



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

Shawn Hamilton
Secretary

April 28, 2022

John Bosek, Facility General Manager
Clean Harbors Florida, LLC
7001 Kilo Ave
Bartow, FL 33830-6672
Bosek.john@cleanharbors.com

Re: Clean Harbors Florida, LLC
Facility ID No. FLD980729610
Polk County

Dear Mr. Bosek:

Department personnel conducted a compliance inspection of the above-referenced facility on April 8, 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 efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Warren McNelley at 813-470-5869, or via e-mail at: Warren.McNelley@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink that reads "Shannon Lenhart".

Shannon Lenhart
Environmental Manager
Southwest District
Florida Department of Environmental Protection

cc: Shannon Lenhart, DEP; Shannon.Lenhart@Floridadep.gov
Leslie Pedigo, DEP; Leslie.Pedigo@FloridaDEP.gov
Warren McNelley, DEP; Warren.McNelley@floridadep.gov
Jeff Curtis, Clean Harbors; Jeff.curtis@safety-kleen.com



**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

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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

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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.



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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.

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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	✓		

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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

Warren McNelley**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**04/28/2022**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Robert Denoux**Inspector Name**Environmental Specialist I**Inspector Title**DEP**Organization**John Bosek**Representative Name**Facility General Manager**Representative Title**Clean Harbors 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:** Shannon Lenhart**Inspection Approval Date:**04/28/2022

Set up instructions:

- A. Stand ClearPak upright.
- B. Open ClearPak until seal is broken.
- C. When full, gather liner and (minimum) of 3M 8573 (4mm).
- D. Close ClearPak caps, seal.



CASH

3/28/22

Walmart Supercenter

10.99

Barcode

01/01/2007



3/8/22
BW
AS01VZ50
[Barcode]
[Barcode]

HAZARDOUS WASTE
[Barcode]
[Barcode]



01/01/2007

Clean Pak™

1-800-CUBIC-YD

① 13W/X/11 20/US
13W/Y/11 20/US



2600 /1146
2600 /1382

Set up instructions:

- A. Stand CleanPak upright
- B. Open CleanPak until square
- C. When full, gather liner, twist clockwise one full revolution and secure closed with standard cable tie, mini
- D. Close CleanPak flaps across top

01/01/2007



3/8/22
UN
A601VZ50
CAUTION

UN1944
HAZARDOUS WASTE
FLAMMABLE SOLID
CAUTION



01/01/2007



4-200-CUBIC-YD

1

UN1993

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL OF SOLID, LIQUID, OR GASEOUS WASTE

NAME OF THE GENERATOR _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

PHONE _____

FACILITY _____ DATE _____ TIME _____

VOLUME _____ WEIGHT _____

CLASSIFICATION _____ DESCRIPTION _____

TREATMENT _____ STORAGE _____ DISPOSAL _____

COUNT AND TARE BEFORE USE

CAUTION

CAUTION

0/ USA / +AA8054 / 2600 / 1146
0/ USA / +AA8054 / 2600 / 1382



Set up instructions

- A. Stand CleanPak upright
- B. Open CleanPak until square
- C. When full, gather liner, twist clockwise one full revolution, and secure closed with standard cable tie, minimum 8" length
- D. Close CleanPak flaps across top and secure with attached polypropylene 3/4" ties
- 01/01/2007

01/01/2007



01/01/2007

HAZARD CLASS **UN3077**

HAZARDOUS WASTE

FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AGENCY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

NAME	UN3077	CLASS	UN3077
ADDRESS	Midwest Neighborhood Market 25-000		
LOCATION	2501 Mountain Road North		
CITY	Midvale	ST	UT
ZIP	84044	TEL	801-224-1100
DATE OF SHIPMENT	03/30/2007		
SHIPMENT NUMBER	00000000000000000000		
SHIPMENT DATE	03/30/2007		
SHIPMENT TIME	0000		
SHIPMENT TYPE	HAZARDOUS WASTE		
SHIPMENT CLASS	HAZARDOUS WASTE		
SHIPMENT CODE	HAZARDOUS WASTE		

CONTAINS HAZARDOUS OR TOXIC WASTE

3/30/22

3/30/22

BW

Profile: Toxic
Hazard: Toxic
Control: Toxic

A0027B9G

01/01/2007

HAZARD CLASS **UN3077**

HAZARDOUS WASTE

FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AGENCY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

NAME	UN3077	CLASS	UN3077
ADDRESS	Midwest Neighborhood Market 25-000		
LOCATION	2501 Mountain Road North		
CITY	Midvale	ST	UT
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DATE OF SHIPMENT	03/30/2007		
SHIPMENT NUMBER	00000000000000000000		
SHIPMENT DATE	03/30/2007		
SHIPMENT TIME	0000		
SHIPMENT TYPE	HAZARDOUS WASTE		
SHIPMENT CLASS	HAZARDOUS WASTE		
SHIPMENT CODE	HAZARDOUS WASTE		

CONTAINS HAZARDOUS OR TOXIC WASTE

3/31/22

3/31/22

BW

Profile: Toxic
Hazard: Toxic
Control: Toxic

A002849G

01/01/2007

HAZARD CLASS

UN3077

HAZARDOUS WASTE

FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING # 016907253RL		ACCOMPLISH DATE 01/01/2007	
GENERATOR Walmart Neighborhood Market #5365			
ADDRESS 3950 Wickham Road North			
CITY Melbourne		ST FL	ZIP 32905
CONTACT OF S.O.A. (PRINT NAME)		EPA HAZARD CODE	
21200011333		Toxic	
WASTE CODE 0000			
PROPERLY IDENTIFIED	DESCRIPTION	BLK AND SCNT 016, 015, 014, 013, 012, 011, 010, 009, 008, 007, 006, 005, 004, 003, 002, 001	USE CONTAINMENT
			CONTAMINATED

CAUTION

CONTAINS HAZARDOUS OR TOXIC WASTE

UNRECORDED - UNRECORDED

01/01/2007



01/01/2007



01/01/2007





01/01/2007



01/01/2007



10 DAY
READING

01/01/2007



01/01/2007



01/01/2007





01/01/2007



01/01/2007



WASTE

01/01/2007



01/01/2007



01/01/2007



01/01/2007



01/01/2007





01/01/2007



01/01/2007

T-604
STORM WATER

T-605
STORM WATER

01/01/2007



01/01/2007



01/01/2007

HAZARDOUS WASTE
UN1997
CAUTION



01/01/2007



01/01/2007

HAZARDOUS WASTE
WA3077
CAUTION

DATE	TIME
LOCATION	TIME
DESCRIPTION	TIME
REMARKS	TIME



01/01/2007



01/01/2007