



# 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

May 30, 2024

Mr. Tim Jackson, Production Manager  
Flagler Construction Equipment  
1299 W. Beaver Street  
Jacksonville, FL 32204  
[tim@marinecleaning.com](mailto:tim@marinecleaning.com)

**Re: Atlantic Marine Cleaning, LLC**  
**Facility ID No.: FLR000258301**  
**Duval – Hazardous Waste Program**

Dear Mr. Jackson:

Department personnel conducted a compliance inspection of the above-referenced facility on March 12, 2024, 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.

Atlantic Marine Cleaning, LLC  
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Compliance Assistance Offer  
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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](mailto: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 the first name "Matthew" being more legible than the last name "Kershner".

Matthew Kershner  
Environmental Manager  
Compliance Assurance Program

Enclosure: Inspection Report

ec: DeeAnn Koenig ([dee@marinecleaning.com](mailto:dee@marinecleaning.com))

FDEP-NED: Matt Kershner, Bonnie Bradshaw, Cheryl L. Mitchell, DEP\_NED



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

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**FACILITY INFORMATION:**

**Facility Name:** Atlantic Marine Cleaning LLC

**On-Site Inspection Start Date:** 03/12/2024

**On-Site Inspection End Date:** 03/12/2024

**ME ID#:** 153746

**EPA ID#:** FLR000258301

**Facility Street Address:** 1299 W Beaver St, Jacksonville, Florida 32204-1409

**Contact Mailing Address:** 1299 W Beaver St, Jacksonville, Florida 32204

**County Name:** Duval

**Contact Phone:** (904) 350-0006

**NOTIFIED AS:**

SQG (100-1000 kg/month), Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** SQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** Transporter, Used Oil, Oil Filters

**Other:** Transport

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Hazardous Waste Transporter Facility

Routine Inspection for Used Oil Generator Facility

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

**INSPECTION PARTICIPANTS:**

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Tim Jackson, Production Manager

**LATITUDE / LONGITUDE:** Lat 30° 20' 11.076" / Long 81° 40' 31.1628"

**NAIC:** 562998 - All Other Miscellaneous Waste Management Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Atlantic Marine Cleaning, LLC (AMC, the facility) was inspected on March 12, 2024. AMC has not previously been inspected by the Department's Hazardous Waste Program at this location. However, AMC was inspected by the Department on March 17, 2020, at its former location when it conducted transporter operations under EPA ID#FLD032383945. AMC notified the Department that it is closed that location in November 2022. AMC notified the Department as a Used Oil (UO), Used Oil Filter (UOF), Hazardous Waste, and Petroleum Contact Water (PCW) Transporter; and a Small Quantity Generator (SQG) of hazardous waste for its current location on October 10, 2022. Mr. Tim Jackson, Production Manager, was present throughout the inspection. Ms. DeeAnn Koenig, Administrative Manager, was present during the records review.

At the time of the inspection, the facility was operating as UO/UOF/PCW/Hazardous Waste Transporter and as a Very Small Quantity Generator (VSQG) of hazardous waste. AMC currently has 15 employees and operates Monday through Friday, 6:30 AM to 3:30 PM, and infrequently on weekends depending upon workload. The facility is connected to city water and sewer.

AMC provides services primarily to maritime and military vessels including industrial tank cleaning; wastewater and bilgewater management; vacuum truck services; used oil and used oil filter transportation; PCW transportation; and hazardous waste transportation. AMC operates two "all-in-one" vacuum trucks, two flatbed trucks, one box truck, four trailers for materials and equipment, and four vacuum tanks. General maintenance of fleet vehicles is performed on-site. The facility property includes two buildings, a vehicle parking lot, and various storage and laydown areas outside and adjacent to each building. The main building contains offices and a Warehouse Area; the second building contains a Storage Area. The areas inspected are described below.

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**Process Description:****USED OIL TRANSPORTER**

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AMC primarily transports non-hazardous wash water generated during tank cleaning, and bilgewater removed from vessels. Mr. Jackson stated that on occasion AMC is requested to pump-out oil from a tank prior to cleaning, or transport small quantities of used oil generated from maintenance activities on board the vessel. The used oil is transported in drums, totes or vacuum trucks directly to Water Recovery Inc. (WRI, FLR000069062) or Liquid Environmental Solutions of Florida (LES, FLD981928484) for processing within one day of receipt. AMC is not a registered used oil transfer facility.

**Used Oil Transporter Records Review:**

AMC maintains shipping documents and used oil records for used oil that is accepted for transport for a period of three years. Mr. Jackson stated that AMC drivers conduct halogen screening on used oil prior to transport using a PID, but the results had not been documented on several 2023 used oil shipping documents [62-710.510 (1)(g), FAC]. The used oil logs for 2023 did not include the EPA ID# for several customers [62-710.510(1)(a), FAC].

**USED OIL FILTER TRANSPORTER**

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AMC occasionally provides used oil filter transporter services for vessels who generate minor amounts of used oil filters during maintenance activities on board the vessel. Used oil filters are collected in drums and transported in a box truck to WRI for processing within one day of receipt. AMC is not a registered used oil filter transfer facility.

**Used Oil Filter Transporter Records Review:**

AMC maintains shipping documents and used oil filter records for used oil filters that are accepted for transport for a period of three years. All records reviewed appeared to be in order.

**HAZARDOUS WASTE TRANSPORTER**

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AMC provides hazardous waste transporter services only for minor quantities of hazardous waste on an infrequent basis. If requested, hazardous waste is transported to Perma-Fix of Florida (FLD980711071) for processing within one day of receipt. AMC is not a registered hazardous waste transfer facility.

**Hazardous Waste Transporter Records Review:**

AMC maintains manifests for hazardous waste that is accepted for transport for a period of three years. AMC transported one 55-gallon drum of hazardous waste resin in July 2023 to Perma-Fix within one day of receipt.

**PETROLEUM CONTACT WATER (PCW) TRANSPORTER**

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AMC occasionally transports PCW that is generated during tank cleanings. PCW is transported in vacuum trucks directly to either WRI or LES for processing within one day of receipt.

**Petroleum Contact Water Transporter Records Review:**

AMC maintains shipping documents for PCW that is accepted for transport for a period of three years. All records reviewed appeared to be in order.

**MAIN BUILDING - WAREHOUSE AREA**

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The main building on the property includes office and training spaces along the southeastern portion of the building, materials and equipment storage in the southwestern portion, a small maintenance area is located in the northwestern portion, and supplies and out of service equipment are stored in the northeastern portion of the building (Photo 1).

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General maintenance is performed on AMC's vehicles and equipment, including oil and oil filter changes, in the maintenance area. Used oil and filters are accumulated in the adjacent building's Storage Area described below (Photo 2). Oily shop rags are collected in a lined fiberboard tri-wall in the Storage Area and managed as non-hazardous waste and disposed through WRI (Photo 3). Various lubrication and cleaning products are used by technicians depending upon the type of equipment being repaired and maintained. Products observed in flammable storage lockers in this area included: Rustoleum aerosol paints in several colors (no RCRA metals; flashpoint: 106°F) that are used for touch-up painting; Klean Strip Paint Thinner (flashpoint: >100°F) that is used for paint clean-up; aerosol CRC Brakleen Brake Parts Cleaner (90-100% tetrachloroethylene; DOT compressed gas) and aerosol CRC Lectra-Motive Electric Parts Cleaner (90-100% tetrachloroethylene; DOT compressed gas) that are used to clean parts and motors; Oatey Medium Blue PVC Cement (5-15% MEK; flashpoint 14°-23°F) and Oatey Purple Primer (15-30% MEK; flashpoint 14°-23°F) that are used for PVC pipe assembly. Klean Strip when used on a rag would generate a non-hazardous solid waste. Excess Klean Strip would generate a D001 hazardous waste liquid. The CRC products when used with a rag would generate an F002, and potentially a D039, hazardous waste solid. The Oatey products when used with a rag would potentially generate a D035 hazardous waste solid. Excess Oatey products would potentially generate a D035 hazardous waste liquid. The facility had not made an accurate hazardous waste determination on its shop rags [40 CFR 262.11].

Aerosol cans are punctured in a drum-top aerosol can puncturer attached to a 55-gallon drum that is located in the Storage Area, described below.

An abrasive media glove box that uses plastic media is located in the materials and equipment storage area. Mr. Jackson said that the unit is used infrequently to remove rust from small metal parts. Waste media has not been disposed yet, but the facility is reminded that an accurate hazardous waste determination will be required prior to disposal.

Lead-acid batteries are exchanged through Napa Auto Parts. Scrap metal is recycled by Berman Brothers.

Outside the main building on the northside, AMC stages CONEX boxes that are used for additional materials and equipment storage.

## SECOND BUILDING – STORAGE AREA

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The second building on the property is located to the southeast of the main building (Photo 4). The majority of the building space is used for equipment storage. The used oil, used oil filter, and shop rags accumulation containers, and the aerosol can puncturer, are located in the northwest corner of the building to the left of the roll-up door. At the time of the inspection, there was one 55-gallon drum of used oil and one 55-gallon drum of used oil filters accumulating (See Photo 2). Both containers were properly labeled, and located within adequate secondary containment. There were product oil drums and a tote also located in this area. The drum of aerosol can liquid was closed. The punctured cans are recycled as scrap metal. No liquid waste has been disposed yet, but the facility is reminded that an accurate hazardous waste determination will be required prior to disposal.

## VEHICLE PARKING AND OUTDOOR LAYDOWN AREA

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South of the main building is a parking lot for AMC's trucks, trailers and tankers (Photo 5). There was one vehicle in the area that is used to transport used oil. The vehicle had the appropriate transporter registration and insurance certificates in the cab.

Immediately south of the second building and to the east of the vehicle parking area was a long, narrow section of the property that was partially grassed (Photo 6). The area is used to stage equipment, trailers, and hoses. The hoses are washed in a paved portion of the parking area adjacent to the second building using Zep Concentrate All-In-One Premium Pressure Wash (pH: 11.5-12.5) and Dawn Professional Dish Detergent. AMC uses detachable hoses to pump-out vessel bilges and tanks. The hoses are washed with Dawn or a 1:20

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dilution of Zep and water and the washwater is discharged into a tote or tank. The washwater solution is circulated through the hoses until personnel determine they are clean. After washing, the hoses are drained into the tote or tank, and are then placed along the asphalt path to air-dry. In one area along the path, the asphalt was stained and the grass/dirt adjacent to the stained area was discolored (Photo 7) [40 CFR 279.22(d)].

RECORDS REVIEW

At the time of the inspection, the facility was operating as a VSQG, but wants to remain notified as a SQG due to the potential to generate increased quantities of hazardous waste in the future. Training records are maintained for a period of three years and appeared to be in order. The required insurance certificate was current, and the certificates for the Used Oil, Used Oil Filter, and Hazardous Waste Transporter Registration were posted at the facility. AMC had submitted its annual Used Oil and Used Oil Filter Report by March 1 as required. All records reviewed appeared to be in order unless otherwise described above.

New Potential Violations and Areas of Concern:

Violations

Type: Violation 1  
Rule: 262.11  
Explanation: The facility failed to make an accurate hazardous waste determination on its disposable shop rags.  
Corrective Action: In order to return to compliance, the facility should make an accurate hazardous waste determination on its shop rags that are used for cleaning by having a representative sample of the rags from each maintenance process analyzed for the following:  
- Toxicity Characteristic Leaching Procedure (TCLP) for volatiles, pursuant to 40 CFR 261.24, via method 8260.  
  
Alternatively, the facility could conservatively manage its disposable shop rags with CRC products as F002/D039 hazardous waste, and its shop rags with Oatey products as D039 hazardous waste. Or, the facility could manage its disposable shop rags used with these products as Excluded Solvent-Contaminated Wipes (ESCW) in accordance with 40 CFR 261.4(b)(18).

Type: Violation 2  
Rule: 279.22(d)(3)  
Explanation: The facility failed to respond to and cleanup a release of used oil/oily water in the Outdoor Equipment Laydown Area.  
Corrective Action: No further action is required. The facility returned to compliance via an email on May 1, 2024.

Type: Violation 3  
Rule: 62-710.510(1)(a)  
Explanation: The facility failed to list the EPA ID# for several customers on its 2023 used oil shipping logs.  
Corrective Action: No further action is required. The facility returned to compliance via an email on April 15, 2024.



Type: Violation 4

Rule: 62-710.510(1)(g)

Explanation: The facility failed to document the results of its halogen screening on several 2023 shipping documents.

Corrective Action: In order to return to compliance, the facility should train its employees on documenting the halogen screening results on all shipping records, and provide the training roster to the inspector listed on page 1 of the inspection report.

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### PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7





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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

Cheryl L Mitchell**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**05/24/2024**Date**Tim Jackson**Representative Name**Production Manager**Representative Title**Atlantic Marine Cleaning, 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:**Cheryl L Mitchell**Inspection Approval Date:**05/24/2024