

**From:** [Tim Jackson](#)  
**To:** [Mitchell, Cheryl L](#)  
**Cc:** [CJ Baaklini](#); [DeeAnn Koenig](#)  
**Subject:** Re: MARCH INSPECTION FOLLOW-UP ITEMS - VIOLATION #1, SHOP RAGS  
**Date:** Monday, November 4, 2024 9:36:33 AM  
**Attachments:** [Outlook-AtlanticMa](#)

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Cherly,

AMC no longer uses CRC Non-Flammable products. We have asked Perma-fix for assistance in disposing of (2) 19-ounce cans of Lectra-Motive Electric Parts cleaner, (1) 19-ounce can of Brakleen Brake Parts cleaner and (1) 32-ounce can of Oatey Purple Primer. Moving forward, AMC will look closely at the SDS before purchasing new products. I will update you as soon as we receive the waste manifest from Vince at Perma-fix.

**We have moved, please note our new address**

**1299 W Beaver St**

**Jacksonville, FL 32204**

V/R,

Timothy Jackson

O: 904-350-0006

M: 904-609-8139

Program Manager



P.O. Box 40745, Jax, FL 32203-0745

1299 W. Beaver St, Jax, FL 32204

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**From:** Mitchell, Cheryl L <[Cheryl.L.Mitchell@FloridaDEP.gov](mailto:Cheryl.L.Mitchell@FloridaDEP.gov)>

**Sent:** Wednesday, October 23, 2024 4:18 PM

**To:** Tim Jackson <[tim@marinecleaning.com](mailto:tim@marinecleaning.com)>

**Cc:** CJ Baaklini <[cbaaklini@marinecleaning.com](mailto:cbaaklini@marinecleaning.com)>; DeeAnn Koenig <[dee@marinecleaning.com](mailto:dee@marinecleaning.com)>

**Subject:** MARCH INSPECTION FOLLOW-UP ITEMS - VIOLATION #1, SHOP RAGS

Hey Tim – back in March you sent me the SDSs I requested for the various products that I saw in your flam lockers. However, as described in the attached Inspection Report and in Violation # 1 (excerpts below) issued in May, due to some of the solvent ingredients in several of those products, if any were used with wipes, your wipes would have to be sampled to rule out them being haz waste, or be managed as Excluded Solvent-Contaminated Wipes (ESCW). I recall that you said you would just review all the products in inventory, remove any with solvents, and continue to manage your wipes as non-haz solids. I would caution that SDSs for any future purchases need to be closely cross-checked with the attached list of F-List solvents. If any of the F-solvents are ingredients in products that could be used with wipes, or collected in another manner, the wipes cannot be disposed as non-haz waste.

Please respond to this email and let me know what actions you took after receipt of the inspection report and how you are managing your shop rags. I need a response within the next 2 weeks, please.

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].

Type:	Violation 1
Rule:	262.11
Explanation:	The facility failed to make an accurate hazardous waste determination on its disposable shop rags.
Corrective Action:	<p>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:</p> <ul style="list-style-type: none"> <li>- Toxicity Characteristic Leaching Procedure (TCLP) for volatiles, pursuant to 40 CFR 261.24, via method 8260.</li> </ul> <p>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).</p>

r/

Cheryl

904-256-1620