



Florida Department of Environmental Protection

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Charlie Crist
Governor

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Lt. Governor

Michael W. Sole
Secretary

JUL 28 2010

Mr. Matt McClure, P.E.
JEA Westside Service Center
21 West Church Street #8
Jacksonville, Florida 32202

**Re: JEA Westside Service Center
EPA/DEP ID: FLD 981 027 279
Duval County - Hazardous Waste**

Dear Mr. McClure:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on June 8, 2010. 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 hazardous waste and 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 904.807.3381.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section

ABP
Enclosure(s)



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: JEA Westside Service Center
On-Site Inspection Start Date: 06/08/2010 **On-Site Inspection End Date:** 06/08/2010
ME ID#: 50530 **EPA ID#:** FLD981027279
Facility Street Address: 6727 Broadway Ave, Jacksonville, Florida 32254-2715
Contact Mailing Address: 21 W Church St, Jacksonville, Florida 32202-3155
County Name: Duval **Contact Phone:** (904) 665-6253

NOTIFIED AS:

CESQG (<100 kg/month)
Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility
Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector
Other Participants: Corderal Brown, Inventory Tech

LATITUDE / LONGITUDE: Lat 30° 19' 57.7489" / Long 81° 45' 27.5675"

SIC CODE: 7629 - Services - electrical repair shops, nec

TYPE OF OWNERSHIP: Private

Introduction:

JEA Westside Service Center (JEA) was inspected on June 8, 2010, as an unannounced hazardous waste compliance inspection. The facility notified as a Used Oil Transporter and was registered in April of 2010. The facility has been assigned the EPA ID number FLD981027279. JEA was last inspected in November of 2004.

JEA operates a maintenance facility at this location for its electrical transformers. JEA is a municipal electric utility transporting only its own used oil, generated at its own noncontiguous facilities, to its own central collection facility, and is therefore exempt from the used oil certification program under Section 403.767(1)(c), Florida Statutes.

Process Description:

Hazmat Building:

This building is where trucks triage the waste they accumulate in the field from different sites. Transformers are loaded onto the western side of the building where they are inspected (Photo 1). All transformers (good and bad) have a sample taken of the oil inside. If the sample comes back "hot" (PCB concentration of greater than 45 ppm) they are moved to the eastern side of the Hazmat building to be shipped off to TCI in Alabama (FLD983167891) as PCB contaminated waste, which is regulated under the Toxic Substance Control Act (TSCA). If the concentration is under 45 ppm, and the transformer is not going to be reused, the oil is kept inside the unit and shipped to TCI. If the transformer is able to be reused, and does not come back hot, it is taken to the Transformer Shop to be touched up, repainted, and put back into service.

The facility also generates non-PCB used oil from various machines, which is brought back to the facility and stored in 55-gallon drums (Photos 2-3). These drums were not labeled with the words "Used Oil" [40 CFR 279.22(d)].

Transformer Shop:

Transformers that are going to be put back into service are brought to this area for minor repair and touch up work. Painting is performed in this area generating waste paint and lacquer thinner. The facility uses Interstate Chemical 3400 lacquer thinner in its painting process and for cleaning its guns. According to the MSDS from the manufacturer, 3400 lacquer thinner contains 35-45% toluene, 18-27% acetone, 20-27% methanol, 10-15% MEK, and has a flashpoint of less than 60 degrees Fahrenheit. The DEP has determined that waste paint and 3400 lacquer thinner from cleaning is a D001/F003/F005 hazardous waste. Waste paint is stored in 55-gallon drums in the paint area (Photo 4). At the time of the inspection, there was one full drum of paint waste and another was approximately a tenth full. Both were closed. Acetone is used on rags for cleaning and disposed of to the trash when spent.

Used Oil Tanks:

The facility has three used oil tanks located in the northwest corner of the Hazmat Building. Used oil with a PCB concentration of less than 45 ppm, and only from leaking transformers is transferred into these tanks. The transformers that are leaking are kept in tarps during transportation to the Hazmat Building. The tarp and transformer are set into large metal containment pans (Photo 5) to be staged while testing is performed. Once testing is performed the oil is either pumped into the tanks or containerized (if hot) in 55-gallon drums to be shipped of as a TSCA regulated waste.

Records:

EWS Alabama (ALD981020894) and EQ of Florida (FLD981932494) dispose of the facility's hazardous waste. The last hazardous waste disposal was on 10/29/09 with a total volume of 180 gallons of hazardous waste.

The facility has the potential to be a Small Quantity Generator (SQG) of hazardous waste generator in any one month due to the episodic generation of waste. If the facility generates over 220 pounds of hazardous waste in any one month, the facility would be a SQG and 40 CFR 262.34 accumulation requirements would apply.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type: Violation
Rule: 279.22(c)(1)
Explanation: Four drums of used oil in the Hazmat area were not labeled.
Corrective Action: During the inspection, the facility labeled all of its unlabeled used oil drums.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 279.22(c)(1)		06/08/2010	Four drums of used oil in the Hazmat area were not labeled.

Areas of Concern

No Areas of Concern

Inspection Date: 06/08/2010

ATTACHMENTS:

Photo 1



Photo 2 - used oil drums



Photo 3 - used oil drums



Photo 4



Photo 5

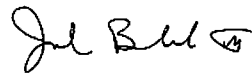



Inspection Date: 06/08/2010

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.

Jabe Breland III**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**DEP**ORGANIZATION**7/27/2010**DATE**Corderal Brown**REPRESENTATIVE NAME**Inventory Tech**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**JEA**ORGANIZATION****Report Approvers:**Ashwin B Patel**SUPERVISOR NAME**Hazardous Waste Supervisor**SUPERVISOR TITLE****SUPERVISOR SIGNATURE**DEP**ORGANIZATION**7/27/2010**DATE**

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 "Potential Violations" or areas of concern.