



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

April 13, 2018

Ms. Jan Barnes
Jacksonville Transflo Terminal
500 Water Street #J-975
Jacksonville, FL 32202-4423
jbarnes@transflo.net

Re: Jacksonville Transflo Terminal
EPA/DEP ID: FLD 984 253 526
Duval County – Hazardous Waste

Dear Ms. Barnes:

Department personnel conducted a compliance inspection of the above-referenced facility on February 17, 2018. 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.

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 Cheryl Mitchell at (904) 256-1620 or via e-mail at cheryl.l.mitchell@dep.state.fl.us.

Sincerely,

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

Heather Webber
Environmental Administrator

Enclosure: Inspection Report

cc: Mr. Jon Tines, Arrow Material Services, Terminal Manager, jtines@arrowmaterialservices.com



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

FACILITY INFORMATION:

Facility Name: Jacksonville Transflo Terminal
On-Site Inspection Start Date: 02/16/2018 **On-Site Inspection End Date:** 02/16/2018
ME ID#: 21835 **EPA ID#:** FLD984253526
Facility Street Address: 3796 Warrington St, Jacksonville, FL 32254
Contact Mailing Address: 500 Water St #J975, Jacksonville, FL 32202-4423
County Name: Duval **Contact Phone:** (904) 359-1323

NOTIFIED AS:

SQG (100-1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Hazardous Waste Transfer Facility
Routine Inspection for SQG (100-1000 kg/month) Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector
Other Participants: Jon Tines, Terminal Manager

LATITUDE / LONGITUDE: Lat 30° 19' 34.8335" / Long 81° 43' 10.1917"

SIC CODE: 4013 - Trans. & utilities - switching and terminal devices

TYPE OF OWNERSHIP: Private

Introduction:

Jacksonville Transflo Terminal (Transflo) was inspected on February 16, 2018. The facility was previously inspected by the Department's Hazardous Waste Program on February 19, 2014. The facility is currently registered with the Department as a Hazardous Waste Transporter and Transfer Facility, a Used Oil Transporter and Transfer Facility and a Small Quantity Generator (SQG) of hazardous waste. The facility is currently operating only as a Used Oil Transfer Facility and non-handler of hazardous waste but prefers to maintain a current registration as a Hazardous Waste Transporter and Transfer facility and SQG in the event that they change operations in the future. The facility has been issued the EPA/DEP identification number FLD 984 253 526. Please use this number on all hazardous waste correspondence in the future.

Transflo is a rail-to-truck or truck-to-rail transfer point for various materials including product hydrogen peroxide, dry product commodities, product diesel fuel, product weed killer and used oil. The facility operates 6 a.m. to 6 p.m. on Monday through Friday and has been in operation at this location, under various names, for more than 30 years. CSX Transportation owns the property and Transflo leases the property. Day-to-day transfer operations and equipment maintenance operations are managed by Transflo via contracted services with Arrow Material Services. Currently, Arrow Material Services employs ten people at this facility.

Transflo is a subsidiary of CSX Transportation; however, the two entities operate independently of one another. CSX owns and operates the locomotives that move the used oil and product rail cars that are loaded

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or offloaded at Transflo. Rail cars are independently owned or leased by the shipping company. The facility is on city water and has a septic tank. Mr. Jon Tines, Arrow Material Services, Terminal Manager, was present throughout the inspection. The facility consists of a rail yard, a shop area, and office space that is located on a nine acre lot.

Process Description:

Rail Yard

The facility has five loading tracks, Tracks 1 - 5 (Photos 1, 2). Track 1 is always used to receive used oil, Track 2 is used to receive product peroxide liquids, Track 3 is used to receive product diesel fuel and Tracks 4 and 5 are used to receive dry bulk products. Products typically arrive by rail and are transferred to trucks for distribution. Transflo currently accepts used oil only from Heritage Crystal Clean (HCC). HCC transports used oil in trucks to the rail yard where it is transferred into rail cars by Transflo contractor personnel. Used oil rail cars have a capacity of approximately 28,000 gallons, and they are loaded with used oil over numerous trips. To ensure the rail cars do not remain on-site longer than 35-days, Transflo notifies HCC when the rail car either approaches capacity or when day 35 is approaching. HCC is responsible for coordinating off-site shipment via CSX who arranges for the movement of the rail cars. The facility maintains a log book on-site that documents the rail car number, the date of the first off-load, the total amount off-loaded, the anticipated date of removal, and the actual date of removal. At the time of the inspection, one double-walled used oil tanker car was accumulating used oil. The tanker car was labeled with the words "Used Oil."

Secondary containment drip pans are provided beneath the rail cars to catch drips and/or spills that may occur during loading and spill kits are staged in between Tracks 1 and 2.

Shop Area

Minor maintenance on facility equipment, including pumpers and conveyors, is performed in the Shop Area. At the time of the inspection, one 55-gallon drum of used oil was accumulating. The drum was closed, properly labeled and located within secondary containment. No hazardous waste is generated in this area. All shop rags are laundered through Unifirst.

Record Review

Records reviewed included the previous three years of rail car delivery/shipping logs, personnel training records, training presentation, Used Oil Transporter/Transfer Facility registration and insurance certificates, Used Oil and Used Oil Filter Annual reports, and disposal records for used oil/oil filters generated on-site. All records reviewed appeared to be in order. The delivery/shipping logs include rail car numbers, car arrival date, shipper, date used oil was first loaded into rail car, projected release date, actual release date, and total time in the yard. Based on the facility's records, no cars had accumulated used oil on-site for greater than 35 days. Used oil generated on-site is recycled by Noble Oil Services approximately every six to twelve months.

*****NOTE: The State of Florida is in the process of adopting the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility could be impacted by the rule change.

To view the draft rule, please refer to our website at:

<https://floridadep.gov/waste/permitting-compliance-assistance/content/program-development>

Please see the eCFR site for a copy of the Federal rule at - https://www.ecfr.gov/cgi-bin/text-idx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28_02.tpl#0

The November 28, 2016 Federal Register also has a good discussion about the new requirements - <https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf>

Copies of PowerPoints that discuss the new requirements may also be found here -

<https://floridadep.gov/northeast/ne-compliance-assurance/content/compliance-assurance-resources>

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PHOTO ATTACHMENTS:

Photo 1 - Tracks 1-3



Photo 2 - Tracks 4 and 5



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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.

Note: Checklist items with shaded boxes are for informational purposes only.

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

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

04/03/2018

Date

Jon Tines

Representative Name

Terminal Manager

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:**

Cheryl L Mitchell

Inspection Approval Date:

04/03/2018