



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

FACILITY INFORMATION:

Facility Name: Heritage-Crystal Clean LLC

On-Site Inspection Start Date: 02/25/2016

On-Site Inspection End Date: 02/25/2016

ME ID#: 95762

EPA ID#: FLR000170431

Facility Street Address: 9940 Currie Davis Dr #A44, Tampa, Florida 33619-2669

Contact Mailing Address: 2175 Point Blvd Ste 375, Elgin, Illinois 60123-9211

County Name: Hillsborough

Contact Phone:

NOTIFIED AS:

Non-Handler

Transporter

Transfer Facility

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Used Oil facility

Routine Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Adam C. Mefferd, Branch Manager

LATITUDE / LONGITUDE: Lat 27° 57' 4.3165" / Long 82° 20' 27.7981"

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

TYPE OF OWNERSHIP: Private

Introduction:

Heritage-Crystal Clean, LLC, (Crystal Clean) was inspected to determine the facility's compliance with state and federal hazardous waste regulations. The facility is notified/registered as a non-handler of hazardous waste, a UW lamp and device transfer facility, a HW transporter, a HW transfer facility, a used oil transporter, a used oil transfer facility, a used oil filter transporter, and a used oil filter transfer facility. The most recent notification was received in May 2015. Crystal Clean at this location was inspected by the Department's Hazardous Waste Section on 06-02-11, and it was also inspected several times at its previous location under EPA ID #FLR000092171. The inspector was accompanied throughout the inspection by Mr. Adam Mefferd, Branch Manager.

Process Description:

Crystal Clean primarily manages drummed waste and also supplies and services parts washers for customers in the region. The facility consists of an office, warehouse, three trailers, and five box trucks, one of which is a spare. There are five drivers. All hazardous waste is transported by Crystal Clean's location in Elgin, IL, under EPA ID #ILR000130062. Vehicles are maintained by Rush Truck in Tampa, and the trailers, which are leased, are maintained by the vendor in Atlanta if necessary. Limited maintenance on customers' equipment may be done here, but it is returned to the manufacturer for refurbishing if major repairs are needed.

Outbound wastes are stored in the trailers. Inbound waste is transferred directly from the

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route/box truck to one of the trailers. Waste containers are moved from vehicle to vehicle only and are never stored inside the building. The outbound shipments alternate between two shipments one week followed by three shipments the following week, for a total of five shipments every two weeks. Used oil is now managed at the Plant City location, which is also a permitted used oil processing facility. There were no universal waste lamps observed at the facility.

"Danger - Do Not Enter" and "No Smoking" signs are placed in appropriate locations around the facility. Security cameras are present. In the facility, an emergency contact list is posted, as were the used oil and hazardous waste transporter registrations. The required closure plan and operating procedures were previously submitted to the Department on 08-23-10. A review of the facility's training, financial responsibility, current inbound and outbound manifests/receipts, inspections and the contingency plan were conducted during the inspection and found to be satisfactory. Training includes RCRA management, HazWOPER, and HazComm annually, plus DOT Safety Training every three years. The designated emergency coordinator is Mr. Mefferd, and Mr. Toby Collard is the alternate.

Inbound containers are tracked using a computerized barcoding system, which can also generate a daily inventory log. For outbound containers, the same system generates a bill of lading which accompanies the rest of the disposal documents to the final destination. This facility maintains digital inbound/outbound logs for waste that has already left the facility, and maintains paper copies of manifests and logs while the waste is still on site. Records are officially maintained at Crystal Clean's corporate offices in Elgin. Mr. Mefferd stated that generators claiming to be conditionally exempt are verified using the Department's Handler Search web page before the waste is accepted.

At the time of the inspection, the facility had two trailers of outbound waste. One of the trailers was randomly selected for inspection. The trailer was scheduled to leave the site later in the day. The wastes inside this trailer were easily cross-referenced to inbound logs and associated disposal paperwork. The oldest container in the shipment was dated 02-23-16. The cab of one of the company's route vehicles was randomly inspected and contained the required documents, including copies of registrations, proof of insurance, spill response plans, etc. Emergency and safety equipment were also available.

Inside the building, the facility primarily stores materials to be sold to customers. There are new and used parts washers of various types and sizes, and at the time of inspection, there were approximately 150 x 30-gallon containers and 50 x 16-gallon containers of fresh solvent. There are also gun washers, new antifreeze containers, containerized soaps, empty overpack containers, spill response equipment, and numerous empty containers. There are also three totes of concentrated soaps plus another tote containing water for dilution. The soaps are sold to customers in drums that are filled on site by Crystal Clean.

One of the three trailers is used to store materials, primarily product, that Crystal Clean prefers to have outside the building. It may also be used to store waste if needed. At the time of the inspection, there were only a few product containers inside.

The only 'wastes' stored inside the facility are used oil filters on their way to the Crystal Clean facility in Plant City, FL, and those remain on site for only a day or so. The area inside the building that is designated as the used oil filter transfer facility contained seven 55-gallon drums and one 35-gallon container of used oil filters awaiting transport to the Plant City location. All the containers were being managed properly.

Conclusion:

Based on the observations made during this inspection, Crystal Clean was found to be in compliance with rules applicable to hazardous waste transporters, transfer facilities.

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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.

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

5/4/2016

DATE**Supervisor:** Richard Vaughn

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.