



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

June 13, 2019

Mr. Wes Pace, Hazardous Materials Compliance Director  
Landstar Transportation Logistics, Inc.  
13410 Sutton Park Driver South  
Jacksonville, FL 32224  
[wpace@landstar.com](mailto:wpace@landstar.com)

Re: **Landstar Ligon, Inc.**  
**EPA/DEP ID FLR 000 099 937**  
**Duval County – Hazardous Waste**

Dear Mr. Pace:

Department personnel conducted a compliance inspection of the above-referenced facility on April 30, 2019. Based on the information provided during the inspection and after 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 Ms. Cheryl L. Mitchell at 904-256-1620 or via e-mail at [cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov).

Sincerely,

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

Heather Webber  
Environmental Administrator

Enclosure: Inspection Report

Ec: DEP Internal: Heather Webber, Pam Fellabaum, Cheryl Mitchell



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

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**FACILITY INFORMATION:**

**Facility Name:** Landstar Ligon Inc

**On-Site Inspection Start Date:** 04/30/2019

**On-Site Inspection End Date:** 04/30/2019

**ME ID#:** 46643

**EPA ID#:** FLR000099937

**Facility Street Address:** 13410 Sutton Park Dr S # D, Jacksonville, FL 32224-5270

**Contact Mailing Address:** 13410 Sutton Park Dr S, Jacksonville, FL 32224-5270

**County Name:** Duval

**Contact Phone:** (800) 872-9400

**NOTIFIED AS:**

Non-Handler

Transporter

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Non-Handler facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Wes Pace, Hazardous Materials Compliance Director

**LATITUDE / LONGITUDE:** Lat 30° 15' 11.9924" / Long 81° 27' 44.127"

**NAIC** 484121 - General Freight Trucking, Long-Distance, Truckload

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Landstar Ligon, Inc. (Ligon) was inspected on April 30, 2019. At the time of the inspection, the facility was operating as a Hazardous Waste Transporter and Non-Handler of hazardous waste. The facility was last inspected on May 5, 2015. Mr. Wes Pace, (Landstar Transportation Logistics, Inc. (LTL)) was present during the inspection.

**Process Description:**

LTL provides transportation services to its customers for the transportation of general commodities throughout the United States. The primary business is the shipping of goods and materials. LTL also consists of three different transportation companies at this location that are registered as Hazardous Waste Transporters in the State of Florida. Each has a separate EPA ID number: Ligon (FLR 000 099 937), Landstar Express America, Inc. (FLR 000 099 945), and Landstar Ranger (FLR 000 067 157).

According to Mr. Pace, the only hazardous waste shipments are from Department of Energy (DoE) and Department of Defense (DoD) facilities directly to permitted TSDs. No commercial hazardous waste is transported. Landstar Ranger, Inc. is the main LTL company that performs hazardous waste transportation and no waste is brought back to this location. This location is used only as the facility's corporate offices.

Mr. Pace, indicated that Ligon has not been in operation since 2012 but LTL keeps the Hazardous Waste Transporter Registration current due to existing multi-year, long-term contracts that have the potential to use Ligon as a transporter.

**Records Review**

Records reviewed included Ligon's financial assurance forms and hazardous waste transporter registration form. There were no hazardous waste manifests to review since Ligon has not transported any hazardous waste in the previous three years. Mr. Pace indicated that each driver is instructed to download the current

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Hazardous Waste Transporter Registration from the LTL website and keep a copy in the vehicle prior to transporting any hazardous waste. All records reviewed appeared to be in order.

\*\*\*\*\*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 transporter of hazardous waste, your facility may have customers that are 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](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 and other workshop files that discuss the new requirements may also be found here:<ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/TRA%20WORKSHOP%2002-13-2019/>

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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.

Cheryl L Mitchell

**Principal Inspector Name**

Inspector

**Principal Inspector Title****Principal Inspector Signature**

DEP

**Organization**

05/30/2019

**Date**

Wes Pace

**Representative Name**

Hazardous Materials Compliance Director

**Representative Title**

Landstar

**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:**

05/30/2019