



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Freehold Cartage Inc

**On-Site Inspection Start Date:** 01/23/2015      **On-Site Inspection End Date:** 01/23/2015

**ME ID#:** 16638      **EPA ID#:** FLD984187831

**Facility Street Address:** 175 Bartow Municipal Arprt, Bartow, Florida 33830-9576

**Contact Mailing Address:** P O Box 5010, Freehold, New Jersey 07728

**County Name:** Polk      **Contact Phone:** (732) 462-1001

**NOTIFIED AS:**

SQG (100-1000 kg/month)

Transporter

Transfer Facility

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transfer Facility

Routine Inspection for Hazardous Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: Elizabeth Knauss, Environmental Consultant; Michael Hirst

**LATITUDE / LONGITUDE:** Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

**SIC CODE:** 4212 - Trans. & utilities - local trucking, without storage

**TYPE OF OWNERSHIP:** Municipal

**Introduction:**

Freehold Cartage, Inc. (FCI) was inspected on January 23, 2015, to determine the facility's compliance with state and federal hazardous waste regulations. This facility was last inspected by the Department's Hazardous Waste Program in April 2013.

**Process Description:**

FCI is a registered Hazardous Waste, Used Oil, Used Oil Filter and Universal Waste Transporter and Transfer Facility. Operations have not changed since the previous inspection. The facility does not often transport used oil. FCI screens all drums of used oil with Dexsil Clor-Detect kits. Hazardous waste containers are stored up to 10 days within two storage trailers that are not utilized for transport which are located at the loading dock. The facility's emergency equipment, Contingency Plan, training records, transfer log, closure plan and manifests were reviewed during the inspection.

One drum was observed to be leaking in one of the transport trailers. The trailer is considered to be in transit. The drum was inspected by facility personnel and over-packed following the inspection. A few other drums were observed in the transport trailers in poor shape. A few of the drums were covered in paint or hardened resin and a few had large dents. The Department recommends taking more care in accepting drums in poor condition for transport. One drum was labeled with a

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"Hazardous Waste" label, however it discovered that the material was virgin methylene chloride and not waste.

As indicated in previous inspection reports, recordkeeping is poor as several containers appeared to have been stored for greater than 10 days, however it appears there have been data entry or computer errors that show containers to be onsite after they have left the facility.

FCI is planning to expand their transfer loading dock and the paved storage area. Construction has not yet commenced.

On December 24, 2014, FCI notified the Department of a manifest discrepancy. On August 7, 2014, one drum of hazardous waste was transferred to and accepted by Transporter #2 Freehold Cartage, Inc., Bartow, for transportation to Perma-Fix, Gainesville. On August 14, 2014, FCI made a delivery to Perma-Fix, Gainesville, that included this drum along with other waste containers and manifests, however the FCI driver failed to obtain a signature for the manifest this particular manifest. Approximately 30 days later, FCI received an inquiry regarding the disposition of this drum and began their investigation. They have not yet been able to locate the drum.

While investigating this issue, the Department requested copies of the other manifests that accompanied this particular one to Perma-Fix. One of the manifests submitted to the Department also contained a violation. This other manifest did not have the Generator's signature.

FCI is continuing to locate the drum and as a corrective measure conducted training for the drivers and staff at the Bartow office. This training was conducted on January 24, 2015. This training included more training on manifesting requirements. The company also has an incentive based program that rewards drivers with few compliance issues.

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

##### **Violations**

Type:	Violation
Rule:	263.20(a)(1)
Explanation:	On August 5, 2014, FCI failed to obtain the Generator's (KAF-TECH) signature on a uniform hazardous waste manifest (006559414 FLE).
Corrective Action:	FCI conducted training on January 24, 2015, to their drivers that included a section on manifesting requirements.

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Type:	Violation
Rule:	263.20(d)(1)
Explanation:	On August 14, 2014, FCI failed to obtain the signature of the destination facility (Perma-Fix, Gainesville) on a hazardous waste manifest (012951177 JJK).
Corrective Action:	On January 24, 2015, FCI conducted training for the drivers that included manifesting requirements.

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#### **Conclusion:**

At the time of the inspection, Freehold Cartage, Inc. was not operating in compliance with state and federal hazardous waste regulations. FCI self-disclosed the violations and returned to compliance.

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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.

Shannon D. Camp  
PRINCIPAL INSPECTOR NAME

Inspector  
PRINCIPAL INSPECTOR TITLE

**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.