Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Liquid Environmental Solutions of Florida LLC

On-Site Inspection Start Date: 10/14/2014 **On-Site Inspection End Date:** 10/14/2014

ME ID#: 33798 **EPA ID#:** FLD981928484

Facility Street Address: 1640 Talleyrand Ave, Jacksonville, Florida 32206-5436

Contact Mailing Address: 1640 Talleyrand Ave, Jacksonville, Florida 32206-5485

County Name: Duval **Contact Phone:**

NOTIFIED AS:

CESQG (<100 kg/month)
Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Yuri Turovsky, Plant Manager

LATITUDE / LONGITUDE: Lat 30° 20' 36.3664" / Long 81° 37' 44.8878"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

Liquid Environmental Solutions of Florida, LLC (LES) was inspected on October 14, 2014, as an unannounced hazardous waste compliance inspection. At the time of the inspection, the facility was operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. The facility has been assigned the EPA ID number FLD981928484. Please use this number on all hazardous waste manifests and on future correspondence with the Department's Hazardous Waste Section. Mr. Yuri Turovsky, General Manager, participated in the inspection.

LES is an industrial wastewater pre-treatment facility, a used oil processor, a used oil transporter, and a petroleum contact water (PCW) recovery facility. The facility consists of a main office; a laboratory; a maintenance shop; a container storage area; the processing, treatment, and recovery areas; and a solids, sludges, and residues management area.

Process Description:

The facility treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. Incoming wastewater is treated by gravity separation and/or by dissolved air flotation (DAF). It is then chemically treated to adjust the pH in order to induce coagulation and flocculation. Treated wastewater is discharged to the local POTW (JEA-Buckman Wastewater Plant). Stormwater is collected in a sump on the southeast corner of the facility. The stormwater is typically sent through an oil/water separator to tank 6, then to the DAF unit on-site.

According to Mr. Turovsky, roughly 10% of all incoming shipments are used oil. These shipments

of used oil are sampled for TOH and flashpoint. After passing the analyses, the used oil is off-loaded into specified used oil tanks. The used oil is then de-watered using gravity, heat, and/or de-emulsifing chemicals. After treatment, the oil is directed to different used oil tanks to cool down and then, if no other processing is necessary, the oil is directed to tanks for shipment off-site. The wastewater fraction receives further treatment and processing, and it is then discharged to the POTW. All of the facility's used oil processing tanks were properly labeled.

Samples are also taken of incoming shipments of oily wastewater. According to Mr. Turovsky, TOH is run on all shipments of oily wastewater that have a definable amount of used oil. After passing the analysis, oily wastewater is off-loaded into tanks 1 and 2 for gravity separation. The free oil is then transferred to the oil processing tanks for further treatment, and discharge to the POTW.

PCW is sampled and tested for flashpoint, and after passing the analysis, the PCW is off-loaded into tanks 81 and 82. The PCW is treated via gravity separation, and the recovered product volume is measured for reporting purposes. The fuel is then transferred to the oil processing tanks. At the time of the inspection, both PCW tanks were properly labeled.

The solids/sludges/residues generated from the facility's activities are de-watered, loaded into roll-off containers, and then disposed at Camden County Landfill. LES generates 10 to 15 roll-offs of the solids/sludges/residues per month. According to Mr. Turovsky, the facility cleans out the used oil processing tanks once per year, which generates between 100 to 200 gallons of oily sludge per tank cleaned. The tank cleanout sludge is then placed into a roll-off with the other solids/sludges/residues generated at the facility. LES performs two analytical tests per quarter on random roll-offs containing the solids/sludges/residues. Analytical results consistently show the waste to be non-hazardous.

Laboratory:
The laboratory facility generates small amounts of waste solvents from Chlor-d-tect and Chemical Oxygen Demand (C.O.D.) analysis procedures. LES has characterized the Chlor-d-tect test waste as a D001/D006 hazardous waste. The C.O.D. test generates a D002/D007/D009 waste solvent. These two waste streams are collected in separate satellite containers located directly outside the labs where they are generated. EcoFlo last disposed of 55 gallons of lab waste on 9-16-13.

Also located in the lab is the facility's universal waste lamp storage area. This area was moved since the last inspection. The facility stores its spent universal waste lamps in a closed wooden box that is properly labeled (Photo 1).

Maintenance Shop:
The maintenance shop is used for repairing items such as pumps and valves. No hazardous waste or used oil is generated in this area. Since the last inspection, this area was moved from the western portion of the facility to the northeast portion of the facility. Since the maintenance area was moved, there is a portion of the containment wall near the used oil loading and unloading area that is missing (Photo 2-4). The concrete is sloped to ensure that spills and any stormwater is routed to the facility's containment area, but additional containment is recommended. This is an area of concern. Photo 4 also shows a storage tank for spent restaurant grease. This grease is not processed on-site.

Container Storage Area:
The container storage area is used for non-hazardous waste brought into the facility. Used oil drums are also brought to this area for storage until they can be pumped into the processing tanks. Next to this area was a 5-gallon bucket full of used oil that was not properly labeled [40 CFR 279.22(c)(1)].

Transportation Operations:
The facility is also a registered and certified used oil transporter. According to Mr. Turovsky, LES mainly accepts shipments from third party carriers; however, occasionally used oil transportation is performed by LES. Its current used oil registration was on display during the inspection.

The facility is a registered used oil filter processor; however, the facility does not process the used

oil filters it receives. The filters come in drums, and any free oil inside the drum is pumped out and processed. The drums are then placed into a separate storage area until they can be picked up for disposal at EcoFlo Southeast in Georgia. The drums are kept closed and on an oil-impermeable surface in the drum storage area.

Mr. Turovsky stated that when a new customer is serviced by LES, a process description and a sample of the customer's used oil is collected as part of the waste profile evaluation and approval process. The sample is analyzed for TOH prior to the first pickup, and the profile is re-certified annually. After the used oil passes the original test, LES does not perform TOH tests on each individual pickup from the customer, but the facility requires a statement from the generator before accepting every load for transportation, certifying that its used oil does not contain greater than 1000 ppm halogens.

Acceptance/Delivery Record Review:
Section 62-710.510, FAC, requires that all registered facilities, including used oil processors, maintain records that include the type code designation and the end use code designation of used oil handled by the facility. These two codes were not found on the facility's delivery records, but are being kept on the computer system and were available for review for any shipment handled by LES. The delivery record dated 9.30.14 (OPL# 5501257) did not have the transporters EPA ID number as required by 40 279.56(b)(3). LES has submitted its annual report describing the amount of product PCW recovered at the facility as required. Reports summarizing used oil processing activities are submitted annually as required.

Other Record Review:
Personnel training was up to date and the facility was maintaining inspection logs as required. The facility's Contingency Plan and SPCC Plan were available for review and in order. The latest version of the Contingency Plan has been sent to local authorities. A copy of the permit and permit application were on-site and available for review.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1)
Explanation:	The facility failed to label a 5-gallon bucket of used oil.
Corrective Action:	This container was labeled during the inspection. No further action is necessary. Please note repeat violations, if cited in future inspections, may trigger formal enforcement.

Type:	Violation
Rule:	279.56(b)(3)
Explanation:	The facility did not include the EPA ID number of the transporter in its delivery records.
Corrective Action:	The facility submitted documentation to the DEP on 10.21.14, returning to compliance. No further action is necessary.

PHOTO ATTACHMENTS:

Photo 1 - UW lamp container

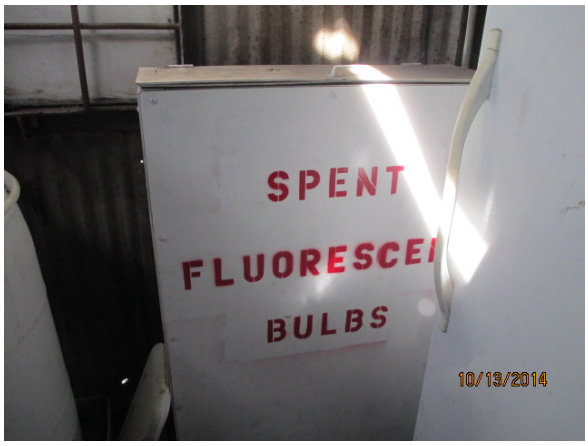

Photo 2 - old maintenance area

Photo 3

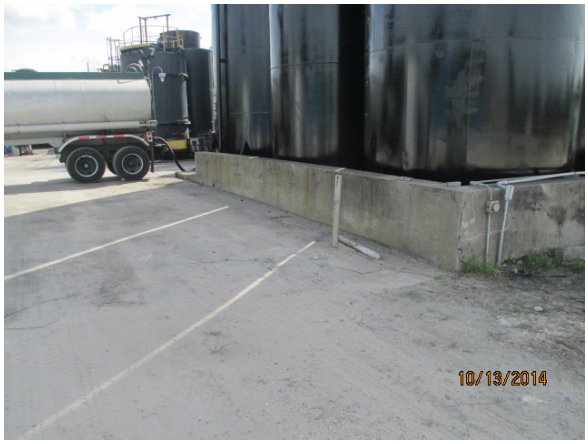

Photo 4 - old maintenance area with grease tank

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	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	11/4/2014
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Supervisor: **Jabe Breland III** **Inspection Approval Date:** 08/28/2015

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.