



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

February 5, 2015

Mr. John Anderson, Vice President
Environmental Remediation Services Inc.
760 Talleyrand Avenue
Jacksonville, Florida 32202
j.anderson@ersfl.com

**Re: Environmental Remediation Services Inc.
EPA/DEP ID: FLR 984 261 415
Duval County – Hazardous Waste**

Dear Mr. Anderson:

The Florida Department of Environmental Protection (DEP) personnel conducted a compliance inspection of the above-referenced facility on January 14, 2015. 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. Non-compliance identified in the inspection report has been corrected.

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 email at jabe.breland@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jabe Breland'.

Environmental Manager

VC/jb/aw

Attachment



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Environmental Remediation Services
On-Site Inspection Start Date: 01/14/2015 **On-Site Inspection End Date:** 01/14/2015
ME ID#: 37410 **EPA ID#:** FLD984261412
Facility Street Address: 760 Talleyrand Ave, Jacksonville, Florida 32202-1031
Contact Mailing Address: 760 Talleyrand Ave, Jacksonville, Florida 32202-1031
County Name: Duval **Contact Phone:** (904) 791-9992

NOTIFIED AS:

Non-Handler
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for Non-Handler facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Universal Waste Transporter facility
Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector
Other Participants: Stuart Bartlett, Inspector; John Anderson, Vice President; Vince Clark, Compliance Manager

LATITUDE / LONGITUDE: Lat 30° 19' 47.5826" / Long 81° 37' 55.1331"

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

TYPE OF OWNERSHIP: Private

Introduction:

Environmental Remediation Services (ERS) was inspected on January 14, 2015, as an unannounced hazardous waste compliance evaluation inspection. The facility was last inspected on February 8, 2011, when it was in operation as a hazardous waste transporter, used oil transporter, used oil filter transporter, and a petroleum contact water transporter. ERS is still performing those activities and is also appropriately registered for those activities. The facility has been assigned the EPA ID number FLD 984 261 412. Please use this number on all hazardous waste manifests and on used oil transportation records, as well as on all correspondence with the DEP.

ERS has been in operation at this location for 14 years and has 16 employees. ERS is an environmental contractor that offers emergency spill response, site remediation, aggressive fluid vapor recovery, industrial cleaning, transportation, and waste management services. The facility has four vacuum trucks, one bed truck for drums, and three bed trucks for use at job sites. The facility consists of a storage area, containment area, and offices. The facility is connected to the city sewer. Mr. John Anderson, Vice President/Operations, was present during the inspection.

Process Description:

Hazardous Waste Transportation

According to Mr. Anderson, the facility rarely transports hazardous waste, but maintains its registration in case the opportunity arises. The facility mainly brokers out hazardous waste

Inspection Date: 01/14/2015

transportation jobs to other companies. Mr. Anderson stated that, when ERS does transport hazardous waste, it is never brought back to the facility, but it is taken straight to the receiving facility.

In 2014, the facility transported hazardous waste on only eight occasions. The shipments were either delivered to Perma-Fix in Gainesville (FLD980711071) or EQ in Tampa (FLD981932494). No discrepancies were observed with the manifests. Two vehicles were inspected and both contained the current hazardous waste transporter registration.

Used Oil and Used Oil Filter Transportation

Mr. Anderson stated that the facility mainly transports oily wastewater generated from tank cleanings, but that ERS does transport some used oil as well. Any oily wastewater or used oil that ERS transports is taken directly to Liquid Environmental Solutions (LES) (FLD981928484) or another receiving facility for processing. The facility transported five loads of used oil in 2014. One used oil shipment (manifest #14132) dated 3.13.14 did not contain the results of halogen screening [40 CFR 279.44(d) and Rule 62-710.510(1)(g), FAC]. ERS also maintains a used oil tracking log on DEP Form 62-710.901(2), which was submitted for review after the inspection. According to Mr. Anderson, used oil filter transportation is rare. No transportation records for used oil filters were observed during the record review.

Used oil training appeared to be adequate and complete. The required insurance was being maintained by the facility. ERS had the used oil transporter registration displayed in a prominent place at the facility, and the facility submits the required used oil annual report by March 1 of each year.

Storage Area

This area is used mainly for storing equipment inside the facility. No vehicle maintenance is performed on-site.

Containment Area

This area is located outside the facility adjacent to the parking lot. Non-hazardous wastes are sometimes placed in this area short term until they can be taken to a disposal facility. At the time of the inspection, there were two totes of oily water on-site. These containers were dated 12.11.14. This is an Area of Concern. The facility was reminded that if used oil is stored on-site for longer than 24 hours, the facility would be subject to the used oil transfer facility requirements in 40 CFR 279.45. The facility would also become a hazardous waste transfer facility if hazardous waste was stored on-site for longer than 24 hours.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.510
Explanation:	62-710.510(1)(g) - The facility did not include the results of used oil halogen screening on manifest number 14132 dated 3.13.14.
Corrective Action:	The facility submitted documentation to the DEP on 1.15.15, returning to compliance. No further action is necessary.

Inspection Date: 01/14/2015

Inspection Date: 01/14/2015

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

2/3/2015

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.