



Florida Department of Environmental Protection

Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

File 11/21

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

NOV 21 2008

Mr. Bart Snow, President
Sun Coast Environmental, Inc.
405 Mealy Drive
Atlantic Beach, Florida 32233

Re: Sun Coast Environmental, Inc.
EPA/DEP ID: FLR 000 064 881
Duval County - Hazardous Waste

Dear Mr. Snow:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection (DEP) at your facility on September 24, 2008. Enclosed is the report that documents this inspection.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning used oil management. Subsequent to the inspection, your facility submitted information stating that the violations have been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at 904.807.3382.

Sincerely,

Jenna Perry
Environmental Specialist II
Hazardous Waste Section

Enclosure

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Compliance

FACILITY NAME: Sun Coast Environmental, Inc.

DEP/EPA ID #: FLR 000 064 881

STREET ADDRESS: 405 Mealy Drive, Atlantic Beach, Florida 32233

MAILING ADDRESS: same as above

COUNTY: Duval PHONE: 904.241.3111 DATE: 9/24/08 TIME: 10:15 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. RESPONSIBLE OFFICIAL: Bart Snow, President

3. INSPECTION PARTICIPANTS: Bart Snow - Sun Coast Environmental, Inc.
Jenna Perry, Tami Applebee - FDEP

4. LATITUDE/LONGITUDE: N 30° 20' 21.3" / W 081° 25' 04.6"

5. TYPE OF OWNERSHIP: private

6. SIC CODE: 4212

7. GLOSSARY OF TERMS:

CFR - Code of Federal Regulations

F.A.C. - Florida Administrative Code

F.S. - Florida Statutes

PROCESS DESCRIPTION:

Sun Coast Environmental, Inc. (Sun Coast) was inspected on September 24, 2008, as an unannounced hazardous waste compliance evaluation inspection. Mr. Bart Snow, President, was present throughout the inspection.

Sun Coast is a registered used oil transporter. The facility has a contract with the US Navy to remove oily bilge water from surface ships berthed at Mayport Naval Station in Mayport, Florida. Sun Coast pumps bilge water from the ships using a pumper truck. The oily bilge water, described on shipping manifests as "oil/water emulsion," is delivered directly to Water Recovery, Inc. (WRI) by Sun Coast. WRI (FLR 000 069 062) is a registered used oil processor. The facility no longer brings any used oil/oily bilge water back to the facility before transportation. At the time of the inspection, Sun Coast Environmental, Inc. was only transporting oily bilge water for the US Navy. The facility has four employees and has been in operation at its present location since 1999.

INSPECTION:

Shop Area

The facility uses the shop area to store products and tools and to perform light maintenance work.

Fleet maintenance is performed on-site for all of the company's trucks. Used oil is drained into a small catch pan, which was not labeled (*Photo 1*). **Failure to label containers storing used oil is a violation of 40 CFR 279.22(c)(1).** Mr. Snow added a used oil label to this container during the inspection (*Photo 2*). According to Mr. Snow, used oil is disposed of by adding the used oil to the facility's rags and oil dry. The oil is then sent to EcoFlo SE, Inc. for disposal in a landfill, **which is a violation of Rule 62-710.401(3), FAC.** Also according to Mr. Snow, used oil filters are also placed in with the facility's rags for disposal through EcoFlo, **which is a violation of Rule 62-710.850(1), FAC.** After the inspection, the facility submitted documentation on 9/24/08, stating that used oil and used oil filters would no longer be mixed in with the facility's rags and oil dry but, instead, would be disposed of by recycling through a permitted facility.

Frequently, the facility will clean heat exchangers, which are scaled with calcium deposits, with hydrochloric acid (HCl). The heat exchangers are made of copper nickel and copper and are pulled from compressed air systems, oil systems, and ultra-pure demineralized water systems. According to Mr. Snow, the waste HCl is neutralized before disposal. There were two 55-gallon poly-drums of neutralized HCl on-site during the inspection. A pH paper test of one of the drums confirmed that the waste had been neutralized. The neutralized HCl is disposed of with EcoFlo.

The facility also offers a water purifying service to Mayport carriers. Sun Coast has four 2-vessel demineralizers for this purpose. To regenerate the demineralizers, the facility will flush the first vessel with HCl and the second vessel with NaOH. The two solutions then mix together, forming salt water. According to Mr. Snow, the facility has received permission from the City of Atlantic Beach to dump the waste saltwater into the sewer system.

RECORDS:

To maintain their status as a transporter of used oil, Sun Coast Environmental, Inc. annually verifies financial responsibility with the Department, pursuant to Rule 62-710.600, FAC for used oil transporters and carries liability insurance through Paul Lynch & Associates, Inc.

Sun Coast Environmental, Inc. transports used oil using a manifest system that contains the information required by 40 Code of Federal Regulations (CFR) 279.46 for used oil shipping papers. Used oil manifests are maintained on-site for a period of not less than three years. There were two manifests, dated 6/18/08 and 8/20/08, that did not have an EPA ID number for the used oil receiving facility, which in both cases was Moran Environmental (*Photos 3 and 4*). **Failure to list the EPA ID number of the receiving facility on a used oil manifest is a violation of 40 CFR 279.46(b)(2).** After the inspection, the facility submitted documentation on 9/24/08, stating that the EPA ID number has been placed on the two manifests and the receiving facility (Moran) has been notified of the change. The facility also stated that EPA ID numbers for receiving facilities would be placed on all future used oil manifests.

SUMMARY OF POTENTIAL VIOLATIONS AND CORRECTIVE ACTIONS:

1. 40 CFR 279.22(c)(1) – Used Oil Labels

VIOLATION:

The facility failed to label all containers storing used oil with the words “Used Oil.”

CORRECTIVE ACTION:

No further action is required. On 9/24/08, the facility returned to compliance.

2. 40 CFR 279.46(b)(2) – Manifest Requirements for Used Oil Transporters

VIOLATION:

The facility failed to have the EPA ID number for the used oil receiving facility on two manifests, dated 6/18/08 and 8/20/08.

CORRECTIVE ACTION:

No further action is required. On 9/24/08, the facility returned to compliance.

3. Rule 62-710.401(3), FAC - Used Oil Mixed with Solid Waste Destined for Landfill
VIOLATION:

The facility disposed of used oil with rags and oil dry which was destined for a landfill.

CORRECTIVE ACTION:

No further action is necessary. On 9/24/08, the facility returned to compliance.

4. Rule 62-710.850(1), FAC - Used Oil Filters in the Trash
VIOLATION:

The facility disposed of used oil filters with waste destined for a landfill.

CORRECTIVE ACTION:

No further action is necessary. On 9/24/08, the facility returned to compliance.

Site Inspector:

 11/13/08

Jenna Perry Date
Environmental Specialist II
Hazardous Waste Section

Site Inspector:

 11/20/08

Tami Applebee Date
Environmental Specialist I
Hazardous Waste Section

Approved by:

 11/19/08

Vicky G. Valade Date
Environmental Manager
Hazardous Waste Section

Approved by:

 11/20/08

Ashwin B. Patel Date
Hazardous Waste Supervisor
Hazardous Waste Section



Photo 1



Photo 2

HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
3. Generator's Name and Mailing Address Sun Coast Environmental, Inc. 405 Mealy Drive Atlantic Beach, FL. 32233				
4. Generator's Phone (904) 241-3111				
5. Transporter 1 Company Name Sun Coast Environmental, Inc.		6. US EPA ID Number FLR000064881	A. Transporter 904-2	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter	
9. Designated Facility Name and Site Address Moran Environmental Recovery, Inc. 251 Levy Road Atlantic Beach, FL. 32233		10. US EPA ID Number	C. Facility's 904-2	
11. Waste Shipping Name and Description a. Oil/Water Emulsion		12.		

Photo 3

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Doc. No.	2. Page 1 of 1
3. Generator's Name and Mailing Address Sun Coast Environmental, Inc. 405 Mealy Dr. Atlantic Beach, FL. 32233				
4. Generator's Phone (904) 241-3111				
5. Transporter 1 Company Name Sun Coast Environmental, Inc.		6. US EPA ID Number FLR000064881	A. Transporter (904)	
7. Transporter 2 Company Name		8. US EPA ID Number	B. Transporter	
9. Designated Facility Name and Site Address Moran Environmental Recovery, Inc. 251 Levy Rd. Atlantic Beach, FL. 32233		10. US EPA ID Number	C. Facility's (904)	
11. Waste Shipping Name and Description				

Photo 4



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION CHECK LIST

Used Oil Generator 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.

On site storage of unmixed used oil or filter shipped through certified transporters Completed		Ok	Not Ok	Unk	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units?	✓			
5.1.1	Are containers/tanks in good condition?	✓			
5.1.2	Are containers/tanks leaking?	✓			
5.1.3	Are containers/tanks storing used oil marked with the words "Used Oil"?		✓		
5.1.4	Including fill pipes used to fill underground tanks?				✓
5.1.5	Are containers/tanks (regardless of size) that are stored outside:				
5.1.5.1	Closed or otherwise protected from the environment				✓
5.1.5.2	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment				✓
5.1.6	Are containers/tanks that are stored inside:				
5.1.6.1	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment (regardless of size)? Note: Inside containers that are 55 gallons or less are assumed to meet the secondary containment requirement if they are stored on an oil-impervious surface. Inside containers/tanks that are larger than 55 gallons and are portable/wheeled are assumed to meet the secondary containment if they are stored on an oil-impervious surface and if they are typically emptied every 24 hours.	✓			
5.2	Are used oil filters stored in above ground containers which are:				
5.2.1	In good condition?				✓
5.2.2	Are used oil filters closed or otherwise protected from weather?				✓
5.2.3	Are used oil filters labeled "Used Oil Filters"?				✓
5.2.4	Are used oil filters stored on an oil impervious surface?				✓
5.3	Have any releases to the environment occurred, other than a leak from a UST?	✓			
5.3.1	If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?				✓
5.4	Does the generator only use transporters who have received EPA Identification numbers?				✓
5.4.1	Is transporter also a Florida certified used oil transporter?				✓
5.4.2	Names and numbers of transporters: N/A				
5.5	Does the facility generate other materials contaminated with used oil?	✓			
5.5.1	If so, are the materials burned for energy recovery as used oil?	✓			
5.5.2	or, Does the facility have records documenting the residuals are not hazardous waste?	✓			
5.6	Does the generator mix hazardous waste with the used oil?	✓			



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION CHECK LIST

On site storage of unmixed used oil or filter shipped through certified transporters Completed		Ok	Not Ok	Unk	N/A
5.6		✓			
5.6.1	If so, is the facility a CESQG? [CESQGs that mix HW and used oil must maintain disposal documentation per 62-730.030(3), FAC.]	✓			
5.6.2	If not, Is the oil mixed with a characteristic hazardous waste? [If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.] Describe Waste	✓			
5.6.2.1	If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste?	✓			
5.6.2.2	Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable?	✓			

Generator Self Transport Completed		Ok	Not Ok	Unk	N/A
5.7	Does facility transport used oil pursuant to the generator self transport exemption?	✓			
5.7.1	Transports only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Name and location of center: Location of generator aggregation point	✓			
5.7.2	If so, is this only in vehicles owned by the facility or facility employees?	✓			
5.7.3	Is no more than 55 gallons transported at one time?	✓			

Processor, Marketer & Burner Applicability Completed		Ok	Not Ok	Unk	N/A
5.8	Does the generator claim that the used oil meets the specification in 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]	✓			
5.9	Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]	✓			
5.10	Does the generator burn on site in a space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]	✓			
5.10.1	If so, does he burn only DIY oil or oil generated on site?	✓			
5.10.2	Does the heater have a capacity of no more than 0.5 million BTU/hr?	✓			
5.10.3	Are combustion gasses vented to the atmosphere?	✓			
5.10.4	Alternatively, does the generator have a tolling arrangement with a used oil reclaimer?	✓			
5.10.4.1	Is a copy of the contract kept on site specifying type and frequency of shipments?	✓			
5.10.4.2	That the transport vehicle is owned by the processor?	✓			
5.10.4.3	That the reclaimed oil will be returned to the generator?	✓			



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				✓
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?				✓
29.21.2	If not, was the oil exempt?				✓



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

Transfer Facility Standards -279.45 Completed		Ok	Not Ok	Unk	N/A
29.21.2	Describe				✓
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?				✓