



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

FACILITY INFORMATION:

Facility Name: Clark Environmental

On-Site Inspection Start Date: 06/03/2016

On-Site Inspection End Date: 06/03/2016

ME ID#: 2775

EPA ID#: FLD984206003

Facility Street Address: 755 Prairie Industrial Pkwy, Mulberry, Florida 33860-6559

Contact Mailing Address: 755 Prairie Industrial Pkwy, Mulberry, Florida 33860-6559

County Name: Polk

Contact Phone: (863) 425-4884

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Leslie Pedigo, Environmental Specialist III; Mark Alessandroni, PE, CHMM, General Manager

LATITUDE / LONGITUDE: Lat 27° 54' 9.4679" / Long 81° 59' 35.3215"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Clark Environmental, Inc., (Clark) was inspected to determine its compliance with state and federal hazardous and universal waste transporter requirements. The facility most recently notified the Department of Environmental Protection (Department) of its waste activities in May of 2016 as part of the annual transporter renewal process. The facility has two Solid Waste permits; one to operate a Materials Processing Facility (38627-008-SO/30) and another to operate a Soil Thermal Treatment Facility (138634-006-SO/27). The facility also has an Air permit to operate a Soil Thermal Treatment Facility (1050319-014-AO). Compliance with those permits and associated rules were not included as part of this inspection. The inspectors were accompanied throughout the inspection by Mr. Mark Alessandroni, the General Manager. The facility was last inspected by the Department's Hazardous Waste Section on 01-14-13. The most recent inspection by the Department's Solid Waste Section was on 07-22-15.

Process Description:

Clark operates a Materials Processing Facility, for the processing, consolidation and bulking of nonhazardous solid waste materials, as well as a Soil Thermal Treatment Facility for the processing and thermal treatment of nonhazardous solid waste soil and soil-like materials. Mr. Alessandroni indicated that sawdust is the primary solidification agent, although cement kiln dust is also used. In addition, Clark transports hazardous waste and universal mercury wastes from generators' sites usually directly to the designated facilities or second transporter. Clark does not transport used oil. Clark also transports petroleum contact water (PCW) and currently takes it directly to Aqua Clean in Lakeland, FL. Hazardous and universal wastes are generally not brought back to the facility.

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Clark transports hazardous waste for customers that already utilize its other services. The majority of hazardous waste transported is generated by fueling facilities from cleanouts of spill control equipment, such as spill buckets. Hazardous and universal wastes are transported only in enclosed box trailers and only in containers. No bulk wastes are transported. As indicated, most waste is taken from the generator directly to the designated facility, but occasionally a driver will stop by the facility to pick up paperwork, etc. According to Mr. Alessandrone, at no time is waste ever parked at the facility for more than a couple of hours before continuing to its intended destination. Routes are generally scheduled so that the last stop of the day is Freehold Cartage in Bartow, which is a certified hazardous waste transporter and a hazardous waste transfer facility.

Clark employs one primary driver and one back up driver. There is one tractor/cab and two trailers. Approximately 90% of wastes transported are nonhazardous and usually investigative-derived. The cab and one trailer were out at the time of the inspection, but the second trailer was inspected and found to be empty. During the walk through the yard, three unlabeled 55-gallon drums were observed staged by the office building. Mr. Alessandrone said the drums contained papers past their retention date that had been removed from storage. The inspectors requested that the drums be opened, and it was confirmed that they contained old papers awaiting shredding. It was recommended that all drums/containers at the facility be labeled as to their contents.

Jim Clark maintains the disposal documents for PCW, and because he was out of the office at the time of the inspection, they were not reviewed. Hazardous waste manifests were reviewed. Clark is moving to an electronic recordkeeping system, but paper manifest copies were still available. During the review, the inspector noted that for one of Clark's customers, the date the generator signed the manifest was often a month or more earlier than the date Clark's driver signed it. Mr. Alessandrone explained that this was because the original manifests were prepared and sent to the customer's corporate offices. They would then be reviewed and signed by the corporate representative and returned to Clark, which would then pick up the waste.

This practice was discussed during the review, and the inspector recommended that a notation be added to the manifest explaining the discrepancy. Afterward the inspection, however, this issue was researched further by the inspector and subsequently discussed among the Hazardous Waste Section. As a result, the Department has determined that this practice is not prohibited by either the current RCRA rules or by DOT. Therefore, the generator can continue dating the manifests ahead of the pickup, and there is no reason for Clark to annotate or explain the differences in the dates. No other issues were noted.

Conclusion:

Based on the observations made during this inspection, Clark was found to be operating in compliance with rules applicable to hazardous and universal waste transporters.

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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

7/7/2016

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.