



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

FACILITY INFORMATION:

Facility Name: Freehold Cartage Inc
On-Site Inspection Start Date: 06/04/2021 **On-Site Inspection End Date:** 06/04/2021
ME ID#: 16638 **EPA ID#:** FLD984187831
Facility Street Address: 520 Beechcraft Street, Bartow, Florida 33830
Contact Mailing Address: 520 Beechcraft St, Bartow, Florida 33830
County Name: Polk **Contact Phone:** (863) 533-4599

NOTIFIED AS:

SQG (100-1000 kg/month), Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: SQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** 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:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH), Mercury containing devices (LQH) - 100kg or more accumulated, Mercury containing lamps (LQH) - 2000kg or more accumulated

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Hazardous Waste Transfer Facility Facility
Routine Inspection for SQG (100-1000 kg/month) Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for Universal Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kiana Sladicki, Inspector
Other Participants: Alexander Miranda, Environmental Specialist I; Michael Hirst, Terminal Manager

LATITUDE / LONGITUDE: Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On June 4, 2021, Freehold Cartage, Inc. ("FCI"), was inspected by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with hazardous waste and used oil management rules. The facility was last inspected by the Department's hazardous waste section on February 19, 2019. Mr. Michael Hirst, Terminal Manager, accompanied the Department inspectors throughout the facility.

Process Description:

FCI is a registered hazardous waste, used oil, used oil filter, and universal waste transporter and transfer facility. FCI has 35 employees (30 drivers and five administration) at this location, and the hours of operation are typically Monday to Friday from 7AM - 6PM. The facility seldom transports used oil and no longer operates waste tankers out of this location. The last used oil transportation occurred on November 7, 2019. FCI screens all drums of used oil with Dexsil Clor-D-Tect testing kits prior to pick-up. If the used oil fails the halogen test, FCI has the option to either reject the drum or request a hazardous waste manifest. No consolidation or mixing of

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hazardous waste and used oil is conducted on-site. Hazardous waste containers are stored up to 10 days within storage trailers. FCI keeps track of how long hazardous waste containers are onsite on Excel Spreadsheets, indicating the generator, manifest tracking number, day received, day that the waste must be transported, and the actual date of transportation. The facility is no longer on septic and is connected to City water and sewer. The walkthrough of the facility was as follows:

DOCK

After the 2015 Department inspection, FCI expanded their transfer loading dock and the paved containment storage area. The dock area is equipped with an eyewash station, four fire extinguishers, and is fenced and locked. The facility has also transitioned to LED lighting. There is one forklift that is serviced by Florida Forklift. FCI maintains 35 trucks and the dock has 16 bays; each truck that is docked in a bay is loaded with waste containers as they arrive to the facility and are divided based on like-wastes and treatment, storage, and disposal ("TSD") facility. There were also two sealed/tamper proof trucks holding retail related waste located on the containment pad, which arrived from Clean Earth.

RECORDS

The contingency plan, training records, transfer log, and manifests were reviewed during the inspection. No discrepancies or errors were noted during the manifest review. FCI is due for annual training this year, which will take place in mid June.

On February 12, 2021, FCI had scheduled outgoing shipments of hazardous waste from their Bartow transfer facility to Clean Harbors el Dorado Arkansas, within the 10-day storage time limit requirement. Due to a severe snow storm in Arkansas during that time FCI requested the Department for an extension on March 1, 2021, of the 10-day storage time limit and submitted a letter from the Governor of Arkansas, proclaiming a state of emergency,

FCI had two rejected loads of hazardous waste, manifest tracking number 013308321JJK with shipment date of March 23, 2021, and manifest tracking number 021135067JJK with shipment date of March 25, 2020. Both loads were returned to the generator.

FCI noted that multiple TSD facilities have not been accepting confirmed delivery slots, and is concerned that the 10-day storage limit may be exceeded in the future; no exceedances were noted for this reason as of the date of this inspection report. This is not an act that is extensible under 403.727; however the Department acknowledges FCI's concerns and is aware of the potential issues.

PHOTO ATTACHMENTS:

Overview of the Dock



Overview of the dock



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Inside of one truck



Drums awaiting trailer assignment



Eyewash station



Conclusion:

At the time of the inspection, FCI was in compliance with rules and regulations applicable to hazardous waste transport and transfer, used oil transport and transfer, small quantity generators or hazardous waste, and universal waste transport facilities.

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6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

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6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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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

Kiana Sladicki

Principal Investigator Name**Principal Investigator Signature**

Inspector

Principal Investigator Title

DEP

Organization

06/08/2021

Date

Alexander Miranda

Representative Name

Environmental Specialist I

Representative Title

FDEP

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.

Michael Hirst

Representative Name

Terminal Manager

Representative Title

Freehold Cartage, Inc.

Organization

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Report Approvers:**Approver:**

Michael C Lynch

Inspection Approval Date:

06/08/2021