



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

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC
On-Site Inspection Start Date: 03/19/2021 **On-Site Inspection End Date:** 03/19/2021
ME ID#: 28737 **EPA ID#:** FLD065680613
Facility Street Address: 105 S Alexander St, Plant City, Florida 33563-4833
Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, Illinois 60123
County Name: Hillsborough **Contact Phone:** (847) 836-5670

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec, Off-Spec, Oil Filters, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Marketer Facility
Routine Inspection for Used Oil Generator Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Jordon Luscier, Environmental Specialist I; Tony Piotrowski, Facility Manager; David
Other Participants: Pomella, Laboratory Manager; Kelly Hernandez, Plant Administrative Coordinator

LATITUDE / LONGITUDE: Lat 28° 0' 42.0089" / Long 82° 8' 24.5084"

NAIC: 423930 - Recyclable Material Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Heritage Crystal-Clean, LLC (HCC) was inspected on March 19, 2021, to evaluate the facility's compliance with the facility's permit and with state and federal regulations governing used oil and hazardous waste. Little has changed at the facility since the previous inspections of May 20, 2016 and January 30, 2018, except as noted. Tony Piotrowski, Facility Manager, David Pomella, Laboratory Manager, and Kelly Hernandez, Plant Administrative Coordinator, assisted the inspectors throughout the inspection.

HCC is a used oil transporter, processor and marketer of on-spec used oil operating under permit #30676-010-HO, which expires on August 20, 2023.

The facility has maintained their annual Used Oil Transporter, Used Oil Transfer Facility, Used Oil Processor, Used Oil Marketer, Used Oil Filter Transporter, and Used Oil Filter Transfer Facility registration; the upcoming registration year, July 1, 2021 to June 30, 2022, was submitted on February 12, 2021 and granted by the Department on February 24, 2021.

The facility has maintained their annual Hazardous Waste Transporter registration; the upcoming registration year, July 1, 2021 to June 30, 2022, was submitted on February 12, 2021 and granted by the Department on February 25, 2021.

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

Process Description:

The facility is a used oil re-refining facility that produces a fuel oil as well as an industrial oil. The fuel oil, which is equivalent to No. Five Fuel Oil, is sent to a sister facility in Indianapolis for further processing; the industrial oil is primarily used in the phosphate industry. The facility collects used oils, oily wastes, petroleum contact water (PCW), off-specification fuels, used oil filters, and waste antifreeze from numerous commercial generators and transports them to the facility for processing. While the facility has been located at this location since 1981, the 7.53-acre property was purchased by Heritage Crystal Clean, LLC (formerly FCC Environmental, LLC) on January 13, 2011. The property contains an oil re-refinery facility, industrial wastewater pretreatment facility, storage tanks, and the following buildings:

- Building 1, which is 6,180 ft², was built in 1984 and houses the Operations Office, Shop and Used Oil filter management
- Building 2, which is 1,768 ft², was built in 1987 and houses the Control Room and Laboratory
- Building 3: 960 ft² was built in 1999 and houses the Sales Office
- Building 4: 1440 ft² was built in 1999 is empty and slated for disposal
- Building 5: 390 ft² was built in 1984 and houses the Maintenance Shop

The facility currently has 28 employees, including truck drivers. The office is open from 8 am to 5 pm, Monday through Friday and the plant is open from 4 am to 1 am, Monday through Friday (longer as needed). At the current time, the facility operates the following vehicle: five oil trucks with capacities between 3,000 and 5,000-gallons; two box trucks for used oil filter pickups; four vacuum trucks that service oil/water separators; two roll-off trucks that are company owned; four roll-off trucks that are rentals; two vacuum boxes; and four tractor trailers. All maintenance on these vehicles is conducted off site by contractors. There is one excavator, three forklifts, one electric pallet jack and two manual pallet jacks that are used in the yard. Taylor Forklifts maintains the forklifts and pallet jacks as needed.

The facility maintains their required spill control equipment and fire safety equipment. Since the last inspection, the facility installed the Enforcer 60 which allows fire foam to be directed at fires from a greater distance.

USED OIL ACCEPTANCE

HCC receives used oils via truck, tanker truck and occasionally rail car. Prior to pick up from their customers, used oil is screened for halogen content using a halogen meter and Drexel. If either test fails, the customer is required to provide a laboratory test for halogen content unless they are a Public Used Oil Collection facility or a Very Small Quantity Generator (VSQG). If the used oil is found to contain >1,000 ppm halogens, the oil will not be collected without direction and approval from HCC's Divisional Oil and Vacuum Service Manager. In addition to the field screening, at least one retain sample is obtained at each pick-up.

Once on-site, the used oil loads are screened by the on-site laboratory. Single source loads that fail the screening are kept segregated until the presumption is either rebutted or not. If it cannot be rebutted, the load is rejected, and usually returned to the generator unless other arrangements are made. Loads of consolidated used oil that fail the halogen screening upon arrival are segregated and analyzed to characterize the waste. Each retain sample is then analyzed to determine which customer had the contaminated used oil. If the presumption can be rebutted based on who generated it (e.g., Public Used Oil Collection facility or VSQG), the oil will be accepted. If not, the load is transported to a TSD, and the original generator signs the hazardous waste manifest. Used oil received from third-party transporters is segregated by placing the material into a dedicated tank and are not released until additional on-site screening is conducted and passed.

USED OIL PROCESSING

Accepted oils are transferred to registered aboveground storage tanks (ASTs) in the South Tanks Farm (Tanks #1 through #12) for storage pending to being processed on-site in the facility's used oil processing system. Vacuum trucks are off-loaded at the bermed concrete pad located on the west end of the South Tank Farm while other trucks are used oil tanker trucks are off-loaded on the concrete bermed pad immediately east of the West Tank Farm.

The used oil is then sent to Tank #630 (West Tank Farm) where it is stored until it can be processed in the plant. As needed, used oil from Tank #630 is metered into the plant. When the oil first enters the processing area, it

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

goes through an atmospheric distillation column, then through a vacuum distillation column. In this process, the oil is heated to between 240° and 270°. Used oil from Tank #630 is also used to feed the furnace. The plant and water plant are both located in the North Containment Area

Processed oil is then forwarded to Tank #30KV (West Tank Farm) and then on to the shaker tank (next to the South Tank Farm) to remove any debris. The oil is then sent to Tank #552 (West Tank Farm), where it is sampled and tested to verify that it meets the used oil on-specification criteria. Processed/reclaimed oil is tested to determine the quality.

Used oil that meets Mosaic's specifications is typically sent to Tanks #C1, #C2 and #C5 (located in the West Tank Farm) for storage prior to being sold and sent to the mines as floatation oil. Processed oil destined for further refining is stored in Tanks #10K and #20KV (located in the west Tank Farm) before being shipped to Indianapolis. Finished product is loaded onto trucks at the loading racks, one on the north side of the South Tank Farm and the other on the south side of the West Tank Farm.

WATER PLANT

The water plant is located on the north side of the Oil Plant containment pad. Tanks #31, 32, 33, SKV, and SKE are used to process the water collected from the oil plant operations, stormwater collected from the facility and petroleum contact water collected from customers.

USED OIL FILTERS

Used oil filters containers are brought to the Used Oil Filter Management Area on the south end of Building 1 and on the paved and bermed area to the west. According to facility personnel, this area was designed to hold approximately 3,000-gallons of liquid. Drums containing used oil filters are placed in the drum dumper, and the contents of the drums are emptied into four cubic-yard dumpster hoppers; the hoppers are located inside the building unless being dumped into the used oil filter roll-offs which are located on the pad outside. There is no longer a used oil filter crusher located on site, as the crusher was drained and scrapped in 2016.

Metal used oil filters are sent to US Foundry in Miami, Florida where they are crushed and smelted. Paper used oil filters are managed as non-hazardous waste and are sent to the McKay Bay Waste-to-Energy facility along with any soiled rags from the facility. Empty used oil filter bins are taken to the bermed concrete pad located on the west end of the South Tank Farm where any accumulated liquids are removed by a vacuum truck and pumped into one of the receiving tanks for eventual processing. This pad has an approximately 2,500-gallon capacity.

DRUM WASH AREA

Older and/or damaged drums that can no longer be used are brought to the drum wash area and are cleaned using a hot water steamer. Plastic drums are cut up and sent to Cedar Trails landfill for disposal, metal drums are sent to Allied Recycling in Lakeland as scrap.

RAIL CARS

The facility has containment for five rail cars. Railcars are only loaded or unloaded from the top and only if over one of the containment areas.

ANTIFREEZE

Totes of antifreeze are brought to the facility via tractor trailers. Used antifreeze is stored in Tank #20V which is located in the South Tank Farm. The used antifreeze is sent to the HCC facility in Rockville Virginia for processing.

PETOLEUM CONTACT WATER (PCW)

PCW from customers (from tank bottoms, containment areas, etc.) is offloaded into Tank #82V and Tank #10V; these tanks also receive any PCW generated at the facility. PCW is sent to the water plant for processing and the oils generated at the water plant is put into the used oil process.

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

GARAGE

The garage area is a covered area and includes an impermeable surface. Various properly labeled used oil and used oil filter drums were located in this area.

ABOVEGROUND STORAGE TANKS

South Tank Farm:

- Tanks #1 through #12 contain incoming used oil.
- Tank #20V contains used antifreeze.

West Tank Farm:

- Tanks #630 is used to store used oil prior to being sent to the plant
- Tank #552 contains finished oil.
- Tank #30KV contains refined oil from the plant, prior to being sent to the shaker.
- Tanks #10V and 82V store PCW.
- Tank #C1, Tank #C2 and Tank #C5 are multipurpose tanks that are typically used to store processed oil destined for Mosaic.
- Tank #10K and Tank #20KV store used to store processed oil destined for further processing at HCC's Roanoke, Virginia facility.

All tanks were observed to be appropriately labeled (e.g., used oil, petroleum contact water, etc.) and well maintained.

- Tank #24, located in a containment area between the rail lines and the drum wash area, has been decommissioned and the facility plans to remove this tank in the near future.

The various aboveground storage tanks are also regulated under the Department's Storage Tanks Program under facility ID #8625319. The Hillsborough County Environmental Protection Commission (EPC) conducted a Storage Tank Program inspection at this facility on March 30, 2021.

TRUCK STAGING AREA/WEST END OF THE PROPERTY

The truck staging area is located on the west and southwest end of the paved yard. At the time of the inspection two roll-offs were located in this area: one containing scrap metal being collected for recycling by Allied Recycling and the other solid debris being collected for disposal at Cedar Trails Landfill. Several empty vehicles were also present in this area: one vacuum truck, two oil tankers, one empty trailer and a trailer containing drummed used oil filters that will be emptied the following Monday.

UNPAVED WEST END OF THE PROPERTY

There were three empty vertical ASTs being on their side stored in the field west of the paved yard. These are intended to be added to the containment next to the drum wash area once Tank #24 has been disposed of in the future. Additionally, these were two empty trailers, two empty box trucks, and one empty oil truck in this area.

PLANT MAINTENANCE SHED

The maintenance shed contained paints and coating containers used for the containment areas. Paints are bought as needed. Two drums of product degreaser, labeled corrosive, were located outside this area; these had just been delivered and will be moved under cover. One empty dumpster hopper was also located in this area.

LABORATORY/CONTROL ROOM

The electronic "long sheet" located in the control room section of the lab tracks incoming truck shipments. Labeled used oil samples are maintained in the cabinets; one inside the laboratory and four located outside against the west wall of the laboratory building. Emergency coordinator contact information was posted in a visible area on the wall in the control room.

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

SOLID WASTE CONSOLIDATION PIT

The facility has a waste consolidation pit which is located on the paved and bermed area on the east side of the West Tank Farm.

RECORDS REVIEW

Records of inspections of the facility, tank systems, containment, yard, etc., were reviewed and appear to be current and in accordance with the permit requirements.

Used oil shipping records for 2020 through 2021 were spot checked, and the facility appears to be recording all required information.

The facility's non-conforming log was reviewed and appeared to be up to date. There were ten non-conforming events in 2019, sixteen in 2020 and 4 so far in 2021.

A copy of the Contingency Plan/Facility Response Plan was located at the facility and was last updated on October 26, 2020.

Documents containing arrangements made with local authorities were present.

A copy of the Used Oil and Solid Waste WAP from August 2020, was located at the facility.

A copy of the SPCC Plan, dated June 21, 2018, was located at the facility.

A valid registration form with the ID number and newest permits were posted in the license board in the operations office at the facility.

Tracking to ensure that 95% of maximum capacity is not exceeded was implemented and up to date. The facility conducts a daily inventory; at the time of the inspection, 1.2 million gallons of used and processed oil was on site.

PHOTO ATTACHMENTS:

South Tank Farm



West Tank Farm



Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

Used oil filter processing area; tank #24 in the background



Tanker loading area next to the West Tank Farm

Processed oil shaker on the pad west of the South Tank Farm



South Tank Farm and adjacent rail line



Waste solidification pit next to the West Tank Farm



Conclusion:

Heritage Crystal-Clean, LLC appears to be operating in compliance with the associated used oil permit (permit #30676-010-HO) as well as applicable rules and regulations.

Inspection Date: 03/19/2021

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: 03/19/2021

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**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**04/12/2021**Date**Jordon Luscier**Inspector Name**Environmental Specialist I**Inspector Title**FDEP/SWD**Organization**Tony Piotrowski**Representative Name**Facility Manager**Representative Title**Heritage Crystal-Clean, LLC**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.

David Pomella**Representative Name**Laboratory Manger**Representative Title**Heritage Crystal-Clean, LLC**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.

Kelly Hernandez**Representative Name**Plant Administrative Coordinator**Representative Title**Heritage Crystal-Clean, LLC**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:

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 03/19/2021

Approver: Michael C Lynch

Inspection Approval Date: 04/13/2021