



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

October 4, 2019

Ms. Susan Gill
Dana Transport, Inc.
2700 Buckman Street
Jacksonville, Florida 32206
sgill@danacompanies.com

Re: Return to Compliance Letter
Dana Transport, Inc
EPA/DEP ID: FLR 000 035 873
Duval County – Hazardous Waste

Dear Ms. Gill:

A compliance inspection was conducted at your facility on July 24, 2019, under the authority of Section 403.091, Florida Statutes. Based on the information provided during and following 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 and any non-compliance items which may have been identified at the time of the inspection have been corrected.

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 Cheryl L. Mitchell of the Northeast District Office at 904-256-1620 or via e-mail at cheryl.l.mitchell@FloridaDEP.gov.

Sincerely,

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

Heather Webber
Environmental Administrator

Enclosure: Inspection Report

Ec: Diane Price (dprice@danacompanies.com), Gene Patten (gpatten@danacompanies.com), Yesenia Rodriguez (yrodriguez@danacompanies.com), Howard Garrison (hgarrison@danacompanies.com), Deborah Wright (dwright@danacompanies.com),
FDEP Jacksonville: Cheryl Mitchell, Pam Cosgrove, Heather Webber, DEP_NED



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

FACILITY INFORMATION:

Facility Name: Dana Transport Inc
On-Site Inspection Start Date: 07/24/2019 **On-Site Inspection End Date:** 07/24/2019
ME ID#: 56688 **EPA ID#:** FLR000035873
Facility Street Address: 2700 Buckman St , Jacksonville , Florida 32206-3368
Contact Mailing Address: 2700 Buckman St, Jacksonville, Florida 32206-3368
County Name: Duval **Contact Phone:** (904) 634-1999

NOTIFIED AS:

Non-Handler
Transporter

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter
Routine Inspection for Non-Handler Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector
Other Participants: Susan Gill, Terminal Manager

LATITUDE / LONGITUDE: Lat 30° 21' 18.8246" / Long 81° 37' 59.36"

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

TYPE OF OWNERSHIP: Private

Introduction:

Dana Transport, Inc. (Dana, the facility) was inspected on July 24, 2019. A site visit was also conducted on August 8, 2019, for records review. The facility was last inspected by the Department's Hazardous Waste Program on September 1, 2015. Dana notified the Department as a Hazardous Waste Transporter and Non-Handler of hazardous waste (NHR) in 1997. Ms. Susan Gill, Terminal Manager, was present throughout the inspection and the record review.

Dana has been in operation at this location since 1997 and owns the property. The facility is connected to city water and sewer. Dana has five employees at this location, including four drivers, and operates Monday through Friday from 8:00 AM to 5:00 PM. The facility consists of an administrative office and Parking Lot.

Process Description:

Dana has been assigned EPA ID# FLR 000 035 873 and is registered in Florida as a Hazardous Waste Transporter. However, Dana transports hazardous waste under EPA ID# ALD 095 704 011 that is assigned to a subsidiary of Dana that is a registered Hazardous Waste Transporter in Florida. The hazardous waste containers originate in Puerto Rico and are transported via vessel by Crowley Liner Service (Crowley, PRD 090 559 360) to Crowley's facility located at 3001 Talleyrand Avenue (FLR 000 054 221). Dana's drivers then pick-up the containers and ISO tanks of hazardous waste at Crowley and transport the containers to the facility at 2700 Buckman Street (Photo 1) until delivery can be arranged with the designated Treatment, Storage, and Disposal Facilities (TSDF). Hazardous wastes are primarily transported to PSC Allworth (ALD 094 476 793) in Birmingham, Alabama and Geocycle LLC (SCD 003 368 891) in Holly Hill, South Carolina. Hazardous waste pharmaceuticals are primarily transported to BASF Corp. (SCD 981 866 007) in Seneca, South Carolina.

Dana Transport Inc Inspection Report

Inspection Date: 07/24/2019

Parking Lot

At the time of the inspection, there were several containers of chemical products, empty containers for emergency use and empty containers pending structural integrity testing (Photo 2). There were two containers of hazardous waste observed in this area. According to the facility's paperwork, one container had been on-site for seven days, and the other container had been on-site for one day. Both containers were scheduled to be shipped off-site the day of the inspection. Because one container of hazardous waste had been stored at the facility for more than 24 hours but less than 10 days, and the facility is not a hazardous waste transfer facility, this would be considered a change in the type of regulated waste activity. Dana had not notified the Department of this change [62-730.150(2)(b), FAC]. However, Dana confirmed that it did not want to make a change to its regulated waste activities and would immediately implement procedures to not store hazardous waste at the facility for more than 24 hours.

Dana is reminded that the facility's current location at 2700 Buckman Street would not meet the siting requirements for a Hazardous Waste Transfer Facility as required by Section 403.7211(2), Florida Statutes. Therefore, Dana should ensure that hazardous waste is not stored at the facility for more than 24-hours.

Records Review

The Hazardous Waste Transporter registration certificates were posted at the facility and insurance certificates were current. Manifests for the previous three years were available for review. 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 Hazardous Waste Transporter, customers supported by your facility 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

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 - HazWaste/TRA WORKSHOP 02-13-2019/>

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-730.150(2)(b)
Explanation:	The facility failed to notify the Department of a change in the type of regulated waste activity.
Corrective Action:	No further action is required. The facility returned to compliance the day of the inspection by implementing procedures to ensure that hazardous waste would not be stored at the facility for more than 24 hours.

Report Inspection Date: 07/24/2019

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 07/24/2019

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			✓

Inspection Date: 07/24/2019

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

Inspector

Principal Investigator Name**Principal Investigator Title**

DEP

09/30/2019

Principal Investigator Signature**Organization****Date**

Susan Gill

Terminal Manager

Representative Name**Representative Title**

Dana Transport Inc

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:

09/30/2019