



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

October 14, 2013

Mr. Bart Snow, President
Sun Coast Environmental, Inc.
405 Mealy Drive
Atlantic Beach, Florida 32233
bart@suncoastenv.com

Re: Sun Coast Environmental, Inc.
EPA/DEP ID: FLR 000 064 881
Duval County – Hazardous Waste

Dear Mr. Snow:

Department personnel conducted a compliance inspection of the above-referenced facility on September 20, 2013. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager
Northeast District

Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Sun Coast Environmental Inc

On-Site Inspection Start Date: 09/20/2013

On-Site Inspection End Date: 09/20/2013

ME ID#: 56934

EPA ID#: FLR000064881

Facility Street Address: 405 Mealy Dr, Atlantic Beach, Florida 32233-6945

Contact Mailing Address: 405 Mealy Dr, Atlantic Beach, Florida 32233-6945

County Name: Duval

Contact Phone: (904) 241-3111

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

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

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Bart Snow, President

LATITUDE / LONGITUDE: Lat 30° 20' 20.1243" / Long 81° 25' 6.4711"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Sun Coast Environmental, Inc. (Sun Coast) was inspected on September 20, 2013, as an unannounced hazardous waste compliance inspection by the Department's Hazardous Waste Section. Mr. Bart Snow, President, was present throughout the inspection.

Sun Coast is a registered used oil transporter. The facility has a contract with the US Navy to remove oily bilge water from surface ships berthed at Mayport Naval Station in Mayport, Florida. Sun Coast pumps bilge water from the ships using a pumper truck. The oily bilge water, described on shipping manifests as "oil/water emulsion," is delivered directly to Liquid Environmental Solutions (LES) by Sun Coast. LES is a registered used oil processor. Occasionally, Sun Coast contracts with LES to transport the oily water directly from Mayport to LES's location. The facility does not bring any used oil/oily bilge water back to the facility during transportation. At the time of the inspection, Sun Coast was only transporting oily bilge water for the US Navy. The facility has been in operation at its present location since 1999.

Sun Coast also has an EPA ID number as a contractor on Naval Station Mayport (FLR000200832). Its Naval Station Mayport location was not a part of this inspection.

Process Description:

Shop Area:

The Shop area stores chemical products, tools, equipment, and performs light maintenance work on company vehicles. Used oil is drained into a small catch pan, which was properly labeled. Used oil is then drained into a 55-gallon drum, which was properly labeled and on a containment pallet (Photo 1). Used oil filters are also collected in a properly labeled 55-gallon drum. Non-hazardous

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oily rags are collected in a 55-gallon drum. The facility does not operate a parts washer on-site.

The facility offers a water purifying service to Mayport carriers. Sun Coast brings four 2-vessel demineralizers (Photo 2) to Naval Station Mayport to purify the water. To regenerate the demineralizers, the facility brings back the vessels to its Mealy Drive facility and flushes the cation bed with HCl and the anion bed with NaOH. The two solutions are discharged into a large poly tank (Photo 3) to be mixed together and neutralized. According to Mr. Snow, the facility has received permission from the City of Atlantic Beach to discharge the waste saltwater into the sewer system.

The facility will also clean the insides of corrosion resistant steel pipes from the ship in its Shop Area. The facility uses a solution of hydrofluoric acid (1%) and nitric acid (10%) which is circulated through the pipe. The resulting waste water is reused on different pipes until it is spent, and it is then accumulated in a 55-gallon drum. This wastewater is neutralized on-site by using caustic soda. The facility has made the determination that this is a D002/D007 hazardous waste due to the chromium in the pipes. The facility is operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste and is allowed to treat this waste stream on-site.

At the time of the inspection, there was not a drum of this hazardous waste accumulating. The facility had a shipment on August 23, 2013, and has since not done any pipe cleaning. This D002/D007 hazardous waste is disposed of by Freehold Cartage.

Record Review:

At the time of the inspection, Sun Coast was operating as a CESQG of hazardous waste and a used oil generator. The facility generates between 5 and 10 gallons of D002/D007 hazardous waste per month. To maintain its status as a transporter of used oil, Sun Coast Environmental, Inc. annually verifies financial responsibility with the Department, pursuant to Rule 62-710.600, FAC for used oil transporters and carries liability insurance. The facility had its current used oil transporter certification posted at its facility.

Sun Coast Environmental, Inc. transports used oil using a manifest system that contains the information required by 40 Code of Federal Regulations (CFR) 279.46 and Section 62-710.510, FAC for used oil shipping papers. Used oil manifests are maintained on-site for a period of not less than three years. Halogen testing is being performed.

On several manifests from oily water generating from Naval Station Mayport, Sun Coast was using its Mealy Drive EPA ID number in the generator column. During the inspection, the facility changed its manifest template to reflect the correct generator EPA ID number. The facility also stated that its Naval Station Mayport EPA ID number would be placed on all future waste manifests generated at the Naval Base.

PHOTO ATTACHMENTS:

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Photo 1



Photo 2 - demineralization vessels



Photo 3



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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

10/9/2013

DATE

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.