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

January 4, 2023

Sent electronically to: emaylon@wrijax.com

Mr. Eddie Maylon, General Manager
Water Recovery, LLC
1819 Albert St.
Jacksonville, FL 32202

Re: Compliance Assistance Offer
Water Recovery, LLC.
EPA/DEP ID: FLR 000 069 062
Duval County – Hazardous Waste

Dear Mr. Maylon:

A compliance inspection was conducted at your facility on September 6, 2022, under the authority of Section 403.091, Florida Statutes. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Specifically, potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapters 62-730 and 62-710, Florida Administrative Code, was observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the 'New Potential Violations and Areas of Concern' and respond within 30 days of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a time schedule describing how/when the issue will be addressed;
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit your facility to discuss the Areas of Concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond appropriately may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Bonnie Bradshaw of the Northeast District Office at 904-256-1638 or via e-mail at bonnie.bradshaw@FloridaDEP.gov. We look forward to your cooperation in this matter.

Sincerely,

Joni Petry
Environmental Administrator

Enclosure: Inspection Report

cc: FDEP-NED: Bonnie Bradshaw, Cheryl Mitchell, DEP_NED
Water Recovery: Amanda Kimball – akimball@wrijax.com
Nicole Neumann – nneumann@wrijax.com
COJ: Jean Richards – jeanr@coj.net

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Water Recovery LLC

On-Site Inspection Start Date: 09/06/2022 **On-Site Inspection End Date:** 09/06/2022

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, Processor **Other:** Both **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Containing 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 Marketer Facility
Routine Inspection for Used Oil Generator Facility
Routine Inspection for VSQG (<100 kg/month) Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: Amanda Kimball, Assistant 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 September 6, 2022, as a hazardous waste compliance inspection. WR's last hazardous waste inspection conducted by the Department was on August 18, 2020. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste. The facility notified as a Very Small Quantity Generator on January 14, 2022, in conjunction with their annual used oil activity registration documents. The facility is operating under Used Oil Processing Facility Operating Permit 79677-013-HO which 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. Amanda Kimball (Assistant General Manager), Nicole Neumann (Laboratory Supervisor) and Emma Sacchitello (DEP) were present throughout the inspection. Edward Maylon (General Manager) was present during the out-brief.

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. A fingerprint analysis checks for total organic halogens, pH, total suspended solids, flashpoint and quantity of waste. The color and odor parameters were removed from the permit and are no longer evaluated. 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. Spent COD and nitrogen/phosphorus vials are accumulated together in 5-gallon containers and managed as D002/D007/D009/D011 hazardous waste. There were two 5-gallon satellite containers of spent vials accumulating (Photo 1). The facility generates approximately one 5-gallon container every 3-4 months.

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 5-gallon container of ICP-OES waste liquid accumulating. 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). Toxicity Characteristic Leaching Procedure analysis for RCRA metals, volatiles, semi-volatiles, pesticides and herbicides conducted approximately quarterly since the previous inspection has indicated the liquid only exhibits the corrosivity characteristic. 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.” 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 in the Solid Waste Solidification Area, described below, 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

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. Facility staff perform small painting operations out of this building. The facility typically contracts out tank painting and other larger jobs. Painting is conducted with either aerosol cans, brushes or rollers. Cleanup of brushes and rollers is conducted with only water. Wastewater is treated in the Wastewater Processing Area, described below. Aerosol cans are punctured and drained in the Dry Storage Area, described below. There was no hazardous waste or used oil 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.

Oily wipes and absorbents are generated by facility maintenance operations. Wipes and absorbents are accumulated in a 55-gallon drum located outside and adjacent to the Tool Room. The wipes/absorbents are managed as non-hazardous waste and disposed of in the Solid Waste Solidification Area, described below.

Spent lead acid batteries generated from changing out truck batteries 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 2). Aerosol cans of WD-40 are routinely used by maintenance staff directly on equipment. Electra Coat (xylenes 15-40%, hexane 15-40%, petroleum gases 15-40%, styrene butadiene polymer 10-30%; flashpoint -136°F), CRC Lectra Clean (tetrachloroethylene 90-100%) and CRC Disc Brake Quiet were observed during the inspection and may be occasionally sprayed directly on equipment. Products are not used with wipes. Aerosol cans are punctured and the liquid is drained into a 55-gallon drum (Photo 3). 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 and liquid generated from puncturing and draining non-empty aerosol cans of Electra Coat generates a U210 hazardous waste. Aerosol cans of WD-40 and Disc Brake Quiet generate non-hazardous liquid wastes 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, as well as on any rag used with solvents or aerosol products.

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 12 spent lamps that had been accumulating since May 4, 2021 [40 CFR 273.15(a)] (Photo 4). 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

The Maintenance Shed, located west of the Used Oil Processing Area, is a small shed where tools and miscellaneous equipment are stored (Photo 5). The previous trailer was replaced with a wooden shed. This area does not accumulate or generate any hazardous waste. There is no longer a sink inside the Maintenance Shed.

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, 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 6). 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 7). B1, B2 and B3 are used to offload small containers of industrial wastewater, such as totes, since 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 by Department permitting staff 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 two 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 now 10P (Photo 8). 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 tanks. Previous results have indicated the waste is non-hazardous, however, results obtained April 30, 2019, indicated the waste was a D018 hazardous waste and was managed as an episodic event. 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 typically an event that would be anticipated and should be considered a planned episodic event. Solids have not been removed from the tanks since 2019.

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 Assistant General Manager stated that the area is routinely inspected and repairs are typically required every few 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) 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 as well as in shipping documents. 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 with 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 9). 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 and/or the oil/water separator for additional treatment, prior to direction into the Discharge Tank. 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 and sampling point SP002 is located in a small building adjacent to the north side of the used oil processing black tank farm.

A plate-and-frame filter press located above the DAF removes sludge, residue and by-products from the wastewater. A filter media is not 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. Records of the results of the quarterly TCLP analysis were reviewed since the previous inspection. Results have indicated the waste is non-hazardous.

Solid Waste Solidification Area

A large, two-pit Solid Waste Solidification Area is also located across Bryan Street (Photo 10). The pits are used

to solidify other facility's non-hazardous waste streams. Trucks which contained non-hazardous waste may be washed out directly into the pits. In addition, WR process wastes, including the wastewater filter cake, oily rags/absorbents and stormwater from the East Bryan Street side secondary containment are also added to the pits. TCLP analysis for each solidification media has indicated that the media are non-hazardous. 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. Results have indicated the waste is non-hazardous.

Drums of metal-clad used oil filters are stored on a secondary containment pad north of the Solid Waste Solidification Area. There was one 55-gallon drum of drained used oil filters accumulating in this area at the time of inspection. The drum wasproperly labeled, closed, in good condition and stored within the secondary containment structure (Photo 11). 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 20 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.

Non-hazardous Wastewater and Landfill Leachate Tanks

There are three 25,000-gallon tanks south of the Solid Waste Solidification Area used to store non-hazardous wastewater that is solidified in the Solidification Area.

There are two landfill leachate wastewater tanks located north of the Solid Waste Solidification Area (Photo 12) in addition to two 5,000-gallon tanks and one 12,000-gallon tank located south of the Solid Waste Solidification Area. 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, however, is in the process of installing a new treatment system for the leachate.

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. The facility collects the stormwater and solidifies the stormwater in the Solid Waste Solidification Area, described above.

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. There was one used oil transportation shipping paper that was reviewed where the halogen screening was not documented [62-710.510(1)(g), FAC] and where the generator's EPA ID number was not documented [62-710.510(1)(b), FAC].

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/COD vial D002/D007/D009/D011 hazardous waste is transported by AERC Recycling Solutions (FLD984262782) and manifested off-site to AERC Acquisition Corp. (PAD987367216). The

last hazardous waste shipment occurred April 13, 2022.

Metal-clad used oil filters are shipped to Georgia Petroleum Inc. (GAD981222433) 2-3 times per year for processing and were last shipped on August 1, 2022.

Spent fluorescent lamps are transported to Moran Environmental Recovery to a universal waste handler for recycling. Records indicate that 29 spent universal waste lamps were last transported to Moran Environmental Recovery on October 19, 2020.

The current DEP used oil registration was posted. One of the two certificates of liability insurance on file was expired at the time of inspection and the second expired subsequent to the inspection [62-710.600(2)(e)(1)(a), FAC]. The facility representative stated that coverage was in place and that a new certificate had been requested. WR has also submitted its 2020 and 2021 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 had to implement its Contingency Plan on May 10, 2022, when a tanker leaked used oil during transit to Georgia Petroleum. The emergency response was handled by Moran Environmental Recovery.

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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.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.15(a)
Explanation:	Dry Storage Area: There were 12 spent lamps that had been accumulating for more than one year.
Corrective Action:	No futher action is required. The facility returned to compliance via a September 22, 2022 email.

Type:	Violation
Rule:	62-710.510(1)(b)
Explanation:	The facility did not document the generator EPA ID number on one used oil transportation shipping paper.
Corrective Action:	In order to return to compliance, the facility should re-train employees in the proper

documentation procedure.

Type:	Violation
Rule:	62-710.510(1)(g)
Explanation:	The facility did not document the halogen screening on one used oil transportation shipping paper.
Corrective Action:	In order to return to compliance, the facility should re-train employees in the proper documentation procedure.

Type:	Violation
Rule:	62-710.600(2)(e)1.a
Explanation:	One of the two certificates of liability insurance on file for used oil transportation activities was expired at the time of inspection and the second expired subsequent to the inspection. The facility representative stated that coverage was in place and that a new certificate had been requested.
Corrective Action:	In order to return to compliance, the facility should provide the updated certificates of liability insurance.

PHOTO ATTACHMENTS:

Photo 1

Photo 2

Photo 3

Photo 4

Water Recovery LLC Inspection Report

Inspection Date: 09/06/2022

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

Photo 10

Water Recovery LLC Inspection Report

Inspection Date: 09/06/2022

Photo 11

Photo 12

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	11/18/2022
Principal Investigator Signature	**Organization**	**Date**

Amanda Kimball	Assistant 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:**	11/18/2022