



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

September 4, 2018

Carl Ramsubhag
Manager, Investment Recovery Operations
JEA Westside Service Center
6727 Broadway Avenue
Jacksonville, Florida 32254
ramscd@jea.com

Re: JEA Westside Service Center
EPA/DEP ID: FLD 981 027 279
Duval County – Hazardous Waste

Dear Mr. Ramsubhag:

Department personnel conducted a compliance inspection of the above-referenced facility on June 8, 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 and any non-compliance items which may have been identified at the time of the inspection have been corrected.

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 L. Mitchell of the Northeast District Office at 904-256-1620 or via e-mail at cheryl.l.mitchell@FloridaDEP.gov.

Sincerely,

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

Heather Webber
Environmental Administrator

Enclosure: Inspection Report

Cc: Matt McClure, JEA (mcmlmr@jea.com); Branden Schumacher, JEA (schubj@jea.com);
Jaclyn Taricska, JEA (tarijm@jea.com)



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

FACILITY INFORMATION:

Facility Name: JEA Westside Service Center

On-Site Inspection Start Date: 06/08/2018

On-Site Inspection End Date: 06/08/2018

ME ID#: 50530

EPA ID#: FLD981027279

Facility Street Address: 6727 Broadway Ave, Jacksonville, FL 32254-2715

Contact Mailing Address: 21 West Church Street, Jacksonville, FL 32202

County Name: Duval

Contact Phone: (904) 665-4243

NOTIFIED AS:

SQG (100-1000 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transfer Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Brandon Schumacher, Transformer Shop Foreman

LATITUDE / LONGITUDE: Lat 30° 19' 57.7489" / Long 81° 45' 27.5675"

SIC CODE: 7629 - Services - electrical repair shops, nec

TYPE OF OWNERSHIP: Private

Introduction:

JEA Westside Service Center (JEA) was inspected on June 8, 2018. A follow-up site visit was also conducted on June 26, 2018, for records review. JEA was last inspected by the Department's Hazardous Waste Program on June 12, 2014. Branden Schumacher, JEA Transformer Shop Foreman, participated throughout the inspection and the site visit. JEA's Matthew McClure, Jaclyn Vu and Chad Yeager participated during the site visit.

JEA is a registered Used Oil Transporter/Transfer facility and a Small Quantity Generator (SQG) of hazardous waste. JEA only transports its own used oil and used oil filters, generated at its own noncontiguous facilities, to this central collection facility. Because JEA only transports its own oil, it is exempt from the used oil transporter certification program requirements in 62-710.600, FAC. Because JEA only transports its own used oil filters in its own vehicles, it is exempt from the used oil filter registration and reporting requirements of 62-710.850(3), FAC. The facility has been assigned the EPA ID number FLD 981 027 279. Please use this number on all correspondence with the Department's Hazardous Waste Program.

JEA is a municipal electric utility and operates a maintenance facility at this location for its electrical utility equipment. JEA has been at this location since 1985 and is connected to city water and sewer. Approximately 200 employees work at this facility which operates Monday through Friday 6:30 AM to 3:30 PM. A smaller emergency services crew works Saturday and Sunday from 6:30 AM to 3:30 PM. The facility consists of administrative offices, parts and supplies storage building, vehicle storage buildings, electrical pole laydown area, Hazmat Building, Transformer Shop, Glove Test Lab, 90-Day Hazardous Waste Accumulation Area and Outside Areas. The areas inspected are described below.

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Process Description:

HAZMAT BUILDING

This building is divided into two sections by a north-south driveway that is used by utility trucks to offload transformers and miscellaneous electrical equipment pending repairs or final disposition. The two sections are constructed approximately 12" above the driveway, are curbed to provide secondary containment and are sealed with an oil-impermeable coating. JEA's John Whitten participated during the inspection of the Hazmat Building.

Transformers collected from the field and other JEA facilities are brought to this building to determine whether they can be reused and to sample the oil inside the unit. If transformers in the field are leaking, they are placed inside a plastic containment tarp during transport and then placed in metal drip pans inside this building (Photo 1) until they can be inspected and the oil can be sampled. The transformer oil is sampled to determine the polychlorinated biphenyl (PCB) concentration in the oil. PCB concentrations in oil above certain levels are prohibited.

If the oil sample comes back "hot" (i.e., PCB concentration >45 ppm), the transformer is placed in another section of the building until it can be shipped to TCI in Alabama (ALD 983 167 891) as PCB-contaminated waste which is regulated under the Toxic Substance Control Act (TSCA). If the oil in a leaking transformer is determined to be "hot," the oil is drained and containerized in 55-gallon drums to be shipped-off site as a TSCA-regulated waste. The drained transformer is also shipped to TCI.

If the oil concentration is >2 ppm and <45 ppm, and the transformer can be reused, the oil is drained and stored in one of three used oil storage tanks located on the north end of the building, and the transformer is taken to the Transformer Shop, described below, to be repaired and put back into service. If the transformer cannot be reused, the oil is drained into one of the three used oil storage tanks, and the drained transformer is shipped to TCI. There are two 3,000 gallon tanks and one 8,000 gallon tank that are used to store the drained used oil until the oil can be offered for sale as used oil. Mr. Schumacher stated that these sales usually occur once per year. The used oil storage tanks are located within a curbed section of the building that provides secondary containment for the tanks. An oil-impermeable coating is on the floor and curbing.

The facility also generates non-PCB used oil and used oil filters from maintenance of equipment at this and other JEA facilities. These wastes are transported back to this facility and stored in 55-gallon drums on the east side of the building. There were numerous drums of used oil and used oil filters accumulating at the time of the inspection (Photos 2 and 3), and all of the drums were properly labeled. The building provides secondary containment.

On the west side of the building is a bulb crusher that is used for spent fluorescent tubes and other types of used bulbs that are collected from the field. The crusher is attached to the top of a 55-gallon satellite accumulation drum. The bulb crusher and the drum were closed, and the drum was properly labeled. There are steps and a platform in front of the crusher for access to the top of the crusher where the bulbs are fed into the unit. Several pieces of broken bulbs were observed on the platform that the facility had not cleaned-up (Photo 4) [40 CFR 273.13(d)(2)]. Bulbs waiting to be crushed are contained in cardboard boxes or 55-gallon drums until they can be crushed. At the time of the inspection, there were five boxes and two 55-gallon drums of universal waste bulbs accumulating. The containers were closed and properly labeled and had been accumulating for less than one year.

Adjacent to the bulb crusher is the facility's aerosol can puncturer that is attached to the top of a 55-gallon satellite accumulation drum (Photo 5). The drum was closed and properly labeled. Once punctured and drained, the empty cans are collected in an adjacent 55-gallon drum and recycled as scrap metal. The facility recently began generating this wastestream and had not yet accumulated enough waste to require disposal. Mr. Schumacher stated that a waste determination will be made for this wastestream prior to disposal.

TRANSFORMER SHOP

In this shop, transformers are dielectrically tested and minor surface repairs for corrosion prevention and paint touch-up are performed. A review of paint SDSs reveals no RCRA metals and flashpoints of <140°F. The facility cleans its paint guns with mineral spirits. Waste paint and mineral spirits from paint gun cleaning are placed into a 55-gallon satellite accumulation container. The satellite accumulation container was closed and

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properly labeled (Photo 6). Waste paint and waste mineral spirits are managed as D001 hazardous waste liquids. The shop processes generate approximately two to three gallons of waste paint and mineral spirits per month. Solid wastes generated during this painting and cleaning process are non-hazardous, but the facility manages the paint related material waste as D001/F003/F005 hazardous waste. These solid wastes are placed into a dated accumulation container for D001/F003/F005 paint related material waste located in the <90-Day Hazardous Waste Accumulation Area (HWAA) described below.

The facility has one walk-in paint booth (Photo 7) in this shop that is used for the transformers that require more than touch-up painting. Due to a recent process change related to the condition of transformers that are eligible to be returned to service, JEA is using the booth less frequently. The same type of paint is used in the paint booth as the light touch-up paint. The paint booth filters have not reached the end of their use and therefore have not required disposal. Mr. Schumacher stated that a waste determination will be made for this wastestream prior to disposal.

GLOVE TEST LAB

Gloves used by electricians have to be tested periodically to ensure they meet specifications. Once the gloves are tested, the date has to be written on them. Over time, the date marks build-up on the glove and need to be removed. The facility uses a rag with Allied Quick Rubber Rejuvenator (30-40% toluene and 20-30% acetone and methanol) to clean the gloves. Spent rags with Rubber Rejuvenator are an F005 hazardous waste. Spent rags are placed into a 5-gallon satellite accumulation container in the area (Photo 8). The container was closed and properly labeled. When the container is full, the technician empties the satellite container into a dated hazardous waste accumulation container for D001/F003/F005 paint related materials located in the 90-Day HWAA described below.

90-DAY WASTE ACCUMULATION AREA (HWAA)

The HWAA is located on the east side of the Hazmat Building described above. In addition to the wastestreams generated at this facility, JEA also generates various spent materials while performing maintenance at its electrical substations and utility sites. These spent materials are brought back to this location where facility personnel will make a hazardous waste determination and properly manage any non-useable materials as required. At the time of the inspection, there were no spent materials pending waste determination and no hazardous waste containers were observed. Spill kits, safety and decontamination equipment were available, and "No Smoking" signs had been posted in the area.

OUTSIDE AREAS

Used Oil Storage Tank:

This 5,200-gallon tank is located east of the Glove Test Lab, adjacent to one of the Vehicle Storage buildings. It is used to store oil that has been tested and removed from transformers in the field because the transformer did not have to be brought to this facility for additional repair. A tanker truck is used to remove the oil from the transformer, and the oil is transferred to this tank until it can be offered for sale as used oil.

Scrap Metal Storage:

This area is located in the northwestern corner of the property. The area consists of several bays separated by concrete walls where each bay is used to store different types of scrap metal until it can be recycled. At the time of the inspection, numerous light fixtures, with and without bulbs, were observed in the scrap metal storage area (Photos 9-11). A few of the bulbs were broken, and glass was observed on the pavement. As a result, the facility failed to manage universal waste lamps in a way that prevents breakage and/or releases of their components to the environment [62-737.400(5), FAC].

RECORDS REVIEW

The facility initially notified the Department that it was a Small Quantity Generator (SQG) of hazardous waste on February 29, 2016. JEA wants to remain a SQG due to periodic maintenance events in the field that generate SQG amounts of D001 liquid paint waste and D001/F003/F005 solid paint related materials. In addition to these wastestreams, the facility routinely generates the following hazardous waste streams: D001 waste aerosols cans and universal waste crushed mercury lamps.

Records reviewed included hazardous waste manifests, shipping papers, inspection logs, annual Used Oil

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Transporter registration, insurance liability coverage, personnel training records and the Contingency Plan. Records reviewed appeared to be in order.

JEA issues multi-year contracts for waste disposal services. The current vendors who dispose of the facility's hazardous waste are Cliff Berry (FLR 000 830 071), EQ of Florida (FLD 981 932 494) and EQ Industrial (MIK 435 642 742). AERC Com (FLD 984 262 782) manages the facility's universal waste crushed bulbs; Trademark Recycling manages the facility's scrap metal. JEA typically has two to three hazardous waste and universal waste shipments each year. The last hazardous waste disposal was on May 24, 2018. Ninety pounds of hazardous waste including D001 flammable liquids, D001 waste aerosol cans and 1,200 pounds of universal waste crushed bulbs were shipped off-site.

*****NOTE: As of June 18, 2018, the State of Florida 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>

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.13(d)(2)
Explanation:	The facility failed to clean-up broken pieces of universal waste bulbs on the platform adjacent to the universal waste bulb crusher.
Corrective Action:	No further action is required. The facility had cleaned-up the broken pieces prior to the site visit on June 26, 2018.

Type:	Violation
Rule:	62-737.400(5)
Explanation:	The facility failed to manage scrap metal light fixtures that contained universal waste bulbs in a manner that prevented breakage and a release to the environment.
Corrective Action:	No further action is required. The facility returned to compliance via email correspondence on August 7, 2018, and August 13, 2018.

PHOTO ATTACHMENTS:

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Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



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Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



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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

08/16/2018

Date

Brandon Schumacher

Representative Name

Transformer Shop Foreman

Representative Title

JEA

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:

08/16/2018