FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

April 3, 2019

Heritage-Crystal Clean
Attn: Adam Mefferd, Branch Manager
9940 Currie Davis Drive, STE A44
Tampa, Florida 33619-2669
Adam.Mefferd@Crystal-Clean.com

Re: Heritage-Crystal Clean
FLR000170431
Hillsborough County

Dear Mr. Mefferd:

Department personnel conducted a compliance inspection of the above-referenced facility on 3/07/2019. Based on the information provided during 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 Jamie Arleo at 813/470-5923, or via e-mail at: Jamie.Arleo@FloridaDEP.gov .

Sincerely,

Shannon Kennedy
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

Enclosures: Inspection Report

cc: Shannon.Kennedy@FloridaDEP.gov
Jamie.Arleo@FloridaDEP.gov
Gerry Javier, Hillsborough County EPC, Javier@epchc.org

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Heritage-Crystal Clean LLC

On-Site Inspection Start Date: 03/07/2019 **On-Site Inspection End Date:** 03/07/2019

ME ID#: 95762 **EPA ID#:** FLR000170431

Facility Street Address: 9940 Currie Davis Dr #A44, Tampa, FL 33619-2669

Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, IL 60123

County Name: Hillsborough **Contact Phone:** (847) 783-5355

NOTIFIED AS:

Non-Handler

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for Used Oil Transfer Facility facility
Routine Inspection for Hazardous Waste Transfer Facility facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jamie Arleo, Inspector

Other Participants: Adam Mefferd, Branch Manager

LATITUDE / LONGITUDE: Lat 27° 57' 4.3165" / Long 82° 20' 27.7981"

NAIC 488999 - All Other Support Activities for Transportation

TYPE OF OWNERSHIP: Private

Introduction:

- Heritage Crystal Clean LLC (HCC) was inspected on March 7, 2019 to determine the facility's compliance with state and federal hazardous waste regulations.
- Mr. Adam Mefferd accompanied the inspector throughout the inspection.
- The facility was last inspected by the Department on February 25, 2016.
- The facility is notified/registered as a non-handler of hazardous waste, a UW lamp and device transfer facility, a HW transporter, a HW transfer facility, a used oil transporter, a used oil transfer facility, a used oil filter transporter, and a used oil filter transfer facility. The most recent notification was received in March 2019.
- No transportation is conducted under this EPA ID #. All hazardous waste and used oil will be transported using Heritage-Crystal Clean's national transporter EPA ID number ILR000130062. In addition, all "on-spec" fuel oil will be marketed under the same EPA ID number ILR000130062.

Process Description:

- Crystal Clean primarily manages drummed waste and services parts washers for customers in the Tampa Bay area.

- The facility consists of an office (recently renovated), warehouse, semi-truck trailers, and box trucks used for pickups.

- Outbound wastes are stored in one trailer while inbound products are stored in a second trailer. Waste materials are not currently stored in the warehouse. Approximately twice each week, outbound waste is transported to their Atlanta facility.

- All inbound waste is transferred directly from the box trucks to the semi-truck trailer for storage.

- “Danger – Do not Enter” and “No Smoking” signs were observed at the facility in the appropriate locations. A security chain was also present at the top of the stairs in front of the facility. Security cameras were located through the building.

- An emergency contact list was visible and reviewed.

- The Department reviewed several months of inbound and outbound manifests/receipts, inspection logs (digital) and the contingency plan during the inspection. Approximately seven years of manifests/receipts are kept electronically.

- All inbound and outbound waste is tracked using a barcoding system. A bill of lading with a barcode is attached to each container.

- The Department inspected the waste containers in both the inbound and outbound semi-truck trailers. All containers were labeled properly. All transport vehicles had spill kits.

- The facility would hire NRC Environmental Services or Hull’s Environmental for all spill response. Spill response kits were also located throughout the facility.

- The warehouse held new product and parts washers for their clients. Most of the parts washers now use a proprietary surfactant blend that is not a hazardous material. The Department received Safety Data Sheets for several degreasers by email from Heritage-Crystal Clean.

- The Fire Marshall inspects the facility several times each year.

- The facility was not currently storing any spent fluorescent lamps. The only hazardous waste generated in the warehouse during normal operations is contaminated sampling media (jars and glass rods).

- All used oil is managed at the Plant City location.

- The Department later reviewed the training records for all employees at the facility. An Excel Spreadsheet was generated by their training program and emailed to the inspector. The training included the following: fit testing, emergency response, hazard communication, and PPE with respiratory.

PHOTO ATTACHMENTS:

Photo 2



Photo 3



Conclusion:

At the time of the inspection, HCC was found to be in compliance with rules applicable to hazardous waste transporters and transfer facilities.

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	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) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - VSQG 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)	✓		
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)	✓		
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)			✓

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 recalmation (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) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ 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)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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.

Jamie Arleo	Inspector	
Principal Inspector Name	**Principal Inspector Title**	
Jamie Arleo	DEP	03/27/2019
Principal Inspector Signature	**Organization**	**Date**

Adam Mefferd	Branch Manager
Representative Name	**Representative Title**
	Heritage-Crystal Clean
	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: Shannon Kennedy **Inspection Approval Date:** 03/27/2019