



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** FCC Environmental LLC

**On-Site Inspection Start Date:** 01/22/2014

**On-Site Inspection End Date:** 01/22/2014

**ME ID#:** 28737

**EPA ID#:** FLD065680613

**Facility Street Address:** 105 S Alexander St, Plant City, Florida 33563-4833

**Contact Mailing Address:** 105 S Alexander St, Plant City, Florida 33563-4833

**County Name:** Hillsborough

**Contact Phone:** (813) 754-1504

**NOTIFIED AS:**

CESQG (<100 kg/month)

Transporter

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Elizabeth Knauss, Environmental Consultant

**Other Participants:** Angelo Pousa, Operations Manager; Nancy Gaskin, ENG II; Tony Piotrowski; Jason Bowers

**LATITUDE / LONGITUDE:** Lat 28° 0' 42.0089" / Long 82° 8' 24.5084"

**SIC CODE:** 2999 - Manufacturing - petroleum and coal products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A routine inspection was conducted at FCC Environmental to determine the facility's compliance with regard to used oil program and solid waste regulations. Angelo Pousa and other facility staff provided information and assistance during the inspection. The facility's operations have not changed significantly since the previous inspection. The used oil processing permit was renewed effective September 12, 2013. Registration and financial assurance information on file is up to date.

**Process Description:**

The facility receives used oil in tank trucks and occasionally by rail car. An XRF analyzer is used to check for halogen and sulfur content before the oil is unloaded into day tanks. Oil that contains more than 1,000 ppm halogens is held separately until the oil is either rejected or the generator has been able to rebut the presumption. The oil is held in the day tanks until a third party also lab verifies the material is not contaminated with PCBs. The oil is then transferred to a bulk storage tank pending processing. Processed oil is also tested by an outside certified laboratory to ensure it meets 40 CFR 279.11 specifications before it is sold as fuel, flotation oil or re-refinery feedstock. The oil is shipped off site by tanker and rail car as non-DOT regulated material. The company's process and specification testing ensures that the processed oil has a flash point above 200 degrees F.

FCC also checks incoming loads for flash point, water content and other parameters that affect their process. Flash points that exceeded 140 degrees F were not determined. A number of incoming loads with flash points below 140 degrees F were noted. These were due to mixtures of fuel and oil, and the oil acceptance records for these loads appeared to reflect the correct USDOT shipping information for the wastes.

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The company has completed transitioning to electronic system for tracking oil pickups. These automatically generate and print records in the field, and can capture the signature of the oil providers. The drivers can key in their halogen screening results, indicated as "pass" on the printout. The system is also set to automatically print USDOT shipping information based on the oil providers' statements regarding mixtures of oil and fuel.

In most cases, the company collects a retain sample from the oil provider, which is kept in case a contaminated load is detected using the XRF. The retained samples are analyzed only if necessary in order to rebut the presumption, or determine liability for a contaminated load. The samples are processed as used oil when no longer needed. The facility's records indicate that only a few issues have been detected since the previous inspection. In most cases, the presumption was rebutted due to contaminated by salt water, CESQG waste or public used oil collection center waste. A few loads were shown not to contain halogenated solvents by analysis.

Used oil filter processing operations were the same as in previous inspections. Four open drums of oil filters were awaiting processing outside the roofed area. Solids such as o-rings and other debris removed from the containment tray are drummed and then mixed with the facility's solid waste stream for disposal. Occasionally, filters are now sometimes shipped to Kellen Environmental for processing, if they are not shipped directly to the foundry. A number of cracks and worn areas were noted on the floor of the filter processing building. As this floor acts as secondary containment for the oil collection sump beneath the filter crusher, it must be maintained in good condition. Documentation of repairs was submitted after the inspection.

### **New Potential Violations and Areas of Concern:**

#### **Violations**

Type: Violation  
Rule: 62-710.850(5)(a)  
Explanation: Four used oil filter containers were open, and were not stored under a roof capable of protecting them from the weather. (Corrected)  
Corrective Action: Used oil filter containers must be closed or otherwise protected from the weather while awaiting processing.

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#### **Areas of Concern**

Type: Area Of Concern  
Rule: 62-710.401(6)  
Explanation: The concrete floor under the used oil filter processing equipment had a number of cracks and areas where the sealant did not appear to be in good repair. (Corrected)  
Corrective Action: Ensure that the used oil filter processing area floor is maintained in good repair, and that cracks are promptly repaired and sealed.

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**Conclusion:**

FCC Environmental Services has returned to compliance with used oil and oil filter management regulations.

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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.

Elizabeth Knauss  
**PRINCIPAL INSPECTOR NAME**

Environmental Consultant  
**PRINCIPAL INSPECTOR TITLE**

*E. Knauss*  
**PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD  
**ORGANIZATION**

2/4/2014  
**DATE**

**Supervisor:** Sean McGinnis

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.