From:	Campbell, Dwight
To:	Heyns, Jared
Cc:	Blandin, Norva
Subject:	RE: Crowley Liner Services (EPAID FL0000360560) Exit Interview
Date:	Monday, June 24, 2019 4:40:51 PM
Attachments:	PEV SPCC pgs 1-32.pdf PEV SPCC pgs 33-52.pdf PEV SPCC pgs 53-78.pdf PEV HAZMAT Training.pdf Log of Transfer Waste.pdf Storage Tanks Facility License.pdf

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Hi Jared!

Thank you for the extended time to submit the information for your request!

Please note responses below to the requested information. There were some items that research seemed to indicate that all of the items are not applicable to our location:

1. *Documentation of daily container inspections (hazardous waste containing cargo containers only) (40 CFR 265 Subpart B)* – Under the standard, this appears to be pertaining to "Transfer Facilities". As described during your visit, we do not open the containers while in transit unless there is a notable issue with the shipping container or unless required by a regulating entity.
2. *SPCC/Contingency plan and notification letters to the authorities (including the facility's emergency coordinator and his/her job duties)* -Emergency Coordinator: Dwight Campbell – Health Safety Security and Environmental Manager
3. *Employee training in used oil and hazardous waste management from past 3 years including those employees that manage hazardous wastes (for example, planners, on site drivers, etc) and also, include hazardous materials under 49 CFR 1910* - Employee training records attached.
4. *Closure plan (62-730.171(5) FAC)* - Research of the closure plan appears to be relevant to "Transfer Facilities". 62730-170 details the requirements of transporters to which we have a Certificate of Approval.
5. *Log of transfer waste (hazardous waste and pharmaceutical waste) coming in and out of the facility from previous 3 years. This should include generator name and ID #'s, manifest numbers, dates entering and leaving facility, and amount of HW and HW codes (Section 62-730.171 (6))* – If the interpretation that we are not a "Transfer Facility" holds, then this would not be applicable. A log of our Manifested Waste is attached.
6. *SOP documentation describing the facility's response plan pertaining to leaks and/or spills (40 CFR 263.30 and 263.31)* – Please refer to pages 16 through 24 of the SPCC.
7. *Record of date of registration for the two underground storage tanks on-site (gasoline and diesel station)* – Facility License attached.
8. *62-730.171(4)(a) FAC – preparedness and prevention plan – the inspectors noted that the area of the USDA inspection dock did not have an eye wash liquid in the station* – Corrected.

Again, thank you for the time to further examine the listed items. Researching the items and with discussion with our personnel led to the responses which I fully understand the FL DEP may have different interpretations. I look forward to your review and response!

Thank you,

Dwight Campbell

From: Heyns, Jared <Jared.Heyns@FloridaDEP.gov>
Sent: Monday, June 17, 2019 12:54 PM
To: Campbell, Dwight <Dwight.Campbell@crowley.com>
Cc: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>
Subject: RE: Crowley Liner Services (EPAID FL0000360560) Exit Interview

Dwight,

I will look forward to hearing back from you regarding your response to the exit interview by the close of business on Monday, June 24th. Please let myself or Norva know if there are any questions or concerns.

Thank you,

Jared Heyns
Environmental Specialist II
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Jared.Heyns@floridadep.gov
Office: 561.681.6616

The Department of Environmental Protection values your feedback as a customer. Please take a few minutes to comment on the quality of service you received by completing the DEP Customer Survey.

From: Campbell, Dwight <Dwight.Campbell@crowley.com>
Sent: Monday, June 17, 2019 12:50 PM
To: Heyns, Jared <Jared.Heyns@FloridaDEP.gov>
Cc: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>
Subject: RE: Crowley Liner Services (EPAID FL0000360560) Exit Interview

Hello Jared!

To follow on a conversation, I am requesting a one week extension to make response to the May 28th inspection. There are some specific responses to your requests that need I need to further research and discuss with personnel at our site.

The extension would be greatly appreciated.

Respectfully,
Dwight Campbell, Crowley HSSE Manager Port Everglades

From: Heyns, Jared <Jared.Heyns@FloridaDEP.gov>
Sent: Monday, June 03, 2019 2:47 PM
To: Campbell, Dwight <Dwight.Campbell@crowley.com>
Cc: Spence, Shevon <Shevon.Spence@crowley.com>; Beaudry, Joseph <Joseph.Beaudry@crowley.com>; Blandin, Norva <Norva.Blandin@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Crowley Liner Services (EPAID FL0000360560) Exit Interview

Dwight,

This email serves as an exit interview to the routine hazardous waste inspection conducted by the Department on Tuesday, May 28th, 2019. Thank you again for your time and assistance throughout the inspection. The following non-compliance items were observed during the inspection:

- 62-710.850(5)(a) FAC – used oil filter labeling – the inspectors observed one (1) 55-gallon drum containing used oil filters that was not labeled and was left unsealed; the inspectors provided a label and it was corrected (labeled and sealed) at the time of inspection
- 62-710.401(6) FAC – used oil storage – the inspectors observed two (2) 55-gallon drums containing used oil that were stored outside of the maintenance shop; this was corrected the day of inspection (after the inspectors left; picture of corrective action sent via e-mail 5/28/19) and the drums were placed into the covered storage area and on secondary containment which has the capacity to hold 110% of the volume of the largest tank or container
- 40 CFR 273.13 - Pallet of batteries stored outside – the inspectors observed a pallet of used universal waste batteries stored on a pallet outside exposed to the weather conditions; this was corrected the day of inspection (the pallet was moved inside the maintenance shop where it is covered and not exposed to the weather conditions)
- 40 CFR 262.11 - Two (2) 55-gallon drums of an unknown liquid were stored un-labeled outside; Facility staff suggested the contents were brake cleaner, but the facility shall provide a copy of the disposal record confirming if the waste was hazardous waste or not
- 40 CFR 263.12 – storage of ignitable or reactive waste – hazardous waste-containing cargo containers were stored mixed with non-hazardous cargo containers. During the inspection, the inspectors confirmed that Crowley did not segregate the Hazardous Waste Cargo containers or Biomedical wastes (which is under FDOH regulations) in a " separate" area in order to track these specific shipments and confirm that they were not on-site for a time period exceeding 10 days. Otherwise, the facility is acting as a Storage of Hazardous Waste and therefore would need a permit under 40 CFR 263. If a transporter stores waste in containers at a transfer facility for more than 10 days, the transfer facility becomes a storage facility subject to all applicable requirements for treatment, storage and disposal facilities (TSDFs).
- 62-730.171(2)(b) FAC – lapse in notification status – the facility's previous notification expired

on 11/30/2018 and was not re-registered until 5/9/2019.

- 62-730.171(4)(a) FAC – preparedness and prevention plan – the inspectors noted that the area of the USDA inspection dock did not have an eye wash liquid in the station

Transporters accepting hazardous waste from a generator or another transporter may need to hold waste temporarily during the normal course of transportation. A transfer facility is defined as any transportation-related facility, such as loading docks, parking areas, storage areas, and other similar areas where shipments are temporarily held. A hazardous waste transporter may hold waste without a storage permit in containers at a transfer facility for 10 days or less as long as the waste is manifested and kept in U.S. DOT specification containers. Storage in stationary containers is prohibited unless the transfer facility has a RCRA permit or interim status.

State rule for Hazardous Waste Transfer facilities: https://www.flrules.org/gateway/RuleNo.asp?id=62-730.171
Federal rule for Hazardous Waste Transporter facilities: https://www.ecfr.gov/cgi-bin/text-idx?SID=f8dbf7319774464838cb34cd865f2508&mc=true&node=pt40.26.263&rgn=div5

Also, please provide the following documentation for the Department to review:

- Documentation of daily container inspections (hazardous waste containing cargo containers only) (40 CFR 265 Subpart B)
- SPCC/Contingency plan and notification letters to the authorities (including the facility's emergency coordinator and his/her job duties)
- Employee training in used oil and hazardous waste management from past 3 years including those employees that manage hazardous wastes (for example, planners, on site drivers, etc) and also, include hazardous materials under 49 CFR 1910
- Closure plan (62-730.171(5) FAC)
- Log of transfer waste (hazardous waste and pharmaceutical waste) coming in and out of the facility from previous 3 years. This should include generator name and ID #'s, manifest numbers, dates entering and leaving facility, and amount of HW and HW codes (Section 62-730.171 (6))
- SOP documentation describing the facility's response plan pertaining to leaks and/or spills (*40 CFR 263.30 and 263.31)*
- Record of date of registration for the two underground storage tanks on-site (gasoline and diesel station)

Please provide a response and evidence of your corrective actions by Monday, June 17th. Please do not hesitate to reach out to myself or Norva if you have any questions.

Thank you,

Jared Heyns
Environmental Specialist II
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406

Jared.Heyns@floridadep.gov
Office: 561.681.6616

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