



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 13, 2013

Mr. Michael Lesser, Safety & Hazardous Materials Reviews
Crowley Liner Services Inc
3001 Talleyrand Ave
Jacksonville, Florida 32206
michael.lesser@crowley.com

Re: Crowley Liner Services Inc
EPA/DEP ID: FLR 000 054 221
Duval County – Hazardous Waste

Dear Mr. Lesser:

Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on September 12, 2013. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report has been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager

Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Crowley Liner Services Inc

On-Site Inspection Start Date: 09/12/2013

On-Site Inspection End Date: 09/12/2013

ME ID#: 62506

EPA ID#: FLR000054221

Facility Street Address: 3001 Talleyrand Ave, Jacksonville, Florida 32206-3474

Contact Mailing Address: 9487 Regency Square, Jacksonville, Florida 32225

County Name: Duval

Contact Phone: (904) 727-2449

NOTIFIED AS:

Non-Handler

Transporter

Transfer Facility

INSPECTION TYPE:

Routine Inspection for Non-Handler facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Bob McFeely, ; Michael Lesser,

LATITUDE / LONGITUDE: Lat 30° 21' 26.0" / Long 81° 37' 35.0"

SIC CODE: 4213 - Trans. & utilities - trucking, except local

TYPE OF OWNERSHIP: Private

Introduction:

Crowley Liner Services Inc (Crowley) was inspected by the Department's Hazardous Waste Section on September 12, 2013, as an unannounced hazardous waste compliance inspection. The facility notified the Department that it was operating two hazardous waste transfer facilities on Talleyrand Avenue in Jacksonville, Florida. The two locations are 3001 (FLD085092146) and 1163 (FLR000054221) Talleyrand Avenue. Both facilities were inspected and are included in this report. Mr. Robert McFeeley, Director of Safety, Health and Hazardous Materials, was present throughout the inspection. A follow up inspection was conducted on October 3, 2013, with Michael Lesser, Safety and Hazardous Materials Manager, to review records.

Crowley also operates a maintenance facility across the street at 1150 Talleyrand Avenue. That facility was not a part of this inspection.

Crowley serves as a transporter of hazardous materials and waste through its ocean-going barge and intermodal fleet transport operations. Crowley transports hazardous material/waste and other cargo between Puerto Rico, US Virgin Islands, other Caribbean ports, and Jacksonville via triple decked barges. Each barge is capable of accommodating over 400 trailers (cargo or tank), which upon arrival at their respective terminal destinations are staged pending transport to final destinations.

Process Description:

Transfer Operations:

Inspection Date: 09/12/2013

Hazardous waste transfer operations occur at both locations. When vessels dock at the port, containers of hazardous waste are off-loaded and inspected carefully prior to being placed into the freight transfer yard. The yard does not have designated spots for hazardous waste, but all of the containers are stored on a man-made surface capable of preventing spills or releases to the ground. According to Mr. McFeeley, the containers are usually removed from the transfer yard within a couple of days, but that they do not stay on-site for more than 10 days. At the time of the inspection, no hazardous waste containers were being stored on the 3001 Talleyrand parcel.

3001 Talleyrand Avenue:

The 3001 Talleyrand location is a Non-Handler of hazardous waste.

Records:

A records review was performed on October 3, 2013, with Michael Lesser. At the time of the inspection, the 3001 location was operating as a Non-Handler of hazardous waste. The records review included notifications to local authorities, contingency plan, SPCC plan, hazardous waste transporter and transfer facility registration/certification documentation. These records were in order.

The facility did not have the following documentation:

Annual hazardous waste employee training for transfer facilities - Section 62-730.171(4)(a), FAC.

Transfer facility closure plan required by Section 62-730.171(3)(a)(5), FAC.

Area of Concern: Although the facility was able to locate specific manifests when requested, it did not have a log that could quickly be accessed that identified which hazardous wastes are being stored on-site. Pursuant to Section 62-730.171(6), FAC, the facility shall maintain a written record or log of each shipment of hazardous waste that enters and leaves the facility. This log should include manifest number, date it enters and exits the facility, generator name and EPA ID number, amounts of hazardous waste and waste codes associated with each shipment. During the follow up visit, Mr. Lesser had created a log to track this information.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-730.171(3)(a)(5)
Explanation:	The facility did not submit a closure plan required for transfer facilities.
Corrective Action:	Subsequent to the inspection, the facility submitted this closure plan to the Department. No further action is required.
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Type:	Violation
Rule:	62-730.171(4)(a)
Explanation:	The facility did not have annual hazardous waste training for employees.
Corrective Action:	The facility representative attended a hazardous waste training class in November. This course was taught by a DEP representative. No further action is required.
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Inspection Date: 09/12/2013

Inspection Date: 09/12/2013

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

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

12/11/2013

DATE

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.