



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

FACILITY INFORMATION:

Facility Name: Kelly Tractor Company

On-Site Inspection Start Date: 02/12/2013

On-Site Inspection End Date: 02/12/2013

ME ID#: 57627

EPA ID#: FLD981925811

Facility Street Address: 8255 NW 58th St, Doral, Florida 33166-3493

Contact Mailing Address: 8255 NW 58th St, Doral, Florida 33166-3406

County Name: Miami-Dade

Contact Phone: (305) 592-5374

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bridjette Bucell, Inspector

Other Participants: Chester Wendell, Environmental Specialist; Mike Isom, Safety and Environmental Manager

LATITUDE / LONGITUDE: Lat 25° 49' 41.7103" / Long 80° 19' 54.8871"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Kelly Tractor (Kelly) is a business which provides rental, sales, and servicing of heavy equipment. The facility is approximately 50 acres in size and is located in a commercial area. There are approximately 250 employees. The facility is connected to public utilities, and has been in operation at the current location since the 1970's.

Kelly is located just west and contiguous to Pan Tropic Power (PTP) EPA ID# FLD982091787. PTP was inspected by the Department on January 24, 2012. The Kelly Forklift Division is located at the PTP address. The inspection of the Forklift Division was conducted separately on February 26, 2012.

COMPLIANCE HISTORY

Notified with the Department as a Small Quantity Generator, Small Quantity Handler, Used Oil Transporter, Used Oil Transfer Facility, Used Oil Transporter, and Used Oil Filter Transfer Facility on May 10, 2012. The notification was properly posted at the facility.

A Compliance Assistance Site Visit (CASV) was conducted on November 21, 2012.

Process Description:

As a result of processes conducted at the facility waste streams include used oil, batteries, used oil

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filters, used antifreeze, mercury bulbs, paint related waste, used rags, aerosol can waste, and mineral spirits.

The facility consists of four building. Building one, is the far west building that contains the large accessory equipment storage. Building two, is a smaller building just east of the accessory equipment building, that appears to also contain large parts storage. Building three, is the southern most and largest building containing offices, parts and product storage, and the workshop. The fourth building, to the northeast, contained the paint booth and equipment wash rack.

Building One

No hazardous waste appeared to be generated in this area.

Building Two:

Storage Area

The facility has purchased an Aerosolv System to puncture the aerosol cans. The crushed aerosol cans are then added to the facility's scrap metal for recycling.

The facility has three (3) sodium hydroxide solution parts washers in the main shop and approximately fourteen (14) mineral spirits parts washers spread throughout. Each parts washer unit has a filtration device on the back of the unit; therefore, the fluids are only changed out if they are extremely dirty. The parts washers labeled "Wash" have 15 micron filters on the back that are changed out about every 2 to 3 months. The parts washers labeled "Finish" have 6 micron filters on the back that are changed every 2 weeks. The used filters are added to the facility's used oil filters handled by FCC Environmental. The facility is in the process of changing the solvent in the parts washers to a non-hazardous degreaser.

Eight (8) drums of hazardous waste was observed in this area. All of the drums were labeled, dated, and stored properly.

Building Three:

Spec Shop

Two large sodium hydroxide parts washers are in this area. FCC Environmental Services (FCC) removes the waste from these parts washers as hazardous waste.

Main Shop 1

Nine parts washers are spread out throughout the shop area.

Main Shop 2

The facility has a small sand blast room with bead blast media. It has been several years since the machine has been used or media has been disposed; therefore, there were no historical receipts or analysis available for review. The inspector discussed the necessity of a waste determination on the material prior to the disposal of blast media.

On the other side of the paint booth there is a large sand blast room that uses Aluminum Oxide media. Three (3) in-use 55-gallon drums sit under the filter bank labeled "Hazardous Waste". A past sample of the media indicated that it was hazardous waste due to Chromium.

A large paint booth is also located in this area. Two 55-gallon drums of paint waste were observed stored on secondary containment pallets just outside the paint booth. One drum was labeled "Paint Rag Waste" dated 11-02-2012 and one drum was labeled "Paint Related Waste" dated 01-02-2013.

Two parts washers were also observed in this area.

Two vertical, steel, double-walled, 1,000-gallon above-ground tanks located for used oil are stored within a coated concrete secondary containment area. The tanks were labeled "Used Oil".

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Emergency response equipment, such as fire extinguishers and spill control material, were observed.

The facility has twelve (12) field service trucks. Four of them are Ford 750 models with 90 gallon tanks, and three have small 30-45 gallon tanks. The remaining fleet does not have tanks or specialize in used oil.

The facility transports only the used oil and used oil filters generated through the mobile servicing of their own equipment, which is leased to other facilities for use. As such, the facility is not subject to Rule 62-710.600, F.A.C., with the exception of (2)(e) for financial responsibility. As the facility transports its own used oil and used oil filters to its own central collection facility for storage prior to having the used oil picked up by a certified used oil transporter (FCC Environmental), it is also not subject to the additional record keeping and reporting requirements of Rule 62-710.510, F.A.C. The exclusion from these requirements were confirmed with Aprilia Graves of the Department's Hazardous Waste Regulation Permitting Section during the CASV inspection.

RECORDS REVIEW

The facility had three years worth of records for used oil, used oil filters, absorbents, and paint waste available for review and appeared to be in order. Disposal receipts were reviewed indicating removal by FCC Environmental. Spent batteries are taken by DEKA Batteries East Penn Manufacturing CO, who is the same company that delivers their new batteries.

Kelly has been performing container inspection logs of the facility's hazardous waste, has posted the required emergency response information next to accessible phones, has documented emergency response arrangements with local authorities, and was able to show proof of hazardous waste training for personnel.

Conclusion:

The facility appears to be in compliance.

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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.

Bridjette Bucell

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:**Karen Kantor

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.