

From: [Hardin, Monica](#)
To: [Jeffrey Traynor](#); [Lynn Ballard](#)
Cc: [Jesse Andrews](#); [Richardson, Cliff J](#)
Subject: RE: hazardous waste inspection follow-up
Date: Tuesday, July 26, 2022 10:30:00 AM
Attachments: [FDEP Response 03242022 scan.pdf](#)
[FY 22-Feb 2022 Groendyke SR inspection report.pdf](#)
[image011.png](#)
[UDS Level 2 Analytical Final Report.pdf](#)

Hello All,

Please review the attached compliance assistance offer response you sent on March 24, 2022. We are unable to resolve the outstanding cited violation documented during the February 2022 inspection (report attached) as no waste determination has yet been provided. The time provided for return to compliance exceeds the normal Department allowance for documented non-compliance. Please review the corrective actions identified in the inspection report with the associated cited violation and provide the required information as soon as possible.

Based off the analytical results provided (attached), we would like to set up a call to further discuss this outstanding issue with you in an effort to meet resolution; Is there a time today, tomorrow, or next Tuesday (Aug. 2) that will work?

Thanks so much,



Monica Hardin
Florida Department of Environmental Protection
NWD-Compliance Assurance Program
Environmental Specialist
Monica.hardin@FloridaDEP.gov
Office: 850-595-0620



From: Jeffrey Traynor <jtraynor@groendyke.com>
Sent: Thursday, March 24, 2022 11:32 AM
To: Hardin, Monica <Monica.Hardin@FloridaDEP.gov>; Lynn Ballard <LBALLARD@groendyke.com>
Cc: Salley, Ethan F <Ethan.F.Salley@FloridaDEP.gov>; Jesse Andrews <jandrews@groendyke.com>; Richardson, Cliff J <Cliff.J.Richardson@FloridaDEP.gov>
Subject: RE: hazardous waste inspection follow-up

EXTERNAL MESSAGE

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responding to this email.

Monica,

As per our conversation earlier; please review the attached.

If you prefer I can send the original signed document to your attention.

Any questions, suggestions, or revisions: feel free to contact me at any time.

Thank you,

JEFF TRAYNOR
ENVIRONMENTAL COMPLIANCE
GROENDYKE TRANSPORT
OFFICE: 580-213-9240
MOBILE: 580-554-1301
www.Groendyke.com



From: Hardin, Monica <Monica.Hardin@FloridaDEP.gov>

Sent: Wednesday, March 23, 2022 1:49 PM

To: Lynn Ballard <LBALLARD@groendyke.com>

Cc: Salley, Ethan F <Ethan.F.Salley@FloridaDEP.gov>; Jesse Andrews <jandrews@groendyke.com>;
Jeffrey Traynor <jtraynor@groendyke.com>; Richardson, Cliff J <Cliff.J.Richardson@FloridaDEP.gov>

Subject: RE: hazardous waste inspection follow-up

Good Afternoon,

Per the Compliance Assistance Offer and the referenced inspection report sent to your facility on March 15, 2022 (attached for your reference), the Department is requiring a documented waste determination for the material observed in the 5-gallon bucket in the wash rack area during the inspection and the associated disposal records. Per [40 CFR 262.11](#): a person who generates a solid waste, as defined in [40 CFR 261.2](#), must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to the applicable RCRA regulations. Please review the rule citation to ensure your waste determination is made following the required steps.

Thanks so much,



Monica Hardin
Florida Department of Environmental Protection
NWD-Compliance Assurance Program
Environmental Specialist
Monica.hardin@FloridaDEP.gov
Office: 850-595-0620



From: Lynn Ballard <LBALLARD@groendyke.com>
Sent: Friday, March 18, 2022 2:41 PM
To: Hardin, Monica <Monica.Hardin@FloridaDEP.gov>
Cc: Salley, Ethan F <Ethan.F.Salley@FloridaDEP.gov>; Jesse Andrews <jandrews@groendyke.com>; Jeffrey Traynor <jtraynor@groendyke.com>
Subject: RE: hazardous waste inspection follow-up

EXTERNAL MESSAGE

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Good afternoon,

During the February 11, 2022 inspection of our facility at 5200 Sterling Way Pace, FL, a potential non-compliance was found concerning:

In the wash rack area, an open, unlabeled 5-gallon bucket containing sludge/dirt debris was observed. The facility indicated the material is removed from the grates in the wash rack unit and removed from the site by the liquid chemical provider.

Our corrective action is to label the 5-gallon bucket as non-hazardous material. This material is tested by our disposal vendor. Their invoice/report will serve as our disposal records of the debris.

If you have further questions or concerns, please give us a call.

Thanks.

Lynn Ballard
Executive Assistant/Environmental Specialist
lballard@groendyke.com
580/977-3306 direct
580/977-8213 cell

From: Hardin, Monica <Monica.Hardin@FloridaDEP.gov>
Sent: Tuesday, February 15, 2022 9:45 AM
To: Jesse Andrews <jandrews@groendyke.com>
Cc: Salley, Ethan F <Ethan.F.Salley@FloridaDEP.gov>; Lynn Ballard <LBALLARD@groendyke.com>
Subject: hazardous waste inspection follow-up

Good Morning Mr. Andrews,

Thank you for your time (and that of Mr. Edwards and the gentleman at the wash rack, I did not write down his name) during our hazardous waste (transporter) inspection last Friday February 11; your time and the information provided is much appreciated! There were a couple items we discussed that I wanted to outline.

At the wash rack, we observed a 5-gallon bucket holding what appeared to be sludge/dirt/debris. This bucket was described as material removed from the grate in the center of the building and it was explained this bucket is dumped into a drum; the company that delivers liquid chemical products then takes the drum when needed. This sludge appeared as waste of which we will need a waste determination to ensure appropriate disposal is occurring. Any information you can provide regarding this sludge/practice/disposal method will assist us in determining compliance.

In the maintenance shop, we discussed management of aerosol cans. You explained products in aerosol cans are used until gone and the cans are disposed in the trash. We then discussed 'RCRA empty'; if your facility chooses to ensure the cans are RCRA empty, we do strongly encourage recycling of the metal cans. I have included a link for RCRA empty. In addition, EPA has added aerosol cans to the universal waste rules, which Florida has adopted. Managing the waste aerosol cans generated at your facility may be a good option. If waste aerosol cans do not meet the definition of RCRA empty, they must be managed as universal waste or have a hazardous waste determination conducted.

Also, as a reminder all containers that hold used oil (including small transfer containers) must be labeled with 'Used Oil', likewise used oil filters containers must be clearly labeled with 'Used Oil Filters'.

[Universal Waste](#)

[RCRA Empty](#)

[DEP Hazardous Waste](#)

I will be drafting the inspection report over the next several weeks, any additional information you can provide on the above topics will assist us in determining compliance.

Please feel free to reach out if you have any questions.

Thanks so much,



Monica Hardin

Florida Department of Environmental Protection

NWD-Compliance Assurance Program

Environmental Specialist

Monica.hardin@FloridaDEP.gov

Office: 850-595-0620



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GROENDYKE TRANSPORT, INC.

TRANSPORTERS OF COMMODITIES IN BULK

GENERAL OFFICES
P.O. Box 632
ENID, OKLAHOMA
73702-0632
580/234-4663
800/843-2103
FACSIMILE
580/234-1216

24 March, 2022

Monica Hardin, Env. Specialist
FL Dept. of Env. Protection
NWD – Compliance Assurance Program
160 W. Government Street, Ste. 308
Pensacola, FL 32502
Monica.Hardin@FloridaDEP.gov

Re: Compliance Assistance Offer (11 Feb., 2022 Inspection)
Groendyke Transport, Inc.
EPA ID: FLR000193292
5200 Sterling Way
Pace, FL 32571

Ms. Hardin:

Thank you for your time earlier today.

As per our phone call, in order to comply with the violations of Florida Statutes chapter 62-730 and FAC / CFR Title 40 part 262 noted during your department's recent inspection Groendyke transport offers the following:

-Groendyke Transport will determine the waste status of dirt / sludge contained in the open 5-gallon bucket containing material pulled from grates and channels of the facility's tank wash rack.

-Proper waste determination will be made on this material, disposal recorded appropriately via manifests, and policy developed to ensure proper handling and disposal moving forward.

-Upon waste analyzation and disposal; documentation of same will be provided to your office for review and comment.

Please let me know if you have any suggestions or revisions to this remedy.
Any advice or pointers are appreciated, as the FDEP inspection helped highlight a potential shortcoming on our part to begin with.

Thank you,

A handwritten signature in blue ink, appearing to read 'Jeff Traynor', with a stylized flourish at the end.

Jeff Traynor
Env. Compliance
Groendyke Transport, Inc.
2510 Rock Island Blvd.
Enid, OK 73701
jtraynor@groendyke.com

From: [Lynn Ballard](#)
To: [Hardin, Monica](#)
Cc: [Jesse Andrews](#); [Richardson, Cliff J](#); [Ryan Gehrke](#)
Subject: RE: hazardous waste inspection follow-up
Date: Wednesday, July 27, 2022 11:47:53 AM
Attachments: [image003.png](#)

EXTERNAL MESSAGE

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Good afternoon, Monica

Per our conference call, below please find Groendyke's response for the February 11 inspection violation:

- 1 – Per the analytical lab report, the waste determination is that the product in the 5-gallon bucket is non-hazardous.
- 2 – US Ecology will schedule a vac truck to dispose of the non-hazardous product in accordance with regulations. This disposal process will continue on a regular basis.
- 3 – We will maintain the drum decal so that all containers remain identified.

Thank you so much for the help and direction in closing this violation.

Lynn Ballard
Environmental Manager
580-977-3306 office
580-977-8213 cell
lballard@groendyke.com

From: Hardin, Monica <Monica.Hardin@FloridaDEP.gov>
Sent: Tuesday, July 26, 2022 10:31 AM
To: Jeffrey Traynor <jtraynor@groendyke.com>; Lynn Ballard <LBALLARD@groendyke.com>
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[Universal Waste](#)

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Please feel free to reach out if you have any questions.

Thanks so much,



Monica Hardin

Florida Department of Environmental Protection
NWD-Compliance Assurance Program
Environmental Specialist
Monica.hardin@FloridaDEP.gov
Office: 850-595-0620



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