



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

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC
On-Site Inspection Start Date: 02/26/2019 **On-Site Inspection End Date:** 02/26/2019
ME ID#: 28736 **EPA ID#:** FLD984262410
Facility Street Address: 1280 NE 48th St, Pompano Beach, FL 33064-4909
Contact Mailing Address: 6305 E Lombard St, Baltimore, MD 21224-1734
County Name: Broward **Contact Phone:** (443) 463-1598

NOTIFIED AS:

Transfer Facility
Transporter
Used Oil
VSQG

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Alannah Irwin, Inspector
Other Participants: Julie Walker, Branch Admin

LATITUDE / LONGITUDE: Lat 26° 17' 22.5635" / Long 80° 6' 23.2854"

SIC CODE: 5093 - Wholesale trade - scrap and waste materials

TYPE OF OWNERSHIP: Private

Introduction:

On February 26, 2019, a compliance evaluation inspection (CEI) was conducted for Heritage Crystal-Clean, LLC - Pompano (HCC) by Alannah Irwin with the Florida Department of Environmental Protection (DEP). The inspection was conducted to determine compliance with the Closure Assessment Report for Used Oil Processing (UOP) activities. This report was submitted to DEP on 1/22/2019. The inspector was accompanied by Julie Walker, Branch Admin, from HCC.

Operations commenced in 1994 under FCC Environmental, Inc. (FCC). HCC acquired FCC in June of 2015 and has ceased most services out of this site. Previously, HCC was permitted as a UOP under permit number 51348-009-HO/51348-010-SO. This permit expired on 10/21/2018; however, UOP operations at this site were suspended in January of 2018. Additionally, HCC is registered as transporter, transfer facility, and marketer for used oil and used oil filters, as well as a hazardous waste transporter and transfer facility. HCC is also small quantity handler of universal waste and a registered universal waste transporter. The facility is currently registered as used oil handler with the Department effective on 6/30/2018.

HCC is located on a four (4) acre property in Broward County and is connected to city water and sewer. There are currently twelve (12) employees at this location.

Notification History:

Current registration last updated: 2/26/2019 - this new registration is currently effective from 6/30/2019 to 6/30/2020.

Last notification as a Hazardous Waste and Used Oil Transfer facility, transporter and Used Oil Processor - 6/30/2018 to 6/30/2019

Inspection History:

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6/7/2018 - A CEI was conducted by the Department. The facility was found to be out of compliance at the time of inspection for failure to provide final signed copies of manifests to the generators, using a "Bill of Lading" for small quantity generators (SQGs) of hazardous waste, failure to maintain an SPCC and the EPA ID number for receiving facility of used oil transported by HCC, failure to maintain weekly container inspection logs, and to notify the local authorities of the arrangements with the local police, fire department, hospital, and emergency responders. These violations were corrected and resolved via a Short Form Consent Order. 2/11/2016 - HCC was inspected by the Department and three (3) violations were observed. The violations were resolved without formal enforcement action on 4/6/2016.

Steel-toed boots and hard hats are the only personal protective equipment (PPE) required to enter the facility.

Process Description:

A Closure Plan was submitted to the Department on 8/17/2017 and was approved on 10/11/2017. According to the Closure Plan, HCC will only operate one (1) used oil processing facility located in Plant City (EPAID FLD984262410). Since the last inspection, HCC has completed all of the proposed actions in the closure plan and submitted a Closure Assessment Report on 1/22/2019.

Prior to removal, HCC had a tank farm with a total capacity of 432,000 gallons. During the last inspection on 6/7/2018, the tanks were still on-site due to ongoing conflicts between HCC and the previous property owners. Based on the walkthrough, the lot where UOP activities were conducted is no longer occupied.

During the inspection, it was confirmed that all tanks and associated equipment have been removed from the site. According to the facility, the tank farms and associated wastewater treatment plant were removed in August of 2018 prior to the acquisition of the new property owners, IPT Industrial (also known as "Black Forest"). The facility and new property owners have agreed to a ten (10) year lease; the area in which UOP activities were performed will be demolished to construct new warehouses. HCC will continue to conduct hazardous waste and used oil transport and transfer activities from this location.

Records Review:

> Groundwater Sampling

Based on the Closure Assessment Report, groundwater sampling was conducted at four (4) locations around the property in accordance with DEP's Standard Operating Procedure for Field Activities (DEP-SOP 001/01). The groundwater sampling was performed from 9/26/2018 for the temporary wells and on 10/3/2018 for the permanent wells. The laboratory analytical results indicated that all petroleum-related constituents were below the state groundwater cleanup target levels (GCTLs) established in Rule 62-777, Florida Administrative Code (F.A.C.).

> Soil Sampling

Sixteen (6) soil borings were taken around the facility from 9/24/2018 - 9/26/2018, in accordance with the closure plan. Soil samples were collected at each boring in one-foot intervals and were contained in glass jars. The samples were tested on-site using a field calibrated organic vapor analyzer (OVA) equipped with a flame ionization detector (FID). Soil samples were submitted under chain of Custody from Enco Laboratories, Inc., in accordance with Rule 62-780, F.A.C., Table D. Based on the OVA-FID results and the laboratory analyses, all petroleum-related constituents were below the state soil cleanup target levels (SCTLs) established in Rule 62-777, F.A.C.

> Tank Removal

Manifest records from the tank farm and residual waste removal were included in the Closure Assessment Report. Waste analyses were performed on the residual material prior to disposal.

>> Manifest No. 011075875FLE - picked up on 8/1/2018 by Clean Harbors Environmental Services (EPAID MAD039322250). Wastes were transported to Clean Harbors Florida (EPAID FLD980729610) on 8/2/2018

- One (1) plastic drum (DF, 6.0 pounds, 2.7 kilograms) of waste carbon disulfide exhibiting a hazardous waste characteristic for ignitability (D001), a hazardous waste characteristic for reactivity (D003), and is listed as an acutely toxic hazardous waste (P022).

- One (1) plastic drum (DF, 40.0 pounds, 18.1 kilograms) of waste flammable liquids contaminated with hexane (sophoronediamine) exhibiting a hazardous waste characteristic for ignitability (D001) and a hazardous waste characteristic of toxicity for MEK (D035). The waste is also listed as a hazardous waste discarded from a commercial chemical product for cyclohexane (U057).

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- One (1) plastic drum (DF, 6.0 pounds, 2.7 kilograms) of waste activated carbon exhibiting a hazardous waste characteristic for ignitability (D001) and a hazardous waste characteristic for reactivity (D003).
 - One (1) plastic drum (DF, 2.0 pounds, 0.9 kilograms) of waste potassium persulfate exhibiting a hazardous waste characteristic for ignitability (D001).
 - One (1) plastic drum (DF, 2.0 pounds, 0.9 kilograms) of waste inorganic cyanides exhibiting a hazardous waste characteristic for reactivity (D003).
 - One (1) plastic drum (DF, 9.0 pounds, 4.1 kilograms) of waste chloroform listed as a hazardous waste discarded from a commercial chemical product (U044)
 - One (1) plastic drum (DF, 50.0 pounds, 22.7 kilograms) of waste inorganic and acidic corrosive liquid exhibiting a hazardous waste characteristic for corrosivity (D002).
 - One (1) plastic drum (DF, 4.0 pounds, 1.8 kilograms) of waste nitric acid with a concentration between 65% and 70% exhibiting a hazardous waste characteristic for ignitability (D001) and corrosivity (D002).
 - One (1) plastic drum (DF, 180 pounds, 81.6 kilograms) of waste sodium hydroxide and sodium metasilicate exhibiting a hazardous waste characteristic for corrosivity (D002).
 - One (1) drum (DM, 300.0 pounds, 136.1 kilograms) of waste acetic acid solution with a concentration between 50% and 80% exhibiting a hazardous waste characteristic for corrosivity (D002).
- The tanks were RCRA-emptied and managed as scrap metal.

>> Manifest No. 011075877FLE - picked up on 8/1/2018 by Clean Harbors Environmental Services (EPAID MAD039322250). Wastes were transported to Clean Harbors Florida (EPAID FLD980729610) on 8/2/2018

- One (1) carton (CF, 400.0 pounds, 181.4 kilograms) of waste paint-related materials exhibiting a hazardous waste characteristic for ignitability (D001), and a hazardous waste characteristic for toxicity for barium, chromium, lead, and MEK (EPA waste codes D005, D007, D008, and D035, respectively). The waste is also listed as a spent solvent hazardous waste (F003).
- One (1) plastic drum (DF, 25.0 pounds, 11.3 kilograms) of waste sulfuric and chromic acid exhibiting a hazardous waste characteristic of corrosivity (D002) and a hazardous waste characteristic of toxicity for chromium and silver (D007 and D011, respectively).
- Five (5) plastic containers (CF, 2000.0 pounds, 907.2 kilograms) of waste hypochlorite solution exhibiting a hazardous waste characteristic for corrosivity (D002).

The facility also provided manifests for an additional cleanout performed in April of 2018.

Based on the review of the manifests from the tank farm removal in August 2018, the facility experienced a planned episodic event, as defined in 40 CFR 262.231.

Per 40 CFR 262.232(a)(1), a very small quantity generator (VSQG) is limited to one (1) episodic event per calendar year, unless a petition is granted under 40 CFR 262.233. Additionally, a VSQG is required to submit a notification to the Department using the 8700-12 Federal notification form no later than thirty (30) days prior to the planned episodic event, in accordance with 40 CFR 262.232(a)(2). The facility did not submit the required for prior to initiating the tank cleanout in August of 2018; however, the facility was compliant with the episodic waste management and manifest requirements outlined in 40 CFR 262.232(a)(4)-(7) during the cleanouts. Compliance Assistance was provided to avoid any future episodic events without notification to the Department.

PHOTO ATTACHMENTS:

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Building Front



Previous Location of Tank Farm



Conclusion:

Based on the inspection, HCC was inspected as a UOP and was found to be in compliance with the Closure Plan and Closure Assessment Report. Contamination as a result of UOP activities were below the GCTLs and SCTLs. The Division of Waste Management will be issuing the final letter addressing the Closure Assessment Report.

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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? 262.18(a)	✓		
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.

Alannah Irwin

Principal Inspector Name**Principal Inspector Signature**

Inspector

Principal Inspector Title

DEP

Organization

03/08/2019

Date

Julie Walker

Representative Name

Branch Admin

Representative Title

HCC Pompano

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:**

Norva Blandin

Inspection Approval Date:

03/08/2019