FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

January 25, 2013

SENT VIA EMAIL
yuri.turovsky@liquidenviro.com

Mr. Yuri Turovsky, General Manager
Liquid Environmental Solutions, LLC
1640 Talleyrand Avenue
Jacksonville, Florida 32206

Re: Liquid Environmental Solutions, LLC
EPA/DEP ID: FLD 981 928 484
Duval County – Hazardous Waste

Dear Mr. Turovsky:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection (Department) at your facility on October 15, 2012. Enclosed is the report that documents this inspection.

Potential violations of Florida Statutes and Rules concerning used oil management were discovered during this inspection. Your facility corrected the potential violations, so the inspection will be closed without enforcement action being taken by the Department.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulations in general, please contact me at 904.256.1671.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section
Enclosure(s)

ec: Paula Whiting, EPA Region IV

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Liquid Environmental Solutions of Florida LLC

On-Site Inspection Start Date: 10/15/2012 **On-Site Inspection End Date:** 10/15/2012

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) 265-2109

NOTIFIED AS:

SQG (100-1000 kg/month)
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

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

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Jabe Breland III, Inspector
Other Participants:	Melissa Padgett, Inspector; Paula Whiting, Environmental Engineer; 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 October 15, 2012, by the Department of Environmental Protection's (Department) Hazardous Waste Section and the Environmental Protection Agency's (EPA) Resource Conservation and Recovery Act (RCRA) Branch. This compliance inspection was unannounced.

LES is an industrial wastewater pre-treatment facility, a used oil processor, a used oil transporter, and a petroleum contact water (PCW) recovery facility. The facility consists of a main office; a laboratory; a maintenance shop; a container storage area; the processing, treatment, and recovery areas; and a solids, sludges, and residues management area.

At the time of the inspection, the facility was operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. The facility has been assigned the EPA ID number FLD981928484. Please use this number on all hazardous waste manifests and on future correspondence with the Department's Hazardous Waste Section. Mr. Yuri Turovsky, General Manager, participated in the inspection. Paula Whiting, Environmental Engineer, with Region IV EPA also participated in the inspection.

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 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.

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 specified used oil tanks. The used oil is then de-watered using gravity, heat, and/or de-emulsifing chemicals. After treatment, the oil is directed to different used oil tanks to cool down and then, if no other processing is necessary, the oil is directed to tanks 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.

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, and discharge to the POTW.

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. 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 two analytical tests per quarter on random roll-offs containing the solids/sludges/residues. The last analytical performed was in early August 2012. Analytical results consitantly show the waste to be non-hazardous.

The facility is a registered used oil filter processor; however, the facility does not process the used oil filters it receives. 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. The drums are kept closed and on an oil-impermeable surface in the drum storage area.

In the laboratory, the facility generates small amounts of waste laboratory solvents from Chlor-d-tect and Chemical Oxygen Demand (C.O.D.) analysis procedures. LES has characterized the Chlor-d-tect test waste as a D001/D006 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. Each drum contained approximately 15 gallons and was dated 1/14/10. When needed, the hazardous wastes generated from laboratory operations are manifested for disposal to a properly permitted TSD facility.

The maintenance shop is used for repairing items such as pumps and valves. No hazardous waste or used oil is generated in this area.

Container Storage Area:
The container storage area is used for non-hazardous waste brought into the facility (Photo 1). Used oil drums are also brought to this area for storage until they can be pumped into the processing tanks. At least five drums of used oil stored in this area did not have a bung to close the container (Photo 2) [Section 62-710.401(6)].

Universal Waste Lamps Closet:
The universal waste lamp closet is located near the lab. One cardboard box containing spent fluorescent bulbs was stored in this area (Photo 3). This container was not closed [40 CFR 273.13(d)(1)] and did not have an accumulation start date [40 CFR 273.15(c)].

Vehicle Staging Area:
The vehicle staging area was enclosed behind a chain link fence and held the LES tanker trucks. Located in this area were four open and empty frac tanks, a 55-gallon drum of diesel used for cleaning out the frac tanks, a metal trash bin for discarded oily personal protective equipment, and a tanker truck with a hose leaking oil on the ground. The tanker truck had two used oil stains underneath it (Photo 4-5) [40 CFR 279.22(d)]. The facility also had three lead acid batteries stored in this area. According to Mr. Turovsky, he was unaware if the batteries were still in use. This is an Area of Concern.

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. Its current used oil registration was on display during the inspection.

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 as part of the waste profile evaluation and approval process. The sample is analyzed for TOH prior to the first pickup, and the profile is re-certified annually. After the used oil passes the original test, LES does not perform TOH tests on each individual pickup from the customer, but the facility requires a statement from the generator before accepting every load for transportation, certifying that its used oil does not contain greater than 1000 ppm halogens.

Acceptance/Delivery Record Review:
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, but are being kept on the computer system and were available for review for any shipment handled by LES.

Used oil acceptance and delivery records were available for review and were in order. PCW records were also reviewed and found to be in order. LES is submitting its annual report describing the amount of product PCW recovered at the facility as required. Reports summarizing used oil processing activities are submitted annually as required.

Other Record Review:
The facility was maintaining inspection logs as required and had a complete Contingency Plan and SPCC Plan. The latest version of the Contingency Plan has been sent to local authorities. Employee training has been updated since the last inspection to include a review of the state and federal used oil regulations and not just a summary of where to find the rules governing used oil management. A copy of the permit and permit application were on-site and available for review.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.13(d)(1)
Explanation:	The facility did not store its universal waste bulbs in a closed and sealed container.
Corrective Action:	The facility sent documentation to the Department on 10.24.12, returning to compliance.

Type:	Violation

Rule: 279.22(d)

Explanation: There were two used oil stains underneath the tanker truck. There was a tanker truck in the vehicle staging area with a hose leaking used oil to the ground. The facility did not stop and contain the releases of used oil and clean up the release.

Corrective Action: The facility sent documentation to the Department on 10.24.12, returning to compliance.

Type: Violation

Rule: 62-710.401(6)

Explanation: Five containers of used oil in the non-hazardous waste storage area were not closed.

Corrective Action: The facility sent documentation to the Department on 10.24.12, returning to compliance.

Areas of Concern

Type: Area Of Concern

Rule: 262.11

Explanation: The facility did not make a hazardous waste determination on three batteries stored in the Vehicle Staging Area. The facility should make a determination on if the batteries are reusable or if they are spent. Spent batteries should be sent for regeneration.

Corrective Action: The facility submitted documentation to the DEP on 10.24.12, returning to compliance.

Type: Area Of Concern

Rule: 273.15(c)

Explanation: The facility did not date its universal waste bulb container or provide an alternate demonstration of the length of time the bulbs had been stored.

Corrective Action: The facility should either date its container or otherwise demonstrate (through disposal records or inspections) that bulbs are not kept on-site for over one year.

The facility sent documentation to the Department on 10.24.12, returning to compliance.

PHOTO ATTACHMENTS:

Photo 1

Photo 2

Photo 3

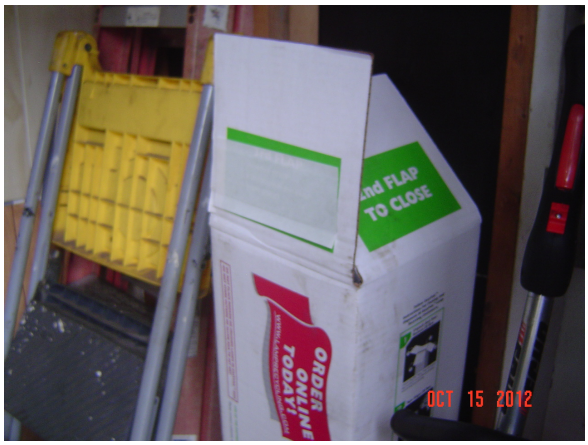

Photo 4 - oil leak under tanker

Photo 5 - oil leak under tanker

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.

Jabe Breland III	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	1/25/2013
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Supervisor: **Jabe Breland III** **Inspection Approval Date:** 01/25/2013

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.