



## Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

August 5, 2015

Tampa Transflo Terminal  
504 N 34th.St.  
Tampa, FL 33605  
Attn: Mr. Kevin Roberts, Terminal Manager  
[vroberts@arrowmaterials.com](mailto:vroberts@arrowmaterials.com)

Re: NPDES Facility ID No. FLR05F806  
Hazardous Waste Facility ID No. FLR0001053381  
Hillsborough County

Dear Mr. Roberts,

Department personnel conducted a compliance inspection of the above-referenced facility on July 7, 2015. Based on the information provided during the inspection, the facility was determined to be in compliance with hazardous waste and NPDES storm water regulations. Copies of the inspection reports are 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 Elizabeth Knauss at (813) 470-5902 or via e-mail at [Elizabeth.Knauss@dep.state.fl.us](mailto:Elizabeth.Knauss@dep.state.fl.us).

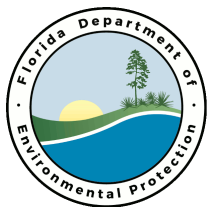
Sincerely,

A blue ink signature of Richard Vaughn, written in a cursive style.

Richard Vaughn  
Environmental Manager  
Compliance Assurance Program  
Southwest District

Enclosures: Inspection Report

ec: Jan Barnes, Director, HSEQ ([jbarnes@transflo.net](mailto:jbarnes@transflo.net))  
Gerry Javier, HEPC ([javier@epchc.org](mailto:javier@epchc.org))  
Ramandeep Kaur, FDEP Compliance Assurance Section  
Richard Vaughn, FDEP Compliance Assurance Section



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

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**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.

Inspection Date: 07/07/2015

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.

Inspection Date: 07/07/2015

**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.

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**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.

Inspection Date: 07/07/2015

**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**

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.



# Department of Environmental Protection Industrial Stormwater Inspection Report



Facility and Inspection Information		populate pre-inspection	
Physical Location: Tampa Transflo Terminal 504 N 34th St Tampa, FL 33605-6200		Permit No.: FLR05F806 Effective Date: Sep 6, 2013 Expiration Date: Sep 5, 2018	Inspection Date: Jul 7, 2015 Entry Time: 10:30 AM Exit Time: 12:30 PM
Mailing Address: Transflo Terminal Services Inc 500 Water St, J975 Jacksonville, FL 32202-4423		Water Management District: SWFWMD County: Hillsborough	Hydrologic Conditions: Normal Latitude: 27 ° 57 ' 4.6822 " Longitude: 82 ° 25 ' 23.843 "
Receiving Waters/MS4: Outfall to MCKAY BAY OFW: No Class I or II: No Other: N/A		No. of Employees: 14 No. of Shifts: 1 Hours of Operation: 6 to 6 5 d/week	Size of Property (acres): 11.00 Years at Location: 25
<b>Industrial Activity</b>			
SIC Code(s): 4013	Sector: p	Industrial Activity: Land Transportation	
<b>Company Representatives</b>			
<u>On-Site Representative(s)</u> Kevin Roberts	<u>Title</u> Terminal Manager	<u>Company/Organization</u> Arrow Material Services	<u>Telephone</u> (813) 247-7675
<u>Responsible Corporate Official</u> Rebecca Heilman	<u>Title</u>	<u>Company/Organization</u> Transflo Terminal Services Inc	<u>Telephone</u> (904) 359-1337
Email Address to Send Report:		KRoberts@ArrowMateriaServices.com	
<b>Inspection Comments</b>			
The Tampa Transflo Terminal is a rail-to truck and truck-to rail bulk intermodal transfer facility. Tankers transfer their loads to tanker cars, and bulk commodities are unloaded from rail cars for transport by truck. 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, herbicide formulations containing Round-Up, magnesium hydroxide, limestone, perlite and plastic pellets used in injection molding. The facility consists of 9 active rail sidings having a capacity of 109 cars. In addition, an office building, a small maintenance shed and truck scales are 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.			
<b>Weather Conditions</b>			
Possible rain events in the past 24 hours.			
<b>Summary Evaluation</b>			
Element Rating:		S=Satisfactory=In-Compliance M=Marginal=Non-Compliance U=Unsatisfactory=Significant Non-Compliance N=Not Evaluated N/A=Not Applicable N/C=Not Covered	
S	Permit		
S	Condition of Receiving Waters		
S	Facility Site Review/Operation and Maintenance		
S	Plans/Monitoring		
<b>Inspector Information</b>			
Inspector Name	Firm or Agency - Office	Telephone	
Elizabeth Knauss	FDEP - SWD	(813) 470-5902	



# Department of Environmental Protection Industrial Stormwater Inspection Report



## Permit

Is coverage under a Multi-Sector Generic Permit (MSGP) required?	Yes
If "No," why not?	Not Applicable
If "Yes," has an MSGP been applied for?	Yes
If "Yes," is the permit Active?	Yes
If "No," why not?	Not Applicable
<b>Rating:</b> This item is rated as 'Satisfactory'.	

## Condition of Receiving Waters

Is a stormwater discharge apparent at the time of the inspection?	No
Is there evidence that there has been a discharge of polluted runoff to a regulated receiving water (past or present)?	No
<b>If so, what is the apparent impact?</b>  Not Applicable	
<b>Rating:</b> This item is rated as 'Satisfactory'.	

## Facility Site Review

Have the provisions of the SWPPP been implemented?	All
If 'Some' or 'None', is there a potential for the discharge of polluted stormwater from the site to a regulated receiving water/MS4?	Not Applicable
<b>Explain what has not been implemented:</b>  Not Applicable	
Are Best Management Practices (BMPs) contained in the SWPPP appropriate for the activities occurring on-site to protect regulated surface waters from the discharge of polluted stormwater runoff?	Yes



# Department of Environmental Protection Industrial Stormwater Inspection Report



## Best Management Practices (BMPs)

Areas of Concern	Are BMPs currently employed at the facility?	Are the BMPs maintained consistently with the SWPPP?	Do the BMPs appear to be sufficient to protect surface waters?
Vehicle Wash and Rinse Area	No vehicle wash areas on site	Not Applicable	Not Applicable
Fueling Stations	Small double walled fuel tank for fueling tractor and unloading equipment	Yes	Yes
Vehicle Maintenance	Only transfer equipment is maintained, most activities appear to be under cover	Yes	Yes
Outdoor Manufacturing Areas	No manufacturing on site	Not Applicable	Not Applicable
Outdoor Stockpile/Material Handling Areas	No stockpiles, material handling is under cover or by closed connection except in an area for magnesium hydroxide slurry loading. Trays are used under transfer lines, but some spillage was noted. pH of contact water was neutral.	Yes	Yes
Trash and Debris Areas	One dumpster with lid, some pallets and scrap metal adjacent including two outdoor light fixtures still containing HID lamps	No	Yes
Loading/Unloading Transfer Areas	Track pans available. Transfer of liquids is through equipment that is bolted to the tanker. Some solids unloading is under cover. Solids loading can be from pneumatic equipment. Storm water flows into grated sumps and is directed to retention ponds. Overflow is discharged through pipes to either outfall 001 or 002. Valves are present and be closed to prevent a discharge	Yes	Yes
Illicit Connections to SW system (e.g., floor drains)	None observed	Yes	Yes
Chemical Storage Tanks (New and Used fluids)	2 13,000 gallon magnesium hydroxide slurry tanks, appeared to be some dust releases, not reaching storm water ponds. Better cleanup recommended	No	Yes
Stormwater Treatment System	Two separate retention areas receiving water from drainage pipes equipped with shutoff valves to be used in the event of a spill. Outfall 002 is from an area handling mostly non hazardous solids, and leads directly to a ditch running south of the fence line. The northern part of the site drains to a pond, and then through a pipe running to a control structure with the final outfall discharging to a ditch that runs to the east under 34th St.	Yes	Yes
<b>Rating:</b> This item is rated as 'Satisfactory'.			

## Plans/Monitoring - SWPPP

Has a SWPPP been prepared for the facility?	Yes
Is the SWPPP available for review at the time of the inspection?	Yes
Does the SWPPP appear accurate and up-to-date?	Yes
Does the SWPPP appear to meet the standards set forth in the MSGP (see the SWPPP Checklist for all applicable areas)?	Yes
Are applicable records kept for three years from the date of collection?	Yes





# Department of Environmental Protection Industrial Stormwater Inspection Report



## Plans/Monitoring - Analytical Monitoring

Is the facility subject to analytical monitoring requirements?	No
If so, have the following conditions been met?	
- Identified schedule for monitoring?	Not Applicable
- Has sampling been performed in years 2 and 4?	Not Applicable
- Have DMRs been completed for sampling?	Not Applicable
- Have DMRs been submitted to DEP?	Not Applicable

## Plans/Monitoring - Compliance Monitoring

Is the facility subject to compliance monitoring requirements?	No
If so, have the following conditions been met?	
- Are discharges sampled annually and tested for the parameters that are limited by the permit?	Not Applicable
- Are samples from the discharges subject to the numeric effluent limitations prior to mixing with other discharges?	Not Applicable
- Is the facility meeting numeric effluent limitations?	Not Applicable
- Are DMRs for compliance monitoring results submitted to the Department by the last day of the month following the anniversary month of the effective date of the permit? (e.g., If permit coverage was received in March 2006, DMRs are due by March 31, 2007)	Not Applicable

## Plans/Monitoring - Annual Comprehensive Site Compliance Evaluation

Has the facility performed the Annual Comprehensive Site Compliance Evaluation?	Yes
Does the report contain the following:	
- The scope of the evaluation?	Yes
- The date?	Yes
- Any major observations relating to the implementation of the SWPPP?	Yes
Have the following conditions been met?	
- Has a determination of the effectiveness of the plan been made?	Yes
- Has an assessment of compliance with the terms of the permit been prepared?	Yes
- Has a report documenting the results of the evaluation been prepared?	Yes
- Have the results been maintained for three (3) years?	Yes

## Plans/Monitoring - Quarterly Visual Monitoring

Has the facility performed quarterly visual examinations of stormwater? (Note: Does not apply to Sector S)	Yes
If so, have the following conditions been met?	
- Identified schedule for monitoring?	Yes
- Are records maintained?	Yes
- Do the reports include observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, or other obvious indicators of stormwater pollution?	Yes

**Rating:** This item is rated as 'Satisfactory'.



# Department of Environmental Protection Industrial Stormwater Inspection Report



Industrial SWPPP Checklist		
	Yes/No	Comments
Is SWPPP Current and up-to-date?	Yes	Most recent Revision 7/16/13. Arrow Materials assumed responsibility for operating the terminal on 3/11/13
Pollution Prevention Team	Yes	
Description of Potential Pollutant Sources	Yes	
Drainage	Yes	basins, flow patterns and outfalls located on aerial
Inventory of Exposed Materials	Yes	
Significant Spills and Leaks	Yes	None reported
Non-Stormwater Discharges	Yes	None reported
Sampling Data	N/A	
Summary of Potential Pollutant Sources	Yes	
Measures and Controls	Yes	
Good Housekeeping	Yes	
Preventative Maintenance	Yes	
Spill Prevention and Response	Yes	
Inspections	Yes	Quarterly inspection records maintained, cover all required areas
Employee Training	Yes	annual, most recent 6/30/14
Record Keeping	Yes	
Sediment and Erosion Control	N/A	
Management of Runoff	Yes	
Annual Comprehensive Site Compliance Evaluation	Yes	most recent 3/30/15



# Department of Environmental Protection Industrial Stormwater Inspection Report



## Inspector Comments

Rationale for Letter:

In compliance letter recommended

Other Comments:

## CEM Comments

Concur with Recommendation?

☒ Yes

☐ No

Comments:

Reviewer: Ramandeep Kaur, Environmental Manager

Directed Action:

CEM Signature:

*Ramandeep Kaur*



# Department of Environmental Protection Industrial Stormwater Inspection Report

## Inspection Photo Log

Photo 1:



Inspector Comments: Used Oil Tank Car with Track Pan

Photo 2:



Inspector Comments: Magnesium Hydroxide Slurry mixing



# Department of Environmental Protection Industrial Stormwater Inspection Report



## Inspection Photo Log

Photo 3:



Inspector Comments: Catch Basin in paved area

Photo 4:



Inspector Comments: North pond and hopper car unloading area.





# Department of Environmental Protection Industrial Stormwater Inspection Report

## Inspection Photo Log

Photo 5:



Inspector Comments: Influent pipe with gate valve - north pond

Photo 6:



Inspector Comments: Outfall pipe from north pond



# Department of Environmental Protection Industrial Stormwater Inspection Report



## Inspection Photo Log

Photo 7:



Inspector Comments: Looking south from the north side of the northern retention pond. A valve from a drain is visible in the center of the photo.

Photo 8:



Inspector Comments: Outfall 001 - bottom of basin was clearly visible, fish were swimming in the water





# Department of Environmental Protection Industrial Stormwater Inspection Report

## Inspection Photo Log

Photo 9:



Inspector Comments: Sheet Flow from siding to south ditch. Granite ballast is clean and free from dust. Unloading hatches closed and secured with seals.

Photo 10:



Inspector Comments: Outfall 002 into the south ditch from the south retention area. Ditch has a large amount of duckweed, but where visible, the water was clear.