



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

FACILITY INFORMATION:

Facility Name: Tampa Transflo Terminal

On-Site Inspection Start Date: 06/23/2023

On-Site Inspection End Date: 06/23/2023

ME ID#: 37009

EPA ID#: FLR000105338

Facility Street Address: 504 N 34th St, Tampa, Florida 33605-6200

Contact Mailing Address: 500 Water St #J975, Jacksonville, Florida 32202-4423

County Name: Hillsborough

Contact Phone: (904) 259-2279

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste, Transfer Facility

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility Facility

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for VSQG (<100 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Betsy Loaiza, Inspector

Other Participants: Warren McNelley, Government Operations Consultant III, Kevin Roberts, Railway Manager

LATITUDE / LONGITUDE: Lat 27° 57' 5.8056" / Long 82° 25' 21.1206"

NAIC: 488210 - Support Activities for Rail Transportation

TYPE OF OWNERSHIP: Private

Introduction:

Tampa Transflo Terminal (Tampa Transflo), was inspected by the Florida Department of Environmental Protection (Department) on June 23, 2023, to determine the facility's compliance with state and federal hazardous waste regulations governing Very Small Quantity Generators (VSQGs) of hazardous waste and Used Oil Transporters (UOTs). The facility originally notified as a Used Oil Transporter on February 13, 2004. The facility most recently notified as a VSQG of hazardous waste, a Hazardous Waste Transporter (expires 6/30/2024), and a Used Oil Transporter/ Transfer Facility (expires 6/30/2024) on March 28, 2023. Tampa Transflo has been inspected by the Department several times, most recently on March 30, 2021, and the Hillsborough county SQG program last inspected the facility on January 15, 2009. Department inspectors were assisted by the Railway Manager, Kevin Roberts, for the duration of the inspection.

Process Description:

Tampa Transflo Terminal is a rail to truck and truck to rail transfer facility for bulk commodities, including used oil, hazardous goods, and non-hazardous goods. Bulk commodities vary amongst 25 different products, including cement, propane, plastics, hydrogen peroxide, and magnesium. Materials are loaded into rail cars by the truck drivers and stored on site until full cars are transferred to CSX for transport to either the next non-rail transporter or the destination facility. The facility previously used to store and transfer hazardous waste but discontinued the practice in early 2020. Operations at Tampa Transflo have not changed since the last inspection and all operations are still conducted by Road and Rail Services. The facility is primarily comprised of a rail system that includes 11 separate tracks, a storage shed to the southeast, and a building that houses offices with an attached scale house on the east end of the property. Currently, there are approximately 13 employees on staff. Tampa Transflo operates from 6:00 AM to 6:00 PM Monday to Friday. The facility is connected to the City of Tampa water and sewer.

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OFFICE

There is no hazardous waste stored or generated in the office area.

RAIL YARD

The rail yard is comprised of 11 separate tracks that are numbered from 2 to 12, with each track containing several railcars dedicated to a set of products. Third-party truck drivers arrive to the scale house to weigh in and are then assigned a track and a railcar to begin loading product. All product is loaded directly into the railcars from the trucks by the truck drivers. As part of a contract, any damage sustained to the railcar in this process is the sole responsibility of the third-party contractor that loaded the product. Arriving railcars are inspected within 24 hours of arriving and again prior to leaving the rail yard. Track pans are in place and any spills which are not contained by the pan will drain to a trench which drains through a junction box to the facility's central storm water collection sump. In the event of a spill, knife valves can isolate the trenches and a secondary valve is present if needed to prevent discharge of the facility's storm water system. Emergency equipment, including spill kits, decontamination showers, and fire extinguishers are in place next to the tracks.

At the time of inspection, each track and corresponding railcars were assigned to contain the following:

- Track 2: All railcars contained plastic product.
- Track 3: All railcars contained non-hazardous liquids.
- Track 4: Comprised of separate railcars containing three different kinds of hydrogen peroxide concentrations and mixtures.
- Track 5: Included 5 railcars containing used oil and 2 railcars containing cement mixtures.
- Track 6: All railcars contained white cement product.
- Track 7: All railcars contained lime product.
- Track 8: All railcars contained perlite product.
- Track 9: All railcars contained non-hazardous liquids including samples of herbicides
- Track 10: All railcars contained ethylene glycol.
- Track 11/12: All railcars contained plastic products.

At the time of inspection, Department personnel observed railcars to be properly labeled with indications of the contents and DOT identification numbers. All railcars appeared to be in good working condition, during the inspection.

STORAGE SHED

The storage shed is located on the southeast end of the parcel and is used to store facility equipment. The storage area does not generate hazardous waste.

CENTRAL ACCUMULATION AREA (CAA)

The CAA is located adjacent to the storage shed on the southeast end of the property. Tampa Transflo generates small quantities of hazardous waste and used oil from loading and maintenance activities onsite.

At the time of inspection, the following containers were in use:

- One 55-gallon drum of used oil.
- One 55-gallon drum of used oil filters.
- One 55-gallon drum of aerosols.
- Eight 5-gallon plastic buckets of hydraulic fuel.

All containers and drums were observed to be properly closed and labeled in accordance with applicable rules and regulations.

The following containers were not in use:

- Three 55-gallon plastic drums.
- Eight 55-gallon metal drums.

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RECORDS REVIEW

At the time of inspection, Tampa Transflo was notified as a VSQG of hazardous waste, a Hazardous Waste Transporter, and a Used Oil Transporter/ Transfer Facility; therefore, the facility was inspected as such. Prior to the inspection, a records review was conducted on all annual reports submitted to the Department. The Annual Used Oil Handler report and State of Florida Liability Insurance form (expires 10/1/2023) was reviewed and appeared to be complete and current.

A records review was conducted onsite:

- Used oil shipment records were reviewed onsite and appeared to be complete. Tampa Transflo maintains a 35-day storage log for used oil, that records all information pertaining to shipment including, terminal, shipper, railcar, arrival date, and release date. The 35-day storage clock starts with the initial transfer of used oil into a rail car. Records appeared to show that used oil was not stored onsite for more than the allowable limit.
- The most recent shipment of used oil was transferred from Safety Kleen Systems Inc. (FLD980847271) by Railcar TEIX30030 to Safety Kleen Systems Inc. (IND077042034) for 2,613 gallons.
- Three years of invoices and manifests for all regulated waste pickups were reviewed and appeared to be complete.

The most recent shipment of hazardous waste was picked up by Clean Harbors Environmental Services, Inc. (MAD039322250) on May 4, 2023, and transported to Clean Harbors Florida LLC (FLD980729610). The shipment consisted of the following:

- 400 pounds of hazardous combustible liquid (diesel fuel) (D001).
- 400 pounds of non-hazardous oily debris.
- 800 pounds of used oil.
- 800 pounds of non-hazardous, non-DOT regulated waste.

The facility notified the Department that the most recent shipment of hazardous waste was due to a clean out of expired products and waste from a diesel fuel pump onsite. Tampa Transflo has not had another pickup of hazardous waste in the last three years.

- The facility maintains a contingency plan and annual training records for all employees that were available for review. Kevin Roberts, Railway Manager, retired from Tampa Transflo on June 30, 2023. The facility shall ensure that the contingency plan is updated with the new emergency coordinator following Kevin Robert's departure.

PHOTO ATTACHMENTS:

Facility Overview



Central Accumulation Area



Central Accumulation Area



Spill Response Kit Near Each Track



Track Pans



Used Oil Railcars



Conclusion:

At the time of the inspection, Tampa Transflo Terminal was operating in compliance with state and federal regulations governing Very Small Quantity Generators of hazardous waste and Used Oil Transporters.

2.0: VSQG 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. | Standards for Very Small Quantity Generators | Yes | No | N/A |
|----------|---|-----|----|-----|
| 2.1 | Generator Size Determination (If the answer is No for any one question then facility is not a VSQG) | | | |
| 2.2 | Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1) | ✓ | | |
| 2.3 | Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1) | ✓ | | |
| 2.4 | Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4) | ✓ | | |
| 2.5 | Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3) | ✓ | | |
| Item No. | Hazardous Waste Determination | Yes | No | N/A |
| 2.6 | Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 Is it excluded under 261.4? Is it listed in subpart D of 261 or appendix IX of 261? Has the waste been analyzed? Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied? | ✓ | | |
| Item No. | Record Keeping | Yes | No | N/A |
| 2.7 | Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) Name and address of the generator and TSD/authorized facility. Type and amount of hazardous waste delivered. Date of shipment | ✓ | | |
| 2.8 | Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2) | ✓ | | |

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

Betsy Loaiza**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**07/13/2023**Date**Warren McNelley**Inspector Name**Government Operations
Consultant III**Inspector Title**DEP**Organization**Kevin Roberts**Representative Name**Railway Manager**Representative Title**Road and Rail Services**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:**Warren McNelley**Inspection Approval Date:**07/14/2023