

File



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 1, 1999

Mr. Jayson R. Smith, General Manager
Environmental Remediation Services, Inc.
P.O. Box 351419
Jacksonville, Florida 32235-1419

Dear Mr. Smith:

Environmental Remediation Services, Inc. (ERS)
DEP/EPA ID FLD 984 261 412
Duval County - Hazardous Waste

Thank you for your assistance during the hazardous waste RCRA compliance inspection conducted by the Department at your facility on September 27, 1999. Enclosed are the report and inspection checklists which document this inspection.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulations in general, please write to the letterhead address or call me at (904) 448-4320, extension 381.

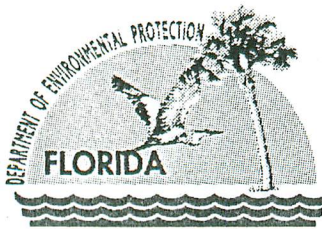
Sincerely,

Richard Sykes
Environmental Specialist

✓
RS:rsm

Enclosure

DOCKET # 99.1



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HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** Routine Complaint Follow-Up Permitting Pre-arranged
FACILITY NAME: Environmental Remediation Services **DEP/EPA ID #:** FLD 984 261 412
STREET ADDRESS: 14600 Duval Place West, Suite 502, Jacksonville, Florida 32235
MAILING ADDRESS: P.O. Box 351419, Jacksonville, Florida 32235-1419
COUNTY: Duval **PHONE:** (904) 741-4744 **DATE:** 9/27/99 **TIME:** 9:00 am

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 type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 270 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

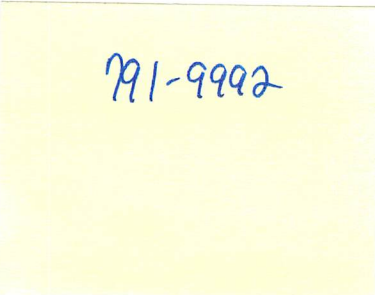
3. **RESPONSIBLE OFFICIAL:** Mr. Jayson R. Smith, General Manager

4. **INSPECTION PARTICIPANTS:** Jayson R. Smith, ERS
Richard Sykes, DEP

5. **LATITUDE/LONGITUDE:** 30°19'47"/81°32'21"

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

7. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**



"Protect, Conserve and Manage Florida's Environment and Natural Resources"

PROCESS DESCRIPTION:

Environmental Remediation Services, Inc. (ERS) is a hazardous waste, used oil, used oil filters, petroleum contact water (PCW) and spent mercury-containing lamps/devices transporter. The facility consists of offices, a warehouse and an outdoor parking lot for company vehicles. This inspection was unannounced.

The facility's operations include environmental site remediation and tank pulls. Typical hazardous wastes transported include D001 flammable liquids, D001/D018 waste gasoline, D002 corrosive wastes, waste solvents (F002, F003 and/or F005), and waste paint materials with variable waste codes. According to Mr. Jayson R. Smith, General Manager, a hazardous waste determination is performed by the generator (pursuant to 40 CFR 262.11) on each waste stream transported. A review of the facility records indicated that copies of waste analyses and determinations are maintained on file. Most of the hazardous waste transported by ERS is sent to Perma-Fix of Gainesville, Florida for proper disposal. Occasionally, some hazardous waste may be shipped to Safety-Kleen of Orange Park, Florida for disposal. The last shipment of hazardous waste transported to Perma-Fix was one 55-gallon drum of F002/F005 waste solvent on August 2, 1999.

The ERS transportation fleet consists of three 3300 gallon capacity vacuum trucks, one covered truck, one stake-bed truck and one dump-body truck. Drums containing hazardous waste are picked up from the generator's site in either the covered truck or the stake-bed truck. The drums are then transported directly to either a secondary transporter or a permitted treatment, storage or disposal facility. Rarely, a truck containing hazardous waste may remain at the facility overnight. The drums of hazardous waste are not off-loaded from the truck, and the drums do not remain at the facility longer than 24 hours. The facility is reminded that, if hazardous waste is stored at the facility longer than 24 hours, the facility will be required to comply with transfer facility requirements, pursuant to Florida Administrative Code (FAC) 62-730.171.

Occasionally, hazardous waste (consisting of either D001/D018 waste gasoline or D002 corrosive waste) is transported in one of the vacuum trucks. According to Mr. Smith and the facility analytical records, the vacuum truck is cleaned of any hazardous waste residue, pursuant to 40 CFR 261.7, prior to being used to transport another waste stream.

Petroleum contact water (PCW) is transported in drums or in the vacuum trucks to either a permitted PCW recovery facility such as Industrial Water Services (IWS) or a permitted treatment, storage, or disposal facility such as Perma-Fix. A review of the facility's operating records revealed that ERS is managing PCW in accordance with the requirements of FAC 62-740.

The facility filed an annual report with the Department for used oil and used oil filters transported in 1998 before the March 1, 1999 deadline.

Spent mercury-containing lamps/devices are directly transported by ERS from the generator to Recyclights, Inc. for recycling.

There were two 55-gallon drums of used oil and one 55-gallon drum of used oil filters staged in the warehouse at the time of inspection. All of the drums were closed and properly labeled. According to Mr. Smith, this sort of material is transported off-site within 2-3 days for proper disposal or recycling.

Oily booms, pads and other oil contaminated materials are accumulated in the warehouse stored in plastic bins and/or liners located on the interior concrete floor. They are sent as needed to either Broadhurst Landfill or Geowaste of Valdosta, Georgia for proper disposal. Contaminated rags generated at the work site are accumulated in a closed bin at the warehouse and are sent as needed to Industrial Services of Plant City, Florida for cleaning. There were no containers of hazardous waste in the warehouse at the time of inspection. According to Mr. Smith, the facility itself does not generate hazardous waste.

The facility does generate approximately 10 gallons per month of used oil from equipment maintenance, which are collected in closed and labeled 55-gallon drums and sent to IWS for recycling as needed.

A review of the facility's operating records revealed that the facility has the required hazardous waste, used oil, and used oil filter transporter registrations and has submitted demonstration of financial responsibility to the Department, pursuant to FAC 62-730.170(2). A review of the facility's manifest records revealed that all manifests examined were in order.

No violations of applicable regulations were noted at the time of inspection in the areas inspected.


Richard Sykes
Environmental Specialist


Vicky G. Valade
Environmental Manager


Ashwin B. Patel
Hazardous Waste Supervisor

TRANSPORTERS CHECKLIST

1. Site Name: ERS (ENVIRONMENTAL REMEDIATION SERVICES)

Transporter Requirements (40 CFR 263)

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

Do the manifests contain at least:

- a. Name, address, and EPA ID of transporter? Y N
 - b. Name, address, and EPA ID code of generator? Y N
 - c. Name, address, identification code of designated permitted facility? Y N
 - d. Corresponding manifest document number? Y N
 - e. Description and quantity of each hazardous waste? Y N
 - f. Signature of subsequent transporters? Y N
 - g. Signatures signifying proper delivery or reasons why delivery could not be certified? Y N
 - h. EPA waste-codes? Y N
4. International shipments: (263.20(g)) NA
- 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
 - b. Is following information recorded on a shipping paper:

Facility: _____
Date: _____

- Name, address, and EPA ID of waste generator Y N/A 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 N/A
- a. Is the hazardous waste packaged according to 262.30? (263.12) Y _____ N _____
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 _____

*NOT OPERATING AS
TRANSFER FACILITY*

N/A

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

N/A
Y N
Y N

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

Y N

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

Y N
Y N

(3) Does training include:

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

Y N
Y N
Y N

(4) How often is training reviewed? _____

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

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

Y N
Y N

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

Y N

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

Y 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 N

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

Y 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

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 N
Y N

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

Y N

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

Y N

Is this equipment tested to assure its proper operation?

Y N

How frequently? _____ *MA*

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

(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 _____ 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 _____ 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 _____

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 _____ N _____

Are they readily available to the emergency coordinator? Y _____ 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 _____ 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 _____

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 _____ N _____

- b. Is it maintained at the facility? (265.53 - Copies of Contingency Plan) Y ___ N ___ N/A
- c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan) Y ___ N ___
- (1) Does the plan include:
- (a) Action personnel will take? Y ___ N ___
- (b) Evacuation routes? Y ___ N ___
- (c) Emergency Equipment? Y ___ N ___
- (d) Is the emergency equipment properly inspected and maintained? Y ___ 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 ___ N ___
- e. Who is the emergency coordinator? _____
- 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 ___ N ___
- g. Has the facility supplied DEP with a copy of the Contingency Plan? (62-730.171(2)(a)) Y ___ 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 ___ N ___
- 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 ___ 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 ___
- If yes, explain using narrative.
- e. Are each of the containers inspected at least weekly (265.174)? Y ___ 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 ___ N ___
- If yes, explain using narrative.
- g. Are incompatible wastes stored in the same containers? Y ___ N ___

If yes, explain using narrative.

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

Y N

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

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

Y N

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 N

Does the log contain:

Generators' names?

Y N

Manifest numbers?

Y N

Dates when waste enters and leaves facility?

Y N

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

Y N

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

Y N

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

NA

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 _____

If yes, complete the Generator checklist.

Land Disposal Restrictions

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

Y 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: ERS (ENVIRONMENTAL REMEDIATION) Date: 9/27/99
Facility Representative: JAYSON SMITH Facility ID #: FCD 984 261 4/2
Inspector: SYKES Registration #: 14759 sre#

40 CFR 279 Subpart E -- Transporter Standards

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 ___

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 ✓ Y ___ N ___

If not, has the transporter conducted a hazardous waste determination? (279.10(e)) N/A ✓ Y ___ N ___

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

6. Does the transporter comply with DOT requirements? (279.43(b)) Y ✓ 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? N/A Y ___ N ___

Report to DOT in writing per 49 CFR 171.16?

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 ___

Closed or otherwise protected from weather? Y ✓ N ___

Labeled "Used Oil Filters"? Y ✓ N ___

Stored on an oil impervious surface? Y ✓ 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 N
- 2. Does the facility maintain training records? (62-710.600(2)(c)) Y N
- 3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d)) Y N
- 4. Is the facility registration form and ID number displayed? (62-710.500) Y 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 N
- 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 N

- 1. Do used oil acceptance records include: (279.46(a))
 - Name & Address of facility providing the oil for transport? Y N
 - EPA ID # of oil provider (if applicable)? Y N
 - Quantity of oil shipped? Y N
 - Date of shipment? Y N
 - Signature of oil provider, dated upon receipt? Y N
- 2. Do used oil delivery records include: (279.46(b))
 - Name & Address of receiving facility or transporter? Y N
 - EPA ID # of receiving facility or transporter? Y N
 - Quantity of oil delivered? Y N
 - Date of delivery? Y N
 - Signature of oil receiver, dated upon receipt? Y 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 N
- 4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1)) Y 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 N

Transporter Recordkeeping - 279.46

Facility: _____
 Date: _____

Facility: _____
Date: _____

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
Y N N/A
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 N
3. Is this done by testing?
Y N
4. Is this done by process knowledge? Describe basis in narrative.
Y N
5. Are test records or copies of records providing basis for determination kept for 3 years?
Y N
6. Have any analyses showed exceedances of the 1,000 ppm level?
Y N
7. If so, was the oil managed as hazardous waste?
Y N
8. If not, was the oil exempt? Describe in narrative.
Y N N/A
9. Is used oil stored only in tanks or containers? (Circle applicable units)
Y N
10. 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
11. Is secondary containment provided and adequate?
Y N
12. Are containers, and tank trailers in good condition and not leaking?
Y N
13. Are containers provided with secondary containment consisting of walls and floor at a minimum?
Y N
14. Is the containment system impervious to oil so as to prevent migration?
Y N
15. Are ASTs, UST tank fill lines and containers labeled "used oil"?
Y N
16. Are used oil filters stored more than 10 days?
Y N
17. If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A
18. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?
Y N