



**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

April 11, 2014

Ms. Jan Barnes, Director - EH&S  
Jacksonville Transflo Terminal  
6735 Southpoint Drive S, #J-975  
Jacksonville, Florida 32216

**Re: Jacksonville Transflo Terminal  
EPA/DEP ID: FLD 984 253 526  
Duval County - Hazardous Waste**

Dear Ms. Barnes:

The Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on February 19, 2014. 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 Jabe Breland at (904) 256-1671 or via e-mail at [Jabe.Breland@dep.state.fl.us](mailto:Jabe.Breland@dep.state.fl.us).

Sincerely,

Vincent Clark  
Environmental Manager

Enclosure(s)



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

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**FACILITY INFORMATION:**

**Facility Name:** Jacksonville Transflo Terminal

**On-Site Inspection Start Date:** 02/19/2014

**On-Site Inspection End Date:** 02/19/2014

**ME ID#:** 21835

**EPA ID#:** FLD984253526

**Facility Street Address:** 3796 Warrington St, Jacksonville, Florida 32254

**Contact Mailing Address:** 500 Water St #J975, Jacksonville, Florida 32202-4423

**County Name:** Duval

**Contact Phone:** (904) 359-1323

**NOTIFIED AS:**

Non-Handler

Transporter

Transfer Facility

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Non-Handler facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Generator facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Jabe Breland III, Inspector

**Other Participants:** Matt Maschman, Terminal Manager; Melissa, Padgett

**LATITUDE / LONGITUDE:** Lat 30° 19' 34.8335" / Long 81° 43' 10.1917"

**SIC CODE:** 4013 - Trans. & utilities - switching and terminal devices

**TYPE OF OWNERSHIP:** Private, Private

**Introduction:**

Jacksonville Transflo Terminal (Transflo) was inspected on February 19, 2014, as an unannounced hazardous waste Compliance Evaluation Inspection (CEI). The facility was previously inspected by the Department's Hazardous Waste Section on April 30, 2010. The facility is currently operating as a Used Oil Transfer (UOT) facility, and is currently registered with the Department as a hazardous waste transporter, and a hazardous waste transfer facility. Transflo is not currently an active hazardous waste transporter/transfer facility, but wishes to maintain this registration in the event that they operate as such in the future.

The facility has been issued the EPA/DEP identification number FLD 984 253 526. Please use this number on all correspondence with the Department's Hazardous Waste Section.

Transflo is a rail-to-truck or truck-to-rail switch point for various materials including hydrogen peroxide, dry commodities, ethanol, and new and used oil. The facility has been in operation at this location, under various names, for approximately 28 years. CSX Transportation owns the property located at 114 Druid Street, while Transflo manages access to and maintains control of the facility. Day-to-day operations are contracted to Arrow Material Services, who supplies the workforce for such operations. Currently, Arrow Material Services employs eight people at this facility.

Inspection Date: 02/19/2014

Transflo is a subsidiary of CSX Transportation; however, the two entities operate independently of one another. CSX owns and operates the locomotives that pull the used oil and new materials that are picked up at the Transflo Terminal. Rail cars and tanker cars are independently owned or leased by the shipping company.

The facility is on city water and has a septic tank. Mr. Matt Maschmann, Terminal Manager, was present throughout the inspection. The facility consists of a rail yard, a shop area, and office space, spread over a nine acre lot.

### **Process Description:**

#### **Rail Yard**

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The facility has five loading tracks, with Tracks 1 - 3 designated for liquids. Used oil is always loaded from the northernmost track, Track 1. The facility currently accepts used oil for off-loading only from Heritage Crystal Clean (HCC). Used oil tanker cars have a capacity of approximately 28,000 gallons, and they are loaded with used oil over numerous trips. HCC transports and off-loads approximately 1,200 to 2,500 gallons of used oil to Transflo daily by truck. All used oil tanker cars are shipped off-site within 35 days from the date of the pumping of the first load into the car, regardless of whether the tank car is full. The facility maintains a log book on-site that documents the rail car number, the date of the first off-load, the total amount off-loaded, the anticipated date of removal, and the actual date of removal. At the time of the inspection, two double-walled used oil tanker cars were accumulating used oil. Both tanker cars were labeled with the words "Used Oil."

Secondary containment drip pans are provided beneath the tanker to catch drips and/or spills that may occur during off-loading. When it rains and the pans fill with water, the facility attempts to remove any oily sheen from the water with absorbents prior to discharging the rain water to the ballast rock bed beneath.

#### **Shop Area**

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Minor maintenance on facility equipment, including pumpers, is performed in the Shop Area. At the time of the inspection, one 55-gallon drum of used oil and one 55-gallon drum of used oil filters were accumulating. Both drums were properly labeled and located within secondary containment where applicable. No hazardous waste is generated in this area. All shop rags are laundered through Cintas.

At the time of the inspection, an employee was using a pressure washer to clean the hose of one of the pumpers that transfers products to and from the rail cars (Photo 1). According to Mr. Maschman, the facility has a standard of operation (SOP) that should be followed when performing this type of cleaning, including setting up a tarp and several absorbent pads to collect wastewater and contaminants during washing. However, the employee was not following the facility's SOP, and industrial wastewater that may have contained used oil and/or other contaminants was draining into the facility's storm water drainage system (Photo 2). This is an Area of Concern that has been referred to the Department's Waste Water Section for further review.

Subsequent to the inspection, the facility provided documentation of further training for all employees regarding equipment washing and the facility's SOP.

#### **Record Review**

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Transflo tracks tanker cars by their assigned numbers, and logs the following information into its computer system: car arrival date, product in car, shipper, first transfer date, projected release date, actual release date, and total dwell time. Contents of the cars are tracked by weight, not volume. No cars had been accumulating used oil on-site for greater than 35 days. The facility is

Inspection Date: 02/19/2014

reminded that used oil transfer facilities may only store used oil on-site for up to 35 days. Storage over 35 days requires a used oil processor permit from the Department.

Facility personnel appeared to receive adequate training in used oil management. The facility is maintaining up-to-date insurance as required pursuant to 62-710.600(1)(e), FAC.

Used oil generated on-site is recycled by Noble Oil Services approximately every six to twelve months.

Transflo has submitted its initial transfer facility notification and supporting documents as required by 62-730.171(3)(a), FAC. If the facility chooses to resume hazardous waste transportation or transfer operations, the facility should comply with 40 CFR 263 and 62-730.171, FAC.

## PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 02/19/2014

**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**

FDEP

**ORGANIZATION**

3/31/2014

**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.