



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

---

**FACILITY INFORMATION:**

**Facility Name:** Freehold Cartage Inc

**On-Site Inspection Start Date:** 11/25/2024

**On-Site Inspection End Date:** 11/25/2024

**ME ID#:** 16638

**EPA ID#:** FLD984187831

**Facility Street Address:** 520 Beechcraft St, Bartow, Florida 33830-6639

**Contact Mailing Address:** 520 Beechcraft St, Bartow, Florida 33830-6639

**County Name:** Polk

**Contact Phone:** (732) 462-1001

**NOTIFIED AS:**

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

**WASTE ACTIVITIES:**

**Generator:** SQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Mercury containing devices (LQH) - 100kg or more accumulated, Mercury containing lamps (LQH) - 2000kg or more accumulated

**INSPECTION TYPE:**

Routine Inspection for SQG (100-1000 kg/month) Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Betsy Loaiza, Inspector

Other Participants: Warren McNelley, Government Operations Consultant III, Brandon Miller, Environmental Manager, Michael Hirst, Terminal Manager

**LATITUDE / LONGITUDE:** Lat 27° 57' 15.1615" / Long 81° 46' 37.6731"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Freehold Cartage, Inc. (Freehold), was inspected on November 25, 2024, by the Florida Department of Environmental Protection (Department) to determine the facility's compliance with state and federal hazardous waste regulations governing Small Quantity Generators (SQGs) of hazardous waste. The facility initially notified as a transporter of hazardous waste on May 23, 1989, and subsequent SQG of hazardous waste on September 16, 2009. The facility most recently notified as an SQG of hazardous waste on March 11, 2024. The Department has conducted numerous hazardous waste inspections of this facility, the most recent inspection was conducted on June 4, 2021, and the Polk County SQG program last inspected the facility on August 4, 2010. Department inspectors were assisted by Terminal Manager, Michael Hirst, for the duration of the inspection.

**PERMITS/REGISTRATIONS**

- Transporter of Universal Waste Lamps and Devices, Transfer facility for Universal Waste Lamps and Universal Waste Devices, and a Large Quantity Handler Facility for Universal Waste Lamps and Devices; the current registration expires on March 1, 2025.
- Used Oil/Used Oil Filter Transporter and Used Oil/Used Oil Filter Transfer Facility; the current registration expires on June 30, 2025.
- Hazardous Waste Transporter; the current certification expires on June 30, 2025.
- Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity through the Department: Permit No. FLR05A713-005, which was effective on April 15, 2024, and expires on April 14, 2028.

Inspection Date: 11/25/2024

**Process Description:**

Freehold is a registered hazardous waste, used oil, used oil filter, and universal waste transporter and transfer facility. The main source of hazardous waste generation at Freehold would stem from accidentally damaged drums or totes during loading or unloading processes onsite. The facility operates within two contiguous properties with an office building and loading dock on the western property, and a large parking lot for storage of empty trailers on the eastern property. Currently, there are approximately 37 employees on staff, and 32 of the employees are drivers. Freehold operates Monday through Friday, from 8:00 a.m. to 5:00 p.m., and at times may operate on Saturdays depending on demand. The facility is no longer on septic and is now connected to the City of Bartow water and sewer. Fluorescent lighting is used within the office building, while LED lighting is used outside on the dock.

**FACILITY SAFETY**

Freehold is equipped with a security system, fire alarm, and fire extinguishers that are maintained annually. Additional safety equipment was observed onsite, including eye wash stations and spill kits.

**FACILITY EQUIPMENT**

Freehold operates machinery including a forklift, a backhoe, and a yard dog. Machinery is serviced by a third-party, who is responsible for managing any waste generated.

**OFFICE BUILDING**

The Office Building is located along the north edge of the western property. No hazardous waste was observed in this area.

**WASTE ACCEPTANCE AND MANAGEMENT**

Freehold seldom transports used oil and no longer operates waste tankers out of this location. Freehold screens all drums of used oil with Dexsil Clor-D-Tect testing kits prior to pick-up. If the used oil fails the halogen test, Freehold has the option to either reject the drum or request a hazardous waste manifest. No consolidation or mixing of hazardous waste and used oil is conducted on-site. Hazardous waste containers are stored up to 10 days within storage trailers. Freehold keeps track of how long hazardous waste containers are on site through Excel Spreadsheets. This tracking system indicates the generator, manifest tracking number, day received, day that the waste must be transported, and the actual date of transportation.

**LOADING DOCK**

The Loading Dock is located atop a paved and curbed containment pad to the southeast of the Office Building. The containment pad is graded towards the dock on either side and has a sump. Any liquids in the sump are tested and pumped out periodically. If a spill were to occur, the facility would take proper measures to ensure the sumps are cleaned out and any liquids were managed properly. The dock area is equipped with an eyewash station and fire extinguishers.

Freehold maintains approximately 35 trucks and the Loading Dock has 16 bays, 8 on either side. The facility operates to ensure all bays are docked with a trailer, whether the trailer is ready to be loaded or unloaded. Trailers can either be pre-loaded and awaiting a driver for its next destination or manually loaded by the facility by destination. Docked empty trailers are loaded with waste containers as they arrive to the facility. The waste containers are distributed to each docked trailer based on like wastes and similar treatment, storage, and destination facilities. Each trailer is equipped with its own spill kit for transit.

**PARKING LOT**

The Parking Lot extends through both properties and is primarily utilized to house empty trailers. During the inspection, Department personnel verified that trailers parked in this area were empty. Several roll-off containers throughout the parking lot were also observed and confirmed to be empty. The facility has previously transported hazardous waste in roll-offs; however, roll-offs are rarely used anymore.

Inspection Date: 11/25/2024

## RECORDS REVIEW

At the time of the inspection, Freehold was notified as an SQG of hazardous waste, a hazardous waste transporter, a transporter/transfer facility of universal waste lamps and devices, and a used oil/used oil filter transporter/transfer facility; therefore, Freehold was inspected as such. Prior to the inspection, a records review was conducted on all annual reports submitted to the Department.

- Hazardous Waste: Within the past three years, Freehold has not generated hazardous waste onsite to dispose of.
- Rejected Loads: Rejected loads for the past three years were reviewed following the inspection and appeared to be complete. The most recent partial rejected load was on November 27, 2024, manifest tracking number 026665491JJK, and was returned back to the facility.
- Used Oil Logs: Used oil records were reviewed onsite and appeared to be complete. The most recent used oil shipment was conducted on August 23, 2024, for 165 gallons. This shipment appeared to be the only used oil shipment for the year. Records appeared to show that used oil was not stored onsite for more than the allowable time limit.
- Transfer Logs/Manifests: Transfer logs are kept on Excel Spreadsheets that display the date the shipment was accepted and the date that the shipment must be transferred by, in order to comply with the 10-day storage limit. Pending/outgoing manifests were reviewed onsite and appeared to be complete.
- Contingency Plan: The Contingency Plan was available for review at the time of the inspection and appeared to be complete and up to date.
- Copies of the Contingency Plan were distributed to the required local authorities, and documentation of this was available for review during the inspection.
- Employee Training Records: Annual employee training records were available for review during the inspection and appeared to be current and complete. The most recent training occurred on April 20, 2024.
- Proof of Liability Insurance: Records of the facility's Hazardous Waste Transporter and Used Oil Handler Certification of Liability Insurance forms were available for review and appeared complete.
- Annual Report for Universal Waste Lamps and Devices: The annual report was submitted to the Department along with the facility's renewal on February 16, 2024.
- Annual Report for Used Oil and Used Oil Filter Activities: The annual report was submitted to the Department along with the facility's renewal on February 16, 2024.
- Fleet: All trucks onsite had DOT placards displayed on them. All fleet vehicle maintenance is provided by a third-party contractor off site.

## FACILITY STATUS

Based on the inspection and review of hazardous waste disposal records, it appears that the facility is notified as an SQG for preventative measures. No hazardous waste was observed being generated at the time of the inspection.

## PHOTO ATTACHMENTS:

Overview of Dock



Curbed and Paved Containment for Dock



Eyewash Station on Dock



Overview of Docked Trailer



Overview of Parking Lot



Empty Roll-offs



---

**Conclusion:**

At the time of the inspection, Freehold Cartage, Inc. was operating in compliance with state and federal regulations governing Small Quantity Generators of hazardous waste.

Inspection Date: 11/25/2024

**3.0: Small Quantity Generator 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.	40 CFR 262 Subpart A -- General Standards	Yes	No	N/A
3.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
3.2	Has the facility obtained an EPA ID number? 262.18(a)	✓		
3.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.18(c)	✓		
3.4	Are any hazardous wastes treated or disposed of on site?			
3.5	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)			✓
Item No.	Land Disposal Restrictions	Yes	No	N/A
3.6	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)			✓
3.7	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5)			✓
3.8	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
3.9	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
3.10	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
3.11	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
3.12	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
3.13	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)	✓		
3.14	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)			✓
3.15	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)			✓
3.16	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
3.17	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓

Inspection Date: 11/25/2024

3.18	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
3.19	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)			✓
3.20	Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9)			
3.21	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
3.22	Is the generator a small quantity generator (SQG) using a tolling agreement pursuant to 40 CFR 262.20(e)?			
3.23	Did the SQG comply with the applicable notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10)			✓
3.24	Has the SQG retained on-site a copy of the notification and certification, along with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10)			✓
Item No.	The Manifest	Yes	No	N/A
3.25	<p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are NOT in compliance) 262.20(a)(1)</p> <p><input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number</p> <p><input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p><input type="checkbox"/> Item 3. Emergency Response Phone Number (must meet requirements below)</p> <p><input type="checkbox"/> Item 4. Manifest Tracking Number</p> <p><input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p><input type="checkbox"/> Item 6. Transporter 1 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 7. Transporter 2 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</p> <p><input type="checkbox"/> Item 10. Containers (Number and Type)</p> <p><input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p><input type="checkbox"/> Item 12. Units of Measure (Weight/Volume)</p> <p><input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p><input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information</p> <p><input type="checkbox"/> Item 15. Generator's / Offeror's Certifications</p> <p><input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted)</p> <p><input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p><input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p><input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes</p> <p><input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p>			✓



Inspection Date: 11/25/2024

3.26	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)			✓
3.27	Did the generator sign the manifest certification by hand? 262.23(a)(1)			✓
3.28	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)			✓
3.29	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)			✓
3.30	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c)			✓
3.31	For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d) <input type="checkbox"/> The next non-rail transporter? <input type="checkbox"/> The Designated Facility if transported solely by rail? <input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail?			✓
3.32	If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b)			✓
3.33	Did the generator maintain manifests for 3 years? 262.40(a)			✓
3.34	Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility?			
3.35	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	Pre Transport Requirements	Yes	No	N/A
3.36	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
3.37	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓
3.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
3.39	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are NOT in compliance) 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?			✓
3.40	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	Accumulation Requirements	Yes	No	N/A
3.41	Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16			✓
3.42	Check the applicable accumulation unit if the facility accumulates hazardous waste on-site prior to treatment or disposal <input type="checkbox"/> Containers - Complete Container Checklist below <input type="checkbox"/> Tanks - Complete Tanks Checklist below			
3.43	Does the facility comply with the 180-day accumulation time limit? 262.16(b)			✓

Inspection Date: 11/25/2024

3.44	If NO, has the facility been issued an extension by the Department? 262.16(d)			✓
3.45	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.16(b)(1)			✓
3.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.16(b)(6)(i)(C)			✓
3.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.16(b)(6)(i)(A)			✓
3.48	Are Satellite Accumulation points used? (If No, mark all items below as N/A.)			
3.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a)			✓
3.50	Are satellite containers under the control of the operator of the process generating the waste? 262.15(a)			✓
3.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.15(a)(1)			✓
3.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.15(a)(2)			✓
3.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.15(a)(4)			✓
3.54	Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5)			✓
3.55	Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point?			
3.56	If YES, after 3 days did the generator mark or label an accumulation start date on the excess waste containers ? 262.15(a)(6)			✓
Item No.	Emergency Information/Personnel Training	Yes	No	N/A
3.58	Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i)	✓		
3.59	Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii) <input type="checkbox"/> Name and telephone number of the Emergency Coordinator <input type="checkbox"/> Location of fire extinguishers and spill control material, and, if present, fire alarm <input type="checkbox"/> Telephone number of the fire department, unless the facility has a direct alarm (911 is acceptable)	✓		
3.60	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii)	✓		
3.61	Has the facility had to respond to any emergencies in the past 3 years?			
3.62	If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.16(b)(9)(iv) <input type="checkbox"/> FIRE - Call fire department or attempt to extinguish with a fire extinguisher <input type="checkbox"/> SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil <input type="checkbox"/> FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch Office and National Response Center and report			✓
Item No.	Use and Management of Containers	Yes	No	N/A
3.63	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.16(b)(2)(i)			✓



Inspection Date: 11/25/2024

3.64	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.16(b)(2)(ii)			✓
3.65	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.16(b)(2)(iii)(A)			✓
3.66	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.16(b)(2)(iii)(B)			✓
3.67	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.16(b)(2)(iv)			✓
3.68	Does the generator properly document the weekly inspections? This should include at a minimum:(Check items below that are NOT in compliance) 62-730.160(3) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input type="checkbox"/> Date and nature of any repairs or remedial actions			✓
3.69	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 262.16(b)(2)(v)(A)? 262.16(b)(2)(v)(A)			✓
3.70	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B)			✓
3.71	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C)			✓
Item No.	Tanks Requirements for SQGs	Yes	No	N/A
3.72	Does the facility treat or store hazardous waste in tanks?			
3.73	If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A)			✓
3.74	Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B)			✓
3.75	Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C)			✓
3.76	If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D)			✓
3.77	Does the facility inspect, where present, the following at least once each operating day:			
3.78	Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A)			✓
3.79	Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B)			✓
3.80	The level of waste in the tank? 262.16(b)(3)(iii)(C)			✓
3.81	Does the facility inspect the following at least weekly:			

Inspection Date: 11/25/2024

3.82	The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 262.16(b)(3)(iii)(D)			✓
3.83	The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 262.16(b)(3)(iii)(E)			✓
3.84	Does the facility accumulate waste in tanks or tank systems that have full secondary containment and either leak detection equipment to alert facility personnel to leaks or established workplace practices to ensure leaks are promptly identified?			
3.85	If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 262.16(b)(3)(iv)			✓
3.86	Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 262.16(b)(3)(iv)			✓
3.87	Does the documentation include a description of the established workplace practices at the facility? 262.16(b)(3)(iv)			✓
3.88	Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 262.16(b)(3)(vi)			✓
3.89	Does the facility manage ignitable or reactive waste in tanks?			
3.90	If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 262.16(b)(3)(vii)(A) <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies?			✓
3.91	If the facility treats or stores ignitable or reactive waste in a covered tank does the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 262.16(b)(3)(vii)(B)			✓
3.92	If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(1)			✓
3.93	If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(2)			✓
Item No.	Preparedness and Prevention	Yes	No	N/A
3.94	Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 262.16(b)(8)(i)	✓		
3.95	Does the facility have an internal communication or alarm system? 262.16(b)(8)(ii)(A)	✓		
3.96	Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.16(b)(8)(ii)(B)	✓		

Inspection Date: 11/25/2024

3.97	Is the fire control equipment adequate? 262.16(b)(8)(ii)(C)	✓		
3.98	Is spill control and decontamination equipment present? 262.16(b)(8)(ii)(C)	✓		
3.99	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 262.16(b)(8)(ii)(D)	✓		
3.100	Is the emergency equipment inspected and tested periodically? 262.16(b)(8)(iii) If yes, how many times per year? 262.16(b)(8)(v)	✓		
3.101	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 262.16(b)(8)(v)	✓		
3.102	Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A) <input type="checkbox"/> Fire Department <input type="checkbox"/> Police <input type="checkbox"/> Hospital <input type="checkbox"/> Emergency Response Contractor	✓		
3.103	If NO has the facility attempted to do so and is the refusal documented? 262.16(b)(8)(vi)(B)			✓
Item No.	Record keeping and Reporting	Yes	No	N/A
3.104	Is the generator keeping records of exception reports? 262.42(b)			✓
3.105	Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.11(f)			✓
3.106	Are the records kept on-site? 262.40	✓		
3.107	Are records kept for a minimum of 3 years? 262.40	✓		
3.108	Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.)			
3.109	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.83(b)			✓
3.110	Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.)			
3.111	If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83			✓

Inspection Date: 11/25/2024

**6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A

Inspection Date: 11/25/2024

6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a reclamation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)	✓		
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)	✓		
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)	✓		


Inspection Date: 11/25/2024

6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31	✓		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

Inspection Date: 11/25/2024

**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

<u>Betsy Loaiza</u> <b>Principal Investigator Name</b>	<u>Inspector</u> <b>Principal Investigator Title</b>	
 <b>Principal Investigator Signature</b>	<u>DEP</u> <b>Organization</b>	<u>12/16/2024</u> <b>Date</b>
<u>Warren McNelley</u> <b>Inspector Name</b>	<u>Government Operations Consultant III</u> <b>Inspector Title</b>	
	<u>DEP</u> <b>Organization</b>	
<u>Brandon Miller</u> <b>Inspector Name</b>	<u>Environmental Manager</u> <b>Inspector Title</b>	
	<u>DEP</u> <b>Organization</b>	
<u>Michael Hirst</u> <b>Representative Name</b>	<u>Terminal Manager</u> <b>Representative Title</b>	
	<u>Freehold Cartage, Inc.</u> <b>Organization</b>	

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:** Michael Miller **Inspection Approval Date:** 12/19/2024