



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

FACILITY INFORMATION:

Facility Name: Clean Harbors Florida LLC
On-Site Inspection Start Date: 05/04/2018 **On-Site Inspection End Date:** 05/04/2018
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 **Contact Phone:** (423) 842-8308

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: Shannon Kennedy, Environmental Manager; John Bosek, Facility 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 at Clean Harbors Florida's permitted hazardous waste storage facility. Clean Harbors was represented during the inspection by John Bosek, the facility manager. The facility was last inspected March 22, 2017. The facility's operating permit, 6247-017-HO/64247-SO-018 was modified effective March 21, 2018. It expires December 10, 2021.

Process Description:

The permit authorizes container and tank storage of hazardous waste, as well as fuel blending activities. Consumer fireworks collected from retail locations may be stored in a low explosives magazine that now occupies a previously authorized roll off storage location. This unit was empty at the time of the inspection. It was clean and well maintained.

Both of the facility's container storage buildings were within permitted capacity. Containers were managed in rows of pallets in accordance with the permit. Containers were closed, labeled and generally in good condition. Some dried waste was noted on the outside of some containers identified as concrete pipe slurry from an elevator repair company in Jupiter, FL. The facility's labeling and container bar coding systems allow containers to be traced to their incoming manifests, which reference the approved waste profiles for each generator. If problems are detected during checks conducted under the facility's waste analysis plan, Clean Harbors contacts the generator to resolve the situation. The concrete pipe slurry had initially been received as non-hazardous waste, but pH checks found that some of the drums contained characteristically corrosive waste, with a pH over 12.5. Clean Harbors was in the process of resolving this issue with the generator at the time of the inspection. The facility sometimes receives unmanifested waste transported on bills of lading by

Inspection Date: 05/04/2018

Safety Kleen. Clean Harbors provides unmanifested waste reports to the Department for these shipments.

The facility's tank system was in compliance with Subpart J requirements. Valves and flanges were tagged as required by 40 CFR 264 Subparts AA and BB. Inspections and emissions monitoring are being conducted in accordance with the permit, and records are maintained. One tank is out of service due to corrosion detected in a shell thickness check.

At the time of this inspection, used oil and compatible non-hazardous wastes were being unloaded from drums in the fuel blending area. The wastes were being pumped into a tank trailer parked next to the tank farm, rather than the used oil tanks. This is a relatively new procedure at the facility, and a loaded tanker may be parked on site for several days, pending approval of the load by the receiving used oil facility. The paved area provides sufficient containment for the loaded tanker in accordance with the permit and 40 CFR 279.45. The paved area has also been certified to provide adequate secondary containment for loaded hazardous waste roll offs. Empty containers are stored on site pending recycling through a drum service.

Emergency equipment was in place and was well maintained. The facility contingency plan, personnel training records, inspection records and manifests were reviewed and found to be in compliance. The contingency plan annual review was conducted in November 2017.

Conclusion:

Based on the results of this inspection, Clean Harbors was in compliance with hazardous waste and used oil management requirements. Solid waste processing operations were not reviewed during this inspection.

Inspection Date: 05/04/2018

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.

Note: Checklist items with shaded boxes are for informational purposes only.

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	✓		

Inspection Date: 05/04/2018

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 Environmental Consultant
Principal Inspector Name **Principal Inspector Title**


Principal Inspector Signature **Organization** **Date**
 FDEP - SWS 05/25/2018

Shannon Kennedy Environmental Manager
Inspector Name **Inspector Title**

FDEP - SWD
Organization

John Bosek Facility Manager
Representative Name **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.

Wes McDuffie Operations Manager
Representative Name **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.

Report Approvers:

Approver: Elizabeth Knauss **Inspection Approval Date:** 05/25/2018