



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Freehold Cartage Inc

On-Site Inspection Start Date: 09/03/2008 On-Site Inspection End Date: 09/03/2008

ME ID#: 16638 EPA ID#: FLD984187831

Facility Street Address: 175 Bartow Municipal Arprt, Bartow, Florida 33830-9576

Contact Mailing Address: 175 Bartow Municipal Airport, Bartow, Florida 33830

County Name: Polk Contact Phone: (863) 533-4599

NOTIFIED AS:

Transporter

Used Oil

CURRENT STATUS:

Transporter

Transfer Facility

Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D Camp, Environmental Specialist II

Other Participants: Michael Hirst, Operations Supervisor

LATITUDE / LONGITUDE: Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

SIC CODE: 4213 - Trans. & utilities - trucking, except local

TYPE OF OWNERSHIP: Municipal

Introduction:

Freehold Cartage, Inc. was inspected on September 3, 2008 to evaluate the facility's compliance with state and federal hazardous waste regulations. Mr. Michael Hirst accompanied the inspector throughout the inspection. The Department last inspected Freehold in April 2007.

Process Description:

Freehold Cartage, Inc. is a registered Hazardous Waste Transporter/Transfer Facility as well as a Used Oil/Used Oil Filter Transporter/Transfer Facility and a Universal Waste Transporter/Transfer Facility. Operations have not changed significantly since the Department's last inspection. Freehold does not transport used oil often and pick ups are only arranged through brokers. Presently, Freehold screens all drums of used oil they transport with Chlor-Detect kits. Hazardous waste containers are stored up to 10 days in a storage trailer that is not utilized for transport that is located at the loading dock. At the time of the inspection, the facility had numerous containers within this storage trailer. The facility's paperwork, including training records, closure plan, transfer log and manifests appeared to be in order at the time of the inspection.

Hazardous waste storage trailer:

Hazardous waste storage trailer.

Pending Potential Violations and Areas of Concern:

Transporters Checklist

Type: Violation

Inspection Date: 09/03/2008

Rule: 265.171

Question Number: 1.14.1

Explanation: One severely rusted drum of hazardous waste containing toluene and diisocyanate was found to be leaking at the time of the inspection. (corrected)

Corrective Action: Facility personnel placed the leaking drum into an overpack drum during the inspection.

Trailer loaded for transport:

Trailer adjacent to hazardous waste storage trailer.

Pending Potential Violations and Areas of Concern:**Transporters Checklist**

Type: Area Of Concern

Rule: 265.171

Question Number: 1.14.1

Explanation: An undetermined discharge was found in one of the trailers loaded for transport. The leak was located adjacent to a pallet of universal waste lead acid batteries. It did not appear that a battery was leaking. Another smaller discharge which appeared to be the same substance was located further in the trailer.

Corrective Action: Facility personnel applied clay absorbent material over the discharge areas during the inspection.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 265.171	Hazardous waste storage trailer	09/03/2008	One severely rusted drum of hazardous waste containing toluene and diisocyanate was found to be leaking at the time of the inspection. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 265.171	Trailer loaded for transport.	09/03/2008	An undetermined discharge was found in one of the trailers loaded for transport. The leak was located adjacent to a pallet of universal waste lead acid batteries. It did not appear that a battery was leaking. Another smaller discharge which appeared to be the same substance was located further in the trailer.

Freehold Cartage Inc Inspection Report

Inspection Date: 09/03/2008

Page 3 of 4

Conclusion:

Freehold Cartage was determined to have one container violation at the time of the inspection which was corrected during the inspection.

Inspection Date: 09/03/2008

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Shannon D Camp
PRINCIPAL INSPECTOR NAME

Environmental Specialist II
PRINCIPAL INSPECTOR TITLE


PRINCIPAL INSPECTOR SIGNATURE

FDEP - SWD
ORGANIZATION

9/26/2008
DATE

Michael Hirst
REPRESENTATIVE NAME

Operations Supervisor
REPRESENTATIVE TITLE

NO SIGNATURE
REPRESENTATIVE SIGNATURE

Freehold Cartage, Inc.
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 "Not Ok" or areas of concern.



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION CHECK LIST

Transporters Checklist

Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Transporter Requirements (40 CFR 263) Completed		Ok	Not Ok	Unk	N/A
1.1	Do vehicles transporting hazardous waste have the appropriate placards?	✓			
1.2	Does transporter have an EPA identification number?	✓			
1.3	Does the transporter use manifest system as required by 263.207?	✓			
1.3.1	Do the manifests contain at least: <input type="checkbox"/> Name, address, and EPA ID of transporter? <input type="checkbox"/> Name, address, and EPA ID code of generator? <input type="checkbox"/> Name, address, identification code of designated permitted facility? <input type="checkbox"/> Corresponding manifest document number? <input type="checkbox"/> Description and quantity of each hazardous waste? <input type="checkbox"/> Signature of subsequent transporters? <input type="checkbox"/> Signatures signifying proper delivery or reasons why delivery could not be certified? <input type="checkbox"/> EPA waste codes?	✓			
1.4	International shipments:				
1.4.1	Record of date waste left U.S.?				✓
1.4.2	Presence of one signed copy in records?				✓
1.4.3	Signed copy of manifest returned to the generator?				✓
1.4.4	Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?				✓
1.5	For SQG waste:				
1.5.1	Is waste transported according to reclamation agreement?				✓
1.5.2	Is following information recorded on a shipping paper: <input type="checkbox"/> Name, address, and EPA ID of waste generator. <input type="checkbox"/> Quantity of waste accepted. <input type="checkbox"/> DOT - required shipping info. <input type="checkbox"/> Date waste is accepted	✓			
1.5.3	Does transporter carry this shipping paper during transport?	✓			
1.5.4	Are records maintained for three years after termination or expiration of reclamation agreement?				✓
1.6	Are copies of the manifest retained for 3 years?	✓			
1.7	Is there evidence of discharge of hazardous waste?	✓			
1.8	Has transporter demonstrated the financial responsibility required under 62-730.170(2)	✓			
1.9	Does the transporter verify financial responsibility with the Department annually?	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Transfer Facility Requirements (62-730.171) Completed		OK	Not Ok	Unk	N/A
1.10	Does transporter comply with 10 day storage limit for transfer facilities?	✓			
1.10.1	Is the hazardous waste packaged according to 262.30?	✓			
1.11	General Facility Standards (265 Subpart B)				
1.11.1	Security				
1.11.1.1	Is the facility security system adequate to minimize unauthorized entry?	✓			
1.11.1.2	Are signs posted and legible for 25 feet?	✓			
1.11.2	Inspection Requirement				
1.11.2.1	Does the facility have a copy of the Inspection Plan?	✓			
1.11.2.2	Does the facility have completed inspection logs?	✓			
1.11.2.3	Were the deficiencies corrected in a timely manner?	✓			
1.11.2.4	Are the inspection logs maintained at the facility for 3 years?	✓			
1.11.3	Personnel Training				
1.11.3.1	Do management personnel complete hazardous waste training? <input checked="" type="checkbox"/> Is training on the job? <input type="checkbox"/> Is training in the classroom?	✓			
1.11.3.3	Do laborers who handle hazardous waste complete training? <input checked="" type="checkbox"/> Is training on the job? <input type="checkbox"/> Is training in the classroom?	✓			
1.11.3.6	Does training include emergency response procedures, inspection procedures, and operation of hazardous waste handling equipment?	✓			
1.11.3.7	How often is training reviewed? Annually				
1.11.3.9	Does the facility have personnel training records including job title, description of position, and description of employee's training?	✓			
1.11.3.10	Is training successfully completed within 6 months of hiring/transfer to HW position?	✓			
1.11.3.11	Are records maintained for three years at the facility?	✓			
1.11.4	Ignitable, Reactive, or Incompatible Waste				
1.11.4.1	Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat?	✓			
1.11.4.2	Are "No Smoking" signs posted in the area?	✓			
1.12	Preparedness and Prevention (265 Subpart C)				
1.12.1	Is there evidence of fire, explosion or contamination of the environment?	✓			
1.12.2	Is the facility equipped with (265.32 - required equipment):	✓			
1.12.2.1	Internal communications or alarm system? Is it easily accessible in case of emergency?	✓			
1.12.2.2	Telephone or two-way radio to call emergency response personnel?	✓			
1.12.2.3	Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? <input type="checkbox"/> Is this equipment tested to assure its proper operation?	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Transfer Facility Requirements (62-730.171) Completed		Ok	Not Ok	Unk	N/A
1.12.2.3	How many times per year? 1	✓			
1.12.3	Water of adequate volume for hoses, sprinklers or water spray system? Describe source of water. Indicate flow rate and/or pressure and storage capacity, if applicable.				✓
1.12.4	Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.)	✓			
1.12.4.1	Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)	✓			
1.12.5	In the case that more than one police or fire department might respond, is there a designated primary authority? If yes, indicate primary authority Is the fire department a city or volunteer fire	✓			
1.12.6	Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? <input type="checkbox"/> Are they readily available to the emergency coordinator?	✓			
1.12.7	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? <input type="checkbox"/> If no, has the owner/operator attempted to do this?	✓			
1.12.8	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record?				✓
1.13	Contingency Plan and Emergency Procedures (265 Subpart D)				
1.13.1	Does the facility have a contingency plan?	✓			
1.13.2	Is it at the facility and easily available?	✓			
1.13.3	Is the contingency plan a revised SPCC Plan	✓			
1.13.3.1	Does the plan include: <input type="checkbox"/> Action personnel will take? <input type="checkbox"/> Evacuation routes? <input type="checkbox"/> Emergency Equipment?	✓			
1.13.3.5	Is the emergency equipment properly inspected and maintained?	✓			
1.13.4	Is there an emergency coordinator on site or within short driving distance of the plant at all times?	✓			
1.13.5	Who is the emergency coordinator? Michael Hirst				
1.13.6	Has the facility supplied local police and fire departments with a copy of the contingency plan?	✓			
1.13.7	Has the facility supplied DEP with a copy of the Contingency Plan?	✓			
1.14	Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)				
1.14.1	Are the containers in good condition? (check for leaks, corrosion, bulges, etc.)		✓		
1.14.2	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	✓			
1.14.3	Is the waste compatible with the containers and/or its liner?	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Transfer Facility Requirements: (62-730.171) Completed		Ok	Not Ok	Unk	N/A
1.14.4	Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?	✓			
1.14.5	Are each of the containers inspected at least weekly?	✓			
1.14.6	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line?	✓			
1.14.7	Are incompatible wastes stored in the same containers?	✓			
1.14.8	Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?	✓			
1.15	Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? <input type="checkbox"/> Has the facility supplied DEP with a copy of the plan?	✓			
1.16	Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground?	✓			
1.17	Is a written log maintained for all waste entering or leaving the transfer facility?	✓			
1.17.1	Does the log contain: <input type="checkbox"/> Generators' names? <input type="checkbox"/> Manifest numbers? <input type="checkbox"/> Dates when waste enters and leaves facility?	✓			
1.18	Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)?	✓			
1.19	Does the transfer facility have an EPA/DER ID number?	✓			

Unregulated Wastes (Household/Conditionally Exempt/Small Quantity Generator Wastes) Completed		Ok	Not Ok	Unk	N/A
1.20	Does the transporter have documentation that this waste was generated by an unregulated source? If yes, complete the applicable Generator or Small Quantity Generator checklist. <input type="checkbox"/> If no, is the transporter assuming responsibility as the generator of this waste?				✓
1.21.2	If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows: <input type="checkbox"/> 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed <input type="checkbox"/> 180 days after initial inspection if the quantity of "unregulated" wastes on site are less				
1.22	Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)? If yes, complete the Generator checklist.				✓

Land Disposal Restrictions Completed		Ok	Not Ok	Unk	N/A
1.23	Does the transporter manage restricted (land ban) wastes? If yes, check appropriate box(es). <input type="checkbox"/> "California List" <input type="checkbox"/> F--- List Solvents <input type="checkbox"/> First Third <input type="checkbox"/> Second Third <input type="checkbox"/> Third Third <input type="checkbox"/> Soil and Debris	✓			



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST

Land Disposal Restrictions Completed	Ok	Not Ok	Unk	N/A
1.23	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Pre-Inspection Checklist

Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Pre-Inspection Review Completed:		Ok	Not Ok	Unk	N/A
26.1	Facility failed to notify with the correct status.	✓			
26.2	Facility failed to notify change of status.	✓			
26.3	Did the facility conduct a waste determination on all wastes generated?	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Used Oil Transporter

Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

40 CFR279 Subpart E --Transporter Standards Completed		Ok	Not Ok	Unk	N/A
29.1	Is the facility exempt under any of the following? On site transport? Generator transporting < 55 g /time to a collection center? Transporter of < 55 g /time from generator to aggregation point owned by same				✓
29.2	If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous).				✓
29.3	Does the transporter process used oil beyond what would be considered incidental to transport?				✓
29.3.1	If 'yes' are they in compliance with 279 Subpart F?				✓
29.4	Has the facility notified of used oil activities? Check EPA form 8700-12.	✓			
29.5	Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID numbers?	✓			
29.6	Does the transporter comply with DOT requirements?	✓			
29.7	If any oil is discharged during transport, does the transporter:				
29.7.1	Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?				✓
29.7.2	Report to DOT in writing per 49 CFR 171.16?	✓			
29.7.3	Clean up any discharges until the discharge poses no threat?	✓			
29.8	Does the facility also transport used oil filters?	✓			
29.8.1	If so, are the filters stored in above ground containers which are:				
29.8.1.1	In good condition?	✓			
29.8.1.2	Closed or otherwise protected from weather?	✓			
29.8.1.3	Labeled "Used Oil Filters"?	✓			
29.8.1.4	Stored on an oil impervious surface?	✓			

Transporter Recordkeeping -279.46 Completed		Ok	Not Ok	Unk	N/A
29.9	Do used oil acceptance records include:				
29.9.1	Name & Address of facility providing the oil for transport?	✓			
29.9.2	EPA ID # of oil provider?	✓			
29.9.3	Quantity of oil shipped?	✓			
29.9.4	Date of acceptance?	✓			
29.9.5	Signature of oil provider, dated upon receipt?	✓			



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Transporter Recordkeeping -279.46 Completed		Ok	Not Ok	Unk	N/A
29.9.5		✓			
29.10	Do used oil delivery records include:				
29.10.1	Name & Address of receiving facility or transporter?	✓			
29.10.2	EPA ID # of receiving facility or transporter?	✓			
29.10.3	Quantity of oil delivered?	✓			
29.10.4	Date of delivery?	✓			
29.10.5	Signature of oil receiver, dated upon receipt?	✓			
29.11	Do the above records also include:				
29.11.1	State required information on the type of oil?	✓			
29.11.2	Destination or end use?	✓			
29.12	Does the facility keep records on DEP Form 62-710.901(2) or equivalent?	✓			
29.13	Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year?	✓			
29.13.1	If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements?				✓
29.14	Does the transporter keep copies of the record and reports for three years at the street address of the facility?	✓			

Transporter Certification (62-710 F.A.C.) Completed		Ok	Not Ok	Unk	N/A
29.15	Is the transporter certified? (local governments, and < 55g/time transporters are exempt)	✓			
29.16	Does the facility maintain training records?	✓			
29.17	Does the facility maintain insurance or financial assurance of \$100,000 combined single limit?	✓			
29.18	Is the facility registration form and ID number displayed?	✓			

Transfer Facility Standards -279.45 Completed		Ok	Not Ok	Unk	N/A
29.19	Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F.	✓			
29.19.1	Is the transfer facility registered per 62-710.500(1)(a) F.A.C?	✓			
29.20	Does the transporter determine whether used oil stored at a transfer facility has total halogen content above or below 1,000 ppm?	✓			
29.20.1	Is this done by testing?	✓			
29.20.2	Is this done by process knowledge? Describe basis Testing by Chlor-Detect.	✓			
29.20.3	Are test records or copies of records providing basis for determination kept for 3 years?	✓			
29.21	Have any analyses showed Exceedence of the 1,000 ppm level?				✓
29.21.1	If so, was the oil managed as hazardous waste?				✓



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE INSPECTION CHECK LIST**

Transfer Facility Standards -279.45 Completed		Ok	Not Ok	Unk	N/A
29.21.1					✓
29.21.2	If not, was the oil exempt? Describe Do not pick up used oil with halogen levels of 1000 ppm or more.				✓
29.22	Is used oil stored only in tanks or containers, or units subject to 264 and 265?	✓			
29.23	If the facility has tanks, do they comply with 62-761 and 62.762 rules?				✓
29.23.1	Describe, including number and size of tanks, noting registration numbers if applicable, and compliance status. n/a				
29.23.2	Is secondary containment provided and adequate?	✓			
29.24	Are containers and tank trailers in good condition and not leaking?	✓			
29.25	Are containers provided with secondary containment with minimum requirements?	✓			
29.25.1	Is the containment system impervious to oil so as to prevent migration?	✓			
29.26	Are ASTs, UST tank fill lines and containers labeled "used oil"?				✓
29.27	Are used oil filters generated off-site stored more than 10 days?	✓			
29.27.1	If so, is the facility a registered used oil filter transfer facility?	✓			
29.28	Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?	✓			