



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

FACILITY INFORMATION:

Facility Name: McKenzie Tank Lines Inc

On-Site Inspection Start Date: 08/29/2011

On-Site Inspection End Date: 08/29/2011

ME ID#: 7388

EPA ID#: FL0000347815

Facility Street Address: 535 Port Leon Drive, Saint Marks, Florida 32355

Contact Mailing Address: PO Box 155, Saint Marks, Florida 32355-0155

County Name: Wakulla

Contact Phone: (850) 925-6309

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil facility

INSPECTION PARTICIPANTS:

Principal Inspector: Caroline A. Horton, Inspector

Other Participants: Aaron Mitchell, Inspector; Mark Leonard Arnold, Terminal Manager

LATITUDE / LONGITUDE: Lat 30° 10' 8.1445" / Long 84° 12' 25.994"

SIC CODE: 4231 - Trans. & utilities - trucking terminal facilities

TYPE OF OWNERSHIP: Private

Introduction:

McKenzie Tank Lines (MTL) is located in St. Marks, Florida. This location serves as a fueling station, maintenance facility, and wash area for MTL fleet trucks.

MTL generates used oil, used oil filters, used batteries, rags, and spent mercury containing lamps. Used oil, used oil filters, and parts washer fluid are transported by Safety Kleen. Rags are laundered by UniFirst. Used batteries are taken to Kyle Recycling in Hosford, FL. Spent mercury containing lamps are transferred to the MTL location (ME ID#: 16716) at 2778 W Tharpe St, Tallahassee, Florida 32303 for recycling.

Process Description:

This facility consists of four work bays, one washing facility and a large parking/storage area. Located behind this facility were two 12,000 gallon diesel tanks that are utilized for MTL's refueling purposes. These tanks are located in secondary containment.

MTL performs routine preventative maintenance on its fleet of trucks. This four bay repair facility is surrounded by asphalt parking lot and washing facility. One "BlackGold" heater/furnace is hard piped to a 205 gallon labeled used oil tank that burns the used oil generated at the facility. The used oil tank and heater are located within the maintenance facility. A box of spent mercury containing lamps was being stored within the maintenance facility, however it was not closed, or properly labeled. Labels were provided, and the box of spent mercury containing lamps was properly closed and labeled prior to the conclusion of the inspection.

The wash rack is used to wash the exterior of McKenzie trucks/trailers before maintenance work is performed. The drains are designed to flow to a collection sump and oil water separator. According to Mr. Arnold the sump/oil water separator is serviced by skimming the oil off the top of the water, then the water is collected in an onsite 5800-gallon treatment tank. The pH is adjusted to neutral and sent to the local water treatment facility. According to Mr. Arnold the used oil and sludges are

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collected and sent for disposal by Water Recovery LLC out of Jacksonville.

Also located in this area were several 55-gallon drums of labeled used oil and used oil filters. Four 55-gallon drums of used oil, and four 55-gallon drums of used oil filters were labeled, closed, and within the covered wash area that served as secondary containment. A 55-gallon drum of waste black liquor from a local wood chip cooking process that was drained from a fleet vehicle was also stored in this area.

New Potential Violations and Areas of Concern:**Universal Waste Lamps**

Type: Violation

Rule: 273.13(d)(1)

Question Number: 39.10

Question: Are lamps managed in a manner to prevent breakage or the release of universal waste or components of universal waste and are the packages or containers structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps?

Explanation: The container of spent mercury containing lamps found on site was not properly closed.

Corrective Action: The container of spent mercury containing lamps was properly closed prior to the conclusion of the inspection.

Type: Violation

Rule: 62-737.400(5)(b)

Question Number: 39.40

Question: Is each lamp or container labeled or marked clearly with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps"?

Explanation: The container of spent mercury containing lamps found on site were not labeled.

Corrective Action: Universal waste lamps, devices or the containers in which they are stored shall be labeled or marked clearly as follows: with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps".
The container of spent mercury containing lamps found on site was labeled and dated to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste prior to the conclusion of the inspection.

Summary of Potential Violations and Areas of Concern:Potential Violations

| Rule Number | Area | Date Cited | Explanation |
|---------------------------------------|------|------------|--|
| Universal Waste Lamps 273.13(d)(1) | | 08/29/2011 | The container of spent mercury containing lamps found on site was not properly closed. |
| 62-737.400(5)(b) | | 08/29/2011 | The container of spent mercury containing lamps found on site were not |

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| Rule Number | Area | Date Cited | Explanation labeled. |
|-------------|------|------------|----------------------|
|-------------|------|------------|----------------------|

Areas of Concern

No Areas of Concern

ATTACHMENTS:

Used Oil & Used Oil Filter Drums



Wastewater tank



Used oil tank



Used oil Blackgold burner



Labeled Spent Mercury Lamps



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Conclusion:

The facility appeared to be in compliance at the conclusion of the inspection.

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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. 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.

Caroline A. Horton

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

9/6/2011

DATE

Aaron Mitchell

INSPECTOR NAME

Inspector

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Mark Leonard Arnold

REPRESENTATIVE NAME

Terminal Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

McKenzie Tank Lines, Inc.

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.