



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 10, 2003

Ms. Jan M. Barnes
Transflo Corporation
6735 Southpoint Drive South, J975
Jacksonville, Florida 32216-6117

Dear Ms. Barnes:

Transflo Corporation
DEP/EPA ID: FLD 984 253 526
Duval County - Hazardous Waste

Thank you for your assistance during the hazardous waste RCRA compliance evaluation inspection conducted by the department at your facility on February 20, 2003.

Based on this inspection, your facility was found to be in violation of Florida Statutes and Rules concerning hazardous waste. The violations are set forth in the "Summary of Violations and Corrective Actions" section of the inspection report. Subsequent to the inspection, you submitted information stating the violations had been corrected. Since your facility has returned to compliance, no enforcement action will be taken.

Enclosed are the inspection report and checklist that document this visit. Your continued cooperation is appreciated. If you have any questions please call me at (904) 807-3300, ext. 3369.

Sincerely,

Alan Annicella
Environmental Specialist
Hazardous Waste Section

AAA:aa

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

DOCKET # 03.7



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HAZARDOUS WASTE INSPECTION REPORT

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

FACILITY NAME: Transflo Corporation

DEP/EPA ID #: FLD 984 253 526

STREET ADDRESS: 116 Railroad Druid Street, Jacksonville, Florida 32254

MAILING ADDRESS: 6735 Southpoint Drive South, J975, Jacksonville, Florida 32216

COUNTY: Duval PHONE: (904) 279-6323 DATE: 2/20/03 TIME: 10:00 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 checked="" type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input checked="" 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 type="checkbox"/> 62-737, FAC | <input type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL: Jan M. Barnes, Assistance Director, HS & E and Quality

4. INSPECTION PARTICIPANTS: Anthony M. Strobe, Kinder Morgan

Alan Annicella, FDEP

5. LATITUDE/LONGITUDE: 30°5'8" / 81°37'9"

6. TYPE OF OWNERSHIP: private federal state county municipal

7. PERMIT #: n/a

ISSUE DATE:

EXP. DATE:

"More Protection, Less Process"

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PROCESS DESCRIPTION:

Transflo Corporation was inspected on February 20, 2003 as an unannounced hazardous waste compliance evaluation inspection. Mr. Anthony M. Strobe, Terminal Manager, participated in the inspection. Ms. Jan M. Barnes, Assistant Director of HS & E and Quality, participated via phone. Transflo Corporation is a used oil and hazardous waste transporter and transfer facility.

SITE INSPECTION:

Transflo Corporation transports used oil and hazardous waste. Transflo transports all of the waste using a manifest system. Transflo maintains copies of all manifests on-site. These manifests contain the information required by 40 CFR 263.20 for hazardous waste manifests and 40 CFR 279.46 for used oil shipping papers.

At the time of the inspection there was one railcar of used oil and one railcar of hazardous waste at the facility. The railcars were stored in the areas that had been designated in the Closure Plan.

Transflo Corporation is a registered used oil and hazardous waste transfer facility. Transflo Corporation has not submitted an up to date closure plan that satisfies the closure performance, notification and decontamination standards of 40 CFR 265, Subpart G. **Transflo Corporation is in violation of 40 CFR 265, Subpart G.** Based on the inspection, Transflo Corporation is currently meeting the requirements for used oil transfer facilities.

To maintain status as a transporter and transfer facility of hazardous waste and used oil, Transflo Corporation annually verifies financial responsibility with the Department, pursuant to Chapter 62-730.170 (3), Florida Administrative Code (FAC) for hazardous waste and Chapter 62-710.600, FAC for used oil. Transflo Corporation carries liability insurance through AEGIS Insurance Services, Inc. Their current policy expires April 30, 2004.

SUMMARY OF VIOLATIONS AND CORRECTIVE ACTIONS:

40 CFR 265, Subpart G – Closure and Post-Closure

VIOLATION:

Transflo Corporation has not submitted a written Closure Plan to the Department.

CORRECTIVE ACTION:

No further action is required. Subsequent to the inspection, Transflo Corporation submitted a written Closure Plan to the Department. Based on a review of the plan, it appears that it meets the requirement of 40 CFR 265, Subpart G. Transflo Corporation is reminded that this plan should be available for review during any inspection. Additionally, if the plan needs to be amended, Transflo Corporation should follow the steps that are outlined in 40 CFR 265.112.

Site Inspector:

Alan A. Annicella 6/30/03

Alan A. Annicella
Environmental Specialist
Hazardous Waste Section

Approved by:

Vicky G. Valade 7/10/03

Vicky G. Valade
Environmental Manager
Hazardous Waste Section

Approved by:

for Vicky G. Valade 7/10/03

Ashwin B. Patel
Hazardous Waste Supervisor
Hazardous Waste Section

Facility: Transflow Corporation
Date: February 20, 2003
Alan A. Annicella
Alan A. Annicella

TRANSPORTERS CHECKLIST

1. Site Name: Transflow Corporation

Transporter Requirements (40 CFR 263)

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500) Y X N
2. Does transporter have an EPA identification number? (263.11(a)) Y X N
3. Does the transporter use manifest system as required by 263.20? Y X N

Do the manifests contain at least:

- a. Name, address, and EPA ID of transporter? Y X N
- b. Name, address, and EPA ID code of generator? Y X N
- c. Name, address, identification code of designated permitted facility? Y X N
- d. Corresponding manifest document number? Y X N
- e. Description and quantity of each hazardous waste? Y X N
- f. Signature of subsequent transporters? Y X N
- g. Signatures signifying proper delivery or reasons why delivery could not be certified? Y N n/a

- h. EPA waste codes? Y X N
4. International shipments: (263.20(g)) NA X

- a. Record of date waste left U.S.? Y N
- b. Presence of one signed copy in records? Y N
- c. Signed copy of manifest returned to the generator? Y N
- d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? Y N

5. For SQG waste:
- a. Is waste transported according to reclamation agreement? Y N X
- b. Is following information recorded on a shipping paper:

Facility: _____
Date: _____

Name, address, and EPA ID of waste generator

Y _____ N _____

Quantity of waste accepted

Y _____ N _____

DOT - required shipping info

Y _____ N _____

Date waste is accepted

Y _____ N _____

c. Does transporter carry this shipping paper during transport?

Y _____ N _____

d. Are records maintained for three years after termination or expiration of reclamation agreement?

Y _____ N _____

6. Are copies of the manifest retained for 3 years? (263.22)

Y ☒ N _____

7. Is there evidence of discharge of hazardous waste? (263.30)

Y _____ N ☒

8. Has transporter demonstrated the financial responsibility required under 62-730.170(2)

Y ☒ N _____

9. Does the transporter verify financial responsibility with the Department annually (62-730.170(3))?

Y ☒ N _____

Transfer Facility Requirements (62-730.171)

1. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Y ☒ N _____

Y ☒ N _____

a.. Is the hazardous waste packaged according to 262.30? (263.12)

2. General Facility Standards (265 Subpart B)

a. Security (265.14)

(1) Is the facility security system adequate to minimize unauthorized entry?

Y ☒ N _____

(2) Are signs posted and legible for 25 feet?

Y ☒ N _____

b. Inspection Requirement (265.15)

(1) Does the facility have a copy of the Inspection Plan?

Y ☒ N _____

(2) Does the facility have completed inspection logs?

Y ☒ N _____

(3) Were the deficiencies corrected in a timely manner?

Y ☒ N _____

(4) Are the inspection logs maintained at the facility for 3 years?

Y ☒ N _____

c. Personnel Training (265.16)

(1) Do management personnel complete hazardous waste training?

Y ☒ N _____

Facility: _____
Date: _____

Is training on the job?
Is training in the classroom?

Y X N _____
Y X N _____

(2) Do laborers who handle hazardous waste complete training?

Y X N _____

Is training on the job?
Is training in the classroom?

Y X N _____
Y X N _____

(3) Does training include:

Emergency response procedures?
Inspection procedures?
Operation of hazardous waste handling equipment?

Y X N _____
Y X N _____
Y X N _____

(4) How often is training reviewed? Monthly / Yearly

(5) Does the facility have personnel training records including:

Job title and description of position?
Description of employee's training

Y X N _____
Y X N _____

(6) Is training successfully completed within 6 months of hiring/
transfer to HW position?

Y X N _____

(7) Are records maintained for three years at the facility?

Y X N _____

d. Ignitable, Reactive, or Incompatible Waste (265.17)

(1) Is the waste separated and confined from sources of ignition or
reaction, sparks, spontaneous ignition, and radiant heat?

Y X N _____

(2) Are "No Smoking" signs posted in the area?

Y X N _____

3. Preparedness and Prevention (265 Subpart C)

a. Is there evidence of fire, explosion or contamination of the
environment? (265.31 Maintenance and Operation of Facility)

Y _____ N X

If yes, use narrative explanation.

b. Is the facility equipped with (265.32 - required equipment):

(1) Internal communications or alarm system?
Is it easily accessible in case of emergency?

Y X N _____
Y X N _____

(2) Telephone or two-way radio to call emergency response
personnel?

Y X N _____

(3) Portable fire extinguishers, fire control equipment, spill control
equipment and decontamination equipment?

Y X N _____

Is this equipment tested to assure its proper operation?

Y X N _____

Facility: _____
Date: _____

How frequently? Monthly + Yearly

(4) Water of adequate volume for hoses, sprinklers or water spray system?

Y _____ N _____

n/a

(a) Describe source of water. _____

(b) Indicate flow rate and/or pressure and storage capacity, _____
if applicable. _____

c. 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.) (265.35 - Required Aisle Space)

Y X N _____

d. 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.) (265.37 - Arrangements with Local Authorities)

Y X N _____ NA _____

If NA, explain _____

e. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)

Y _____ N _____ NA X

If yes, indicate primary authority. _____

Is the fire department a city or volunteer fire department? _____

f. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)

Y X N _____

Are they readily available to the emergency coordinator?

Y X N _____

g. 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? (265.37 - Arrangements with Local Authorities)

Y X N _____

If no, has the owner/operator attempted to do this?

Y _____ N _____

h. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities)

Y _____ N _____

n/a

n/a

4. Contingency Plan and Emergency Procedures (265 Subpart D)

a. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)

Y X N _____

Facility: _____
Date: _____

b. Is it maintained at the facility? (265.53 - Copies of Contingency Plan) Y X N _____

c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan) Y X N

(1) Does the plan include:

(a) Action personnel will take? Y X N _____

(b) Evacuation routes? Y X N _____

(c) Emergency Equipment? Y X N _____

(d) Is the emergency equipment properly inspected and maintained? Y X N _____

d. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator) Y X N _____

e. Who is the emergency coordinator? Anthony M. Strade

f. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan) Y X N _____

g. Has the facility supplied DEP with a copy of the Contingency Plan? (62-730.171(2)(a)) Y X N _____

5. Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)

a. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.) Y X N _____

b. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Y X N _____

c. Is the waste compatible with the containers and/or its liner? (265.172) Y X N _____

d. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173) Y _____ N X

If yes, explain using narrative.

e. Are each of the containers inspected at least weekly (265.174)? Y X N _____

If no, explain using narrative concerning the frequency of inspection.

f. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176) Y X N _____

If yes, explain using narrative.

g. Are incompatible wastes stored in the same containers? Y _____ N X

Facility: _____
Date: _____

If yes, explain using narrative.

h. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

Y _____ N _____ *n/a*

If no, explain using narrative.

6. 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? (62-730.171(2)(b))

Y ~~_____~~ N X
Y ~~_____~~ N X

corrected
Violation

Has the facility supplied DEP with a copy of the plan?

7. 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? (62-730.171(2)(d))

Y X N _____

8. Is a written log maintained for all waste entering or leaving the transfer facility? (62-730.171(2)(e))

Y X N _____

Does the log contain:

Generators' names?

Y X N _____

Manifest numbers?

Y X N _____

Dates when waste enters and leaves facility?

Y X N _____

9. Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)? (62-730.171(3))

Y X N _____

10. Does the transfer facility have an EPA/DER ID number?

Y X N _____

Unregulated Wastes
(Household/Conditionally Exempt/Small Quantity Generator Wastes)

NA X

1. Does the transporter have documentation that this waste was generated by an unregulated source?

Y _____ N _____

2. If no, is the transporter assuming responsibility as the generator of this waste?

Y _____ N _____

a. If yes, complete the applicable Generator or Small Quantity Generator checklist.

b. 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:

(1) 90 days after initial inspection if the quantity of "unregulated"

Facility: _____
Date: _____

wastes on site exceed 1000 kg.

(2) 180 days after initial inspection if the quantity of "unregulated"
wastes on site are less than 1000 kg.

3. Does the transporter mix/consolidate hazardous wastes of different
DOT shipping descriptions 263.10(c)(2)?

Y _____ N _____

N/A

If yes, complete the Generator checklist.

Land Disposal Restrictions

1. Does the transporter manage restricted (land ban) wastes?

Y X N _____

If yes, check appropriate box(es).

"California List"

F-- List Solvents

First Third

Second Third

Third Third

Soil and Debris

USED OIL TRANSPORTER CHECKLIST

Facility Name: Transflow Corporation Date: February 20, 2003
Facility Representative: Anthony Strade + Jan Barnes Facility ID #: FLD 984 253 526
Inspector: Alan A. Annicella Registration #: _____
Alan A. Annicella

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? (279.40(a))

Y _____ N X

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 generator ?

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)

Y _____ N N/A

3. Does the transporter process used oil incidental to transport? (279.41)

Y _____ N _____

Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?

N/A X Y _____ N _____

If not, has the transporter conducted a hazardous waste determination? (279.10(e))

N/A X Y _____ N _____

4. Has the facility notified of used oil activities? Check EPA form 8700-12

Y X N _____

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a))

Y X N _____

6. Does the transporter comply with DOT requirements? (279.43(b))

Y X N _____

7. If any oil is discharged during transport, does the transporter: (279.43(c))

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Y _____ N _____

Report to DOT in writing per 49 CFR 171.16?

Y _____ N _____

Clean up any discharges until the discharge poses no threat?

Y _____ N _____

8. Does the facility also transport used oil filters?

Y _____ N X

If so, 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 _____

Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y X N _____

EPA ID # of oil provider (if applicable)?

Y X N _____

Quantity of oil shipped?

Y X N _____

Date of shipment?

Y X N _____

Signature of oil provider, dated upon receipt?

Y X N _____

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y X N _____

EPA ID # of receiving facility or transporter?

Y X N _____

Quantity of oil delivered?

Y X N _____

Date of delivery?

Y X N _____

Signature of oil receiver, dated upon receipt?

Y X N _____

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))

Y X N _____

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

Y X N _____

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

Y X N _____

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? (62-710.530)?

Y _____ N _____ *n/g*

7. 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 X N _____

Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)

Y X N _____

2. Does the facility maintain training records? (62-710.600(2)(c))

Y X N _____

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))

Y X N _____

4. Is the facility registration form and ID number displayed? (62-710.500)

Y X N _____

Transfer Facility Standards - 279.45

- 1 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

N/A _____ Y X N _____

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?

Y X N _____

- 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?

Y X N _____

Is this done by testing?

Y X N _____

Is this done by process knowledge? Describe basis in narrative.

Y X N _____

Are test records or copies of records providing basis for determination kept for 3 years?

Y X N _____

- 3 Have any analyses showed exceedances of the 1,000 ppm level?

Y _____ N X

If so, was the oil managed as hazardous waste?

Y _____ N _____ n/a

If not, was the oil exempt? Describe in narrative.

N/A X Y _____ N _____

- 4 Is used oil stored only in tanks or containers? (Circle applicable units)

Y X N _____

- 5 If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Y _____ N _____ n/a

Is secondary containment provided and adequate?

Y _____ N _____ n/a

- 6 Are containers, and tank trailers in good condition and not leaking?

Y X N _____

- 7 Are containers provided with secondary containment consisting of walls and floor at a minimum?

Y X N _____

Is the containment system impervious to oil so as to prevent migration?

Y X N _____

- 8 Are ASTs, UST tank fill lines and containers labeled "used oil?"

Y _____ N _____ n/a

- 9 Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? (62-710.850)

N/A X Y _____ N _____

- 10 Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?

Y X N _____