



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Bay Line Railroad LLC

On-Site Inspection Start Date: 09/26/2011

On-Site Inspection End Date: 09/26/2011

ME ID#: 56074

EPA ID#: FLD984229906

Facility Street Address: 1 Edwards Dr, Panama City, Florida 32405-6097

Contact Mailing Address: 2037 Industrial Drive, Panama City, Florida 32405

County Name: Bay

Contact Phone: (850) 785-4609

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Complaint Inspection for Used Oil facility

Complaint Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Thomas Dillard, Inspector

Other Participants: Mark Sumner, Environmental Specialist II; Justin Gibson, Mechanical Supervisor; Donald Robey, Vice President Mechanical; Keith Chiles, Manager of Bay Line Locomotives; Rachel Heerman, Mechanical Department Purchasing

LATITUDE / LONGITUDE: Lat 30° 10' 58.1222" / Long 85° 38' 36.9654"

SIC CODE: 4011 - Trans. & utilities - railroads, line-haul operating

TYPE OF OWNERSHIP: Private

Introduction:

On 9-26-11, Department personnel inspected Genisse & Wyoming's Bay Line Railroad's (BLR) locomotive service facility at 1 Edwards Drive in Panama City in response to a complaint alleging mismanagement of wastes. The locomotive facility was last inspected on 8-17-06 at which time an in-compliance status was noted. The facility is registered as a CESQG generating less than 220 pounds per month of hazardous waste.

Process Description:

The following were observed or noted during the inspection:

In 2007 BLR started to do on-site painting of locomotives. BLR planned to paint twelve locomotives each year. Spray painting is done on 2nd shift and encompasses a three color paint scheme. BLR uses cloth rags for prep wipe up, then solvent containing. Spent solvent rags and gun washing wastes were said to be disposed of in BLR's refuse container for disposal to the local incinerator. Documentation of proper disposal of spray paint gun related wastes was not available for review. BLR uses MS251, a PPG Multi-purpose solvent, which when spent would carry hazardous waste codes for ignitability (D001), toluene (F005), and Acetone/Methanol (F003). Rags wet with this solvent when disposed of would carry the same waste codes. Rags used with this solvent would still be F005 hazardous waste, when disposed of, even if dry. BLR has added a second parts washer to the service area and these are now actively in use and being serviced by Safety Kleen and contain Premium Gold Solvent. One 55-gallon container of unused parts washer solvent from Crystal Clean (noted as non haz) was present in the paint shed and will be either returned or picked up by Safety Kleen.

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BLR is now utilizing an aerosol can puncture assembly with an attached drum for accumulation of evacuated waste paint liquids. A Department Guidance document for management of aerosol cans was given to BLR following the inspection. BLR intends to either accumulate Locomotive spray paint wastes in a separate container or transfer wastes to this common container attached to the puncturing device. Punctured cans are stored outside in the scrap metal container destined for a local metal dealer. No shipment of wastes from aerosols has been performed. Proper management options discussed with facility personnel to include current proper management of HW rags, alternative product substitution for solvent on rags or using contracted servicing of solvent bearing rags and ongoing hazardous waste management.

BLR stores used oil filters in a covered dumpster container inside the service facility that is protected from the weather. The container was labeled and inside the secondary containment provided by the building. BLR generates used oil from servicing locomotives and withdrawal operations mostly are done outside at a track station where hoses connect the pup to the locomotive oil sumps and pumps to the used oil tank in the nearby tank farm. Used oil tank was labeled, closed and in secondary containment exceeding requirement. Temporary transfer pans for small used oil jobs lacked labeling as required. BLR since 2006 has added a oil water separator which removes oil from storm water areas and from containment areas to the storage tank and water to the sewer lift station. In the outside paint shed a 5-gallon container of what looked like used oil was present without labeling or secondary containment.

BLR generates used oil, used oil filters and oil contaminated media (rags, oily water, oil dri and oil absorbent pads). Used oil and used oil filters are picked up by Aaron Oil (ALD983180233) and records were reviewed with no deficiencies noted. Used oil pickup has occurred twice so far in 2012 for a total of 6,371 gallons and an average per pickup of 2,125 gallons. Used oil filters are typically picked up every two weeks and seven shipping receipts were reviewed with no deficiencies noted. Crystal Clean (ILR000130062) serviced one System One parts washer twice in 2011. The manifest showed the solvent to be with an estimated generation rate of 19 pounds per month. Safety Kleen services two solvent parts washers that use Premium Gold Solvent (Flash Point 148 deg F).

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type: Violation
 Rule: 261.5(g)(3)
 Explanation: Generator failed to ensure that hazardous wastes (solvent laden rags and spent paint solvent) were properly managed and disposed.
 Corrective Action: Ensure proper management and disposal.

Type: Violation
 Rule: 262.11
 Explanation: Generator failed to identify that solvent laden rags and spent paint solvent wastes were hazardous waste.
 Corrective Action: Perform a proper hazardous waste determination on all wastes generated.

Type: Violation
 Rule: 62-710.401(6)

Inspection Date: 09/26/2011

Explanation: One five-gallon container of used oil in the paint shed was not labeled or within required secondary containment.

Corrective Action: BLR needs to manage used oil in compliance with Chapter 62-710.401(6) which states, "No person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil" and are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area."

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 261.5(g)(3)		09/26/2011	Generator failed to ensure that hazardous wastes (solvent laden rags and spent paint solvent) were properly managed and disposed.
262.11		09/26/2011	Generator failed to identify that solvent laden rags and spent paint solvent wastes were hazardous waste.
62-710.401(6)		09/26/2011	One five-gallon container of used oil in the paint shed was not labeled or within required secondary containment.

Areas of Concern

No Areas of Concern

ATTACHMENTS:

Used oil filter container



Old System 1 Parts washer

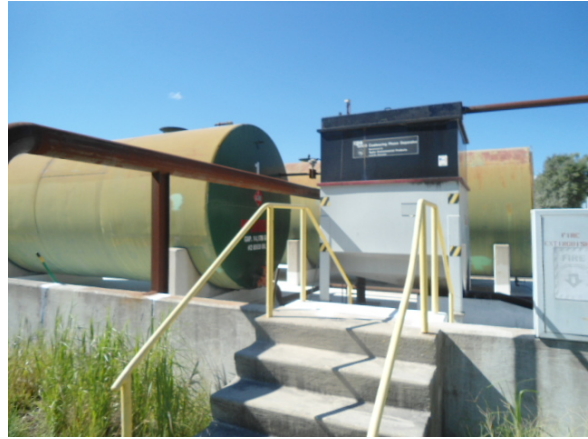


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New SK Parts washer



New separator & Used oil tank



Aerosol can puncturer



Used oil in paint shed



Conclusion:

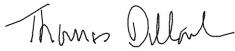
BLR needs to ensure that corrective actions are completed for the Potential Violations listed above.

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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.

Thomas Dillard PRINCIPAL INSPECTOR NAME	Inspector PRINCIPAL INSPECTOR TITLE
	
PRINCIPAL INSPECTOR SIGNATURE	FDEP ORGANIZATION
	10/27/2011 DATE
Mark Sumner INSPECTOR NAME	Environmental Specialist II INSPECTOR TITLE
NO SIGNATURE INSPECTOR SIGNATURE	FDEP ORGANIZATION
Justin Gibson REPRESENTATIVE NAME	Mechanical Supervisor REPRESENTATIVE TITLE
NO SIGNATURE REPRESENTATIVE SIGNATURE	GWRR ORGANIZATION
Donald Robey REPRESENTATIVE NAME	Vice President Mechanical REPRESENTATIVE TITLE
NO SIGNATURE REPRESENTATIVE SIGNATURE	GWRR ORGANIZATION
Keith Chiles REPRESENTATIVE NAME	Manager of Bay Line Locomotives REPRESENTATIVE TITLE
NO SIGNATURE REPRESENTATIVE SIGNATURE	GWRR ORGANIZATION

Inspection Date: 09/26/2011

Rachel Heerman

REPRESENTATIVE NAME

Mechanical Department Purchasing

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

GWRR

ORGANIZATION

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.