



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 02 2013

Ashwin Patel
Hazardous Waste Manager
Hazardous Waste Program
Florida Department of Environmental Protection
Northeast District
7777 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

SUBJ: RCRA Compliance Evaluation Inspection
Liquid Environmental Solutions
EPA ID Number: FLD981928484

Dear Mr. Patel:

On October 15, 2012, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at Liquid Environmental Solutions, located at 1640 Talleyrand Avenue in Jacksonville, Florida, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is a copy of the EPA RCRA inspection report. If you have any questions regarding this matter, please contact Paula A. Whiting, of my staff, by phone at (404) 562-9277, or by email at whiting.paula@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry L. Lamberth".

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance
Branch

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 02 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: RCRA Compliance Evaluation Inspection
Liquid Environmental Solutions
EPA ID Number: FLD981928484

Dear Mr. Turovsky:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the October 15, 2012, inspection of Liquid Environmental Solutions located at 1640 Talleyrand Avenue in Jacksonville, Florida. This was an EPA Compliance Evaluation Inspection for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Florida Department of Environmental Protection (FDEP).

If you have any questions regarding this matter, please contact Paula A. Whiting, of my staff, by phone at (404) 562-9277, or by email at whiting.paula@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry L. Lamberth".

Larry L. Lamberth
Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance
Branch

Enclosure

cc: Jabe Breland, III, Hazardous Waste Program, FDEP

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
RCRA and OPA Enforcement and Compliance Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Liquid Environmental Solutions
1640 Talleyrand Avenue
Jacksonville, Florida 32206
Duval County
EPA ID: FLD981928484

3) Responsible Official

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

4) Inspection Participants

Yuri Turovsky	Liquid Environmental Solutions
Jabe Breland	FDEP
Melissa Padgett	FDEP
Paula Whiting	US EPA

5) Date and Time of Inspection

October 15, 2012 at 9:45 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710, 62-730, and 62-737.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Liquid Environmental Solutions, EPA ID# FLD981928484 with the applicable regulations.

8) Facility Description

Liquid Environmental Solutions (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. 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. The LES facility is located on 1.6 acres. The facility currently has 23 permanent employees working four shifts, 24 hours a day, 7 days a week.

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). The water is then chemically treated to adjust the pH in order to induce coagulation and flocculation. Treated wastewater is discharged to the local publicly owned treatment works (POTW), JEA-Buckman Wastewater Treatment Plant.

The incoming shipments of used oil are sampled for total organic halogens (TOX) 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 DAF. 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 portion receives further treatment and processing, and is then discharged to the POTW.

Samples are also taken of incoming shipments of oily wastewater. TOX 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.

The solids, sludges and 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 and residues per month, and 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 and residues generated at the facility. LES performs one analytical test per quarter on a random roll-off containing the solids, sludges and residues.

The facility is a registered used oil filter processor; however, the facility does not process the used oil filters it receives. The 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.

In the laboratory, the facility generates small amounts of waste laboratory solvents from Chlor-D-Tect and Chemical Oxygen Demand (COD) analysis procedures. LES has characterized the Chlor-D-Tect test waste as a D001/D006 hazardous waste. The COD test generates a D002/D007/D009 waste solvent. These two waste streams are collected in separate satellite containers located outside the laboratory. The hazardous wastes generated from laboratory operations are manifested for disposal to a properly permitted treatment, storage and disposal facility.

LES's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 22, 2012, characterized the facility as a conditionally exempt small quantity generator (CESQG) of hazardous waste, used oil processor (Permit # 72815-HO-009), a used oil transporter and transfer facility, off-specification used oil burner and an used oil fuel marketer.

Currently LES generates used oil, universal wastes, spent COD vials, spent TN/TP waste, waste solvent, spent aerosol cans and other wastes which include EPA Waste Codes D001, D002, D006, D007, D009, D011, and F003.

9) Previous Inspection History

On July 19, 2011, FDEP conducted a CEI at the facility and 14 RCRA areas of concern were noted.

10) Findings

Upon arriving at the LES facility (Picture 1), the inspectors entered the main office and were escorted to the conference room. Yuri Turovsky, General Manager, met with the inspectors in the conference room for an opening conference before escorting them around the facility. The inspectors presented their credentials to Mr. Turovsky at 9:45 a.m.

At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the FDEP and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Receiving Lab

Incoming trucks are required to go to the Receiving Lab first. The drivers give their manifests to the LES staff and then the trucks are sampled. Behind the Receiving Lab, the inspectors observed a secondary containment system with metal drainage grates going to the facility double walled sump (Pictures 2-4). The samples are pulled by the LES staff using composite liquid waste samplers (COLIWASA) in the trucks. The samples are poured into jars, labeled with the work order number, dated, tested and then preserved by refrigeration for 30 days (Pictures 5-6).

At the time of inspection, the inspectors observed a hazardous waste satellite accumulation area

(HWSAA) outside the entrance to the Receiving Lab (Pictures 7-8). The HWSAA contained a blue 55-gallon drum of Chlor-D-Tect waste. The drum was observed labeled and closed.

Inside the Receiving Lab, the inspectors observed a carton of spent COD vials and a carton of spent total nitrogen and total phosphorus (TN/TP) vials being collected (Pictures 9-10). The inspectors also observed a bench top with several bottles of expired 30-day receiving samples (Picture 11) staged to be poured into the drainage system.

10.2 Analytical Lab

The inspectors were told the Analytical Lab was under renovation because of the water leaks in the ceiling. The Analytical Lab was where the COD and TN/TP tests were originally conducted prior to the renovations. The HWSAA for the spent COD vials was located outside the Analytical Lab in the Maintenance Area (Pictures 12-13). The HWSAA for the spent TN/TP vials was located in a storage room inside the Analytical Lab (Pictures 14-15). Both blue 55-gallon drums were observed labeled and closed. Currently the COD and TN/TP vials were being tested in the Receiving Lab and taken to the Analytical Lab HWSAAs.

At the time of the inspection, the inspectors observed two boxes of green capped vials labeled with work order numbers (Picture 16). When the inspectors asked Mr. Turovsky what the vials were being stored for, Mr. Turovsky explained that the Spectro Ciros CCD Inductively Coupled Plasma Optical Emission Spectrometry equipment was not working, and LES could not run the metal analysis needed for the digested samples. Instead LES was collecting the vials to send to the LES facility in Chicago, IL for testing. Once the samples are analyzed, the Chicago facility would return the samples to Jacksonville for disposal into the facility sump and back into the process.

The inspectors also observed a five-gallon container with a tube draining into it from the CETAC Auto Sampler. Mr. Turovsky explained that low concentration nitric acid was used to flush the sampler. The spent nitric acid is then dumped into the lab sink which discharges into the facility sump. The sump system feeds into the oil/water separator, waste water treatment plant and the used oil processing.

10.3 Used Oil Processing

The Used Oil Processing area has three loading bays, a drainage grate that runs the length of the facility, a filter press, wastewater tanks (Picture 17) and a maintenance shop. The maintenance shop is used for small onsite repairs. The inspectors did not observe a part washer, spent aerosols or solvent use in this area. The entire facility is built upon secondary containment that drains directly in a doubled walled sump with a reversible pump.

The inspectors observed that the used oil receiving tank has a trash separator and an additional secondary containment filled with used oil (Pictures 18-20). Mr. Turovsky explained that the secondary containment around the separator was pumped out every day and the oil spills around the separator are washed to the drainage grate discharging to the sump. The solid waste removed from the used oil separator is analyzed for hazardous constituents prior to being sent to an industrial landfill.

At the time of the inspection, the inspectors observed a container with a PVC pipe connected to a

hose inside. Mr. Turovsky explained that the container was used to catch the flushed Weatherford AS 35, a demulsifier, from the PVC pipe, after the chemical is added to Tank TK-16, Chemical Heating Tank, for treatment of the used oil (Picture 21). The container was not labeled to identify use or content.

10.4 Chemical Storage

LES stores non-hazardous waste drums and totes (Picture 22) in a metal rack opposite the Chemical Heating Tank. Mr. Turovsky explained that many of the chemicals received at LES were proprietary chemicals no longer used by companies. LES found that these chemicals could be blending into the process to precipitate metals from the used oil. The inspectors recommended that LES not label the proprietary chemicals as non-hazardous waste when the chemicals are used in the process. The inspectors observed a 55-gallon drum of used oil filters and two unknown product drums without labels (Picture 23). Mr. Turovsky stated that the drums would be identified.

On October 24, 2012, Mr. Turovsky emailed the EPA and FDEP, stating that the unknown drums were identified and labeled "TR-50". TR-50 is manufactured and sold by Wastewater Specialists Technologies, LLC. TR-50 is a polythiocarbonate based precipitant of heavy metals from industrial process wastewaters, including metals from chelated/complexed environments. LES also receives and uses MR-40. MR-40 (Metal-Rec 40) is a sodium dimethyldithiocarbamate-based formulation that is designed to provide treatment of heavily chelated metal waste streams. MR-40 is manufactured and sold by Southern Water Treatment Company, Inc.

The inspectors also observed a metal trash can filled with debris from the used oil trash separator (Picture 24). A smaller used oil separator was located beside the Chemical Storage area (Pictures 25). No hazardous waste was observed in this area.

10.5 Non-Hazardous Waste Storage

LES has a designated non-hazardous waste storage area located near the wastewater treatment plant. The area contained drums of used oil, sludge, used absorbent and petroleum contact water (Pictures 26-28). The inspectors observed five 55-gallon drums missing lids or bungs. **The EPA recommends LES reference F.A.C. Chapter 62-710.401(6), if tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather.**

10.6 Wastewater Treatment Plant

Incoming wastewater is placed in Tank TK-01. Depending on the waste stream LES may feed into Tank TK-06 for DAF and then add caustic, polymer, flocculant and/or proprietary chemicals. Residue forms on the top of the wastewater and is skimmed from the surface, while the finished effluent is sent to the treated water tanks (Picture 29) and tested for pH and COD. No hazardous waste was observed in this area.

10.7 Sump and Oil/Water Separator

The sump is located at the lowest point in the facility (Pictures 31-33). The underground sump receives all PCW and used oil received at the facility via centralized drainage grate (Picture 30). The grate runs the length of the facility and discharges directly to the sump. At the time of the inspection, the inspectors observed the drainage grate and the sump grate filled with used oil and accumulated sludge.

The inspectors observed the oil/water separator and the solidification tanks (Pictures 34-37). LES placed metal screens inside the solidification tank closest to the oil/water separator and then pours the incoming used oil and water mixed with debris and solids into the tank. The screen is used to keep the trash and solids away from the vacuum as it pumps out the oil and water. The residual trash and solids were transferred to the adjacent solidification tank and mixed with material to dry out the residual for disposal at the landfill

10.8 Discharge Unit

LES generates two waste streams that the facility discharges to the POTW (Pictures 38-39). The POTW is required to monitor centralized waste treatment (CWT) organics and CWT oils and metals at separate points, and then monitored again at a combined point.

10.9 Spill Contingency Shed

The spill contingency shed (Picture 40) holds the spill supplies and on the inside door was a facility map and an inventory list of the supplies (Pictures 41-42). The shed is inventoried every two months and inspected monthly. At the time of the inspection, the inspectors observed that the inventory in the shed and the inventory list posted was not consistent. Items used or taken from the shed had not been replaced. No hazardous waste was observed in this shed.

LES appears to be in violation of F.A.C. Chapter 62-710. 210(2) [40 C.F.R. § 279.52(b)(2)(v)], (v) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

10.10 Vehicle Staging Area

The vehicle staging area was enclosed behind a chain link fence and held the LES tanker trucks. The inspectors observed a pallet with three lead acid batteries, a tanker truck with a hose leaking oil on the ground, four open and empty frac tanks, a 55-gallon drum of diesel used for cleaning out the frac tanks and a metal trash bin with discarded used oil personal protective equipment (Pictures 43-45). The inspectors pointed out to Mr. Turovsky that the lead acid batteries were not identified as usable or discarded, the tanker truck had two oil stains underneath it and the metal trash bin was not labeled "Used Oil"

LES appears to be in violation of F.A.C. Chapter 62-730.160(1) (40 C.F.R. § 262.11), which requires that a generator make a hazardous waste determination on solid wastes at its facility. It appears that LES failed to make a hazardous waste determination on the three lead acid batteries located in the Vehicle Staging Area.

LES appears to be in violation of F.A.C. Chapter 62-710.210(2) [40 C.F.R. § 279.22(d)], Upon detection of a release of used oil to the environment that is not subject to the requirements of part 280, subpart F of this chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, a generator must perform the following cleanup steps:

- (1) Stop the release;**
- (2) Contain the released used oil;**
- (3) Clean up and manage properly the released used oil and other materials; and**
- (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.**

LES appears to be in violation of F.A.C. Chapter 62-710.401(6) [40 C.F.R. § 279.22(c)(1)], No person may store used oil in tanks or containers unless they are clearly labeled with the words "Oily Waste" and are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather.

10.11 Universal Waste Lamp Storage

The inspectors observed that the universal waste lamps were stored in a utility closet (Pictures 46-47). The box was open, labeled per F.A.C. requirements and did not have an accumulation start date.

LES appears to be in violation of F.A.C. Chapters 62-737.400(5) [40 C.F.R. § 273.15(d)(1)]. Handlers and transporters shall manage universal waste lamps and devices in a way that prevents breakage, releases of their components to the environment, and their exposure to moisture.

LES appears to be in violation of F.A.C. Chapters 62-737.400(7) [40 C.F.R. § 273.15(c)]. A handler shall not store for more than one year, or a transfer facility for more than ten days, universal waste lamps or devices from the date of generation or from when they were first received, respectively. Handlers and transfer facilities shall be able to demonstrate the length of lamp or device storage as specified in 40 C.F.R. § 273.15 or 273.35 as adopted by reference under Rule 62-730.185, F.A.C.

10.12 Records Review

After the walkthrough, the inspectors requested the training records, the Used Oil Permit, the Spill Prevention, Control, and Countermeasure (SPCC) Plan, the Waste Profiles, specific work orders, weekly inspections and the 2010-2012 hazardous, non-hazardous, used oil and the universal waste manifests and non-hazardous and hazardous waste profiles. The generator status notification (EPA Form 8700-12) was last updated March 22, 2012.

The training records for entire facility were reviewed. Used oil training module was conducted for the LES staff on May 17, 2012, and the annual SPCC Plan training conducted on May 18, 2012. The curricula for both training modules were reviewed. No deficiencies were observed.

The Used Oil Permit # 72815-HO-009 was reviewed. The permit was issued on June 3, 2008, for a used oil processing facility with a container storage area and tank storage and processing areas. The permit covers 66 aboveground storage tanks consisting of: 22 used oil tanks, nine oily water tanks, two petroleum contact water tanks, seven sludge tanks, three sludge and oily water tanks, 15 waste water tanks, two fuel tanks and six hazardous waste tanks. On September 19, 2012, LES submitted an application for permit renewal. FDEP is currently reviewing the renewal application. In the renewal application, LES has applied for closure of all LES Hazardous Waste Tanks 6 and 81-87.

These tanks were not observed in use at the time of the inspection.

The inspectors requested the SPCC Plan, updated June 1, 2011. The plan included a current emergency contact list, fire extinguisher map, evacuation map and a list of emergency response equipment. Documentation (i.e., green return receipt cards) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) was available.

A SPCC inspection was conducted by Region 4 Superfund on November 11, 2011. A notice of violation was sent to LES on February 9, 2012, with two SPCC plan violations. Mr. Turovsky stated that LES responded to the notice of violation via email.

Waste profiles for Jacksonville Pollution Control and Southern Petroleum Systems were reviewed via the LES electronic database. The waste profiles had been on file since 1999 and 1997, respectively.

The inspectors requested work order numbers 133381, 134534 and 134440, as observed on three drums in the Non Hazardous Storage. The work order 133381 listed SWS Environmental as the transporter and CSX as the generator of two drums of non hazardous waste sorbents with hydraulic oil; work order 134534 listed SWS Environmental as the transporter and FedEx as the generator of one drum of diesel sorbents; and work order 134440 listed SWS Environmental as the transporter and Coca Cola as the generator of recovered diesel fuel. Mr. Turovsky also provided a sampling result for polychlorinated biphenyls (PCBs) testing of the on-site final product tank. The Jacksonville facility ships the sample quarterly to the Chicago, IL facility. The latest results of 0.671 ppm PCBs were dated July 13, 2012.

The inspectors reviewed the Used Oil Analysis Plan, updated December 9, 2009. No deficiencies were observed.

Weekly inspections records for the tanks, valves, joints, flanges and pipes were provided. The last dated inspection was October 12, 2012. The inspectors observed that the September 6, 2012, inspection record was incomplete. Mr. Turovsky corrected the record during the inspection.

Hazardous and non-hazardous manifests were reviewed for Calendar Year 2012. Hazardous wastes were removed and disposed of by EQ Florida, Inc. (EPA ID FLD981932494) in Tampa, FL. The land disposal restriction forms and certificates of disposal were reviewed and no issues were observed during the review.

Non-hazardous waste was transported to Camden County C & D Industrial Landfill in Woodbine, GA.

Universal wastes lamps were removed and disposed of by EQ Florida, Inc. (EPA ID FLD981932494) in Tampa, FL.

LES did not receive any incoming shipments of used oil in September and October, 2012. Outbound shipments of used oil were sent to January Environmental Services (EPA ID FLD982162943) in Bartow, FL and Petrotech Southeast Inc. (EPA ID FLR000159541) in Astatula, FL. Used oil filters

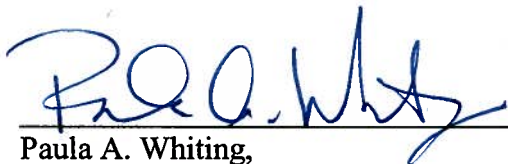
were sent to Clark Environmental (EPA ID FLD984206003) in Mulberry, FL.

Incoming PCW was received from Chevron Product Company; First Coast Energy; Air National Guard, Jacksonville, FL; Florida Gas Transmission, Maitland, FL; Retail Strategies, Jacksonville, FL; Seaport Canaveral Corporation, Cape Canaveral; Exxon; Guardian Fueling Technology Jacksonville, FL; Jacksonville Electric Authority Northside and Kennedy Generating Stations; Massey Logging; Vopak Terminal, Savannah GA; Stubbs Oil, Statesboro, GA; Cliff Berry Inc., Jacksonville, FL; Colonial Terminals, Savannah, GA; West East Trading Company, Jacksonville, FL; and ICE, Savannah, GA.

11) Conclusion

The inspectors conducted the exit meeting with Mr. Turovsky. During this meeting, the EPA and FDEP presented the preliminary results of the inspection. LES was inspected as a conditionally exempt small quantity generator of hazardous waste and an used oil processor and transporter. At the time of the inspection, LES did not appear to be in compliance with the requirements of RCRA. On October 24, 2012, Mr. Turovsky emailed the inspectors documentation of corrected items observed during the inspection.

12) Signed



Paula A. Whiting,
Environmental Engineer

1/02/13
Date

Concurrence



Larry L. Lamberth
Chief, South Enforcement and Compliance Branch
RCRA Division

1/02/13
Date

ATTACHMENT A

LIQUID ENVIRONMENTAL SOLUTIONS

JACKSONVILLE, FLORIDA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

OCTOBER 15, 2012



Picture 1 – Facility Sign



Picture 4 – Receiving Lab Sample Area Coli-wasa Storage



Picture 2 – Receiving Lab Sample Area



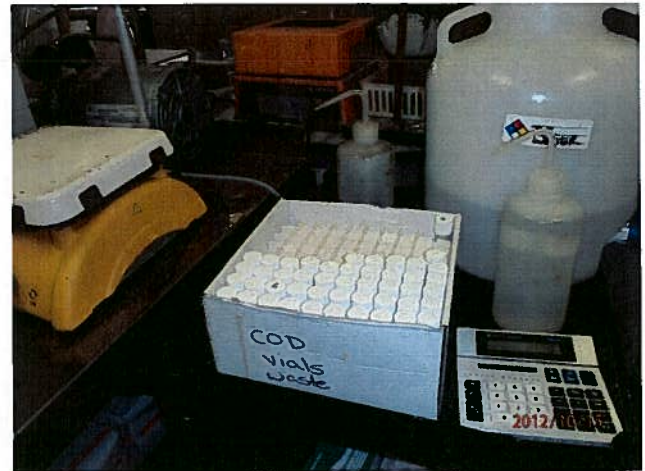
Picture 3 – Receiving Lab Sample Area Sump



Picture 5 – Receiving Lab Sample Storage



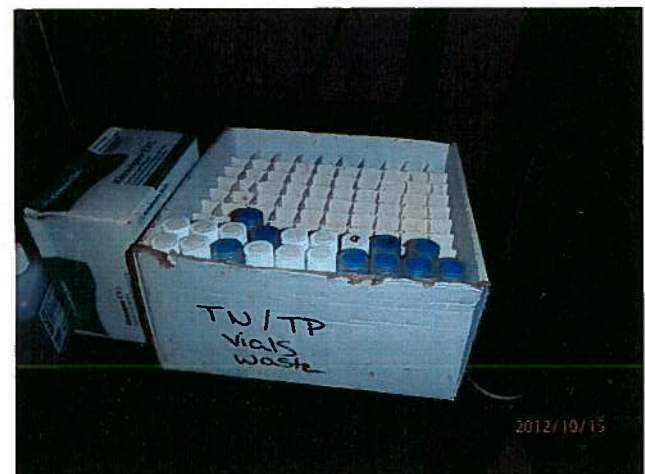
Picture 6 – Receiving Lab Samples



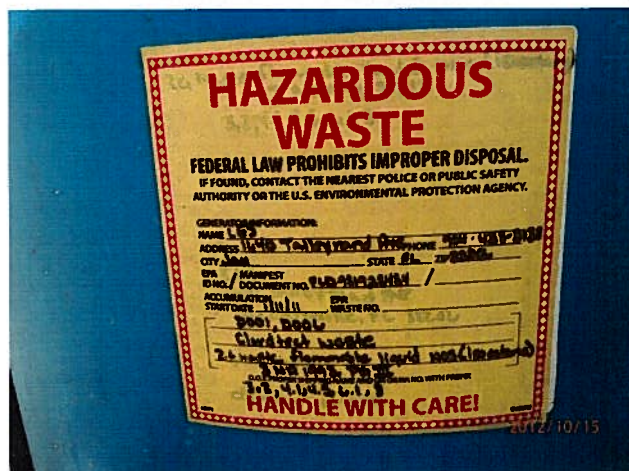
Picture 9 – Receiving Lab COD Vial Waste



Picture 7 – Receiving Lab Chlor Detect SAA



Picture 10 – Receiving Lab TN/TP Vial Waste



Picture 8 – Receiving Lab Chlor Detect SAA label



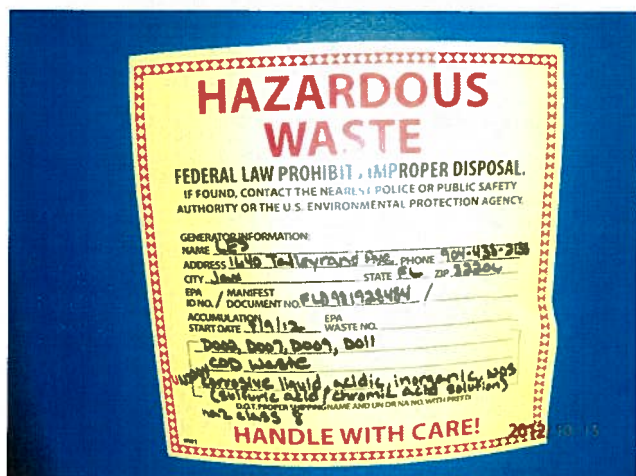
Picture 11 – Receiving Lab Samples to be discarded



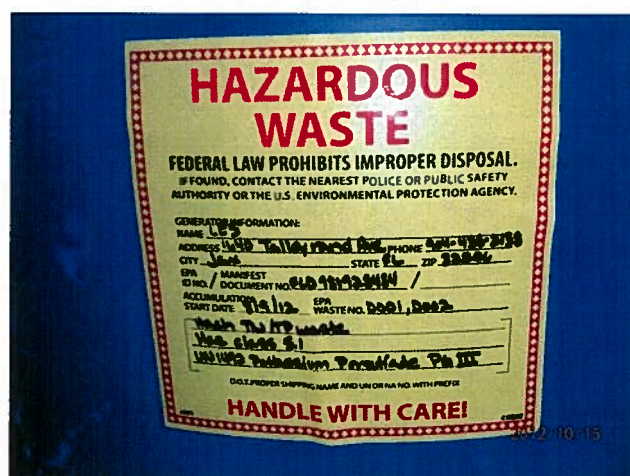
Picture 12 – Analytical Lab COD waste SAA



Picture 14 – Analytical Lab TN/TP waste SAA



Picture 13 – Analytical Lab COD waste SAA Label



Picture 15 – Analytical Lab TN/TP waste SAA label



Picture 16 – Analytical Lab metal sample vials



Picture 17 – Filter Press Area



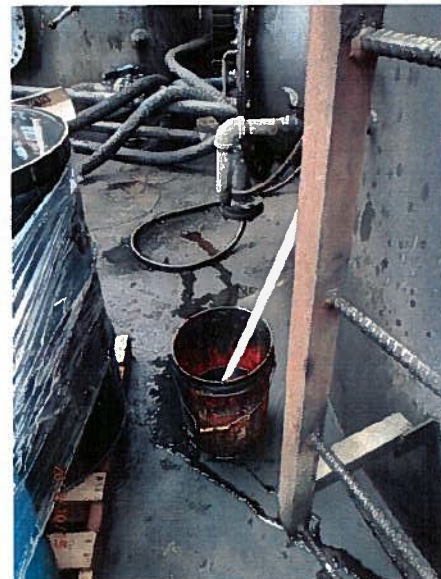
Picture 18 – Used Oil Processing trash separator



Picture 19 – Used Oil Processing trash separator overflow



Picture 20 – Used Oil Processing trash separator secondary containment



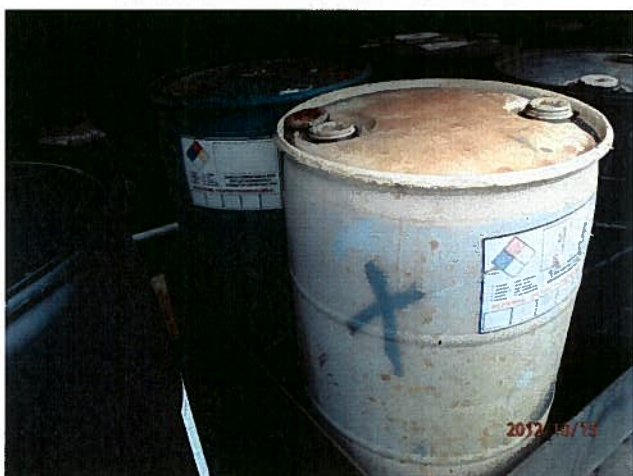
Picture 21 – Used Oil Processing Chemical Tank flush bucket



Picture 22 – Chemical Storage Rack



Picture 25 – Used Oil Processing trash sorting area



Picture 23 – Chemical Storage Rack with unknown drums



Picture 26 – Non-Hazardous Waste Storage



Picture 24 – Used Oil Processing trash bin



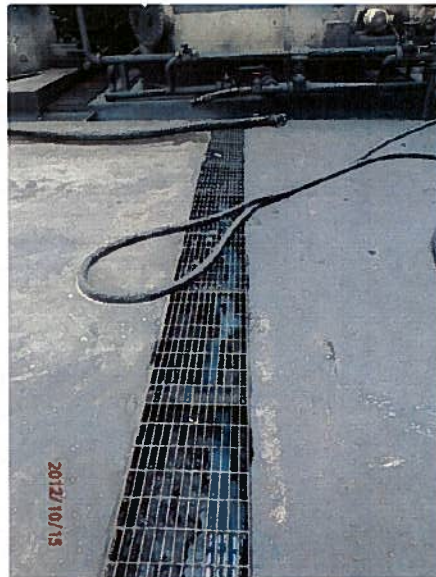
Picture 27 – Non-Hazardous Waste Storage drums with open bungs



Picture 28 – Non-Hazardous Waste Storage drums with open bungs



Picture 29 – Waste Treatment Processing effluent skimmer



Picture 30 – Discharge grate to the Sump



Picture 31 – Sump



Picture 32 – Sump



Picture 33 – Sump



Picture 36 – Oil Water Separator



Picture 34 – Solidification Tanks



Picture 37 – Solidification Tanks



Picture 35 – Oil Water Separator and Solidification Tanks



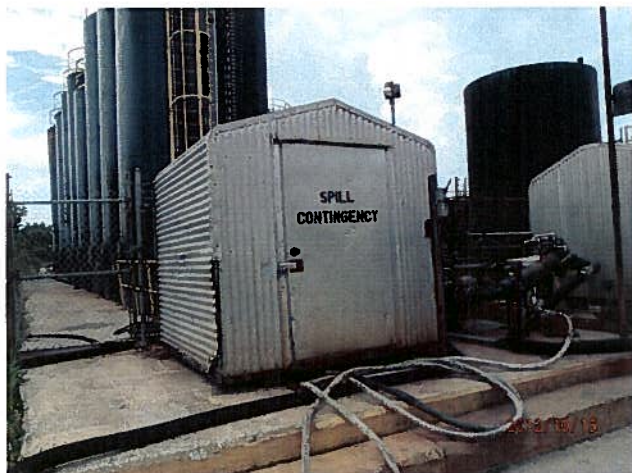
Picture 38 – JEA Lift Station



Picture 39 – JEA Lift Station



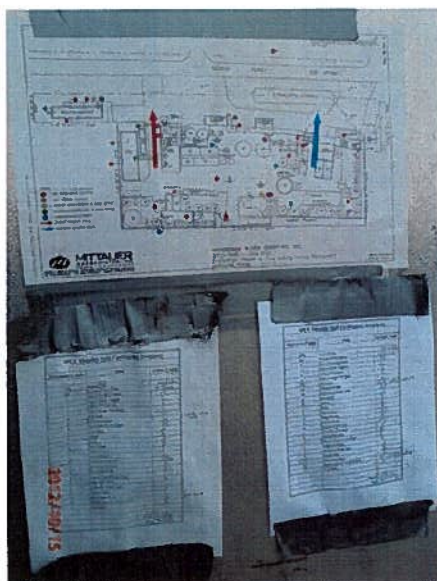
Picture 42 – Spill Contingency Shed Inventory



Picture 40 – Spill Contingency Shed



Picture 43 – Vehicle Staging Area pallet of batteries



Picture 41 – Spill Contingency Shed Map and Inventory



Picture 44 – Vehicle Staging Area leaking oil spills



Picture 46 – Lamp Storage box open



Picture 45 – Vehicle Staging Area used oil rag trash bin



Picture 47 – Lamp Storage box undated but labeled