



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

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**FACILITY INFORMATION:**

**Facility Name:** Heritage Crystal-Clean LLC  
**On-Site Inspection Start Date:** 01/30/2018      **On-Site Inspection End Date:** 01/30/2018  
**ME ID#:** 28737      **EPA ID#:** FLD065680613  
**Facility Street Address:** 105 S Alexander St, Plant City, FL 33563-4833  
**Contact Mailing Address:** 2175 Point Blvd Ste 375-EHS, Elgin, IL 60123-9216  
**County Name:** Hillsborough

**NOTIFIED AS:**

CESQG (<100 kg/month)

Transporter

Used Oil

**INSPECTION TYPE:**

Routine Inspection for CESQG (<100 kg/month) facility  
Routine Inspection for Used Oil Marketer facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for Used Oil Processor facility  
Routine Inspection for Used Oil Transfer Facility facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Jeff Tobergte, Inspector  
**Other Participants:** Tony Piotrowski, Field Services Supervisor

**LATITUDE / LONGITUDE:** Lat 28° 0' 42.0089" / Long 82° 8' 24.5084"

**SIC CODE:** 5093 - Wholesale trade - scrap and waste materials

**TYPE OF OWNERSHIP:** Private

**Introduction:**

FL DEP conducted a routine hazardous waste (HW) inspection and used oil processor (UOP) inspection of Heritage-Crystal Clean LLC (Crystal Clean), Plant City facility. Crystal Clean is a used oil transporter, processor and marketer, under DEP permit# 30676-HO-007. The facility will be submitting an application for permit renewal prior to the permit's expiration on 8/20/2018. Crystal-Clean produces a fuel oil that is equivalent to No. 5 Fuel Oil and an industrial oil, primarily for the phosphate industry. The Crystal-Clean site contains an oil re-refinery facility, laboratory, industrial wastewater pretreatment facility, storage tanks, and administration buildings. Very little has changed at the facility since the previous HW/UOP inspection of 05/20/2016. The inspector was accompanied by Mr. Tony Piotrowski, the Field Services Supervisor and primary designated emergency coordinator.

**Process Description:**

The facility's processes are described in detail in the 05/20/2016 inspection report, and prior inspection reports. The main processes and compliance items are briefly summarized below.

- The facility received used oils via truck, tanker truck and occasionally rail car. The oils are screened for halogens by field test methods, and by on-site lab testing. The oils are transferred to registered aboveground storage tanks, eventually to be processed on-site in the facility's used oil processing system. Processed/reclaimed oil is tested to determine specification, and then sold.
- The secondary containment areas around the storage tanks were clean and dry, with no visible indications of oil discharges or leaks. The concrete floors were in the process of being re-coated.

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- All containers and tanks were properly labeled, with “used oil” being the most common label.
- In the past 2 years, the facility has not had any instances of PCB contamination of oils.
- Drivers continue to use an electronic system for tracking oil pickups from customers.
- The roll-off box and hoppers that store used oil filters are kept under a roof. There were no protrusion problems, as had been noted in 2016.
- The lab generates conditionally-exempt amounts of COD lab-testing waste (D009, for mercury). The waste is manifested for mercury recycling.
- The facility still operates an industrial wastewater treatment system that discharges to a City POTW, under a City permit. Petroleum-contact water (PCW) is also treated.
- Records were up-to-date, and well-organized, including the Contingency/SPCC Plan, training records, very detailed weekly inspection logs, and transportation receipts and shipping papers.
- Although registered as an HW Transporter, the facility does not transport or store HW. Such operations are handled by the company’s Tampa facility.

**Conclusion:**

Based on the observations made during this inspection, the facility was operating in compliance with HW CESQG requirements, as well as used oil processor (UOP)/marketer requirements. The facility will renew its used oil facility permit prior to August 2018.

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**2.0 - CESQG 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. | Standards for Conditionally Exempt Small Quantity Generators  | Yes | No | N/A |
|----------|---|-----|----|-----|
| 2.2      | Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5   | ✓   |    |     |
| 2.3      | Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5  | ✓   |    |     |
| 2.4      | Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5  | ✓   |    |     |
| 2.5      | Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5   | ✓   |    |     |
| Item No. | Hazardous Waste Determination   | Yes | No | N/A |
| 2.6      | Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11<br><input type="checkbox"/> Is it excluded under 261.4?<br><input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261?<br><input checked="" type="checkbox"/> Has the waste been analyzed?<br><input checked="" type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied? | ✓   |    |     |
| Item No. | Record Keeping  | Yes | No | N/A |
| 2.7      | Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3)<br><input type="checkbox"/> Name and address of the generator and TSD/authorized facility.<br><input type="checkbox"/> Type and amount of hazardous waste delivered.<br><input type="checkbox"/> Date of shipment  | ✓   |    |     |
| 2.8      | Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)   | ✓   |    |     |

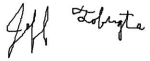
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**Signed:**

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.

Jeff Tobergte

Inspector

**Principal Inspector Name****Principal Inspector Title**


DEP

01/30/2018

**Principal Inspector Signature****Organization****Date**

Tony Piotrowski

Field Services Supervisor

**Representative Name****Representative Title**

Heritage-Crystal Clean

**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.

**Report Approvers:****Approver:** Shannon Kennedy**Inspection Approval Date:** 01/30/2018