS has transported used oil seven times, for a total of over 600 gallons. The facility did not record the results of the halogen screening test on any of the seven used oil transportation records [[40 CFR 279.44\(d\)](#)]. Mr. Sween stated that a halogen sniffer is used for each used oil pick-up, but that the results had not been recorded.

The facility uses DEP Form 62-710.901(2) to log its waste shipments, including used oil. The facility did not mark the type code or end use code on either the log or the transportation records for the seven used oil shipments [[Rule 62-710.510\(d\) and \(f\)](#), [FAC](#)].

On one PCW record from 12/16/10 (#16142), the address for the receiving facility, LES, was not included. [This is an area of concern](#).

The facility's used oil training program appeared to be in order, and the required insurance was up to date. The used oil and used oil filter transportation registration from the DEP was on display at the facility as required. MIS submits its annual report by March 1 as required.

MIS is currently operating as a used oil, used oil filter, and PCW transporter. The facility has been assigned the EPA ID number FLD032383945. Please use this number on all transportation records and on all correspondence with the DEP.

Areas of Concern:

1. There was one 5-gallon bucket and one drain pan that had a very small amount of used oil in the containers. These two containers were not properly labeled. All used oil containers, including drip pans, buckets, and other transfer containers, should be labeled with the words "Used Oil."
2. On one PCW record from 12/16/10 (#16142), the address for the receiving facility, LES, was not included. PCW transportation records should include the name and location of the person shipping the PCW, the date the PCW was picked up, the volume of the PCW transported, the name and location of the person receiving the PCW, and the delivery date of the PCW.

New Potential Violations:

CFR = Code of Federal Regulations; FAC = Florida Administrative Code

Type: Violation 1

Inspection Date: 04/12/2011

Rule: 40 CFR 279.44(d)

Explanation: The facility failed to mark the results of the halogen screening tests on its used oil acceptance records.

Corrective Action: No further action is required. The facility returned to compliance on 4/27/11.

Type: Violation 2

Rule: Rule 62-710.510(1)(d), FAC and Rule 62-710.510(1)(f), FAC

Explanation: The facility failed to mark the type code and end use code of its used oil shipments on either the transportation record or on DEP Form 62-710.901(2).

Corrective Action: No further action is required. The facility returned to compliance on 4/27/11.

Summary of Potential Violations:Potential Violations

Rule Number	Area	Date Cited	Explanation
279.44(d)		04/12/2011	The facility failed to mark the results of the halogen screening tests on its used oil acceptance records.
62-710.510(1)(d), 62-710.510(1)(f)		04/12/2011	The facility failed to mark the type code and end use code of its used oil shipments on either the transportation record or on DEP Form 62-710.901(2).

Photo 1



Inspection Date: 04/12/2011

Signed:

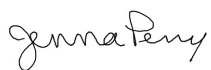
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jenna Perry

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

5/31/2011

DATE

Tom Sween

REPRESENTATIVE NAME

President

REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED

REPRESENTATIVE SIGNATURE

Marine Industrial Services

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.