



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

March 17, 2016

Mr. Shawn Northcraft, Service Manager
Flagler Construction Equipment
8750 Philips Highway
Jacksonville, Florida 32256
snorthcraft@flaglerce.com

**Re: Flagler Construction Equipment
EPA/DEP ID: FLR 000 213 694
Duval County – Hazardous Waste**

Dear Mr. Northcraft:

Department personnel conducted a compliance inspection of the above-referenced facility on December 3, 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 Heather Hahn at (904) 256-1675 or via email at heather.hahn@dep.state.fl.us.

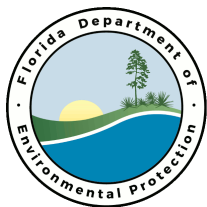
Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner
Environmental Manager
Compliance Assurance Program

MK/hh/aw

Attachment



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

FACILITY INFORMATION:

Facility Name: Flagler Construction Equipment

On-Site Inspection Start Date: 12/03/2015

On-Site Inspection End Date: 12/03/2015

ME ID#: 114929

EPA ID#: FLR000213694

Facility Street Address: 8750 Philips Hwy, Jacksonville, Florida 32256-8215

Contact Mailing Address: 8750 Phillips Highway, Jacksonville, Florida 32256

County Name: Duval

Contact Phone: (904) 737-6000

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Heather M. Hahn, Inspector

Other Participants: Shawn Northcraft, Service Manager

LATITUDE / LONGITUDE: Lat 30° 12' 29.6244" / Long 81° 34' 42.6828"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Flagler Construction Equipment (FCE) was inspected on December 3, 2015, as an unannounced hazardous waste compliance inspection. The facility has not been previously inspected by the Department's hazardous waste program. The facility notified as a Conditionally Exempt Small Quantity Generator (CESQG) and a Used Oil Transporter (UOT) in March of 2015. The facility is currently operating as a CESQG, used oil and used oil filter transporter. The facility has been given the EPA/DEP identification number FLR 000 213 694. Please use this number on all hazardous waste related correspondence with the Department.

FCE services engines, generators, and transmissions for industrial equipment and vehicles. Work is done both in the field and on-site.

Process Description:

Service Center

FCE services forklifts, vehicles, and various other heavy equipment in the service area. Used oil, used oil filters, spent antifreeze, and oily absorbent are generated in the service center. Used oil is drained into mobile used oil carts located throughout the shop. All the carts were labeled. Drained used oil is accumulated in a double-walled 200-gallon tank. The tank was labeled and in good condition. Used oil filters and oily absorbents are accumulated in 55-gallon drums located inside the service building. Spent antifreeze is accumulated in a 250-gallon polyurethane tote. All of the drums and containers were closed and labeled.

Inspection Date: 12/03/2015

One 55-gallon drum of waste paint and spent lacquer thinner was located in the service area. The paint is from a process that is no longer performed by the facility. In a March 10, 2016, e-mail, the facility provided documentation that the drum of waste paint/lacquer thinner was handled by Heritage Crystal Clean as D001/F003/F005 hazardous waste.

Vehicle batteries are exchanged through Battery Distributors. Aerosol cans are used until completely empty before being disposed of as solid waste.

Rags are accumulated in step cans located throughout the facility. Rags are laundered through GnK as non-hazardous oily rags. The facility uses Volvo Brake Cleaner (containing 30-60% acetone and 5-10% ethylbenzene) for cleaning. No hazardous waste aerosols or solvents were noted at the time of the inspection. However, if the facility starts using aerosols or solvents that would become hazardous waste the facility would be eligible for the "Excluded Solvent Contaminated Wipes" exclusion. Please see the following website or contact the inspector for more information about the terms of the exclusion:
http://www.dep.state.fl.us/waste/quick_topics/publications/shw/HWRegulation/MgmtPracticesWipesRags_31Jan14.pdf.

Wash Rack

FCE washes vehicles in a wash rack located outside the service area. Dirt and debris from the wash rack accumulates in a trench along the side of the wash rack. The facility collects the dirt and debris into 55-gallon drums. The drums are handled as non-hazardous oily waste.

Used Oil Transportation

The facility services lift trucks in the field and then transports the used oil generated from that operation back to its facility. The facility has one lube truck with two 100-gallon tanks. The used oil generated in the field is added to the facility's used oil tank. FCE transports only used oil generated at its own non-contiguous operations to its own collection facility for storage prior to having it picked up by a certified used oil/used oil filter transporter. The facility is required to comply with all of the used oil transporter requirements, including annually registering its used oil transportation activities with the Department, complying with used oil transporter certification requirements, and maintaining proof of financial responsibility [Rule 62-710.600(2)(e), FAC]. The facility was in compliance with these requirements.

Records

Heritage Crystal Clean recycles the majority of the facility's used oil, as well as the facility's oily absorbents. Non-hazardous dirt and debris generated from the wash rack is also handled by Heritage Crystal Clean. Howco recycles the facility's used oil filters and occasionally handles the facility's used oil.

Heritage Crystal Clean services the facility's two parts washers (30-gallons total) as non-hazardous aqueous waste.

The facility is currently operating as a CESQG of hazardous waste and a transporter of used oil and used oil filters. The facility has not had to dispose of aerosol waste generated at this location. The facility keeps records of disposal on-site for a minimum of three years.

At the time of the inspection the facility did not have adequate training records on-site [62-710.600(2)(c), FAC]. In a March 10, 2016, e-mail, the facility provided documentation of employee training.

Inspection Date: 12/03/2015

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	The facility was not able to provide records of training at the time of the inspection.
Corrective Action:	No further action is required. In a March 10, 2016, e-mail, the facility provided documentation of training. Training records should be maintained on-site by the facility for a minimum of three years.

Inspection Date: 12/03/2015

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.

Heather M. Hahn**PRINCIPAL INSPECTOR NAME**Inspector**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**3/10/2016**DATE****Supervisor:** Heather Hahn**Inspection Approval Date:** 03/10/2016

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.