



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

June 28, 2016

Tony Piotrowski, Fields Services Supervisor
Heritage Crystal-Clean LLC
105 S Alexander St
Plant City, FL 33563
Tony.Piotrowski@Crystal-Clean.com

Re: Heritage Crystal-Clean LLC
Facility ID. FLD065680613
Hillsborough County

Dear Mr. Piotrowski:

Department personnel conducted a compliance inspection of the above-referenced facility on May 20, 2016. Based on the information provided during the inspection, the facility was determined to be in compliance. 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 Kelly Honey at (813) 470-5786, or via e-mail at: Kelly.Honey@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Vaughn".

Rick Vaughn
Environmental Manager
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

Enclosures: Inspection Report

ec: Scott Crandall, HCC Director of EH&S, Scott.Crandall@Crystal-Clean.com
Angelo Pousa, HCC Regional Manager East Coast Operations,
Angelo.Pousa@Crystal-Clean.com
Gerry Javier, EPC-SQG Manager, javier@epchc.org
SWD_Clerical@dep.state.fl.us



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

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC

On-Site Inspection Start Date: 05/20/2016

On-Site Inspection End Date: 05/20/2016

ME ID#: 28737

EPA ID#: FLD065680613

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

Contact Mailing Address: 6305 E Lombard St, Baltimore, Maryland 21224-1734

County Name: Hillsborough

Contact Phone: (410) 284-1717

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Tony Piotrowski, Field Services Supervisor; Angelo Pousa, Regional Manager East Coast Operations

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:

Heritage Crystal-Clean, LLC, (Crystal-Clean) was inspected to determine its compliance its permit and with state and federal regulations governing used oil and hazardous waste. Crystal-Clean is a used oil transporter, processor and marketer of on-spec used oil operating under permit #30676-HO-007, which expires on August 20, 2018. Crystal-Clean produces a fuel oil that is equivalent to No. 5 Fuel Oil and an industrial oil for the phosphate industry. The Crystal-Clean site contains an oil re-refinery facility, laboratory, industrial wastewater pretreatment facility, storage tanks, maintenance garage and administration buildings. Little has changed at the facility since the previous inspection of January 22,2014, except as noted. The inspector was accompanied by Mr. Tony Piotrowski, the Field Services Supervisor and primary designated emergency coordinator, with additional assistance provided by Mr. Angelo Pousa, Regional Manager East Coast Operations.

Crystal-Clean acquired FCC Environmental Services, LLC, in 2015, and the permit was transferred via a Permit Minor Modification on May 20, 2015. The permit was modified again on October 26, 2015, to include revisions to the Waste Analysis Plan (WAP). Updated closing cost estimates were provided and approved by the Department in 2015. The facility's DOT PHMSA certification expires June 30, 2017. Since the previous inspection, Crystal-Clean has become a certified hazardous waste transporter, however, no hazardous waste is actually transported under this ID number. Additionally, the facility is no longer crushing used oil filters.

Inspection Date: 05/20/2016

Process Description:

The facility receives used oil in tank trucks and occasionally by rail car. Used anti-freeze is also picked up and shipped for recycling via rail car to a Crystal-Clean glycol distillation facility in Rockville, VA. In accordance with its approved WAP, used oil that is transported by Crystal-Clean is screened in the field using a Chlor-D-Tect test kit. Note that used oil from automotive sources is screened only upon the first pickup, and this practice has been approved by the RCRA Permitting Section. If the used oil is found to contain >1,000 ppm halogens, the oil will not be collected without direction and approval from Crystal-Clean's divisional oil and vacuum service manager. In addition to the field screening, at least one retain sample is obtained at each pick-up.

All incoming loads are screened for halogen content upon arrival using a Chlor-D-Tect test kit. Single source loads that fail the screening are kept segregated until the presumption is either rebutted or not. If it can't be rebutted, the load is rejected, and usually returned to the generator unless other arrangements are made. Loads of consolidated used oil that fail the halogen screening upon arrival are segregated and analyzed to characterize the waste. Each retain sample is then analyzed to determine which customer had the contaminated used oil. If the presumption can be rebutted based on who generated it (e.g., CESQG) it will be accepted. If not, the load is transported to a TSD, and the original generator signs the HW manifest. Segregation for loads received from a third party transporter are segregated by placing the material into a dedicated tank and are not released until additional screening is conducted and passed. Part of this screening is analysis by an outside NELAP certified lab to determine PCB contamination.

Samples retained by drivers are processed when no longer needed, or at least 90 days. Based on review of the non-conforming log, the facility has received nine nonconforming loads in 2016. In all cases, the presumption was rebutted. The last nonconforming load that was rejected was in 10-5-15 because of high levels of PCBs. This load was initially accepted from a third party transporter and kept segregated as part of the screening process described above before analytical results showed PCB contamination. At the time of this inspection, the load was still on site in a locked out AST (#7). Crystal-Clean has been attempting to determine the source of the contaminated oil, but is now making arrangements to transport the contaminated oil for disposal, most likely to Waste Management, Inc., in Emelle, AL. American Compliance Technologies, Bartow, FL, has already been contracted to clean and decontaminate the AST afterward. Information about PCB disposal (i.e., a link to EPA's PCB webpage) was provided to the facility after this inspection.

An XRF analyzer is used in the lab to check for halogen and sulfur content as part of the on-spec determination. The approved WAP does not indicate whether it is also used as part of the screening process. Processed oil is also tested by an outside certified laboratory to ensure it meets 40 CFR 279.11 specifications before it is sold as on-spec. Every batch of used oil sold to the phosphate industry is analyzed for on-spec parameters. Used oil destined for other usage is determined to be on-spec using the weekly composite samples allowed by permit. On-spec 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.

The company uses an 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.

As indicated, used oil filters are no longer crushed at the facility. The crusher is still on site, but there are plans to get rid of it. The entire crushing area was extremely clean. Filters are picked up in drums, transferred to a 4-yd³ hopper, and then placed into a 30-yd³ roll-off for transport to US Foundry in South Florida. Used oil filters are stored under a roof. At the time of the inspection, there were eight 4-yd³ containers and one roll-off storing filters. The roll-off container of used oil filters appeared to be protruding just slightly (i.e., <6-inches) from under the roof overhang. Please remind all drivers that the entire roll-off must be protected from the weather in accordance with Rule 62-710.850(5), FAC. Used oil filters are shipped off site approximately 5 times per month.

Inspection Date: 05/20/2016

Crystal-Clean picks up oily solid waste from its customers and generates its own, but is no longer processing solid waste. Oily solids generated by its customers are taken to Crystal-Clean's location in Tampa, FL, and from there on to Crystal-Clean's hub in Atlanta, GA. Mr. Piotrowski said he believed the majority was burned for energy recovery. Oily solids, such as spent clay absorbent, that are generated on site are accumulated in a roll-off for disposal at the Okeechobee Landfill. Oily solids, such as rags and contaminated paper, are accumulated in a compactor and disposed of at the MacKay Bay Waste-to-Energy Plant in Tampa, FL. The solids are analyzed at least once per year by PhosLab in Lakeland, FL, for metals and volatiles.

The remainder of the walk-through included both of the tank farms, the maintenance area, the yard, the oil/water separator and associated drain field, the processing/water treatment area, the lab, and the drum washing area. All tanks were observed to be appropriately labeled (e.g., used oil, petroleum contact water, etc.) and well maintained. A small amount of liquid was observed in the south tank farm, but it was raining during the inspection. The lab generates small amounts of hazardous COD waste and there is a small, closed and labeled container for accumulation. In addition, staff in the maintenance area are using Brakeleen brake cleaner containing perchloroethylene. As discussed during the inspection, any rags contaminated with this spent brake cleaner will have to be managed as either hazardous waste or under the solvent contaminated rag exclusion.

Records were reviewed and found to be complete. The contingency/SPCC plan was up to date, and emergency response arrangements have been made with local authorities. Training records were up to date. The facility's industrial wastewater pretreatment permit with the City of Plant City was current. Records of inspections of the facility, emergency equipment, tank systems and ancillary equipment, containments, yard, etc., were all current and in accordance with the permit requirements. Some used oil shipping records were reviewed, and the facility appears to be recording all required information. The manifest reviewed indicate that Crystal-Clean is transporting used oil under its Illinois EPA ID number (ILR000130062). The only issue noted was that the records of delivery did not always include the receiving facility's ID number. Discussions on site indicate that this is a programming issue and will be addressed.

Conclusion:

Based on the observations made during this inspection, the facility appears to be in compliance with its permit.

Inspection Date: 05/20/2016

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.

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

6/21/2016

DATE

Supervisor: Richard Vaughn

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.