



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Clean Harbors Florida LLC
On-Site Inspection Start Date: 11/27/2012 **On-Site Inspection End Date:** 11/27/2012
ME ID#: 50782 **EPA ID#:** FLD980729610
Facility Street Address: 170 Bartow Municipal Arprt, Bartow, Florida 33830-9572
Contact Mailing Address: 170 Bartow Municipal Airport, Bartow, Florida 33830
County Name: Polk **Contact Phone:** (863) 519-6319

NOTIFIED AS:

LQG (>1000 kg/month)
Transporter
Transfer Facility
TSD Facility Unit Type(s)
Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Manager
Other Participants: John Bosek, Facility Manager; Parvez Mallick, Environmental Engineer

LATITUDE / LONGITUDE: Lat 27° 57' 20.2397" / Long 81° 46' 45.0001"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Municipal, Municipal

Introduction:

A joint USEPA/FDEP compliance inspection was conducted at Clean Harbors Florida for review of the facility's compliance with hazardous waste regulations. Parvez Mallick represented USEPA, and John Bosek represented the facility during the inspection. Clean Harbors' operations include hazardous waste transportation, storage and fuel blending. The company no longer reclaims solvent on site. The facility's renewed permit was issued on April 20, 2012. The facility was last inspected on September 6, 2012, and facility operations have not changed.

Process Description:

The facility was in compliance with its capacity limits and the types of waste being stored. Wastes staged for transfer were placed in authorized locations. Clean Harbors was holding a shipment of dry cleaning waste initially transported by MCF, manifested to Clean Harbors in Hebron, Ohio. No transfer waste had been held more than 10 days.

Aisle space and emergency equipment were also in compliance. One drum was noted to have a small amount of residue at the bung holes. This was corrected during the inspection. No open, unlabeled or leaking containers were found. One area of concern was noted with some containers that had been provided with pre-printed labels by Clean Harbors. An accumulation start date was printed on the label that implied that the generator had accumulated all the containers the same date. Clean Harbors was requested to review this apparent software issue. This space is normally left blank, and the date is written in by the generator, by hand.

The fluid containment trench in the south building was clean and dry. However, it was noted that the ledges supporting the metal trench covers did not appear to have been sealed in accordance

Inspection Date: 11/27/2012

with Appendix II-F.3 page 1 of 6 of the permit renewal application dated 2/14/11, as was the rest of the floor and sump. Clean Harbors was requested to seal these ledges in order to comply with Specific Condition I.2. of the permit. This was done after the inspection.

The company's fuel blending tanks and ancillary equipment had dried waste crusted on the outside and on the metal platform between the tanks. Failure to clean these spills up promptly is a violation of 40 CFR 265.31. Clean Harbors was requested to clean the equipment and was reminded that housekeeping practices in the area have been a continuing area of concern. The equipment was cleaned after the inspection.

No issues were noted with respect to compliance with Subpart BB and CC requirements. Valves, pumps and threaded connections were tagged and inspected in accordance with the permit. It was noted that flange 5018 was missing three bolts; no leaks were observed. Hazardous waste storage tank, container and facility inspections were also being performed in accordance with the permit.

The facility's laboratory held three satellite accumulation containers for flammable liquids, flammable solids and flammable corrosives. Each sample is bar coded with the same code as the parent container. Typically samples are not retained after testing except to resolve discrepancies. Only a few retained samples were on site, none older than 30 days.

During the record review it was noted that profile CH596378 for Window Man of South Florida, a non notifier, characterized the waste as a mixture of cupric nitrate, nitric acid, phosphoric acid and 3% selenous acid. The DOT shipping name for the material on the manifest was Waste Corrosive Liquid, acidic, inorganic, n.o.s (selenous and nitric acids). However the D010 code was not included on the manifest, profile or land disposal restriction notice. The shipping weight for the four containers was listed as 800 lb on the manifest, while the actual weight was 1,396 lb. In addition, the accumulation start dates on the containers indicated that the generator may not have been conditionally exempt. This issue was referred to the South District for further investigation. Clean Harbors was requested to investigate this discrepancy and potential training issue with the company's profiling group in Massachusetts. Annual training for facility staff was conducted on several dates in November.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	264.16(a)(1)
Explanation:	Facility staff accepted a shipment of hazardous waste on Manifest 005539690FLE from Window Man of South Florida without recognizing that the USDOT shipping description of the waste did not match the waste profile or land disposal restriction notice. (Corrected)
Corrective Action:	The profile was corrected, and this information was brought to the attention of Corporate staff responsible for reviewing and approving profiles.

Type:	Violation
Rule:	264.31
Explanation:	Residues of dried hazardous waste were observed on and adjacent to the fuel blending tanks and equipment. (Corrected)
Corrective Action:	Ensure that hazardous waste splashed by the facility's fuel blending equipment are routinely cleaned up at the end of the shift. Dried waste should be cleaned up regularly.

Inspection Date: 11/27/2012

Areas of Concern

Type: Area Of Concern

Rule: 403.727(1)(c)

Explanation: The ledges supporting the metal covers to the fluid containment trench in the south building did not appear to have a sealant coating as specified on page 1 of 6 of Appendix II-F.3 of the permit renewal application dated 2/14/11. This is a violation of Specific Condition I.2. of the permit. (Corrected)

Corrective Action: Sealant should be applied to all parts of the floor of the storage buildings as specified in the permit application. Worn sealant must be renewed as necessary to maintain an impervious floor surface.

Conclusion:

Clean Harbors was found to be out of compliance with hazardous waste regulations, but returned to compliance shortly after this inspection.

Inspection Date: 11/27/2012

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.

Elizabeth Knauss <hr/> PRINCIPAL INSPECTOR NAME	Environmental Manager <hr/> PRINCIPAL INSPECTOR TITLE
 <i>Beth Knauss</i> <hr/> PRINCIPAL INSPECTOR SIGNATURE	FDEP - SWD <hr/> ORGANIZATION
	1/16/2013 <hr/> DATE

Supervisor: Erin DiBacco

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.