



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: COMPLAINT ☒ ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME: North Florida Oil, Inc. DEP/EPA ID# FLD101828689
STREET ADDRESS: 24133 State Road 40, Astor, Florida 32102
MAILING ADDRESS: Post Office Box 157, Astor, Florida 32102
COUNTY: Lake PHONE: (352) 759-2895 DATE: 6/9/98

NOTIFIED AS:

- ☒ Non-Handler
☐ CESQG (100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (1000 kg/mo.)
☐ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☒ Used Oil: **Transporter, Transfer Facility,
Marketer, Burner, Processor**
☒ Used Oil Filter: **Transporter, Transfer
Facility, Processor**

CURRENT STATUS:

- ☐ Non-Notifier
☐ Non-Handler
☒ CESQG (100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (1000 kg/mo.)
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2. Applicable Regulations:
☒ 40 CFR 261.5 ☐ 40 CFR 262 ☐ 40 CFR 263 ☐ 40 CFR 264
☒ 40 CFR 265 ☐ 40 CFR 266 ☐ 40 CFR 268 ☒ 40 CFR 279
3. Responsible Officials:
Brenda Simmons, Owner
4. Survey Participants and Principal Inspector:
Brenda Simmons, NFO Owner
Robert Simmons, NFO Operations Manager
Darlyne English, NFO Office Manager
Lu Burson, FDEP
Jennifer Hobbs, FDEP
5. Facility Location: Latitude: 29:09:22 Longitude: 81:34:30
6. SIC Code: 5172 - Petroleum Products, nec
7. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE
8. Permit No.: HO06-0027221 (Used Oil) Date Issued: May 26, 1998 Exp. Date: May 26, 2003

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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9. Introduction:

On June 9, 1998, Lu Burson, and Jennifer Hobbs, Florida Department of Environmental Protection (FDEP), accompanied by Brenda Simmons, North Florida Oil (NFO), Robert Simmons, NFO, and Darlyne English, NFO, inspected the facility for compliance with state and federal hazardous waste and used oil regulations.

NFO is a registered used oil and used oil filter transporter, transfer facility, and processor, and a registered marketer of on-specification used oil located at 24133 State Road (SR) 40, Astor, Lake County, Florida. The facility is on city water, septic system, and has operated at this location since 1980.

10. Inspection History:

This is the first compliance inspection at NFO since the facility was issued a used oil processor operating permit. Previous compliance inspections were conducted on November 2, 1995, and January 18, 1996. NFO operated under a state issued general permit at that time.

11. Narrative:

I. INSPECTION:

NFO is a registered used oil and used oil filter transporter, transfer facility, and processor. They have a current used oil processor permit and are a marketer of on-specification used oil. Transportation operations are conducted throughout northern and central Florida. All used oil and used oil filters are brought back to their facility in Astor for processing.

NFO has five on the road trucks, two of which are compartmentalized. In addition to the on the road trucks, NFO also has two semi-trucks used for processed on-specification used oil and industrial wastewater delivery. At the time of inspection, one of the semi trucks had burned as a result of mechanical failure, leaving only one semi available for use.

Used oil is screened for water and halogens prior to collection. Drivers use a halogen sniffer to screen loads before acceptance. If a possible hot load is detected the driver will call in for instructions. Normally, questionable results are verified with a *Dexil Chlor-D-Tect* halogen test before acceptance and the customer is charged a fee. *Screening test results are not recorded on the acceptance manifest or truck logs.*

When the truck returns to the facility a composite sample is pulled before the oil is off loaded for storage. The composite sample is tested for halogens and a distillation for water content is performed at the facility's on site laboratory. All results are recorded on an incoming tank data log which documents the storage tank number for off loading. The lab also performs a viscosity and API gravity test which is recorded on the tank data log. If the composite sample tests high for halogens, each compartment will be sampled individually. Should any compartment test high it will be segregated until further analysis can be completed. A 250 gallon tank is located on site for use

as temporary storage in the event that used oil received is suspected of containing greater than 1000 ppm halogens.

The used oil is off loaded into one of two holding tanks depending on the water content. Tanks T1, and T2 are 10,000 gallon aboveground storage tanks used as drop tanks to hold used oil before processing. T3 is an 8,000 gallon drop tank used to store wastewater and antifreeze. At the time of inspection, T1 and T2 were labeled "Used Oil" and T3 was labeled "Industrial Wastewater". It was stated that T3 may be used to store used oil when capacity warrants. If the used oil contains less than five percent water, and does not exceed halogen limits, it can be filtered and shipped direct without further processing. If the used oil contains greater than five percent water, further processing is necessary.

Used oil containing greater than five percent water is off loaded into the appropriate tank for processing. Tank T8 is a 15,000 gallon used oil processing tank where demulsifying chemicals are added and heat is applied to physically remove water from the used oil. The used oil is also run through a filter box to remove additional contaminants. In addition to the filter box, used oil is filtered as it is both on and off loaded from each individual truck.

Also located in the facility's tank farm: Tank T4 - 15,000 gallon temporary additional storage, T5 - 38,000 gallon treated bulk storage tank, and T6 - 28,000 gallon treated bulk storage tank. Tank T7 has been removed from the tank farm and is currently not in use. The tank farm is located inside a concrete block secondary containment area. Repairs had recently been completed to a leak in the northeast corner containment wall. The containment area was clean and dry at the time of inspection. *Note: Facility Used Oil Processor Permit, Section II. Operating Requirements, Item 5 states that the permittee shall submit a report by no later than July 30, 1998 to the Department showing compliance with the structural integrity requirements as outlined in 62-762.* A list of state licensed contractors providing tank and containment integrity testing was mailed under separate cover on June 15, 1998. Lake County was at the facility on May 28, 1998 to inspect and verify registration of all tanks on site.

After processing, the used oil is analyzed for on-specification verification. A sample is collected and sent to a lab in Texas for analysis. Any oil not meeting requirements can be re-processed if necessary. Once on-specification requirements are met, the used oil is sold to either McAsphalt, Central Florida Hot Mix, or Suncoast Paving for use as used oil fuel. Incoming acceptance manifests are matched with each outgoing manifest.

Full used oil filter drums are exchanged for empties and filter drums are brought back to the Astor facility. NFO picks up approximately 12 to 15 drums of used oil filters daily which are crushed and bulked into a covered roll off container. A full roll off of crushed filters is delivered directly to U.S. Foundry in Miami once or twice per month. At the time of the inspection there were approximately 180 drums of filters waiting for processing because the filter crusher was not operational. The drums were staged outside the concrete building where the crusher is located. Some appeared to be staged directly on the ground. Pursuant to 62-710.850(6)(a), Containers used to store used oil

filters shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

Sludges removed from the filter crushing machine, as well as any generated from tank cleaning, are tested for hazardous constituents by Perma-fix. To date, no tests have come back hazardous. Non-hazardous sludges are disposed of through Ogden Martin, the waste to energy incinerator located in Lake County.

Antifreeze is accepted only if it has supporting analytical results documenting that it is non-hazardous. Every attempt is made to pick up antifreeze only in one of the compartmentalized tankers. If a non-compartmentalized truck is used, it is the driver's last stop of the day. Antifreeze is off loaded into the Industrial Wastewater tank and is co-mingled with other oily wastewaters collected from oil water separators, etc. Oily water is collected as non hazardous by generator knowledge or analytical testing, where appropriate. An oil water separator is located on site to remove as much oil as possible prior to shipment to IPS in Jacksonville.

Small amounts of hazardous wastes are generated from cleaning equipment and floors, and waste generated from parts washing. Suspected hazardous wastes are tested and managed through Florida Environmental Compliance Corporation and disposed of appropriately. Occasionally NFO may receive other oily wastes such as absorbents and paper or plastic filters. These oily wastes are bulked and shipped to Ogden Martin in accordance with 40 CFR 279.10(c)(2).

II. WASTE MANAGEMENT PRACTICES:

The facility generates very little waste from on site operations. Those generated on site are outlined in the above inspection narrative. In 1992, NFO notified the Department as a non-handler of hazardous waste. The facility needs to update their notification to indicate Conditionally Exempt Small Quantity Generator status. A notification booklet was provided under separate cover on July 6, 1998.

III. RECORD REVIEW:

Records reviewed included employee training records, random analytical results, incoming load data logs, semi-load outgoing logs, and selected manifests for both incoming and outgoing shipments. Incoming manifests were cross referenced to outgoing loads. Individual generator EPA identification numbers were not noted each NFO acceptance manifest. The EPA identification number, where applicable, of the used oil generator who provided the used oil for transport must be recorded on the manifest for each shipment. [40 CFR 279.46(a)(2)] *Halogen screening results were not noted on any of the manifests reviewed. NFO should ensure that all drivers are aware that the screening results need to be recorded on each individual manifest. In addition, 62-710.510(2) F.A.C. advises transporters to maintain documentation of any shipment of used oil which is refused due to suspected mixing with hazardous waste and to provide this information to the Department.*

12. Conclusion:

NFO was inspected as a Conditionally Exempt Small Quantity Generator of hazardous waste, used oil and used oil filter transporter and transfer facility, used oil processor, and marketer of on-specification used oil. The following section outlines the non compliance items noted and their corresponding corrective actions.

13. Summary of Non-Compliance Items and Recommended Corrective Actions:

a.) Violation: 40 CFR 279.46(a)(2) - Recording EPA identification numbers

The EPA identification number, where applicable, of the used oil generator who provided the used oil for transport must be recorded on the manifest for each shipment. Specifically, NFO failed to record generator EPA identification numbers on manifests.

Corrective Action:

NFO must immediately record generator EPA identification numbers, where applicable, on each manifest. A reasonable attempt should be made to obtain the identification number for each facility. If the facility is known to be a conditionally exempt small quantity generator of hazardous waste and does not currently have an EPA identification number, this should be noted on the manifest in lieu of a number. The Department has provided NFO, under separate cover on July 2, 1998, with a list of EPA identification numbers that have been assigned to various addresses in the counties where they provide service. The Department will continue to work with NFO to obtain any EPA identification numbers in question.

b.) Violation: 62-710. 850(6)(a) - Used Oil Filter Storage

"Containers used to store used oil filters shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface." Specifically, NFO had 55 gallon drums of used oil filters stored on ground surfaces.

Corrective Action:

NFO must immediately store all used oil filter drums on an oil-impermeable surface, protected from weather. **Within 15 days of receipt of this Inspection Report**, provide the Department with written assurance that all drums of used oil filters are closed, protected from the weather, and stored on an oil-impermeable surface. Include documentation of how excess used oil filter drums will be handled in the future.

Report Prepared By:


Lu Burson, Environmental Specialist II

RTS/lbq
cc: EPA Region 4
FDEP, Tallahassee