



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

FACILITY INFORMATION:

Facility Name: Clean Harbors Florida LLC

On-Site Inspection Start Date: 03/22/2017 **On-Site Inspection End Date:** 03/22/2017

ME ID#: 50782 **EPA ID#:** FLD980729610

Facility Street Address: 7001 Kilo Ave, Bartow, FL 33830-6672

Contact Mailing Address: 170 Bartow Municipal Airport, Bartow, FL 33830

County Name: POLK

NOTIFIED AS:

LQG (>1000 kg/month)

TSD Facility

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for TSD Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Javier Garcia, ; Mike Neill, ; Marty Allen, ; John Bosek, General Manager; Wes McDuffie, Operations Manager

LATITUDE / LONGITUDE: Lat 27° 57' 20.2397" / Long 81° 46' 45.0001"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Municipal

Introduction:

A routine hazardous waste compliance inspection was conducted in conjunction with a USEPA air monitoring inspection at Clean Harbors' permitted hazardous waste storage facility located at the Bartow Municipal Airport. The facility permit, 642470HO-016 and 64247-SO015 was renewed effective October 5, 2016, with an expiration date of December 10, 2021. The facility recently applied to replace one of the permitted hazardous waste storage roll off containers with a portable explosives magazine, in order to hold waste consumer fireworks generated as a result of a contract with a major retail chain. The application is pending. The company also has an application pending with the Department's Solid Waste Section to modify the solid waste solidification tank. John Bosek and Wes McDuffie represented Clean Harbors during the inspection.

Process Description:

Clean Harbors has a tank farm with ten storage tanks with components regulated under 40 CFR 264 Subparts B and C. The company has ceased solvent reclamation activities, and therefore has no units regulated under 40 CFR 264 Subpart AA. The team from USEPA's Environmental Services Division in Athens, Georgia conducted emissions monitoring and a record review as a part of this inspection, and their findings will be covered in more detail under a separate USEPA inspection report. During their inspection, two tanks, T-101 and T-102 were found to have excess emissions. Gaskets were replaced on two valves, and inspection points 5001 and 5031 were re-checked on 3/23/17. Emissions were within permitted limits on the re-check. The facility uses a Sirius MSA 4000 photoionization detector for leak checks, and maintains calibration records on site.

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Both container storage buildings were under the permitted capacity limit, and the containers were properly labeled and marked. Containment sumps were clean and dry. The facility complies with the waste analysis plan and marks containers that do not conform with their profile as "OFFC" (off classification). The company attempts to resolve the discrepancy with the generator, but if it cannot be resolved within 15 days the material is rejected. During the inspection, a pallet of containers labeled as a non-RCRA material was found to contain a mixture of materials, including D002 Chem Crest 275 liquids and Chem Crest 14EZ. The material was profiled as a USDOT corrosive solid, Chem Crest 270. This material had been picked up by Clean Harbors on 3/20/2017 at Stryker (FLD984182576), and the discrepancy was not detected at the time the material was accepted for transport. The waste was received at the storage facility the same day, and the discrepancy had not yet been detected. The facility permit allows up to five working days after arrival to verify the container contents, so this was not considered a violation of Clean Harbors' permit. Clean Harbors files unmanifested waste reports if hazardous waste is received using a bill of lading rather than a manifest.

If samples are collected as part of the waste analysis plan checks, the samples are bar coded with the same code as the container and are transferred to the facility's lab. After the checks are complete, and it is determined that there is no need to retain a sample, they are discarded into one of three satellite accumulation containers, one for flammable liquids, one for solid debris and the last for mixed corrosives or toxics. The new provisions for satellite accumulation under the generator improvements rule (new 40 CFR 262.14) may affect how this area is managed in the future; it may be necessary to separate the containers or provide smaller containers to meet the 55 gallon limit per satellite accumulation area.

Containers of transfer waste were stored in designated areas, and none were found to have been held more than 10 days during the course of transfer. In order to prepare for off site container shipments, a pick list is selected depending on the designated facility, and the container bar codes are checked against the pick list when the container is staged for loading. Transfer waste and outgoing loads are staged in accordance with USDOT compatibility criteria prior to loading into semi trailers.

The container storage buildings were operated in accordance with their permits, except that an aisle space problem was noted in the reactivities bay. Access to inspect some of the containers was blocked, as pallets were not in position. This was corrected after the inspection. An issue was noted with a damaged cardboard box of universal waste lamps in the reactivities bay, and this was corrected during the inspection. An uncontainerized HID lamp was noted in a loose fixture on the ground outside the industrial services building, and this was also corrected during the inspection. A container of non hazardous waste that was stored on the floor rather than a pallet was moved on to a pallet during the inspection. A couple of containers were noted to have dried residue on the outside; corrective action usually involves overpacking containers with residue before they are picked up, or as they are received.

Fuel blending is conducted in accordance with the facility's permit. Most of these wastes are received by drum and then bulked, although some waste is received in bulk. After quality assurance checks conducted in accordance with the facility's waste analysis plan, the drums are placed into storage. Drums are picked for consolidation, staged within the south building and their bar codes are scanned to update the facility's operating record and confirm the drum identity. The contents are then pumped to one of the storage tanks. Solids that are not pumpable may have to be scraped from the drums. Empty drums are usually stored within a containment area adjacent to the tank farm. These are shipped to ICS in Zellwood for recycling. Drums that can't be reclaimed are cleaned and disposed of as scrap metal. Roll off containers were staged in accordance with the permit. The portable explosives magazine had been placed, but did not contain any waste at the time of the inspection.

The hazardous waste storage tanks have a cone bottom, and are not agitated. The entire content is transferred to a bulk tanker for transport either to a disposal facility or to the CSX Transflo intermodal transfer facility where rail cars are loaded. The facility has revised operations regarding returned rail cars so that most of them are coming in cleaned and RCRA empty. This has resolved the issue noted previously with storage of rail cars containing regulated residues. The tank shell thickness was tested earlier in the month by ultrasound, and inspection records were available.

The facility permit also authorizes operation of a solid waste solidification tub. The permit requires that this area be inspected for damage and cleaned daily on operating days. The solids and liquids from the leachate collection sumps are to be cleaned out daily, and managed as Class I solid waste. At the time of this inspection, no active treatment operations were noted. The tub held a mixture of liquids and solids, and spillage was noted on the walls and floor of the leachate collection system. It was not clear that the sump had

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been cleaned out recently. Further, the joints between the concrete walls and the metal extensions had allowed waste to leak onto the ground outside the walls. The spillage observed was cleaned up after the inspection. The side of a shed adjacent to this unit was splashed with multiple colors of waste liquids, indicating a chronic issue with splashing outside the permitted unit. Clean Harbors has an application pending to modify this area, and this issue will be addressed by Solid Waste Program personnel.

General facility inspection records, financial assurance documents, personnel training records, and the facility contingency plan were up to date. The contingency plan was last updated in November 2016, and the plan is reviewed at least annually.

New Potential Violations and Areas of Concern:

Violations

| | |
|--------------------|---|
| Type: | Violation |
| Rule: | 273.13(d)(1) |
| Explanation: | A container of universal waste lamps was in poor condition, and light fixtures with at least one loose HID lamp were noted on the pavement outside one building. This was corrected during the inspection. |
| Corrective Action: | Universal waste lamps must be stored in closed, structually sound containers. |
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| Type: | Violation |
| Rule: | 403.161(1)(b) |
| Explanation: | Failure to comply with the specific operating conditions for solid waste mix tub operations in Part II Subpart B 4 i of Solid Waste Permit 64247-SO-015 for the leachate control system. Waste spillage outside the containment and damage to the containment walls was observed. |
| Corrective Action: | Ensure that the leachate control system is inspected, operated and cleaned out in accordance with the permit. Additional controls may be needed to minimize waste releases. This violation will be addressed further by the Solid Waste Program |
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| Type: | Violation |
| Rule: | 264.35 |
| Explanation: | Aisle space was impaired in one bay of the north container storage building. This was corrected after the inspection. |
| Corrective Action: | Aisle space must be maintained in each container storage bay in accordance with the facility permit. |
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Conclusion:

Based on this inspection and, Clean Harbors has corrected the hazardous waste program noncompliance items noted in this report.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

| Item No. | Pre-Inspection Review | Yes | No | N/A |
|----------|--|-----|----|-----|
| 1.1 | Has the facility notified with correct status? 262.12 | ✓ | | |
| 1.2 | Has the facility notified of change of status? 62-730.150(2)(b) | | | ✓ |
| 1.3 | Did the facility conduct a waste determination on all wastes generated? 262.11 | ✓ | | |

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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.

Elizabeth Knauss
PRINCIPAL INSPECTOR NAME

Environmental Consultant
PRINCIPAL INSPECTOR TITLE

E. Knauss
PRINCIPAL INSPECTOR SIGNATURE

FDEP - SWD
ORGANIZATION 05/15/2017
DATE

Marty Allen
Inspector NAME

USEPA - ESD
ORGANIZATION

Mike Neill
Inspector NAME

USEPA - ESD
ORGANIZATION

Javier Garcia
Inspector NAME

USEPA Region IV
ORGANIZATION

Wes McDuffie
Representative NAME

Operations Manager
Representative TITLE

Clean Harbors
ORGANIZATION

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.

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John Bosek

Representative NAME

General Manager

Representative TITLE

Clean Harbors

ORGANIZATION

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Report Approvers:

Approver: Elizabeth Knauss

Inspection Approval Date: 05/15/2017
