

From: Glorioso, Vinnie
To: [Mitchell, Cheryl L](#)
Cc: [Decina, Anita](#); [Falls, Kevin](#)
Subject: RE: HCC Jacksonville FDEP inspection follow up request
Date: Thursday, August 30, 2018 9:18:16 AM
Attachments: [Kevin Falls Sampling 101 certificate of completion 12-2-15.pdf](#)
[Sampling Supplies.pdf](#)
[Sampling Procedures.pdf](#)
[TCLP Branch Debris Non haz Jacksonville 2018.pdf](#)

Cheryl,

Answers below:

1. On the COC, there are several different dates that appear related to dates of container shipping, sample collection, and lab sampling. Please explain the timeline and process for collecting this sample. Kevin Falls collected a one quart representative sample on 7/23/18 at 800 AM EST at HCC Jacksonville, FL branch. The sample contained branch non-hazardous oily waste (i.e. gloves, absorbent pads, etc). The sample was put into a larger 1-2 gallon container on ice with four zip ties and mailed overnight to the Pace New Orleans lab which was received 7/24/18.
2. Please explain the relationship between Pace Indianapolis and Pace New Orleans. The latter Pace is the Florida registered NELAP lab, yet the final report is provided on Pace Indianapolis letterhead and signed by the lab manager in Indianapolis. Pace Indy does the reporting but Pace New Orleans did the analysis. The report shown is a short report and can be modified to include more information.
3. The COC is difficult to read - please provide the name of the sampler and the person that received the sample in New Orleans. Kevin Falls was the sampler. Jerry Miller is the person that received the sample in Pace New Orleans.
4. Please provide the type of training that the sampler has obtained and the date it was given. Kevin Falls received training from Don Pennell, (Manager, Field Regulatory Compliance and Sales Training) on how to collect samples. See attached training certificate and sampling supplies and sampling procedures covered in the course.
5. On the COC, I did note that in the "Sample Conditions" section the lab noted that the temp was 26.5°C which is unacceptable for performing this test method and does not meet Florida Guidelines for Field Sampling or QA. Please explain your protocol for situations where this occurs. The sample was sent with blue ice that did not cool the sample down to the required <6 degrees C temperature. We understand the sampling did not meet the FL requirements for temperature, but we don't believe the outcome would be different.

Vinnie N. Glorioso, CSP, CHMM
Regional Manager- Environmental, Health and Safety
Heritage-Crystal Clean, LLC
6305 E. Lombard Street, Baltimore, MD 21224
443-463-1598

From: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Sent: Thursday, August 23, 2018 2:36 PM

To: Glorioso, Vinnie <vinnie.glorioso@Crystal-Clean.com>; Decina, Anita <Anita.Decina@Crystal-Clean.com>

Cc: Fellabaum, Pamela <Pamela.Fellabaum@FloridaDEP.gov>

Subject: RE: HCC Jacksonville FDEP inspection follow up request

My apologies for the delayed response – I was on unplanned leave from Monday through Wednesday but back in the office now.

My questions on the lab report as follows:

1. On the COC, there are several different dates that appear related to dates of container shipping, sample collection, and lab sampling. Please explain the timeline and process for collecting this sample.
2. Please explain the relationship between Pace Indianapolis and Pace New Orleans. The latter Pace is the Florida registered NELAP lab, yet the final report is provided on Pace Indianapolis letterhead and signed by the lab manager in Indianapolis.
3. The COC is difficult to read - please provide the name of the sampler and the person that received the sample in New Orleans.
4. Please provide the type of training that the sampler has obtained and the date it was given.
5. On the COC, I did note that in the "Sample Conditions" section the lab noted that the temp was 26.5°C which is unacceptable for performing this test method and does not meet Florida Guidelines for Field Sampling or QA. Please explain your protocol for situations where this occurs.

I can set-up a phone bridge for a conference call tomorrow or next week, just let me know. Thank you,

r/
Cheryl

From: Glorioso, Vinnie [<mailto:Vinnie.Glorioso@Crystal-Clean.com>]

Sent: Friday, August 17, 2018 4:11 PM

To: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>

Cc: Decina, Anita <Anita.Decina@Crystal-Clean.com>

Subject: RE: HCC Jacksonville FDEP inspection follow up request

Cheryl,

Could you let us know what your questions are with the lab report so we can look into it and be prepared for the phone call?

Anita had our branch manager Kevin Falls, pull the branch generated waste sample and it was sent to the Pace, New Orleans lab, that should have the FL certifications.

I was out of the office for a significant portion this week and will be on vacation next week. Thanks

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From: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Sent: Wednesday, August 15, 2018 3:00 PM
To: Glorioso, Vinnie <vinnie.glorioso@Crystal-Clean.com>; Decina, Anita <Anita.Decina@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection follow up request

Vinnie, Anita – I have a few questions on the lab report that Anita may be able to help me with. I had received her out of office last week but wanted to see if she is back in this week. If so, I would like to set-up a time for one of us to call the other to discuss the report.

Anita - Please let me know your availability over the next couple days and even early next week. I am available anytime tomorrow, Friday or Monday after 10. Thank you,

r/
Cheryl
904-256-1620

From: Mitchell, Cheryl L
Sent: Wednesday, August 8, 2018 4:11 PM
To: 'Glorioso, Vinnie' <Vinnie.Glorioso@Crystal-Clean.com>
Cc: Decina, Anita <Anita.Decina@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection follow up request

Thanks Vinnie. That's all I need for now.

r/
Cheryl

From: Glorioso, Vinnie [<mailto:Vinnie.Glorioso@Crystal-Clean.com>]
Sent: Friday, August 3, 2018 12:11 PM
To: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Cc: Decina, Anita <Anita.Decina@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection follow up request

Cheryl,

Our branch debris drum analytical came back non-hazardous (see attached TCLP).

Please confirm if you need any other information to close out the Jacksonville inspection. Thanks

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From: Glorioso, Vinnie
Sent: Thursday, July 19, 2018 3:49 PM
To: 'Mitchell, Cheryl L' <Cheryl.L.Mitchell@FloridaDEP.gov>
Cc: Decina, Anita <Anita.Decina@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection follow up request

Cheryl,

See below in red. I copied Anita Decina, EHS VP in case she has anything to add. Thanks

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From: Mitchell, Cheryl L [<mailto:Cheryl.L.Mitchell@FloridaDEP.gov>]
Sent: Monday, July 09, 2018 7:22 PM
To: Glorioso, Vinnie <Vinnie.Glorioso@Crystal-Clean.com>
Cc: Falls, Kevin <Kevin.Falls@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection email 4

Vinnie – I believe the only items we need clarification/information on are listed below.

1. Used Oil (UO) and Used Oil Filter (UOF) log or equivalent information (DEP form previously sent) [reg 40 CFR 279.46; 62-710.510(1), Florida Administrative Code (FAC)]; **HCC track used oil and used oil filter log in CCMS (Crystal Clean Management System) program. Cheryl, if you need some data on this, I will need Anita to give me some help in CCMS.**
2. How is HCC's waste stream "Branch Debris" managed/treated? [40 CFR 279.47]
Branch debris (gloves, oil pads, absorbent, etc.) goes in a 55-gallon drum as non-hazardous waste and is shipped to the Atlanta hub, which will then be sent to a TSDF.
3. Contingency Plan and arrangements made with local emergency response authorities [40 CFR 265.50-.56] **In 2015 we submitted contingency plan to local emergency response agencies, but the agencies did not submit arrangement back to us. Attached are those submissions and**

our current contingency plan that was submitted with the 2017 CY tier II reports online to the FL tier II website for emergency responders. Attached are those submissions and our current contingency plan that was submitted with the tier II reports online to the FL tier II website for emergency responders.

4. Do the labs that HCC uses for waste sampling have NELAP/DOH certification by State of Florida? [62-160.300, FAC] **We have used Pace in New Orleans with the FL certification.**
5. How is VSQG waste managed after it arrives in Atlanta? **The HCC Atlanta hub operates also as a 10-day hazardous waste transfer facility. Any hazardous waste drums are re-organized depending on the waste type and then shipped to a Treatment, Storage, and Disposal Facility (TSDF).**

I'm in the office all week except Thursday and we can discuss these in a phone call as needed. Just let me know a few available dates/times so I can try and get Pam on the call too. Thanks!

r/
Cheryl

From: Glorioso, Vinnie [<mailto:Vinnie.Glorioso@Crystal-Clean.com>]
Sent: Thursday, July 5, 2018 1:17 PM
To: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Subject: RE: HCC Jacksonville FDEP inspection email 4

Cheryl,

Can you please compile a list of items that we need to clarify or further explain as a result of the Jacksonville inspection? Thanks

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From: Mitchell, Cheryl L [<mailto:Cheryl.L.Mitchell@FloridaDEP.gov>]
Sent: Thursday, June 07, 2018 3:34 PM
To: Glorioso, Vinnie <Vinnie.Glorioso@Crystal-Clean.com>
Cc: Falls, Kevin <Kevin.Falls@Crystal-Clean.com>
Subject: RE: HCC Jacksonville FDEP inspection email 4

Vinnie – I am getting all your emails (up to #4 with this one) and I didn't want you to worry about a lack of response from me. I'm sorting through them slowly and if I have any questions I'll send you all an email to set-up a conference call either the end of next week or the week of the 18th. Thank you,

r/
Cheryl

From: Glorioso, Vinnie <Vinnie.Glorioso@Crystal-Clean.com>
Sent: Tuesday, June 5, 2018 3:36 PM
To: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Cc: Falls, Kevin <Kevin.Falls@Crystal-Clean.com>
Subject: HCC Jacksonville FDEP inspection email 4

Cheryl,

Here is some information about our halogen screening procedures you requested.

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