



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

FACILITY INFORMATION:

Facility Name: Heritage-Crystal Clean LLC
On-Site Inspection Start Date: 05/26/2022 **On-Site Inspection End Date:** 05/26/2022
ME ID#: 95762 **EPA ID#:** FLR000170431
Facility Street Address: 9940 Currie Davis Dr #A44 , Tampa, Florida 33619-2669
Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, Illinois 60123
County Name: Hillsborough **Contact Phone:** (847) 783-5355

NOTIFIED AS:

Non-Handler, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Transporter Facility
Routine Inspection for Transfer Facility Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Non-Handler Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Sarah M Green, Inspector
Other Participants: Coral Evans, OPS Environmental Specialist I; Adam Mefferd, Branch Manager

LATITUDE / LONGITUDE: Lat 27° 57' 4.3165" / Long 82° 20' 27.7981"

NAIC: 488999 - All Other Support Activities for Transportation

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted at Heritage-Crystal Clean LLC ("HCC") on May 26, 2022 by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal regulations for transporters of hazardous waste and used oil. HCC has been inspected by the Department several times before, most recently on March 7, 2019. The facility last notified as a transporter of hazardous waste and used oil on February 28, 2022. Inspectors were assisted by Adam Mefferd, Branch Manager, during the inspection.

Process Description:

Heritage-Crystal Clean primarily manages drummed waste and services parts washers for customers in the Tampa Bay area. HCC is notified/registered as a non-handler of hazardous waste, a universal waste lamp and device transfer facility, a hazardous waste transporter, a hazardous waste transfer facility, a used oil transporter, a used oil transfer facility, a used oil filter transporter, and a used oil filter transfer facility. The facility consists of an office (recently renovated), warehouse, semi-truck trailers (four trailers total, one is used as a spare), and box trucks used for pickups. The facility has 11 employees including drivers and office staff, and is on City of Tampa water and sewer.

Inbound containers are tracked using a computerized barcoding system, which can also generate a daily

Heritage-Crystal Clean LLC Inspection Report

Inspection Date: 05/26/2022

inventory log. For outbound containers, the same system generates a bill of lading which accompanies the rest of the disposal documents to the final destination. This facility maintains digital inbound/outbound logs for waste that has already left the facility, and maintains paper copies of manifests and logs while the waste is still on site. Waste containers are moved from vehicle to vehicle only and are never stored inside the building. Facility indicated that generators claiming to be a very small quantity generator are verified using the Department's Handler Search web page before the waste is accepted.

All hazardous waste is transported under one EPA ID number federally from their facility located in Elgin, IL; EPA ID #ILR000130062. Hazardous and non-hazardous waste is transported to either Heritage Environmental Services LLC (EPA ID#IND093219012) or Giant Resource Recovery (EPA ID#SCD036275626) twice a week on Tuesdays and Thursdays for roughly 40,000-lbs of hazardous waste each shipment (80,000-lbs weekly).

At the time of the inspection, the facility had two trailers of outbound waste preparing for shipment. One trailer was prepped and ready to be shipped out the same evening of the inspection, the other was currently being loaded for shipment the following week. All observed containers appeared to be properly labeled and in good condition; waste loaded on the trucks included both hazardous and non-hazardous waste depending on destination facility. Facility provided lists of waste currently loaded on both trucks from their inventory log for inspector review.

Trucks and drivers maintain the required records while transporting including copies of registrations, proof of insurance, and spill response plans. Emergency and safety equipment were also available. Maintenance on trucks is performed by an outside vendor.

Inside the warehouse, the facility primarily stores materials to be sold to customers. There are new and used parts washers of various types and sizes. There are also paint gun washers, new antifreeze containers, containerized soaps, empty overpack containers, spill response equipment, and numerous empty containers. There are also three totes of concentrated soaps plus another tote containing water for dilution. The soaps are sold to customers in drums that are filled on site by HCC.

RECORDS

- A representative sample of hazardous and non-hazardous waste outbound/inbound manifests and receipts were reviewed and appeared complete.
- Hazardous waste training records were reviewed and appeared up to date. The facility performs several annual trainings including Hazwoper, RCRA management, and facility specific topics.
- The facility's contingency plan was reviewed, named "Facility Specific Emergency Action Plan", and appeared complete and accurate. Current emergency contacts were correct and was last updated on March 20, 2019.
- HCC completes a daily inventory log excluding non-working days which was available for review.
- Within the facility, an emergency contact list is posted, as were the used oil and hazardous waste transporter registrations.

PHOTO ATTACHMENTS:

Waste Prepared for Shipment



Waste Prepared for Shipment



Inspection Date: 05/26/2022

Labeling on Prepared for Shipment Drums



Conclusion:

At the time of the inspection, Heritage-Crystal Clean LLC was determined to be operating in compliance with state and federal regulations for transporters of hazardous waste and used oil.

Heritage-Crystal Clean LLC Inspection Report

Inspection Date: 05/26/2022

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)			✓

Heritage-Crystal Clean LLC Inspection Report

Inspection Date: 05/26/2022

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)			✓

Inspection Date: 05/26/2022

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

Sarah M Green**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**06/15/2022**Date**Coral Evans**Inspector Name**OPS Environmental Specialist I**Inspector Title**DEP**Organization**Adam Mefferd**Representative Name**Branch 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:**Shannon Lenhart**Inspection Approval Date:**06/15/2022