



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

December 6, 2017

Mr. Ryan Harris, Program Manager  
Moran Environmental Recovery, LLC  
251 Levy Road  
Atlantic Beach, FL 32233  
[rharris@moranenvironmental.com](mailto:rharris@moranenvironmental.com)

**Re: Compliance Assistance Offer  
Moran Environmental Recovery, LLC  
EPA/DEP ID: FLD 092 718 576  
Duval County – Hazardous Waste**

Dear Mr. Harris:

A compliance inspection was conducted at your facility on September 6, 2017, under the authority of Section 403.091, Florida Statutes. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapter 62-710, Florida Administrative Code, were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the 'New Potential Violations and Areas of Concern' and respond within 30 days of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a time schedule describing how/when the issue will be addressed;
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit your facility to discuss the Areas of Concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond appropriately may result in the initiation of formal enforcement proceedings.

Moran Environmental Recovery, LLC  
Facility ID No.: FLD092718576  
Compliance Assistance Offer  
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Please address your response and any questions to Cheryl Mitchell of the Northeast District Office at 904-256-1620 or via e-mail at [cheryl.l.mitchell@dep.state.fl.us](mailto:cheryl.l.mitchell@dep.state.fl.us). We look forward to your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Heather Webber".

Heather Webber  
Environmental Administrator

Enclosure: Inspection Report



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

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**FACILITY INFORMATION:**

**Facility Name:** Moran Environmental Recovery LLC  
**On-Site Inspection Start Date:** 09/06/2017      **On-Site Inspection End Date:** 09/06/2017  
**ME ID#:** 44626      **EPA ID#:** FLD092718576  
**Facility Street Address:** 251 Levy Rd, Atlantic Beach, FL 32233-2613  
**Contact Mailing Address:** 75 D York Ave, Randolph, MA 02368  
**County Name:** Duval      **Contact Phone:** (781) 815-1100

**NOTIFIED AS:**

Non-Handler  
Transporter  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Hazardous Waste Transporter facility  
Routine Inspection for Universal Waste Transporter facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for Non-Handler facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector  
**Other Participants:** Ryan Harris, Business Manager

**LATITUDE / LONGITUDE:** Lat 30° 20' 11.8525" / Long 81° 25' 9.1233"

**SIC CODE:** 1799 - Construction - special trade contractors, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Moran Environmental Recovery, LLC (MER) was inspected on September 6, 2017. The facility was last inspected by the Department's Hazardous Waste Program on October 16, 2013. The facility is a registered Hazardous Waste Transporter, Used Oil and Used Oil Filter Transporter, Universal Waste Transporter and a Non-Handler of hazardous waste. MER has approximately 20 employees, is connected to city water and sewer and has operated at this location since 2001. Mr. Ryan Harris, MER Business Manager, was present throughout the inspection. MER has been assigned EPA ID number FLD 092 718 576. Please use this number on all hazardous waste related correspondence with the Department.

**Process Description:**

MER is an environmental services company that offers industrial and marine services, site remediation, decontamination and abatement services, and emergency spill response. The facility consists of the main building with administrative offices and a Maintenance Shop, an outside Wash Pad and a Pole Barn.

Summary of MER's registered transporter activities.

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Hazardous Waste Transporter: According to Mr. Harris, even though it is registered as a Hazardous Waste Transporter, MER does not routinely transport hazardous waste. MER maintains its status as a Hazardous Waste Transporter in case of emergency, but MER usually contracts-out this activity. MER has not transported any hazardous waste in the last three years.

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**Used Oil and Used Oil Filter Transporter:** The majority of MER's transportation operations consist of used oil, used oil filters, bilge water and oily waste water. These waste streams are generally transported to Water Recovery, Inc. (FLR 000 069 062) for processing.

**Universal Waste Transporter:** MER maintains its status as a Universal Waste Transporter in case of emergency, but MER does not routinely transport universal wastes. MER has not transported any universal waste in the last three years.

#### Summary of facility areas inspected.

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##### Maintenance Shop

MER has one vacuum truck, one combination blower/vacuum truck, one 3,500-gallon tanker trailer, one 5,000-gallon tanker trailer and one stakebed truck in service. Vehicles are parked behind the main office building and adjacent to the facility's Maintenance Shop area (Photos 1 and 2). MER can also use additional trucks via a cooperative service agreement it maintains with Jacksonville Spillage Control. General maintenance of vehicles is performed in the Maintenance Shop area (Photo 3). The facility operates one aqueous parts washer that an area technician stated has not generated any waste for several years. A waste determination was previously performed on the parts washer liquid waste and the filter. Both were determined to be non-hazardous. Used oil and used oil filters are collected in 55-gallon drums located inside the shop. The drums were properly closed and labeled and on a containment pallet. At the time of the inspection, there were numerous oil filters staged on top of threaded drain pans that were attached to the top of each used oil drum. This is an Area of Concern. The facility should ensure timely containerization of the drained used oil filters. Spent antifreeze is also collected in this area in a 55-gallon drum.

##### Universal Waste Area

The facility stages electronic waste and universal waste in the corner of the Maintenance Shop (Photo 4). At the time of the inspection, there were three containers of universal waste mercury-containing lamps in the area that MER generated. The containers were closed, labeled and had been accumulating for less than a year. There were no containers of customer-generated universal waste in the area at the time of the inspection.

##### Wash Pad

A large concrete pad located in the rear of the facility is used to temporarily park tanker trucks of used oil and oily water and as a wash-out area for empty trucks and containers when they return to the facility (Photo 5). If MER picks up a load of used oil or oily water from a customer, and is not immediately able to transport it to Water Recovery LLC (WRI) for processing, the truck is parked on the pad for less than 24-hours and then taken to WRI the next morning. The facility also washes out the inside of its skids/tanker trucks onto the pad. This wastewater is allowed to drain into a sump, and it is either pumped directly into another tanker truck to be hauled to WRI, or it is pumped into a wastewater tank located on the pad (Photo 6). Rainwater had accumulated within the Wash Pad and the wastewater tank containment berm due to significant rainfall in the area the previous few days. However, the facility was in the process of pumping the water to the wastewater tanks at the time of the inspection. The pad and berms appeared to be good condition. Minor surface cracks were observed but appeared to have been resealed to ensure proper containment.

##### Pole Barn

The Pole Barn is a covered, open warehouse storage area in the rear of the property that is used to store spill cleanup material and equipment, pump hoses and other parts and equipment. The warehouse area is also used to stage containers of non-hazardous used oil, used oil filters, and oily waste debris pending transportation for final disposal. In the corner of the Pole Barn was a concrete secondary containment area where several 55-gallon containers of product chemicals were stored.

##### Security

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The facility is surrounded by a chain link fence topped with barbed wire. It appeared to be in good condition. The facility is accessed through a main entrance gate that is kept closed and electronically locked at all times. At the time of inspection, the gate was closed and adequate warning signage was posted.

##### Record Review

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WRI maintains used oil waste profiles provided by customers for oil it processes as required under 40 CFR

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279.44(b)(2) and performs halogen screening on each load of used oil delivered by MER to its facility. MER maintains copies of the WRI waste profiles and reviews the screening results performed by WRI on each delivery that is documented on the manifest, but MER does not screen the used oil it transports to determine the halogen content [40 CFR 279.44(a)].

Other records reviewed included insurance records, Transporter registration records, personnel training and training records, Contingency Plan, arrangements with local authorities, Used Oil and Used Oil Filter log, and manifests. All records reviewed appeared to be in order.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.44(a)
Explanation:	The facility did not determine whether the total halogen content of used oil that it transported was above or below 1,000 parts per million (ppm).
Corrective Action:	In order to return to compliance, the facility should determine if the total halogen count of all future shipments of used oil is less than 1,000 ppm by screening all shipments of used oil before transport.

PHOTO ATTACHMENTS:

Photo 1 - Vehicle Storage Area



Photo 2 - Vehicle Storage Area



Photo 3 - Maintenance Shop

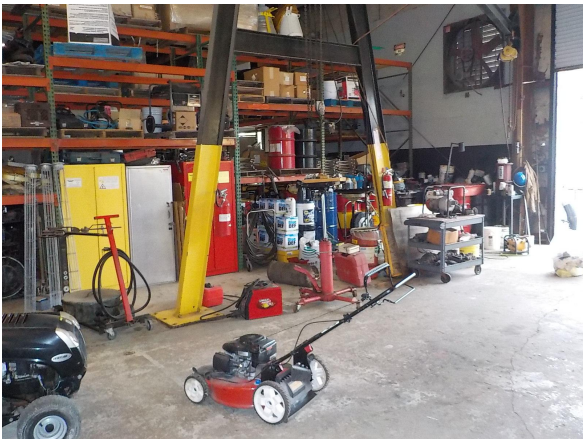


Photo 4 - UW Area





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Photo 5 - Wash Pad



Photo 6 - Wash Pad Storage Tanks



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**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	✓		

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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.

Cheryl L Mitchell

Inspector

**Principal Inspector Name****Principal Inspector Title**

DEP

11/20/2017

**Principal Inspector Signature****Organization****Date**

Ryan Harris

Business Manager

**Representative Name****Representative Title**

Moran Environmental Recovery, LLC

**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:**

Cheryl L Mitchell

**Inspection Approval Date:**

11/20/2017