



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Freehold Cartage Inc

On-Site Inspection Start Date: 08/04/2010

On-Site Inspection End Date: 08/04/2010

ME ID#: 16638

EPA ID#: FLD984187831

Facility Street Address: 175 Bartow Municipal Arprt, Bartow, Florida 33830-9576

Contact Mailing Address: 175 Bartow Municipal Airport, Bartow, Florida 33830

County Name: Polk

Contact Phone: (863) 533-4599

NOTIFIED AS:

SQG (100-1000 kg/month)

Transporter

Transfer Facility

Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

Routine Inspection for Transfer Facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: Michael Hirst

LATITUDE / LONGITUDE: Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Municipal

Introduction:

Freehold Cartage, Inc. (FCI) was inspected on August 4, 2010 to determine the facility's compliance with state and federal hazardous waste regulations. Mr. Hirst accompanied the inspector throughout the inspection. The Department last inspected this facility in September 2008.

Process Description:

FCI is a registered Hazardous Waste, Used Oil, Used Oil Filter and Universal Waste Transporter and Transfer Facility. Operations have not changed since the previous inspection. The facility does not often transport used oil. FCI screens all drums of used oil with Dexsil Clor-Detect kits. Hazardous waste containers are stored up to 10 days within two storage trailers that are not utilized for transport that are located at the loading dock. The facility's emergency equipment, Contingency Plan, training records, transfer log, closure plan and manifests were reviewed during the inspection.

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Inspection Date: 08/04/2010

Hazardous waste storage trailer:**New Potential Violations and Areas of Concern:****Transporters Checklist**

Type: Violation

Rule: 265.35

Question Number: 1.520

Question: 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.)

Explanation: At the time of the inspection, the facility did not have adequate aisle spacing between the hazardous waste containers located within both of the storage trailers. (Corrected)

Corrective Action: Subsequent to the inspection, the facility provided adequate aisle spacing for the hazardous waste containers located within the two storage trailers.

New Potential Violations and Areas of Concern:**Transporters Checklist**

Type: Area Of Concern

Rule: 265.52(f)

Question Number: 1.620

Question: Does the plan include:

Explanation: During the inspection, Mr. Hirst stated that the facility would contact American Compliance Technologies in the event that a cleanup is needed. This policy is not reflected in the facility's Contingency Plan.

Corrective Action: FCI revised the facility's contingency plan to include ACT's services.

Used Oil Transporter

Type: Area Of Concern

Rule: 279.44(a)

Question Number: 29.430

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

Explanation: One of the facility's transport trucks and the driver was inspected during the visit. The inspector inspected the drivers license and health certificate and the truck's fire extinguisher, spill equipment and halogen detection kits. The Dexsil kits on the truck had all expired in September 2008. Mr. Hirst stated that the truck was a back up truck and that the driver's everyday truck had broken down the morning of the inspection.

Corrective Action: Please ensure that transport vehicles are periodically inspected to ensure that all the equipment is current and viable.

Inspection Date: 08/04/2010

Checklist Independent Potential Violations and Areas of Concern

Type: Violation

Rule: 263.20(b)

Explanation: During the inspection, one manifest was observed in which the FCI driver had failed to date the manifest prior to shipping the hazardous waste to the facility. (Corrected)

Corrective Action: Mr. Hirst corrected this during the inspection. The hazardous waste was still located at the facility at the time of the inspection.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 265.35	Hazardous waste storage trailer	08/04/2010	At the time of the inspection, the facility did not have adequate aisle spacing between the hazardous waste containers located within both of the storage trailers. (Corrected)
Checklist Independent Violations 263.20(b)		08/04/2010	During the inspection, one manifest was observed in which the FCI driver had failed to date the manifest prior to shipping the hazardous waste to the facility. (Corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 265.52(f)		08/04/2010	During the inspection, Mr. Hirst stated that the facility would contact American Compliance Technologies in the event that a cleanup is needed. This policy is not reflected in the facility's Contingency Plan.
Used Oil Transporter 279.44(a)		08/04/2010	One of the facility's transport trucks and the driver was inspected during the visit. The inspector inspected the drivers license and health certificate and the truck's fire extinguisher, spill equipment and halogen detection kits. The Dexsil kits on the truck had all expired in September 2008. Mr. Hirst stated that the truck was a back up truck and that the driver's everyday truck had broken down the morning of the inspection.

Inspection Date: 08/04/2010

Conclusion:

At the time of the inspection, Freehold Cartage, Inc. was not in compliance with state and federal hazardous waste regulations governing Hazardous Waste Transfer Facilities. Subsequent to the inspection, the facility returned to compliance.

Inspection Date: 08/04/2010

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.

Shannon D. Camp

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

8/5/2010

DATE

Michael Hirst

REPRESENTATIVE NAME

NO SIGNATURE

REPRESENTATIVE SIGNATURE

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.