



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

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC
On-Site Inspection Start Date: 12/12/2019 **On-Site Inspection End Date:** 12/12/2019
ME ID#: 28737 **EPA ID#:** FLD065680613
Facility Street Address: 105 S Alexander St, Plant City, Florida 33563-4833
Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, Illinois 60123
County Name: Hillsborough **Contact Phone:** (847) 836-5670

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec, Off-Spec, Oil Filters, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Marketer Facility
Routine Inspection for Used Oil Generator Facility
Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon Lenhart, Inspector
Other Participants: Shannon Kennedy, Environmental Manager; Tony Piotrowski, Facility Manager

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

NAIC: 423930 - Recyclable Material Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Heritage Crystal-Clean, LLC (HCC) was inspected by the Department on December 12, 2019 to determine compliance with the facility's permit and with state and federal regulations governing used oil and hazardous waste. HCC is a used oil transporter, processor and marketer of on-spec used oil operating under permit #30676-010-HO, which expires on August 20, 2023. The facility produces a fuel oil that is equivalent to No. Five Fuel Oil and an industrial oil for the phosphate industry. The site contains an oil re-refinery facility, laboratory, industrial wastewater pretreatment facility, storage tanks, maintenance garage and administration buildings. Little has changed at the facility since the previous inspections of May 20, 2016 and January 30, 2018, except as noted. Department personnel were accompanied by Mr. Tony Piotrowski, facility manager.

Process Description:

Heritage Crystal-Clean, LLC is a used oil re-refining facility. The facility collects used oils, oily wastes, petroleum contact water (PCW), off-specification fuels, used oil filters, and waste antifreeze from numerous commercial generators and transports them to the facility. HCC receives used oils via truck, tanker truck and occasionally rail car. The oils are screened for halogens by field test methods. If the used oil is found to contain >1,000 ppm halogens, the oil will not be collected without direction and approval from Crystal-Clean's divisional oil and vacuum service manager. In addition to the field screening, at least one retain sample is obtained at each pick-up. Oils are screened again by on-site lab testing. All incoming loads are screened for halogen content upon arrival. The oils are transferred to registered above-ground storage tanks, eventually to be processed on-site in

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the facility's used oil processing system. Processed/reclaimed oil is tested to determine specification, and then sold. Single source loads that fail the screening are kept segregated until the presumption is either rebutted or not. If it cannot be rebutted, the load is rejected, and usually returned to the generator unless other arrangements are made. Loads of consolidated used oil that fail the halogen screening upon arrival are segregated and analyzed to characterize the waste. Each retain sample is then analyzed to determine which customer had the contaminated used oil. If the presumption can be rebutted based on who generated it (e.g., VSQG) it will be accepted. If not, the load is transported to a TSD, and the original generator signs the hazardous waste manifest. Segregation for loads received from a third party transporter are segregated by placing the material into a dedicated tank and are not released until additional screening is conducted and passed.

Once at the facility, used oil filters are transferred from drums to dumpster hoppers. The dumpster hoppers are then transferred into roll-offs located on site. There is no longer a used oil filter crusher located on site, as the crusher was drained and scrapped in 2016. Used oil filters are sent to Miami, Florida where they are crushed and smelted. Paper used oil filters are managed as non-hazardous waste and are sent to McKay Bay Waste-to-Energy facility.

Totes of antifreeze are brought to the facility via tractor trailers. Antifreeze is maintained in Tank One, and then sent to the old Glyeco plant in Lakeland that was acquired by HCC in February of 2019; the Lakeland facility only receives antifreeze.

GARAGE

The garage area is a covered area and includes an impermeable surface. Various properly labeled used oil and used oil filter drums were located in this area. Drums containing used oil filters are placed in the drum dumper, and the contents of the drums are emptied into one, four cubic-yard dumpster hopper. Empty drums are stored in the northwest corner of the garage, and are then brought back to facilities for reuse.

TRAILER STRIPPING AREA

Four properly closed and labeled used antifreeze totes were observed in the trailer stripping area. In addition, various dumpster hoppers containing used oil filters were observed. At the time of the inspection, the dumpster hoppers containing used oil filters were not covered or otherwise protected from the weather. Facility personnel indicated that the used oil filters located in the dumpster hoppers were in the process of being transferred to roll-offs. Department personnel informed the facility that unless adding or removing filters, the hoppers must be covered or otherwise protected from the weather. At the time of the inspection, the dumpster hoppers were relocated into the covered garage.

DRUM WASH AREA

Older and/or damaged drums that are no longer in use are brought to the drum wash area and are cleaned using a hot water steamer.

RAIL CARS

Five rail cars are leased by HCC, three of which were located on site at the time of the inspection. None of the rail cars on site contained any materials at the time of the inspection. One out-of-service tank (Tank #24) was located adjacent to the rail cars. Facility personnel indicated that the tank caught fire in 2003, and is scheduled to be cleaned and demolished in Quarter Three of 2020.

UNLOADING PAD

Two 40 yard roll-offs and one 30 yard roll-off were observed in the unloading pad area. Each roll-off container was located within the containment area, and no visible cracks or seepage was observed. At the time of the inspection, the roll-offs were not closed or otherwise protected from the weather. Department personnel indicated that the roll-offs must be closed/protected from the weather when not actively loading or unloading the roll-offs.

TANKS

Tanks two, three, four, five, seven, eight, nine, and ten are located in the south farm tank area. These tanks are used as the guard tanks. Tank numbers six, eleven, twelve, C1, C2, C3, and 552 store refined fuel oil product. The central tank farm consists of tank 630 and tank 552. Tank 630 contains oil used to fuel the refining process. The compacter was located adjacent to the central tank farm and is vacuumed out when necessary. All tanks were observed to be appropriately labeled (e.g., used oil, petroleum contact water, etc.) and well maintained.

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WASH PAD

After refining, finished product (No. Five fuel oil) is sent for shaking in the wash pad area, and then is stored in a designated tank. The oil will then be sent to Indianapolis for further refining or will be sold locally.

TRUCK STAGING AREA

Several vacuum trucks were located in the truck staging area. One truck's sump pump was approximately three quarters full at the time of the inspection, and one 1993 vacuum truck was out of service. Facility personnel indicated that at the time of the inspection, the truck was parked there due to a lack of open parking spaces on the property and is usually parked within the loading pad area. At the time of the inspection, Department personnel explained that the tanker truck must be located on the unloading pad and cannot be storing used oil in the parking lot area for more than 24-hours. Following the inspection, photo documentation of the tanker truck located within the loading pad area was received via email on December 20, 2019. Two, twenty-yard roll-offs were present in this area as well. One roll-off contained cleaned carts, and the other contained scrap metals.

PLANT MAINTENANCE SHED

The maintenance shed consisted of two drums of product degreaser labeled corrosive, as well as product paints and coating used for the containment areas. Paints are bought as needed. One empty dumpster hopper was located in this area as well.

REFINERY SLAB

Used oil in Tank 630 is piped to the oil processing area to feed the furnace. When the oil first enters the processing area, it goes through an atmospheric distillation column, then through a vacuum distillation column, and finally it is pumped to Tank 30 KV. The processed used oil is then transferred from Tank 30 KV to Tank 552, where it is sampled and tested to verify that it meets the used oil on-specification criteria. After the oil has met all of the on-specification criteria, the oil in the tank is pumped to either the truck or rail car for shipment, or for further blending. Two primary re-processed fuel products are produced from the refining process: fuel oil that is equivalent to No. Five Fuel Oil and flotation oil for the phosphate mining industry.

LAB

The electronic "long sheet" located in the control room section of the lab tracks incoming truck shipments. Emergency coordinator contact information was posted in a visible area on the wall in the control room. Labeled used oil samples are maintained in the cabinets two, three, and four in the lab. Cabinet one contains product.

RECORDS REVIEW

Records of inspections of the facility, tank systems, containment, yard, etc., were reviewed and appear to be current and in accordance with the permit requirements. Used oil shipping records for 2017 through 2019 were spot checked, and the facility appears to be recording all required information. The facility's non-conforming log was reviewed and appeared to be up to date. A copy of the WAP and SPCC plan was located at the facility. A valid registration form and ID number was posted in a prominent place (offices building) in the facility. Tracking to ensure that 95% of maximum capacity is not exceeded was implemented and up to date. The Department requested copy of the following documents via email on December 18, 2019: WAP, SPCC plan, Contingency Plan, documents containing arrangements made with local authorities, and documents from the nonconforming log as discussed on site. On December 20, 2019, facility personnel provided all requested information. A review of the submitted documents were reviewed and appear adequate.

PHOTO ATTACHMENTS:

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Properly labeled tanks and compacter area



Conclusion:

Heritage Crystal-Clean, LLC appears to be operating in compliance with the associated used oil permit (permit #30676-010-HO) as well as applicable rules and regulations.

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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.

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

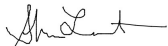
Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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

Shannon Lenhart	Inspector
Principal Investigator Name	Principal Investigator Title
	FDEP-SWD
Principal Investigator Signature	Organization
	01/08/2020
	Date
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Shannon Kennedy	Environmental Manager
Inspector Name	Inspector Title
	FDEP-SWD
	Organization
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Tony Piotrowski	Facility Manager
Representative Name	Representative Title
	Heritage Crystal Clean, 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: Shannon Kennedy **Inspection Approval Date:** 01/09/2020