



FLORIDA DEPARTMENT OF Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 12, 2024

Mr. Shawn Northcraft, Service Manager
Flagler Construction Equipment
8750 Philips Highway
Jacksonville, Florida 32256
snorthcraft@flaglerce.com

Re: Alta Construction Florida, LLC
Facility ID No.: FLR000213694
Duval – Hazardous Waste Program

Dear Mr. Northcraft:

Department personnel conducted a compliance inspection of the above-referenced facility on December 7, 2023, 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 62-710 and 62-730, Florida Administrative Code, were 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:

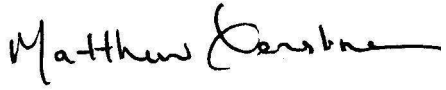
1. Describe what has been done to resolve the non-compliance issue or provide a time schedule describing how/when the issue will be addressed;
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit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

Alta Construction Florida, LLC
Facility ID No.: FLR000213694
Compliance Assistance Offer
Page 2 of 2

Please address your response and any questions to Cheryl L. Mitchell of the Northeast District Office at 904-256-1620, or via e-mail at Cheryl.L.Mitchell@FloridaDEP.gov. We look forward to your cooperation in this matter.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matthew Kershner
Environmental Manager
Compliance Assurance Program

Enclosure: Inspection Report

cc: DEP: Matt Kershner, Bonnie Bradshaw, Cheryl L. Mitchell, DEP_NED



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

FACILITY INFORMATION:

Facility Name: Alta Construction Florida LLC

On-Site Inspection Start Date: 12/07/2023

On-Site Inspection End Date: 12/07/2023

ME ID#: 114929

EPA ID#: FLR000213694

Facility Street Address: 8750 Philips Hwy, Jacksonville, Florida 32256-8215

Contact Mailing Address: 8750 Phillips Hwy, Jacksonville, Florida 32256

County Name: Duval

Contact Phone: (904) 737-6000

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG Used Oil: Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Generator Facility

Routine Inspection for Used Oil Transfer Facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Shawn Northcraft, Service Manager

LATITUDE / LONGITUDE: Lat 30° 12' 26.9707" / Long 81° 34' 43.5904"

NAIC: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Alta Construction Florida, LLC (Alta, the facility) was inspected on December 7, 2023. The facility was last inspected by the Department's Hazardous Waste Program on December 17, 2019. The facility is registered and operating as a Used Oil Transporter and Transfer Facility, a Used Oil Filter Transporter and Transfer Facility, a used oil generator, and a Very Small Quantity Generator (VSQG) of hazardous waste. Shawn Northcraft (Alta) and Matt Kershner (the Department) were present throughout the inspection.

Alta sells, rents and services trucks, heavy equipment, and associated parts. Maintenance work is performed both in the field and at the facility. Alta has been in operation at this location since 2014 and has approximately 30 employees. Alta leases the property, including two adjoining parcels, and the facility uses a private well and septic tank. Hours of operation are Monday thru Friday from 7:00 am – 5:00 pm, and on call as needed. The facility consists of a main building with offices and a Warehouse and Maintenance Area, and an Outside Yard. The areas inspected are described below.

Process Description:

MOBILE SERVICING

Alta services heavy equipment and trucks in the field. The facility transports only its own used oil generated at its own non-contiguous operations. Used oil and used oil filters generated during field servicing activities are transported back to the facility and accumulated with the wastestreams generated at the facility. The facility operates one field maintenance truck that is equipped with a 250-gallon used oil recovery tank, two product

Inspection Date: 12/07/2023

tanks, and a used oil filter container. The truck was not on site at the time of inspection. The used oil and used oil filters generated in the field are added to a used oil tank and used oil filter containers located in the Maintenance Area described below.

WAREHOUSE AND MAINTENANCE AREA

The majority of the main building is used for maintenance activities (Photo 1). Offices are along the eastern side of the building. Equipment and materials are stored around the southern and western perimeter of the building, and in the northeastern corner of the building. The remainder of the building is used for maintenance on diesel powered trucks and heavy equipment. Used oil is drained into drip pans or mobile carts located throughout the area. Several of the used oil containers were not labeled "Used Oil" (Photos 2 and 3) [40 CFR 279.22(c)(1)]. Used oil is drained from the drip pans and mobile carts into a larger collection container in the center of the area and then pumped to a double-walled 500-gallon aboveground storage tank located against the wall of the maintenance area. The tank was closed, labeled and in good condition. Used oil filters and oily absorbents are accumulated in 55-gallon drums located inside the maintenance area. All of the used oil filter drums and containers were closed and labeled. Oily absorbents are managed as non-hazardous waste. If antifreeze has to be drained from a vehicle, the facility collects the antifreeze and re-uses it in the vehicle once maintenance is complete. If the antifreeze is not reusable, it is collected and disposed on an as-needed basis.

The facility has one Safety-Kleen 30-gallon Premium Solvent parts washer located in the area. The parts washer is serviced by Safety-Kleen every eight weeks to twelve weeks and managed as D039 hazardous waste liquid.

Alta uses Volvo Non-Chlorinated Brake Cleaner (flashpoint -4°F) and Volvo Multi-Purpose Degreaser (flashpoint -4°F) on wipes for cleaning. Spent Volvo brake cleaner and Volvo degreaser are non-hazardous when used on a rag. Technicians will sometimes use Torq CB Cherry Corrosion Buster (65-75% methylene chloride; flashpoint: flammable aerosol) on a launderable wipe. Wipes used with Brake Cleaner or Multi-Purpose Degreaser would be a non-hazardous waste if disposed. Wipes used with Corrosion Buster would generate an F002 hazardous waste if disposed, or could be managed as "Excluded Solvent Contaminated Wipes" in accordance with 40 CFR 261.4(a)(26) if laundered. Wipes from the maintenance area are accumulated in 5-gallon step cans located in the front of the maintenance area and are laundered weekly by Cintas. Because the wipers weren't being managed as hazardous waste or Excluded Solvent Contaminated Wipes, the facility wasn't ensure proper disposal of this wastestream [40 CFR 262.14(a)(5)].

Indoor Paint Booth

In 2023 Alta installed a walk-in paint booth to prepare for an increase in its painting operations (Photo 4). Mr. Northcraft stated that the City of Jacksonville had reviewed the operation of the booth for applicable emissions standards. Excess paint is placed in the 55-gallon drum underneath the aerosol can puncturer described below. Pocket filters, masking paper, and PPE are managed as non-hazardous waste. The facility had TCLP metals analysis from August 2023 that supported this process.

Alta primarily uses Volvo paints (various flashpoints <140°F) for larger equipment, but can also use PPG and Advanced Industrial Coatings (various flashpoints <140°F) depending upon the customers' requirements. Acetone (flashpoint: 4°F) or Crown Lacquer Thinner (25-25% methanol, 15-25% acetone, 8-25% toluene; flashpoint: 3.2°F) to clean spray guns and on disposable rags for cleanup. Crown Lacquer Thinner when used on disposable rags would generate an F003/F005 hazardous waste if disposed, or could be managed as "Excluded Solvent Contaminated Wipes" in accordance with 40 CFR 261.4(b)(18). Wipes from the painting process are thrown in the trash (Photo 5) which isn't ensure proper disposal of this wastestream [40 CFR 262.14(a)(5)]. Used acetone and thinner are placed in the 55-gallon drum underneath the aerosol can puncturer described below.

Alta also uses aerosol paints for minor touch-ups and to stencil information on equipment and vehicles. The stencils are metal and are recycled as scrap metal when no longer useable. No brushes, rollers or rags are

Inspection Date: 12/07/2023

used during touch-up or the stenciling process. Spent aerosol cans are collected and punctured in the facility's aerosol can drum-top puncturing device located in between the paint booth and the maintenance areas (Photo 6). After puncturing, the empty aerosol cans are recycled as scrap metal. Because the puncturer was open, the hazardous waste liquid in the drum was allowed to evaporate and not be properly disposed [40 CFR 262.14(a)(5)]. The facility has not disposed of this wastestream, but is reminded that it should make an accurate waste determination on the wastestream prior to disposal for TCLP metals, TCLP VOCs, and flashpoint.

OUTSIDE YARD

This area consists of two parcels of property that are both owned by the same owner. The area is north of the main building and is largely unpaved, compacted soil. There is a small, paved area near the office entrance to the main building that is used for customer and employee parking. The following operations were observed in the remainder of the unpaved area.

Wash Rack

In 2022 Alta installed an ESD Waste-2-Water closed-loop wash rack (Photo 7) to clean heavy equipment. The wash rack is operated under an Industrial Wastewater Facility permit (#FLAB07216). The system is designed to process suspended solids through a mechanical separation and filtration system that drops the solids out of suspension to be collected in a separate hopper (Photo 8) and allows the wash water to be recycled. Sun Professional Super Wash (pH 11.9-12.4) is diluted according to manufacturer's instructions and hand-sprayed on equipment and then rinsed off. Mr. Northcraft said that the system is cleaned out periodically to prevent buildup and the wash water and solids are managed as non-hazardous waste by Heritage-Crystal Clean. The facility has not made a hazardous waste determination on these wastestreams to support this process [40 CFR 262.11].

Abrasive Media Blasting Area

The facility had recently begun an abrasive blasting process in this open area of the yard north of the wash rack area. A portable blaster that uses RockRidge Garnet media is used to remove rust from painted and unpainted buckets and wheel rims on heavy equipment (Photo 9). The blast media had been allowed to accumulate on the soil. The facility has not made a hazardous waste determination on the spent media [40 CFR 262.11]. Even if the spent blast media is determined to be non-hazardous waste, it is a solid waste and cannot be discarded on the soil so the facility should ensure it implements routine maintenance procedures to contain, clean-up, and properly dispose of the spent media to ensure compliance with solid waste regulations and stormwater best management procedures. The Department will provide additional information on compliance requirements for these programs in separate correspondence.

Vehicle Storage and Staging Yard

The remainder of the Outside Yard is used as a laydown area for materials and to stage equipment for sale, lease and/or maintenance (Photo 10). Dumpsters for solid waste and scrap metal are also located in this area. No maintenance is performed in the yard but one 5-gallon bucket that was unlabeled but appeared to be used oil was observed in the area (Photo 11) [40 CFR 279.22(c)(1)]. An oil filter was also observed on the ground in the area, but Mr. Northcraft retrieved the filter and determined that it was unused.

Records Review

Alta is currently operating as a Used Oil Transporter and Transfer Facility, a Used Oil Filter Transporter and Transfer, and a VSQG of hazardous waste. Records reviewed included hazardous waste disposal records, used oil disposal records, annual transporter registration, and insurance liability coverage. The facility's Used Oil Transporter registration was posted at the facility. All records reviewed appeared to be in order unless otherwise described herein.

Lead-acid batteries are exchanged through Battery Distributors. Scrap metal is recycled by AAction Recycling.

Inspection Date: 12/07/2023

Heritage-Crystal Clean (HCC, ILR000130062), currently manages the facility's solids and liquids from the wash rack.

Safety-Kleen (TXR000081205) manages the spent solvent as D039 hazardous waste. The facility is reminded that if the parts washer equipment, vendor and/or maintenance process changes in the future that it should conduct a hazardous waste determination prior to disposal of the spent solvent for TCLP metals, TCLP VOCs, and flashpoint.

Safety-Kleen or HCC, depending upon corporate contracts, manages the facility's used oil, used oil filters and oily absorbents. Safety-Kleen performed the previous used oil pick-up on October 5, 2023, and used oil filter pick-up on November 7, 2023.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation 1
Rule:	262.11
Explanation:	<p>The facility failed to make a hazardous waste determination on the following wastestreams:</p> <ol style="list-style-type: none">1. Solid debris generated from cleaning the ESD Waste-2-Water wash rack;2. Wash water generated from cleaning ESD Waste-2-Water wash rack; and3. Spent abrasive garnet media generated from blasting operations in the Outside Yard.
Corrective Action:	<p>In order to return to compliance, the facility should conduct and fully document a hazardous waste determination by having a representative sample of the wastestreams listed below analyzed separately for the following:</p> <ol style="list-style-type: none">1. Solid debris: Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals pursuant to 40 CFR 261.24, via method 6010;2. Wash water: TCLP for RCRA metals pursuant to 40 CFR 261.24, via method 6010; and corrosivity pursuant to 40 CFR 261.22, via method 9040; and3. Spent abrasive media: the spent media on the ground should be collected in a roll-off or individual containers and a representative sample should be collected from the container(s) and analyzed for TCLP for RCRA metals pursuant to 40 CFR 261.24, via method 6010.

The samples are to be analyzed by a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory. The NELAP certified laboratory shall also hold certification from the Florida Department of Health, Environmental Laboratory Certification Program (DOH ELCP) for all matrices/test methods/analytes being measured. A copy of the lab results should be submitted to the inspector listed on page 1 of this report. All samples are to be collected and analyzed in accordance with EPA publication SW#846 "Test Methods for Evaluating Solid Waste" 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, FAC. This regulation stipulates that samples analyzed for volatile organic compounds via method 8260 shall be preserved, within 15 minutes of collection until delivery to the laboratory, at a temperature between 4°C and 6°C. Samples that do not conform to the required preservation temperature may be rejected. Alternative methods for hazardous waste determinations should be approved by the Department. These wastes are not to be disposed of until written approval has been given by the Department. Once approval has been given, hazardous waste should be sent off-site to a permitted Treatment, Storage, and Disposal Facility (TSDF), and non-hazardous waste should be sent to a treatment facility that is authorized to treat the waste. Further enforcement action may be taken based on the analytical results.

Inspection Date: 12/07/2023

Type: Violation 2
Rule: **262.14(a)(5)**
Explanation: The facility failed to ensure proper disposal of the following wastestreams:
1. Launderable wipes generated from vehicle maintenance performed in the Maintenance Area;
2. Shop rags generated from painting operations performed in the Maintenance Area; and
3. Aerosol can puncturing liquids, paint and thinner accumulating in the Maintenance Area.
Corrective Action: In order to return to compliance, the facility should complete the following actions:
1. Manage the launderable wipes either as hazardous waste, or as Excluded Solvent Contaminated Wipes in accordance with 40 CFR 261.4(a)(26).
2. Manage the disposable shop rags either as hazardous waste, or Excluded Solvent Contaminated Wipes in accordance with 40 CFR 261.4(b)(18).
3. No further action is required. The facility returned to compliance with an email from 12/20/2023.

Type: Violation 3
Rule: **279.22(c)(1)**
Explanation: The facility failed to properly label containers of used oil with the words "Used Oil" in the Maintenance Area and in the Vehicle Storage and Staging Yard.
Corrective Action: No further action is required. The facility returned to compliance with emails on 12/20/2023 and 02/21/2024.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



Inspection Date: 12/07/2023

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			✓

Inspection Date: 12/07/2023

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Cheryl L Mitchell
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

02/21/2024
Date

Shawn Northcraft
Representative Name

Service Manager
Representative Title

Atla Equipment Company
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Cheryl L Mitchell

Inspection Approval Date: 02/21/2024