



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

April 20, 2022

Mr. Ryan Prewitt  
Transflo Terminal Services, Inc.  
500 Water Street #J-975  
Jacksonville, FL 32202  
[rprewitt@transflo.net](mailto:rprewitt@transflo.net)

**Re: Jacksonville Transflo Terminal**  
**EPA/DEP ID: FLD984253526**  
**Duval County – Hazardous Waste**

Dear Mr. Prewitt:

Department personnel conducted a compliance inspection of the above-referenced facility on February 10, 2022. Based on the information provided during and following 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 Cheryl Mitchell at (904) 256-1620 or via e-mail at [cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

cc: Mr. Sean Bessette, Precision Terminal Logistics, Terminal Manager ([sbessette@precisiontl.com](mailto:sbessette@precisiontl.com))  
DEP internal: Joni Petry, Bonnie Bradshaw, Cheryl Mitchell



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

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**FACILITY INFORMATION:**

**Facility Name:** Jacksonville Transflo Terminal  
**On-Site Inspection Start Date:** 02/10/2022      **On-Site Inspection End Date:** 02/10/2022  
**ME ID#:** 21835      **EPA ID#:** FLD984253526  
**Facility Street Address:** 3796 Warrington St , Jacksonville, Florida 32254  
**Contact Mailing Address:** 500 Water St #J975, Jacksonville, Florida 32202-4423  
**County Name:** Duval      **Contact Phone:** (904) 259-2279

**NOTIFIED AS:**

Transfer Facility, Transporter, Used Oil, VSQG

**WASTE ACTIVITIES:**

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

**INSPECTION TYPE:**

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

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector  
**Other Participants:** Bryan Trexler, Terminal Manager

**LATITUDE / LONGITUDE:** Lat 30° 19' 34.8335" / Long 81° 43' 10.1917"

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Jacksonville Transflo Terminal (Transflo, the facility) was inspected on February 10, 2022. The facility was previously inspected by the Department's Hazardous Waste Program on February 16, 2018. The facility is currently registered with the Department as a Hazardous Waste Transporter and Transfer Facility, a Used Oil Transporter and Transfer Facility, and a Very Small Quantity Generator (VSQG) of hazardous waste. The facility is currently operating as a Used Oil Transfer Facility and non-handler of hazardous waste, but prefers to maintain a current registration as a Hazardous Waste Transporter and Transfer Facility, and as a VSQG in the event that operations change in the future.

Transflo operates as a rail-to-truck or truck-to-rail transfer point for various product materials including hydrogen peroxide, dry commodities, and tall oil; and operates as a truck-to-rail transfer of used oil. The facility operates 6 a.m. to 6 p.m. on Monday through Friday and has been in operation at this location, under various names, for more than 30 years. CSX Transportation owns the property and Transflo leases the property. Day-to-day terminal operations and equipment maintenance operations are managed via contracted services. The current contractor is Precision Terminal Logistics who employs seven contractor employees at the facility.

Transflo is a subsidiary of CSX Transportation (FLD006921340); however, the two entities operate independently of one another. CSX operates the locomotives that move the used oil rail cars and the product rail cars that are loaded or offloaded at Transflo. Rail cars are independently owned or leased by individual shipping companies that use the terminal for transfer operations. The facility is connected to city water and has

## Jacksonville Transflo Terminal Inspection Report

Inspection Date: 02/10/2022

a septic tank. Mr. Bryan Trexler, Precision Terminal Logistics, Terminal Manager, was present throughout the inspection. The facility is approximately nine acres in size and consists of a small building with office spaces, a rail yard, and a minor maintenance shop area. The areas inspected are described below.

### Process Description:

#### Rail Yard

The facility has five loading tracks, Tracks 1 – 5, but Track 5 is currently out of service for repairs. Used oil is only received for truck-to-rail transfers into one or two cars that are staged on Track 1. This track is also used for rail transfers of raw products. Track 2 is used to receive product peroxide liquids, Track 3 is used to receive other products including tall oil, and Track 4 is used to receive dry bulk products. Products typically arrive by rail and are transferred to trucks for distribution. Transflo currently accepts used oil only from Heritage Crystal Clean (HCC, FLR000154278). HCC transports used oil in trucks to the rail yard where it is transferred into rail cars by Transflo contractor personnel. Used oil rail cars have a capacity of approximately 28,000 gallons, and they are loaded with used oil over numerous trips. To ensure the rail cars do not remain on-site longer than 35-days, Transflo notifies HCC when the rail car either approaches capacity or when day 35 is approaching. HCC is responsible for coordinating off-site shipment via CSX who arranges for the movement of the rail cars. The facility maintains a log book on-site that documents the rail car number, the date of the first off-load, the total amount off-loaded, the anticipated date of removal, and the actual date of removal. There was no used oil accumulating on Track 1 at the time of the inspection.

Secondary containment drip pans are provided beneath the rail cars to catch drips and/or spills that may occur during loading and spill kits are staged in between Tracks 1 and 2.

#### Maintenance Shop Area

Mr. Trexler stated that minor maintenance is only performed on the facility's tractors in this area (Photo 2). Maintenance on the facility's pumpers and conveyors is performed by outside contractors who manage any waste generated during those activities. At the time of the inspection, one 55-gallon drum of used oil was accumulating (Photo 3), and two 5-gallon buckets of used oil filters were accumulating. All containers were closed, properly labeled, and located within secondary containment. No hazardous waste is generated in this area. All shop rags are laundered through Cintas.

Mr. Trexler stated that the facility infrequently uses paint for minor touch-up of the equipment and facility, and to apply traffic markings in the rail yard. Various types of oil-based paints and aerosol can spray paints were observed in a flammable locker in the area. Mr. Trexler stated that any unusable paint and aerosol cans would be properly disposed as hazardous waste. The facility is reminded that an accurate waste determination should be made on any waste paint and waste paint debris at the point of generation to ensure proper disposal. This may include using the data provided on SDSs and/or testing a representative sample of the wastestream that is generated. Additionally, even spent aerosol cans may contain liquid product and/or flammable propellants which can cause the aerosol can to be a D001 and/or other hazardous waste. Aerosol cans with broken or clogged nozzles may be considered a hazardous waste. Unless an aerosol can is completely empty of both liquid and propellant, as defined in 40 CFR 261.7, it should not be thrown into the trash. All unusable and spent aerosol cans should either be safely punctured and properly drained into a closed container which should then be managed as hazardous waste, or be placed unpunctured into a closed container which should then be managed as a hazardous waste. Alternatively, the facility may choose to manage hazardous waste aerosol cans as a universal waste, provided they meet the requirements of 40 CFR 273.

#### Records Review

At the time of the inspection Transflo was operating only as a Used Oil Transfer Facility and non-hazardous waste generator. Records reviewed included the previous three years of rail car delivery/shipping logs, personnel training records, Used Oil Transporter/Transfer Facility registration and insurance certificates, and disposal records for used oil/oil filters generated on-site. Based on the facility's records, no rail cars had accumulated used oil on-site for greater than 35 days. The most recent shipment of used oil and used oil filters generated by the facility was managed on June 25, 2019, by Clean Harbors Environmental Services (MAD039322250). All records reviewed appeared to be in order.

## Jacksonville Transflo Terminal Inspection Report

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Copies of Northeast District's Hazardous Waste Generator Workshop PowerPoint training documents and other workshop files that may be useful can be found here:

<ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/SQG%20WORKSHOP/>  
and

<ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/TRA%20WORKSHOP/>

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### PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Inspection Date: 02/10/2022

**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: 02/10/2022

**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

Cheryl L Mitchell**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**04/17/2022**Date**Bryan Trexler**Representative Name**Terminal Manager**Representative Title**Precision Terminal Logistics**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:**Cheryl L Mitchell**Inspection Approval Date:**04/17/2022