



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 20, 2013

Mr. Greg Reynolds, Vice President and General Manager
Water Recovery, LLC
1819 Albert Street
Jacksonville, Florida 32202
greynolds@wrijax.com

Re: Water Recovery, LLC
EPA/DEP ID: FLR 000 069 062
Duval County – Hazardous Waste

Dear Mr. Reynolds:

Florida Department of Environmental Protection (Department) personnel conducted a compliance inspection of the above-referenced facility on November 14, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

Vincent Clark
Environmental Manager

Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Water Recovery LLC

On-Site Inspection Start Date: 11/14/2013

On-Site Inspection End Date: 11/14/2013

ME ID#: 36081

EPA ID#: FLR000069062

Facility Street Address: 1819 Albert St, Jacksonville, Florida 32202-1103

Contact Mailing Address: 1819 Albert St, Jacksonville, Florida 32202-1103

County Name: Duval

Contact Phone: (904) 475-9320

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Max Schwartz, Inspector; Greg Reynolds, VP

LATITUDE / LONGITUDE: Lat 30° 19' 35.9975" / Long 81° 37' 52.9911"

SIC CODE: 2992 - Manufacturing - lubricating oils and greases

TYPE OF OWNERSHIP: Private

Introduction:

Water Recovery, LLC (WR) was inspected by the Department of Environmental Protection's (DEP) Hazardous Waste Section on November 14, 2013, as an unannounced hazardous waste compliance evaluation inspection. WR is an industrial wastewater pre-treatment facility, a used oil processor (Permit number 79677-HO-07), used oil transporter and transfer facility, and marketer, used oil filter transporter and transfer facility, and filter processor. The facility was last inspected on September 26, 2012.

The facility consists of a main office, a used oil processing area, a wastewater processing area, a laboratory, and a solids/sludge/residues management area. Mr. Greg Reynolds, Vice President/General Manager, was present throughout the inspection.

Process Description:

Used Oil / Wastewater Processing Area:

WR treats and discharges wastewaters collected from marine, petroleum, transportation, environmental, and industrial sources. WR also receives leachate water from solid waste landfills. Incoming wastewaters are separated by type. Used oil, oily wastewaters and petroleum-contact water (PCW) are piped to the "black side" of the facility, which includes black tanks the facility uses in its used oil processing operations. All other wastewaters are piped to the "green side" of the facility, which uses green tanks.

Incoming oily wastewater, used oil, and PCW are treated by gravity separation and/or by dissolved air flotation. The waste is then chemically treated to adjust the pH in order to induce coagulation

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and flocculation. The wastewater fraction receives further treatment and processing, and it is then discharged to JEA. The solids, sludges, and residues generated from the facility's activities are de-watered, loaded into roll-off containers, analyzed, and then disposed at an appropriate disposal facility. Waste analysis records indicate that the solids are non-hazardous solid waste.

Pursuant to WR's used oil processor permit, all incoming shipments of used oil and PCW require a pre-approved waste profile before arriving at the facility. Upon arrival, the incoming material is sampled and compared to the fingerprint analysis for total organic halogen compounds (TOX), pH, flashpoint, and general physical appearance prior to final acceptance and off-loading. Oily wastewater is handled in the same manner; and, according to Mr. Reynolds, any water that has a visible sheen will also be screened for halogens.

All of the facility's used oil processing tanks were properly labeled. The used oil output area has additional secondary containment to capture any leaks from off-loading (Photo 1). This containment area is pumped out at the end of each day.

WR does not process used oil filters on-site. At the time of the inspection, no 55-gallon drums of used oil filters were on-site.

Laboratory:

Laboratory operations generate small amounts of hazardous waste solvents from analytical testing. The waste solvents (designated as D001/D002/D030/F003/F005 hazardous waste) are collected in a closed, labeled satellite container within the lab (Photo 2). According to the lab technician, WR generates about two 5-gallon buckets of this waste stream per year. At the time of the inspection, the 5-gallon bucket was full (dated 5/10/13) and was awaiting disposal.

Record Review

Outbound and inbound manifests had the proper EPA numbers, names, addresses, type/end used codes, and all applicable information required in Rule 62-710.510(1), FAC. The facility has submitted its annual used oil and PCW report.

A review of the facility's remaining operating records, required inspections, financial assurance records, and incoming and outgoing analysis found them to be in order. The facility's current used oil registration was on display, and a copy of its permit was available for review.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



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Signed:

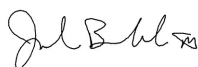
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

12/20/2013

DATE

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.