Pedigo, Leslie

From: Coleman, Lauren J.
Sent: Tuesday, November 21, 2023 3:50 PM
To: Miller, Michael B.
Cc: Pedigo, Leslie
Subject: FW: Plant City - FLD065 680 613 - Report #2023-9536 - 5-Day Follow-Up
Attachments: Final 5-Day Follow-Up Letter - Plant City Fire.pdf; duratherm-hto-sds.pdf

FYI

From: Schulenberg, Rebekah <Rebekah.Schulenberg@Crystal-Clean.com>
Sent: Tuesday, November 21, 2023 12:40 PM
To: Coleman, Lauren J. <Lauren.Coleman@FloridaDEP.gov>; Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Cc: Decina, Anita <Anita.Decina@Crystal-Clean.com>; Petkovich, Mike <Michael.Petkovich@Crystal-Clean.com>; Piotrowski, Tony <Tony.Piotrowski@Crystal-Clean.com>; Walper, Michelle <Michelle.Walper@Crystal-Clean.com>; Marsh, Eric <Eric.Marsh@Crystal-Clean.com>
Subject: Plant City - FLD065 680 613 - Report #2023-9536 - 5-Day Follow-Up

Good Afternoon Lauren and Kim,

Per our Used Oil Processing Permit requirements, I am e-mailing to you this 5-Day Follow-Up Letter regarding a fire that occurred at the facility last Thursday.

I will send the hardcopy to the administrator address via UPS. I will be sent out today – I will overnight it.

Please let me know if you have any questions, comments, or I need to send anywhere else.

Thank you -

Rebekah Schulenberg-Schwarz

Rebekah Schulenberg-Schwarz
Environmental Compliance Manager
Crystal Clean, LLC
2000 Center Drive, Suite East C300
Cell: (847) 873-6942
rebekah.schulenberg@Crystal-Clean.com

this e-mail and the attached documentation by anyone other than the intended recipient shall not be deemed a waiver of any rights of confidentiality.

November 21, 2023

Environmental Administrator
C/O Lauren Coleman or Kim Thursby
Hazardous Waste Program and Permitting, M.S. 4560
Department of Environmental Protection
2600 Blair Stone Road, Tallahassee, Florida 32399-2400

RE: **Heritage Crystal Clean, Plant City, 6-17-2022 Fire – 5-Day Follow-Up Report**
105 South Alexander Street, Plant City, FL 33563
EPA ID NUMBER: FLD 065 680 613
Report Number: 2023-9536
Facility Manager: Kevin McIntyre
e-mail: kevin.mcintyre@crystal-clean.com
Phone: 863-582-6376

On Thursday, November 16, 2023, Heritage Crystal Clean, LLC (Crystal Clean) notified the Florida Department of Environmental Protection (Department) about a fire that occurred at our Plant City facility at approximately 1PM EST. During the initial call, we provided information that no injuries had occurred and that the fire had been extinguished by the time notification had been made. The duration of the fire was approximately 30 minutes.

The Plant City Fire Department immediately responded to our call and was able to extinguish the fire shortly after it started. All electrical and fuel switches were shut down during the response and have remained turned off pending investigation. We are thankful to confirm that the incident was successfully mitigated with no injuries. The following information is provided per the Used Oil Processing Permit Requirements.

IDENTITY AND QUANTITY OF MATERIALS INVOLVED:
As reported on the news, there was an intense storm that caused a surge of approximately 7 inches of rain into our containment area where our oil burning furnace was located. Pursuant to our Standard Operating Procedures, Crystal Clean employees had initiated a transfer of wastewater into the treatment system. The wastewater is normally transferred into the sump, in the containment area, and from the sump it is pumped into the wastewater treatment system for processing. The wastewater that is normally transferred into the sump goes directly to wastewater treatment and does not enter the containment area. However, on November 16, the rain event caused the sump pump to be overwhelmed and the wastewater left the sump and traveled toward the furnace in containment. Approximately 50 gallons of distillate fuel had also been released into the sump and the root cause of the distillate fuel is still under investigation. When the wastewater, that included the distillate layer, reached the furnace, the distillate layer was ignited.

Once ignition occurred, causing a flash fire, a nearby poly drum of thermal oil (Dura Therm HTO SDS Attached) ignited due to the heat. Subsequentially, a valve gasket in a nearby thermal process surge tank became compromised in the heat and slowly released approximately 1100 gallons of the same HTO oil.

Compressed air from a compressor located within the area added oxygen to the fire under heat conditions. The fuel line that feeds the furnace initially failed; however, an employee hit the emergency stop as soon as he saw the fire resulting in minimal fuel from this tank to release. Three 20-pound fire extinguishers, containing dry chemicals, also ruptured and the foam released into the fire. The plant fail safes did end up working and allowed most valves to close. The furnace fuel and the electrical main were shutoff by our employee.

REMAINING HAZARDS:
The insurance adjuster completed their walkthrough on November 20, 2023. The area was cordoned off immediately following the fire and the electrical will remain shut off until repairs have been made. Once the fire department stated an all clear in the area it was degreased, evacuated, vapors were removed and debris was picked up. We do not believe there are any potential hazards remaining.

QUANTITY AND DISPOSITION OF RECOVERED MATERIALS
We recovered 2800 gallons of oily water from the scene. This included 1000-1500 gallons of degreaser and wash water generated from cleanup activities. The oily water was placed into an onsite tank and will be processed once the facility resumes operations.

EVENT ROOT CAUSE
We believe that the sudden heavy rain event directly contributed to the fire. As stated earlier, transferred wastewater, from our holding tanks, does not normally overwhelm the sump pump. It is normally pumped straight into the wastewater treatment facility. Along with the unforeseen addition of the distillate fuel, there was an unfortunate incident resulting in a fire. A full event root cause investigation is underway.

STEPS TAKEN TO REDUCE, ELMINATE AND PREVENT REOCCURENCE
Crystal Clean is committed to the safe and secure handling, processing, and management of used oil products at all our facilities. Crystal Clean is also committed to ensuring the physical safety of all employees and to the reduction and prevention of oil and hazardous material incidents. We have our electricians on site, and we will ensure that they have confirmed all possible hazards have been mitigated prior to turning electrical back on. We will also ensure that all valves, gaskets, and equipment are properly repaired or replaced prior to starting the furnace system.

We will be completing an exhaustive engineering review at the facility, during the week of November 27, 2023, to determine any changes that can be made to reduce the risk of this occurring again. Additionally, we will:

1. Review current Standard Operating Procedures at the facility and implement changes regarding the safe transfer of products between tanks which will include weather checks, stronger communications between personnel, and ensuring that no unattended transfers occur (even if the transfers are to a sump)

2. Operators will be retrained on timing, oversight, and management of transfers in accordance with the new Crystal Clean Standard Operating Procedures.

3. Additional engineering measures and preventative steps to ensure sump overflows do not occur.

It is Crystal Clean's intent to maintain compliance with our used oil processing permit for the facility. We will continue to identify all solutions necessary to ensure safe and efficient operations.

Sincerely,

Rebekah Schulenberg
Rebekah.schulenberg@crystal-clean.com
847-873-6942
Environmental Compliance Manager
Heritage-Crystal Clean, LLC
Attachment

Safety Data Sheet (SDS)

OSHA HazCom Standard 29 CFR 1910.1200(g), Rev. 2012 and GHS Rev 03

SECTION 1: Identification of the substance/mixture and of the company/undertaking

Product identifier

Product form:	Mixture
Trade name:	Duratherm HTO
Product code:	Duratherm HTO
Recommended application:	Heat Transfer Fluid

Details of the supplier of the safety data sheet

Duratherm
P.O Box 563, Lewiston, NY, 14092
Telephone: 1-905-984-6677
Qualified person's e-mail address: info@durathermfluids.com

Emergency telephone number:

Tel.: 1-905-984-6677

SECTION 2: Hazards identification

Classification of the substance or mixture

This substance is not classified according to the Globally Harmonized System (GHS)

Label elements

GHS label elements:	Non-regulated material, no labeling elements
Hazard pictograms:	Non-regulated material
Signal word:	No single word, non-regulated material

Classification system

NFPA Rating: Health: 0, Fire:1, Reactivity:0
HMIS Rating: Health: 0, Fire:1, Reactivity:0

Other hazards

Other Hazards:	None known

SECTION 3: Composition/information on ingredients

3.1 Substance

Not applicable

3.2 Mixture

Chemical Characterization:	Mixture
Classification according to GHS:	Not classified
Dangerous Components:	None, non-regulated material

Component Name	Identification	Classification according to GHS	%
Hydrocarbon Base Fluids	CAS#: 64742-54-7	Not classified	90-95%
Proprietary Additives	Trade Secret	Not classified	5-10%

SECTION 4: First aid measures

Description of first aid measures

Inhalation:	Supply person with fresh air and consult doctor according to symptoms.

Skin contact:	Remove polluted, soaked clothing immediately, wash thoroughly with plenty of water and soap, in case of irritation of the skin (flare),consult a doctor.
Eye contact	Remove contact lenses. Wash thoroughly for several minutes using copious water. Seek medical help if necessary.
Ingestion	Rinse the mouth thoroughly with water. Do not induce vomiting. Consult doctor immediately.

Indication of any immediate medical attention and special treatment needed
Treat symptomatically

SECTION 5: Firefighting measures

Suitable extinguishing media:	Water jet spray/foam/CO2/dry extinguisher
Unsuitable extinguishing media:	High volume water jet

Special hazards arising from the substance or mixture
In case of fire the following can develop: Oxides of carbon, toxic gases

Advice for firefighters
In case of fire and/or explosion do not breathe fume use protective respirator with independent air supply. According to size of fire use full protection, if necessary. Cool container at risk with water. Dispose of contaminated extinction water according to official regulations.

SECTION 6: Accidental release measures

Personal precautions, protective equipment and emergency procedures

Personal precautions protective equipment:	Not required
Environmental precautions:	If leakage occurs, dam spillage and resolve leaks as soon as possible. Prevent fluid from entering drainage systems. If fluid accidently enters drainage system alert authorities

Methods and material for containment and cleaning up
Soak up with absorbent material (e.g. universal binding agent, oil-dry, sand, diatomaceous earth) and dispose in accordance with local regulations

Reference to other sections
See section 7 for information on safe handling, see Section 8 for information on personal protection equipment, see Section 13 for disposal information

SECTION 7: Handling and storage

In addition to information given in this section, relevant information can also be found in section 8 and 6.1.

Precautions for safe handling:	No special measures required
Information about protection against explosions or fires:	No special measures required
Requirements to be met by storerooms:	Store in a cool dry place
General guidelines:	Ensure good ventilation; avoid contact with eyes or skin

.

Notes on general hygiene measures at the workplace
General hygiene measures for the handling of chemicals are applicable
Wash hands before breaks and at end of work
Keep away from food, drink and animal feed
Remove contaminated clothing and protective equipment before entering areas in which food is consumed

SECTION 8: Exposure controls/personal protection

Control parameters
No further data; see Section 7

Exposure controls:

Appropriate engineering controls:	Contain with oil absorbing material (oil dry). Remove oil absorbing material and dispose lawfully

Personal protective equipment:

Hand protection:	PVC, neoprene, or nitrite gloves. Gloves should be replaced immediately if damaged or worn
Eye protection:	Eye protection necessary where liquid could be splashed or sprayed
Materials for protective clothing:	PVC, neoprene, or nitrite gloves
Hand protection:	In case of repeated or prolonged contact wear gloves and use moisturizing skin cream
Respiratory protection:	Normally not required in areas with adequate ventilation. In areas with poor ventilation or in the case of likely misting use appropriate respiratory equipment
Environmental exposure controls:	See section 12
Consumer exposure controls:	PVC gloves. Neoprene or nitrile rubber gloves
Other:	Wash hands thoroughly after exposure. Do not eat drink or smoke during use. Wash contaminated clothing before use

SECTION 9: Physical and chemical properties

Information on basic physical and chemical properties

Physical state:	Liquid
Color:	Light yellow, clear
Odor:	Characteristic
Odor threshold:	Not determined
pH-value:	Not determined
Melting point/freezing point:	Not determined
Initial boiling point and boiling range:	>570^{O}F (>298^{O}C)
Flash Point ASTM D92 (COC):	>395^{O}F (>201^{O}C)
Evaporation Rate:	NA
Flammability (solid, gas)	NA
Lower explosive limit:	Not determined
Upper explosive limit:	Not determined
Density @ 20^{O}C:	0.83-0.86 g/ml
Bulk density:	NA
Solubility(ies):	Not determined
Water solubility:	Insoluble
Partition coefficient (n-octanol/water)	Not determined
Auto-ignition temperature:	Not determined
Decomposition temperature:	Not determined
Viscosity:	40 cSt @ 40^{O}C
Explosive properties	NA
Oxidizing properties:	Not determined

Other information

Miscibility:	Not determined
Fat solubility / solvent:	Not determined
Conductivity:	Not determined
Surface tension:	Not determined
Solvents content:	Not applicable

SECTION 10: Stability and reactivity

Reactivity:	Stable under normal conditions
Chemical Stability:	Stable under normal conditions
Possibility of hazardous reactions:	No dangerous reactions known
Conditions to avoid:	See section 7

Incompatible materials: Strong oxidizing agents, acids
Hazardous decomposition products: No dangerous decomposition products known

SECTION 11: Toxicological information

Possibly more information on health effects, see Section 2 (classification).

Acute toxicity: Not Classified

DURATHERM HTO					
Toxicity/effect	Endpoint	**Value**	**Unit**	**Organism**	**Notes**
Acute toxicity, by oral route:	LD50	>5000	mg/kg	Rat	
Acute toxicity, by dermal route:	LD50	>2000	mg/kg	Rat	
Acute toxicity, by inhalation:	LD50	>2500	mg/kg/ 4hr	Rat	

Skin corrosion/irritation: Not classified – Unlikely to cause harm to harm to skin with brief contact, long term contact may cause dermatitis
Serious eye damage/irritation: Not classified
Respiratory or skin sensitization: Not classified
Repeated does toxicity: Not classified
Germ cell mutagenicity: Not classified
Carcinogenicity: Not classified
Reproductive toxicity: Not classified
Other information: No further information available

SECTION 12: Ecological information

DURATHERM HTO					
Toxicity/effect	**Endpoint**	**Value**	**Unit**	**Organism**	**Notes**
Toxicity to fish:	LD50	>100,000	mg/kg /96hr	Trout	
Toxicity to daphnia:					n.d.a.
Toxicity to algae:					n.d.a.
Persistence and degradability:					n.d.a.
Bio-accumulative potential:					n.d.a.
Mobility in soil:					n.d.a.
Results of PBT and vPvB assessment:					n.d.a.
Other adverse effects:					n.d.a.

SECTION 13: Disposal considerations

Waste treatment methods

For the substance / mixture / residual amounts
Soaked polluted cloths, paper or other organic materials represent a fire hazard and should be controlled, collected and disposed of
For contaminated packing material
Pay attention to local and national official regulations
Empty container completely.
Uncontaminated packaging can be recycled.
Dispose of packaging that cannot be cleaned in the same manner as the substance.
Do not perforate, cut up or weld un-cleaned container.

SECTION 14: Transport information

Transport statements

UN number

DOT, ADN, IMDG, IATA:	Non-regulated material
ADR:	Non-regulated material

UN proper shipping name:

DOT, ADR, ADN, IMDG, IATA:	Non-regulated material

Transport hazard class(es)

DOT, ADR, ADN, IMDG, IATA:	Non-regulated material

Packaging Group

DOT, ADR, IMDG, IATA:	Non-regulated material

Environmental hazards

Marine pollutant:	No
Special precautions for users:	None
Transport in bulk according to Annex II: of MARPOL 73/78and IB Code UN "Model Regulation"	Not applicable

SECTION 15: Regulatory information

Safety, health and environmental regulations/legislation specific for the substance or mixture

SARA Hazards	No SARA Hazards
TSCA (Toxic Substances Control Act):	All chemical substances in this mixture are included on or are exempted from listing on the TSCA Inventory for Chemical Substances
Proposition 65	Based on available information this product does not contain any components or chemicals currently known to the State of California to cause cancer, birth defects or reproductive harm at levels which would be subject to Proposition 65

Labeling requirements

GHS label elements	Non-regulated material
Hazard pictograms	Non-regulated material
Signal word	Non-regulated material

SECTION 16: Other information

These details refer to the product as it is delivered.

The statements made here should describe the product with regard to the necessary safety precautions - they are not meant to guarantee definite characteristics - but they are based on our present up-to-date knowledge.

Any abbreviations and acronyms used in this document:

AC	Article Categories
acc., acc. to	according, according to
ADR	Accord européen relatif au transport international des marchandises Dangereuses par Route
Art., Art. no.	Article number
ATE	Acute Toxicity Estimate according to Regulation (EC) 1272/2008 (CLP)
BOD	Biochemical oxygen demand
CAS	Chemical Abstracts Service
CEC	Coordinating European Council for the Development of Performance Tests for Fuels, Lubricants
CLP	Classification, Labeling and Packaging (REGULATION (EC) No 1272/2008 on classification, labeling and packaging of substances and mixtures)
CTFA	Cosmetic, Toiletry, and Fragrance Association
e.g.	for example (abbreviation of Latin 'exempli gratia'), for instance
EC	European Community
ECHA	European Chemicals Agency
EEA	European Economic Area
EEC	European Economic Community

EINECS	European Inventory of Existing Commercial Chemical Substances
ELINCS	European List of Notified Chemical Substances
EN	European Norms
EPA	United States Environmental Protection Agency (United States of America)
ERC	Environmental Release Categories
ES	Exposure scenario
Fax.	Fax number
gen.	general
GHS	Globally Harmonized System of Classification and Labelling of Chemicals
HMIS	Hazardous Material Identification System
IARC	International Agency for Research on Cancer
IATA	International Air Transport Association
IBC	Intermediate Bulk Container
IBC (Code)	International Bulk Chemical (Code)
IC	Inhibitory concentration
LC	lethal concentration
LC50	lethal concentration 50 percent kill
LD50	Lethal Dose, 50% kill
n.a.	not applicable
n.av.	not available
n.c.	not checked
n.d.a.	no data available
NFPA	National Fire Protection Association
ppm	parts per million
UN RTDG	United Nations Recommendations on the Transport of Dangerous Goods
VOC	Volatile organic compounds
WHO	World Health Organization
wwt	wet weight

These statements were made by:
Duratherm, P.O Box 563, Lewiston, NY, 14092, Tel.: 1-905-984-6677, info@durathermfluids.com