



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

April 23, 2018

Jim Rakitsky, Vice President
Quality Distribution, Inc.
102 Pickering Way, Suite 105
Exton, PA 19341
jrakitsky@qualitydistribution.com

Re: Quality Carriers Inc
EPA ID #FL000057414
Hillsborough County

Dear Mr. Rakitsky:

Department personnel conducted a routine hazardous waste compliance evaluation inspection of the above-referenced facility on March 9, 2018. Based on the information provided during and following the inspection, the facility was determined to be in compliance. 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 Ileana Hernandez at (813) 470-5945, or via e-mail at: ileana.hernandez@floridadep.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "SK", is placed above the typed name of the signatory.

Shannon Kennedy
Environmental Manager
Florida Department of Environmental Protection

Enclosure: Inspection Report

ec: Linda Eppolito, Quality Distribution, Inc., leppolit@qualitydistribution.com
John T. Wilson, Quality Distribution, Inc., jwilson@qualitydistribution.com
Mark A. Sorine, Quality Distribution, Inc., msorine@qualitydistribution.com
David Judware, Quality Carriers, djudware@qualitydistribution.com



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

FACILITY INFORMATION:

Facility Name: Quality Carriers Inc

On-Site Inspection Start Date: 03/09/2018

On-Site Inspection End Date: 03/09/2018

ME ID#: 39021

EPA ID#: FLR000057414

Facility Street Address: 7015 E Adamo Dr, Tampa, FL 33619-3423

Contact Mailing Address: 102 Pickering Way Ste 105, Exton, PA 19341

County Name: Hillsborough

Contact Phone: (813) 569-7271

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Ileana A Hernandez, Environmental Specialist II

Other Participants: Beth Knauss, Environmental Consultant; David Judware, Terminal Manager; Mark Sorine, Vice President of Risk, Safety & Security; John Wilson, Senior Vice President; Stacy Howe, Trailer Mechanic & Tank Wash Manager

LATITUDE / LONGITUDE: Lat 27° 58' 41.9855" / Long 82° 22' 47.6364"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On March 9, 2018, Quality Distribution, Inc. / Quality Carriers, Inc., d.b.a. Quality Carriers (QC), was inspected by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste rules and regulations. QC is currently registered as a hazardous waste transporter; registration expires on November 30, 2018. Mr. David Judware, QC Terminal Manager, and Mr. Stacy Howe, Trailer Mechanic & Tank Wash Manager of Howe Tank Lines, Inc. (d.b.a. Lazer Tank Lines, Inc. - an affiliated partner with QC), accompanied the Department inspectors at the 7015 E Adamo Drive location in Tampa, FL. Subsequently, Mr. Mark Sorine, Quality Distribution (QD) Vice President of Risk, Safety & Security, and Mr. John Wilson, QD Senior Vice President, General Counsel and Corporate Secretary, accompanied the Department inspectors at the 1208 Kennedy Boulevard location in Tampa, FL.

Process Description:

As an intermodal transporter of goods, hazardous materials, and hazardous waste, QC has a network of more than 100 QC-owned and affiliated terminals and facilities located throughout the U.S., Canada, and Mexico. QC primarily transports bulk shipments in stainless steel tankers. QC currently has one terminal in Florida located at 7015 E Adamo Drive in Tampa. This property is owned by Mr. Stacy Howe's brother, Mr. Mickey Howe. QC shares this terminal with two other non-affiliated businesses: South Florida Trucking, a truck and tanker maintenance company, and South Florida Tank Wash, a tanker cleaning company.

Records are kept online and are available for request through Quality Distribution, Inc., Environmental Services in Exton, PA. Records are not maintained at the Quality Distribution Headquarters located at 1208 Kennedy Boulevard in Tampa, as specified in their most recent 8700-12FL notification form submitted to the Department on December 19, 2018. However, they were provided after the inspection. During the records review, it was noted that used oil and hazardous waste have not been transported to or from any location in Florida to date. The facility's used oil and hazardous waste transporter registrations are current and proof of liability of insurance has been submitted.

Inspection Date: 03/09/2018

Conclusion:

Based on the observations made at the time of the inspection, Quality Carriers, Inc., was operating in compliance with state and federal hazardous waste rules and regulations applicable to hazardous waste transporters.

Inspection Date: 03/09/2018

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.

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

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)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> 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)			✓

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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 recalculation (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) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> 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)	✓		

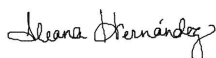
Inspection Date: 03/09/2018

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.

Ileana A Hernandez

Environmental Specialist II

Principal Inspector Name**Principal Inspector Title**

FDEP-SWD

04/23/2018

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

Beth Knauss

Environmental Consultant

Inspector Name**Inspector Title**

FDEP-SWD

Organization

John Wilson

Senior Vice President

Representative Name**Representative Title**

Quality Distribution

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.

David Judware

Terminal Manager

Representative Name**Representative Title**

Quality Carriers

Organization

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Mark Sorine

Vice President of Risk, Safety & Security

Representative Name**Representative Title**

Quality Distribution

Organization

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Stacy Howe

Representative Name

Trailer Mechanic & Tank Wash Manager

Representative Title

Lazer Tank Lines, Inc.

Organization

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Report Approvers:**Approver:**

Shannon Kennedy

Inspection Approval Date:

04/23/2018