



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 18, 2014

Jerry Stapp
Vice President
Lewis Environmental
1432 Cleveland Street
Jacksonville, Florida 32209
Jstapp@lewispetroleum.com

Re: Lewis Environmental
EPA/DEP ID FLR 000 048 561
Duval County – Hazardous Waste

Dear Mr. Stapp:

Department personnel conducted a Compliance Evaluation Inspection of the above-referenced facility on October 24, 2013. Based on the information provided during 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.

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 Pamela Fellabaum at (904) 256-1670 or via e-mail at Pamela.Fellabaum@dep.state.fl.us.

Sincerely,

Michael J. Fitzsimmons
Environmental Administrator
Compliance Assurance Program

Enclosures: Inspection Report



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

FACILITY INFORMATION:

Facility Name: Lewis Environmental

On-Site Inspection Start Date: 10/24/2013

On-Site Inspection End Date: 10/24/2013

ME ID#: 33637

EPA ID#: FLR000048561

Facility Street Address: 1432 Cleveland St, Jacksonville, Florida 32209-6400

Contact Mailing Address: 1432 Cleveland Street, Jacksonville, Florida 32209

County Name: Duval

Contact Phone: (904) 356-0731

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Jerry Stapp, Vice President, Credit and Compliance Officer

LATITUDE / LONGITUDE: Lat 30° 20' 27.6597" / Long 81° 40' 17.49"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

Lewis Environmental (Lewis) was inspected on October 24, 2013, as an unannounced hazardous waste compliance evaluation inspection. The facility was last inspected by the Department's Hazardous Waste Section on October 30, 2009. Lewis is currently operating as a used oil transporter/transfer facility, used oil filter transporter/transfer facility, petroleum contact water (PCW) transporter, and non-handler of hazardous waste. Lewis has been assigned the EPA ID number FLR 000 048 561. Please use this number on all correspondence with the DEP.

The facility sells product oil, lubricants, diesel, and gas. Lewis also transports used oil, used oil filters, and spent antifreeze. The facility has four employees and operates two tanker trucks and one box truck with two drivers. The facility consists of a tank farm, new oil warehouse, maintenance shop, tank painting area, and a non-hazardous roll-off. Mr. Jerry Stapp, Vice President and Compliance Officer was present throughout the inspection.

Process Description:

Tank Farm:

The Tank Farm area is split into two sections, used oil tanks and product tanks. In the used oil tank area, there were three 6,000-gallon tanks and one 12,000-gallon tank for used oil. All of these tanks were properly labeled and were located within secondary containment (Photos 1 -3). The secondary containment was dry, and the valve for the containment system was closed (Photo 4). Since the last inspection, the facility had cut

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a small hole in the secondary containment wall that divides the used oil from the product fuel tanks. The secondary containment area for the used oil tanks is at least 110% of the volume of the 12,000-gallon tank.

Inside the containment for the product tanks was one 250-gallon tank for used oil. Mr. Stapp stated that this tank is used when customers drop-off used oil at the facility. The tank was closed and properly labeled.

New Oil Warehouse:

Product oil, lubricants, and supplies are stored in this warehouse. In one area of the warehouse, used oil filters (Photos 5 and 6) and antifreeze (Photo 7) are off-loaded and stored. All containers observed were properly labeled.

Maintenance Shop:

Light maintenance on company fleet vehicles is performed in this area. Some used oil and used oil filter changes are done on-site.

Mechanics use BIC Brake Cleaner occasionally on a disposable rag. This solvent is non-hazardous on a rag, and these rags are thrown into the trash.

The Shop had one Dyna Clean parts washer, which Mr. Stapp said is not used and is empty of solvent.

Tank Painting Area:

Tanks are painted and prepped for customer use in this Area. According to an area employee, the tanks are painted with water-based paint and rollers. All clean up is performed with water. No hazardous waste is generated in the tank painting area.

The facility uses diesel fuel to test the pumps on customer tanks prior to delivery. The fuel is reused for the tests, and this practice does not generate a waste.

Non-Hazardous Roll-Off:

The facility has a small building that it uses to store a roll-off where non-hazardous waste is bulked (Photo 8 - 10). Oily absorbents, rags and grease is collected in this roll-off before being sent off-site.

Record Review:

Lewis is currently a used oil transporter/transfer facility, used oil filter transporter/transfer facility, a PCW transporter, and a non-handler of hazardous waste.

Used oil is recycled through Synergy, Independent Waste Oil or other similar facilities that purchase the oil. Used oil filters are recycled by Kellen Environmental, and antifreeze is recycled by Safeway. PCW is not stored at the facility. When transported, it is taken directly from the generator's facility to Liquid Environmental Solutions.

For used oil shipments from new customers, the facility uses a Chlor-D-Tect test kit to check for the presence of excess halogens. For used oil shipments from existing customers, the facility use a halogen detector to check for the presence of excess halogens.

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The facility has a parts washer maintenance service for customers. The parts washer solvent is a 142 degree Fahrenheit petroleum naphtha solvent that is then managed by Lewis as non-hazardous waste. An annual waste stream characterization is conducted for the customer. Lewis manages this waste stream as a fuel and it is sent to Liquid Environmental Solutions.

A review of the facility's records found them to be in order. Personnel training had been conducted, but not documented. The facility re-trained employees subsequent to the inspection and sent the training records to the Department. Insurance information was current, and the current Department registration letter was posted.

No violations were noted on the areas inspected.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo 10



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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.

Pam Fellabaum**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**2/18/2014**DATE****Supervisor:** Pam Fellabaum**Inspection Approval Date:** 02/18/2014

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.