



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

FACILITY INFORMATION:

Facility Name: Liquid Environmental Solutions of Florida LLC
On-Site Inspection Start Date: 05/07/2019 **On-Site Inspection End Date:** 05/07/2019
ME ID#: 33798 **EPA ID#:** FLD981928484
Facility Street Address: 1640 Talleyrand Ave, Jacksonville, FL 32206-5436
Contact Mailing Address: 1640 Talleyrand Ave, Jacksonville, FL 32206-5485
County Name: Duval **Contact Phone:** (904) 438-2138

NOTIFIED AS:

Used Oil
VSQG

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility
Routine Inspection for VSQG (<100 kg/month) facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Bonnie M Bradshaw, Inspector
Other Participants: Yuri Turovsky, Plant Manager

LATITUDE / LONGITUDE: Lat 30° 20' 36.3664" / Long 81° 37' 44.8878"

NAIC 562920 - Materials Recovery Facilities

TYPE OF OWNERSHIP: Private

Introduction:

Liquid Environmental Solutions of Florida, LLC. (LES) was inspected May 7, 2019, as an unannounced hazardous waste compliance inspection. LES was last inspected by the Department's Hazardous Waste Program on November 30, 2016. The facility is registered and operating as a Used Oil Transporter, Used Oil Filter Transporter, Used Oil Filter Transfer Facility and Used Oil Filter Processor. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste, an Off-spec Used Oil Marketer and Petroleum Contact Water Transporter and Recoverer. The facility is permitted and operating as a Used Oil Processor. Pam Fellabaum (DEP) and Yuri Turovsky (LES) were present throughout the inspection. Kem Khim (LES) was present during the inspection of the laboratory. A follow-up meeting was held on July 8, 2019 with Mr. Turovsky to clarify some of the records.

The facility was issued Used Oil and Material Processing Facility permit numbers 72815-017-HO and 72815-019-HO and Solid Waste permit number 72815-018-SO. These permits expire November 20, 2022. A permit minor modification was approved on May 8, 2018. The modification included the addition of Tanks 121 and 122 and the closure and removal of Tanks 3A, 3B, 4A and 4B. This work had been completed at the time of inspection. The facility is permitted to discharge wastewater generated during its operations to the city sewer under Industrial User Discharge Permit (IUDP) #019 issued February 1, 2018. This IUDP expires January 31, 2023.

LES manages non-hazardous, liquid and solid waste streams. LES is not a terminal receiver of solid waste, as it only processes spent industrial waste streams with the resulting solid waste being transported to a landfill. LES leases the property and buildings and has been operating at this location since December 23, 2009. LES has 20-30 employees and is on city water and sewer. LES operates Monday through Friday from 7:00 am to 6:00 pm and Saturday from 7:00 am to 12:00 pm.

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The LES main administrative office is located across the street and north of the permitted operating facility. The permitted operating facility is comprised of a Laboratory Complex, the Used Oil Processing Area, the Oily Water Treatment Area, the Petroleum Contact Water Treatment Area, the Wastewater Treatment Area, the Plate and Frame Filter Press Area, the Solidification Pits, the Used Oil Filter and Container Storage Area, the Transportation Area, the Grease Waste Processing Area and the Maintenance Shop.

Process Description:

Laboratory Complex

The Laboratory Complex is located in the northwest corner of the facility and consists of the Receiving Laboratory and "Back" Laboratory (trailer).

Prior to trucks being off-loaded at one of three off-loading stations (Photo 1), LES personnel collect samples from all incoming liquid waste using a Composite Liquid Waste Sampler (COLIWASA) for fingerprint analysis. After sampling, the COLIWASA is placed in a secondary containment sump (Photo 2) located outside and adjacent to the Receiving Laboratory for continuous use. Accumulated liquids are automatically pumped to one of the process tanks. There was one step-can for the collection of oily rags located adjacent to the COLIWASA sump. Rags are laundered weekly by Aramark.

A portion of all used oil samples is maintained for 30 days in a refrigerator located outside the entrance of the Receiving Laboratory (Photo 3). The excess used oil that is not saved is accumulated in a 5-gallon container located outside and adjacent to the Receiving Laboratory (Photo 4) and managed as used oil. The container was covered, properly labeled and stored in a secondary container which appeared to meet the requirements. The facility is reminded that secondary containment for used oil containers is required to have a capacity of 110% of the volume of the largest container within the containment area. When full, the container is emptied into either Tank 51, 52 or 62 and managed as used oil.

A fingerprint analysis is performed by the Receiving Laboratory for pH, flashpoint, total organic halogens (TOH), metals (except mercury), and PCB's. Dexsil Chlor-D-Tect Q4000 (ethanol 3.33%, naphthalene 11.57%, mercuric nitrate in water 9.32%, and sulfuric acid in water containing <0.05% cadmium 68.64%; flashpoint 48°F to 162°F) is used to analyze TOH. The test kits come with a disposal ampule and instructions state that when the disposal instructions are followed, the test kits will pass a Toxicity Characteristic Leaching Procedure (TCLP) test. Spent test kits are disposed of in the trash.

Dexsil Hydroscout test kits (calcium hydride 81.19%, water 18.81%, propylene glycol 6.58%; flashpoint 100-217° F), are sometimes used to measure oil content of a sample by adding 1 ml of a sample to the test kit vial. The test kit includes a disposal ampule and instructs users to dispose of the waste in the regular laboratory waste. The facility disposes of the spent vials in the trash. Un-used gray ampules (calcium hydride) are D001 hazardous waste.

Small amounts of hexane or acetone is added to samples in order to run PCB and other tests. The lab manager estimates that approximately 200 milliliters of solvent waste is generated by this process per month. Waste samples may possibly generate D001/F003 hazardous waste. The samples are emptied into the 5-gallon used oil container located outside and adjacent to the Receiving Laboratory and managed as used oil. 40 CFR 262.13(f)(1)(iii) allows this by stating that "if a very small quantity generator's wastes are mixed with used oil, the mixture is subject to 40 CFR Part 279."

Wastewater is tested by the Receiving Laboratory prior to discharge to ensure compliance with the wastewater permit. Chemical Oxygen Demand (COD) 20-1500 mg/l test kits (mercuric sulfate 1%, water 25%, chromic acid 1%, silver sulfate 3%, sulfuric acid 90%; flashpoint listed as not applicable) are used in this process. Spent COD vials are D002/D007/D009/D011 hazardous waste. Spent COD vials are collected in a 55-gallon drum stored on a spill pallet outside of the Receiving Laboratory (Photo 5). The drum was closed, in good condition and labeled.

Wastewater total nitrogen and total phosphorus are also tested by the Receiving Laboratory using Hach total nitrogen reagents (sodium hydroxide <0.5%, sulfuric acid 90%, potassium persulfate 100%, sodium metabisulfite 100%, urea 35%, disodium salt chromatropic acid 10%, white quartz sand 70%, sodium metabisulfite 10%, flashpoint listed as not applicable) and total phosphorus reagents included in test kits (ammonium molybdate 5%, ammonium metavanadate <1%, sulfuric acid 45%, potassium persulfate 100%,

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sodium hydroxide 15%; flashpoint listed as not applicable). Spent vials are D002 hazardous waste. The facility neutralizes the vials in the fume hood prior to disposal to the Jacksonville Electric Authority (JEA) Public Owned Treatment Works (POTW). Unused components of the test kits may possibly be D001/D002 hazardous waste.

Acetone is used to clean glassware. This generates a D001/F003 hazardous waste. The lab manager estimates that approximately 1 liter of spent acetone is generated every 1-1.5 years. There was one 4-liter container of the D001/F003 spent acetone accumulating at the time of inspection (Photo 6). The spent acetone is added to Tank 12, 14 or 18 which are low flash used oil tanks that are managed as used oil.

The Back Laboratory (Photo 7) performs used oil treatability testing. Demulsifiers and heat are used to conduct the testing. No hazardous waste is generated in this area.

There was one fire extinguisher observed in the Back Lab. The SPCC/Contingency Plan referenced in the permit application indicates four fire extinguishers should be present in the building. In addition, the maintenance shop has been relocated from the building. These changes were not reflected in the current SPCC/Contingency Plan. The facility is reminded that amendments permitted to be made by the owner/operator should be incorporated as soon as practicable or within six months, as required by the Plan. The list of required emergency equipment in the SPCC/Contingency Plan should be kept up-to-date and the equipment available as described.

Laboratory Records Review

LES is currently operating as a VSQG of hazardous waste for small amounts of spent COD and solvent waste generated by the laboratory. The facility generates approximately 400 pounds of COD and spent solvent waste every six months. The COD waste is transported by AERC Acquisition Corporation – FL (FLD 984 262 782) and manifested off-site to AERC Acquisition Corporation -PA (PAD 987 367 216). Waste was last transported on April 23, 2019.

Used Oil Processing Area

The Used Oil Processing Area (Photo 8) is primarily located in the southwest corner of the facility. Twenty aboveground tanks are dedicated for used oil processing with a total capacity of 312,175 gallons. The facility is authorized to store and use 95% of the total capacity which is 296,566 gallons of used oil. Mr. Turovsky said that approximately 10% of all incoming shipments are used oil. Shipments of used oil are off-loaded into Tanks 51 and 52 that have a capacity of 15,000 gallons each.

The used oil is processed by gravity separation, heating and/or the addition of de-emulsifying chemicals. After treatment, the oil is transferred to Tanks 24-26 (15,000 gallons each) and Tank 27 (15,700 gallons) to cool down. If no other processing is necessary, the oil is directed to Tank 54 (19,000 gallons), Tank 55 (9,750 gallons) and Tank 56 (20,000 gallons) for shipment off-site. The remaining tanks in this area are used for oil recirculation and storage and are as follows: Tank 10 (4,800 gallons), Tank 12 (7,800 gallons), Tank 14 (9,750 gallons), Tank 16 (16,075 gallons), Tank 18 (9,950 gallons), Tanks 19, 20, and 22 (7,800 gallons each), Tank 23 (9,950), Tank 53 (85,000 gallons) and Tank 101 (6,000 gallons).

Gravity separated oily water from the used oil tanks is transferred to Tank 44. This tank is an oil/water separator with a capacity of 10,000 gallons. Oil generated from Tank 44 is transferred back to either Tank 51 or Tank 52. The oily water process is described below. Sludge and tank bottoms are not typically generated by used oil processing, but if solids are generated during tank clean-out, they are run back through the process.

All used oil tanks were properly labeled as "Used Oil" and appeared to be in good condition. Tank 22, although labeled as "Used Oil," was also labeled as "Diesel Fuel." The facility is reminded to ensure that all tanks and containers are properly labeled only with their contents.

There were significant cracks, gaps and areas of disrepair located along the south wall of the used oil secondary containment area, both behind the used oil tanks and behind the wastewater tanks (Photos 9, 10 and 11). At the time of inspection these areas had not been repaired [Permit Condition, Part II #7, and 40 CFR 279.54(d)(2)]. It appeared that the area behind the used oil tanks had been repaired in the past, but the concrete patch used for the repair was failing and separating from the wall. In addition, there was vegetation

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and debris observed along the interior south wall in the area where the foundation and vertical wall meet and along the exterior south wall, making performing an adequate inspection of the secondary containment difficult.

LES currently markets only off-specification used oil in batches of 13,000 gallons or more from Tanks 54 and Tank 55. Off-spec, outgoing shipments to used oil burners are analyzed for flashpoint, TOH and percent water. The facility is reminded that the analysis plan and regulation require that on-spec outgoing shipments to Used Oil Marketers and Processors be analyzed for pH, flashpoint, TOH, metals (arsenic, cadmium, chromium and lead) and PCBs. Used oil prepared for off-site shipment usually remains on-site for one to two weeks.

Used Oil Processing Records Review

Used oil processing records are maintained in the Receiving Laboratory for a minimum of three years.

Used oil acceptance records reviewed included electronic manifests and off-loading tickets and an electronic database. Transporter addresses and telephone numbers, type code designations and halogen screening results are maintained in the electronic database. All other required information is included on manifests or off-loading tickets. All acceptance records appeared in order.

All used oil sales transactions are recorded on an LES receipt of sale form and electronically retained. End use code designations and transporter addresses and telephone numbers were noted in the electronic database. All sales records appeared in order.

Used Oil Processor training records, permit records and annual reports were reviewed and appeared to be in order.

Oily Water Treatment Area

The Oily Water Treatment Area tanks are located primarily on the interior portion of the north side of the facility. Eighteen tanks are used for oily water treatment with a total capacity of 282,540 gallons. The oily water tanks are configured as follows: Tank 1 and Tank 2 (27,270 gallons each), Tank 6 (62,000 gallons), Tank 70 (9,500 gallons), Tank 71 and Tank 72 (6,500 gallons each), Tank 83 and Tank 84 (5,500 gallons each), Tanks 85-88 (6,000 gallons each), Tank 91 and Tank 92 (5,000 gallons each), Tank 93 and Tank 94 (12,000 gallons each) and Tank 121 and 122 (37,000 gallons each).

Oily water is off-loaded from tank and vacuum trucks at one of three receiving stations located in front of the facility. From the receiving station, oily water is transferred to Tanks 1, 2, 6, 121 or 122. From Tanks 1, 2, 6, 121 and 122, oily water is transferred to Tank 44, the oil/water separator. Free oil is syphoned off and transferred back to the used oil processing tanks for further treatment. The remaining wastewater is transferred to the Dissolved Air Flotation (DAF) unit Tank 45 (2,000 gallons), DAF Inlet Tank 45A (1,000 gallons) and DAF Clarifier Tank 47 (4,200 gallons).

Depending on the profile, some oily water is transferred to a heat exchanger, Tank 44 and then to DAF Tanks 45, 45A and 47 for treatment. In the DAF tanks, wastewater liquid is chemically treated for pH adjustment to induce coagulation and flocculation. Separated solids/sludge/residues are pumped to the Solidification Pits described below for further processing. The treated wastewater is then discharged to the JEA POTW at Buckman Street under JEA IUD Permit #019.

All liquids accumulated in the secondary containment area collection system are transferred to Tank 1, 2, 6, 121 or 122 in the Oily Water Treatment Area for processing. The secondary containment area is comprised of an integrated stormwater, liquid and trench drainage collection system. Stormwater and liquids are collected in one of five sumps and a center-line trench drain located in the secondary containment area. One sump is between Tanks 9 and 37 (Photo 12), two are adjacent to the side of Tank 6, one is adjacent to Tank 84 and one is between Tanks 92 and 91. The trench drain extends out from Tank 6 in the center of the secondary containment area.

Petroleum Contact Water (PCW) Treatment Area

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The facility receives PCW by tanker trucks. Incoming shipments of PCW are analyzed for pH, TOH and flashpoint. PCW is unloaded into Tanks 81 and 82 (5,000 gallons each), located to the north adjacent to the electrical shed (Photo 13). Product is phase separated, transferred to the oil processing tanks and sent off-site. Water associated with the product is treated as necessary prior to discharge to the POTW. The volume of PCW stored at the facility in Tanks 81 and 82 does not exceed 10,000 gallons at any given time. PCW remains on-site for 2-3 weeks before the recovered product is transported off-site. Outgoing shipments of recovered product are checked for percent water, TOH, and flashpoint and are shipped as off-specification fuel to a marketer. Mr. Turovsky stated that there are never any residual solids in the bottom of the PCW tanks.

PCW Records Review

Manifests were reviewed and included all required information for acceptance records, with the exception of the producer and transporter address which were included in the electronic database. Written assurance that PCW does not contain levels of hazardous constituents above those found in the source are included in the profile certification signed by the producers. A determination of the quantity of product in a particular load is based on analysis of the COLIWASA sample and used to calculate quantities listed in the annual reports.

All sales transactions are recorded electronically on an LES bill of lading and retained on-site for a minimum of three years.

PCW records and annual reports for the previous three years were reviewed and appeared to be in order at the time of the inspection. PCW tanks are being inspected daily and documented on the "SPCC Weekly Inspection Log" weekly.

Wastewater Treatment Area

The Wastewater Treatment Area is primarily located in the southeast corner of the facility. Fifteen tanks are dedicated to Wastewater Treatment with a total capacity of 247,150 gallons. The Wastewater Treatment Area consists of the following tanks: Tanks 7 and 8 (22,000 gallons each), Tank 9 (23,000 gallons), Tank 30 (500 gallons), Tank 31 (10,000 gallons), Tanks 32-34 (12,000 gallons each), Tank 35 (10,000 gallons), Tank 35A (11,650 gallons), Tanks 36 and 37 (20,000 gallons each), Tanks 38 and 39 (30,000 gallons each) and Tank 98 (12,000 gallons).

LES accepts only non-hazardous, non-biological industrial wastewater. Wastewater is derived from petroleum storage facilities, industrial processes, landfill leachate collection systems, tank cleaning, transportation and environmental remediation sources. Wastewater is received primarily from tank and vacuum trucks.

Accepted shipments of wastewater are off-loaded at one of three receiving stations located in front of the facility. Depending on the waste stream profile, wastewater is transferred to the oil/water separator, and then transferred to the DAF Unit, Inlet, and Clarifier tanks. In the DAF tanks, wastewater liquids are chemically treated to adjust the pH which induces coagulation and flocculation. Separated solids/sludge/residues are transferred to the Plate and Frame Filter Press Area for further processing as described below.

The treated wastewater is then discharged to the JEA POTW at Buckman Street under IUD Permit #019. The wastewater discharge is monitored for permit compliance in a utility building located on site.

Plate and Frame Filter Press Area (PFFPA)

The PFFPA tanks are located to the left of the main gate entrance to the facility and on the east side of the facility (Photo 14). Ten tanks are dedicated for the PFFPA with a total capacity of 89,500 gallons. The PFFPA tanks consists of: Tanks 61 and 62 (8,000 gallons each), wastewater solids Tank 60 (12,000 gallons), oily water slurry Tank 70 (9,500 gallons), DAF solids Tanks 89 and 90 (10,000 gallons each), FPA slurry Tanks 93 and 94 (12,000 gallons each) and the Plate and Frame Filter Press (PFFP) waste solids Tanks 95 and 96 (4,000 gallons each).

Waste solids collected from the wastewater and DAF tanks are transferred to the slurry tanks with combined liquids from the oily water slurry tank. The waste solids in the processing tanks are pH-adjusted by addition of a lime slurry from Tank 99 (1,000 gallons), ferric chloride from drums or zinc chloride from a small holding

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tank. The pH-adjusted slurry is then transferred to the PFFP waste solids tanks. In the PFFP waste solids tanks, treated waste solids are transferred into the PFFP. In between dewatering cycles, a pre-coat chemical is applied to the PFFP from Filter Press Pre-Coat Tank 97 (1,000 gallons). This process ensures dewatered waste solids are dropped into an awaiting roll-off.

LES performs two Toxicity Characteristic Leaching Procedure (TCLP) analytical test per quarter on a random roll-off containing the dewatered waste solids from both the PFFP and the Solidification Pits described below. The facility was requested to perform the analysis once per quarter on the PFFP waste stream and the solidification waste stream separately, since these are two different waste streams. The dewatered waste solids are transported by Advanced Disposal Jacksonville and disposed of at the Camden County, Georgia Municipal Waste Landfill approximately four to five times per week. The most recent analytical reports dated April 1, 2019 and April 30, 2019, were reviewed and the results indicated that the waste solids were non-hazardous.

Solidification Pits

Two open, concrete and steel lined Tanks, 61 and 62, are dedicated for solids and sludge solidification and have a total capacity of 16,000 gallons (Photo 15). The facility is authorized under its solid waste permit to generate wastewater treatment solids and oily solids waste from the facility's wastewater treatment processes and used oil processing.

A heavy screen cage is used to physically separate the liquids from the solids in each tank. Facility staff use a large suction hose to transfer the oily waste liquid to the oil/water separator. Removal of liquid oily waste from the tank during the solidification process reduces the overall waste volume. Bails of absorbent paper dust material are used for solidification of leftover tank sludge. Waste solids are placed into the same roll-off containers used for the PFFP waste solids that are transported by Advanced Disposal Jacksonville to the Camden County, Georgia Municipal Waste Landfill approximately four to five times per week. The most recent TCLP analytical report dated April 1, 2019 and April 30, 2019, were reviewed, and the results indicated that the waste solids were non-hazardous.

Used Oil Filter and Container Storage Area

The Container Storage Area is approximately 1,000 square feet (Photo 16). The facility stores non-hazardous waste, oil contaminated solid waste and other waste for solidification in this area. The facility also stores chemicals, such as off-specification caustics, that can be used in the process. All drums were stored on an oil-impervious surface.

The facility is a registered used oil filter processor and transporter, however, the facility does not currently transport or process the used oil filters. Mr. Turovsky said that the facility receives a very small number of used oil filters which are shipped off-site for recycling one or two times per year. The filters arrive at the facility in drums, and any free liquids inside the drum are pumped out and processed as used oil prior to off-site disposal.

After removal of any free liquids, the drums are placed onto a rack in the Used Oil Filter and Container Storage Area until they can be picked-up for management by Safety Kleen (FLD 980 847 214). At the time of the inspection, the facility had one drum of used oil filters onsite (Photo 17). The drum was closed, properly labeled with the words "Used Oil Filters" and stored on an oil-impervious surface.

Used Oil Filter and Container Storage Area Records

Used oil filters were last transported by Safety Kleen on April 5, 2018. Used oil filter transportation records appeared in order.

Records indicate that the facility delivered, processed and disposed of 8,638 gallons of oil contaminated solid waste in 2018. The facility is reminded that the permit issued January 19, 2018 requires that these records be maintained for three years.

Transportation Area

LES primarily accepts shipments from third party carriers, however, LES is registered as a Used Oil

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Transporter and occasionally transports the wastes treated at the facility. Mr. Turovsky stated that used oil is not stored in trucks for more than 24 hours and is typically unloaded or dispatched immediately.

The Transportation Area is a large sand lot where the facility parks its tanker trucks, disconnected semi-truck trailers and tankers (Photo 18). Several empty drums, tanks and grease receptacles were also observed in this area. Empty drums that cannot be used are disposed of as scrap metal.

No hazardous waste is generated in this area. Mr. Turovsky said that all vehicles are serviced off site and that no used oil or used oil filters are generated. There were no containers accumulating in these areas.

Transportation Records

Although the facility screens each load of used oil it transports upon arrival at the facility and rejects loads as appropriate, halogen screening is not conducted prior to transport [40 CFR 279.44(a)].

Training provided for used oil transportation personnel includes a review of the state and federal used oil regulations, review of halogen screening requirements and procedures, emergency response procedures and review of the Spill Prevention, Control, and Countermeasures (SPCC) Plan/Contingency Plan. Mr. Turovsky stated during the meeting on July 8, 2019, that further clarification regarding halogen screening required by drivers prior to transport has been added to the training, which is provided to both plant personnel and drivers. Training records appeared to be in order.

Grease Waste Processing Area

The facility processes grease waste that is exempt from industrial discharge requirements. Grease waste is screened for large solids in Tank 115 (4,000 gallons) and then placed into Tank 110 (20,000 gallons), Tank 111 (20,000 gallons), Tank 112 (37,000 gallons), Tank 113 (37,000 gallons) or Tank 114 (37,000) for gravity separation (Photo 19). Liquids generated by this process are then processed as wastewater. Solids are sent to an LES facility in Kissimmee, Florida for separation of the brown solids by centrifuge. These brown solids are then marketed as a product.

Maintenance Shop

The maintenance shop has been relocated to the far northeastern corner of the facility adjacent to Seventh Street (Photo 20). The maintenance shop performs routine and preventative maintenance for the facility. A small amount of painting and welding is conducted. Xylene (flashpoint 86°F) is used to thin paint. Xylene used for paint cleanup would generate a D001/F003 hazardous waste. Unused xylene would generate a D001 hazardous waste. Unused paint may also generate a D001 hazardous waste. A hazardous waste determination should be conducted prior to disposal of unused paint to determine if additional hazardous waste codes are required. No rags are used for painting.

No used oil is generated by the maintenance shop. There was, however, one used oil rag step can located in the shop. Rags are laundered weekly by Aramark.

Scrap welding rods are managed as scrap metal.

Per Mr. Turovsky, no lead acid batteries are generated at the facility. All truck maintenance is conducted off-site.

Spent fluorescent bulbs are managed through the purchase of a pre-paid container that is shipped to Veolia for recycling.

Record Review

LES is currently operating as a VSQG of hazardous waste for small amounts of lab waste. The COD waste is transported by AERC Acquisition Corporation – FL (FLD 984 262 782) and manifested off-site to AERC Acquisition Corporation -PA (PAD 987 367 216). Waste was last transported on April 23, 2019.

The facility had its current "Used Oil" registration form displayed from the Department and has submitted its current certificate of liability insurance. LES has also submitted its 2018 Used Oil and PCW annual report to

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the Department's Tallahassee office.

LES operating records, including internal inspections, financial assurance statements and personnel training were reviewed and appeared to be in order. Tank and container inspections required by the permit are documented on the "SPCC Weekly Inspection Log," STI SP001 Monthly Inspection Checklist" and "SPCC Monthly Spill Contingency Inventory" forms.

The SPCC/Contingency Plan was last reviewed on April 26, 2019. The SPCC/Contingency Plan required updating of emergency equipment locations and maintenance shop location as previously noted. The facility appeared to have adequate safety, spill, and decontamination equipment available. According to inspection records, LES tests and maintains required equipment for communications, fire protection, spill control, and decontamination as necessary to ensure proper operation in time of emergency.

*****NOTE: As of June 18, 2018, the State of Florida has adopted the recently-updated Federal hazardous waste rules, more commonly known as the Generator Improvement Rule. As a generator of hazardous waste, your facility is impacted by the rule change.

Please see the eCFR site for a copy of the Federal rule at - https://www.ecfr.gov/cgi-bin/text-idx?SID=ab7ac7e8d2fb42037c72a0de5162bcfe&mc=true&tpl=/ecfrbrowse/Title40/40cfrv28_02.tpl#0

The November 28, 2016, Federal Register also has a good discussion about the new requirements - <https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-27429.pdf>

Copies of PowerPoints that discuss the new requirements may also be found here - <https://floridadep.gov/northeast/ne-compliance-assurance/content/compliance-assurance-resources>

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:	279.44(a)
Explanation:	Facility was not conducting the required halogen screening prior to transportation of used oil.
Corrective Action:	In order to return to compliance, the facility should determine whether the total halogen content of used oil being transported is above or below 1,000 ppm and maintain records for three years.

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Type: Violation
Rule: 279.54(d)(2)

Explanation: There were several areas of the south wall of the used oil secondary containment system with significant cracks, gaps and areas of disrepair that could potentially allow a release. There was vegetation and debris observed along the interior south wall in the area where the foundation and vertical wall meet and along the exterior south wall, making performing an adequate inspection of the secondary containment difficult.

Corrective Action: In order to return to compliance, the facility should clear all debris and vegetation in the vicinity of all secondary containment perimeter walls to allow for adequate inspection. The facility should also repair any cracks, gaps and areas of disrepair and have the entire secondary containment area inspected and certified by a Professional Engineer as to its ability to contain a release and provide the required secondary containment.

PHOTO ATTACHMENTS:

Photo 1

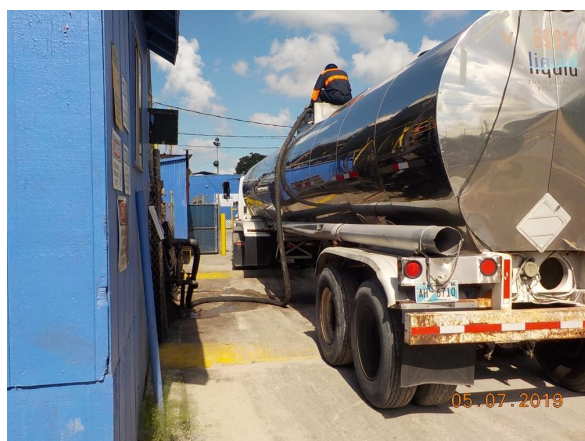


Photo 2



Photo 3



Photo 4



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Photo 5



Photo 6

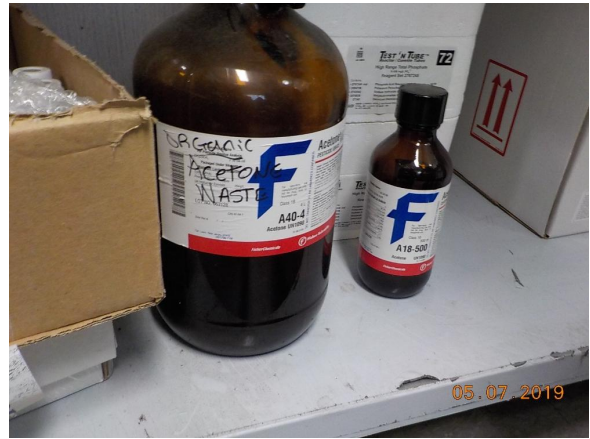


Photo 7



Photo 8



Photo 9



Photo 10



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Photo 11



Photo 12



Photo 13



Photo 14



Photo 15



Photo 16



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Photo 17



Photo 18



Photo 19



Photo 20



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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.

Bonnie M Bradshaw	Inspector
Principal Inspector Name	Principal Inspector Title

	DEP	07/19/2019
Principal Inspector Signature	Organization	Date

Yuri Turovsky	Plant Manager
Representative Name	Representative Title

Liquid Environmental Solutions
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: <u>Bonnie M Bradshaw</u>	Inspection Approval Date: <u>07/19/2019</u>
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