



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

November 8, 2021

Mr. Chuck Nevin, President
IntraCoastal Environmental, LLC
1575 Main Street Suite 5
Atlantic Beach, FL 32233
chuck.nevin@iceresponse24.com

Re: IntraCoastal Environmental, LLC
EPA/DEP ID: FLD984216655
Duval County – Hazardous Waste

Dear Mr. Nevin:

Department personnel conducted a compliance inspection of the above-referenced facility on July 22, 2021, under the authority of Section 403.091, Florida Statutes. 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. 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 Cheryl Mitchell at (904) 256-1620 or via e-mail at cheryl.l.mitchell@dep.state.fl.us.

Sincerely,

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

Joni Petry
Environmental Administrator

Enclosure: Inspection Report

Ec: Luis Pereira, ICE (luis.pereira@iceresponse24.com); Jean Richards, City of Jacksonville
EPD (JeanR@coj.net)
DEP Internal: Joni Petry, Bonnie Bradshaw, Cheryl L. Mitchell, DEP_NED



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

FACILITY INFORMATION:

Facility Name: IntraCoastal Environmental LLC
On-Site Inspection Start Date: 07/22/2021 **On-Site Inspection End Date:** 07/22/2021
ME ID#: 33046 **EPA ID#:** FLD984216655
Facility Street Address: 1575 Main St Ste 5, Atlantic Beach, Florida 32233-6938
Contact Mailing Address: 1575 Main Street Ste 5, Atlantic Beach, Florida 32233
County Name: Duval **Contact Phone:** (904) 435-0758

NOTIFIED AS:

Non-Handler, Used Oil

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

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector
Other Participants: Chuck Nevin, President

LATITUDE / LONGITUDE: Lat 30° 20' 17.616" / Long 81° 25' 16.3585"

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

IntraCoastal Environmental, LLC (ICE, the facility) was inspected on July 22, 2021. The facility was last inspected by the Department's Hazardous Waste Program on January 23, 2018. The facility is a registered Used Oil and Used Oil Filter Transporter and a Very Small Quantity Generator (VSQG) of hazardous waste. ICE's Mr. Chuck Nevin (President) and Mr. Luis Pereira (Chief Operating Officer) were present during the inspection.

ICE is an environmental services company that offers industrial and marine services and emergency spill response. ICE has approximately 20 employees and operates Monday through Friday from 8:00 AM to 5:00 PM and is on-call 24/7 to perform emergency response services. ICE has been in operation for 20 years. The facility is connected to city water and sewer. The facility consists of a main building with administrative offices and Maintenance Shop and Storage Yard.

Used Oil Transporter: Used oil collected from customers is not stored at the facility. When transported, used oil is taken directly from the generator's facility to Water Recovery, LLC (Water Recovery, FLR000069062) for processing. **Used Oil Filter Transporter:** Used oil filters are only collected from ICE's fleet and not from customers but ICE maintains transporter registration in case a customer requires that service. Used oil filters are taken to Water Recovery for processing.

Process Description:

MAINTENANCE SHOP:

The shop area is a two bay garage that is used to store products, tools, and equipment. One bay is used to perform minor vehicle maintenance work. Used oil and used oil filters are collected in 55-gallon drums located inside the shop (Photo 1). The drums were closed, properly labeled and located inside the center of the building

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such that adequate secondary containment was maintained. Spent antifreeze is collected in a 55-gallon drum and recycled through Water Recovery. Technicians use aerosol lubricants and penetrants on shop rags that are collected in a 5-gallon step can and managed as Excluded Solvent Contaminated Wipes (ESCW) and disposed in the trash. There was one container of wipes accumulating in this area (Photo 2). The container was closed and properly labeled as "Excluded Solvent-Contaminated Wipes" on the outside of the container and the inner plastic liner was also labeled. Spill absorbent is reused until it no longer absorbs drips and leaks and is disposed of as non-hazardous waste. Aerosol cans are punctured in a drum-top puncturer attached to a 55-gallon satellite drum (Photo 3). The drum was closed and properly labeled. Aerosol can puncturing is a new process and no waste has been disposed. The facility is reminded that a waste determination should be performed prior to disposal by either sampling the waste or maintaining an inventory log of all aerosol cans punctured.

STORAGE YARD:

The facility stages large equipment and vehicles in an open, unpaved area adjacent to the Maintenance Shop. ICE operates thirteen vacuum trucks, seven tanker trailers, two stakebed/lift gate trucks and ten service pickup trucks. No waste is generated in this area.

SECURITY

The facility is surrounded by a chain link fence topped with barbed wire. Sections of the fence that were inspected appeared to be in good condition. The facility is accessed through a single entrance road that can be secured to prevent unauthorized entry when the facility is closed.

RECORDS REVIEW:

ICE is currently operating as a Used Oil and Used Oil Filter Transporter and a Very Small Quantity Generator (VSQG) of hazardous waste. Records reviewed included used oil and used oil filter manifests and logs, annual transporter registration, insurance liability coverage, and personnel training. All records reviewed appeared to be in order unless otherwise described herein.

ICE performs halogen screening on each load of used oil prior to transport with a hand-held halogen detector, and Dexsil Clor-D-Tect kits are used if the detector registers a contaminant. ICE records the results of the screening as "Pass" or "P" on the manifest and will reject any used oil that has results greater than 1,000 ppm. ICE maintains used oil records for used oil it transports but the records were incomplete and did not include all the required information including the type code and end use code [62-710.510(1), FAC]. Two used oil manifests, one in 2020 and one in 2021, exceeded 24-hours between pick-up on a Friday and delivery to Water Recovery the following Monday. This is an Area of Concern. The facility is reminded that a Used Oil Transporter cannot store used oil for more than 24 hours unless it is a registered Used Oil Transfer Facility and complies with 40 CFR 279.45. ICE should ensure that it only transports used oil that can be delivered to the disposal / processing facility within 24-hours of collection.

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

VSQGs use this link: <ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/SQG%20WORKSHOP/>
and Transporters use this link: <ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/TRA%20WORKSHOP/>

Please note that you cannot access this site using Chrome so you will have to use another browser such as Edge, Firefox, Internet Explorer, etc.

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 Principal Inspector listed on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of

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corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.510(1)
Explanation:	The facility failed to maintain all the required information on the used oil it transports including the type code and end use code.
Corrective Action:	<p>In order to return to compliance, the facility should ensure that it maintains complete records with all the required information including the following:</p> <ul style="list-style-type: none"> (a) The name, business address, telephone number and EPA identification number of the transporter; (b) The source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one; (c) The total number of gallons of used oil received from each source; (d) The type of used oil received, using the type code designation; (e) The date of receipt; (f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



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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

Cheryl L Mitchell	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	10/05/2021
Principal Investigator Signature	Organization	Date
Luis Pereira	Chief Operating Officer	
Representative Name	Representative Title	
	IntraCoastal Environmental, 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:	Cheryl L Mitchell	Inspection Approval Date:	10/05/2021
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