



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Alexis A. Lambert
Secretary

January 28, 2025

Mr. Ryan Prewitt
Transflo Terminal Services, Inc.
500 Water Street #J-975
Jacksonville, FL 32202
Sent electronically to: rprewitt@transflo.net

Re: Jacksonville Transflo Terminal
EPA/DEP ID: FLD984253526
Duval County – Hazardous Waste

Dear Mr. Prewitt:

Department personnel conducted a compliance inspection of the above-referenced facility on November 14, 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.

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: Mr. Sean Bessette, Precision Terminal Logistics (sbessette@precisiontl.com)
FDEP: Bonnie Bradshaw



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

FACILITY INFORMATION:

Facility Name: Jacksonville Transflo Terminal

On-Site Inspection Start Date: 11/14/2024

On-Site Inspection End Date: 11/14/2024

ME ID#: 21835

EPA ID#: FLD984253526

Facility Street Address: 3796 Warrington St, Jacksonville, Florida 32254

Contact Mailing Address: 500 Water St #J975, Jacksonville, Florida 32202-4423

County Name: Duval

Contact Phone: (904) 259-2279

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Used Oil, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Hazardous Waste Transporter Facility

Routine Inspection for Hazardous Waste Transfer Facility

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

Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Sean Bessette, Terminal Manager

LATITUDE / LONGITUDE: Lat 30° 19' 34.8335" / Long 81° 43' 10.1917"

NAIC: 488210 - Support Activities for Rail Transportation

TYPE OF OWNERSHIP: Private

Introduction:

Jacksonville Transflo Terminal (Transflo, the facility) was inspected on November 14, 2024. The facility was previously inspected by the Department's Hazardous Waste Program on February 10, 2022. The facility is currently registered with the Department as a Hazardous Waste Transporter and Transfer Facility, a Used Oil Transporter and Transfer Facility, and a Very Small Quantity Generator (VSQG) of hazardous waste. The facility is currently operating as a Used Oil Transfer Facility and Non-Handler (NHR) of hazardous waste, but prefers to maintain a current registration as a Hazardous Waste Transporter and Transfer Facility, and as a VSQG in the event that operations change in the future.

Transflo operates as a rail-to-truck or truck-to-rail transfer point for various product materials including hydrogen peroxide, dry commodities, and tall oil; and operates as a truck-to-rail transfer of used oil. The facility operates 6 a.m. to 6 p.m. on Monday through Friday and has been in operation at this location, under various names, for more than 30 years. CSX Transportation owns the property and Transflo leases the property. Day-to-day terminal operations and equipment maintenance operations are managed via contracted services. The current contractor is Precision Terminal Logistics who has 10 employees working at the facility.

Transflo is a subsidiary of CSX Transportation (FLD006921340); however, the two entities operate independently of one another. CSX operates the locomotives that move the used oil rail cars and the product rail cars that are loaded or offloaded at Transflo. Rail cars are independently owned or leased by individual shipping companies that use the terminal for transfer operations.

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The facility is connected to city water and has a septic tank. Mr. Sean Bessette, Precision Terminal Logistics, Terminal Manager, and Luke S. Lewis (FDEP) were present throughout the inspection. The facility is approximately nine acres in size and consists of a small building with office spaces, the Rail Yard, and a Maintenance Shop Area. The areas inspected are described below.

Process Description:**RAIL YARD**

The facility has five loading tracks, Tracks 1 – 5. Used oil is only received for truck-to-rail transfers into one or two cars that are staged on Track 1 (Photo 1). This track is also used for rail transfers of raw products. Track 2 is used to receive product peroxide liquids, Track 3 is used to receive other products including tall oil, and Track 4 is used to receive dry bulk products. Products typically arrive by rail and are transferred to trucks for distribution. Transflo currently accepts used oil only from Heritage Crystal Clean (HCC, FLR000154278). HCC transports used oil in trucks to the rail yard where it is transferred into rail cars by Transflo contractor personnel. Used oil rail cars have a capacity of approximately 28,000 gallons, and they are loaded with used oil over numerous trips. To ensure the rail cars do not remain on-site longer than 35-days, Transflo notifies HCC when the rail car either approaches capacity or when day 35 is approaching. HCC is responsible for coordinating off-site shipment via CSX who arranges for the movement of the rail cars. The facility maintains a logbook on-site that documents the rail car number, the date of the first off-load into the rail car, the total amount off-loaded, the anticipated date of removal, and the actual date of removal. There were two used oil rail cars accumulating on Track 1 at the time of the inspection (Photo 2).

Secondary containment drip pans are provided beneath the rail cars to catch drips and/or spills that may occur during loading, and spill kits are staged in between Tracks 1 and 2.

MAINTENANCE SHOP AREA

This area is located inside a small building located in the center of the property in between Tracks 3 and 4. The building is also used for storage of equipment and materials. Mr. Bessette stated that minor maintenance is only performed on the facility's tractors in this area. Maintenance on the facility's pumpers and conveyors is performed by outside contractors who manage any waste generated during those activities. At the time of the inspection, one 55-gallon drum of used oil was accumulating, and one 55-gallon drum of used oil filters were accumulating. The drums were closed, properly labeled, and located within secondary containment. No hazardous waste is generated in this area. Oily shop rags are collected in a 5-gallon step can and laundered weekly through Unifirst with the most recent service occurring in January 2025. The facility is reminded that if it uses aerosol spray cleaners on the shop rags, it should ensure that the cleaners do not contain solvents that could make the waste rags hazardous waste (i.e., toluene, methyl ethyl ketone, tetrachloroethylene, etc.). If cleaners with these types of solvent constituents are used, the facility should manage its rags as hazardous waste, or as Excluded Solvent Contaminated Wipes (ESCW) in accordance with 40 CFR 261.4(a)(26) if the rags are launderable, or as ESCW in accordance with 40 CFR 261.4(b)(18) if the rags are not launderable.

The facility infrequently uses paint for minor touch-up of the equipment and facility, and to apply traffic markings in the rail yard. No empty aerosol cans were observed in the locker or in the trash at the time of the inspection. Mr. Bessette stated that any unusable paint and aerosol cans would be properly disposed as hazardous waste at the county's household hazardous waste collection center. The facility could also manage its waste aerosol cans as a universal waste in accordance with 40 CFR 273.

RECORDS REVIEW

At the time of the inspection Transflo was operating as a Used Oil Transfer Facility and Non-Handler (NHR) of hazardous waste. Records reviewed included the previous three years of rail car delivery/shipping logs, personnel training records, Used Oil Transporter/Transfer Facility registration and insurance certificates, and

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disposal records for used oil/oil filters generated on-site. Based on the facility's records, no rail cars had accumulated used oil on-site for greater than 35 days. The most recent shipment of used oil generated by the facility was managed on November 13, 2023, by Clean Harbors Environmental Services (MAD039322250). Used oil filters had not been disposed within the previous three years. All records reviewed appeared to be in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



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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

<u>DEP</u>	<u>01/28/2025</u>
Organization	Date

Sean Bessette
Representative Name

Terminal Manager
Representative Title

Precision Terminal Logistics
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: 01/28/2025