

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





Department of Environmental Protection

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

David B. Struhs Secretary

HAZARDOUS WASTE INSPECTION REPORT

| 1. INSPECTION TYPE: ⊠ | Compliance Evaluation Compla | int Follow-up Permitting |
|---|---|---|
| FACILITY NAME: Trans | sflo Corporation DE | P/EPA ID #: FLD 984 253 526 |
| STREET ADDRESS: 116 | 6 Railroad Druid Street, Jacksonvil | le, Florida 32254 |
| MAILING ADDRESS: 6 | 735 Southpoint Drive South, J975 | , Jacksonville, Florida 32216 |
| COUNTY: Duval PH | ONE: (904) 279-6323 DATE: | 2/20/03 TIME: 10:00 a.m. |
| HW Facility Status | Used Oil Facility Status | Hg Facility Status |
| Non-handler CESQG SQG LQG Transporter Transfer facility TSD | Generator Transporter Transfer facility Marketer Processor On-spec. burner Off-spec. burner Filter generator Filter transporter | Exempt Generator Transporter Hg recovery facility Hg reclamation facility PCW facility status Producer |
| SQH | Filter transfer facility | Transporter |
| ☐ LQH 2. APPLICABLE REGULA | Filter processor | Recovery facility |
| □ 40 CFR 261.5 □ 40 CFR 265 □ 40 CFR 273 □ | 40 CFR 262 | 268 |
| 3. RESPONSIBLE OFFICIA | AL: Jan M. Barnes, Assistance Di | rector, HS & E and Quality |
| 4. INSPECTION PARTICIP | ANTS: Anthony M. Strode, Kin | der Morgan |
| | Alan Annicella, FDEP | |
| 5. LATITUDE/LONGITUDE | E: 30°5'8" / 81°37'9" | |
| 6. TYPE OF OWNERSHIP: | <u>private</u> federal state of | county municipal |
| 7. PERMIT #: n/a | ISSUE DATE: EX | CP. DATE: |

"More Protection, Less Process"

Transfloorporation Hazardous Waste Inspection of February 20, 2003 Page 1

PROCESS DESCRIPTION:

Transflo Corporation was inspected on February 20, 2003 as an unannounced hazardous waste compliance evaluation inspection. Mr. Anthony M. Strode, 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.

Transflo Corporation Hazardous Waste Inspection of February 20, 2003 Page 2

SUMMARY OF VIOLATIONS AND CORRECTIVE ACTIONS:

Innicella 6/30/02

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

Environmental Specialist Hazardous Waste Section

Approved by:

Vicky Ø. Valade

Environmental Manager

Hazardous Waste Section

Approved by:

Ashwin B. Patel

Hazardous Waste Supervisor

Hazardous Waste Section

Facility: Transflow Corporation

Date: February 20, 2003

Alan A. Annicella

Wan 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? | YN |
| | Do the manifests contain at least: | |
| | a. Name, address, and EPA ID of transporter? | $_{ m Y}$ $_{ m N}$ |
| | b. Name, address, and EPA ID code of generator? | Y_X_N |
| | c. Name, address, identification code of designated permitted facility? | YN |
| | 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? | ynn/a |
| | h. EPA waste codes? | YN |
| 4. | International shipments: (263.20(g)) | NAX |
| | a. Record of date waste left U.S.? | YN) |
| | b. Presence of one signed copy in records? | YN \rightarrow \int \lambda \lam |
| | c. Signed copy of manifest returned to the generator? | YN |
| | d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? | YN |
| 5. | For SQG waste: | |
| | a. Is waste transported according to reclamation agreement? | YN_X |

b. Is following information recorded on a shipping paper:

| Facility: Date: | |
|-----------------|---|
| | YN \ |
| |) (|
| | YN \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ |
| | YN/ |
| | YN/ |
| | YN _/9 |
| | YN |
| | $_{\text{Y}} \underline{\times}_{\text{N}}$ |
| | YN_X |
| d | |
| nrtment | _N |
| ts (62-730.171) | |
| acilities? | |
| - 44 | , X |
| 3.12) | YN |
| | |
| uthorized | × |
| | YN |
| | Y_X_N |
| | Y_X_N |
| | V X N |
| | Y_X_N YN |
| | YN Y_X_N |
| years? | Y_/_N |
| | Y_X_N |
| raining? | I / V N |

Name, address, and EPA ID of waste generator

Quantity of waste accepted

DOT - required shipping info

Date waste is accepted

- c. Does transporter carry this shipping paper during transport?
- d. Are records maintained for three years after termination or expiration of reclamation agreement?
- 6. Are copies of the manifest retained for 3 years? (263.22)
- 7. Is there evidence of discharge of hazardous waste? (263.30)
- 8. Has transporter demonstrated the financial responsibility required under 62-730.170(2)
- 9. Does the transporter verify financial responsibility with the Department annually (62-730.170(3))?

Transfer Facility Requirements (62-730.171)

- Does transporter comply with 10 day storage limit for transfer facilities?
 (263.12) 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?
 - (2) Are signs posted and legible for 25 feet?
 - b. Inspection Requirement (265.15)
 - (1) Does the facility have a copy of the Inspection Plan?
 - (2) Does the facility have completed inspection logs?
 - (3) Were the deficiencies corrected in a timely manner?
 - (4) Are the inspection logs maintained at the facility for 3 years?
 - c. Personnel Training (265.16)
 - (1) Do management personnel complete hazardous waste training?

| | | | \ / |
|----|-----|--|--------------------------------|
| | | Is training on the job? | YN |
| | | Is training in the classroom? | Y_X_N |
| | | | . |
| | | (2) Do laborers who handle hazardous waste complete training? | Y_X_N |
| | | | v × N |
| | | Is training on the job? Is training in the classroom? | Y V |
| | | is training in the classroom: | - |
| | | (3) Does training include: | 1 |
| | | Emergency response procedures? | YN |
| | | Inspection procedures? | Y_X_N |
| | | Operation of hazardous waste handling equipment? | 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? | $_{\rm Y}$ \times $_{\rm N}$ |
| | | Description of employee's training | YX_N |
| | | | |
| | | (6) Is training successfully completed within 6 months of hiring/ | × |
| | | transfer to HW position? | YN |
| | | (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 |
| | | | X |
| | | (2) Are "No Smoking" signs posted in the area? | Y_/\N |
| 3. | Pre | paredness and Prevention (265 Subpart C) | , |
| | a. | Is there evidence of fire, explosion or contamination of the | \times |
| | | vironment? (265.31 Maintenance and Operation of Facility) | YN |
| | | • | |
| | Ify | es, use narrative explanation. | |
| | b. | Is the facility equipped with (265.32 - required equipment): | • |
| | | (1) Internal communications or alarm system? | $_{\rm Y}$ \times $_{\rm N}$ |
| | | Is it easily accessible in case of emergency? | $Y \times N$ |
| | | · | |
| | | (2) Telephone or two-way radio to call emergency response | × |
| | | personnel? | YN |
| | | (3) Portable fire extinguishers, fire control equipment, spill control | Y X N |
| | | equipment and decontamination equipment? | YN |

Is this equipment tested to assure its proper operation?

| | Pacility: Date: |
|--|--|
| How frequently? Monthly + 1890/y | |
| (4) Water of adequate volume for hoses, sprinklers or water sp system? | ray YN <i>N</i> |
| (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 bacheck for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) | of rrels to YN |
| d. Has the owner/operator made arrangements with the local autito familiarize them with characteristics of the facility? (Layout of familiarize them with characteristics of the facility? (Layout of facility of the facility personnel would normally be working, entrances to inside facility, possible evacuation routes.) (265.37 - Arrangements Local Authorities) | acility, les roads |
| If NA, explain | |
| In the case that more than one police or fire department might is there a designated primary authority? (265.37 - Arrangements v Local Authorities) | respond, vith YNNA |
| 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 agreemen state emergency response teams, emergency response contractors a equipment suppliers? (265.37 - Arrangements with Local Authorit | ind 🗙 |
| Are they readily available to the emergency coordinator? | Y_X_N |
| g. Has the owner/operator arranged to familiarize local hospitals properties of hazardous waste handled and types of injuries that coresult from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorites) | YN |
| If no, has the owner/operator attempted to do this? | YN |
| h. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation (265.37 - Arrangements with Local Authorities) | record? YN \(\begin{align*} \empty / 9 \\ \empty _N \empty \empty \q \q \empty \q \q \empty \q \empty \q \empty \q \empty \q \empty \q \empty \ |
| Contingency Plan and Emergency Procedures (265 Subpart D) | • |
| a. Does the facility have a contingency plan? (265.51 - Purpose Implementation of Contingency Plan) | and YN |

4.

| | Facility: |
|--|----------------------------|
| • | Date: |
| b. Is it maintained at the facility? (265.53 - Copies of Contingend | cy Plan) Y NN |
| c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan) | ıt YN |
| (1) Does the plan include: | |
| (a) Action personnel will take? | YN |
| (b) Evacuation routes? | YN |
| (c) Emergency Equipment? | YN |
| (d) Is the emergency equipment properly inspected and maintained? | YN |
| d. Is there an emergency coordinator on site or within short drividistance of the plant at all times? (265.55 - Emergency Coordinator | or) |
| e. Who is the emergency coordinator? Anthony M. | Strodt |
| f. Has the facility supplied local police and fire departments with copy of the contingency plan? (265.53(b) - Content of Contingency | |
| g. Has the facility supplied DEP with a copy of the Contingency (62-730.171(2)(a)) | Plan? YN |
| Container Storage Checklist (Subpart I - Use and Management of | <u>Containers 265.170)</u> |
| a. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.) | YN |
| b. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? | Y_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 st in such a manner as to cause the container to rupture or leak? (265 | |
| If yes, explain using narrative. | \ |
| e. Are each of the containers inspected at least weekly (265.174) | 7 Y_N |
| If no, explain using narrative concerning the frequency of inspection | on. |
| f. Are containers holding ignitable or reactive wastes located at 1 15 meters (50 feet) from the facility property line? (265.176) | east Y_N |
| If yes, explain using narrative. | 10 |
| g. Are incompatible wastes stored in the same containers? | YN_X_ |

5.

| Facility: Date: | |
|--|----------------------------|
| If yes, explain using narrative. | |
| h. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? | YN 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)) Has the facility supplied DEP with a copy of the plan? | corrected YMN X Violation |
| 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_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? Manifest numbers? Dates when waste enters and leaves facility? | YN YN YN |
| 9. Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)? (62-730.171(3)) | YN |
| 10. Does the transfer facility have an EPA/DER ID number? | YN |
| Unregulated Wastes (Household/Conditionally Exempt/Small Quantity Generally) | erator Wastes) |
| 1. Does the transporter have documentation that this waste was generated by an unregulated source? | YN |
| 2. If no, is the transporter assuming responsibility as the generator of this waste? | YN |
| a. If yes, complete the applicable Generator or Small Quantity Generator checklist. | > n/a |
| 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 in meeting should be scheduled as follows: | |

Rev. 05/25/99

inspection should be scheduled as follows:

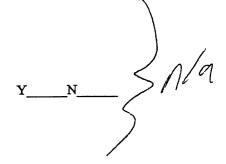
(1) 90 days after initial inspection if the quantity of "unregulated"

| ` | |
|------------|--|
| 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)?

If yes, complete the Generator checklist.



Land Disposal Restrictions

| 1. | Does the transporter manage restricted (land ban) wastes? | YN |
|----|---|------|
| 1. | Does the transporter manage restricted (land ban) wastes? | 1_/N |

If yes, check appropriate boxx(es).

USED OIL TRANSPORTER CHECKLIST

| Fac | ility Name: Transflow Corporation Date: February Stroke + Jan Barnes Facility ID#: FLD Dector: Alan A. Annicella Registration# | 1ry 20, 20 984 253 | <u>v</u> 3 <u>5</u> 26 - |
|-----|---|-----------------------|--------------------------------|
| 1. | Is the facility exempt under any of the following? (279.40(a)) | Y N | |
| | 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 | <u></u> |
| | Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? | Y N | |
| | If not, has the transporter conducted a hazardous waste determination? (279.10(e)) | 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)) | <u> </u> | |
| 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)) | | They.11 |
| ٠ | Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? | Y N | - 4 |
| | 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 | |
| | If so, are the filters stored in above ground containers which are: (62-710.850(6)) | | |
| | In good condition? | Y N | - 2 in/a |
| | Closed or otherwise protected from weather? | Y N | - < "/" |
| | Labeled "Used Oil Filters"? | Y N | _ / |
| | Stored on an oil impervious surface? | · | / |

DRAFT Rev. 9-28-95

Transporter Recordkeeping - 279.46

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

Name & Address of facility providing the oil for transport?

EPA ID # of oil provider (if applicable)?

Quantity of oil shipped?

Date of shipment?

Signature of oil provider, dated upon receipt?

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

Name & Address of receiving facility or transporter?

EPA ID # of receiving facility or transporter?

Quantity of oil delivere?

Date of delivery?

Signature of oil receiver, dated upon receipt?

- 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))
- 4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))
- 5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

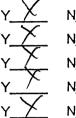
If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

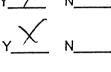
7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

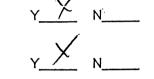
Transporter Certification (62-710 F.A.C.)

- 1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)
- 2. Does the facility maintain training records? (62-710.600(2)(c))
- 3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))
- 4. Is the facility registration form and ID number displayed? (62-710.500)

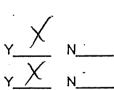
| Y | N |
|------|---|
| Y_X_ | N |
| Y | N |
| Y | N |
| Y_X_ | N |
| | |

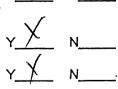






| Y | N | N) |
|----------|---|----|
| \times | | |





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___

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

Is this done by testing?

<u>y__X__N___</u>

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____ 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____

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

4. Is used oil stored only in tanks of containers? Circle applicable units)

Y_ N_ n/a

 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.)

Is secondary containment provided and adequate?

Y____ N____ 1/1/4

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

γ 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 N 0/

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

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

or replacing any leaking units as applicable?

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

10. Does the facility stop operations and clean up releases of used oil, repairing

Y____ N

, X