



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JUN 21 1999

4WD-RCRA

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. William G. Marshall  
Compliance Manager  
Environmental Recovery, Inc.  
251 Levy Road  
P.O. Box 330569  
Atlantic Beach, Florida 32233-0569

SUBJ: RCRA Compliance Evaluation Inspection  
Environmental Recovery, Inc.  
EPA ID # FLD 092 718 576

Dear Mr. Marshall:

On May 20, 1999, a Compliance Evaluation Inspection was conducted by the United States Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP) at Environmental Recovery, Inc., located in Atlantic Beach, Florida, to determine the facility's compliance status with RCRA.

Enclosed is the EPA RCRA Site Inspection Report which indicates that no violations of RCRA were discovered. A copy of the report has been forwarded to FDEP. If you have any questions, please contact Laurie Benton, of my staff, at (404) 562-8597.

Sincerely yours,

Jeffrey T. Pallas, Chief  
South Enforcement and Compliance Section  
RCRA Enforcement and Compliance Branch

Enclosure

cc: Stephanie Syler, FDEP w/encl.  
Luis Campos, FDEP w/encl.

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Hazardous Waste Regulation

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Hazardous Waste Regulation

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA COMPLIANCE INSPECTION REPORT

1) INSPECTOR AND AUTHOR OF REPORT

Laurie Benton, Environmental Engineer

2) FACILITY INFORMATION

Environmental Recovery, Inc.  
251 Levy Road  
P.O. Box 330569  
Atlantic Beach, FL 32233-0569

EPA ID# FLD 092 718 576

3) RESPONSIBLE OFFICIAL

Steve Jenkins, President

4) INSPECTION PARTICIPANTS

Steven Jenkins, Environmental Recovery  
John Stribling, Environmental Recovery  
Tom Thompson, Environmental Recovery  
Luis Campos, FDEP Northeast District  
Stephanie Syler, FDEP Tallahassee  
Laurie Benton, USEPA Region 4

5) DATE OF INSPECTION

May 20, 1999

6) APPLICABLE REGULATIONS

40 C.F.R. Parts 260-270, RCRA Sections 3005 and 3007;  
Florida Administrative Code Chapter 62-730.

7) PURPOSE OF INSPECTION

To conduct a Compliance Evaluation Inspection (CEI) of Environmental Recovery, Inc. (ERI) as required under 3007 of the Resource Conservation and Recovery Act (RCRA), and to evaluate the facility's compliance status with applicable RCRA regulations.

8) FACILITY DESCRIPTION AND PROCESS SUMMARY

Environmental Recovery, Inc., operates an industrial cleaning and environmental contracting company which is based at 251 Levy Road, Jacksonville, Florida. The facility is a large quantity generator (LQG) of hazardous waste; a hazardous waste transporter and transfer facility; and a used oil generator, transporter, marketer, processor, and transfer facility. The company has entered into a Basic Order of Agreement with the United States Coast Guard and the EPA for oil spill and emergency response services, and they serve as an emergency response entity in Northeast Florida for the FDEP. Approximately 80 people are employed at the facility, and an average of 45 employees are on call 24 hours a day. In addition to the physical services provided by the company, ERI also serves as a hazardous waste broker to arrange hazardous waste pick-up for customers needing a permitted transporter and/or treatment, storage, or disposal facility.

Facility personnel reported that 99% of the work performed by the company is related to petroleum servicing and vacuum truck transport of industrial waste waters. Therefore, the majority of wastes generated are not regulated as hazardous wastes under RCRA. The LQG status of the facility is largely due to the volume of hazardous waste generated during tank and industrial cleaning operations at remote sites or contaminated media generated during emergency response activities. ERI often assumes generator status for wastes generated at other locations as a result of ERI operations. For example, ERI may assume generator status for the materials and residues generated during their tank clean-out and industrial cleaning operations at a remote location if the client's facility is a non-handler of hazardous waste.

According to ERI's Used Oil Processing Permit, No. H016-307137, the used oil processing tank system consists of eight above ground steel tanks, which operate through decanting and gravity separation. Facility personnel reported that five used oil transactions from outside generators were manifested to ERI this year. One shipment of used oil was sent from ERI last year. The average shipment of used oil from ERI consists of one full tanker load, which is between 5,000 and 6,500 gallons. Tank bottoms are cleaned from the used oil tank farm an average of once every six to twelve months. The material generally passes the TCLP analysis and is shipped as a nonhazardous waste to a special waste or industrial waste landfill.

Pursuant to the used oil processing permit, all incoming shipments of used oil, oily wastewater, or other industrial waste waters require a pre-approval waste profile before shipment to ERI. Upon arrival, the incoming material is sampled and a fingerprint analysis is run to verify the identity of the shipment. Waste streams which are accepted are unloaded from the waste haulers into the permitted used oil processing tanks for the stationary separation of oil, water, and solids. The water is decanted into an industrial water tank, and the used oil into a used oil storage tank. The facility is not connected to

the city sewer system, so all non-hazardous waste water is transported to an industrial wastewater processor.

Because ERI is not permitted to receive hazardous wastes, all hazardous waste shipments transported by ERI are destined for other facilities which are permitted to accept hazardous waste. The empty tankers and / or vacuum trucks are then returned to the ERI facility for clean-out. As the RCRA empty trucks arrive on-site, they are taken to the sumped work area next to the permitted used oil processing tanks to begin decon activities. Between two and five empty tanker trucks may be cleaned at the facility each day. Due to the nature of the materials transported and the generator liability for residual wastes, each tanker truck and vacuum truck is cleaned by hand to remove all residuals. ERI uses hot water and industrial grade soap to clean the tanker and vacuum trucks. Facility personnel follow confined space entry requirements to clean the vehicles, and the task is completed within 30-40 minutes. The waste solids generated through solid settling in the sump, through truck cleaning, or through decon operations are placed into rolloff containers in the center of the facility yard. A composite sample of the material contained in each rolloff is taken and analyzed for TCLP parameters before the material is sent off-site for disposal.

Although ERI has notified as a hazardous waste transfer facility, they have not constructed an area for conducting transfer facility operations. Occasionally, the facility may store hazardous waste in the center of the yard next to the rolloff containers for a maximum of 24 hours.

## 9) INSPECTION FINDINGS

- A. Used Oil Processing System Area - The layout of the used oil processing area is shown in Figure 1, which was found as attachment 1 of the used oil processing permit. Tank 5 has been taken out of service because ERI was not able to verify the structural stability of the tank. Therefore, tanks 1, 2, 3, 4, 6, 7, and 9 are part of the permitted processing system. Some other tanks in the area include a small empty vertical tank and a diesel fuel day tank. All permitted tanks were properly labeled, and no violations were noted in the used oil processing area.

The sumped work area is located on a concrete slab that is coated annually with epoxy coating. At the time of the inspection, some portions of the sumped work area had a cracked or peeling layer of epoxy coating. This problem was especially apparent near the sump grate. Although no obvious damage to the integrity of the containment system was noted, please note that Part 1 of the used oil processing permit, Specific Condition 1 requires the permittee to maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of used oil, sludges, residues or constituents to air, soil, or surface water which could threaten human health or

the environment. Continued peeling and cracking of the epoxy coating could lead to a violation of the operating permit.

- B. Pole Yard - ERI occasionally operates a pickling process which is located in a fenced, covered area known as the "Pole Yard." The pickling process was not in operation at the time of the inspection, and no acids were present in the pickling vats.

Four drums of unknown materials were located just outside the Pole Yard area. Two of the drums were labeled "Alkaline pH 12.5," one of the drums was noted "properties of Nitric Acid," and the last drum was noted "properties of Sulfuric Acid." At the time of the inspection, facility personnel believed the drums contained product materials which were left over from a previous job. In a letter dated June 8, 1999, ERI confirmed that one drum contained ammonium hydroxide, one contained sulfuric acid, one contained sodium hydroxide, and the last one contained Big G detergent. Although the primary focus of this CEI was the management of waste materials, please note that incompatible waste and/or product materials should not be stored in close proximity. Since the inspection, the drums have been labeled and placed in the appropriate storage areas.

- C. Product / Equipment Storage - Two storage sheds and one trailer were parked near the Pole Yard for secured storage. One shed contained material chemicals, solid form chemicals, oxidizers, and corrosives. The second shed and the trailer were used for equipment storage. Although no wastes were present in the storage units, the storage sheds were in relatively poor condition which increased the potential for product material management difficulties. Because the materials present in the storage shed, when spilled or leaking, may meet the definition of hazardous waste, facility personnel reported that they were researching options for a new product storage unit.
- D. Non-hazardous Waste Storage - ERI stores non-hazardous waste in a fenced area behind the product storage trailers. The most common non-hazardous waste stream generated on-site includes drained fuel filters and oil filters that are picked up by Grayco. At the time of the inspection, approximately thirteen 55-gallon drums of industrial waste solids generated at the Gate Products site were present in the area. Four 55-gallon drums of other industrial waste were also present in the area. ERI indicated that the non-hazardous material will be placed into the roll-off container for transportation off-site and disposal. No violations were noted in the non-hazardous waste storage area.
- E. Mechanics Shop - Truck repair and maintenance is done on-site by a full-time mechanic. The truck maintenance activities include battery replacement. NAPA exchanges new batteries for old batteries as needed at the facility mechanic's shop. The mechanic's shop uses one parts washer which recycles ZEP solvent through filter bags. According to facility personnel, the filter bags have never been replaced. EPA and FDEP personnel warned ERI that the filter bags may meet the definition of a hazardous waste when they

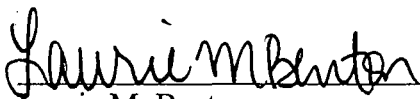
are no longer fit for reuse. EPA and FDEP recommended that ERI conduct a hazardous waste determination on the bags when it is necessary to replace them.

Another possible point of hazardous waste generation was noted in the mechanic's shop. According to the label, the carburetor cleaner used on-site contains methylene chloride. Therefore, the carburetor cleaner and any rags or absorbent used with the carburetor cleaner may meet the definition of a hazardous waste. No such waste streams were present in the shop during the inspection, but a hazardous waste determination should be conducted on the waste streams when/if they are generated on-site.

A few small boats were located in the facility yard near the mechanics shop. One unmarked drum, which contained some liquid, was located near the boats. During the course of the inspection, facility personnel confirmed that the drum contained gasoline. It is ERI's policy to label every drum of waste and product materials on-site. Therefore, personnel labeled the drum, which was closed and in good condition.


- F. Paperwork Review - One hazardous waste manifest of wastes generated on-site was available for the current year. The manifest recorded a shipment of 5 gallons of xylene/toluene and 50 gallons of 111-trichloroethane. The waste was shipped by ERI to Perma Fix on April 28, 1999. Less than 30 days had passed since the shipment, but no signed copy had been returned. The facility's biennial report was electronically submitted to FDEP in February. Because ERI had not stored hazardous waste on-site, no hazardous waste inspection records were available. The hazardous waste contingency plan and training records were in compliance. No violations were noted during the paperwork review.

10) SIGNED

  
Laurie M. Benton  
Environmental Engineer

6/16/99  
Date

11) CONCURRENCE

  
Jeffrey T. Pallas, Chief  
South Enforcement and Compliance  
Section  
RCRA Enforcement and Compliance  
Branch

6/17/99  
Date