



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 13, 2019

Michael Hirst, Terminal Manager
Freehold Cartage, Inc.
520 Beechcraft St
Bartow, FL 33830
mhirst@freeholdcartage.com

Re: Freehold Cartage Inc
EPA ID No. FLD984187831
Polk County

Dear Mr. Hirst:

Department personnel conducted a routine hazardous waste compliance evaluation inspection of the above-referenced facility on February 19, 2019. Based on the information provided during the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

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 Ileana Hernandez at (813) 470-5945, or via e-mail at: ileana.hernandez@floridadep.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "SK", is written over a blue horizontal line.

Shannon Kennedy
Environmental Manager
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Chris Roberts, Freehold Cartage, Inc., croberts@freeholdcartage.com
Michael Ferguson, Polk County, MichaelFerguson@polk-county.net



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

FACILITY INFORMATION:

Facility Name: Freehold Cartage Inc

On-Site Inspection Start Date: 02/19/2019 **On-Site Inspection End Date:** 02/19/2019

ME ID#: 16638 **EPA ID#:** FLD984187831

Facility Street Address: 520 Beechcraft Street, Bartow, FL 33830

Contact Mailing Address: 520 Beechcraft St, Bartow, FL 33830

County Name: Polk **Contact Phone:** (863) 533-4599

NOTIFIED AS:

SQG (100-1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Hazardous Waste Transfer Facility facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for SQG (100-1000 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Ileana A Hernandez, Environmental Specialist II

Other Participants: Abigail Bridges, Environmental Specialist I; Leslie Pedigo, Environmental Specialist III; Michael Hirst, Terminal Manager; Chris Roberts, Dock Supervisor

LATITUDE / LONGITUDE: Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On February 19, 2019, Freehold Cartage, Inc. ("FCI"), was inspected by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with hazardous waste and used oil management rules. The facility was last inspected by the Department's hazardous waste section on January 23, 2015. Mr. Michael Hirst and Mr. Chris Roberts accompanied the Department inspectors throughout the facility.

Process Description:

FCI is a registered hazardous waste, used oil, used oil filter, and universal waste transporter and transfer facility. FCI has approximately 35 employees at this location. The facility seldom transports used oil and no longer operates waste tankers out of this location. FCI screens all drums of used oil with Dexsil Clor-D-Tect testing kits prior to pick-up. If the used oil fails the halogen test, FCI has the option to either reject the drum or request a hazardous waste manifest. No consolidation or mixing of hazardous waste and used oil is conducted on-site. Hazardous waste containers are stored up to 10 days within two storage trailers that are not utilized for transport which are located at the loading dock.

Since the previous 2015 inspection, FCI has expanded their transfer loading dock and the paved storage area. The facility's emergency equipment, contingency plan, training records, transfer log, and manifests were

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reviewed during the inspection. No discrepancies or errors were noted during the manifest review. Universal waste lamps are sent to Veolia Environmental Services in Tallahassee, FL, for recycling.

The facility underwent an address change by Polk County on 06/15/15 from the former 175 Bartow Municipal Airport to the current 520 Beechcraft Street. Due to the facility's location near the airport, the area is always under surveillance. The facility is also fenced providing additional security and controlled access.

In late August of 2017, FCI had scheduled outgoing shipments of hazardous waste from their Bartow transfer facility to Veolia in Port Arthur, TX, within the 10-day storage time limit requirement. Due to Hurricane Harvey making landfall in Texas during that time, FCI requested the Department for an extension of the 10-day storage time limit and submitted a letter from the Governor of Texas, Mr. Greg Abbott, proclaiming a state of disaster signed and dated on 08/23/17. The Department subsequently granted a 20-day extension (i.e. 30 days total storage time) to FCI on 08/25/17.

Conclusion:

Based on the observations made at the time of the inspection, Freehold Cartage, Inc., was operating in compliance with hazardous waste and used oil management rules applicable to small quantity generators, hazardous waste transporters, hazardous waste transfer facilities, used oil transporters, used oil transfer facilities, and universal waste transporters.

*Please note that Florida adopted the Generator Improvements Rule on June 18, 2018.

**Please note, following the adoption of the new Generators Improvement Rule, as per 40 CFR 262.18(d)(1), small quantity generators of Hazardous Waste must re-notify every four years starting in 2021. This re-notification must be submitted by September 1st of each year in which re-notification is required.

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6.0 - Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓

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Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(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.

Ileana A Hernandez

Environmental Specialist II

Principal Inspector Name**Principal Inspector Title**

FDEP-SWD

03/11/2019

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

Abigail Bridges

Environmental Specialist I

Inspector Name**Inspector Title**

FDEP-SWD

Organization

Leslie Pedigo

Environmental Specialist III

Inspector Name**Inspector Title**

FDEP-SWD

Organization

Michael Hirst

Terminal Mannager

Representative Name**Representative Title**

Freehold Cartage, Inc.

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.

Chris Roberts

Dock Supervisor

Representative Name**Representative Title**

Freehold Cartage, Inc.

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:** 03/12/2019