



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 11, 2013

Mr. Ryan Harris, Program Manager
Moran Environmental Recovery
251 Levy Road
Atlantic Beach, Florida 32233
rharris@horanenvironmental.com

Re: Moran Environmental Recovery
EPA/DEP ID: FLD 092 718 576
Duval County – Hazardous Waste

Dear Mr. Harris:

Department personnel conducted a compliance inspection of the above-referenced facility on October 16, 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: Moran Environmental Recovery LLC
On-Site Inspection Start Date: 10/16/2013 **On-Site Inspection End Date:** 10/16/2013
ME ID#: 44626 **EPA ID#:** FLD092718576
Facility Street Address: 251 Levy Rd, Atlantic Beach, Florida 32233-2613
Contact Mailing Address: 251 Levy Rd, Atlantic Beach, Florida 32233-2613
County Name: Duval **Contact Phone:** (781) 815-1100

NOTIFIED AS:

SQG (100-1000 kg/month)
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector
Other Participants: Ryan Harris, Program Manager; Mark Bergman, Business Development

LATITUDE / LONGITUDE: Lat 30° 20' 11.8525" / Long 81° 25' 9.1233"

SIC CODE: 1799 - Construction - special trade contractors, nec

TYPE OF OWNERSHIP: Private

Introduction:

Moran Environmental Recovery (MER) was inspected on October 16, 2013, as an unannounced hazardous waste compliance inspection. The facility was last inspected on 11/20/09, when it was operating as a hazardous waste transporter and used oil/used oil filter transporter. At the time of the inspection, the facility was still operating as a hazardous waste, used oil, and used oil filter transporter.

MER is an environmental services company which offers industrial and marine services, site remediation, decontamination and abatement services, and emergency spill response. Mr. Ryan Harris, Program Manager, was present for the inspection. The facility consists of offices, a maintenance shop, a wash pad, and a pole barn.

Process Description:

Maintenance Shop:

MER has several trucks and vehicles in service. General maintenance and repair of those trucks is performed in the Maintenance Shop.

The facility operates one parts washer, which an area technician stated has not generated any waste for several years. Once spent, proper a hazardous waste determination should be performed on this parts washer waste. Used oil is collected in three 55-gallon drums located inside the shop, which were properly labeled and on a containment pallet (Photo 1). The facility should ensure that this containment pallet can hold at least 110% of the largest used oil container on the pallet. Used oil filters are collected in a 55-gallon drum, which was properly labeled. Spent antifreeze is also

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collected in this area in a 55-gallon drum.

Universal Waste Area:

The facility collects E-waste and universal waste lamps in the corner of the maintenance shop. At the time of the inspection, the facility had several dozen lamps that were not in containers (Photo 2). The facility should store spent universal waste lamps in containers that are closed, secure, and labeled "universal waste lamps" [40 CFR 273.13(d) and 273.14(e)].

Wash Pad:

A large concrete pad located in the rear of the facility is used to park full tanker trucks and to wash them out. If MER picks up a load of oily water from a customer, and is not immediately able to transport it to Water Recovery LLC (WRI) for processing, the truck is parked on the pad and then taken to WRI the next morning. The facility also washes out the insides of their skids/tanker trucks onto the pad. This wastewater is allowed to drain into a sump, and it's either pumped directly into another tanker truck to be hauled to WRI, or it is pumped into a wastewater tank located on the pad (Photo 3).

Some parts of the pad contained cracks that appeared to have been resealed. This is an area of concern. Due to the potential for oily water to sit on this pad and potentially migrate through the cracks into the soil beneath the pad, the facility should inspect this pad on a regular basis and follow best management practices to reseat the pad and routinely check for new cracks as needed.

Pole Barn:

The Pole Barn contains two conex boxes full of spill control material and equipment. Large hoses and other parts and equipment are stored in this area. Also in this area is a secondary containment pad that had a couple of 55-gallon containers of product chemicals in one corner. In another corner of the pad were nine small buckets that were that were labeled "pending analysis." Just next to these closed buckets was an unlabeled 55-gallon poly drum that was full. Mr. Harris was unaware of the contents of these containers. Subsequent to the inspection, the facility identified eight of these buckets as either a product or a non-hazardous waste. The 55-gallon poly drum was tested and determined to be a D002 hazardous waste. This drum has been labeled and dated, and is currently awaiting disposal.

Record Review:

MER is currently operating as a hazardous waste transporter and used oil/used oil filter transporter. According to Mr. Harris, even though it is registered as a hazardous waste transporter, MER does not routinely transport hazardous waste. MER maintains its status as a hazardous waste transporter in case of emergency, but MER usually contracts out this activity. The last time MER transported hazardous waste was on 8/12/09, when it transported D002 sodium hydroxide solid mixtures. A copy of the facility's used oil and hazardous waste transporter registration was posted in the facility, and it is also maintained in all of the facility's vehicles. The facility's used oil transporter training manual was onsite and available for review. The latest employee training was performed on January 17, 2013.

The majority of MER's transportation operations consist of bilge water and oily waste water. This oily water is taken to WRI for processing, and it is called 'oily water' on its manifests. Used oil filters transported by MER are taken to WRI for disposal. Used oil generated at the facility is taken by MER to WRI (FLR000069062) on appropriate tracking logs.

Moran Environmental Recovery has been assigned the EPA ID number FLD 092 718 576. Please use this number on all correspondence with the DEP.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
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Rule: 273.13(d)

Explanation: The facility did not store its spent universal waste lamps in closed and secure containers.

The facility should also be able to demonstrate that these lamps are not being stored on-site for longer than one year.

Corrective Action: The facility sent documentation to the Department on 12.10.13, returning to compliance.

Type: Violation

Rule: 273.14(e)

Explanation: The facility did not store its spent universal waste lamps in containers that were properly labeled.

The facility should also be able to demonstrate that these lamps are not being stored on-site for longer than one year.

Corrective Action: The facility sent documentation to the Department on 12.10.13, returning to compliance.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3 - pad sump and WW tank in rear



Photo 4



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Photo 5



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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.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

12/10/2013

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.