



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

FACILITY INFORMATION:

Facility Name: Tampa Transflo Terminal

On-Site Inspection Start Date: 07/07/2015

On-Site Inspection End Date: 07/07/2015

ME ID#: 37009

EPA ID#: FLR000105338

Facility Street Address: 504B N 34th St, Tampa, Florida 33605-6200

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

County Name: Hillsborough

Contact Phone: (904) 359-1323

NOTIFIED AS:

SQG (100-1000 kg/month)

Transporter

Transfer Facility

Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Kevin Roberts, Terminal Manager

LATITUDE / LONGITUDE: Lat 27° 57' 5.8056" / Long 82° 25' 21.1206"

SIC CODE: 4789 - Trans. & utilities - transportation services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Tampa Transflo Terminal is a rail to truck and truck to rail transfer facility for bulk commodities, including used oil and hazardous waste fuel. This inspection was conducted in conjunction with a NPDES storm water inspection, and a copy of that report is filed under the NPDES Facility ID, FLR05F806. The terminal consists of 10 rail sidings with a total capacity of 109 cars. On March 11, 2013, operation of the facility was transferred from Kinder Morgan to Arrow Material Services, and the new Terminal Manager, Kevin Roberts provided information during this inspection. The facility has about 14 employees, and operates five days per week, or on Saturdays if the customer arranges for it. CSX provides rail service to the terminal. The facility has been in operation since before the Legislature adopted restrictions on siting hazardous waste transfer facilities, and is not subject to that restriction.

Process Description:

The facility handles both liquid and solid materials, including hazardous waste fuel, used oil, sulfuric acid, fluosilicic acid, LP gas, hydrogen peroxide, toluene, cement, quicklime, alumina, fly ash, herbicide formulations containing Round-Up, magnesium hydroxide, limestone, perlite, plastic pellets used in injection molding and other bulk commodities. The facility only handles liquid hazardous waste at this time. In addition to the sidings, the property holds an office building, a small maintenance shed and truck scales located on the east side of the facility. Collected storm water is discharged from two outfalls, 001 on the east side and 002 on the south side of the facility. Water and sewer service is provided by the City of Tampa.

Used oil is transported to the facility by Safety-Kleen. At the time of this inspection, three rail cars had been delivered for loading. Track pans were placed under each car. Transfer of liquids is through equipment that is bolted to the tanker. Used oil is not held on site for more than 35 days.

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According to Mr. Roberts, Heritage Crystal Clean also transferred used oil into rail cars at this location in the past, however that activity ceased when Heritage acquired FCC Environmental Services in Plant City. At this time, Safety Kleen is transferring the oil to the company's East Chicago facility, IND077042034 for processing. The shipping documents for the material describe it as "Non DOT Regulated Material." Information will be requested from Safety Kleen regarding how the combustibility of the oil is determined, as the company is not a used oil processor and accepts oil that has been mixed with flammable liquids such as gasoline at times.

Hazardous waste fuel (commodity FIBK) is transported to the facility by Clean Harbors. Typically four tanker loads will fill a car, and only one car is loaded at a time. The loading is generally accomplished within a week, and waste never remains on site for ten days. A track pan provides containment. Manifests for the received waste were signed by Transflo staff. The current destination facility receiving the fuel is Ash Grove Cement Company in Chanute, KS, Facility ID KSD031203318.

Manifests from Clean Harbors were on file, indicating the CSX\Transflo was the second transporter. This line used the Transflo facility identification number, and CSX's transporter identification number was not included on the manifests. Instead, the manifests indicated a direct transfer to the Burlington Northern Santa Fe rail line (BNSF), MND048341788. CSX and Transflo are separate corporations, and should not have been designated as one entity on the manifests. If Transflo is accepting custody of the waste on behalf of CSX, then CSX should have been the designated second transporter. If CSX does not accept custody of the waste until it leaves the Transflo property, CSX must be listed as the third transporter. Transflo may still be authorized to sign the manifest on behalf of CSX. In a letter submitted after the inspection, Jan Barnes of Transflo indicated that staff would ensure that manifests would be checked to ensure that the CSX identification number is used in the future.

A separate issue was noted in that the designated facility does not clean residues out of all the rail cars. Residue of 2,597 gallons of waste in car UTLX 41234 was rejected from Ash Grove with a return manifest dated March 30, 2015. The car with residue was received at the Transflo Terminal on May 15, 2015. Four loads of waste were added to the car, before it left for Ash Grove again on May 20, 2015. Information was requested from CSX and Transflo regarding where this rail car was held between March 30 and May 15. Ms. Barnes' letter indicated that Transflo has not had custody of the car during that time. Because the car is leased to Clean Harbors, the Department has requested that Clean Harbors provide information on the movement of the car. Hazardous waste may not be stored at a transfer facility for more than 10 days.

Transflo's transporter registration and certificate of liability insurance is up to date, and the facility's used oil annual report was filed in February 2015. The facility closure plan is on file with the Department, and operations that would affect the plan have not changed since that time.

Used oil and a small quantity of waste alcohol is generated on site. The alcohol is used for filler cleaning, and was stored in a labeled satellite accumulation container under cover and on a secondary containment pallet. Used oil was also stored in labeled containers on containment pallets in the same area. A small double walled fuel tank for fueling two tractor and unloading equipment was also on site. No parts washers are on site.

Two high pressure sodium lighting fixtures were found behind the facility dumpster. One of these was opened, and it was confirmed that the lamp was still in place. Mr. Roberts said that the outdoor lighting had recently been replaced, and he was not aware that these lamps were on site. He said he would make arrangements for proper disposal. As the facility is conditionally exempt, and generates less than 10 lamps per month, this storage is not a violation, provided proper disposal is arranged.

The facility contingency plan was up to date, with the most recent revision on August 13, 2013 after Arrow Materials took over operation. Training was also up to date.

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

| | |
|--------------------|---|
| Type: | Violation |
| Rule: | 263.21(b) |
| Explanation: | Transflo failed to contact the hazardous waste generator and revise manifests according to the generator's instructions when transferring waste to a transporter that was not designated on the original manifest. Manifests did not include the EPA identification number of CSX Transportation. (Corrected) |
| Corrective Action: | Transflo must ensure that the next transporter's name and EPA identification number are on all manifests for waste that it has accepted for transfer. |

Conclusion:

Based on the results of this inspection, the Tampa Transflo Terminal was not in compliance with hazardous waste manifesting regulations. This was corrected after the inspection.

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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.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Consultant

PRINCIPAL INSPECTOR TITLE*E. Knauss***PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

7/7/2015

DATE**Supervisor:** Beth Knauss

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.