Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Water Recovery LLC

On-Site Inspection Start Date: 08/18/2020 **On-Site Inspection End Date:** 08/18/2020

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

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

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

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

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Used Oil:** On-Spec, Off-Spec, Used Oil, Oil Filters, Processor **Other:** Both **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Contaning Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: Eddie Maylon, General Manager

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

NAIC: 562219 - Other Nonhazardous Waste Treatment and Disposal

TYPE OF OWNERSHIP: Private

Introduction:

Water Recovery, LLC (WR, the facility) was inspected August 18, 2020, as a hazardous waste compliance inspection. WR's last hazardous waste inspection conducted by the Department was on July 24, 2018. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste. The facility notified as a Very Small Quantity Generator on March 3, 2020, in conjunction with their annual used oil activity registration documents. At the time of inspection, the facility was operating under Used Oil Processing Facility Operating Permit 79677-012-HO which expired on October 11, 2020. Used Oil Processing Facility Operating Permit 79677-013-HO was issued September 3, 2020 and expires October 11, 2025.

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 25 employees and is connected to city water and sewer.

WR's facility includes offices, a Laboratory Trailer, a Tool Room, a Dry Storage Area, a Maintenance Shed, a

Used Oil/PCW Processing Area (black tank farm), a Wastewater Processing Area (green tank farm), a Solid Waste Solidification Area, Non-hazardous Wastewater Tanks and Landfill Leachate Wastewater Tanks. Edward Maylon, General Manager, and Amanda Kimball, Assistant General Manager, were present throughout the inspection. Nicole Neumann, Laboratory Supervisor, was present throughout the Laboratory portion of the inspection.

Process Description:

Laboratory Trailer (Laboratory)

The Laboratory is located in a small trailer next to the Wastewater Processing Area described below. The laboratory sink drains to a tote that is pumped to the Wastewater Processing Area, described below. 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 (Photo 1). A fingerprint analysis checks for total organic halogens, pH, color, odor, total suspended solids, flashpoint and quantity of waste. The Laboratory uses the Dexsil Hydroclor-Q or Dexsil Chlor-D-Tect Q4000 to analyze for total organic halogens. In-date test kits were available in the lab. 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 Laboratory 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. Toluene is used for oil distillations if the Hydroscout test kit results are questioned. Spent toluene is recycled through distillation in the Laboratory. 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, total suspended solids and flashpoint do not require any reagents and do not generate any hazardous waste.

Wastewater must be tested prior to discharge at the frequencies required by the facility's JEA Industrial User Discharge Permit. The Laboratory analyzes wastewater for total nitrogen, total phosphorus, chemical oxygen demand (COD), trace metals (antimony, arsenic, cadmium, chromium, cobalt, lead, mercury, molybdenum, nickel, silver, tin, titanium dioxide, zinc), oil products, pH and total suspended solids. Nitrogen, phosphorus and COD are analyzed 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. Nitrogen/phosphorus vials generate a D002 hazardous waste when spent. COD vials generate a D002/D007/D009/D011 hazardous waste when spent. There was one 5-gallon satellite container of spent nitrogen and phosphorus vials accumulating (Photo 2) and two 5-gallon satellite containers of spent COD vials accumulating. The facility generates approximately two 5-gallon containers of each waste stream per year.

The Laboratory analyzes wastewater samples prior to discharge for trace metals using an Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). On rare occasions an outside facility’s waste may be analyzed in the machine, but this has not occurred in the recent past. Wastewater samples are acidified with nitric acid. The ICP-OES generates approximately 410 ml of waste per day and operates 5 days per week. Per the Laboratory Supervisor, the liquid waste pH ranges from 1-2. There was one, approximately 3-gallon container present to collect ICP-OES waste liquid (Photo 3). Waste was in the process of being generated by the machine, so there was no waste accumulating at the time of inspection. Liquid waste is neutralized on a daily basis in the container and disposed of in the Laboratory sink. The sink drains to a tote that is pumped to the Wastewater Processing Area, described below. Treatment of hazardous wastes that are hazardous because they exhibit only the corrosivity characteristic is permitted in an elementary neutralization unit under 40 CFR 270.1(c)(2)(v) and 40 CFR 264.1(g)(6). However, the facility has not performed an accurate hazardous waste determination to verify that the waste is hazardous only for corrosivity [40 CFR 262.11]. Because the 3-gallon container and tote are not considered tanks or ancillary equipment, they would not meet the definition of a wastewater treatment unit. Total suspended solids and pH testing do not require reagents and do not generate hazardous waste.

The Laboratory collects used oil and oily wastewater generated from samples in a 5-gallon container labeled as “Used Oil” (Photo 4). When the container is full, the liquid is processed by the facility. The facility has a trash can labeled “oily waste” for collection of solid wastes contaminated with oil such as gloves, towels, empty containers, etc. The waste is disposed of as non-hazardous waste.

The Laboratory uses Alconex (sodium tripolyphosphate 12-28%, sodium alkylbenzene sulfonate 8-22%, tetrasodium pyrophosphate 2-16%, pH 9.5 (at recommended solution) to clean glassware.

Process Description:

(Continued)

Tool Room (Maintenance Shed on previous report)

The Tool Room is a small building located adjacent to the Used Oil Processing Area, described below, where materials are stored and where staff may perform small repairs and general maintenance (Photo 5). Facility staff perform small painting operations out of this building. The facility typically contracts out tank painting and other larger jobs. There was no hazardous waste, used oil or used oil filters accumulating in this area at the time of inspection. The facility is reminded that some of the coatings stored in the Maintenance Shed may generate a hazardous waste when disposed of and that a hazardous waste determination should be conducted prior to disposal of any non-empty containers or rags or brushes contaminated with coatings.

Spent lead acid batteries generated from changing out truck batteries on occasion would be stored in this area. There were no spent lead acid batteries accumulating at the time of inspection. When generated, spent lead acid batteries are returned to the retailer for core exchange.

Dry Storage Area

The Dry Storage Area is a roofed structure where equipment is stored and light maintenance work is performed (Photo 6). Aerosol cans of WD-40 and Electra Coat (xylenes 15-40%, hexane 15-40%, petroleum gases 15-40%, styrene butadiene polymer 10-30%; flashpoint -136°F) are routinely used by maintenance staff directly on equipment. Rags are not used with these products. A drum top aerosol can puncturing device has been installed in this area since the last inspection (Photo 7). Aerosol cans are punctured and the liquid is drained into a 55-gallon drum. Empty cans are disposed of as scrap metal. The drum was less than 25% full. Aerosol can liquid waste has yet to be disposed of. Liquid generated from puncturing and draining non-empty aerosol cans of Electra Coat generates a D001 hazardous waste. Aerosol cans of WD-40 generate non-hazardous liquid waste when punctured and drained. The facility is reminded to perform a hazardous waste determination on any additional non-empty aerosol cans that may be used on a non-routine basis.

Adjacent to the Dry Storage Area are two shipping containers used for storage. Spent fluorescent lamps generated by maintenance staff replacing facility lamps are stored in one of the shipping containers. There were three boxes of spent lamps accumulating at the time of inspection. The boxes were not full. The boxes were not properly labeled [40 CFR 273.14(e)], were not marked with an accumulation start date [40 CFR 273.15(c)] and were not closed [40 CFR 273.13(d)] (Photo 8). The facility properly labeled, marked and closed the boxes at the time of inspection. Spent lamps are transported to WR’s parent company, Moran Environmental Recovery, for management as universal waste. The facility is reminded that a person only collecting spent lamps from generators of 10 or less spent lamps per month and who does not accumulate more than 100 kg of lamps at one time, is not required to register with the Department, as specified in 62-737.400, FAC. Those not meeting these requirements may be required to register. In addition, trucks used for transport of spent lamps should comply with Department of Transportation requirements, be totally enclosed and in good condition and have emergency cleanup and containment procedures in the vehicle. Emergency procedures should also be maintained at the handler or transporter facility.

Maintenance Shed (Old Laboratory Trailer on previous report)

The Maintenance Shed, located west of the Used Oil Processing Area, is a small trailer where tools and miscellaneous equipment are stored (Photo 9). This area does not accumulate or generate any hazardous waste. The sink inside the trailer drains to the secondary containment for the Used Oil/PCW Processing Area,

described below. The facility is reminded that only handwashing water may be discharged from this sink.

Used Oil/PCW Processing Area

The facility receives shipments of used oil and PCW in drums, totes or tanker trucks. The Used Oil Processing Area includes Tanks 1P-3P (23,232-gallons each, used oil), Tank 4P (21,445-gallons, used oil), Tank 5P (20,778-gallons, used oil), Tank 6P (25,806-gallons, used oil), Tank 7P (21,446-gallons, Petroleum Contact Water (PCW)), Tank 8P (21,446-gallons, industrial wastewater/petroleum products), Tank 9P (20,833-gallons, industrial wastewater/petroleum products), Tank 10P (10,000-gallons, used oil/PCW), Tank 11P (500-gallons, used oil), Tank 1SW (30,000-gallons, stormwater) and a heater. Tanks 1P -10P and SW1 are located on the north side of the facility and are primarily painted black (Photo 10). Tank 10P is currently empty and being prepared for conversion from a used oil tank to a PCW tank, in accordance with the new permit. Tank 11P is located on the south side of the facility and is associated with an oil-water separator.

In addition to the permitted tanks described above, 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. It was determined that these tanks did not need to be incorporated into the permit. The small tank adjacent to the tote storage area contains product fuel for plant use.

Used oil and oily wastewater are accepted and transferred to the black side tanks for either storage or stationary settling for a period of hours to 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. There have been no solids/sludge removed from the used oil or industrial wastewater tanks in the past three years. The facility is reminded that a hazardous waste determination should be conducted each time solids/sludge are removed from the tanks for disposal.

PCW is recovered by stationary separation and accumulated in Tank 7P, and following the new permit issuance, 10P. 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. Previous results have indicated the waste is non-hazardous, however, results obtained April 30, 2019, indicated the waste was a D018 hazardous waste. Due to these unexpected results, the facility notified the Department of an unplanned episodic event and provided the state 8700-12FL form on May 8, 2019. The event occurred May 3-13, 2019, and resulted in the generation of 275-gallons of D018 hazardous waste. The facility followed up with a full accounting of the event and a federal 8700-12 form, that included the episodic generator addendum, on June 21, 2019. The facility is reminded that notification must be provided within 72-hours of unplanned episodic events or no later than 30 days prior to planned episodic events. In addition, a tank cleanout is an event that would be anticipated and should be considered a planned episodic event.

All black side tanks were labeled “Used Oil” or “Petroleum Contact Water,” as applicable, and located in a secondary containment area capable of containing 110% of the volume capacity of the largest tank. The tanks and secondary containment area appeared to be in good condition. The General Manager stated that the area is routinely inspected and repairs are typically required approximately every 5-6 months. Repairs are made upon discovery. Safety, spill and decontamination equipment appeared to be in order.

Used Oil Processing Records

A review of the used oil acceptance records revealed that the full fingerprint analysis, including halogen screening, is performed and documented on each incoming sample. The analysis is documented on the waste manifest. The generator name/address/EPA ID, transporter name/address/phone/EPA ID, type code, quantity of used oil and date of acceptance are documented in a used oil tracking spreadsheet. The waste stream approval number and off load tank number are documented in the MAST electronic database.

WR markets used oil from the black side tanks (except tanks 2-P, 7-P and 10P following permit issuance) 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 would be checked for total organic halogens, lead,

chromium, cadmium, arsenic, flashpoint and quantity. However, the facility is currently not shipping to used oil burners. Outgoing shipments to used oil marketers and processors are checked for total organic halogens, flashpoint, quantity and percent water. Records of this analysis, along with the transporter name/address/phone/EPA ID, processor (destination) name/address/EPA ID, end use code and quantity of used oil are maintained in the MAST electronic database. Used oil typically remains on-site for approximately one week.

Weekly tank and surrounding area inspection logs were reviewed and appeared to be in order. A copy of the registration was posted in the office.

PCW Records

Written certification is obtained from each transporter on the waste profile as to 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 to be in order and included the producer name/address, transporter name/address, date of receipt and volume received in a spreadsheet. Copies of the manifests are also maintained. PCW typically remains on-site for 1-2 weeks. All sales transactions are recorded on a WR “Retail Oil Sale Tracking Form” and in the MAST electronic database. Outgoing shipments of PCW to marketers and processors are checked for total organic halogens, flashpoint, percent water and quantity. Weekly tank inspection logs were reviewed and appeared to be in order.

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 12). 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. The discharge and equalization tanks 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; discharge and equalization (EQ) tanks, 50,000 gallons each. The green tank system is a unilaterally interconnected loop.

Wastewater is initially pumped to the EQ tank. If additional treatment is required, it would be directed to Tanks 1W-9W. The wastewater tanks allow WR to tailor treatment to a specific batch. In Tanks 1W-9W, 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.

Wastewater requiring further treatment with oil/water separation and/or Dissolved Air Flotation (DAF) is directed into the EQ Tank. Wastewater in the EQ tank is air mixed and gravity fed into the DAF unit (Photo 13) and/or the oil/water separator for additional treatment, prior to direction into the Discharge Tank. The DAF unit has been replaced since the previous inspection. The DAF adjusts pH and performs continuous chemical precipitation and solids removal. The oil/water separator skims off any oil which is accumulated in Tank 11P and then piped to the black side tank 2-P for heat and chemical treatment. Water in the final Discharge Tank may be redirected into the EQ Tank for further treatment as needed or discharged to the POTW. There are two city sewer compliance sampling points. Sampling point SP001 is located outside the main security fence at the corner of East Bryan Street and Albert Street (Photo 14) and sampling point SP002 is located in a small building adjacent to the north side of the used oil processing black tank farm (Photo 15).

A plate-and-frame filter press located above the DAF removes sludge, residue and by-products from the wastewater. A filter media is no longer required. The generated filter cake is accumulated in a tote and added to the Solid Waste Solidification Area described below, before being sent off-site as non-hazardous waste for disposal in Chesser Island Landfill in Georgia. 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, however, the Method Detection Limits for 2,4-dinitrotoluene, hexachlorobenzene and hexachlorobutadiene for the sample collected December 4, 2019, were above the regulatory limits. Therefore, a complete hazardous waste determination did not occur [40 CFR 262.11].

Truck Clean-out Holding Pit

A Truck Clean-out Holding Pit was formally located across East Bryan Street (Photo 16). In the past, customers

could clean-out their trailers of non-hazardous waste into the holding pit for disposal by WR. The liquid was pumped to the other side of the street for processing. The solids were added to the Solid Waste Solidification Area pits before being sent off-site for disposal in Chesser Island Landfill as non-hazardous waste. The Truck Clean-out Holding Pit was decommissioned November 15, 2018, when it was emptied and the sludge was added to the Solidification Area pits for disposal as non-hazardous waste. When it was in operation, the facility analyzed the truck clean-out solids quarterly for TCLP metal, semi-volatile and volatile constituents. Results, including the results obtained just prior to final disposal on November 6, 2018, have indicated the waste is non-hazardous. Trucks are now cleaned out directly into the Solid Waste Solidification Area, described below. The area is now used for equipment storage.

Solid Waste Solidification Area

A large, two-pit Solid Waste Solidification Area is also located across Bryan Street (Photo 17). The pits are used to solidify other facility's non-hazardous waste streams. In addition, WR process wastes, including the wastewater filter cake and formally generated truck clean-out solids, are also added to the pits. This solidification media consists primarily 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 Chesser Island Landfill. Approximately 20 tons of waste is transported approximately daily.

The facility uses generator knowledge and/or analytical data (depending on the waste stream) provided by the customer in their waste profile to verify that a waste stream accepted for solidification is non-hazardous. Routine waste streams would only be required to be re-analyzed after the initial shipment if there were changes to the waste profile. The facility also currently analyzes the Solid Waste Solidification Area sludge quarterly for TCLP metal, semi-volatile and volatile constituents. Records of the results of the quarterly TCLP analysis were reviewed since the previous inspection. Samples collected on September 28, 2018, November 6, 2018, September 13, 2019, March 10, 2020, and August 13, 2020 indicated the waste was non-hazardous. The method detection limits were above the regulatory limits for 2,4-dinitrotoluene, hexachlorobenzene and hexacholorbutadiene for the samples collected on February 13, 2019, June 27, 2019, and December 2, 2019. Therefore, a complete hazardous waste determination was not conducted [40 CFR 262.11]. The results obtained on June 17, 2020 for the sample collected on June 4, 2020, indicated that there was 0.39 mg/L of 2,4-dinitrotoluene present in the sample. Because the waste contained 2,4-dinitrotoluene in a concentration greater than the regulatory limit of 0.13 mg/L, the waste was a D030 hazardous waste. Records indicate 26.48 tons of this waste stream were shipped on a non-hazardous manifest and improperly disposed of as non-hazardous waste in Chesser Island Landfill on June 5, 2020, [40 CFR 262.20(a)(1)]. The facility did not perform an accurate hazardous waste determination on this waste stream [40 CFR 262.11] and did not determine if the waste had to be treated prior to land disposal [40 CFR 268.7(a)(1)]. The Lab Supervisor stated during a phone call following the inspection that the exceedance was missed.

After the exceedance was brought to the facility's attention, attempts were made by the facility to determine the potential generators of the waste. It was determined that there were two customer waste streams in the solidification pits at the time of disposal. The Lab Supervisor stated that the first waste stream is generated from tank clean-out operations of a Large Quantity Generator chemical manufacturing plant and has been received on approximately four occasions since the original profile date. The waste is offloaded via tanker truck into the pit. The profile and TCLP analysis for metal, volatile and semi-volatile constituents dated November 26, 2018, indicated the waste stream was non-hazardous. The facility received another load of this waste stream following the inspection on September 11, 2020, and held the waste for testing. This TCLP analysis for metal, volatile and semi-volatile constituents also indicated the waste stream was non-hazardous.

The Lab Supervisor stated that the generator of the second waste stream was not a regular customer and that the waste came through a broker. This waste stream included three drums of lab-packed expired/un-needed, non-hazardous lab chemicals generated by a VSQG laboratory. The individual containers were emptied into the pit. The profile and lab-pack inventory sheet dated May 2020 indicated the waste stream was non-hazardous.

The Lab Supervisor stated that during review of their records they also tried to identify additional suspect waste streams that, although unlikely, could have been present in residual quantities in the Solidification Area at the time the waste was disposed of. One such waste stream was identified. This waste stream consists of filter press solids generated by the treatment of wastewater from a Small Quantity Generator (SQG) gun manufacturer. This waste stream is received approximately 2-4 times per month. The profile, dated November 14, 2019, indicated the waste stream was non-hazardous based on generator knowledge. The facility received

another load of this waste stream on September 18, 2020, and held the waste for testing. The TCLP analysis for volatile and semi-volatile constituents also indicated the waste stream was non-hazardous.

Additional information was provided in an email dated October 30, 2020, regarding the improperly disposed waste. The facility estimates that approximately 50% of the total amount of waste transported was the paper dust solidification media. Analysis of the paper dust solidification media itself for TCLP metal, volatile and semi-volatile constituents indicated that the media was non-hazardous. Samples of the Solidification Area are collected from the four corners, two sides and middle of the pit. The samples were collected after the solidification media had been added to the pit, but not mixed in the pit.

Due to the fact that the waste was improperly disposed of, the facility was requested to contact the transporter and landfill in order to notify them of the issue. The facility provided documentation that both the transporter and landfill were notified of the issue on September 16, 2020.

Non-hazardous Wastewater Tanks

There are five tanks used to store non-hazardous wastewater that is solidified in the Solidification Area (Photo 18). There are two 5,000-gallon and one 12,000-gallon previously existing tanks, as well as three new 25,000-gallon tanks that have been added to this area.

Drums of metal-clad used oil filters are stored on a pad between the existing and new Non-hazardous Wastewater Tanks. There were five 55-gallon drums of drained used oil filters accumulating in this area at the time of inspection. The drums were properly labeled, closed, in good condition and stored within the secondary containment structure (Photo 19). Although the facility maintains its registration as a Used Oil Filter Processor, the used oil filters that are received in drums are shipped to Georgia Petroleum for processing. The facility manages approximately 12 drums of used oil filters per year. Paper used oil filters are also occasionally received and maintained in grated boxes equipped with drip pans in a nearby area within the secondary containment. Any oil that collects in the drip pans is pumped out and processed on site. Paper oil filters are disposed of in Chesser Island Landfill. There were no paper oil filters accumulating at the time of inspection. The facility is reminded that used oil filters are prohibited from disposal in Florida landfills.

Landfill Leachate Wastewater Tanks

There are two landfill leachate wastewater tanks (Photo 20) located adjacent to the former Truck Clean-out Holding Pit. The tanks receive tanker trucks of leachate from Nassau County Landfill, Otis Road Landfill or Lake County Landfill. Recovered leachate wastewater is stored in tanks and then discharged under the facility's JEA Industrial User Discharge Permit, 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.

Transportation Activities

WR may transport used oil, PCW, used oil filters or industrial/oily wastewater in tanker trucks or drums to the facility for processing. Drivers screen each load of used oil for halogens prior to transport with the same type of test kits used by the laboratory to screen deliveries to the facility. All drivers receive initial and annual training.

Transportation Activities Records

Training records appeared to be in order. The used oil and PCW acceptance and delivery records described above include transportation records and appeared to be in order.

During a review of the E-manifest system, the inspector discovered three instances where WR (FLR 000 069 062) was listed as the initial transporter for hazardous waste. WR is not a registered transporter for hazardous waste. These three instances included manifest 006450899GBF where 22.1 tons of D002/D007 hazardous waste was transported, manifest 006450893GBF where 25.2 tons of D002/D007 hazardous waste was transported and manifest 014502514JJK where 25.4 tons of D002/D007 hazardous waste was transported. A fourth instance that did not appear in the E-manifest system and that was discovered by the facility included

manifest 006450896GBF where 6,136 gallons of D002/D007 hazardous waste was transported. WR's General Manager stated that these were clerical errors and that the waste was actually transported by Moran Environmental Recovery, LLC (FLD 092 718 576), WR's parent company. The facility provided documentation via an email dated October 23, 2020, that the waste was transported in trucks placarded and decaled as Moran Environmental Recovery, LLC. All drivers are employed by Moran Environmental Recovery, LLC. The facility contacted the receiving facility and asked that the manifests in question be corrected to indicate the correct transporter and EPA identification number. Three corrected paper manifests were provided and two manifests were corrected in the E-manifest system as of the date of this report. The facility provide documentation in an email dated October 30, 2020, that the drivers had been re-trained regarding hazardous waste manifests. This is an Area of Concern.

Other Records

WR is currently operating as a VSQG of hazardous waste for small amounts of lab waste and aerosol cans. The spent nitrogen/phosphorus vial D002 hazardous waste is transported by EQ Industrial Services (MIK 435 642 742) and manifested off-site to US Ecology Tampa, Inc. (FLD 981 932 494). The spent COD vial D002/D007/D009/D011 hazardous waste is transported by AERC Recycling Solutions (FLD 984 262 782) and manifested off-site to AERC Recycling Solutions (PAD 987 367 216). The May 13, 2019, episodic shipment of D018 hazardous waste was transported by Moran Environmental (FLD 092 718 576) and manifested off-site to Waste Management-Emelle (ALD 000 622 464). The last hazardous waste shipment occurred March 3, 2020.

Used oil filter records indicate paper filters are disposed of as non-hazardous waste approximately 1-4 times per year in Chesser Island Landfill. Records indicate metal-clad used oil filters are shipped to Georgia Petroleum 2-4 times per year for processing and were last shipped on June 30, 2020.

Spent fluorescent lamps are transported to Moran Environmental Recovery where they are transported by Freehold Cartage, Inc. (NJD 054 126 164) to Clean Earth of Alabama, Inc (ALD 981 020 894) for recycling. Records indicate that eight pounds of spent universal waste lamps were last transported on April 30, 2019, from Moran Environmental Recovery.

The current DEP used oil registration was posted and the facility has submitted its current certificate of liability insurance. WR has also submitted its 2019 Used Oil and PCW annual report to the Department's Tallahassee office.

A review of WR's other operating records, required inspections and Spill Prevention Control and Countermeasures plan (SPCC)/Contingency Plan appeared to be in order. Attempts to make arrangements with the local authorities are on file. The facility stated that a copy of their Contingency Plan was submitted with the arrangements letters. The facility indicated that it has not had to implement its contingency plan since at least the last inspection.

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Copies of Northeast District's Hazardous Waste Generator Workshop PowerPoint training documents and other workshop files that may be useful can be found here:

ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/SQG%20WORKSHOP/
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For Outstanding Items of Potential Non-Compliance

Please review the following section – New Potential Violations and Areas of Concern. This section includes potential violations observed at your facility during this inspection. For any potential violations below that have not been corrected, please refer to the Corrective Action for each item that is suggested to bring your facility into compliance. Once the corrective action has been completed, please send documentation to the DEP NED inspector listed as the Principal Inspector on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

Areas of Concern:
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1. Transportation Activities – The facility was listed as the initial transporter on four hazardous waste

manifests. The facility indicated this was a clerical error and requested the manifests be updated to reflect the correct name and EPA identification number for the transporter. The facility should ensure that all corrected paper manifests are on file and that the E-manifest system has been updated to reflect the correct transporters. The facility should provide information regarding how errors will be prevented in the future.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Explanation:	The facility did not make an accurate hazardous waste determination for the following waste streams: 1. Laboratory -Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) wastewater. 2. Wastewater Processing Area - Plate and frame filter press solids. 3. Solid Waste Solidification Area - Solidification pit solids.
Corrective Action:	Item 1: In order to return to compliance, the facility should perform and fully document a hazardous waste determination on the ICP-OES wastewater by having the waste stream analyzed by a certified laboratory for the following: - Ignitability, pursuant to 40 CFR 261.21, via method 1010 - Toxicity Characteristic Leaching Procedure (TCLP) for RCRA Metals, pursuant to 40 CFR 261.24, via method 6010 - TCLP for Semi-Volatiles, pursuant to 40 CFR 261.24, via method 8270 - TCLP for Volatiles, pursuant to 40 CFR 261.24, via method 8260 - TCLP for Pesticides, pursuant to 40 CFR 261.24, via method 8081 - TCLP for Herbicides, pursuant to 40 CFR 261.24, via method 8151 A copy of the results of these waste determinations should be submitted to the NED office. None of these wastes are to be disposed of until written approval has been given by the DEP. The waste should be disposed of in a proper manner once written approval has been given by the DEP. Hazardous waste should be sent off-site to a permitted treatment, storage, or disposal facility. NOTE: None of the samples are to be composites. The samples are to be collected and analyzed in accordance with EPA publication SW# 846 “Test Methods for Evaluating Solid Waste” 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, FAC. A National Environmental Laboratory Accreditation Program (NELAP) certified laboratory should analyze the samples. Alternative methods for hazardous waste determinations should be approved by DEP. Items 2-3: In order to return to compliance, the facility should submit proposed written operating procedures within 30 days of receipt of this report to DEP for approval, indicating how the facility will ensure that a full and accurate hazardous waste determination will be completed on all solid waste streams prior to disposal. The facility should immediately implement its operating procedures upon receipt of DEP's approval.

Type:	Violation
Rule:	262.20(a)(1)
Explanation:	The facility shipped 26.48 tons of D030 hazardous waste on a non-hazardous manifest and disposed of it in a RCRA Subtitle D solid waste landfill that was not permitted to accept hazardous waste.
Corrective Action:	In order to return to compliance, the facility should immediately ensure that only non-hazardous waste is accepted for solidification and disposal. The facility should immediately ensure that all hazardous waste generated in excess of the VSQG quantity limits is shipped using a hazardous waste manifest (EPA Form 8700-22) and that all hazardous waste generated is shipped to a facility permitted to handle and accept the hazardous waste. The facility should submit proposed written operating procedures

	within 30 days of receipt of this report to DEP for approval, indicating how the facility will ensure this is accomplished. The facility should immediately implement its operating procedures upon receipt of DEP's approval.

Type:	Violation
Rule:	268.7(a)(1)
Explanation:	The facility shipped 26.48 tons of D030 hazardous waste off-site for disposal in a RCRA Subtitle D solid waste landfill without determining if the waste required treatment prior to land disposal.
Corrective Action:	In order to return to compliance, the facility should submit proposed written operating procedures within 30 days of receipt of this report to DEP for approval, indicating how the facility will ensure that wastes prohibited from land disposal without prior treatment will be properly managed. The facility should immediately implement its operating procedures upon receipt of DEP's approval.

Type:	Violation
Rule:	273.13(d)
Explanation:	Dry Storage Area: Three boxes of spent fluorescent bulbs in the shipping container located adjacent to the Dry Storage Area were not maintained closed.
Corrective Action:	No further action is required. The facility returned to compliance by closing the boxes at the time of inspection.

Type:	Violation
Rule:	273.14(e)
Explanation:	Dry Storage Area: Three boxes of spent fluorescent bulbs in the shipping container located adjacent to the Dry Storage Area were not properly labeled.
Corrective Action:	No further action is needed. The facility returned to compliance by properly labeling the boxes at the time of inspection.

Type:	Violation
Rule:	273.15(c)
Explanation:	Dry Storage Area: Three boxes of spent fluorescent bulbs in the shipping container located adjacent to the Dry Storage Area were not marked with an accumulation start date.
Corrective Action:	No further action is required. The facility returned to compliance by marking the boxes with the accumulation start date at the time of inspection.

PHOTO ATTACHMENTS:

Water Recovery LLC Inspection Report

Inspection Date: 08/18/2020

Photo 1

Photo 2

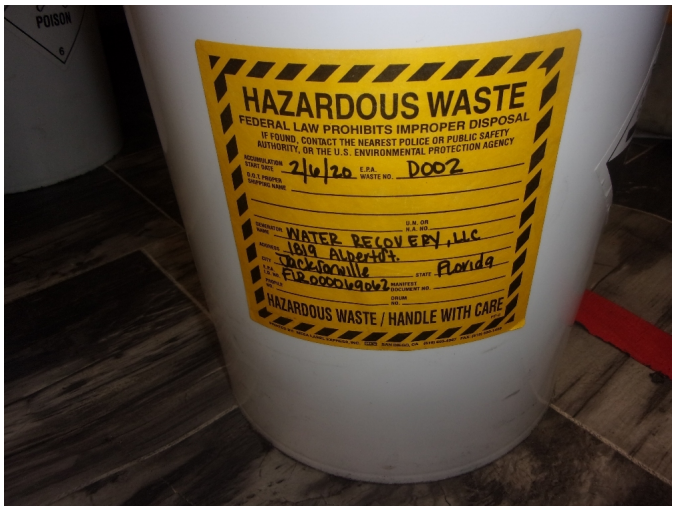

Photo 3

Photo 4

Photo 5

Photo 6

Water Recovery LLC Inspection Report

Inspection Date: 08/18/2020

Photo 7

Photo 8

Photo 9

Photo 10

Photo 11

Photo 12

Photo 13

Photo 14

Photo 15

Photo 16

Photo 17

Photo 18

Photo 19

Photo 20

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 Investigator Name	**Principal Investigator Title**	
B. Bradshaw	DEP	10/30/2020
Principal Investigator Signature	**Organization**	**Date**

Eddie 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:	Bonnie M Bradshaw	**Inspection Approval Date:**	10/30/2020