



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

June 18, 2024

Mr. Albert Ocuto
Shop Manager, Alta Equipment Company
539 SW Arrowhead Terrace
Lake City, FL 32024-3374
albert.ocuto@altg.com

Re: Alta Construction Equipment Florida, LLC
EPA/DEP ID: FLR000213686
Columbia County – Hazardous Waste

Dear Mr. Ocuto

Department personnel conducted a compliance inspection of the above-referenced facility on March 21, 2024. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records. Any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your compliance efforts. Should you have any questions or comments, please contact Cheryl Mitchell at (904) 256-1620, or via e-mail at cheryl.l.mitchell@floridadep.gov.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner".

Matthew Kershner
Environmental Manager
Compliance Assurance Program

Enclosure: Inspection Report

cc: DEP Internal: Bonnie Bradshaw, Cheryl L. Mitchell, DEP_NED



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

FACILITY INFORMATION:

Facility Name: Alta Construction Equipment Florida LLC

On-Site Inspection Start Date: 03/21/2024

On-Site Inspection End Date: 03/21/2024

ME ID#: 114928

EPA ID#: FLR000213686

Facility Street Address: 539 SW Arrowhead Ter, Lake City, Florida 32024-3374

Contact Mailing Address: 539 SW Arrowhead Terrace, Lake City, Florida 32024

County Name: Columbia

Contact Phone: (386) 758-7444

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG Used Oil: Used Oil, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility 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: Albert Ocuto, Shop Manager

LATITUDE / LONGITUDE: Lat 30° 7' 19.104" / Long 82° 39' 35.3064"

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

TYPE OF OWNERSHIP: Private

Introduction:

Alta Construction Equipment Florida, LLC (Alta, the facility) was inspected on March 21, 2024. The facility was last inspected by the Department's Hazardous Waste Program on July 21, 2020, when it operated under a former business name as Flagler Construction Equipment. Alta is registered and operating as a Used Oil and Used Oil Filter Transporter and Transfer Facility, a used oil generator, and a Very Small Quantity Generator (VSQG) of hazardous waste. Mr. Albert Ocuto was present throughout the inspection.

Alta is a dealer, rental agent and service agent for trucks, heavy equipment, generators, parts and other equipment. Maintenance work is performed both in the field and at the facility. This Lake City facility is a satellite branch of the Alta Jacksonville facility, and administrative matters are managed either by the Jacksonville facility or Alta corporate headquarters. Alta has operated a business at this location since 2013. Alta has five employees, and operates Monday through Friday, 7:30 AM to 5:00 PM. The facility has its own water well and a septic tank, and consists of one main building that includes a Warehouse, two Maintenance Bays, a Vehicle Wash Bay, and an attached Storage Building.

Process Description:

Mobile Servicing

Alta services heavy equipment and trucks in the field and in the shop. The facility transports only its own used oil generated at its own non-contiguous operations to its own central collection facility for storage prior to having its used oil managed by Safety-Kleen, a certified used oil transporter. 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 three field maintenance trucks that are used to transport used oil,

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in quantities less than 55-gallons, used oil filters and used antifreeze that are generated during its field maintenance activities. The used oil generated in the field is added to the facility's used oil tank located in the Vehicle Wash Bay, described below.

Warehouse and Maintenance Bays

The western end of the main building is used for materials and supply storage (Photo 1). Maintenance on forklifts, vehicles, and various other heavy equipment is performed in one of the two bays adjacent to the Warehouse and located in the central portion of the main building. Used oil, used oil filters, oily rags and oily absorbent are generated in this area. Used oil is drained into drip pans or mobile carts located throughout the area. One drip pan that contained used oil was not properly labeled "Used Oil" (Photo 2) [40 CFR 279.22(c), 62-710.401(6), Florida Administrative Code (FAC)]. Used oil is pumped from the drip pans and mobile carts into a 250-gallon double-walled aboveground storage tank that is located on the other side of the Maintenance Bay wall in the Vehicle Wash Bay, described below. Used oil filters are drained on a rack located in the Maintenance Bay and the used oil is pumped to the storage tank. The filters are accumulated in a Used Oil Filter container located in the Vehicle Wash Bay. Oily absorbents and spill cleanup debris are accumulated in a 55-gallon drum located inside the maintenance area. 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 of by Safety-Kleen on an as-needed basis.

The facility has one Safety-Kleen Premium Solvent parts washer located in the Maintenance Bay. The parts washer is serviced by Safety-Kleen every eight weeks.

Alta uses Volvo and Toro aerosol paints (flashpoint: -2.2°F) 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 used during touch-up or the stenciling process. Alta uses Volvo Non-Chlorinated Brake Cleaner (flashpoint: -4°F), Volvo Multi-Purpose Degreaser (flashpoint: -4°F) or Parts Master Non-Chlorinated Brake & Parts Cleaner (flashpoint: -4°F) on wipes for cleaning. The brake cleaners and degreaser when used on a rag would generate a non-hazardous waste solid. Technicians will sometimes use Kimball Midwest Torq CB Cherry Corrosion Buster (60-70% methylene chloride; flashpoint: DOT flammable aerosol) on a rag. The corrosion buster when used on a rag would generate an F002 hazardous waste solid; however, all shop rags are managed as Excluded Solvent Contaminated Wipes (ESCW), accumulated in 5-gallon containers and laundered weekly by Cintas. There were two containers of ESCW accumulating at the time of the inspection. The containers were closed and properly labeled.

Empty, aerosol cans are placed in the trash. No empty cans were observed in the trash; however, the facility is reminded that even when spent, aerosol cans may contain liquid product and/or flammable propellants which can cause the aerosol can to be a D001 and/or other hazardous waste. Additionally, aerosol cans with broken or clogged nozzles may be considered a hazardous waste. Unless an aerosol can is completely empty of both liquid and propellant, as defined in 40 CFR 261.7, it should not be thrown into the trash. All unusable and spent aerosol cans should either be safely punctured and properly drained into a closed container which should then be managed as hazardous waste, or be placed unpunctured into a closed container which should then be managed as a hazardous waste. Alternatively, the facility may choose to manage hazardous waste aerosol cans as a universal waste, provided they meet the requirements of 40 CFR 273.

Lead-acid batteries are exchanged through Interstate Batteries.

Vehicle Wash Bay

This area is located on the eastern end of the main building, but is separated from the Warehouse and Maintenance Bay areas by a wall. In the Vehicle Wash Bay, pressurized water and Meyer Labs GJ-55 detergent (pH: 13) are used to clean equipment and vehicles after maintenance. Mr. Ocuto said he uses the detergent at a 1:20 dilution. A grated trench drainage system in the floor collects washwater that gravity flows to a 1,000

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underground holding vault that is located on the other side of the wash bay wall inside the attached Storage Building, described below. The 250-gallon double-walled aboveground used oil tank and Used Oil Filter container are also located inside the wash bay. Both containers were closed and properly labeled.

Storage Building

The Storage Building is attached to and located on the outside of the Vehicle Wash Bay. The building houses the pressurized wash system controls that mixes detergent and water prior to being used in the pressurized wash system in the Vehicle Wash Bay. The 1,000-gallon holding vault for the washwater from the wash bay is located in this building. Safety-Kleen pumps-out the washwater every three to six months and manages it as non-hazardous oily wastewater. Alta had full TCLP analysis for this wastestream to support this management.

Vehicle Storage and Staging Yard

This yard is located east of the main building and is used as a laydown area for materials and to stage equipment for sale, lease and/or maintenance (Photo 3). Dumpsters for solid waste and scrap metal are also located in this area. No maintenance is performed in the yard. Scrap metal is recycled by Big Green Ball (aka The Recycling Center).

Records Review

The facility is currently operating as a VSQG of hazardous waste. Records reviewed included manifests, shipping records, annual Used Oil Report, transporter registration and insurance certificates. The transporter registration was posted at the facility. All records reviewed appeared to be in order.

Safety-Kleen (TXR000081205) manages the facility's used oil every three months, used oil filters every six months, used antifreeze as needed, and parts washer waste solvent every eight weeks. The last used oil pickup was March 7, 2024, the last used oil filter pick-up was October 10, 2023, and the last used antifreeze pickup was October 7, 2021. The last parts washer maintenance was performed on December 20, 2023, and the spent solvent appears to have been managed as non-hazardous waste according to the facility's records. Safety-Kleen's records provided subsequent to the inspection indicated that this wastestream is managed as D039 hazardous waste. The facility should ensure that future off-site shipments of this wastestream are managed as hazardous waste, or have the wastestream analyzed for TCLP metals, TCLP VOCs, and flashpoint to support management as a non-hazardous waste.

Because Alta self-transportes its own used oil in quantities less than 55-gallons on its maintenance truck, the facility does not have to transfer its used oil off-site in less than 35 days. However, the facility is reminded that should its operations change in the future such that the amount of used oil transported on its maintenance trucks is greater than 55-gallons, the facility should transfer its used oil off-site within 35 days.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c), 62-710.401(6)
Explanation:	The facility failed to label one used oil container with the words "Used Oil."
Corrective Action:	No further action is required. The facility labeled the container at the time of the inspection.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



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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

05/30/2024
Date

Albert Ocuto
Representative Name

Shop Manager
Representative Title

Alta 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: 05/30/2024