



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

FACILITY INFORMATION:

Facility Name: Liquid Environmental Solutions of Florida LLC
On-Site Inspection Start Date: 07/19/2011 **On-Site Inspection End Date:** 07/19/2011
ME ID#: 33798 **EPA ID#:** FLD981928484
Facility Street Address: 1640 Talleyrand Ave, Jacksonville, Florida 32206-5436
Contact Mailing Address: 1640 Talleyrand Ave, Jacksonville, Florida 32206-5485
County Name: Duval **Contact Phone:** (904) 265-2101

NOTIFIED AS:

CESQG (<100 kg/month)
Used Oil

INSPECTION TYPE:

Compliance Assistance Site Visit Inspection for CESQG (<100 kg/month) facility
Compliance Assistance Site Visit Inspection for TSD Facility Unit Type(s)
Compliance Assistance Site Visit Inspection for Used Oil Processor facility
Compliance Assistance Site Visit Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jenna Perry, Inspector
Other Participants: 7/19/11 - Keith Adams, Process Supervisor; 8/10/11 - Yuri Turovsky, General Manager

LATITUDE / LONGITUDE: Lat 30° 20' 36.3664" / Long 81° 37' 44.8878"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

Liquid Environmental Solutions of Florida LLC (LES) was inspected on July 19, 2011, as an unannounced hazardous waste compliance evaluation inspection. A follow-up visit was conducted on August 10, 2011. LES is an industrial wastewater pre-treatment facility, a used oil processor (Permit # 72815-HO-009), a used oil transporter, and a Petroleum Contact Water (PCW) recovery facility. The facility was previously known as Industrial Water Services (IWS), and the permit transfer to LES was completed on May 21, 2010. In the Application for Transfer of Permit dated December 23, 2009, Mr. Patrick Reilly, LES Senior Vice President, acknowledged that he was familiar with the permit and agreed to comply with its terms and conditions. The facility was most recently inspected on June 3, 2008, when IWS was still in operation.

The facility consists of a main office, a laboratory, a maintenance shop, a container storage area, the processing/treatment/recovery areas, and a solids/sludge/residues management area. Mr. Keith Adams, Process Supervisor, was present for the July 19 inspection, and Mr. Yuri Turovsky, Plant Manager, was present for the August 10 visit. Mr. Turovsky was employed by IWS and participated in previous inspections.

Process Description:

The facility treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. Incoming wastewater is treated by gravity separation and/or by dissolved air flotation (DAF). It is then chemically treated to adjust the pH in order to induce coagulation and flocculation. Treated wastewater is discharged to the local POTW (JEA-Buckman

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Wastewater Plant). Stormwater is collected in a sump on the southeast corner of the facility. The stormwater is typically sent through an oil/water separator to tank 6, then to the DAF unit on-site. At the time of the inspection, the oil/water separator was undergoing repairs, so the facility was routing all stormwater directly to tank 6.

According to Mr. Turovsky, roughly 10% of all incoming shipments are used oil. These shipments of used oil are sampled for TOH and flashpoint. After passing the analyses, the used oil is off-loaded into tanks 51 and 52. The used oil is then treated by gravity separation and/or by dissolved air flotation. After treatment, the oil is directed to tanks 24-27 to cool down and then, if no other processing is necessary, the oil is directed to tanks 54-56 for shipment off-site. The wastewater fraction receives further treatment and processing, and it is then discharged to the POTW. All of the facility's used oil processing tanks were properly labeled; however, seven containers of used oil in the area were not labeled with the words "Used Oil" (Photos 1-7) [40 CFR 279.54(f)(1)]. There were several releases of what appeared to be used oil on the concrete in the secondary containment. Mr. Turovsky stated that the containment is cleaned once per day.

Samples are also taken of incoming shipments of oily wastewater. According to Mr. Turovsky, TOH is run on all shipments of oily wastewater that have a definable amount of used oil. After passing the analysis, oily wastewater is off-loaded into tanks 1 and 2 for gravity separation. The free oil is then transferred to the oil processing tanks for further treatment.

PCW is sampled and tested for flashpoint, and after passing the analysis, the PCW is off-loaded into tanks 81 and 82. The PCW is treated via gravity separation, and the recovered product volume is measured for reporting purposes. The fuel is then transferred to the oil processing tanks. At the time of the inspection, both PCW tanks were properly labeled.

The solids/sludges/residues generated from the facility's activities are de-watered, loaded into roll-off containers, and then disposed at Camden County Landfill. LES generates 10 to 15 roll-offs of the solids/sludges/residues per month; however, according to Mr. Turovsky, the facility cleans out the used oil processing tanks once per year, which generates between 100 to 200 gallons of oily sludge per tank cleaned. The tank cleanout sludge is then placed into a roll-off with the other solids/sludges/residues generated at the facility. LES performs one analytical test per quarter on a random roll-off containing the solids/sludges/residues. The last analytical performed was in early July 2011, and the results showed the waste to be non-hazardous. The facility's permit states that the facility must analyze outgoing solids/sludges/residues generated from the storage and processing of used oil at least twice per quarter [Section 403.161(1)(b), FS, and Permit - Part II - Condition 6].

The facility is a registered used oil filter processor; however, the facility does not process the used oil filters it receives. According to Mr. Turovsky, LES does not receive many filters, and only one to two disposals are necessary per year. The filters come in drums, and any free oil inside the drum is pumped out and processed. The drums are then placed into a separate storage area until they can be picked up for disposal at EcoFlo Southeast in Georgia. At the time of the inspection, the facility had four drums of used oil filters on-site. The drums were closed and on an oil-impermeable surface; however, three of the drums were not properly labeled with the words "Used Oil Filters" (Photo 8) [Rule 62-710.850(5)(a), FAC].

In the laboratory, the facility generates small amounts of waste laboratory solvents from Chlor-d-test and Chemical Oxygen Demand (C.O.D.) analysis procedures. LES has characterized the Chlor-d-test test waste as a D001/D006 hazardous waste. According to a MSDS for the Chlor-d-test test, the kit contains ethanol, mercuric nitrate in water, and sulfuric acid in water containing <0.05% Cadmium, and ampules one and four have flashpoints of 138° F and 48° F, respectively. The MSDS also states that this waste will pass a TCLP test. LES may want to re-evaluate its hazardous waste determination on the Chlor-d-test waste to determine if it can be handled as non-hazardous waste. The C.O.D. test generates a D002/D007/D009 waste solvent. These two waste streams are collected in separate satellite containers located outside the laboratory. Both drums contained approximately 15 gallons and were dated 1/14/10. When needed, the hazardous wastes generated from laboratory operations are manifested for disposal to a properly permitted TSD facility. The most recent shipment of hazardous waste was sent to EQ of Florida (FLD961932494) on 12/17/09.

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The maintenance shop is used for repairing items such as pumps and valves. No hazardous waste is generated in this area and, according to both Mr. Adams and Mr. Turovsky, no used oil is generated here either.

The container storage area is used for non-hazardous waste brought into the facility. Used oil drums are also brought to this area for storage until they can be pumped into the processing tanks. At the time of the inspection, there was one drum of used oil in this area that was labeled as a non-hazardous waste with a work order number and a date (Photo 9). The drum was not properly labeled "Used Oil" [40 CFR 279.54(f)(1)].

In an adjacent area was an open drum containing spent fluorescent bulbs (Photo 10) [40 CFR 273.13(d)]. The drum was labeled "Bad Bulbs" and contained approximately 20 bulbs. The facility should store all spent bulbs in an appropriate closed container that is labeled with one of the following phrases: "Universal Waste Lamps(s)," "Waste Lamp(s)," or "Used Lamp(s)."

Transportation Operations

The facility is also a registered and certified used oil transporter. According to Mr. Turovsky, LES mainly accepts shipments from third party carriers; however, occasionally used oil transportation is performed by LES.

Mr. Turovsky stated that when a new customer is serviced by LES, a process description and a sample of the customer's used oil is collected. The sample is analyzed for TOH prior to any pickups, and LES re-tests the used oil on a yearly basis. After the used oil passes the original test, LES does not perform TOH tests on each individual pickup from the customer [40 CFR 279.44(a)], but the TOH tests are run once the load has reached the facility for processing.

Training for used oil transportation personnel includes only a summary of where to find the rules governing used oil management and instructions for handling spills. Training does not include a review of the actual regulations, how to manage the used oil, or a review of halogen screening requirements [Rule 62-710.600(2)(b), FAC].

Acceptance/Delivery Record Review

According to Mr. Turovsky, disposal records are only kept on-site for one month following the date of disposal, then the records are brought to LES's Adams Street office in Jacksonville. Records are kept there for seven years. According to the facility's permit, used oil disposal records should be kept at the permitted facility [Section 403.161(1)(b), FS, and Permit - Part II - Condition 2(d)].

Three used oil acceptance records from 2011 were available for review during the inspection. On 6/3/11, 55 gallons of used oil was received from Crowley Liner Services through Marine Industrial Services. On 6/24/11, 2,151 gallons of used oil was received from a generator in Georgia through Environmental Remediation Services. And on 6/29/11, 55 gallons of used oil was received from a JEA facility. The facility's permit requires that used oil acceptance records contain the following information: the name, address, and EPA ID number (if applicable) of the transporter who delivered the used oil, as well as the generator, the quantity of each type of used oil accepted, the date of acceptance, the waste stream approval number, and the off-load tank number. None of the three acceptance records from June 2011 had the address of the transporter listed on the record [Section 403.161(1)(b), FS, and Permit - Part II - Condition 2(a)].

Five used oil delivery records were available for review at the time of the inspection. Currently, all used oil delivered to other facilities is off-specification. On 7/1/11, LES shipped two loads of 6,500 gallons each to Texpar Energy (GAD033590514). On 7/14/11, LES shipped one load of 6,500 gallons and another load of 1,190 gallons to Texpar Energy. On 7/15/11, LES shipped 6,500 gallons to Oil Recovery, Inc (GAR000054460). And on 7/18/11, LES shipped 6,500 gallons to PetroTech Southeast (FLR000159541) through a transporter identified only as "Parker" on the

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record (Photo 11). The 7/18/11 record did not list an address or EPA ID number for "Parker" [40 CFR 279.56(b); Section 403.161(1)(b), FS; and Permit - Part II - Condition 2(b)]. LES is reminded that it should offer used oil for transportation only to a currently registered used oil transporter.

Section 62-710.510, FAC, requires that all registered facilities, including used oil processors, maintain records that include the type code designation and the end use code designation of used oil handled by the facility. These two codes were not found on the facility's delivery records [Rule 62-710.510(d) and (f), FAC].

Eight PCW acceptance records were reviewed during the inspection. During July 2011, LES accepted 2,600 gallons of PCW from various sources. According to the facility's permit, each PCW acceptance record should contain the following information: the name and address of the producer and the transporter, the date of shipment, the volume, and assurances from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW. None of the eight records reviewed listed the address of the transporter, one record from 7/7/11 did not list the name of the transporter, and one record from 7/14/11 did not list the address of the producer [Rule 62-740.300(2)(c), FAC; Section 403.161(1)(b), FS; and Permit - Part III - Condition 7]. LES is submitting its annual report describing the amount of product recovered at the facility as required.

Other Record Review

LES did not have a paper copy of the current used oil processing permit on-site. The only copy the facility had was an electronic version [Section 403.161(1)(b), FS, and Permit - Part I - Condition 12].

The validated registration form and identification number on display at the facility at the time of the inspection had expired on 6/30/11 [Rule 62-710.500(4); FAC; Section 403.161(1)(b), FS; and Permit - Part I - Condition 19].

The facility was maintaining inspection logs as required and had a complete Contingency Plan dated 6/1/11. The latest version of the Contingency Plan had not been sent to local authorities [40 CFR 279.52(b)(3); Section 403.161(1)(b), FS; and Permit - Part I - Condition 42(b)].

Reports summarizing used oil processing activities are submitted annually as required.

According to Attachment C.10 of the IWS permit application dated 10/17/07, the training program in place at the facility should include a review of the actual state and federal used oil regulations. According to Mr. Turovsky, the training program for the used oil processing personnel includes only a summary of where to find the rules governing used oil management and instructions for handling spills [Section 403.161(1)(b), FS, and Permit Application - Attachment C.10]. Employees should be familiar with the requirements of the applicable regulations.

Mr. Turovsky stated during the 8/10/11 visit that many of the tanks at the facility have a different designated purpose than the last revised tank table submitted by IWS on 4/9/08. LES did not notify the DEP of the change in operational use of each tank. The following tanks appear to have changed operational use since the last tank table was submitted in 2008 (may not be a complete list): used oil tank 101 (now solids), oily water tanks 91 and 92 (now solids), sludge/oily water tank 70 (now solids), and sludge tanks 89 and 90 (now flexible use). The facility did not perform closure on the tanks in accordance with Attachment C.9 of the facility's application dated 10/17/07 [Rule 62-710.800(5), FAC; Section 403.161(1)(b), FS; and Permit - Part V - Condition 1].

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The following is a list of areas of concern discovered during the visit to the facility. The facility should send a written response to the DEP outlining the corrective actions that were taken to bring the facility into compliance for each of the following areas of concern. For each item, please provide information in the form of receipts, manifests, photos, and/or new written procedures to document the facility's return to compliance. Please submit this response within 30 days of receipt of this inspection report to:

Jabe.Breland@dep.state.fl.us

or

Jabe Breland

Florida Department of Environmental Protection

7825 Baymeadows Way, Suite B-200

Jacksonville, Florida 32256

New Potential Violations and Areas of Concern:**Checklist Independent Potential Violations and Areas of Concern**

Type: Area Of Concern

Rule: 279.54(f)(1)

Explanation: The facility did not properly label one 55-gallon drum of used oil and at least seven used oil drain buckets.

Corrective Action: In order to return to compliance, the facility should label all used oil tanks and containers with the words "Used Oil."

Type: Area Of Concern

Rule: 279.44(a)

Explanation: The facility had not performed a halogen screening on each load of used oil prior to accepting the used oil for transportation.

Corrective Action: In order to return to compliance, the facility should verify that the total halogen content of all future shipments of used oil is less than 1,000 ppm by testing the used oil prior to shipment.

Type: Area Of Concern

Rule: 62-710.500(4), 403.161(1)(b)

Explanation: Permit Condition - Part I, Condition 19

The validated registration form and ID number on display at the facility had expired prior to the inspection on 6/30/11.

Corrective Action: In order to return to compliance, the facility should post the current registration form and identification number provided by the Department in a prominent place at its facility.

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| | |
|--------------------|---|
| Type: | Area Of Concern |
| Rule: | 403.161(1)(b) |
| Explanation: | Permit Condition - Part II, Condition 6 |
| Corrective Action: | <p>The facility did not analyze residues generated from the storage and processing of used oil at least twice per quarter.</p> <p>In order to return to compliance, the facility should begin testing any used oil related residues generated at the facility at least twice per quarter. A hazardous waste determination should be performed on the residues in accordance with 40 CFR 279.10(e) and pursuant to Attachment C.5 of the facility's permit application dated 10/17/07.</p> |

| | |
|--------------------|---|
| Type: | Area Of Concern |
| Rule: | 403.161(1)(b) |
| Explanation: | Permit Condition - Part II, Condition 2(a) |
| Corrective Action: | <p>The facility's used oil acceptance records did not include the address of the transporter who delivered the used oil to the facility.</p> <p>In order to return to compliance, the facility should ensure that its used oil acceptance records include all of the following information: the name, address, and EPA ID number (if applicable) of the transporter who delivered the used oil and of the used oil generator, the quantity of each type of used oil accepted, the date of acceptance, the waste stream approval number, and the off-load tank number.</p> |

| | |
|--------------------|---|
| Type: | Area Of Concern |
| Rule: | 403.161(1)(b), 279.52(b)(3) |
| Explanation: | Permit Condition - Part I, Condition 42(b) |
| Corrective Action: | <p>The facility did not submit the latest revised version of its Contingency Plan to the local authorities.</p> <p>In order to return to compliance, the facility should submit copies of the latest Contingency Plan to local police and fire departments, hospitals, and the state emergency response team.</p> |

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|--------------------|--|
| Type: | Area Of Concern |
| Rule: | 279.56(b), 62-710.510(1)(d), 62-710.510(1)(f), 403.161(1)(b) |
| Explanation: | Permit Condition - Part II, Specific Condition 2(b) |
| Corrective Action: | <p>On a used oil delivery record dated 7/18/11, the address and EPA ID number of the transporter, Parker, were not listed on the record.</p> <p>The type code designation and end use code designation for used oil were not listed on the facility's used oil disposal records.</p> |

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Corrective Action: In order to return to compliance, the facility should:

1. Submit a copy of the record dated 7/18/11, with an attachment listing Parker's full company name, address, and EPA ID number.
2. Begin recording the type code designation and the end use code designation on the facility's used oil disposal records.

Type: Area Of Concern

Rule: 62-710.850(5)(a)

Explanation: LES did not properly label three used oil filter drums.

Corrective Action: In order to return to compliance, the facility should label these containers with the words "Used Oil Filters."

Type: Area Of Concern

Rule: 62-740.300(2)(c), 403.161(1)(b)

Explanation: Permit Condition - Part III, Condition 7

None of the facility's petroleum contact water (PCW) acceptance records included the address of the PCW transporter. In addition, the name of the PCW transporter was missing from a 7/7/11 record, and the address of the PCW producer was missing from a 7/14/11 record.

Corrective Action: In order to return to compliance, the facility should ensure that the following information is included on all PCW acceptance records: the name and address of the producer and transporter, the date of shipment, the volume of PCW, and assurances from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW.

Type: Area Of Concern

Rule: 62-710.800(5), 403.161(1)(b)

Explanation: Permit Condition - Part V, Condition 1

The facility did not notify the DEP of changes in the operational use of each tank. In addition, the facility did not perform closure on tanks taken out of used oil processing.

Corrective Action: In order to return to compliance, LES should submit an updated tank table that lists the current operational use for all tanks located at the facility. The facility should also submit a report showing how tanks no longer used for used oil storage/processing were closed in accordance with the approved closure plan or submit a plan to close the tanks in accordance with the approved closure plan.

Type: Area Of Concern

Rule: 403.161(1)(b)

Explanation: Permit Condition - Part II, Condition 2(d)

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The facility keeps its used oil acceptance and delivery records at its Adams Street office instead of at the permitted facility.

Corrective Action: In order to return to compliance, the facility should keep its used oil acceptance and delivery records at the permitted facility and available for inspection. These records should be maintained for at least three years.

Type: Area Of Concern

Rule: 273.13(d)

Explanation: The facility did not keep spent fluorescent bulbs in a properly labeled, closed container.

Corrective Action: In order to return to compliance, the facility should contain spent fluorescent lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Type: Area Of Concern

Rule: 62-710.600(2)(b)

Explanation: The facility's training program did not cover all areas required for used oil transporters.

Corrective Action: In order to return to compliance, the facility should conduct training for used oil transportation personnel that includes instruction on compliance with state and federal rules governing used oil, proper used oil management practices, including appropriate response actions to any release or spill, a detailed description of the standard operating procedure for halogen screening at each pick up location (this description shall include instrument specifications and capabilities, calibration methods and frequency, procedures addressing the handling of loads which indicate halogen levels in excess of 1,000 ppm, and record keeping procedures for all loads accepted or refused).

The facility should provide each new employee with an introduction to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle. All new employees must complete the entire training program within 90 days of hire. The facility should maintain a record of this training in its operating record and individual personnel files indicating the type of training received, along with the dated signature of those receiving and providing the training.

Type: Area Of Concern

Rule: 403.161(1)(b)

Explanation: Permit Condition - Part I, Condition 12

The facility did not have a paper copy of the current used oil processing permit on-site. The only copy the facility had was an electronic version.

Corrective Action: The facility should maintain a hard copy of the permit on-site in case of computer error or absence of electricity. Mr. Turovsky printed a copy of the permit during the inspection follow-up on 8/10/11.

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Type: Area Of Concern

Rule: 403.161(1)(b)

Explanation: Permit Application - Attachment C.10

The facility is not training its used oil processing personnel according to Attachment C.10 of the permit application dated 10/17/07.

Corrective Action: LES should begin training its used oil processing personnel to the specifications listed in Attachment C.10 of the permit application. Personnel should be familiar with used oil rules and regulations and proper used oil management. Records of the training should be submitted to the DEP.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

| Rule Number | Area | Date Cited | Explanation |
|--|------|------------|---|
| Checklist Independent Areas of Concern | | | |
| 279.54(f)(1) | | 07/19/2011 | The facility did not properly label one 55-gallon drum of used oil and at least seven used oil drain buckets. |
| 279.44(a) | | 07/19/2011 | The facility had not performed a halogen screening on each load of used oil prior to accepting the used oil for transportation. |
| 62-710.500(4), 403.161(1)(b) | | 07/19/2011 | Permit Condition - Part I, Condition 19 The validated registration form and ID number on display at the facility had expired prior to the inspection on 6/30/11. |
| 403.161(1)(b) | | 07/19/2011 | Permit Condition - Part II, Condition 6 The facility did not analyze residues generated from the storage and processing of used oil at least twice per quarter. |
| 403.161(1)(b) | | 07/19/2011 | Permit Condition - Part II, Condition 2(a) The facility's used oil acceptance records did not include the address of the transporter who delivered the used oil to the facility. |
| 403.161(1)(b), 279.52(b)(3) | | 07/19/2011 | Permit Condition - Part I, Condition 42(b) The facility did not submit the latest revised version of its Contingency Plan to the local authorities. |

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| Rule Number | Area | Date Cited | Explanation |
|--|------|------------|---|
| 279.56(b), 62-710.510(1)(d), 62-710.510(1)(f), 403.161(1)(b) | | 07/19/2011 | <p>Permit Condition - Part II, Specific Condition 2(b)</p> <p>On a used oil delivery record dated 7/18/11, the address and EPA ID number of the transporter, Parker, were not listed on the record.</p> <p>The type code designation and end use code designation for used oil were not listed on the facility's used oil disposal records.</p> |
| 62-710.850(5)(a) | | 07/19/2011 | LES did not properly label three used oil filter drums. |
| 62-740.300(2)(c), 403.161(1)(b) | | 07/19/2011 | <p>Permit Condition - Part III, Condition 7</p> <p>None of the facility's petroleum contact water (PCW) acceptance records included the address of the PCW transporter. In addition, the name of the PCW transporter was missing from a 7/7/11 record, and the address of the PCW producer was missing from a 7/14/11 record.</p> |
| 62-710.800(5), 403.161(1)(b) | | 07/19/2011 | <p>Permit Condition - Part V, Condition 1</p> <p>The facility did not notify the DEP of changes in the operational use of each tank. In addition, the facility did not perform closure on tanks taken out of used oil processing.</p> |
| 403.161(1)(b) | | 07/19/2011 | <p>Permit Condition - Part II, Condition 2(d)</p> <p>The facility keeps its used oil acceptance and delivery records at its Adams Street office instead of at the permitted facility.</p> |
| 273.13(d) | | 07/19/2011 | The facility did not keep spent fluorescent bulbs in a properly labeled, closed container. |
| 62-710.600(2)(b) | | 07/19/2011 | The facility's training program did not cover all areas required for used oil transporters. |
| 403.161(1)(b) | | 07/19/2011 | <p>Permit Condition - Part I, Condition 12</p> <p>The facility did not have a paper copy of the current used oil processing permit on-site. The only copy the facility had was an electronic version.</p> |
| 403.161(1)(b) | | 07/19/2011 | <p>Permit Application - Attachment C.10</p> <p>The facility is not training its used oil processing personnel according to Attachment C.10 of the permit application dated 10/17/07.</p> |

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

ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



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Photo 7



Photo 8



Photo 9



Photo 10



Photo 11

Form No. 100-101
Rev. 1-1-64

7
11

Liquidation Information
1945 National Bureau
of Investigation, U. S. Dept.
of Justice, File No. 100-36844

JAX
07/19/1911

Designed for use by Petitioner or

Address 2830 E. 66 St.

Date 07/19/1911
City SEA
State ILL

File No. 100-36844

Transmit Letter

EPA No.

Address _____

| Citation | HM | US DOT Description |
|----------|-------------------------------------|--|
| MSD | <input checked="" type="checkbox"/> | Various Vol. Liquids, N.E. Local n/l, Comes in 144 PPS To B |

Emergency Contact: Best Contact # 1-800-443-0382
Telex # 1-650-344-330

Reviewed by Smith _____
Emergency Information, No Signature _____
Signature _____

I hereby declare that the contents of this statement are fully and accurately described above by the proper chemical name and classified, packed and labeled, placarded and in all respects in proper
Packaging _____
Transported _____
Placarded _____
Manifested _____

Container Signature: _____

Inspection Date: 07/19/2011

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

NO SIGNATURE

PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

7/19/11 - Keith Adams

REPRESENTATIVE NAME

Process Supervisor

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

LES

ORGANIZATION

8/10/11 - Yuri Turovsky

REPRESENTATIVE NAME

General Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

LES

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.