Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Florida Transformer Inc DBA Emerald Transformer

On-Site Inspection Start Date: 09/15/2017 **On-Site Inspection End Date:** 09/15/2017

ME ID#: 74617 **EPA ID#:** FLR000168203

Facility Street Address: 4509 State Highway 83 N, Defuniak Springs, FL 32433-3960

Contact Mailing Address: P O BOX 507, Defuniak Springs, FL 32433-3960

County Name: WALTON

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Paige L Plier, Inspector

Other Participants: Corinna Clanton, Inspector; Jessica Pennington, Environmental Manager

LATITUDE / LONGITUDE: Lat 30° 47' 9.6599" / Long 86° 7' 16.1428"

SIC CODE: 3612 - Manufacturing - transformers, except electronic

TYPE OF OWNERSHIP: Private

Introduction:

Florida Transformer Inc.(FTI), is a power transformer repair and processing facility located in Defuniak Springs, Florida. The facility operations include transformer repair, used oil processing, and transformer sales and service. FTI is notified with the Department as a Large Quantity Generator (LQG) of hazardous waste, a used oil transporter/transfer facility/processor/marketer, and used oil filter transporter. Transporter registrations expire on June 30, 2018.

The facility has been in operation for over 38 years and has approximately 113 employees working from 6am to 4:30pm, six days per week. The facility is situated on 25 acres, of which 15 acres are actively used while 10 are not. FTI is on the city sewer system. The current facility manager is Andy Hall. The inspection was facilitated by Jessica Pennington, FTI’s Director of Safety and Environmental Compliance.

Process Description:

Throughout the facility, the main points of hazardous waste generation are sludges resulting from the used oil processing unit (Redragon), waste from paint booth operations, and materials from laboratory analysis of transformer oil.

On September 15, 2017, Department personnel Paige Plier and Corinna Clanton conducted a routine inspection of the FTI site. The inspection consisted of visual site examination and a review of the facility's records. The visual inspection consisted of the following: intake processing, laboratory, PCB ancillary area/universal waste storage area, hazardous waste 90-Day storage area, Redragon used oil processor/tank farm, middle paint booth, and the transformer repair shop.

Intake Processing:

The facility receives transformers from Alabama, Mississippi, Georgia, Tennessee, Florida, North Carolina, South Carolina, and Maryland. The facility uses contracted drivers to transport all out-of-state pickups. Transformers arrive at Intake Processing which is a large warehouse building with open garage bays and an extended roof that covers the loading dock area. The transformers are unloaded and placed onto a conveyor system into one of ten assembly lines based on transformer type (Photo 1). Any transformers that are destined for disposal from the generator must be accompanied by oil analysis test documents before being received by facility. The transformers that are not designated for disposal have oil samples taken once they arrive at the facility. Each transformer has its own barcode attached to it once it enters the facility. This barcode follows the transformer throughout its processing. After the oils have been tested for polychlorinated biphenyl (PCB) concentration, the transformers receive an additional colored tag based on the average PCB concentration in parts per million (ppm). Transformers with PCB-contaminated oil receive and a red and orange tag and the transformers with non-PCB oils (< 2ppm) receive a white tag. Transformers are also temporarily spray painted with their tag color and the PCB concentration is written on the lid of the transformer (Photo 2). Transformers that need repairs are marked with a blue "X" or an "R."

Oils that are found to have less than two ppm of PCBs are filtered, visually inspected for moisture and place into a storage tank. The removed oils that range between 2-49 ppm of PCBs are pumped to one of three holding tanks. These oils are then processed via the onsite oil processing equipment (Redragon) and subsequently stored in a 15,000-gallon tank. The processed oils are marketed as a lubricant. Transformer oils that have between 50 and 499 ppm of PCB content are pumped into one of four 1,295-gallon storage tanks located in the PCB storage room. Transformers that have a content of 3,000 gallons or more of used oil or have a PCB content of above 499 ppm are not processed onsite. These transformers are moved to the PCB storage room and transferred to another location in Pell City, Alabama. FTI also receives customer generated used oils in plastic IBC totes and consolidates those with the facility generated used oils.

The intake processing area was equipped with a shower & eyewash station and multiple emergency spill kits. No violations were observed in this area.

Laboratory:

The facility conducts all sampling tests in the onsite laboratory located adjacent to and west of the Intake Processing area. All sample containers are matched to the barcode that is applied to the individual transformers in the intake area. The samples have hexane and hydro sulfuric acid added to them in preparation for use in the facility's gas chromatic spectrometer to determine the PCB content of the oil samples. Once the PCB contents have been established, the discarded samples are satellite accumulated in a five-gallon container. The container was closed and labeled as "Hazardous Waste." When full, the contents of the satellite container are then transferred to the PCB ancillary area located to the southeast of the intake assembly lines. These samples are subsequently consolidated into "PCB"-labeled gaylord boxes before eventual transport. All waste containers are labeled as "PCB waste" only.

The laboratory had evacuation routes and emergency procedures posted inside by the door. No deficiencies were noted in this area.

PCB Ancillary area/Universal Waste storage area:

The PCB Ancillary Area (PAA) is located behind the intake processing area along the southern wall of the warehouse building. The PAA houses consolidated laboratory PCB wastes and transformers that contain used oils having between 50-499 ppm of PCBs. These transformers are separated from the rest of the waste by a concrete berm (Photo 3). The oils generated in the PAA from the transformers are pumped into the PCB storage room which is located on the opposite side of the southern wall of the warehouse.

The facility also stores its universal wastes in this area, specifically in the southeast corner of the building. An

open swing top trash container was observed with universal waste lamps that were not boxed or otherwise protected from damage (Photo 4). Labels and accumulation start dates (ASDs) were observed on all universal waste containers in this area.

90-Day Storage Area:

The hazardous waste storage area is in the northeast corner of the intake processing building. At the time of this inspection the 90-Day area was full and to allow for appropriate aisle spacing some 55-gallon containers were stored by the PCB Ancillary Area in front of the concrete berm. Wastes currently being stored included: used oil, paint filters, used mineral spirits, and “oily waste.” Two used oil double-walled storage tanks are positioned along the east wall of the building, one labeled as “Used Oil Sludge” and the other as “Used Oil – Esther Based.” The sludge is generated from the operation of the used oil processing machine (Redragon). All containers are labeled with “hazardous waste” stencils, a description of the contents, ASDs, and a sticker indicating the health, flammability, and reactivity hazards of that waste (Photo 5). The oldest observed ASD was 7/6/17.

Mineral spirit waste is generated from the rinsing of the drums/transformers that contained PCB contaminated used oil. The mineral spirits stored in this area are distilled and then reused in the cleaning process. The mineral spirits distillation unit is located next to the 90-Day storage area along the east wall (Photo 6). The mineral spirits are re-used 2-3 times before being transported for disposal by a registered transporter. The still bottoms from the mineral spirits distillation process are containerized and shipped out as hazardous waste. No violations were observed in this area.

Redragon Used Oil Processor/ Tank Farm:

The Redragon Used Oil Processor and Tank Farm is located south of the Intake area around the rear of the complex. The Redragon unit is custom installed within a semi-truck trailer that is parked on a collapsible secondary containment berm (Photo 7). A system of pipes connects the Redragon unit to the Tank Farm and the rest of the facility (all piping observed during the inspection was labeled identifying the contents and direction of flow). The waste generated from the operation of the Red Dragon are sludges contaminated with toluene and benzene. Inspectors observed five drums of hazardous waste being stored outside of the Redragon used oil processor. The drums were labeled "Hazardous Waste", and had stickers indicating the contents, ASD, and other safety hazards. North of the Redragon unit is the facility’s Tank Farm.

There is a total of 14 storage tanks located in the facility tank farm. Four of the fourteen tanks contain RCRA regulated used oils. Tank-T holds used oils that have a PCB content of 2-49 ppm. Tanks B and F contain used oils that have less than 2 ppm PCBs. Tank-C contains non-PCB used oils. All of these tanks have a capacity of 8,400-gallons. Tanks PO-1 and PO-2 are for storing processed used oils and have a capacity of 8,225-gallons and 15,000-gallons respectively. Oil in Tank PO-1 is for onsite repair purposes and oil in Tank PO-2 is for vendor purposes. Tank G is for storage of mineral spirits with concentrations of less than 50 ppm of PCB. Tanks T, B, F, C, G, and PO-1 are in a concrete secondary containment unit (Photo 8). Tank PO-2 is a double-walled, above-ground storage tank. No violations were observed.

Middle Paint Booth:

FTI has three paint booths located onsite north of the Tank Farm. The facility paints all transformers that are being repaired/refurbished. The wastes generated in this area are paint booth filters, waste solvent and waste paint. A visual inspection of the middle paint booth was conducted. The filters and liquids are satellite accumulated in two 55-gallon drums. The facility procedure is to date the containers when the first contents are added and dated a second time when it is full. After the drum is full it is moved to the 90-day storage area within three consecutive days of the “full” date. No violations were observed in the paint booth area.

Transformer Repair Shop:

The last area visually inspected was the transformer repair warehouse. Repairs take place in two connected buildings comprising the western side of the facility complex. In general, there are three repair areas based on the transformer type and each area is equipped with a mineral spirits washer, a processed oil product tote, and satellite accumulation containers. The repair area for large transformers did not have a mineral spirits washer. Satellite containers were placed on secondary containment platforms (Photo 9). A few containers had funnels attached that were open. Inspectors reminded Mrs. Pennington that containers must be closed

securely unless waste is being added. No other discrepancies were noted.

Records:

The facility used oil shipping records, used oil tank inspections, hazardous waste and used oil training data were inspected and no discrepancies were observed. A review of facility hazardous waste manifests showed that FTI transports their own waste materials. Transporter certifications and permits from the DEP and DOT were available onsite for review. The designated facilities are Clean Earth Environmental Group, Inc (ALD981020894) and Chemical Waste Management (ALD000622464). The facility's Contingency Plan was reviewed and found to be missing information specific to the Resource Conservation and Recovery Act (RCRA). The plan did not include emergency coordinator addresses, a list of fire extinguishers, or documentation showing the plan was submitted to local emergency teams.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	265.52(d)
Question Number:	4.104
Question:	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)
Explanation:	The Contingency Plan did not include emergency coordinator addresses.
Corrective Action:	Update your Contingency Plan to include the missing contact information.

Type:	Violation
Rule:	265.52(e)
Question Number:	4.106
Question:	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 265.52(e)
Explanation:	The Contingency Plan did not include a list of fire extinguishers onsite or an indication of where they are located throughout the facility.
Corrective Action:	Include a map of the facility's fire extinguishers.

Type:	Violation
Rule:	265.53(b)
Question Number:	4.109
Question:	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)
Explanation:	The Contingency Plan must be shared with local emergency teams (police, fire dept., hospitals, etc.)
Corrective Action:	Provide documentation showing the Plan was shared with local emergency teams (e.g., a letter draft or mail receipt).

Type:	Violation

Rule:	62-710.401(6)
Question Number:	5.12
Question:	Closed or otherwise protected from the weather? 62-710.401(6)
Explanation:	At least two used oil containers in the Transformer Repair area were open during the inspection.
Corrective Action:	Ensure all used oil containers are closed unless adding or consolidating waste.

Type:	Violation
Rule:	62-737.400(5)(a)
Explanation:	Universal waste lamps were not in a closed container or protected from potential breakage.
Corrective Action:	Place spent lamps in a closed container that is structurally sound.

COMMENTS:

Photos were taken on 9/15/17.

PHOTO ATTACHMENTS:

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

Conclusion:

Universal waste lamps must be containerized and closed. Used oil containers must be closed unless adding or consolidating waste.

Upon completion of the inspection, FTI was found to be out of compliance with State and Federal hazardous waste regulations.

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	✔		

4.0 - Large Quantity Generator 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.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✔		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.12(a)	✔		
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)	✔		
Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.21	Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1) ☐ Item 1. Generator's U.S. EPA Identification Number ☐ Item 2. Page 1 of "X" (total number of pages used to complete the manifest) ☐ Item 3. Emergency Response Phone Number ☐ Item 4. Manifest Tracking Number ☐ Item 5. Generator's Mailing Address, Phone Number and Site Address ☐ Item 6. Transporter 1 Company Name & U.S. EPA ID Number ☐ Item 7. Transporter 2 Company Name & U.S. EPA ID Number ☐ Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number ☐ Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group. ☐ Item 10. Containers (Number and Type) ☐ Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates) ☐ Item 12. Units of Measure (Weight/Volume) ☐ Item 13. Waste Codes. Enter up to 6 of the most representative waste codes. ☐ Item 14. Special Handling Instructions and Additional Information ☐ Item 15. Generator's / Offeror's Certifications ☐ Item 16. International Shipments (Import or Export must be noted) ☐ Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt) ☐ Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility) ☐ Item 19. Hazardous Waste Report Management Codes (On returned copies only) ☐ Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)	✔		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✔		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✔		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✔		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✔		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23.(c)			✔

Inspection Date: 09/15/2017

Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.27	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) ☐ The next non-rail transporter? ☐ The Designated Facility if transported solely by rail? ☐ The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)			✓
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.34	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) ☐ Generator's Name and Address? ☐ Generator's EPA ID Number? ☐ Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.34(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 265.111? 265.111			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 265.114? 265.114			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.34(a)(2)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.34(c)(1)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
4.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)	✓		
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)	✓		

Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)	✔		
Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 265.171	✔		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 265.172	✔		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(a)	✔		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 265.173(b)	✔		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✔		
4.63	Does the generator properly document the weekly inspections? 62-730.160(5)	✔		
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 265.176	✔		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 265.177(a), 265.17(b)	✔		
4.67	If the facility places hazardous waste in an unwashed container that previously held incomplatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(b)	✔		
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 265.177(c)	✔		
Item No.	40 CFR 265.16 -- Personnel Training	Yes	No	N/A
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 265.16(a)(1)	✔		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 265.16(a)(2)	✔		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 265.16(a)(2)	✔		
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 265.16(a)(3)	✔		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 265.16(b)	✔		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 265.16(b)	✔		
4.75	Does the generator review training annually, at least once each calendar year? 265.16(c)	✔		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 265.16(d)(1)	✔		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 265.16(d)(2)	✔		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 265.16(d)(3)	✔		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 265.16(d)(4)	✔		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 265.16(e)	✔		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 265.16(e)	✔		
Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 265.31	✔		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 265.32(a)	✔		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 265.32(b)	✔		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(c)	✔		

Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 265.32(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 265.33	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 265.34(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 265.34(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 265.35	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 265.37(a)(1)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 265.37(a)(2)	✓		
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 265.37(a)(4)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 265.37(b)			✓
Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 265.51(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 265.51(b)			✓
4.99	Fires? 265.52(a)	✓		
4.100	Explosions? 265.52(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 265.52(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 265.52(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 265.52(c)	✓		
4.104	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)		✓	
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 265.52(d)	✓		
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 265.52(e)		✓	
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 265.52(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 265.53(a)	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)		✓	
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 265.54	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 265.55	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 265.56? 265.56			✓
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 265.56(i)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.40(c)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		

Item No.	Record Keeping and Reporting	Yes	No	N/A
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was inteneded to be shipped off-site? 262.53(a)			✓
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.60? 262.60			✓
Item No.	40 CFR Part 268 -- Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)	✓		
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)	✓		
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)	✓		
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.16	If the generator choses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)	✓		
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)	✓		
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓

5.0 - Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✓		
Item No.	Secondary Containment	Yes	No	N/A
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.12	Closed or otherwise protected from the weather? 62-710.401(6)		✓	
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)	✓		
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)	✓		
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		

Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.28	stop the release? 62-710.850(5)(b)(1)			✓
5.29	contain the released oil? 62-710.850(5)(b)(2)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)(b)(3)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4.			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)	✓		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)	✓		
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓

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Item No.	Marketing and Processing	Yes	No	N/A
5.0.9.2	Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

6.0 - Transporters 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.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - CESQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓

Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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.

Paige L Plier	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	DEP	09/21/2017
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Corinna Clanton	Inspector
Inspector NAME	**Inspector TITLE**
	DEP
	ORGANIZATION

Jessica Pennington	Environmental Manager
Representative NAME	**Representative TITLE**
	FTI
	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: Brad T Hartshorn **Inspection Approval Date:** 09/21/2017