



# 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

April 21, 2021

Kevin Roberts, Railway Manager  
Tampa Transflo Terminal  
504 N 34th St  
Tampa, Florida 33605  
[kroberts@roadandrail.com](mailto:kroberts@roadandrail.com)

Re: Tampa Transflo Terminal  
Facility ID No. FLR000105338  
Hillsborough County

Dear Mr. Roberts:

Department personnel conducted a compliance inspection of the above-referenced facility on March 30, 2021. 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 Sarah Brownlee at 813-470-5911, or via e-mail at: [Sarah.Brownlee@FloridaDEP.gov](mailto:Sarah.Brownlee@FloridaDEP.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lynch".

Michael Lynch  
Compliance Assurance Program  
Southwest District  
Florida Department of Environmental Protection

ec: Michael Lynch, DEP; [Michael.Lynch@FloridaDEP.gov](mailto:Michael.Lynch@FloridaDEP.gov)  
Sarah Brownlee, DEP; [Sarah.Brownlee@floridadep.gov](mailto:Sarah.Brownlee@floridadep.gov)  
Gerry Javier, EPC; [Javier@epchc.org](mailto:Javier@epchc.org)



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

---

**FACILITY INFORMATION:**

**Facility Name:** Tampa Transflo Terminal  
**On-Site Inspection Start Date:** 03/30/2021      **On-Site Inspection End Date:** 03/30/2021  
**ME ID#:** 37009      **EPA ID#:** FLR000105338  
**Facility Street Address:** 504 N 34th St, Tampa, Florida 33605-6200  
**Contact Mailing Address:** 500 Water St #J975, Jacksonville, Florida 32202-4423  
**County Name:** Hillsborough      **Contact Phone:** (904) 259-2279

**NOTIFIED AS:**

Transfer Facility, Transporter, Used Oil, VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG **Transporter:** Commercial Waste, Transfer Facility

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transfer Facility Facility  
Routine Inspection for Used Oil Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Sarah M Brownlee, Inspector  
**Other Participants:** Leslie Pedigo, Environmental Consultant; Kevin Roberts, Railway Manager

**LATITUDE / LONGITUDE:** Lat 27° 57' 5.8056" / Long 82° 25' 21.1206"

**NAIC:** 488210 - Support Activities for Rail Transportation

**TYPE OF OWNERSHIP:** Private

**Introduction:**

An inspection was conducted at Tampa Transflo Terminal ("Tampa Transflo") on March 30, 2021 by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil transporters. Tampa Transflo has been inspected several times by the Department most recently being February 15, 2018. The facility last notified on October 8, 2020 as a very small quantity generator of hazardous waste; this status was verified during the inspection. The facility is also currently notified as HW Transporter, HW Transfer Facility (expires on 06/30/2021), Used Oil Transporter, and a Used Oil Transfer Facility (expires on 06/30/2021). Inspectors were assisted by Kevin Roberts, terminal manager, during the inspection.

**Process Description:**

The Tampa Transflo Terminal is a rail to truck and truck to rail transfer facility for bulk commodities, including used oil and non-hazardous goods. Materials are loaded into rail cars by the truck drivers and stored on site until full cars are transferred to CSX for transport to either the next non-rail transporter or the destination facility. The facility previously used to store and transfer hazardous waste, but discontinued the practice in early 2020. Other than no longer handling hazardous waste, operations at the facility have not changed since previous inspections. While Arrow Material Services was previously contracted to operate this facility, since July 2019, the operations have been contracted to Road and Rail Services. Kevin Roberts remains the terminal manager. Tampa Transflo currently has 13 full time employees. The facility is on City of Tampa water and sewer.

The records review for the facility was performed prior to the facility walk through. Hazardous waste manifest records up until their final shipment on June 8, 2020 were reviewed and appeared to be complete. Used oil shipment records were reviewed and appeared to be complete. In lieu of a traditional weekly hazardous waste inspection log, Tampa Transflo maintained a 10 day storage log for hazardous waste while it was still on site and continues to maintain a 35 day storage log for used oil, which recorded all needed information. The 35-day

## Tampa Transflo Terminal Inspection Report

Inspection Date: 03/30/2021

storage clock starts with the initial transfer of used oil into a rail car. Records showed that no waste was stored on site for more than the allowable limit. The facility maintains a contingency plan and has annual training records that were available for review.

Used oil is transferred and stored on one half of track #5 (the other half is for cement transfers). According to Mr. Roberts, arriving rail cars are inspected within 24 hours of arriving and again prior to leaving. At the time of the inspection, there were (3) railcars present that were labeled used oil. Track pans are in place, and any spills which are not contained by the pan will drain to a trench which drains through a junction box to the facility's central storm water collection sump. Knife valves are able to isolate the trenches and a secondary valve is present if needed to prevent the discharge of the facility's storm water system in the event of a spill. Emergency equipment, including spill kits, decontamination showers and fire extinguishers are in place next to the tracks. Staff are all equipped with communication devices while working on site.

At the time of the inspection, a storage shed on the property contained: (3) 55-gallon drums of used absorbents, (2) 55-gallon drums of used oil filters, (1) 55-gallon drum of aerosol cans, (1) 55-gallon drum of used oil, and (1) 55-gallon drum of product (cement additive). A second 55-gallon used oil drum was empty at the time of the inspection. The aerosol cans are being managed as universal waste under the new rule 40 CFR 273.6. All containers were properly closed and labeled as required.

### PHOTO ATTACHMENTS:

Track Pans



Spill Response Kit Near Tracks



Storage Shed



Storage Shed



### Conclusion:

At the time of the inspection, Tampa Transflo Terminal was operating in compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil transporters.

## Tampa Transflo Terminal Inspection Report

Inspection Date: 03/30/2021

**2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)	✓		

# Tampa Transflo Terminal Inspection Report

Inspection Date: 03/30/2021

## 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

Sarah M Brownlee

**Principal Investigator Name**



**Principal Investigator Signature**

Inspector

**Principal Investigator Title**

DEP

**Organization**

04/20/2021

**Date**

Leslie Pedigo

**Inspector Name**

Environmental Consultant

**Inspector Title**

DEP

**Organization**

Kevin Roberts

**Representative Name**

Railway Manager

**Representative Title**

Road & Rail Services

**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:** Michael C Lynch

**Inspection Approval Date:**

04/21/2021





03/30/2021

**SPILL  
RESPONSE KIT**  
EMERGENCY USE ONLY

03/30/2021

IMMEDIATE  
FIRE AWAY

NO SMOKING

ROCKWELL  
7704 2879958

USED  
ABSORBENT  
PADS

WOLFG 42C

USED ABSORBENT PADS

EMPTY

USED OIL

03/30/2021



FOR USED OIL ONLY  
Do not place any materials  
other than used oil into this tank

ABSORBENT PADS

50%

USED  
OIL

USED OIL

USED ABSORBENT PADS

USED  
OIL  
FILTERS

NAPA

SAE  
MINERAL OIL

NAPA

HYDRAULIC OIL

03/30/2021



USED FILTERS

USED  
OIL  
FILTERS

WHITMORE'S

QUICKLOK-GLT 10

R40  
HYDRAULIC OIL

03/30/2021



DRY  
SWEEP

USED DRY SWEEP

COUNTYLINE

03/30/2021

**HAZARDOUS  
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF YOU ARE CONTACTED FOR HAZARDOUS WASTE OR  
IF YOU SUSPECT A VIOLATION OF THE  
U.S. ENVIRONMENTAL PROTECTION ACT

REPORT TO:  
FEDERAL GOVERNMENT  
STATE GOVERNMENT  
LOCAL GOVERNMENT

NAME  
ADDRESS  
CITY  
STATE  
ZIP

DATE  
TIME  
PHONE

REPORT MADE BY  
REPORT MADE AT  
REPORT MADE ON

CONTAINS HAZARDOUS OR TOXIC WASTE  
**HANDLE WITH CARE!**

XXXXXXXXXXXXXXXXXXXX

03/30/2021