



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
7777 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 18, 2013

SENT VIA EMAIL

greynolds@wrijax.com

Mr. Gregory Reynolds, Vice President and General Manager
Water Recovery, LLC
1819 Albert Street
Jacksonville, Florida 32202

Re: Water Recovery, LLC
EPA/DEP ID: FLR 000 069 062
Duval County – Hazardous Waste

Dear Mr. Reynolds:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection at your facility on September 26, 2012. 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 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 904.256.1671.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section

VB

Enclosure(s)



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Water Recovery LLC

On-Site Inspection Start Date: 09/26/2012

On-Site Inspection End Date: 09/26/2012

ME ID#: 36081

EPA ID#: FLR000069062

Facility Street Address: 1819 Albert St, Jacksonville, Florida 32202-1103

Contact Mailing Address: 1819 Albert St, Jacksonville, Florida 32202-1103

County Name: Duval

Contact Phone: (904) 475-9320

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Generator facility

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

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Gregory Reynolds, VP & GM

LATITUDE / LONGITUDE: Lat 30° 19' 35.9975" / Long 81° 37' 52.9911"

SIC CODE: 2992 - Manufacturing - lubricating oils and greases

TYPE OF OWNERSHIP: Private

Introduction:

Water Recovery, LLC (WR) was inspected by the Department of Environmental Protection's (DEP) Hazardous Waste Section on September 26, 2012, as an unannounced hazardous waste compliance evaluation inspection. WR is an industrial wastewater pre-treatment facility, a used oil processor (Permit number 79677-HO-07), used oil transporter and transfer facility, and marketer, used oil filter transporter and transfer facility, and filter processor. The facility was most recently inspected on September 2, 2010.

The facility consists of a main office, a laboratory, a maintenance shed, a container storage area, a used oil processing area, a wastewater processing area, and a solids/sludge/residues management area. Mr. Greg Reynolds, Vice President/General Manager, was present throughout the inspection.

Process Description:

WR treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. WR also receives leachate water from solid waste landfills. Incoming wastewaters are separated by type. Used oil, oily wastewaters and petroleum-contact water (PCW) are piped to the "black side" of the facility, which includes black tanks the facility uses in its used oil processing operations. All other wastewaters are piped to the "green side" of the facility, which uses green tanks.

Incoming oily wastewater, used oil, and PCW are treated by gravity separation and/or by dissolved

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air flotation. The waste is then chemically treated to adjust the pH in order to induce coagulation and flocculation. The wastewater fraction receives further treatment and processing, and it is then discharged to JEA. The solids, sludges, and residues generated from the facility's activities are de-watered, loaded into roll-off containers, analyzed, and then disposed at an appropriate disposal facility. Waste analysis records indicate that the solids are typically non-hazardous solid waste.

Pursuant to WR's used oil processor permit, all incoming shipments of used oil and PCW require a pre-approved waste profile before arriving at the facility. Upon arrival, the incoming material is sampled and compared to the fingerprint analysis for total organic halogen compounds (TOX), pH, flashpoint, and general physical appearance prior to final acceptance and off-loading. Oily wastewater is handled in the same manner; and, according to Mr. Reynolds, any water that has a visible sheen will also be screened for halogens.

Laboratory operations generate small amounts of hazardous waste solvents from analytical testing. The waste solvents (designated as D001/D002/D030/F003/F005 hazardous waste) are collected in a closed, labeled satellite container within the lab. According to the lab technician, WR generates about two 5-gallon buckets of this waste stream per year.

All of the facility's used oil processing tanks were properly labeled. The used oil output area has additional secondary containment to capture any leaks from off-loading. This containment was approximately half full of used oil. This is an area of concern.

WR does not process used oil filters on-site. At the time of the inspection, there was one 55-gallon drum of used oil filters on-site.

Record Review

Incoming PCW manifests showed that one shipment (manifest # 04262012) was missing WR's EPA ID number. This is an area of concern. The facility should have its EPA ID number on all incoming and outgoing used oil and PCW manifests. All other incoming manifests that were reviewed appeared to be in order.

In May 2012, the facility sold its recovered used oil to FCC Environmental (FLR000031393 - two shipments), Aaron Oil (ALD983180233 - two shipments), and Georgia Petroleum (GAD981222433 - two shipments). These outbound manifests had the proper EPA numbers, names, addresses, type/end used codes, and all applicable information required in Rule 62-710.510(1), FAC. Other outbound manifest appeared to be in order.

A review of the facility's remaining operating records, required inspections, financial assurance records, and incoming and outgoing analysis found them to be in order. During the review of the facility's inspection log it was noted the secondary containment in the southeast corner of the facility was damaged. Upon inspection of the damage it was noted that the top of the containment wall was cracked, but did not appear to adversely affect the ability to contain a spill. According to Mr. Reynolds, this is in the process of being bided out to a contractor for repair.

The facility's used oil registration that was on display had expired [62-710.500(4), FAC]. The facility did not have a copy of its current permit on-site and available for review [403.161(1)(b), FS, and Part 1, General Permit Condition 12].

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
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Rule: 403.161(1)(b)

Explanation: Part 1, General Permit Condition 12

The facility did not have a paper copy of the current used oil processing permit on-site.

Corrective Action: Subsequent to the inspection, the facility has a hard copy of its used oil processing permit on-site.

Type: Violation

Rule: 62-710.500(4)

Explanation: The facility's used oil registration that was on display was expired.

Corrective Action: The facility corrected this during the inspection.

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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.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

2/18/2013

DATE**Supervisor:** Jabe Breland III**Inspection Approval Date:** 02/18/2013

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.