



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

---

**FACILITY INFORMATION:**

**Facility Name:** Clean Harbors Florida LLC  
**On-Site Inspection Start Date:** 04/08/2022      **On-Site Inspection End Date:** 04/08/2022  
**ME ID#:** 50782      **EPA ID#:** FLD980729610  
**Facility Street Address:** 7001 Kilo Ave, Bartow, Florida 33830-6672  
**Contact Mailing Address:** 7001 Kilo Ave, Bartow, Florida 33830-6672  
**County Name:** Polk      **Contact Phone:** (863) 519-6331

**NOTIFIED AS:**

LQG (>1000 kg/month), Pharmaceuticals Reverse Distributor, TSD Facility, Transfer Facility, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** LQG **Other Status:** Importer **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer **Used Oil:** On-Spec, Oil Filters **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Containing Lamps, Mercury Containing Devices **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:** 5000 kg or more; Large Quantity Handler (LQH)

**Hazardous Waste Pharmaceuticals:**

Pharmaceutical Activities: Reverse Distributor

**INSPECTION TYPE:**

Routine Inspection for TSD Facility Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Warren McNelley, Inspector  
Leslie Pedigo, Environmental Consultant; Robert Denoux, Environmental Specialist I;  
**Other Participants:** John Bosek, Facility General Manager

**LATITUDE / LONGITUDE:** Lat 27° 57' 20.2397" / Long 81° 46' 45.0001"

**NAIC:** 562211 - Hazardous Waste Treatment and Disposal

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Clean Harbors Florida, LLC -Bartow (Clean Harbors - Bartow) was inspected on April 8, 2022, by the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility initially notified as a generator of hazardous waste on June 28, 1982 under the name International Solvent Recovery. The facility has been inspected numerous times by the Department, most recently on August 5, 2020. The facility is currently notified as a Large Quantity Generator, a Universal Pharmaceuticals Reverse Distributor, Importer and Large Quantity Handler. John Bosek, General Manager, accompanied the inspectors during the inspection and provided records.

Clean Harbors - Bartow is a permitted hazardous waste storage facility. The facility's operating permit, Hazardous Waste Operation Permit No. 64247-HO-018/Solid Waste Permit No. 64247-SO-020 was effective November 16, 2021 and expires December 10, 2026. The permit authorizes container and tank storage of hazardous waste, as well as fuel blending activities. In addition to the permit, Clean Harbors has the following certifications/registrations/permits:

## Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

- Hazardous Waste Transporter; the newest certification was submitted to the Department on February 8, 2022 for processing. Department staff in Tallahassee have verified the receipt of this certification.
- Used Oil/Used Oil Filter Transporter, Used Oil/Used Oil Filter Transfer Facility, and Used Oil Marketer registration was submitted to the Department on February 8, 2022 for processing. Department staff in Tallahassee have verified the receipt of this certification.
- Transporter of Universal Waste Lamps and Devices, Transfer facility for Universal Waste Lamps and Universal Waste Devices and a Large Quantity Handler Facility for Universal Waste Lamps and Devices; the current registration expires on March 1, 2023.
- Pharmaceutical Destruction Registration was issued by the State of Florida on February 18, 2021, and will expire on March 31, 2023.
- TSCA Permit for PCB #FLD980729610 was effective 6/13/2013 and expires on June 13, 2023.
- DEA Pharmaceutical Reverse Distribution, effective July 30, 2021 and will expire on August 31, 2022.

### Process Description:

The facility is located on a 10-acre parcel owned by the City of Bartow Municipal Airport. The facility contains five main buildings (the Operations Office and Laboratory Building, the Maintenance Building, the North Container Storage Building, the Boiler Building, and the South Container Storage Building) and other structures. The facility is open from 7:00 am to 5:00 pm, Monday through Friday. The facility utilizes the City of Bartow's water and sewer system. Currently there are approximately 65 employees; 20 are assigned to Plant Operations while the remainder work in Remedial Services, Field Services (customer pickups), National Transportation (truck drivers) or in the office. Few processes have changed at this facility since it was last inspected by the Department.

In order to track incoming and outgoing wastes, the facility uses a labeling and container bar coding system which is linked to the incoming and outgoing manifests and references the approved waste profiles for each of the facility's customers. If problems are detected during checks conducted under the facility's waste analysis plan, Clean Harbors contacts the generator to resolve the situation. On occasion, the facility receives unmanifested waste transported on bills of lading; Clean Harbors provides unmanifested waste reports to the Department for these shipments. Hazardous wastes are stored in the North Container Storage Building, the South Container Storage Building or in the Hazardous Waste Tanks. Most hazardous waste is shipped directly to the designated facility or sorted at the facility to consolidate shipments to the designated facilities.

Two propane powered forklifts are used at this location; and outside contractor, Southern States Toyotalift Forklift Dealership, conducts the maintenance on this equipment. Emergency equipment was in place throughout the facility and regularly inspected and well maintained.

### MAINTENANCE BUILDING

The Maintenance Building, which houses both the Field Services and Facility Maintenance, is located on the north side of the facility. No wastes are stored in the Field Services section of the building, only general facility products. No universal wastes were observed on site at the time of inspection.

### LOW EXPLOSIVE MAGAZINE

Consumer fireworks collected from retail locations may be stored in a low explosives magazine that now occupies a previously authorized roll off storage location, south of the North Container Storage Building.

### NORTH CONTAINER STORAGE BUILDING

The North Container Storage Building was within permitted capacity. Containers were managed in rows of pallets in accordance with the permit. Containers were closed, labeled with the words "hazardous waste" and an accumulation start date, and were in good condition. Hazardous waste containers were properly labeled with an indication of the hazards of the contents in accordance with the requirements in 40 CFR 262.17 (a)(5)(B). However, a number of containers also included a DOT Class 9 label. At the time of the inspection, Department personnel discussed the following with facility personnel:

Guidance provided by the EPA in recent meetings, DOT Class 9 Labels are not acceptable to meet this requirement as this label only indicates that the container contains "miscellaneous dangerous goods," and not an indication of the hazard of the waste. However, as an appropriate indication of the hazards of the contents was also included on the containers, it was determined that all necessary labeling requirements were met.

Containers of transfer waste were stored in designated areas, and none were found to have been held on site for more than 10 days during the course of transfer. In order to prepare for off-site container shipments, a pick

## Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

list is selected depending on the designated facility, and the container bar codes are checked against the pick list when the container is staged for loading. Transfer waste and outgoing loads are staged in accordance with USDOT compatibility criteria prior to loading into semi-trailers.

The container inventory of the North Storage Building was found to be 58,013 gallons on April 11, 2022.

### SOLID WASTE SHREDDER AND MIX TUB STATION

The facility permit authorizes operation of a solid waste shredder and solidification tub; this equipment is located on the west side of the facility. The Department conducted a Solid Waste Program inspection of this unit on July 10, 2020. A copy of the inspection can be found under the Solid Waste ID #WACS 101281.

### BOILER BUILDING

The Boiler has been removed from the Boiler Building and the building is used for material storage; no wastes are stored in this building.

### USED OIL MANAGEMENT AND FUEL BLENDING

Two 5,800-gallon used oil aboveground storage tanks are located on the western side of the facility, south of the Boiler Building. This process is no longer being conducted at the facility and the tanks are empty with the exception of residual sludge in the bottom of the tanks. These tanks are registered with the Storage Tank Program under Facility ID # 9602192 and are designated at Tank 700 and Tank 701.

### SOUTH STORAGE BUILDING

At the time of inspection, there were large quantities of wastes in the South Storage Building. This building is currently utilized as a storage and staging area for solid wastes, universal wastes, and hazardous wastes that are destined for on-site processing or shipment. Waste fuel and lean water stored in this area are pumped into one of the five active Hazardous Waste Storage Tanks located on the north side of the South Storage Building. The solid waste accumulated in this area is treated in the Solid Waste Shredder and Mix Tub and sent for disposal at landfills as solid waste.

The container inventory of the South Storage Building was found to be 71,903 gallons on April 11, 2022.

### HAZARDOUS WASTE TANKS

The tank farm, located north of the South Container Storage Building, contains ten hazardous waste aboveground storage tanks, designated at T-101 through T-110. Each of these tanks are 6,000-gallons in size. The hazardous waste storage tanks have a cone bottom and are not agitated. The entire content is transferred to a bulk tanker for transport either to a disposal facility or to the CSX Transflo intermodal transfer facility where rail cars are loaded.

The facility's tank system was in compliance with Subpart J requirements. Valves and flanges were tagged as required by 40 CFR 264 Subparts AA and BB. Inspections and emissions monitoring are being conducted in accordance with the permit, and records are maintained.

Five of the ten tanks are out of service, and the other five are in operation. The five operational tanks were properly labeled and their waste quantities are as follows:

- T-105; containing 5,922 gallons of blending liquid for fuel.
- T-106; containing 5,718 gallons of blending liquid for fuel.
- T-108; containing 4,193 gallons of fuel.
- T-109; containing 5,435 gallons of lean water for incineration.
- T-110; containing 5,800 gallons of lean water for incineration.

### OPERATIONS OFFICE AND LABORATORY BUILDING

If samples are collected as part of the waste analysis plan checks, the samples are bar coded with the same code as the container and are transferred to the facility's lab which is located in the Operations Office and Laboratory Building. After the analyses are complete, and it is determined that there is no need to retain a sample, they are discarded into one of three containers in the satellite accumulation area: a 30-gallon metal drum for waste flammable liquids; a 55-gallon polypropylene drum for waste solid debris; and a 30-gallon polypropylene drum for waste mixed PCB, flammable, corrosives or toxic liquids. Please note that, in accordance with 40 CFR 262.15(a), which was approved under the generator improvements rule, no more than 55-gallons of non-acute hazardous waste can be stored in a satellite accumulation area. As the total hazardous waste present in these drums was estimated to be less than 55-gallons in total at the time of the inspection, this

# Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

provision was not in violation. The containers were closed, contained hazardous waste labels and in good condition. Upon inspection of the hazardous waste label, an indication of the hazard was noted.

## RECORDS

- In the previous inspection of this facility in 2020, the facility lacked a quick reference guide in their contingency plan. At the time of this most recent inspection, the quick reference guide and all of its components were available and appeared complete upon review.
- Training records were reviewed and appeared complete and up to date.
- Manifests for all shipments of waste were available and appeared complete upon review.
- Upon review, the contingency plan met all requirements and appeared complete.
- Records of incoming and outgoing shipments of wastes were reviewed and appeared complete.

## PHOTO ATTACHMENTS:

North Container Storage Building.



The 10-Hazardous Waste storage tanks.



DOT 9 label, along with hazardous waste label.



Solid waste shredder and mix tub.



# Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

laboratory SAA area.

South Container Storage Building.



## Conclusion:

At the time of the inspection, Clean Harbors Florida LLC - Bartow was found to be in compliance with state and federal hazardous waste regulations. Solid waste processing operations were not evaluated during this inspection.

## Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

**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	✓		

## Clean Harbors Florida LLC Inspection Report

Inspection Date: 04/08/2022

**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

Warren McNelley	Inspector
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>
	DEP
<b>Principal Investigator Signature</b>	<b>Organization</b>
	04/28/2022
	<b>Date</b>
<hr/>	
Leslie Pedigo	Environmental Consultant
<b>Inspector Name</b>	<b>Inspector Title</b>
	DEP
	<b>Organization</b>
<hr/>	
Robert Denoux	Environmental Specialist I
<b>Inspector Name</b>	<b>Inspector Title</b>
	DEP
	<b>Organization</b>
<hr/>	
John Bosek	Facility General Manager
<b>Representative Name</b>	<b>Representative Title</b>
	Clean Harbors LLC
	<b>Organization</b>

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:**

<b>Approver:</b> Shannon Lenhart	<b>Inspection Approval Date:</b> 04/28/2022
----------------------------------	---