



Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

October 24, 2016

Mr. Jeff Ohlrich, Branch Manager
Flagler Construction Equipment
539 SW Arrohead Terrace
Lake City, Florida 32024
johlrich@flaglerce.com

Re: Flagler Construction Equipment
EPA/DEP ID: FLR 000 213 686
Columbia County – Hazardous Waste

Dear Mr. Ohlrich:

Department personnel conducted a compliance inspection of the above-referenced facility on August 2, 2016. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report has been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Homer Butler at (904) 256-1531 or via e-mail at Homer.Butler@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner
Environmental Manager
Northeast District

Enclosure(s): Inspection Report

cc: Mr. Luke Nash, Parts and Sales Manager, lnash@flaglerce.com



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

FACILITY INFORMATION:

Facility Name: Flagler Construction Equipment

On-Site Inspection Start Date: 08/02/2016

On-Site Inspection End Date: 08/02/2016

ME ID#: 114928

EPA ID#: FLR000213686

Facility Street Address: 539 SW Arrowhead Ter, Lake City, FL 32024-3374

Contact Mailing Address: 539 SW Arrowhead Terrace, Lake City, FL 32024

County Name: COLUMBIA

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Homer D. Butler, Inspector; Cody Thompson, Supervisor

LATITUDE / LONGITUDE: Lat 30° 7' 21.2088" / Long 82° 39' 37.7784"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Flagler Construction Equipment (FCE) was inspected August 2, 2016, as an unannounced hazardous waste compliance inspection. FCE has not been previously inspected by the Department's hazardous waste program. FCE is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. FCE registered as a Used Oil Transporter/Transfer, and Used Oil Filter Transporter/Transfer facility. FCE has been issued the EPA/DEP identification number: FLD 000 213 686. Please use this number on all hazardous waste related correspondence with the Department.

FCE conducts sales and service for various Volvo, Takeuchi, Toro, Aztec, and KPI industrial equipment and vehicles. Equipment maintenance is conducted in the field and on-site in the two service bays. This facility has operated as FCE at this location since 2013, has two preventative maintenance trucks, four employees, and has one well and a septic tank. FCE is renting the property, and the facility at Lake City operates five days a week, Monday through Friday.

The facility consists of one main building with two service bays, a connected vehicle wash bay, and an attached storage building.

The following areas were evaluated during the inspection: The service bays, the vehicle wash bay, and the storage building. Mr. Cody Thompson accompanied the inspectors during the inspection.

Inspection Date: 08/02/2016

Process Description:

Service bays

Used oil, used oil filters, and spent antifreeze are generated in the shop bays. Used oil and spent antifreeze is accumulated separately in one 10-gallon mobile container or two plastic containers. Used oil filters are drained on the 10-gallon mobile container (Photo 1). All three accumulating containers were not labeled with the words "Used Oil" (Photo 2) [40 CFR 279.22(c)(1)]. The facility labeled the containers during the inspection.

The service bays share one 30-gallon (pureWASH systems) parts washer that is serviced by Heritage Crystal Clean on a continued use program, every eight weeks (Photo 3).

The facility used small amounts of brake cleaner on a shop towel. The brake cleaner contains toluene. Non-empty aerosol cans are punctured and drained into a drum and managed as hazardous waste.

Shop rags from the service areas are accumulated in one 5-gallon container that was closed, but not labeled "Excluded Solvent Contaminated Wipes" (Photo 4). The facility labeled the container during the inspection.

Vehicle Wash Bay

In the Vehicle Wash Bay, pressurized well water and soap are used to clean equipment and vehicles. A grated trench drainage system in the floor is used to channel wastewater to a covered holding tank that is located inside the storage building as described below.

Inside the Vehicle Wash Bay were two 55-gallon drums of used oil filters, one 55-gallon drum of spent antifreeze, and a single-walled 250-gallon metal tote of used oil (Photo 5). All containers were properly labeled, however the metal tote was not double-walled or located within in secondary containment (Photo 6) [Rule 62-710.401(6), FAC].

Storage Building

The Storage Building is used to store empty 5-gallon containers for recycling and servicing equipment (Photos 7 and 8).

On the left side of the room is the 500-gallon wash bay accumulation tank (Photo 9). Non-hazardous oily wastewater generated from the vehicle wash bay is accumulated inside the tank and is pumped out by Heritage Crystal Clean monthly.

Used Oil Transporter

FCE maintains registration as a Used Oil Transporter, Used Oil Filter Transporter, and Transfer Facility for the transport of its own used oil via two preventative maintenance trucks that perform off-site service and maintenance. Each truck has a 30-gallon capacity, and records supplied by FCE indicate the trucks transports about 9 to 17 gallons of used oil daily. A current registration certificate was displayed at the facility. FCE staff maintain daily logs recording the location, date, and amount of used oil transported. The facility had a current proof of financial responsibility.

Record Review

At the time of the inspection, the facility was operating as a CESQG of hazardous waste for small amounts of liquid from non-empty aerosol cans, a Used Oil Transporter, and Used Oil Generator. A review of FCE's operating records, personnel training, and financial assurance records, were found to be in order.

Inspection Date: 08/02/2016

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

Type: Violation

Rule: 279.22(c)(1)

Explanation: Three used oil containers were not labeled with the words "Used Oil."

Corrective Action: No further action is required. The facility is in compliance per a August 19, 2016 email.

Type: Violation

Rule: 62-710.401(6)

Explanation: One 250-gallon used oil metal tote was not double walled.

Corrective Action: No further action is required. The facility is in compliance per a August 19, 2016 email.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 08/02/2016

Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Inspection Date: 08/02/2016

1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 08/02/2016

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.

Pam Fellabaum

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

10/17/2016

DATE

Homer D. Butler

Inspector NAME

Inspector

Inspector TITLE

FDEP

ORGANIZATION

Cody Thompson

Representative NAME

Supervisor

Representative TITLE

Flagler Construction Equipment

ORGANIZATION

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.

Report Approvers:**Approver:** Pam Fellabaum**Inspection Approval Date:** 10/17/2016