



**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

July 23, 2014

Mr. Matt McClure, P.E.
JEA Westside Service Center
6727 Broadway Avenue
Jacksonville, Florida 32254
McMIMR@jea.com

**Re: JEA Westside Service Center
EPA/DEP ID: FLD 981 027 279
Duval County – Hazardous Waste**

Dear Mr. McClure:

The Department of Environmental Protection (DEP) personnel conducted a compliance inspection of the above-referenced facility on June 12, 2014. 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 email at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager

VC/jb/sb

Attachment



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

FACILITY INFORMATION:

Facility Name: JEA Westside Service Center

On-Site Inspection Start Date: 06/12/2014

On-Site Inspection End Date: 06/12/2014

ME ID#: 50530

EPA ID#: FLD981027279

Facility Street Address: 6727 Broadway Ave, Jacksonville, Florida 32254-2715

Contact Mailing Address: 21 W Church St, Jacksonville, Florida 32202-3155

County Name: Duval

Contact Phone: (904) 665-6253

NOTIFIED AS:

CESQG (<100 kg/month)

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

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Ron Yales, Transformer Shop Foreman

LATITUDE / LONGITUDE: Lat 30° 19' 57.7489" / Long 81° 45' 27.5675"

SIC CODE: 7629 - Services - electrical repair shops, nec

TYPE OF OWNERSHIP: Private

Introduction:

JEA Westside Service Center (JEA) was inspected on June 12, 2014, as an unannounced hazardous waste compliance inspection. The facility notified as a Used Oil Transporter and Used Oil Transfer facility and was registered in April of 2014. The facility has been assigned the EPA ID number FLD981027279. JEA was last inspected in June of 2010.

JEA operates a maintenance facility at this location for its electrical transformers. JEA is a municipal electric utility transporting only its own used oil, generated at its own noncontiguous facilities, to its own central collection facility, and is therefore exempt from the used oil certification program under Section 403.767(1)(c), Florida Statutes. Mr. Ron Yales, Transformer Shop Foreman, participated throughout the inspection.

Process Description:

Hazmat Building:

This building is where trucks triage the waste they accumulate in the field from different sites. Transformers are loaded onto the western side of the building where they are inspected (Photo 1). All transformers (good and bad) have a sample taken of the oil inside. If the sample comes back "hot" (PCB concentration of greater than 45 ppm) they are moved to the eastern side of the Hazmat building to be shipped off to TCI in Alabama (ALD983167891) as PCB contaminated waste, which is regulated under the Toxic Substance Control Act (TSCA). If the concentration is under 45 ppm, and the transformer is not going to be reused, the oil is kept inside the unit and shipped to TCI. If the transformer is able to be reused, and does not come back hot, it is taken to the Transformer Shop to be touched up, repainted, and put back into service.

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The facility also generates non-PCB used oil from various machines, which is brought back to the facility and stored in 55-gallon drums. These drums were properly labeled and in containment.

On the east side of the building the facility had an area to store universal waste lamps. On top and on the ground near a drum labeled "broken fluorescent bulbs" were pieces of broken fluorescent bulbs [40 CFR 273.13(d)(2)] (Photos 2-3). This drum was also open [40 CFR 273.13(d)(1)]. Also on the east side of the building is where the facility stores its hazardous waste and non-hazardous waste. The facility accumulates various items from substations and sites that are brought back to this location. Facility personnel then make a hazardous waste determination on these items. At the time of the inspection, no hazardous waste containers were on-site, but there were several items that were awaiting a hazardous waste determination.

Used Oil Tanks:

The facility has three used oil tanks located in the northwest corner of the Hazmat Building. Used oil with a PCB concentration of less than 45 ppm, and only from leaking transformers is transferred into these tanks. The transformers that are leaking are kept in tarps during transportation to the Hazmat Building. The tarp and transformer are set into large metal containment pans (Photo 4) to be staged while testing is performed. Once testing is performed the oil is either pumped into the tanks or containerized (if hot) in 55-gallon drums to be shipped of as a TSCA regulated waste.

Located outside of the Parts Storage Warehouse is a 5,200-gallon used oil tank (Photo 5). This tank is for when substations require oil to be removed and/or replaced. The oil is removed by a tanker truck and brought to this location to be stored before being shipped for recycling. This used oil tank was double walled and was properly labeled.

Transformer Shop:

Transformers that are going to be put back into service are brought to this area for minor repair and touch up work. Painting is performed in this area generating waste paint and mineral spirits. The facility uses green, yellow, gray, and black paints by Rus-Kil. According to the MSDSs, none of the paints contained heavy metals, but all had a flashpoint of below 140 degrees Fahrenheit. At the time of the inspection, the facility was allowing waste paint in three cans to evaporate. This is not ensuring proper disposal of a hazardous waste (Photos 6-7) [40 CFR 261.5(g)(3)]. The facility cleans its paint guns with mineral spirits. Waste from this process is managed as D001 hazardous waste and is accumulated in a 55-gallon drum (Photo 8). The facility generates approximately two gallons of waste mineral spirits per month. Rags used in this cleanup process with mineral spirits are accumulated in a step can. The facility also manages these rags as a D001 hazardous waste.

Glove Test Lab:

Gloves used by electricians have to be tested periodically to ensure they meet specifications. Once the gloves are tested, the date has to be written on them. Over time many of these date marks build up and need to be cleaned off. The facility uses a rag with Allied Quick Rubber Rejuvenator (30-40% toluene and 20-30% acetone and methanol) to remove old dates and put on new ones. These rags are a F005 hazardous waste when spent. The rags are added to the facility's paint waste rags. Since the facility disposes of the paint waste rags as D001 hazardous waste only, the facility did not make an adequate hazardous waste determination on this waste stream [40 CFR 262.11].

Records:

EWS Alabama (ALD981020894) and EQ of Florida (FLD981932494) dispose of the facility's hazardous waste. The last hazardous waste disposal was on 6/4/13 with a total volume of 1,130 pounds of hazardous waste. This included D001/F005 hazardous waste rags, waste paint, gasoline, and other flammable wastes from items the facility generates.

Lighting Resources in Ocala, Florida disposes of the facility's universal waste lamps.

The facility has the potential to be a Small Quantity Generator (SQG) of hazardous waste generator in any one month due to the episodic generation of waste. If the facility generates over 220 pounds of hazardous waste in any one month, the facility would be a SQG and all applicable 40 CFR

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262.34 accumulation requirements would apply.

New Potential Violations and Areas of Concern:**Violations**

Type: Violation
Rule: 261.5(g)(3)
Explanation: The facility was evaporating D001 hazardous waste paint.
Corrective Action: The facility corrected this during the inspection. No further action is necessary.

Type: Violation
Rule: 262.11
Explanation: The facility did not add the F005 code to its hazardous waste rags that contained toluene.
Corrective Action: The facility sent documentation to the DEP on 7.2.14, returning to compliance. No further action is necessary.

Type: Violation
Rule: 273.13(d)(1)
Explanation: The facility's crushed universal waste lamps were stored in a 55-gallon drum that was not closed.
Corrective Action: The facility sent documentation to the DEP on 6.13.14, returning to compliance. No further action is necessary.

Type: Violation
Rule: 273.13(d)(2)
Explanation: The facility did not clean up a spill of universal waste lamps on and around its 55-gallon drum.
Corrective Action: The facility sent documentation to the DEP on 6.13.14, returning to compliance. No further action is necessary.

PHOTO ATTACHMENTS:

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Photo 1 - west side of HazMat Building



Photo 2 - broken bulbs



Photo 3



Photo 4



Photo 5 - used oil tank



Photo 6



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Photo 7



Photo 8



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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

7/22/2014

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.