



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

August 21, 2020

Mr. John Bosek, General Manager
Clean Harbors Florida, LLC
7001 Kilo Ave, Bartow, FL 33830
bosek.john@cleanharbors.com

Re: Clean Harbors Florida, LLC
FLD980729610
Polk County

Dear Mr. Bosek,

Department personnel conducted a hazardous waste compliance inspection of the above-referenced facility on August 5, 2020. 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 compliance efforts. Should you have any questions or comments, please contact Leslie Pedigo at (813) 470-5870 or via e-mail at: Leslie.Pedigo@FloridaDEP.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "SKK", is placed above the printed name.

Shannon Kennedy
Compliance Assurance Program
Southwest District

SK/lelp

Enclosures: Inspection Report

cc: Shannon Kennedy, FDEP/SWD; Shannon.Kennedy@FloridaDEP.gov
Leslie Pedigo, FDEP/SWD; Leslie.Pedigo@FloridaDEP.gov
Abigail Bridges, FDEP/SWD; Abigail.Bridges@FloridaDEP.gov



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

FACILITY INFORMATION:

Facility Name: Clean Harbors Florida LLC
On-Site Inspection Start Date: 08/05/2020 **On-Site Inspection End Date:** 08/05/2020
ME ID#: 50782 **EPA ID#:** FLD980729610
Facility Street Address: 7001 Kilo Ave, Bartow, Florida 33830-6672
Contact Mailing Address: 7001 Kilo Ave, Bartow, Florida 33830-6672
County Name: Polk **Contact Phone:** (863) 519-6331

NOTIFIED AS:

LQG (>1000 kg/month), Pharmaceuticals Reverse Distributor, TSD Facility, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Importer **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** On-Spec, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)
Hazardous Waste Pharmaceuticals:
Pharmaceutical Activities: Reverse Distributor

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Other Participants: Abigail Bridges, Environmental Septcial II; John Bosek, Facility General Manager

LATITUDE / LONGITUDE: Lat 27° 57' 20.2397" / Long 81° 46' 45.0001"

NAIC: 562211 - Hazardous Waste Treatment and Disposal

TYPE OF OWNERSHIP: Private

Introduction:

Clean Harbors Florida, LLC -Bartow (Clean Harbors - Bartow) was inspected on August 5, 2020, by the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility initially notified as a generator of hazardous waste on June 28, 1982 under the name International Solvent Recovery. The facility has been inspected numerous times by the Department, most recently on May 4, 2018. The facility is currently notified as a Large Quantity Generator, a Universal Pharmaceuticals, Importer and Large Quantity Handler. John Bosek, General Manager, accompanied the inspectors during the inspection and Scarlett Russell provided records.

Clean Harbors - Bartow is a permitted hazardous waste storage facility. The facility's operating permit, Hazardous Waste Operation Permit No. 64247-HO-017/Solid Waste Permit No. 64247-SO-019 was effective November 29, 2018 and expires December 10, 2021. The permit authorizes container and tank storage of hazardous waste, as well as fuel blending activities. In addition to the permit, Clean Harbors has the following certifications/registrations/permit:

- Hazardous Waste Transporter; the current certification expires on June 30, 2021.
- Used Oil/Used Oil Filter Transporter, Used Oil/Used Oil Filter Transfer Facility, and Used Oil Marketer; the current registration expires on June 30, 2021.
- Transporter of Universal Waste Lamps and Devices, Transfer facility for Universal Waste Lamps and Universal

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Waste Devices and a Large Quantity Handler Facility for Universal Waste Lamps and Devices; the current registration expires on March 1, 2021.

- Pharmaceutical Reverse Distribution; the current registration expires on March 1, 2021.
- Air Program Operating Permit #1050167-015-AO was effective on August 15, 2019 and expires on August 18, 2024.
- TSCA Permit for PCB #FLD980729610 was effective 6/13/2013 and expires on June 13, 2023.
- DEA Pharmaceutical Reverse Distribution, effective August 6, 2019.
- Department of Health Biomedical Waste Storage permit was effective on October 1, 2019 and expires on September 30, 2020.

Process Description:

The facility is located on a 10-acre parcel owned by the City of Bartow Municipal Airport. The facility contains five buildings (the Operations Office and Laboratory Building, the Maintenance Building, the North Container Storage Building, the Boiler Building, and the South Container Storage Building) and other structures. The facility is open from 7:00 am to 5:00 pm, Monday through Friday. Currently there are 68 employees; eight are assigned to Plant Operations while the remainder work in Remedial Services, Field Services (customer pick-ups), National Transportation (truck drives) or in the office.

In order to track incoming and outgoing wastes, the facility uses a labeling and container bar coding system which is linked to the incoming and outgoing manifests and which references the approved waste profiles for each of the facility's customers. If problems are detected during checks conducted under the facility's waste analysis plan, Clean Harbors contacts the generator to resolve the situation. On occasion, the facility receives unmanifested waste transported on bills of lading; Clean Harbors provides unmanifested waste reports to the Department for these shipments. Compared to prior inspections, relatively little waste is being stored on site; the waste is being stored in the North Container Storage Building or in the Hazardous Waste Tanks. Most waste is shipped directly to the designated facility or sorted at the facility to consolidate shipments to the designated facilities.

Seven propane powered forklifts are used at this location; and outside contractor, Southeastern Lift, conducts the maintenance on this equipment. Emergency equipment was in place throughout the facility and regularly inspected and well maintained.

Maintenance Building

The Maintenance Building, which houses both the Field Services and Facility Maintenance, is located on the north side of the facility. No wastes are stored in the Field Services section of the building, just products. A closed container for shop rags and a container for 4-foot spent fluorescent bulbs were located in Facility Maintenance. The container was closed and properly labeled. The start date of October 15, 2019; please note that universal waste lamps cannot be stored on site for more than 365 days.

Low Explosive Magazine

Consumer fireworks collected from retail locations may be stored in a low explosives magazine that now occupies a previously authorized roll off storage location, south of the North Container Storage Building. This unit was empty at the time of the inspection and appears to be well maintained.

North Container Storage Building (SWMU 13)

The North Container Storage Building was within permitted capacity. Containers were managed in rows of pallets in accordance with the permit. Containers were closed, contained hazardous waste labels and generally in good condition. Most of the containers had separate labels with an indication of the as to the hazard of the contents in accordance with the requirements in 40 CFR 262.17 (a)(5)(B). However, for a number of containers, the additional label was a DOT Class 9 Labels. According to guidance provided by the EPA in recent meetings, DOT Class 9 Labels are not acceptable to meet this requirement as this label only indicates that the container contains "miscellaneous dangerous goods," and not an indication of the hazard of the waste. Upon closer inspection of the hazardous waste labels, an indication of the hazard was noted. However, the size of the writing on these labels makes identification of the hazard impossible without a close inspection of the label.

Containers of transfer waste were stored in designated areas, and none were found to have been held more

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than 10 days during the course of transfer. In order to prepare for off-site container shipments, a pick list is selected depending on the designated facility, and the container bar codes are checked against the pick list when the container is staged for loading. Transfer waste and outgoing loads are staged in accordance with USDOT compatibility criteria prior to loading into semi-trailers.

Solid Waste Shredder and Mix Tub Solidification Area (SWMU 16)

The facility permit authorizes operation of a solid waste shredder and solidification tub; this equipment is located on the west side of the facility. The Department conducted a Solid Waste Program inspection of this unit on July 10, 2020. A copy of the inspection can be found under the Solid Waste ID #WACS 101281.

Boiler Building

The Boiler has been removed for the Boiler Building and the building is used for material storage; not wastes are stored in this building.

Used Oil Management/Fuel Blending

Two 5,800-gallon used oil aboveground storage tanks are located on the western side of the facility, south of the Boiler Building. This process is no longer being conducted at the facility and the tanks are empty with the exception of residual sludge in the bottom of the tanks. These tanks are registered with the Storage Tank Program under Facility ID # 9602192 and are designated as Tank 700 and Tank 701. The tanks were most recently inspected by the Department of Health in Polk County Storage Tanks Program on July 29, 2020.

South Storage Building (SWMU 2)

The South Storage Building was not actively being used for waste storage at the time of the inspection. A few containers of materials for beneficial reuse were in storage in this building. No wastes other than the satellite accumulation drum located next to the Fuel Blending Tanks.

Fuel Blending Tanks (SWMU 1)

The fuel blending tanks, T-112 and T-114, are located inside the South Container Storage Building. This process is no longer being conducted at the facility. Two satellite accumulation drums are currently located next to the Fuel Blending Tanks is still present. Per Mr. Bosek, these drums will be removed in the near future.

Hazardous Waste Tanks (SWMU 5)

The tank farm, located north of the South Container Storage Building, contains ten hazardous waste aboveground storage tanks, designated as T-101 through T-110. Each of these tanks are 6,000-gallons in size. The hazardous waste storage tanks have a cone bottom and are not agitated. The entire content is transferred to a bulk tanker for transport either to a disposal facility or to the CSX Transflo intermodal transfer facility where rail cars are loaded. The tank shell thickness was most recently tested in March of 2020 by ultrasound, and inspection records were available.

The facility's tank system was in compliance with Subpart J requirements. Valves and flanges were tagged as required by 40 CFR 264 Subparts AA and BB. Inspections and emissions monitoring are being conducted in accordance with the permit, and records are maintained.

One of these tanks is out of service due to corrosion detected in a shell thickness check (T-101). The remaining tanks contained between 1,358 and 3,799 gallons of hazardous waste (mostly sludges in the cones at the base of the tanks).

Hazardous Waste Roll-Off Storage Areas (SWMU 15)

Hazardous waste roll-offs have not been stored at the facility for the past two years.

Operations Office and Laboratory Building

If samples are collected as part of the waste analysis plan checks, the samples are bar coded with the same

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code as the container and are transferred to the facility's lab which is located in the Operations Office and Laboratory Building. After the analyses are complete, and it is determined that there is no need to retain a sample, they are discarded into one of three containers in the satellite accumulation area: a 30-gallon metal drum for waste flammable liquids; a 55-gallon polypropylene drum for waste solid debris; and a 30-gallon-polypropylene drum for waste mixed PCB, flammable, corrosives or toxic liquids. Please note that, in accordance with 40 CFR 262.15(a), which was approved under the generator improvements rule, no more than 55-gallons of non-acute hazardous waste can be stored in a satellite accumulation area. As the total hazardous waste present in these drums was estimated to be less than 55-gallons in total at the time of the inspection, this provision was not in violations. However, the facility needs to evaluate this satellite accumulation area to ensure that they are able to comply with this provision. The containers were closed, contained hazardous waste labels and in good condition. While most of two of the containers were labeled with an indication of the as to the hazard of the contents per 40 CFR 262.17 (a)(5)(B), the waste solid debris was labeled with DOT Class 9 Label which does not meet the requirements of 40 CFR 262.17 (a)(5)(B). Upon closer inspection of the hazardous waste label, an indication of the hazard was noted. However, the size of the writing on these labels makes identification of the hazard impossible without a close inspection of the label.

Records

The facility contingency plan was last reviewed and updated on January 20, 2020. The plan was available at the facility and has been submitted to the Department and uploaded into OCULUS. The most recent update was minor: adding a reference to the Low Explosive Magazine, updating and consolidating two contact lists. Please note that when the contingency plan is next updated, a "Quick Reference Guide" will need to be included in the plan. The Quick Reference Guide must include eight elements that are critical to local responders when an emergency is occurring at a facility. These include:

- The types and names of the hazardous wastes on site and their hazard in layman's terms (e.g., toxic paint wastes, spent ignitable solvents);
- An estimated maximum amount of each hazardous waste on site at any one time;
- The identification of any hazardous waste that would require unique or special treatment by medical staff in the event of exposure;
- A map of the facility identifying where hazardous waste may be located;
- A street map of the facility in relation to surrounding businesses, residences, and schools;
- The location of the water supply;
- Information about any on-site notification systems to communicate with people at the facility; and
- The name of an emergency coordinator available at any time.

The facility personnel training records, inspection records and manifests were reviewed and found to be in order.

PHOTO ATTACHMENTS:

Field Services end of the Maintenance Building



Maintenance Shop in the Maintenance Building



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Spent Lamp container in the Maintenance Shop



10-day Staging Area in the North Container Storage Building



Hazardous Waste containers in storage - North Container Building



Low Explosive Magazine



Container with DOT Class 9 label - North Container Building



Hazardous Waste containers in storage - North Container Building



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Solid Waste Shredder and Mix Tub Solidification Area



Used Oil Tank Farm



South Container Building



South Container Building



Fuel Blending Tanks



Satellite containers in the Fuel Blending Tanks area



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Hazardous Waste Tank Farm

Waste solid debris - Laboratory

**Waste flammable liquids - Laboratory**

Waste mixed PCB - Laboratory

**Conclusion:**

Based on the results of this inspection, Clean Harbors was in compliance with hazardous waste requirements. Solid waste processing operations were not reviewed during this inspection.

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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.

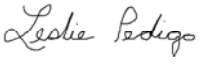
Note: Checklist items with shaded boxes are for informational purposes only.

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

Leslie Pedigo	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	08/20/2020
Principal Investigator Signature	Organization	Date
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Abigail Bridges	Environmental Sepctial II	
Inspector Name	Inspector Title	
	FDEP/SWD	
	Organization	
<hr/>		
John Bosek	Facility General Manager	
Representative Name	Representative Title	
	Clean Harbors	
	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:	<u>Shannon Kennedy</u>	Inspection Approval Date:	<u>08/20/2020</u>
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