FLORIDA DEPARTMENT OF
Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 9, 2018

Mr. Edward Maylon, General Manager
Water Recovery, LLC
1819 Albert Street
Jacksonville, FL 32202
EMaylon@wrijax.com

Re: Water Recovery, LLC
EPA/DEP ID: FLR 000 069 062
Duval County – Hazardous Waste

Dear Mr. Maylon:

Department personnel conducted a compliance inspection of the above-referenced facility on July 24, 2018. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records and any non-compliance items which may have been identified at the time of the inspection have been corrected.

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 Bonnie Bradshaw at 904-256-1638 or via e-mail at bonnie.bradshaw@FloridaDEP.gov.

Sincerely,

Matthew Kershner
Environmental Manager

MK/bb

Enclosure: Inspection Report

cc: FDEP: Bonnie Bradshaw, Cheryl L. Mitchell, Pamela Fellabaum, DEP_NED
Amanda Kimball, Water Recovery, LLC – Akimball@wrijax.com
Nicole Neumann, Water Recovery, LLC – Nneumann@wrijax.com

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Water Recovery LLC

On-Site Inspection Start Date: 07/24/2018 **On-Site Inspection End Date:** 07/24/2018

ME ID#: 36081 **EPA ID#:** FLR000069062

Facility Street Address: 1819 Albert St, Jacksonville, FL 32202-1103

Contact Mailing Address: 1819 Albert St, Jacksonville, FL 32202

County Name: Duval **Contact Phone:** (904) 475-9320

NOTIFIED AS:

Used Oil

VSQG

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector

Other Participants: Edward Maylon, General Manager

LATITUDE / LONGITUDE: Lat 30° 19' 35.9975" / Long 81° 37' 52.9911"

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

TYPE OF OWNERSHIP: Private

Introduction:

Water Recovery, LLC (WR) was inspected July 24, 2018, as an unannounced hazardous waste compliance inspection. The records review was conducted as an announced inspection on August 1, 2018. WR's last hazardous waste inspection conducted by the Department was on July 28, 2016. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste. The facility notified as a Conditionally Exempt Small Quantity Generator on January 18, 2018. The facility was requested to update its 8700-12FL notification to reflect the change to a VSQG, as well as make any other required changes during the inspection on July 24, 2018. WR has been issued the EPA/DEP identification number: FLR 000 069 062. Please use this EPA/DEP identification number on all hazardous waste related correspondence with the Department. A Used Oil Processing Facility Operating Permit (permit number 79677-HO-012) was renewed on January 29, 2016, and expires on October 11, 2020.

WR is a permitted used oil processing and industrial wastewater treatment facility. The facility is registered as a Used Oil Transporter/Transfer Facility/Processor/Marketer, Used Oil Filter Transporter/Transfer Facility/Processor, and Petroleum Contact Water (PCW) Recovery/Transporter/Management Facility. The facility has been operating as Water Recovery, LLC at this location since 2008, has approximately 20 employees and is connected to city water and sewer.

WR's facility includes of a main office, a Laboratory Trailer, a Dry Storage Area, a Maintenance Shed, an Old Laboratory Trailer (labeled Maintenance Building in the permit application), a Used Oil/PCW Processing Area (black tank farm), a Wastewater Processing Area (green tank farm), a Truck Clean-out Holding Pit, a Solid Waste Solidification Area, Grease Trap Waste Tanks and Landfill Leachate Wastewater Tanks. William

Conway, Operations Supervisor, was present throughout the inspection on July 24, 2018. Edward Maylon, General Manager, and Amanda Kimball, Assistant General Manager, were present throughout the inspection on August 1, 2018. Pam Fellabaum (DEP) was also present throughout both inspections.

Process Description:

Laboratory Trailer

Staff sample all incoming wastes. Personnel collect samples using an upper and lower grab sampler, or a Composite Liquid Waste Sampler (COLIWASA) for fingerprint analysis. The lab is located in a small trailer next to the wastewater processing area that is described below. A fingerprint analysis checks for total organic halogens, quantity, pH, color, odor, solids and flashpoint. The facility uses the Dexsil Hydroclor-Q or Dexsil Chlor-D-Tect Q4000 to check for total organic halogens, however, the test kits observed on site expired June 2015 and October 2016 respectively (Photos 1 and 2) [40 CFR 279.53(a)]. The facility had ordered new kits as of the August 1, 2018, inspection. Dexsil Hydroscout test kits are used to measure oil content by adding 1 ml of sample to the vial. The test kit includes a disposal ampule and instructs users to dispose of the waste in the regular lab waste. The facility disposes of the spent vials in the oily waste can. The facility is reminded that liquid used oil may not be disposed of in landfills and should be recycled as a liquid. Toluene is used for oil distillations if the Hydroscout test kit results are questioned. Spent toluene is recycled through distillation. Toluene contaminated oil is stored in a container in the flammable cabinet awaiting adequate product for distillation. Due to the limited quantity of toluene contaminated oil produced, it is only rarely distilled and has not been distilled since the previous inspection. The facility is reminded to dispose of toluene contaminated still bottoms as F005 hazardous waste. Tests for pH, color, odor, solids and flashpoint do not require any reagents and do not generate any hazardous waste.

Wastewater must be tested prior to discharge to ensure compliance with the wastewater permit. The facility checks for total nitrogen, total phosphorus, chemical oxygen demand (COD), 16 metals, clarity, turbidity, pH and solids. Nitrogen, phosphorus, and COD are tested using vials to which the sample and additional reagents are added. Review of the Safety Data Sheets (SDSs) for the nitrogen vials and reagents indicate the presence of sulfuric acid, diantimony tris(sulphate), sodium hydroxide, disodium carbonate, potassium persulfate, sodium metabisulfite, quartz, urea and 2,7-Naphthalenedisulfonic acid. Review of the phosphorus vials and associated reagents SDS indicate the presence of sulfuric acid, potassium persulfate, potassium pyrosulfate, L-Ascorbic acid, sodium molybdate, tetrasodium EDTA and Antimonate(2-),bis[.mu.-(2,3-dihydroxybutanedioato(4-)-O1,O2:O3,O4)]di-, dipotassium, trihydrate, stereoisomer. Review of the COD vials and associated reagents SDS indicate the presence of sulfuric acid, sulfuric acid mercury (2+) salt (1:1), sulfuric acid disilver (1+) salt and chromic acid. Based on the disposal section of the SDSs there may also be trace amounts of mercury in the COD vials. There was one 5-gallon satellite container of spent nitrogen, phosphorus, and COD vials accumulating (D002/D007/D009/D011) and one 5-gallon satellite container of spent COD vials accumulating (Photos 3 and 4). The facility generates about one 5-gallon container of each waste stream per year. The facility began accumulating the COD vials in the Hach (COD vial manufacturer) provided recycling container in April 2018. None of this waste has been sent off-site to date. Hach advertises this “EZ COD Recycling” as an all-inclusive service where the Hach spent COD vials are placed into the provided recycling container. The container is then either mailed back or picked up by Heritage Environmental Services (Heritage) for mercury and silver reclamation. Hach referred the inspector to Heritage for questions regarding the disposal. On August 20, 2018, Mike Pacuch from Heritage stated that the Hach website was incorrect and there has been no mercury recycling since 2012, as there is currently no one in the US that will buy mercury. He stated the COD vial waste is centrifuged and mercury containing sludge sent to a facility in Wisconsin for mercury extraction and long-term storage. He stated there is not enough chromium or silver in the waste stream for recycling or reclamation and the other waste constituents are treated as hazardous waste. Therefore, since the materials do not appear to be recycled, it is recommended that the COD vials be handled and disposed of as hazardous waste or written assurances provided from the waste handler of legitimate recycling/reclamation. Metals, clarity, turbidity, pH and solids testing do not require reagents and do not generate hazardous waste.

The facility collects used oil and oily wastewater generated from samples in a container (Photo 5). It was properly labeled. The facility has a trash can labeled “oily waste” for collection of wastes contaminated with oil. The waste is disposed of in a non-hazardous waste roll-off. There were several small containers of oily liquids observed in the trash can. The facility is reminded that liquid used oil may not be disposed of in landfills and should be collected in the used oil container.

The facility has acetone on site which has been used in the past for cleaning. It is currently not used in the process or for cleaning, and no waste stream was present at the time of inspection. The facility disposed of several unused or expired chemicals (silver sulfate sulfuric acid, hexadecane, silver nitrate, pyridine barbituric acid, phenolphthalein solution, lead subacetate, mercuric sulfate, potassium dichromate, potassium hydroxide, chloramine-T, trichloroflouroethane, hexane, ferrous ammonium, hydrochloric acid, sodium bisulfate, sodium phosphate, sodium hydroxide, sodium acetate, magnesium chloride, ferrous sulfate hydrate, ammonium chloride) during the last hazardous waste shipment on May 3, 2018.

The facility is reminded to ensure that when waste codes are provided, the proper codes are used. Since the lead subacetate disposed of on May 3, 2018, was unused, the appropriate waste code should have been U146, not D008. The phosphorus/nitrogen/COD vials manifest dated March 8, 2018, did not include waste codes D007/D009/D011. In addition, waste codes F003/F005/D001 should not have been used based on review of the provided SDS and the lab manager's statement that only the phosphorus/nitrogen/COD vials were disposed of during this shipment.

Laboratory Record Review

WR is currently operating as a VSQG of hazardous waste for small amounts of lab waste. The waste is transported by EQ Industrial Services (MIK 435 642 742) and manifested off-site to EQ Florida (FLD 981 932 494).

Dry Storage Area

The Dry Storage Area is a roofed structure where equipment is stored. A homemade aerosol can puncturer was observed in this area (Photo 6). The cans are punctured, but any residual liquids are not collected and are allowed to evaporate [40 CFR 262.14(a)(5)].

Maintenance Shed

The Maintenance Shed is a small work space where the facility performs small repairs and maintenance. The maintenance shed is located adjacent to the used oil processing area. This area does not accumulate or generate any hazardous waste, only small amounts of used oil or used oil filters. There were no containers accumulating in this area at the time of inspection. There are two fire extinguishers, depicted in the permit application attachments, required to be located adjacent to the maintenance shed. Only one operable fire extinguisher was observed in this area at the time of inspection on July 24, 2018 (Photo 7) [40 CFR 279.52(a)(2)(iii); Permit Condition, Part I #41(b)]. A second fire extinguisher had been installed by the time of the inspection on August 1, 2018.

Old Laboratory Trailer (maintenance building)

The Old Laboratory Trailer is a small work space where tools are stored and occasionally conductivity tests are performed on samples at the request of JEA. The Old Laboratory Trailer is located west of the Used Oil Processing Area. This area does not accumulate or generate any hazardous waste. There is a PVC pipe which exits the ground directly behind the trailer (Photo 8). The pipe, located on the outside of the chain-link fence and equipped with several clean-outs, is piped to the secondary containment area of the used oil processing area. The maintenance representative stated that the pipe is the discharge pipe for the trailer sink. The facility is reminded that only handwashing water may be discharged from this sink.

Used Oil/Petroleum Contact Water (PCW) Processing Area

The facility receives shipments of used oil and PCW by tanker truck. The Used Oil Processing Area is a tank farm of ten black-painted aboveground storage tanks and a heater (Photos 9 and 10). Used oil and oily wastewater is accepted and transferred to black side tanks that store or conduct stationary settling for hours or several days to separate the used oil and wastewater. The 2-P tank uses heat, or chemical additives and heat to aid in the separation process. Separated wastewater and debris are piped to the wastewater treatment green side tanks described below for further treatment. The used oil is transferred between tanks as necessary to achieve a marketable "batch" of used oil product. PCW is recovered by stationary separation and accumulated only in the aboveground 7-P tank. Decanted wastewater and debris are piped to the green side wastewater treatment tanks for further treatment. The facility analyzes the PCW solids for metal, volatile and semi-volatile Toxicity Characteristic Leaching Procedure (TCLP) constituents each time solids are

removed from the tank. Most recent results dated January 25, 2017, indicate the waste is non-hazardous.

The first tank 1-P, is closest to the main office and is aligned in consecutive order with the other tanks, 2-P to 10-P. The estimated capacities for the tanks are as follows: 1-P, 2-P, 3-P, 4-P, 23,000 gallons each; 5-P, 7-P, 8-P, 9-P, 21,000 gallons each; 6-P, 25,000 gallons; and 10-P, 10,000 gallons. The tank system is fully interconnected and able to transfer the total estimated capacity of 211,000 gallons freely between tanks. In addition to the permitted tanks, there are three 1,200-gallon portable tanks labeled B1, B2 and B3 and a 4,000-gallon portable tank labeled G2 (Photo 11). B1, B2 and B3 are used to offload small containers of industrial wastewater, such as totes, while the larger tanks are not designed for such small loads. G2 is used to offload industrial wastewater when batch tanks are full. The portable tanks were located south of the black side tanks and north of the tote storage area. These are not listed in the facility's current permit. The facility is reminded to incorporate these portable tanks into the permit during the next revision. The small tank adjacent to the tote storage area contains clean fuel for plant use.

All black side tanks were labeled "Used Oil" or "PCW" as applicable and located in a secondary containment area capable of containing 110% of the volume capacity of the largest tank. Although the permit allows for the tanks to be labeled "PCW," the rule requires the tanks to be labeled as "Petroleum Contact Water." The facility is requested to relabel the PCW tank(s) as "Petroleum Contact Water." An inspection of the secondary containment area revealed that a small amount of what appeared to be used oil sludge and leaf debris was accumulating around tanks inside the secondary containment area (Photos 12 and 13). The facility is reminded to remove spilled or leaked waste from the secondary containment areas within 24 hours of detection. There were a few cracks observed in the secondary containment area in a few places that appeared to be unsealed on July 24, 2018, (Photos 14 and 15) [40 CFR 279.54(d)(2); Permit Condition, Part I #33]. These cracks had been repaired by the time of the inspection on August 1, 2018.

In addition to the missing fire extinguisher at the maintenance shed, both fire extinguishers, depicted in the permit application attachments in the heater system area, were also missing at the time of inspection on July 24, 2018 [40 CFR 279.52(a)(2)(iii); Permit Condition, Part I 41(b)]. Two fire extinguishers, as well as an eyewash station, had been installed in the heater system area by the inspection on August 1, 2018. Other safety, spill and decontamination equipment appeared in order.

The perimeter of the plant is secured by a chain-link fence topped with barbed wire, however, vegetation observed adjacent to and on the fence appeared to create an opportunity for unauthorized entry (Photo 16). In addition, the open dumpster lid and debris along the fence line of the adjacent property (Photo 17) appeared to create another opportunity for unauthorized entry. It was recommended that the facility address these security issues.

Used Oil Processing Records Review

A review of the records for waste acceptance revealed that the full fingerprint analysis is performed and documented on each incoming sample. The analysis is documented on the waste manifest. The waste stream approval number and off load tank number are documented in the MAST electronic database. Some acceptance records did not include the generator's EPA identification number [40 CFR 279.56(a)(4); Permit Condition, Part II #1(a); 62-710.510(1)(b), FAC]. Some acceptance records did not include the type code from DEP Form #62-710.901(2) [62-710.510(1), FAC].

WR markets used oil from the black side tanks (except tanks 2-P and 7-P) in batches of product. All batches of outgoing used oil are checked against a fingerprint analysis unique to the receiving facility. Outgoing shipments to used oil burners are checked for total organic halogens, lead, chromium, cadmium, arsenic, flashpoint and quantity. Outgoing shipments to used oil marketers and processors are checked for total organic halogens, flashpoint, quantity and % water. Used oil usually only remains on-site for about one week. All sales transactions are recorded on a WR "Retail Oil Sale Tracking Form" and retained on site for three years. A bill of lading is also included with the tracking form records. Neither of these documents contained the end use code [62-710.510(1), FAC].

PCW Records Review

Written certification is obtained from each transporter with the waste profile which includes whether the PCW contains recoverable product and whether the PCW contains levels of hazardous constituents above those found in the source of the PCW. PCW acceptance records appeared in order. PCW usually only remains on-

site for about 2-3 weeks. All sales transactions are recorded on a WR "Retail Oil Sale Tracking Form" and retained on site for three years. Outgoing shipments of PCW to marketers and processors are checked for: total organic halogens, flashpoint, quantity and % water.

Used Oil Filters

WR is a registered Used Oil Filter Transporter, Filter Transfer and Filter Processor Facility. Metal used oil filters are received and maintained in drums. There have been no metal used oil filters received since the previous inspection. Paper used oil filters are received and maintained in grated boxes equipped with drip pans. Any oil that collects in the drip pans is pumped out and processed on site. The drums and boxes are stored in the used oil filter storage area adjacent to the Solid Waste Solidification Area described below. There were no drums of used oil filters accumulating at the time of the inspection. Drums stored in the area at the time of inspection were empty (Photo 18). Paper oil filters are landfilled in Chesser Island Landfill in Georgia. Metal oil filters, when received, are shipped to Clean Stream for processing. The facility is reminded that used oil filters are prohibited from disposal in Florida landfills.

Used Oil Filter Records Review

Only paper oil filters have been received since the last inspection. Used oil filter records indicate paper filters are disposed of as non-hazardous waste at the Chesser Island Landfill.

Wastewater Processing Area

The Wastewater Processing Area is a tank farm of eleven green-painted cone-bottom batch tanks and a plate-and-frame filter press (Photo 19). The main green tank farm is numbered 1-W to 9-W, and is aligned in consecutive order tank pairs, 1-W/2-W, 3-W/4-W, 5-W/6-W, 7-W/8-W, with 9-W closest to the main office. Green tanks 10-W and 11-W are adjacent to the plate-and-frame filter press. The estimated capacities for the tanks are as follows: 1-W to 9-W, 7,000 gallons each; 10-W and 11-W, 50,000 gallons each. The green tank system is a unilaterally interconnected loop, with wastewater piped to tank 9-W receiving the most treatment.

The green side tanks allow WR to tailor treatment of oily wastewater to a specific batch. Oily wastewater undergoes chemical treatments in the tanks that include emulsion breaking, metals precipitation and chromium reduction. Cyanide destruction no longer occurs, as it has been removed from the wastewater treatment permit. After batch pretreatment, the wastewater can be processed in the continuous loop system as needed, and then collected in the equalization tank 11-W. Tank 11-W adjusts for pH and system equalization for over dosage control.

The treated wastewater is then pumped through an American Petroleum Institute (API) oil/water separator. Separated oil is piped to the black side tank 2-P for heat and chemical treatment. Next, the DAF unit performs continuous chemical precipitation and solids removal. Finally, treated wastewater is accumulated in tank 10-W, tested and discharged to the city sewer. There are two city sewer compliance sampling points located outside the main security fence at the corner of East Bryan Street and Albert Street (Photo 20) and in a small building adjacent to the north side of the used oil processing black tank farm (Photo 21).

The sludge, residue and by-products that are generated from this process are accumulated in a plate-and-frame filter press and dewatered. The filter media is Perlite. The generated filter cake is then accumulated in a roll-off container (Photo 22) and added to the solidification pits before being sent off-site as non-hazardous waste for disposal to a landfill in Valdosta, Georgia or Chesser Island Landfill. The facility currently analyzes the filter press solids quarterly for Toxicity Characteristic Leaching Procedure (TCLP) metal, semi-volatile, and volatile constituents. Results have indicated the waste is non-hazardous.

Truck Clean-out Holding Pit

A Truck Clean-out Holding Pit is located across East Bryan Street (Photo 23). Customers can clean-out their trailers of non-hazardous waste into the holding pit for disposal by WR. The liquid is pumped to the other side of the street for processing. The solids are added to the solidification pits before being sent off-site as non-hazardous waste for disposal to a landfill in Valdosta, Georgia or Chesser Island Landfill. The facility currently analyzes the truck clean-out solids quarterly for Toxicity Characteristic Leaching Procedure (TCLP) metal, semi-volatile, and volatile constituents. Results have indicated the waste is non-hazardous.

Solid Waste Solidification Area

A large, two-pit Solid Waste Solidification Area is also located across Bryan Street (Photo 24). The pit is used to solidify other facility's waste streams containing solids, sludges and wastewater with heavy suspended solids. This activity may need a solid waste permit. A copy of this inspection report is being sent to the DEP Solid Waste Program Subject Matter Expert for a solid waste permit determination. In addition, WR process wastes, including the wastewater filter cake and truck clean-out solids, are also added to the pit. This solid waste mainly consists of tobacco, peanut shells, paper dust, ceiling tile dust and other non-hazardous solids or sludge. A small bucket loader is used to mix up the solid, non-hazardous waste before being sent off-site for disposal to a landfill in Valdosta, Georgia or Chesser Island Landfill. The facility currently analyzes the solidification pit sludge quarterly for Toxicity Characteristic Leaching Procedure (TCLP) metal, semi-volatile, and volatile constituents. Results have indicated the waste is non-hazardous.

Grease Trap Waste Tanks

There were two 5,000-gallon tanks and one 12,000-gallon tank that were previously used for grease trap waste. These tanks now contain non-hazardous wastewater used in the solidification pits.

Landfill Leachate Wastewater Tanks

There were two landfill leachate wastewater tanks (Photo 25) located adjacent to the truck clean-out holding pit. The tanks receive leachate from tanker trucks. Recovered leachate wastewater is stored in tanks and then discharged, typically without treatment. If treatment is required due to nitrogen levels, aeration of the wastewater is performed until acceptable nitrogen levels are achieved.

The facility is no longer allowed to comingle rainwater collected in the secondary containment on the East Bryan Street side with landfill leachate due to an amendment to its JEA permit. Therefore, the facility must transport the rainwater by tanker to the Albert Street side for processing. The secondary containment areas on the East Bryan Street side contained water at the time of inspection, but there have been several recent rain events. The facility is reminded that such water should be removed from the secondary containment areas within 24-hours.

Record Review

WR is currently operating as a VSQG of hazardous waste for small amounts of lab waste and aerosol cans. The waste is transported by EQ Industrial Services (MIK 435 642 742) and manifested off-site to EQ Florida (FLD 981 932 494). The last hazardous waste shipment occurred May 3, 2018.

The facility had on display its current DEP "Used Oil" registration from the Department and has submitted its current certificate of liability insurance. WR has also submitted its 2017 Used Oil and PCW annual report to the Department's Tallahassee office.

A review of WR's other operating records, required inspections, personnel training, Spill Prevention Control and Countermeasures plan (SPCC) and Contingency Plan were found to be in order. The facility indicated that it has not had to implement ITS contingency plan since the last inspection.

*******NOTE: As of June 18, 2018, the State of Florida has adopted the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility is impacted by the rule change.

Please see the eCFR site for a copy of the Federal rule at -
https://www.ecfr.gov/cgi-bin/text-idx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28_02.tpl#0

The November 28, 2016, Federal Register also has a good discussion about the new requirements -
https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf

Copies of PowerPoints that discuss the new requirements may also be found here -
https://floridadep.gov/northeast/ne-compliance-assurance/content/compliance-assurance-resources

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.14(a)(5)
Explanation:	Aerosol cans are being punctured using a homemade device that does not collect can contents or residues.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated 10/2/18 which included an invoice for the purchase of an AeroVent can puncturing device with filter and collection drum. The facility stated in the email dated 10/2/18 that waste aerosol cans would be collected until receipt of the device and that following receipt of the device, the cans would be punctured and residues managed as hazardous waste.

Type:	Violation
Rule:	279.52(a)(2)(iii)
Explanation:	Used oil processing facility permit application attachments depict two fire extinguishers located adjacent to the maintenance shed and two fire extinguishers located in the heater system area. There was only one fire extinguisher present adjacent to the maintenance shed and no fire extinguishers in the heater system area.
Corrective Action:	No further action is required. The facility returned to compliance on 8/1/18 by placing fire extinguishers in the correct location.

Type:	Violation
Rule:	279.53(a)
Explanation:	Dexsil Hydroclor-Q and Dexsil Chlor-D-Tect testing kits being used for halogen screening had expired in June 2015 and October 2016.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated 10/1/18 which included a photo of new Chlor-D-Tect testing kits with an expiration date of June 2019.

Type:	Violation
Rule:	279.54(d)(2)
Explanation:	A few cracks that did not appear to be sealed were observed in the secondary containment area of the used oil processing area.
Corrective Action:	No further action is required. The facility returned to compliance on 8/1/18 when the cracks were observed sealed. In the future, if cracks or gaps in the secondary containment system are observed during the required inspections prior to beginning operations, the facility should repair the cracks and gaps prior to beginning operation of the facility.

Type:	Violation
Rule:	279.56(a)(4), 62-710.510(1)(b), 62-710.510(1)(d)
Explanation:	Some used oil acceptance records did not include the generator's EPA identification number and the type code from DEP Form 62-710.901(2) as required.

Corrective Action:	No further action is required. The facility returned to compliance via an email dated 10/3/18 demonstrating that all required information is now being maintained. In the future, the facility should maintain used oil acceptance records which include all required information for three years.

Type:	Violation
Rule:	62-710.510(1)
Explanation:	Used oil shipment records did not contain the end use code from DEP Form 62-710.901(2) as required.
Corrective Action:	No further action is required. The facility returned to compliance via an email dated 10/1/18 which included a screenshot demonstrating that the end use code has been added to the facility's outgoing oil load form. In the future, the facility should maintain used oil shipment records which include all required information for three years.

PHOTO ATTACHMENTS:

Photo 1

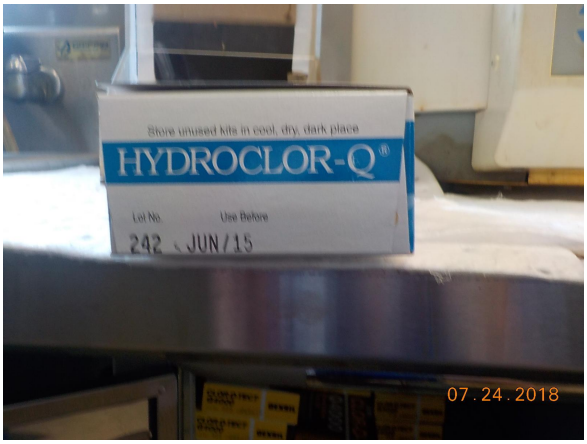

Photo 2

Photo 3

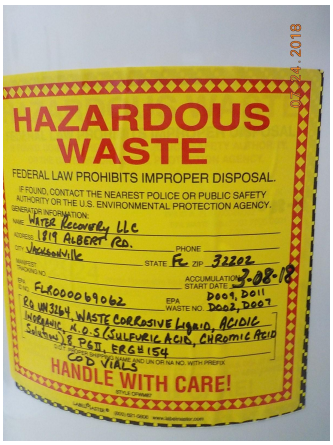

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

Photo 10

Photo 11

Photo 12

Photo 13

Photo14

Photo 15

Photo 16

Photo17

Photo 18

Photo 19

Photo 20

Photo 21

Photo 22

Photo 23

Photo 24

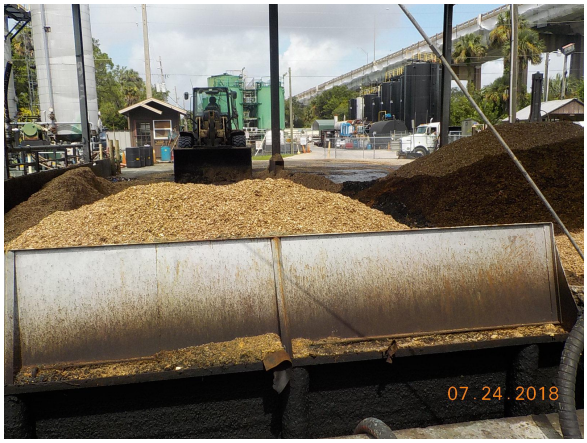

Photo 25

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? 262.18(a)	✔		
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	✔		

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.

Bonnie M Bradshaw	Inspector	
Principal Inspector Name	**Principal Inspector Title**	
B. Bradshaw	DEP	10/05/2018
Principal Inspector Signature	**Organization**	**Date**

Edward Maylon	General Manager
Representative Name	**Representative Title**
	Water Recovery, LLC
	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: Pam Fellabaum **Inspection Approval Date:** 10/05/2018