



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

July 13, 2018

Mr. Raghu Chatrathi
CSX Transportation, Inc.
500 Water Street, J-275
Jacksonville, FL 32202
raghu_chatrathi@CSX.com

Re: **CSX Transportation, Inc.**
EPA/DEP ID: FLD 006 921 340
Duval County – Hazardous Waste

Dear Mr. Chatrathi:

Department personnel conducted a compliance inspection of the above-referenced facility on May 3, 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@floridadep.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vincent Clark".

Vincent Clark
Environmental Manager

Enclosure: Inspection Report

cc: Cheryl Mitchell - FDEP
Kim Vaughn, CSX Transportation (Kim_Vaughn@CSX.com), Mark Mullis, CSX
Transportation (Mark_Mullis@csx.com)



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

FACILITY INFORMATION:

Facility Name: CSX Transportation Inc
On-Site Inspection Start Date: 05/03/2018 **On-Site Inspection End Date:** 05/03/2018
ME ID#: 52332 **EPA ID#:** FLD006921340
Facility Street Address: 500 Water St J-275, Jacksonville, FL 32202-4423
Contact Mailing Address: 500 Water Street, J-275, Jacksonville, FL 32202
County Name: Duval **Contact Phone:** (904) 366-4174

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Mark Mullis, Manager

LATITUDE / LONGITUDE: Lat 30° 19' 28.143" / Long 81° 39' 50.6761"

SIC CODE: 4011 - Trans. & utilities - railroads, line-haul operating

TYPE OF OWNERSHIP: Private

Introduction:

CSX Transportation (CSXT) was inspected on May 3, 2018. This facility notified the Department as a Very Small Quantity Generator (VSQG) of hazardous waste, a Hazardous Waste Transporter and a Self-Transporter of Used Oil in September 2017. CSXT was last inspected by the Department's Hazardous Waste Program on May 8, 2014. CSXT is a wholly-owned subsidiary of CSX Corporation. CSXT serves the eastern U.S. and maintains a 21,000-mile railroad network. CSXT currently operates 2,400 locomotives that transport a wide variety of commodities. This facility is the headquarters for CSXT and contains mostly offices. This facility is connected to city sewer and water and has been at this location since the 1960s. Mr. Mark Mullis, Director of Environmental Field Services, was present throughout the inspection.

Process Description:

Maintenance Area and Satellite Accumulation Area

Maintenance, parts storage, and other building support activities are located in the basement of this office building. Minor equipment maintenance is performed by a CSXT crew of three people. Large projects and major maintenance and electrical work are performed by outside contractors.

In the parts storage area is an aerosol can puncture system that is attached to the top of a 55-gallon satellite accumulation drum. The liquid that accumulates in the drum is managed as D001 hazardous waste, and the empty cans are recycled as scrap metal. One 55-gallon drum was accumulating. The drum was closed and properly labeled (Photo 1). A plastic-media glove box was also located in this area but was not connected to a power source and, according to maintenance personnel, had not been used and no waste has been

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disposed of to date. The facility is aware that it should perform a hazardous waste determination in accordance with 40 CFR 262.11 on this waste stream when spent.

Spent mercury containing lamps are collected in boxes in a designated location in the basement. At the time of the inspection, there were two boxes of spent lamps accumulating (Photo 2). The containers were closed, properly labeled and had been accumulating for less than one year.

Hazardous Waste Transportation

CSXT provides hazardous waste transporter services via rail. Over the previous six years, CSXT has only transported hazardous waste in railcars for two customers, Clean Harbors (FLD 980 729 610) and Gerdau Ameristeel (FLD 083 812 537).

Used Oil Transportation

CSXT only collects used oil from maintenance of CSXT-owned equipment in its own fleet of trucks. The used oil is delivered to one of four CSXT bulk oil storage facilities in the state depending upon the maintenance location. Those facilities are located in Jacksonville, Lakeland, Tampa and Wildwood. Used oil at those facilities is managed by Noble Oil Services (NCD 986 172 476) who is registered as a Used Oil Transporter in Florida.

Record Review

CSXT is currently operating as a Very Small Quantity Generator of hazardous waste, a Hazardous Waste Transporter, and a Self-Transporter of Used Oil.

On its most recent annual transporter notification form, CSXT provided notification that it is an annual episodic Small Quantity Generator (SQG) of hazardous waste. The episodic event is due to generation of waste paint from annual maintenance activities and purging its hazardous materials inventory. When this occurs, facility personnel perform a hazardous waste determination on the waste containers and dispose of them properly. The last shipment of hazardous waste, resulting from a hazardous materials inventory cleanout, was for 338 pounds of hazardous waste on February 23, 2017, and was managed by Hulls's Environmental Service (FLR 000 195 826).

A review of the facility's disposal manifests, Contingency Plan, and personnel training records was conducted. All records reviewed appeared to be in order. The facility's Hazardous Waste Transporter and Used Oil Transporter registration and proof of insurance was available for review and current.

*****NOTE: As of June 18, 2018, the State of Florida has adopted the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility is impacted by the rule change.

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



Photo 2



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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

Inspector

Principal Inspector Name**Principal Inspector Title**

DEP

07/11/2018

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

Mark Mullis

Manager

Representative Name**Representative Title**

CSX Transportation

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:

07/11/2018