



Jeb Bush
Governor

File 6/29

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Colleen M. Castille
Secretary

June 29, 2006

Mr. Mark Owens
Water Recovery, Inc.
1819 Albert Street
Jacksonville, Florida 32202

Re: **Water Recovery, Inc.**
DEP/EPA ID FLR 000 069 062
Duval County – Used Oil Processor

Dear Mr. Owens:

Thank you for your assistance during the hazardous waste compliance evaluation inspection conducted by the Department at your facility on May 5, 2006.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulations in general, please call me at 904.807.3370.

Sincerely,

Christopher Bodin, Engineer
Hazardous Waste

VC/
CB/cb/ddb

Enclosure

"More Protection, Less Process"

Printed on recycled paper.

DOCKET# C.06.1



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Compliance Evaluation ☐ Complaint ☐ Follow-up ☐ Permitting

FACILITY NAME: Water Recovery, Inc.

DEP/EPA ID #: FLR 000 069 062

STREET ADDRESS: 1819 Albert Street, Jacksonville, Florida 32202

MAILING ADDRESS: same as above

COUNTY: Duval **PHONE:** (904) 475-9320 **DATE:** 5/5/06 **TIME:** 11:00 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 type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input checked="" type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" 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"/> 62-740, FAC |

3. **RESPONSIBLE OFFICIAL:** Mr. Mark Owens, Plant Manager

4. **INSPECTION PARTICIPANTS:** Mr. Mark Owens, WRI

Christopher Bodin, FDEP

5. **LATITUDE/LONGITUDE:** 30°19'36" / 81°37'53"

6. **TYPE OF OWNERSHIP:** private federal state county municipal

7. **PERMIT #:** 79677-006-HO **ISSUE DATE:** 5/25/06 **EXP. DATE:** 10/11/10

"More Protection, Less Process"

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Process Description:

Water Recovery, Inc. (WRI) is a used oil generator, a used oil and used oil filter transporter, a used oil processor and a used oil filter transfer facility (Permit # 79677-006-HO). WRI is also an industrial wastewater pre-treatment facility. The facility consists of a main office, a laboratory, a maintenance shed, a container storage area, a used oil processing area, a wastewater processing area, and a solids/sludge/ residues management area. This inspection was unannounced.

WRI leases the property upon which it operates from DLAC/WRI. The entire facility was previously owned and operated by Envirotech Southeast (ETSE) until 2000. The former ETSE facility received D018 (benzene) hazardous waste from off-site sources for processing and treatment. ETSE was considered a Treatment, Storage and Disposal facility under the Resource Conservation and Recovery Act (RCRA). ETSE operated under a Temporary Operating Permit. DLAC/WRI is now in post closure care.

The facility treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. WRI also receives leachate water from solid waste landfills. The leachate waste water is stored in two above ground storage tanks located on facility property east of Bryan Street (Photo 1). Incoming wastewater is treated by gravity separation and/or by dissolved air flotation. It is then chemically treated to adjust the pH in order to induce coagulation and flocculation. The wastewater fraction receives further treatment and processing and is discharged to the local POTW (JEA-Buckman Wastewater Plant). The solids, sludges and residues generated from the facility's activities are de-watered, loaded into roll-off containers, analyzed, and then disposed at an appropriate disposal facility. The waste analyses on the solids indicate that it is a non-hazardous solid waste. WRI has been sending the solids, sludges and residues to the Cheshire Island landfill.

Pursuant to WRI's used oil processor permit, all incoming shipments of used oil, oily wastewater, or other industrial wastewaters require a pre-approved waste profile before arriving at the facility. Upon arrival, the incoming material is sampled and compared to the fingerprint analysis for total organic halogen (TOX) compounds, pH, flashpoint, and general physical appearance prior to final acceptance and off-loading. Segregated used oil is stored on site, analyzed and is transported to other regional processors for further processing and blending into recycled used oil products.

In the loading/off-loading station, located within secondary containment, the facility uses spill collection containers as primary containment to catch leaks from the valves beneath trucks during transfer procedures. Similar containers are used at several other transfer points and line connections within the processing area. The containers observed at the time of inspection were properly labeled with the words "Used Oil."

Laboratory operations generate small amounts of hazardous waste solvents from analytical testing. The waste solvents (designated D001/D002/D003/F003/F005 hazardous waste) are collected in closed and labeled satellite containers located within the laboratory (Photo 2). WRI generates less than five gallons per month of various laboratory waste solvents. This waste is sent to Perma-Fix of Florida (FLD 980 711 071) for disposal.

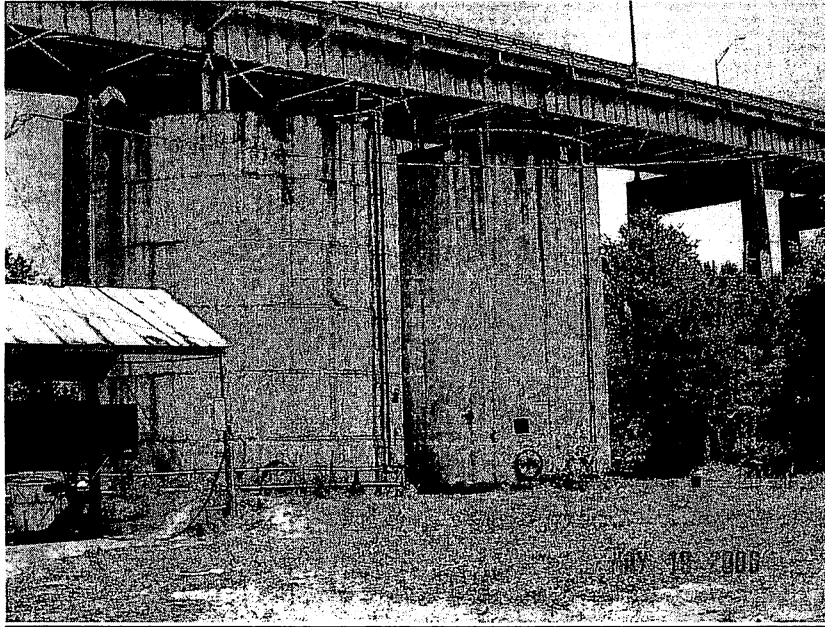


Photo 1

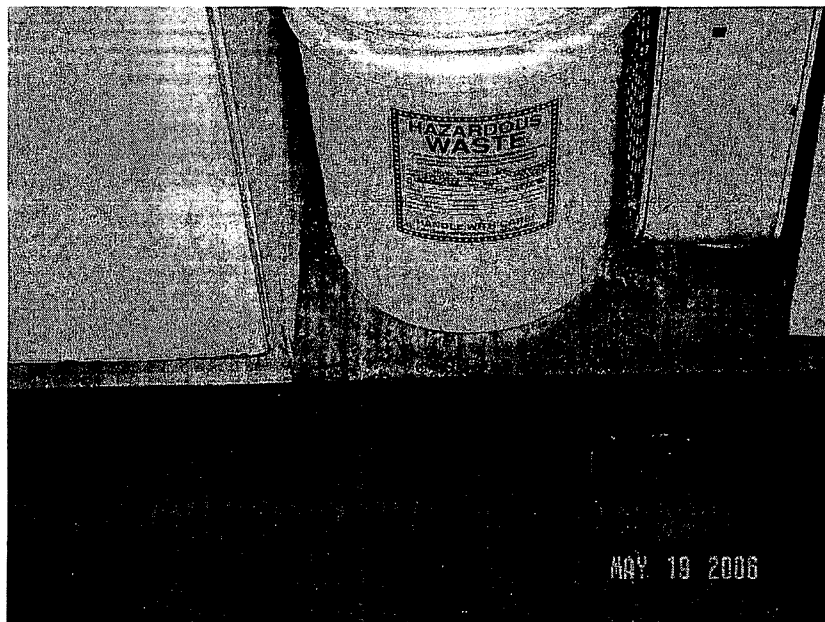
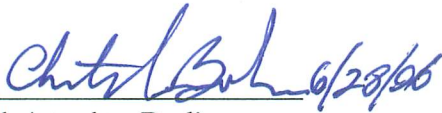


Photo 2

Records Review

A review of the facility's state registrations, financial assurance records, analysis records, shipping records, and Contingency Plan revealed them to be in order. Required daily inspections have been conducted daily and documented weekly, pursuant to the facility's used oil processor permit. Appropriate training has been provided to employees. Water Recovery, Inc. is currently a Conditionally Exempt Small Quantity Generator of hazardous waste.

 6/28/06

Christopher Bodin
Hazardous Waste Engineer
Site Inspector

Vicky Valade
Environmental Manager

Ashwin Patel
Hazardous Waste Supervisor

CESQG CHECKLIST

Facility Name: WRI Date: 5-5-06
 Facility Representative: Mark Owens Facility ID #: FLR 000 069 062
 SIC Codes: _____ Inspector: C. Bodin

40 CFR 261.5

1. Describe the facility's hazardous and potentially hazardous waste streams 40 CFR 262.11:

Waste	EPA Waste #s	Generation Rate	Disposal facility?	Proper Waste ID?
<u>lab waste solvents</u>	<u>1001, 02, 03 F003, 05</u>	<u>15 gal/mo</u>	<u>Pennex FC</u>	<u>Y</u>

(describe discrepancies in waste identification in narrative)

Standards for Conditionally Exempt Small Quantity Generators - 40 CFR 261.5

- Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? Y ☒ N _____
- And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? Y ☒ N _____
- Has the facility obtained an EPA ID #? (not required for CESQGs) Y ☒ N _____
- Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? (40 CFR 261.5) Describe discrepancies in narrative. Y ☒ N _____
- Is the facility disposing of hazardous waste by mixing with used oil? Y _____ N ☒
- Can the facility document proper disposal of all hazardous wastes? Y ☒ N _____
- Are any hazardous wastes treated or disposed of on site? Describe in narrative: Y _____ N ☒
- Are there any unpermitted discharges of other wastes to the environment? Y _____ N ☒

USED OIL PROCESSOR CHECKLIST

Facility Name: WRI Date: 5-5-06
Facility Representative: Mark Owens Facility ID: FLR-000-869-862
Inspector: _____ Registration #: _____

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y_____ N ✓
Transporter or burner processing incidental to normal course of operations? Y_____ N_____
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ✓ N_____
3. Is the processor Registered? (62-710.500(1)(b)) Y ✓ N_____
4. Does the processor have a general permit? 62-710.800(1)) Y ✓ N_____
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y_____ N ✓

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ✓ N_____
Is the facility a registered used oil filter processor? (62-710.850) Y ✓ N_____
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ✓ N_____
Closed or otherwise protected from weather? Y ✓ N_____
Labeled "Used Oil Filters"? Y ✓ N_____
Stored on an oil impervious surface? Y ✓ N_____
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ✓ N_____
Name and street address of each destination or end user? Y ✓ N_____
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ✓ N_____
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ✓ N_____

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ N
2. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C. rules?
(Applicable to USTs over 110 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y ✓ N

Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs ? Applies to all ASTs regardless of size per 279.54(d & e) Y ✓ N
3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ✓ N
4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ✓ N

Is the containment system impervious to oil so as to prevent migration? Y ✓ N
5. Are ASTs, UST tank fill lines and containers labeled "used oil? (279.54(f)) Y ✓ N
6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ✓ N

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ✓ N
2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?(279.52(a)) Y ✓ N
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ✓ N

Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y ✓ N
4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ✓ N
5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ✓ N
6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y ✓ N
7. Is the emergency equipment inspected and tested periodically?
Frequency? weekly Y ✓ N

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y ✓ N _____
9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
- Fire Department: _____ Y ✓ N _____
- Police: _____ Y ✓ N _____
- Hospital: _____ Y ✓ N _____
- Emergency Response Contractor: _____ Y ✓ N _____
10. If not, has the facility attempted to do so and is the refusal documented? Y _____ N /A

Contingency Plans and Emergency Response – 279.52(b)

1. Does the facility have a contingency plan? Y ✓ N _____
2. Is it at the facility and easily available? Y ✓ N _____
3. Does the plan include:
- Fire Response Procedure: (compare to 279.52(b)(6)) N/A _____ Y ✓ N _____
- Spill Response Procedures: " N/A _____ Y ✓ N _____
- Explosion Response Procedures: " N/A _____ Y ✓ N _____
- Instructions for handling contaminated materials & residues Y ✓ N _____
- A description of arrangements with local authorities: N/A _____ Y ✓ N _____
- Emergency Coordinators: (Name) Mark Dumas Y ✓ N _____
- Addresses and telephone numbers of Emergency Coordinators: Y ✓ N _____
- Emergency equipment list: Y ✓ N _____
- Specifications and capabilities of emergency equipment: Y ✓ N _____
- Locations of emergency equipment: Y ✓ N _____
- An evacuation plan and routes: Y ✓ N _____
- Evacuation/alarm signals: Y ✓ N _____
- External reporting procedures: Y ✓ N _____
- Internal recordkeeping requirements: Y ✓ N _____
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ✓ N _____
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y ✓ N _____
6. Is the emergency coordinator authorized to commit funds for incident response? Y ✓ N _____
7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ✓ N _____
9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y ✓ N _____

Rebuttable Presumption and Analysis Plan – 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ☒ N ☐
2. Is the 1,000 ppm halogen determination made by testing? Y ☒ N ☐
If so, does the analysis plan cover: (279.55(a)(2))
Sampling methods? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the 1,000 ppm halogen determination made by process knowledge? Y ☐ N ☒
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ☐ N ☒
3. Have any analyses showed exceedances of the 1,000 ppm level? Y ☐ N ☒
If so, was the oil managed as hazardous waste? Y ☐ N ☒
If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ☐ Y ☐ N ☒
4. Is the used oil fuel specification determination made by testing?
If so, does the analysis plan cover: (279.55(b)(2))
Sampling methods? Y ☒ N ☐
Whether the oil will be tested before or after processing? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the used oil fuel specification determination made by process knowledge? Y ☐ N ☒
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ☐ N ☒
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A ☐ Y ☒ N ☐
If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A ☒ Y ☐ N ☒
6. Are test records or copies of records providing basis for determinations kept for 3 years? Y ☒ N ☐

Recordkeeping and Reporting – 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of oil provider (if applicable)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Name & Address of the transporter delivering the oil to the facility?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of the transporter delivering the oil	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil shipped?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Type of oil received (62-710.510(1)(c))	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of shipment?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of receiving facility?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Name & Address of transporter delivering the oil?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of transporter?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil delivered?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
End Use of the oil? (62-710.510(1)(e))	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of delivery?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ☒ N ☐

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ☒ N ☐

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y ☐ N ☒

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ☒ N ☐

Closure – 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y ☒ N ☐

2. Does the plan include procedures for removing containers of oil and residues?

Y ☒ N ☐

Cleaning and decontaminating tanks and ancillary equipment?

Y ☒ N ☐

Removing contaminated soils?

Y ☒ N ☐

Eliminating the need for further maintenance?

Y ☒ N ☐

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.