



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:**  Routine  Complaint  Follow-Up  Permitting

**FACILITY NAME:** McKenzie Tank Lines (St. Marks Terminal) **DEP/EPA ID #:** FL0000347815

**STREET ADDRESS:** 535 Port Leon Drive, St. Marks, Florida 32355

**COUNTY:** Wakulla      **PHONE:** (850)925-6309      **DATE:** 02/28/2007      **TIME:** 9:00 A.M.

HW facility status

- non-handler
- CESQG
- SQG
- LQG
  
- transporter
- transfer facility
  
- TSD
  
- SQH
- LQH

used oil facility status

- generator
- transporter
- transfer facility
- marketer
- processor
- on-spec. burner
- off-spec. burner
  
- filter generator
- filter transporter
- filter transfer facility
- filter processor

Hg facility status

- exempt
- generator
  
- transporter
  
- Hg recovery facility
- Hg reclamation facility

PCW facility status

- producer
- transporter
- recovery facility

2. **APPLICABLE REGULATIONS:**

- |  |  |   |   |
|--|--|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261 | <input type="checkbox"/> 40 CFR 262            | <input type="checkbox"/> 40 CFR 263             | <input type="checkbox"/> 40 CFR 264             |
| <input type="checkbox"/> 40 CFR 265            | <input type="checkbox"/> 40 CFR 266            | <input type="checkbox"/> 40 CFR 268             | <input type="checkbox"/> 40 CFR 270             |
| <input type="checkbox"/> 40 CFR 273            | <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL:** Mr. Leonard Arnold, Terminal Manager

4. **INSPECTION PARTICIPANTS:** Leonard Arnold (Terminal Manager), Alan Annicella - EPA, Terry Wells (FDEP)

5. **LATITUDE/LONGITUDE:** Lat 30° 10' 8.23"/Long 84° 12' 26.445"

6. **TYPE OF OWNERSHIP:** private

7. **PERMIT No.:** N/A      **DATE ISSUED:**      **EXP. DATE:**

8. Site History and Description:

McKenzie Tank Lines (MTL) is located at 535 Port Leon Drive, St. Marks, Florida, Wakulla County. MTL was last inspected on October 30, 2001 as a Conditionally Exempt Small Quantity Generator with no violations cited.

9. Site Inspections:

On February 28, 2007, McKenzie Tank Lines, St. Marks Terminal (MTS) was inspected by Alan Annicella, Environmental Protection Agency (EPA) and Terry Wells; Florida Department of Environmental Protection (FDEP). This inspection was conducted to ensure compliance with the Resource Conservation and Recovery Act (RCRA) and the Used Oil program. This terminal is managed by Mr. Leonard Arnold. Mr. Arnold answered questions and facilitated the inspection.

This facility consists of four work bays, one washing facility and a large parking/storage area. Located behind this facility were two 12,000 gallon diesel tanks that are utilized for MTL's refueling purposes. These tanks are located in secondary containment.

**The inspection of MTL's work bays and washing area revealed the following.**

- a) One Black Beauty Heater/Furnace, hard-piped to a 205-gallon used oil tank.
- b) Five 55-gallon used oil drums (Not labeled with the words Used Oil).
- c) Three 30-gallon used oil drums (Not labeled with the words Used Oil).
- d) Two 30-gallon drums containing used oil filters (Not labeled with the words Used Oil Filters).
- e) Two cardboard boxes containing used oil filters (Not labeled with the words Used Oil Filters).
- f) Two 5-gallon buckets of used oil filters (Not labeled with the words Used Oil Filters)
- g) One 5-gallon bucket containing used oil (Not labeled with the words Used Oil).
- h) One 55-gallon drum of used oil contaminated media.
- i) One 55-gallon drum of municipal trash with one antifreeze filter located inside.
- j) One parts washer that is serviced by MTL.
- k) One 880-gallon above ground tank that is used for "Oil" product.
- l) Pallet of waste batteries (Waste batteries are picked up by Southeast, Inc 904-378-7747)

Repair Bays

MTL performs routine preventative maintenance on its fleet of trucks. This four bay repair facility is surrounded by asphalt parking lot and washing facility. Located

throughout the facility were several containers that were not labeled with the words "Used Oil" or "Used Oil Filters". Located in the repair facility was one Black Beauty Heater/Furnace that burns most used oils generated onsite. During this inspection we found this tank to be partially full. Also located in this shop were two 55-gallon drums that were filled with used oil. These drums were not labeled. In addition to the used oil drums we identified one parts washer that Mr. Arnold stated as not being used frequently and as being serviced onsite.



#### Wash Rack Area:

This area is where McKenzie truck/trailers are washed before preventive maintenance occurs. The drains are designed to flow to a collection sump and oil water separator. According to Mr. Arnold the sump is serviced by skimming the oil off the top of the water, then the water is collected in an onsite treatment tank, the pH is adjusted and sent to the Tallahassee Treatment Facility. According to Mr. Arnold the PCW and sludge's are collected and sent for disposal.

Also located in this area were drums of used oil, used oil filters, oil absorbent mixture and trash. The used oil and used oil filter drums were not labeled. Also located in the trash can was one antifreeze filter that was removed, from the trash drum, during this inspection and put in the used oil filter drum.



Before leaving the facility we asked Mr. Arnold to review any disposal receipts with regards to his used oil, separator sludge, or used oil filters. Mr. Arnold indicated that it had been a while since disposal occurred and the majority of the records are kept at the McKenzie Appleyard Facility.

10. Summary of Alleged Violations:

**a) 62.710.401(6) F.A.C. General Reqmts for the Storage of Used Oil (28.1)**

*"62-710.401(6) - No person may store used oil in above-ground containers unless such containers are clearly labeled with the words "used oil" and are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. If such containers are not stored inside a structure, they must be covered or otherwise protected from the weather. If they are not double-walled tanks, they must be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment."*

MTL failed to label and close several of its used oil drums with the words "Used Oil" and several of the drums located adjacent to the washing facility were open and not labeled.

**b) 62-710.850(5)(a) F.A.C. General Reqmts for the Storage of Used Oil Filters (26.2)**

*"62-710.850(5)(a) - All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface."*


MTL's waste used oil filter drums were not labeled or closed. These drums were located inside the repair bay and washing facility.

11. Recommendations:

- a) MTL needs to store and dispose of used oil and used oil filters in accordance with State and Federal Regulations.
- b) MTL needs to keep containers of used oil and used oil filters closed when not actively adding or removing waste. Containers storing waste should be in good condition so as to prevent a release to the environment.
- c) MTL needs to maintain records of used oil and used oil filters disposal for at least 3 years.

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- d) MTL representatives need to become knowledgeable with the Title 40 Code of Federal Regulations, Part 260 through 268, Part 273 and 279, and Florida Administrative Code 62-730 and 62-710. It is MTL's responsibility to comply with all federal, state and local rules and regulations.

Report prepared by:   
Terry Wells

Date: March 12, 2007