



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

FACILITY INFORMATION:

Facility Name: NRC Gulf Environmental Services Inc
On-Site Inspection Start Date: 05/25/2022 **On-Site Inspection End Date:** 05/25/2022
ME ID#: 146050 **EPA ID#:** FLR000246041
Facility Street Address: 7112 E 7th Ave , Tampa, Florida 33619
Contact Mailing Address: 7112 E 7th Ave, Tampa, Florida 33619
County Name: Hillsborough **Contact Phone:** (813) 778-9979

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** Transporter, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Mercury containing devices (LQH) - 100kg or more accumulated Mercury containing lamps (LQH) - 2000kg or more accumulated

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Warren McNelley, Inspector
Leslie Pedigo, Environmental Consultant; Gregory Williams, Environmental Compliance
Other Participants: Manager

LATITUDE / LONGITUDE: Lat 27° 56' 40.2" / Long 82° 22' 22.8"

NAIC: 562998 - All Other Miscellaneous Waste Management Services

TYPE OF OWNERSHIP: Private

Introduction:

On May 25, 2022, NRC Gulf Environmental Services Inc. ("NRC") was inspected by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal hazardous waste rules and regulations. NRC first notified as a transporter of hazardous waste on April 7, 2022 and first notified as a used oil and used oil filter transporter on June 22, 2021. This was NRC's first time being inspected by the Department at this location. Gregory Williams, Environmental Compliance Manager, accompanied the Department inspectors throughout the facility.

Process Description:

NRC operates exclusively as a transporter of hazardous waste and does not treat, store, or dispose of hazardous wastes that are picked up from customers. At this location they have approximately 20 employees, and utilize the water and sewer of the City of Tampa. Drivers for NRC go to the specified facility, pick up wastes, and then immediately begin transit to the designated disposal site. NRC specializes in picking up hazardous wastes, landfill leachate, oily water, medical wastes, and used oil for transport to destination facilities. Shipments of wastes are transported via vehicles, as described below; wastes are not shipped via rail or sea. The facility consists of one office building, one maintenance warehouse, and a fleet yard where all heavy equipment and

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vehicles are kept.

OFFICE BUILDING

The office building houses the logistical operations and the record keeping for NRC. There is no hazardous waste stored or generated in this area.

MAINTENANCE WAREHOUSE

Preventative maintenance for NRC's vehicle fleet is conducted on site, and this generates used oil, used oil filters, lead-acid batteries, and antifreeze. Any major automotive maintenance work is conducted off-site with a third-party contractor. The Central Accumulation Area ("CAA") is located on the North side of the maintenance warehouse. At the time of inspection, the following containers were observed in the CAA: three full 55-gallon drums containing used oil, two 55-gallon drums still being filled with used oil, one 55-gallon drum of coolant, and one 55-gallon drum of used oil filters. All drums were in good condition and had the required labels. There is one 30-gallon Safety-Kleen parts washer located in the warehouse, and this parts washer is serviced quarterly by Safety-Kleen. Spent lead-acid batteries are properly stored in the warehouse and are collected by Interstate for core credit on an as needed basis. The warehouse utilizes two propane powered forklifts, and any maintenance on the forklifts is conducted off-site by Clark Forklift. All used tires generated on site are picked up by Boulevard Tires on an as needed basis. Employee uniforms are laundered through Cintas on an as needed basis.

FLEET YARD

The fleet yard is a large dirt lot that is used to store transport vehicles. NRC uses a wide variety of transport vehicles and they are as follows:

- F-150, F-250, and F-350 pick up trucks.
- Vac Trucks; these trucks are used for hazardous waste transport.
- Freightliner Press Vac; this truck is used for hazardous waste transport.
- Cusco/Stainless 3000 G; this truck is used for hazardous waste transport.
- Turbo Vac SS; this truck is used for hazardous waste transport.
- ER Trailers; these are used for hazardous waste transport.
- Tank Trailer and Trailer Vacuum Tanker; these two vehicles are used for the pick up of petroleum contaminated water.
- F-450 pick up trucks; these trucks are used to pick up and transport drums, including drums of hazardous waste.
- Roll off trucks; these trucks are used for the transport of hazardous waste. There are currently seven roll off trucks in NRC's fleet.
- ER Trailer; these trailers are used for the transport of both medical waste and hazardous waste.
- 48' double rail hauler; this vehicle is used for the transport of hazardous waste.

RECORDS

• Hazardous waste manifests were available for review on site. NRC has only been in operation at this location for approximately a year, and all manifests since on site operations began appeared complete. The most recent pickup was from Duke Energy (EPA ID#FLR000254599) on May 25, 2022 for five pounds of D008 hazardous waste. The shipment reached the designated facility, Chemical Waste Management (EPA ID#ALD000622464), on June 1, 2022.

• Annual driver training records were reviewed at the time of inspection and appeared complete. There are 15 CDL drivers at NRC and 13 of those drivers are certified to transport hazardous waste.

• All required registrations and permits are up to date and retained on site. NRC most recently registered as a Used oil transporter on April 6, 2022, most recently registered as a hazardous waste transporter on April 6, 2022, and most recently registered as a mercury handler on February 24, 2022.

PHOTO ATTACHMENTS:

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CAA with used oil being accumulated.

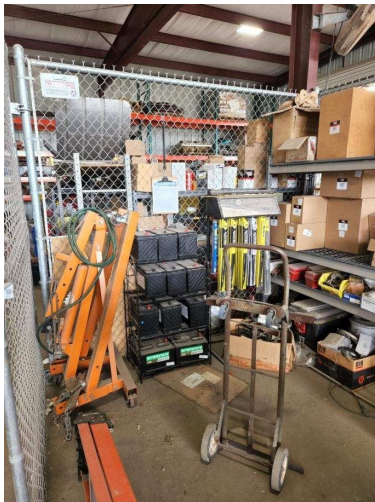


Maintenance warehouse, with lead-acid batteries

30-gallon safety-clean parts washer.



3300-gallon tank truck parked in fleet yard.



pictured.



Conclusion:

At the time of the inspection, NRC Gulf Environmental Inc. was operating in compliance with state and federal rules and regulations applicable to registered transporters of hazardous waste.

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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

Warren McNelley**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**06/15/2022**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Gregory Williams**Representative Name**Environmental Compliance Manager**Representative Title**US Ecology**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:**06/15/2022