



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Aqua Clean Environmental Company Inc

On-Site Inspection Start Date: 11/18/2008

On-Site Inspection End Date: 11/18/2008

ME ID#: 21896

EPA ID#: FLR000034033

Facility Street Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

Contact Mailing Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

County Name: Polk

Contact Phone: (941) 644-0665

NOTIFIED AS:

Non-Handler

Used Oil

CURRENT STATUS:

Used Oil Transfer Facility

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Beth Knauss, Environmental Manager

Other Participants: W.D. Miller, Manager; James Dregne, Environmental Manager

LATITUDE / LONGITUDE: Lat 28° 0' 18.6604" / Long 82° 2' 33.4423"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Aqua Clean Environmental Company, Inc. was inspected November 18, 2008 to determine the facility's compliance with state and federal used oil and petroleum contact water management regulations. Mr. W.D. Miller represented the facility throughout the inspection. The facility continues to manage various oily waste waters in its permitted centralized waste water treatment unit (CWT). Waste water is discharged to the City of Lakeland sewer system. Petroleum recovered in the unit's oil/water separator is transferred to a used oil processor for further water removal and fuel blending. Sludges are solidified with sawdust and disposed of as non-regulated solid waste.

Process Description:

Sludges continue to be analyzed by the TCLP method for metals and volatile organic compounds once per month by an off site certified laboratory. All results since the previous inspection show the material to be non-regulated, although a couple of analyses show detections for metals, benzene and solvent constituents. The chain of custody and sample check in sheets are retained and attached to the analytical results and indicate that the samples were collected in compliance with FAC Rule 62-160. Since the previous inspection, Aqua Clean has added the ability to screen samples for glycols in addition to pH and percent solids. A Hach spectrophotometer and test kits are used and no analytical records are kept. As the test is used for internal screening, Department QA program SOPs are not applicable. Aqua Clean is no longer allowing wastes with high ethylene glycol to discharge directly to the collection sump. Instead, these wastes are treated by discharging them onto the solidification pad.

Liquids that drain through the wood chips on the solidification pad collect in the sump at the headworks of the treatment unit. The secondary containment around the waste water treatment unit held some oily water and it was recommended that this material be drained to the headworks as soon as possible. The source of the contamination was not clear. No leaks were observed and the release may have been from a disconnected or leaking transfer hose. The containment system

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capacity met used oil program requirements even with the standing water. Tanks #8 and #9 were labeled "used oil." The recovered oil still has a relatively high water content and is sent to off site used oil processors for further water removal. Aqua Clean does not intend to engage in fuel processing or marketing at any foreseeable time in the future. Recovered oil is reported on the facility's annual used oil and petroleum contact water reports.

Aqua Clean continues to rely upon certifications provided by the generator that the wastes they accept are not regulated hazardous waste. The waste profiles are often incomplete and do not include analytical information or information on the process generating the waste. The Department recommends that analytical information be obtained and reviewed prior to acceptance, as there have been several incidents recently where regulated hazardous wastes were shipped to the facility and accepted for treatment based on inaccurate profiles. In February 2008 Aqua Clean accepted a load of glycerin bottoms and storm water from Agri Source Fuels without a flash point analysis. Pure glycerin is not ignitable, however glycerin bottoms from biodiesel production contain enough methanol to be ignitable hazardous wastes when shipped for disposal. As Aqua Clean did not require a flash point analysis, Agri Source shipped the material as non-regulated. Better waste screening will help prevent pass through interference and ensure compliance with the facility's pretreatment permit.

Aqua Clean's pretreatment permit would allow acceptance of hazardous waste for pretreatment, however the facility would have to notify as a "designated facility" and comply with the manifest system for any hazardous waste that is knowingly received.

POTENTIAL VIOLATIONS AND AREAS OF CONCERN WITH NO ASSIGNED AREA:

Pre-existing Potential Violations and Areas of Concern:

Pre-Inspection Checklist

Type:	Area Of Concern
Rule:	262.12
Question Number:	26.1
Explanation:	Aqua Clean has made the business decision not to accept manifested hazardous wastewater for pretreatment. However, the Department has documented several occasions after the facts where unmanifested hazardous waste has been accepted by Aqua Clean on the basis of inaccurate or incomplete profiles.
Corrective Action:	Aqua Clean should improve its waste profiling and review procedures to ensure that hazardous waste is rejected in the future.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Pre-Inspection Checklist			
262.12		11/18/2008	Aqua Clean has made the business decision not to accept manifested hazardous wastewater for pretreatment. However, the Department has documented several occasions after the facts where unmanifested hazardous waste has been accepted by Aqua Clean on the basis of inaccurate or incomplete

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Rule Number	Area	Date Cited	Explanation
			profiles.

Conclusion:

Aqua Clean is currently in compliance with used oil transporter and transfer facility requirements that apply to facilities accepting petroleum contact water for recovery.

History:

Activity Closed Date: 01/20/2009

Inspection Date: 11/18/2008

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.

Beth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

1/20/2009

DATE

James Dregne

INSPECTOR NAME

Environmental Manager

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP SWD

ORGANIZATION

W.D. Miller

REPRESENTATIVE NAME

Manager

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATUREAqua Clean Environmental Company,
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.