



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

August 12, 2022

Mr. Raghu Chatrathi  
CSX Transportation, Inc.  
500 Water Street, J-275  
Jacksonville, FL 32202  
[raghu\\_chatrathi@CSX.com](mailto:raghu_chatrathi@CSX.com)

**Re: CSX Transportation, Inc.**  
**EPA/DEP ID: FLD006921340**  
**Duval County – Hazardous Waste**

Dear Mr. Chatrathi:

Department personnel conducted a compliance inspection of the above-referenced facility on April 13, 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 compliance efforts. Should you have any questions or comments, please contact Cheryl Mitchell at (904) 256-1620 or via e-mail at [cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

cc: Kim Vaughn, CSX Transportation ([Kim\\_Vaughn@CSX.com](mailto:Kim_Vaughn@CSX.com)), Mark Mullis, CSX Transportation ([Mark\\_Mullis@csx.com](mailto:Mark_Mullis@csx.com)); Jean Richards, City of Jacksonville EPD ([JeanR@coj.net](mailto:JeanR@coj.net))  
DEP internal: Joni Petry, Bonnie Bradshaw, Cheryl L. Mitchell



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

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**FACILITY INFORMATION:**

**Facility Name:** CSX Transportation Inc  
**On-Site Inspection Start Date:** 04/13/2022 **On-Site Inspection End Date:** 04/13/2022  
**ME ID#:** 52332 **EPA ID#:** FLD006921340  
**Facility Street Address:** 500 Water St J-275 , Jacksonville, Florida 32202-4423  
**Contact Mailing Address:** 500 Water Street, J-275, Jacksonville, Florida 32202  
**County Name:** Duval **Contact Phone:** (904) 366-4174

**NOTIFIED AS:**

Transporter, Used Oil, VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG **Transporter:** Commercial Waste **Used Oil:** Transporter, Used Oil **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Mercury Containing Lamps **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 Hazardous Waste Transporter Facility  
Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for VSQG (<100 kg/month) Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector  
**Other Participants:** Kimberly Vaughn, Manager Environmental Programs

**LATITUDE / LONGITUDE:** Lat 30° 19' 28.143" / Long 81° 39' 50.6761"

**NAIC:** 482111 - Line-Haul Railroads

**TYPE OF OWNERSHIP:** Private

**Introduction:**

CSX Transportation (CSXT, the facility) was inspected on April 13, 2022. CSXT submitted its notification to the Department as a Hazardous Waste Transporter, Used Oil Transporter, and a Very Small Quantity Generator (VSQG) of hazardous waste in April 2022. CSXT was last inspected by the Department's Hazardous Waste Program on May 3, 2018. CSXT representatives present during the inbrief and overview of CSXT operations included Raghu Chatrathi, Sam Ross, Chris Machenberg, Kim Vaughn, Mark Mullis, Brian Zacker, Todd Hagen. Mr. Zacker and Mr. Hagen participated during the inspection of the building areas, described below. Ms. Vaughn and Mr. Mullis participated during the records review.

CSXT is a wholly-owned subsidiary of CSX Corporation. CSXT serves the eastern U.S. and maintains a 21,000-mile railroad network. CSXT currently operates 2,400 locomotives that transport a wide variety of commodities. This facility is the headquarters for CSXT and contains mostly offices. The facility is connected to city sewer and water and has been at this location since the 1960s. The areas inspected are described below.

**Process Description:**

**MAINTENANCE AND STORAGE AREA**

Minor maintenance, parts storage, and other building support activities are located in the basement of this office building. Minor equipment maintenance is performed by CSXT technicians. Large projects and major maintenance are performed by outside contractors under individual contracts.

## CSX Transportation Inc Inspection Report

Inspection Date: 04/13/2022

Universal waste lamps are collected in boxes in a designated location in the basement. At the time of the inspection, there was one box of spent lamps accumulating. The container was closed, properly labeled and dated.

### Shipping Area

Universal waste batteries are accumulated in a poly container located inside the shipping area adjacent to the basement area. At the time of the inspection there were rechargeable and alkaline batteries accumulating. The container was closed, properly labeled and dated.

### Outside Shipping Area

In a mechanical room outside the shipping area is a drum-top aerosol can puncture system that is attached to the top of a 55-gallon drum. The liquid that accumulates in the drum is managed as hazardous waste and the empty cans are recycled as scrap metal. The drum was closed and properly labeled, and the area had all the required equipment.

## HAZARDOUS WASTE TRANSPORTATION

CSXT provides hazardous waste transporter services via rail. CSXT primarily transports hazardous waste in railcars for two customers: Clean Harbors (FLD980729610) and CMC Steel US (fka Gerdau Ameristeel) (FLD083812537).

## USED OIL TRANSPORTATION

CSXT collects used oil from maintenance of CSXT-owned equipment in its own fleet of trucks. The used oil is delivered to one of three CSXT bulk oil storage facilities in the state depending upon the maintenance location. Those facilities are located in Jacksonville, Lakeland, and Tampa. Used oil at those facilities is managed by one of several used oil transporters depending upon a rotating service contract. Typically, Noble Oil Services (NCD986172476), Synergy Recycling (GAR000048009), Universal Environmental Services (GAR000020131), and Safety-Kleen (TXR000081205) manage CSXT's used oil from the bulk storage facilities described above.

CSXT also provides used oil transporter services via rail for customers as either an initial or intermediate transporter. Florida regulations in 62-710.201(5), FAC, define a Used Oil Transporter as "any person who transports used oil over public highways." Even though CSXT transports customer-generated used oil via rail, CSXT complies with Florida's notification, registration and insurance requirements for used oil transporters.

## RECORDS REVIEW

CSXT is currently operating as a Hazardous Waste Transporter, Used Oil Transporter and a Very Small Quantity Generator of hazardous waste. The facility has not had any hazardous waste shipments in the previous three years. Records reviewed included hazardous waste and used oil transporter electronic records, manifests, transporter registration, insurance certification, training program and personnel training. All records reviewed appeared to be in order.

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Copies of Northeast District's Hazardous Waste Generator Workshop PowerPoint training documents and other workshop files that may be useful can be found here:

<ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/SQG%20WORKSHOP/> and  
<ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/TRA%20WORKSHOP/>

Please note that you cannot access this site using Chrome so you will have to use another browser such as Edge, Firefox, Internet Explorer, etc.

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Inspection Date: 04/13/2022

**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			✓

Inspection Date: 04/13/2022

**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

Cheryl L Mitchell	Inspector	
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>	
	DEP	07/20/2022
<b>Principal Investigator Signature</b>	<b>Organization</b>	<b>Date</b>
Kimberly Vaughn	Manager Environmental Programs	
<b>Representative Name</b>	<b>Representative Title</b>	
	CSX Transportation	
	<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>	Cheryl L Mitchell	<b>Inspection Approval Date:</b>	07/20/2022
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