



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 26, 2017

Mr. Jerry Stapp, Vice President
Lewis Environmental
1432 Cleveland St
Jacksonville, Florida 32209-6400
jstapp@lewispetroleum.com

Re: Lewis Environmental
EPA/DEP ID: FLR 000 048 561
Duval County – Hazardous Waste

Dear Mr. Stapp:

Department personnel conducted a hazardous waste compliance inspection of the above-referenced facility on October 17, 2017. Based on the information provided during 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.

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

C: Homer.butler@dep.state.fl.us
Enclosure: Inspection Report



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

FACILITY INFORMATION:

Facility Name: Lewis Environmental

On-Site Inspection Start Date: 10/17/2017

On-Site Inspection End Date: 10/17/2017

ME ID#: 33637

EPA ID#: FLR000048561

Facility Street Address: 1432 Cleveland St, Jacksonville, FL 32209-6400

Contact Mailing Address: PO Box 40763, Jacksonville, FL 32203

County Name: Duval

NOTIFIED AS:

CESQG (<100 kg/month)

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 Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Homer D Butler, Inspector

Other Participants: Jerry Stapp, Vice President

LATITUDE / LONGITUDE: Lat 30° 20' 27.6597" / Long 81° 40' 17.49"

SIC CODE: 5983 - Retail trade - fuel oil dealers

TYPE OF OWNERSHIP: Private

Introduction:

Lewis Environmental (Lewis) was inspected on October 17, 2017, as a hazardous waste compliance inspection. Jerry Stapp (Lewis), Laurie Cass (Lewis) were present throughout the entire inspection and Pam Fellabuam was present for the first half of the inspection. Lewis was last inspected by the Department of Environmental Protection's (Department) Hazardous Waste Program on October 24, 2013. At the time of the current inspection, Lewis was operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

The facility sells oil, lubricants, diesel and gasoline products. Lewis is a registered Used Oil Transporter, Used Oil Filter Transporter, Petroleum Contact Water (PCW) Transporter and Public Used Oil Collection Center (PUOCC). The facility has also been at this location for over 28 years. Lewis currently has approximately 45 employees and operates eight tanker trucks and two box trucks with twelve drivers. The facility operates Monday through Friday 6:00 AM to 5:00 PM and some weekends. The facility is on City water and is connected to City sewer.

The facility consists of a Maintenance Shop, Tank Farm, New Oil Warehouse, Tank Painting Area and a Non-Hazardous Roll-off Area.

Process Description:

Summary of Registered Activities

Used Oil Transporter/Transfer Facility: Lewis transports used oil from customers back to its facility in tanker trucks. The used oil then placed into one of the three aboveground tanks described below. Used oil stored on-site is held for less than 35 days. Used oil is transferred from the aboveground tanks to tanker trucks for off-site transportation.

Inspection Date: 10/17/2017

Used Oil Filter Transporter/Transfer Facility: Lewis transports used oil filters from customers back to its facility in 55-gallon drums. The drums of filters are then transferred to the New Oil Warehouse described below. Used oil filters stored on-site are held for less than 35 days. Use oil filter drums are transported off-site by semi-trucks.

PCW Transporter: Lewis does not store PCW on site. PCW is transported by Lewis directly to Liquid Environmental Solutions, LLC. (LES) or Water Recover Incorporated (WRI).

Public Used Oil Collection Center (PUOCC): A few of Lewis's customers bring in small amounts of used oil where it is placed into a small tank. Used oil is transferred from the PUOCC tank to tanker trucks for off-site transportation.

Maintenance Shop

At the Maintenance Shop, newly refurbished tanks are pressurized and quality control checked for function and condition (Photo 1). Mechanical pumps and minor equipment are maintained and repaired inside the Maintenance Shop.

The facility uses diesel fuel to test the pumps on customer tanks prior to delivery. The fuel is reused for the tests, and this practice does not generate a waste.

Mechanics use Pyroil™ Non-Chlorinated Brake Parts Cleaner occasionally on disposable rags. According to the Safety Data Sheet (SDS), Pyroil™ Non-Chlorinated Brake Parts Cleaner contains 30-50% solvent naphtha (petroleum) light aliphatic, 20-30% methanol, 20-30% acetone, 5-10% toluene, 5-10% carbon dioxide and 1-5% n-heptane. The flash point is 19.94 degrees Fahrenheit. Non-empty aerosol cans are D001 hazardous waste. Waste aerosol cans are collected in a container located inside the Maintenance Shop. Waste aerosol cans are then taken to a 55-gallon drum with an aerosol can puncturing system (Photo 2). Waste shop rags are managed as excluded solvent contaminated wipes. New and used lead acid batteries are also stored inside the Maintenance Shop (Photo 3).

Tank Farm

The Tank Farm area (Photo 4) is divided into two sections, used oil and industrial waste water tanks (Photo 5) and product tanks (Photo 6). In the used oil tank area, there are two 6,000-gallon tanks and one 12,000-gallon tank for used oil (Photos 7-9) and one 6,000-gallon industrial waste water tank (Photo 10). These tanks were properly labeled and were located within secondary containment. The secondary containment had accumulated approximately a half inch of water from recent rain events. The accumulated rainwater had a visible sheen of oil on top (Photos 11 and 12). Mr. Stapp stated that the oily water inside the secondary containment is pumped out and transported to Liquid Environmental Solutions, LLC. for treatment.

Inside the containment area for the product tanks is one 250-gallon tank for PUOCC used oil (Photo 13). Mr. Stapp stated that this tank is used by customers that bring in small amounts of used oil. The tank was properly closed and labeled.

New Oil Warehouse

Product oil, lubricants, and supplies are stored in this warehouse for sale to customers (Photos 14-21). In one area of the warehouse (Photos 22 and 23), used antifreeze (Photo 24) and used oil filters (Photo 25) are off-loaded and stored. All containers observed were properly labeled. Used oil filters are removed from the 55-gallon drums upon arrival and placed onto a draining rack. Drained used oil from the used oil filters is collected into a 150-gallon used oil tank (Photo 26). Liquid used oil accumulating inside the bottom of the 55-gallon used oil filter drums is vacuumed out and pumped into the 150-gallon tank. Once drained, the used oil filters are placed back into 55-gallon drums for shipment off-site.

Tank Painting Area

Inside the Tank Painting Area, new and old tanks are painted (Photos 27 and 28). Tanks are painted with Benjamin Moore, Super Spec HP Urethane Alkyd Gloss Enamel Deep Base - P22-3B (Chevron Blue) paint. According to the SDS, the Chevron Blue paint contains 30% hydrotreated heavy naphtha petroleum, 10% distillates petroleum hydrotreated light, 10% titanium dioxide, 5% kaolin, 5% stoddard solvent, 5% xylene,

Inspection Date: 10/17/2017

0.5% ethyl benzene, 0.5% methyl ethyl ketoxime and 0.5% cobalt bis(2-ethylhexanoate). The flash point is 113 degrees Fahrenheit. Waste paint is a D001 hazardous waste. Containers holding paint are used until completely empty and discarded into the trash. Brushes used for painting are placed inside a small container and cleaned with mineral spirits. According to the SDS, 100% mineral spirits has a flash point of 108 degrees Fahrenheit. Waste mineral spirits are a D001 hazardous waste. This waste is poured into a 5-gallon satellite container. The container was properly closed and labeled. When full, the container is taken to the Duval county facility mentioned below. Waste paint brushes and rollers are non-hazardous, allowed to dry and then thrown into the trash. Mineral spirits on disposable rags are used for cleanup. These non-hazardous rags used for cleaning are then thrown into the trash.

Non-Hazardous Roll-Off

The facility has a small building that contains one large roll-off (Photo 29). Non-hazardous waste such as oily absorbents, waste rags, used air filters and grease is placed into the roll-off (Photo 30). Once full, the roll-off is sent off-site for disposal.

Record Review

Lewis Environmental is currently operating as a used Oil Transporter/Transfer Facility, Used Oil Filter Transporter/Transfer Facility, a PUOCC, a PCW Transporter and a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

Used oil is held for less than 35 days according to the facility operating log. Used oil is managed by Universal Environmental Solutions in Jacksonville every ten to fourteen days. The last shipment of used oil was on September 29, 2017.

For used oil shipments from new customers, the facility uses a prescreening form and a hand-held halogen detector to determine halogen levels before acceptance. For used oil shipments from existing customers, the facility only uses the hand-held detector to determine halogen levels. Lewis Environmental records used oil acceptance information on the invoicing manifest. Invoicing manifests are retained on-site for three years.

Used oil filters are held for less than 35 days according to the facility records. Used oil filters are managed by Environmental Management Conservation Oil, Corp. in Miami every 25 to 30 days. The last shipment of used oil filters was on September 18, 2017.

Used antifreeze is held for less than 35 days according to the facility records. Used antifreeze is recycled by Onsite Antifreeze Recycling in North Fort Myers once a month. The last shipment of used antifreeze was on October 5, 2017.

PCW is not stored at the facility. When transported, PCW is taken directly from the generator's facility to Liquid Environmental Solutions, LLC. or Water Recovery Incorporated in Jacksonville FL. The last PCW transport to Liquid Environmental Solutions, LLC. was on May 11, 2017

D001 spent aerosol can liquid and D001 waste mineral spirits are taken to the Duval County facility. The Duval County facility manages both Household Hazardous Waste and hazardous waste from CESQGs. Spent aerosol can liquid and mineral spirits were last taken to Duval county on September 28, 2017.

Personnel training had been conducted and documented. Insurance information for the facility was current. The Department registration letter was up to date and posted. All other records for the facility were reviewed and found to be in order.

PHOTO ATTACHMENTS:

Inspection Date: 10/17/2017

Photo 1 Maintenance Shop



Photo 2 Aerosol Can Puncturing System



Photo 3 Lead Acid Batteries



Photo 4 Tank Farm



Photo 5 Used Oil and Industrial Waste Water Tanks



Photo 6 Product Tanks



Inspection Date: 10/17/2017

Photo 7 6,000-Gallon Used Oil Tank



Photo 8 Second 6,000-Gallon Used Oil Tank



Photo 9 12,000-Gallon Used Oil Tank



Photo 10 6,000-Gallon Industrial Waste Water Tank



Photo 11 Oily Water Inside Secondary Containment Left Side



Photo 12 Oily Water Inside Secondary Containment Back



Inspection Date: 10/17/2017

Photo 13 250-Gallon Used Oil Tank



Photo 14 Product Warehouse



Photo 15 Product Oil Tanks Front Room



Photo 16 Product Oil Tanks Front Room



Photo 17 Product Oil Tanks Back Room

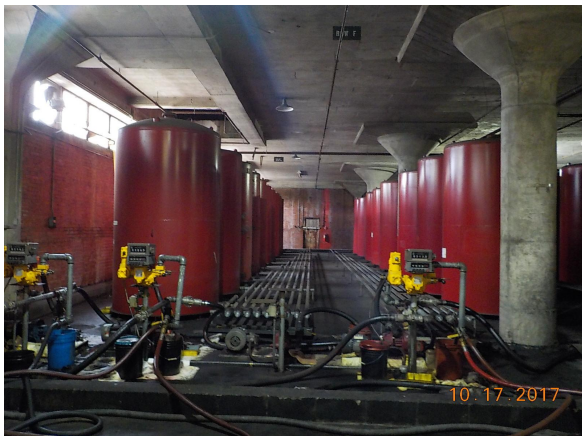
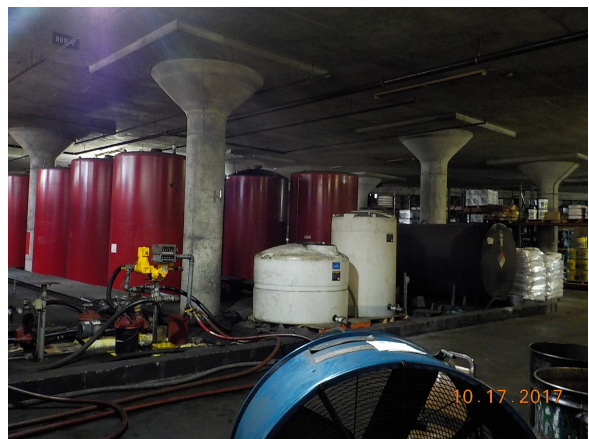


Photo 18 Product Oil and Antifreeze Tanks Back Room



Inspection Date: 10/17/2017

Photo 19 Product Oil Tanks Back of Product Warehouse



Photo 20 Product Lubricants and Antifreeze Far Back Room



Photo 21 More Product Lubricants and Antifreeze Far Back Room



Photo 22 Off-Loading and Storage Area North End



Photo 23 Off-Loading and Storage Area South End



Photo 24 Used Antifreeze Storage



Inspection Date: 10/17/2017

Photo 25 Used Oil Filter Off-Loading and Storage Area



Photo 26 Used Oil Filter Draining Area



Photo 27 Tank Painting Area Right Side



Photo 28 Tank Painting Area Left Side



Photo 29 Non-Hazardous Roll-Off



Photo 30 Non-Hazardous Roll-Off Contents



Inspection Date: 10/17/2017

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: 10/17/2017

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.

Homer D Butler

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

12/20/2017

Date

Jerry Stapp

Representative Name

Vice President

Representative Title

Lewis Environmental

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:

12/20/2017