



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

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC
On-Site Inspection Start Date: 06/10/2021 **On-Site Inspection End Date:** 06/10/2021
ME ID#: 28736 **EPA ID#:** FLD984262410
Facility Street Address: 1300 NE 48th St, Pompano Beach, Florida 33064-4909
Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, Illinois 60123
County Name: Broward **Contact Phone:** (847) 783-5355

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Hazardous Waste Transfer Facility Facility
Routine Inspection for VSQG (<100 kg/month) Facility
Routine Inspection for Universal Waste Transporter Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Justin Stark, Inspector
Other Participants: Juliana Reis, Environmental Specialist II; Jason M. Gipe, Branch Sales Manager

LATITUDE / LONGITUDE: Lat 26° 17' 22.5635" / Long 80° 6' 23.2854"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On June 10, 2021, Justin Stark with the Florida Department of Environmental Protection ("FDEP") conducted a Compliance Evaluation Inspection ("CEI") at Heritage Crystal-Clean LLC (hereinafter "HCC" or "facility"), located at 1280 NE 48th St, Pompano Beach, FL 33064. HCC was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations ("C.F.R.") Parts 260-268, 273, and 279, adopted and incorporated by reference in Rule 62- 710, 62- 730, and Rule 62-737, Florida Administrative Code ("F.A.C."). The inspector was accompanied by Juliana Reis, FDEP.

The inspector was escorted around the facility by Jason M. Gipe, Branch Sales Manager. Upon arrival at the facility, the inspector presented their credentials and explained the purpose of the inspection.

HCC is situated on a 4-acre site and is connected to municipal water and sewer. HCC has been operating at this location since 1993 and has 11 employees.

Notification History:

HCC initially notified with the FDEP as a Very Small Quantity Generator ("VSQG") and used oil transporter on 02/12/1993. The facility was assigned the EPA Identification ("EPA ID") Number FLD984262410. The facility recently notified on 2/12/2021 as a VSQG, used oil/hazardous waste transporter and transfer facility, and a universal waste transporter.

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Inspection History:

The facility was inspected by the FDEP on 02/26/2019 and found to be in compliance.

The facility was inspected on 6/7/2018. During the inspection, the facility was found to be out of compliance for failure to provide final signed copies of manifests to the generators, using a "Bill of Lading" for small quantity generators (SQGs) of hazardous waste, failure to maintain an SPCC and the EPA ID number for receiving facility of used oil transported by HCC, failure to maintain weekly container inspection logs, and to notify the local authorities of the arrangements with the local police, fire department, hospital, and emergency responders. These violations were corrected and resolved via a Short Form Consent Order. 2/11/2016 - HCC was inspected by the Department and three (3) violations were observed. The violations were resolved without formal enforcement action on 4/6/2016.

Personal Protective Equipment (PPE) was not required to enter the facility. Department personnel were equipped with steel-toed boots and a facial mask.

Process Description:

HCC operates as a hazardous waste/used oil transporter and transfer facility, and a universal waste transporter.

The facility consists of a secondary containment pit, offices, and a small parking lot. The HCC facility is completely surrounded by walls and a front security fence with security cameras.

HCC operations for used oil and hazardous waste transportation and transfer facility activities are the following:

- >Used oil; all used oil picked up is taken to a rail car located in Fort Lauderdale where its transported to one of HCC's permitted facilities around the U.S.
- >Hazardous waste; all hazardous waste is picked up from HCC clients and is held onsite for less than 10 days. The hazardous waste is then taken to one of HCC facilities located in Atlanta, Georgia (EPA ID: TLR000130062) or Sumter South Carolina (EPA ID: SCD036275626).

HCC has erected a free standing loading dock approximately 75 feet from the facility's east wall (Picture#1). This area is used to transfer used or oily water between fleet trucks. The whole area is within secondary containment. Storm drains were observed in the secondary containment for excess rainfall, the storm drains do not discharge outside the secondary containment and are pumped by HCC when they become full. HCC conducts weekly inspection of the storm drain to ensure no sheens are observed.

Hazardous Waste Transfer Facility activities:

Three trailers have been designated to hold the following:

- >Trailer #1 is used to hold hazardous waste (Picture #2).
- >Trailer #2, is used to hold hazardous waste.
- >Trailer #3 is used to hold used oil and used oil filters that are transported to U.S. Foundry (EPA ID FLD004128336).
- >Trailer #4 is used to store only products (virgin solvent).

All containers holding hazardous waste, used oil, and used oil filter were observed to be closed and properly labeled.

HCC fleet:

- >Three (3) trucks of 10,000 gallons capacity.
- >Three (3) box trucks for HW containers.
- >One (1) box truck for used oil filter containers.
- >One (1) vacuum truck of 3,500 gallons.

All the trucks have on their documentation their current registration, spill kits, DOT numbers and halogen screening tools.

Storage Area (Picture #3):

Oily waste and filter drums are no longer stored or processed in the Drum Storage and Processing Area. Area;

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these operations stopped in 2015. The area has been pressure washed and cleaned. The area is currently used to store HCC product, including virgin part washer mineral spirits, aqueous part washer fluids, new absorbent materials and new drums. During the inspection, the inspectors observed that this area is designated just for products (approximately 50 - 55 gallon drums).

Preparedness and Prevention measures:

Spill kits, internal communication procedures, emergency phone numbers and fire extinguishers are stationed throughout the facility for easy access and all employees carry cellular phones.

Record Review:

All permits and documentation required by the inspectors were available for review on site. The inspectors reviewed the following:

Manifests and Bill of Ladings:

Acceptance and delivery records for used oil activities - No discrepancies were observed.

Hazardous waste manifests - The facility maintain a note book for each shipment of hazardous waste received at this location in order to comply with the 10-days storage timeframes. No discrepancies were observed; However, the inspectors observed the wrong EPA ID number listed for the designed facility on bill of ladings. It is recommend that HCC uses the correct EPA ID for its designed facility on the bill of lading.

During the records review, it was observed that HCC used the EPAID ILR000130062 for all transportation activities at this location. While this is the EPAID for the corporate office, the facility shall use the assigned EPA ID for the Pompano Beach location (FLD984262410). This was mentioned to the facility during the 2018 inspection.

Inspections:

The facility does conduct and document weekly and daily inspections of hazardous waste containers, secondary containment, and the entire facility. Records are maintain onsite for at least three years.

Contingency Plan:

The facility maintains a full contingency plan/ SPCC Plan that includes emergency contact information, an evacuation map, emergency response and preparedness procedures. The facility could demonstrate that the appropriate arrangement with the local police, fire department, hospital, and local emergency response agencies have been made.

Training:

The facility conducts initial and annual training for used oil and hazardous waste management and records are maintain onsite.

Waste Analysis Plan

HCC has a written standard operating procedure for halogen testing. The facility keeps samples for 90 days. Rejected wastes are also kept in this folder. Three years worth of records are maintained onsite.

Closure Plan:

The plan was observe to be complete and up to date.

Insurance:

Certificate of Liability appeared to be up to date. HCC pollution control under Policy # IEPICB9067001 covers \$5M.

Annual Report:

Annual Report for Used Oil and Used Oil filters for the last three years were reviewed and appeared in order. The facility collected a total of 1,287,731 gallons of used oil and oily waste.

PHOTO ATTACHMENTS:

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Picture #1



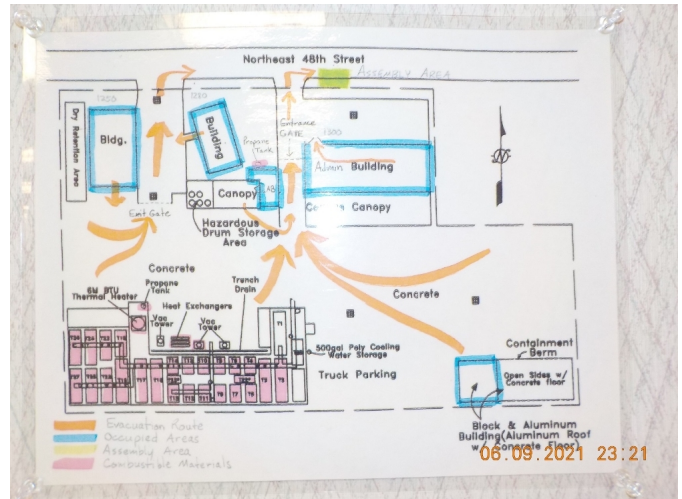
Picture #2



Picture #3



Picture #4

**Conclusion:**

HCC was inspected as a hazardous waste/used oil transporter and transfer facility, and a universal waste transporter and found to be in compliance during the time of the inspection.

An exit interview was sent on 06/11/2021 requesting additional records. The facility submitted documentation on 6/23/2021.

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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

Justin Stark**Principal Investigator Name**Environmental Specialist II**Principal Investigator Title****Principal Investigator Signature**FDEP**Organization**07/28/2021**Date**Juliana Reis**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Jason M. Gipe**Representative Name**Branch Sales 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.

Report Approvers:**Approver:**Alannah B Irwin**Inspection Approval Date:**07/28/2021