



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

September 29, 2021

Mr. Bart Snow, President
Sun Coast Environmental, Inc.
405 Mealy Dr.
Atlantic Beach, FL 32233

Sent Electronically: bart@suncoastenv.com

Re: Sun Coast Environmental, Inc.
EPA/DEP ID: FLR 000 064 881
Duval County – Hazardous Waste

Dear Mr. Snow:

Department personnel conducted a compliance inspection of the above-referenced facility on July 20, 2021. Based on the information provided during and following the inspection, the facility was determined to be in compliance. 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 compliance efforts. 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,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry
Environmental Administrator

Enclosure: Inspection Report

cc: Bonnie Bradshaw, Cheryl Mitchell, DEP_NED
Jean Richards, City of Jacksonville EQD - jeanr@coj.net



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

FACILITY INFORMATION:

Facility Name: Sun Coast Environmental Inc
On-Site Inspection Start Date: 07/20/2021 **On-Site Inspection End Date:** 07/20/2021
ME ID#: 56934 **EPA ID#:** FLR000064881
Facility Street Address: 405 Mealy Dr, Atlantic Beach, Florida 32233-6945
Contact Mailing Address: 405 Mealy Dr, Atlantic Beach, Florida 32233-6945
County Name: Duval **Contact Phone:** (904) 241-3111

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Used Oil:** Transporter, Used Oil, Oil Filters

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: Bart Snow, President

LATITUDE / LONGITUDE: Lat 30° 20' 20.1243" / Long 81° 25' 6.4711"

NAIC: 562910 - Remediation Services

TYPE OF OWNERSHIP: Private

Introduction:

Sun Coast Environmental, Inc. (Sun Coast, the facility) was inspected on July 20, 2021, by the Department's Hazardous Waste Program. The facility was last inspected by the Department's Hazardous Waste Program on July 28, 2017. Sun Coast is a registered Used Oil and Used Oil Filter Transporter and operates as a Very Small Quantity Generator (VSQG) of hazardous waste. Mr. Bart Snow, President, was present throughout the inspection.

The facility has been in operation at its present location since 2000 and is connected to city water and sewer. Sun Coast has four employees and operates Monday - Friday from 7:00 am – 3:30 pm. Sun Coast also has an EPA ID number as a contractor on Naval Station Mayport (FLR 000 200 832). That location was not included in this inspection.

Process Description:

Transportation Activities:

The facility may remove oily bilge water, non-hazardous wastewater or used oil from surface ships berthed at Naval Station Mayport (Mayport). Sun Coast pumps the liquids from the ships using a vacuum truck. The liquids are then transported directly to Liquid Environmental Solutions of Florida, LLC (FLD 981 928 484) or Water Recovery, LLC (FLR 000 069 062) for processing. Sun Coast does not take any waste to the facility during transportation. Sun Coast may occasionally transport used oil filters in drums for customers at Mayport. The used oil filter drums are transported directly to Liquid Environmental Solutions.

Shop Area:

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Chemical products, tools and equipment are stored and light maintenance work on company vehicles is performed in the Shop Area (Photo 1). Used oil generated by Sun Coast maintenance activities is drained into a 55-gallon drum (Photo 2). The drum was properly labeled and stored on a spill containment pallet. Used oil filters are collected in a 5-gallon bucket (Photo 3). The drum was properly labeled. Non-hazardous oily rags are collected in a 55-gallon drum. A facility representative stated that solvents/aerosols are not used on rags. The facility does not have a parts washer.

The facility may occasionally conduct wire welding or cut steel with a torch. The facility representative stated that these processes do not generate any waste. Any scrap metal generated is placed into a scrap metal bin located in the Yard, described below, and taken to Berman Brothers for recycling.

The facility may occasionally use touch-up paints on trailers and other equipment. The facility representative stated that no solvents are used. The facility is reminded that a hazardous waste determination should be conducted prior to disposal of any excess or unused paints or solid paint-related material, as they be considered ignitable or contain RCRA toxic constituents.

The facility is also reminded that even when spent, aerosol cans may contain liquid product and/or flammable propellants which can cause the aerosol can to be a D001 and/or other hazardous waste. Additionally, aerosol cans with broken or clogged nozzles may be considered a hazardous waste. Unless an aerosol can is completely empty of both liquid and propellant, as defined in 40 CFR 261.7, it should not be thrown into the trash. All unusable and spent aerosol cans should either be safely punctured and properly drained into a closed container which should then be managed as hazardous waste, or be placed unpunctured into a closed container which should then be managed as a hazardous waste. Alternatively, the facility may choose to manage hazardous waste aerosol cans as a universal waste, provided they meet the requirements of 40 CFR 273.

The facility may clean the inside of corrosion resistant steel pipes from vessels in its Shop Area. The facility uses a solution of hydrofluoric acid and nitric acid which is circulated through the pipe. The resulting solution is reused on different pipes until it is spent, and it is then accumulated in a 55-gallon drum. While being accumulated, caustic soda is added to the spent solution to adjust the pH of the waste. There was one drum, approximately three-quarters full, of spent solution accumulating (Photo 4). The drum was closed, labeled, on a containment pallet and dated February 28, 2019. The facility has determined that the waste as generated is a D002/D007 hazardous waste because it is corrosive and it may contain chromium based on previous analysis. After the pH adjustment, the facility manages this waste as D007 hazardous waste only. Since the facility is a VSQG, then no additional requirements need to be met for the pH adjustment to remain exempt. The facility is reminded that should the generation rate increase to that of a Small Quantity Generator or a Large Quantity Generator, then there may be additional requirements for the treatment activities and/or drums of waste generated. After the solution is circulated through the pipe, the pipe is rinsed with water. Wastewater generated by the rinsing process has been analyzed and was determined to be non-hazardous.

Occasionally, the facility may clean carbon steel pipes using a similar process as that described above. A solution of sulfuric acid is circulated through the pipe and a caustic soda is added to the spent solution to adjust the pH of the waste. Hazardous waste determination records, including previous analysis, indicate this waste exhibits only the corrosivity characteristic. The liquid is managed as non-hazardous wastewater after pH adjustment. This waste was not accumulating at the time of inspection.

The facility may also clean copper/nickel heat exchangers in the Shop Area. A solution of Safe-D-Scale (pH <3) and water is circulated through the heat exchanger from a reservoir. The wastewater, expected to have a pH of less than 2, is collected in the reservoir and neutralized with sodium hydroxide to a pH of approximately 7. Hazardous waste determination records, including previous analysis, indicate this waste exhibits only the corrosivity characteristic. The liquid is managed as non-hazardous wastewater after pH adjustment. This waste was not accumulating at the time of inspection.

Yard:

The facility offers a water purifying service to US Navy vessels. Sun Coast takes the vessel demineralizers (Photo 5) to Mayport to purify the water. To regenerate the demineralizers, Sun Coast returns the vessels to its facility and flushes the cation bed with hydrochloric acid and the anion bed with sodium hydroxide. The two solutions are discharged to a 4,000-gallon poly tank (background of Photo 6) where the wastewater is mixed and neutralized to a pH of between 5-9. The pH is then adjusted to 7.3, allowed to rest for a period of time and then discharged into the city sewer system via flexible hoses. This process is conducted with the permission of the

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City of Atlantic Beach. The facility also stores deionized water onsite in two 3,000-gallon poly tanks (other two tanks in Photo 6).

The facility also offers an engine cooling system cleaning service to US Navy vessels. A solution of ammonium citrate dibasic, Sovchem Detu Crystal (3-diethyl-2-thiourea) and water is heated and circulated through the cooling system, followed by a rinse. Analyticals of both the first circulation and rinsate have indicated this waste is non-hazardous. The liquid is managed as non-hazardous wastewater.

There are six Conex boxes and one shed located in the Yard used for storage of equipment and supplies. The facility also stores one 1,400-gallon vacuum truck, three 1,000-gallon vacuum systems on trailers, three compartmentalized, 6,700-gallon stainless steel tanker trucks, a boat and several other pieces of miscellaneous equipment in the Yard.

Record Review:

At the time of the inspection, Sun Coast was operating as a VSGQ of hazardous waste. The facility is also a Used Oil Generator, a Used Oil Filter Generator, a Used Oil Transporter and a Used Oil Filter Transporter. Sun Coast does not transport Petroleum Contact Water (PCW). Used oil shipping papers, used oil and used oil filter record keeping forms, hazardous waste manifests, hazardous waste determinations and other records are maintained on-site for a period of at least three years.

Hazardous waste is transported by Freehold Cartage, Inc. (NJD 054 126 164) to AES Environmental, LLC (KYD 985 073 196). The last disposal occurred on January 26, 2018, when 500 pounds of D007 hazardous waste was shipped off-site.

Used oil, oily wastewater, used oil filters, oily rags and non-hazardous wastewater are managed by Liquid Environmental Solutions or Water Recovery. Scrap metal is managed by Berman Brothers. Drivers who transport used oil are trained annually. Halogen screening is being performed on each load of used oil with a TIF Z-X1 sniffer. If halogens are detected, further testing is conducted with a Chlor-D-Tect 1000 test kit. Halogen screening is documented on the shipping paper.

The facility's Used Oil Transporter Registration is current and was posted. There is no record, however, that the facility was registered to transport used oil for the period from June 30, 2019 to January 27, 2020. The facility was able to produce a receipt for "Used Oil Handler Registration" on Department letterhead dated March 2, 2019, a credit card receipt indicating that the \$100.00 fee had been paid to the Department on March 2, 2019, and the 2018 annual report, however, the actual registration documentation was not available. This appears to be an administrative error, however, the facility is reminded to maintain all documentation of proper registration for at least three years.

All other records reviewed were found to be in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



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Photo 3



Photo 4



Photo 5



Photo 6



Inspection Date: 07/20/2021

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

Bonnie M Bradshaw	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	09/16/2021
Principal Investigator Signature	Organization	Date
Bart Snow	President	
Representative Name	Representative Title	
	Sun Coast Environmental, 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:	Bonnie M Bradshaw	Inspection Approval Date:	09/16/2021
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