

# Florida Department of

#### **Environmental Protection**

## **Hazardous Waste Inspection Report**

### **FACILITY INFORMATION:**

Facility Name: Marine Industrial Services Inc

On-Site Inspection Start Date: 02/23/2016 On-Site Inspection End Date: 02/23/2016

**ME ID#**: 52185 **EPA ID#**: FLD032383945

Facility Street Address: 709 Talleyrand Ave Ste 3, Jacksonville, Florida 32202-1042

Contact Mailing Address: PO Box 43175, Jacksonville, Florida 32203-3175

County Name: Duval Contact Phone: (904) 350-0006

**NOTIFIED AS:** 

CESQG (<100 kg/month)

Used Oil

### **INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility

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

#### **INSPECTION PARTICIPANTS:**

Principal Inspector: Heather M. Hahn, Inspector

Other Participants: Pam Fellabaum, Inspector; Thomas Sween, President

**LATITUDE / LONGITUDE:** Lat 30° 19' 44.6989" / Long 81° 37' 50.2162"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

### Introduction:

Marine Industrial Services Inc (MIS) was inspected on February 23, 2016, as an unannounced hazardous waste compliance inspection. MIS was last inspected on September 11, 2012, when it was operating as a used oil, used oil filter, and PCW transporter. MIS was currently operating as a used oil transporter, a used oil filter transporter, and a PCW transporter.

MIS offers the following services: industrial tank cleaning, wastewater management, vacuum truck services, and hydro-blasting. The facility consists of offices and a maintenance shop. General maintenance of fleet vehicles is performed on-site. Mr. Thomas Sween, President, was present throughout the inspection.

# **Process Description:**

**Used Oil Transportation:** 

Industrial tank cleaning involves hosing down empty tanks with soap and water, and the non-hazardous oily wastewater or PCW is taken to Liquid Environmental Solutions (LES) for disposal. According to Mr. Sween, sometimes it is necessary to pump out used oil from a tank prior to cleaning. This used oil is then taken directly to LES. If LES is not open, the tanker will return to MIS until LES re-opens. When LES is not available, MIS will transport used oil and oily wastewater to Water Recovery LLC.

Used oil filters transported by MIS are also taken to LES.

Maintenance Shop:

Inspection Date: 02/23/2016

General automotive maintenance is performed in this area, including oil and oil filter changes. The facility has four vacuum trucks, one tractor tanker, one box truck, and one flat bed truck. According to Mr. Sween, non-hazardous rags and absorbents are taken to LES for disposal, and waste batteries are disposed of through Napa.

The facility uses 3M High Power Brake Cleaner containing 30-60% hydrotreated light naptha, 10-30% xylene, 10-30% propane, and 7-13% methyl alcohol with a flash point of -50 degrees Fahrenheit. This brake cleaner would be non-hazardous on a rag. Waste aerosol cans are used until completely empty prior to being disposed of as solid waste.

There is one parts washer in this area, which uses diesel fuel as solvent. The spent diesel fuel from this machine is added to the facility's used oil.

There was one 55-gallon drum for used oil filters and one drum for used oil generated from the facility's maintenance operations. All of these drums were properly labeled. While the drums were located inside the shop, the building was not completely sealed in a way that would contain used oil. The facility's used oil drum should have secondary containment [62-710.401(6), FAC]. Per a May 5, 2016, e-mail, the facility's used oil container is within secondary containment. The facility also had several 5-gallon buckets used to accumulate used oil from the shop. At the time of the inspection, all of these containers were empty. The facility is reminded that all used oil containers, including drip pans, buckets, and other transfer containers, should be labeled with the words "Used Oil" when they contain used oil.

#### Record Review:

Used oil, used oil filter, and PCW transportation records were reviewed during the inspection. Halogen screening results were being recorded on the manifest, and the facility was marking the type code and end use code on its transportation log.

The facility's used oil training program appeared to be in order, and the required insurance was up to date. The used oil and used oil filter transportation registration from the DEP was on display at the facility as required. MIS submitted its annual report by March 1 as required.

MIS is currently operating as a used oil, used oil filter, and PCW transporter. The facility has been assigned the EPA ID number FLD032383945. Please use this number on all transportation records and on all correspondence with the DEP.

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

### **Violations**

Type: Violation

Rule: 62-710.401(6)

Explanation: One 55-gallon drum of used oil did not have adequate secondary containment.

Corrective Action: No further action is required. In a May 5, 2016, e-mail, the facility provided

documentation that it's used oil container is within secondary containment.

### **Photo Attachments:**

Inspection Date: 02/23/2016

# Used oil with inadequate secondary containment



Inspection Date: 02/23/2016

# 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.

Heather M. Hahn	Inspector PRINCIPAL INSPECTOR TITLE	
PRINCIPAL INSPECTOR NAME  Heather Hahn  PRINCIPAL INSPECTOR SIGNATURE		
	FDEP ORGANIZATION	5/6/2016 <b>DATE</b>
NOTE: By signing this document, the Site Rep Report and is not admitting to the accuracy of	·	•

Violations" or areas of concern.