



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

FACILITY INFORMATION:

Facility Name: Dana Transport Inc

On-Site Inspection Start Date: 09/01/2015 **On-Site Inspection End Date:** 09/01/2015

ME ID#: 56688 **EPA ID#:** FLR000035873

Facility Street Address: 2700 Buckman St, Jacksonville, Florida 32206-3368

Contact Mailing Address: 2700 Buckman Street, Jacksonville, Florida 32206

County Name: Duval **Contact Phone:** (904) 634-1999

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Heather M. Hahn, Inspector

Other Participants: Sherrill Williams, Site Manager

LATITUDE / LONGITUDE: Lat 30° 21' 18.8246" / Long 81° 37' 59.36"

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

TYPE OF OWNERSHIP: Private

Introduction:

Dana Transport Inc (Dana) was inspected on September 1, 2015, as an unannounced hazardous waste compliance inspection. At the time of the inspection, it was operating as a hazardous waste transporter and transfer facility. The facility was previously inspected by the Department's Hazardous Waste Program on September 11, 2012.

Dana has been assigned the EPA ID number FLR 000 035 873. Please use this number on all hazardous waste manifests and on future correspondence with the Department.

Process Description:

Dana is a hazardous waste transporter located in Jacksonville, Florida. The facility's drivers pick up incoming shipments of hazardous waste that originate in Puerto Rico and arrive at the port via Crowley Liners. The facility operates as a hazardous waste transfer facility because it may store its vehicles containing hazardous waste on-site longer than 24 hours but less than 10 days. According to Sherrill Williams, Site Manager, if drivers park at Dana's location, it is usually not longer than 24 hours. More than 90% of the company's waste is transported to Philip Reclamation Service (TXD 074 196 338).

The facility consists of an office, a yard for vehicle parking and to store containers. There were several empty containers on-site that are for emergency use, or waiting to be tested for structural integrity. The facility has a concrete pad to store hazardous waste vehicles when it is operating as a transfer facility. At the time of the inspection, two tankers were located on the concrete pad. According to the facility's paperwork, both tankers contained non-hazardous product. The facility should inspect the pad for any cracks or structural defects regularly.

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Dana purchased a company called Suttles Truck Leasing (ALD095704011), which is also a registered transporter in the State of Florida. The Suttles Truck Leasing ID number is used on manifests. Dana maintains a log of hazardous waste vehicles that enter the property, the date the vehicle is on-site, and the date the vehicle leaves the site. The log was on-site and available for review at the time of the inspection.

Dana has spill kits and clean-up material in the event of a spill. The facility did not have an eye wash station at the time of the initial inspection. Since the facility is transporting ignitable waste this was an area of concern. As of a November 11, 2015, site visit, the facility had installed an eye wash station.

Records:

The facility only had three months of shipping paper records on-site at the time of the inspection [40 CFR 263.20(h)(4)]. The facility stated during the inspection that it will maintain its records on-site for a minimum of three years. During a November 11, 2015 follow-up site visit the facility had located files from mid 2014 and is currently maintaining all files on-site. Manifests that were reviewed were found to be in order. The facility's liability insurance is up to date. The facility keeps its hazardous waste transporter registration in a folder at the facility along with an emergency contact list, and it places this folder in its mail box after hours when personnel are not present. The Site Manager, Sherrill Williams, could not find documentation of hazardous waste training at the time of the inspection, but this documentation was provided to the inspector during a November 11, 2015, site visit. The facility is reminded that annual hazardous waste training is required per 40 CFR 265.16 and this documentation should be kept on-site.

New Potential Violations and Areas of Concern:

Violations

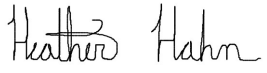
Type:	Violation
Rule:	263.20(h)(4)
Explanation:	The facility only had copies of shipping papers for three months and did not maintain copies of SQG and LQG shipping papers for three years.
Corrective Action:	No further action is required. The facility stated that it would begin maintaining records for a minimum of three years and during a November 11, 2015, site visit, the facility had manifests from mid 2014 through 2015 on-site and available for review.

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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.

<u>Heather M. Hahn</u>	<u>Inspector</u>
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE
<u></u>	
PRINCIPAL INSPECTOR SIGNATURE	<u>FDEP</u> <u>11/17/2015</u>
	ORGANIZATION DATE

Supervisor: Pam Fellabaum **Inspection Approval Date:** 11/17/2015

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.