



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

FACILITY INFORMATION:

Facility Name: FPL Area Office West

On-Site Inspection Start Date: 06/07/2016

On-Site Inspection End Date: 06/07/2016

ME ID#: 45323

EPA ID#: FLD000807420

Facility Street Address: 1177 N Lime Ave, Sarasota, Florida 34237-3513

Contact Mailing Address: 2455 Port West Blvd, Riviera Beach, Florida 33407-1214

County Name: Sarasota

Contact Phone: (561) 845-4973

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Karen R. Bayly, Environmental Consultant

Other Participants: Bob Stewart, Environmental Specialist; Andrew Daugherty, Sr Environmental Specialist

LATITUDE / LONGITUDE: Lat 27° 20' 51.3192" / Long 82° 31' 29.1356"

SIC CODE: 4911 - Trans. & utilities - electric services

TYPE OF OWNERSHIP: Private

Introduction:

A hazardous waste compliance evaluation inspection was conducted at this facility on June 7, 2016 to determine the facility's compliance status with state and federal hazardous waste and used oil regulations. A compliance assistance site visit was previously conducted at this facility by DEP hazardous waste staff on October 22, 2013. At that time it was determined that the facility was a non-handler of hazardous waste.

In October 2015, the facility provided DEP notification and registered as a used oil transporter, used oil transfer facility and conditionally exempt small quantity generator (CESQG) of hazardous waste. A CESQG generates less than 220 pounds of hazardous waste in a calendar month and never accumulates more than 1,000 kilograms (2,200 pounds) of hazardous waste; or 1 kilogram (2.2 pounds) of acutely toxic hazardous waste at any time.

According to DEP records, the facility's used oil transporter/transfer facility registration expires on 6/30/17.

According to the Sarasota Property Appraiser, Florida Power & Light Company (FPL) owns the property.

The physical inspection was conducted on June 7, 2016 however facility representatives were either unavailable due to Tropical Storm Colin and/or were on leave. We were granted permission and escorted throughout the inspection by Andrew Daugherty, FPL Senior Environmental Specialist on-call from another FPL facility. Follow-up information and documentation were provided subsequent to the inspection by Pam Shoosmith - facility Senior Environmental Specialist for FPL Area Office West (AOW).

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Process Description:

FPL generally maintains and repairs aerial and pad mounted transformers located throughout the service area. The facility subcontracts with SWS Environmental Services who is on call 24/7 to assist with oil response, management, and record keeping.

FPL Area Office West (AOW) primarily consists of office buildings and meeting rooms and does not normally generate hazardous waste. The facility is also a staging area for emergency stock transformers. According to Ms. Shoosmith there are no meters or repairs of equipment conducted at the facility. No spent fluorescent lamps were observed to be stored at the time of the inspection. Ms. Shoosmith indicated spent fluorescent lamps are removed by a facility maintenance vendor and delivered to the FPL Venice service center. The lamps are managed as universal waste until they are picked up by Ryder Integrated Logistics EPA ID# FLR000088377 (registered transporter of universal waste lamps) and transported to FPL's Regulated Materials Facility (RMF) in West Palm Beach. Shipping papers were provided subsequent to the inspection.

FPL transports its own used oil generated at its own non-contiguous operations to this facility (AOW) for storage prior to having the used oil picked up by a certified used oil transporter and is therefore not subject to the record keeping and reporting requirements of Rule 62-710.510, F.A.C. and is exempt from Rule 62-710.600 with the exception of financial responsibility requirements.

Non-PCB used mineral oil is picked up from eight other FPL service centers in the immediate area using a single transfer truck. At the time of the inspection, the truck was not at the facility. Ms. Shoosmith indicated the truck has a volume capacity of 1500 gallons. Used oil is off loaded into a 6000-gallon, double-walled, above ground storage tank the same day the used oil is picked up. Ms. Shoosmith indicated that used oil is never stored in the truck for >24 hours. The storage tank is labeled with the words 'used mineral oil', 'used oil', 'no smoking' and 'combustible'. The tank is registered ID# 9814811.

Ms. Shoosmith indicated that equipment that is not labeled as non-PCB is tested in the field to determine if PCBs are present. If the used oil is tested and fails, a sample is collected and sent to FPL's Physical Distribution Center (PDC) for further analysis before draining and pumping into the transfer truck. According to Mr. Daugherty, any oily debris or used mineral oil determined to contain >50 ppm PCBs is drummed and sent to FPL's PDC. All shipments are tracked on an internal shipping paper.

The following documentation was provided by Mr. Shoosmith following the inspection: training records for truck drivers, transporter used oil acceptance log, used oil disposal manifests, 2016 Statement of Self Insurance for Used Oil Transporter.

Transporter used oil acceptance logs and used oil disposal manifests were provided subsequent to the inspection. The acceptance logs document the date of used oil pick-up, quantity of used oil, the pickup location, the driver's signature, as well as the date, gallons and driver's signature of the used oil transferred to the used oil tank. The logs reflect that used oil is off-loaded daily into the storage tank.

Used oil disposal manifests indicate JAM Environmental & Vacuum Services, LLC (EPA ID#FLR000176842) picks up the facility's used oil monthly. Manifests indicate that halogen levels are tested and all passed. Records reflect that used oil is not stored on-site for >35 days.

Training records were reviewed and up to date.

At the time of the inspection, an open, orange 5-gallon bucket was noted beneath what appeared to be the fill port for the storage tank. The bucket contained oily waste. It was discussed with Ms. Shoosmith that the bucket should be maintained closed when not actively adding/removing oily waste and labeled with words identifying its contents. Various equipment and spill response equipment is maintained in storage areas adjacent to the storage tank. It was indicated by Mr. Daugherty that FPL utilizes a computerized compliance tracker to ensure tasks, inspections and work activities are conducted timely.

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PHOTO ATTACHMENTS:

used mineral oil storage tank



spill control equipment



Conclusion:

The open, orange 5-gallon bucket managing oily waste adjacent to the used oil storage tank should be maintained closed when not actively adding/removing oily waste and labeled with words identifying its contents.

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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.

Karen R. Bayly

PRINCIPAL INSPECTOR NAME

Environmental Consultant

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:** Karen Bayly

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.