Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Tampa Transflo Terminal

On-Site Inspection Start Date: 02/15/2018 **On-Site Inspection End Date:** 02/15/2018

ME ID#: 37009 **EPA ID#:** FLR000105338

Facility Street Address: 504 N 34th St, Tampa, FL 33605-6200

Contact Mailing Address: 500 Water St #J975, Jacksonville, FL 32202-4423

County Name: Hillsborough **Contact Phone:** (904) 245-2257

NOTIFIED AS:

SQG (100-1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Transfer Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Peter Wenner, ES III; Kevin Roberts, Terminal Manager

LATITUDE / LONGITUDE: Lat 27° 57' 5.8056" / Long 82° 25' 21.1206"

SIC CODE: 4789 - Trans. & utilities - transportation services, nec

TYPE OF OWNERSHIP: Private

Introduction:

The Tampa Transflo Terminal is a rail to truck and truck to rail transfer facility for bulk commodities, including used oil and hazardous waste. Intermodal operations have not changed since the facility was last inspected by the Department July 7, 2015, however the facility has replaced and expanded its office operations and constructed a new replacement maintenance building. The facility now has about 19 full time employees. As part of the facility upgrade, LED lighting was installed. The facility is still being operated by Arrow Material Services, and Kevin Roberts is still the terminal manager. The facility only accepts hazardous waste from Clean Harbors and used oil from Safety-Kleen. Material is loaded into rail cars by the truck drivers and stored on site until full cars are transferred to CSX for transport to either the next non-rail transporter or the destination facility. Transflo maintains a 10 day storage log for hazardous waste, and a 35 day storage log for used oil. The facility also generates small quantities of hazardous waste from loading and maintenance activities.

Process Description:

Track #2, which is the northernmost track at the facility is now being used for transfer of used oil. Track #4 is used for hazardous waste transfers, as this track is more than 50 feet of the property boundary, and therefore in compliance with 40 CFR 265.176 regulations, as adopted in FAC Rule 62-730.171(4)(a). Track pans are in place, and any spills which are not contained by the pan will drain to a trench which drains through a junction box to the facility's central storm water collection sump. Knife valves are able to isolate the trenches and a secondary valve is present if needed to cut off discharges from the facility. Emergency equipment, including spill kits, decontamination showers and fire extinguishers are in place next to the tracks. Staff are all equipped with communication devices while working on site.

The transfer facility logs show that no waste was stored more than the 10 or 35 day limit. If hazardous waste

rail cars are received that contain a heel, the time frame includes the days between receipt of the car through loading until shipment off site. The spreadsheet tracking the cars includes flags for the "must pull by" date. Hazardous waste manifests are signed by Transflo staff "on behalf of" CSX. Each movement can be tracked from the transfer facility log to the manifest by date and rail car number.

The facility maintains a contingency plan and has quarterly emergency response drills. Typically, at least once per year an outside agency such as the fire department participates in the drills. The most recent fire department inspection of the facility was August 2, 2017. Weekly inspection records were on file and included all required information. The facility contingency plan and training records were also up to date.

Hazardous waste and used oil generated on site is stored on containment pallets, under a protective canopy. One 55 gallon drum of used oil, two containers of used oil filters, several containers of used oil dry and one container of sulfuric acid filter waste dated 11/3/2017 were on site at the time of the inspection. All containers were closed and properly labeled. Manifests were available for review and complete.

Conclusion:

Based on the results of this inspection, the Tampa Transflo facility is in compliance with hazardous waste regulations

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)			✓

Item No.	SQG Waste	Yes	No	N/A
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.

Elizabeth Knauss	Environmental Consultant
Principal Inspector Name	**Principal Inspector Title**
E. Knauss	FDEP - SWD / 02/21/2018
Principal Inspector Signature	**Organization** / **Date**

Peter Wenner	ES III
Inspector Name	**Inspector Title**
	FDEP - SWD
	Organization

Kevin Roberts	Terminal Manager
Representative Name	**Representative Title**
	Arrow Material Services
	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: Elizabeth Knauss **Inspection Approval Date:** 02/21/2018