



# FLORIDA DEPARTMENT OF Environmental Protection

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

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

November 28, 2023

*Sent electronically to: [yuri.turovsky@liquidenviro.com](mailto:yuri.turovsky@liquidenviro.com)*

Mr. Yuri Turovsky, Plant Manager  
Liquid Environmental Solutions of Florida, LLC  
1640 Talleyrand Avenue  
Jacksonville, Florida 32206

**RE: Warning Letter No. WL23-225 (Significant Non-Complier)**  
**Liquid Environmental Solutions of Florida, LLC**  
**EPA/DEP ID: FLD981928484**  
**Duval County – Hazardous Waste**

Dear Mr. Turovsky:

A Hazardous Waste Compliance Inspection was conducted at your facility on August 17, 2023. During this inspection, possible violations of Chapters 376 and 403, Florida Statutes (Fla. Stat.), and Chapters 62-710 and 62-730, Florida Administrative Code (Fla. Admin. Code), were observed.

During this inspection, Department personnel noted the following:

- The facility did not complete hazardous waste determinations on two (2) waste streams.
- The facility did not keep two (2) boxes of universal waste lamps closed.
- The facility did not properly label two (2) boxes of universal waste lamps.
- The facility was unable to demonstrate how long two (2) boxes of universal waste lamps had been accumulating.
- The facility did not conduct the halogen screening prior to transport for four (4) loads of used oil.
- The facility did not provide adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

- There was one solid waste roll-off dumpster that was leaking liquid that contained a petroleum sheen onto the ground.
- Weekly tank inspections were not conducted during one (1) month and monthly tank inspections were not conducted during (2) months of the review period.
- One (1) container of used oil was not closed or otherwise protected from the weather.
- One (1) container of used oil filters was open and filled with water.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 376.121 and 403.121, Florida Statutes.

Please contact Bonnie Bradshaw at (904) 256-1638, or via email at [Bonnie.Bradshaw@FloridaDEP.gov](mailto:Bonnie.Bradshaw@FloridaDEP.gov), within 15 days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts that you may have which might help in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing our investigation and resolving this as soon as possible.

Sincerely,



Gregory J. Strong  
District Director

Attachment: Final Inspection Report

TK ec: FDEP-NED: Bonnie Bradshaw, Matt Kershner, Cheryl Mitchell, Joni Petry,  
Thomas Kallemeyn, DEP\_NED  
Liquid Environmental Solutions: Ken Khim, [ken.khim@liquidenviro.com](mailto:ken.khim@liquidenviro.com)



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

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**FACILITY INFORMATION:**

**Facility Name:** Liquid Environmental Solutions of Florida LLC

**On-Site Inspection Start Date:** 08/17/2023

**On-Site Inspection End Date:** 08/17/2023

**ME ID#:** 33798

**EPA ID#:** FLD981928484

**Facility Street Address:** 1640 Talleyrand Ave, Jacksonville, Florida 32206-5485

**Contact Mailing Address:** 1640 Talleyrand Ave, Jacksonville, Florida 32206-5485

**County Name:** Duval

**Contact Phone:** (904) 438-2138

**NOTIFIED AS:**

Used Oil, VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG **TSD:** Operating Non-Commercial TSD, Non-operating: Post-closure or Corrective Action Permit or Consent Order (HSWA, etc.) **Used Oil:** Off-Spec, Oil Filters, Processor **Other:** Both **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Used Oil Transfer Facility Facility  
Routine Inspection for Used Oil Processor Facility  
Routine Inspection for VSQG (<100 kg/month) Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Bonnie M Bradshaw, Inspector  
Other Participants: Kem Khim , Laboratory Manager

**LATITUDE / LONGITUDE:** Lat 30° 20' 36.3664" / Long 81° 37' 44.8878"

**NAIC:** 562219 - Other Nonhazardous Waste Treatment and Disposal

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Liquid Environmental Solutions of Florida, LLC. (LES) was inspected August 17, 2023, as a hazardous waste compliance inspection. LES was last inspected by the Department's Hazardous Waste Program on May 13, 2021. The facility is registered and operating as a Used Oil Transporter, Used Oil Filter Transporter, Used Oil Filter Transfer Facility and Used Oil Filter Processor. The facility is operating as a Very Small Quantity Generator (VSQG) of hazardous waste, an Off-Spec Used Oil Marketer and Petroleum Contact Water Transporter and Recoverer. The facility is permitted and operating as a Used Oil Processor. Joel Williams (LES Plant Supervisor) was present throughout the inspection of the plant. Kem Khim (LES) was present during the inspection of a majority of the plant, the laboratory and records.

The facility was issued Used Oil and Material Processing Facility permit number 72815-019-HO and Solid Waste permit number 72815-020-SO. These permits expire November 20, 2027. The facility is permitted to discharge wastewater generated during its operations to the city sewer under Industrial User Discharge Permit (IUDP) #019 issued February 1, 2023. This IUDP expires January 31, 2028.

LES manages non-hazardous, liquid and solid waste streams. LES is not a terminal receiver of solid waste, as it only processes spent industrial waste streams with the resulting solid waste being transported to a landfill. LES leases the property and buildings and has been operating at this location since December 23, 2009. LES has 12 plant operation employees and is on city water and sewer. LES operates Monday through Friday from 7:00 am

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to 6:00 pm and Saturday from 7:00 am to 12:00 pm.

The LES main administrative office is located across the street and north of the permitted operating facility. The permitted operating facility is comprised of a Laboratory Complex, the Used Oil Processing Area, the Oily Water Treatment Area, the Petroleum Contact Water Treatment Area, the Wastewater Treatment Area, the Plate and Frame Filter Press Area, the Solidification Pits, the Used Oil Filter and Container Storage Area, the Transportation Area, the Grease Waste Processing Area, the Maintenance Shop and the Solid Waste Accumulation Area.

**Process Description:****Laboratory Complex**

The Laboratory Complex is located in the northwest corner of the facility and consists of the Receiving Laboratory, "Back" Laboratory (trailer) and "Old" Laboratory.

Prior to trucks being off-loaded at one of three off-loading stations, LES personnel collect samples from all incoming liquid waste using a Composite Liquid Waste Sampler (COLIWASA) for fingerprint analysis. After sampling, the COLIWASA is placed in a secondary containment sump located outside and adjacent to the Receiving Laboratory for continuous use. Accumulated liquids are automatically pumped to one of the process tanks. There was one step-can for the collection of oily rags located adjacent to the COLIWASA sump. Rags are laundered weekly by Unifirst.

A portion of all used oil samples is maintained for 30 days in a refrigerator located outside the entrance of the Receiving Laboratory. The excess used oil that is not saved is taken directly to a processing tank for management as used oil. A fingerprint analysis is performed by the Receiving Laboratory for total organic halogens (TOH), at a minimum. Flashpoint, pH, and PCBs are also typically analyzed. Dextsil Chlor-D-Tect Q4000 (ethanol 3.33%, naphthalene 11.57%, mercuric nitrate in water 9.32%, and sulfuric acid in water containing <0.05% cadmium 68.64%; flashpoint 48°F to 162°F) is used to analyze TOH. The test kits come with a disposal ampule and instructions state that when the disposal instructions are followed, the test kits will pass a Toxicity Characteristic Leaching Procedure (TCLP) test. Spent test kits are disposed of in the trash. Occasionally, hexane extraction is used to analyze TOH. The hexane is disposed of with the sample and managed as used oil. 40 CFR 262.13(f)(1)(iii) allows this by stating that "if a very small quantity generator's wastes are mixed with used oil, the mixture is subject to 40 CFR Part 279." Dextsil Hydroscout test kits (calcium hydride 81.19%, water 18.81%, propylene glycol 6.58%; flashpoint 100-217°F), are sometimes used to measure oil content of a sample by adding a small quantity of a sample to the test kit vial. The test kit includes a disposal ampule and instructs users to dispose of the waste in the regular laboratory waste. The facility disposes of the spent vials in the trash. The facility is reminded that liquid used oil should not be disposed of in a landfill. Unused gray ampules (calcium hydride) are D001 hazardous waste.

A small amount of acetone is added to samples in order to run PCB and other tests. The lab manager stated that nearly all of the sample is consumed during the testing. Any spent acetone is collected and managed with used oil. The Lab Manager stated that approximately 200ml of spent acetone may be generated per quarter. Sample vials may be wiped with a re-usable wipe. When used as described, the wipes generate a non-hazardous waste. Wipes accumulated in the oily rag stepcan located adjacent to the COLIWASA sump.

Wastewater is tested by the Receiving Laboratory prior to discharge to ensure compliance with the wastewater permit. Chemical Oxygen Demand (COD) 20-1500 mg/l test kits (mercuric sulfate 1%, water 25%, chromic acid 1%, silver sulfate 3%, sulfuric acid 90%; flashpoint listed as not applicable) are used in this process. Spent COD vials are D002/D007/D009/D011 hazardous waste. Spent COD vials are collected in a 55-gallon drum stored on a spill pallet just outside of the Receiving Laboratory (Photo 1). The drum was closed, in good condition and labeled.

Wastewater total nitrogen and total phosphorus are also tested by the Receiving Laboratory using Hach total nitrogen reagents (sodium hydroxide <0.5%, sulfuric acid 90%, potassium persulfate 100%, sodium



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metabisulfite 100%, urea 35%, disodium salt chromatropic acid 10%, white quartz sand 70%, sodium metabisulfite 10%, flashpoint listed as not applicable) and total phosphorus reagents (ammonium molybdate 5%, ammonium metavanadate <1%, sulfuric acid 45%, potassium persulfate 100%, sodium hydroxide 15%; flashpoint listed as not applicable) included in test kits. Spent vials are D002 hazardous waste. The facility neutralizes the vials in the fume hood and disposes of the liquid in the Laboratory sink. The Laboratory sinks drain to a sump that is pumped back into the process. Unused components of the test kits may possibly be D001 /D002 hazardous waste.

Currently, the Laboratory sends wastewater samples to an outside laboratory to be analyzed for trace metals prior to discharge under the facility's IUDP. Wastewater samples are acidified with nitric acid. The facility representative stated that this process may be conducted in-house in the future. The facility is reminded that a hazardous waste determination should be conducted on any wastewater that is accumulated prior to discharge to a wastewater treatment unit and the wastewater managed accordingly.

Water and dish detergent is used to clean glassware. Solvents are no longer used.

The Back Laboratory performs used oil treatability testing. Demulsifiers and heat are used to conduct the testing. No hazardous waste is generated in this area.

The Old Laboratory is used only for storage. Laboratory operations no longer take place in this building. Spent fluorescent lamps generated by routine maintenance operations are stored in the Old Laboratory prior to shipment off-site. Pre-paid containers of spent lamps are shipped to Veolia for recycling. Spent lamps were last shipped in June 23, 2021. There were two boxes (19 lamps) of universal waste lamps accumulating at the time of inspection (Photo 2). The containers were not closed [40 CFR 273.13(d)(1)] or properly labeled [40 CFR 273.14(e)]. The facility was unable to demonstrate how long the universal waste lamps had been accumulating [40 CFR 273.15(c)].

Waste was stored in the area between the Old Laboratory and the Used Oil Processing Area, described below. This area is within the secondary containment. There were four 55-gallon drums of used oil filters stored north of the entrance to the secondary containment (Photo 3). All of the drums were properly labeled as "Used Oil Filters," but there was one drum that was open and filled with water (Photo 4) [62-710.850(5)(a), FAC]. In addition, because this area is within the secondary containment structure, it should be maintained free of vegetation and soil to allow for proper inspection. This is an Area of Concern.

There were also four totes of non-hazardous waste stored in this area. Waste was also stored south of the entrance to the secondary containment. There were two 55-gallon drums of used oil stored in this area. Both drums were properly labeled as "Used Oil," but one of these drums was open (Photo 5) [62-710.401(6), FAC]. There were also three 55-gallon drums of used oil filters that were properly labeled and closed and 22 containers of non-hazardous waste stored in this area.

#### Laboratory Records Review

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LES is currently operating as a VSQG of hazardous waste for small amounts of spent COD waste generated by the laboratory. The facility ships 275-300 pounds of COD waste one to two times per year. The COD waste is currently transported by EQ Industrial Services (MIK435642742). Waste was last transported on July 11, 2023.

#### Used Oil Processing Area

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The Used Oil Processing Area is primarily located in the southwest corner of the facility. Twenty aboveground tanks are dedicated for used oil processing with a total capacity of 342,175 gallons. The facility is authorized to store and use 95% of the total capacity, which is 335,332 gallons of used oil. Shipments of used oil are offloaded into Tank 51 that has a capacity of 15,000 gallons. The used oil is processed by gravity separation, heating and/or the addition of de-emulsifying chemicals. Typically, after treatment, the oil is transferred to Tanks

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24-26 (15,000 gallons each) and Tank 27 (15,700 gallons) to cool down. However, tanks 25 and 26 are temporarily being used to store processed water associated with grease waste. If no other processing is necessary, the oil is directed to Tank 54 (19,000 gallons), Tank 55 (9,750 gallons) and Tank 56 (20,000 gallons) for shipment off-site. The remaining tanks in this area are used for oil recirculation and storage and are as follows: Tank 10 (4,800 gallons), Tank 12 (7,800 gallons), Tank 14 (9,750 gallons), Tank 16 (16,075 gallons), Tank 18 (9,950 gallons), Tanks 19 and 22 (7,800 gallons each), Tank 23 (9,950), and Tank 101 (6,000 gallons). Tank 20 (7,800 gallons), previously used for oil recirculation/storage, is temporarily being used to store caustic. Tank 52 (15,000-gallons), previously used as a used oil off-load tank, was temporarily used to store grease waste and is currently out-of-service. Tank 53 (85,000-gallons), previously used for oil recirculation/storage, was temporarily used to store grease waste and is currently out-of-service.

Previously, gravity separated oily water from the used oil tanks was transferred to Tank 44, an oil/water separator with a capacity of 10,000 gallons. Gravity separated oily water from the used oil tanks is now transferred to one of the oily water tanks and Tank 44 is not in use. The oily water process is described below. Sludge and tank bottoms are not typically generated by used oil processing, but if solids are generated during tank clean-out, they would be run back through the process. All used oil tanks were properly labeled as "Used Oil" and appeared to be in good condition.

The used oil secondary containment area appeared to be in adequate condition. Re-sealing is usually conducted during the summer. The facility is reminded that any necessary re-sealing should be conducted as needed.

LES currently markets only off-specification used oil in batches of 13,000 gallons or more from Tank 54. Tank 55, previously also used to market off-specification used oil, is now used to store off-specification fuel for the boiler. Off-spec, outgoing shipments to used oil burners are analyzed for flashpoint, TOH and percent water. The facility is reminded that the analysis plan and regulation require that on-spec outgoing shipments to Used Oil Marketers and Processors be analyzed for pH, flashpoint, TOH, metals (arsenic, cadmium, chromium and lead) and PCBs. Used oil prepared for off-site shipment usually remains on-site for one to two weeks.

During a phone call subsequent to the inspection, Mr. Turovsky (Plant Manager) stated that the DEP permitting section was not consulted regarding the changes to what was being stored in the tanks or the discontinuation of the use of Tank 44, noted above. This is an Area of Concern. Mr. Turovsky also stated that the changes were temporary, but that the facility planned to make permanent changes in the future. The facility is reminded to consult the DEP permitting section to determine if a permit modification of any kind will be required.

#### Used Oil Processing Records Review

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Used oil processing records are maintained in the Receiving Laboratory for a minimum of three years. Used oil acceptance records reviewed included electronic manifests and off-loading tickets and an electronic database. Transporter addresses and telephone numbers, type code designations and halogen screening results are maintained in the electronic database. All other required information is included on manifests or offloading tickets. All acceptance records appeared in order.

All used oil sales transactions are recorded on an LES receipt of sale form and electronically retained. End use code designations and transporter addresses and telephone numbers were noted in the electronic database. All sales records reviewed appeared in order.

Used Oil Processor training records, permit records and annual reports were reviewed and appeared to be in order.

#### Oily Water Treatment Area

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The Oily Water Treatment Area tanks are located primarily on the interior portion of the north side of the facility.

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Eighteen tanks are used for oily water treatment with a total capacity of 282,540 gallons. The oily water tanks are configured as follows: Tank 1 and Tank 2 (27,270 gallons each), Tank 6 (62,000 gallons), Tank 70 (9,500 gallons), Tank 71 and Tank 72 (6,500 gallons each), Tank 83 and Tank 84 (5,500 gallons each), Tanks 85-88 (6,000 gallons each), Tank 91 and Tank 92 (5,000 gallons each), Tank 93 and Tank 94 (12,000 gallons each) and Tank 121 and 122 (37,000 gallons each).

Oily water is off-loaded from tank and vacuum trucks at one of three receiving stations located in front of the facility. From the receiving station, oily water is transferred to Tanks 1, 2, 6, 121 or 122 or to a tank for heat and emulsification treatment. From these tanks, oily water is transferred to the Dissolved Air Flotation (DAF) unit Tank 45 (2,000 gallons), DAF Inlet Tank 45A (1,000 gallons) and DAF Clarifier Tank 47 (4,200 gallons).

In the DAF tanks, wastewater liquid is chemically treated for pH adjustment to induce coagulation and flocculation. Separated solids/sludge/residues are pumped to the Solidification Pits described below for further processing. The treated wastewater is then discharged to the JEA POTW at Buckman Street under JEA IUD Permit #019.

All liquids accumulated in the secondary containment area collection system are transferred to Tank 1, 2, 6, 121 or 122 in the Oily Water Treatment Area for processing. The secondary containment area is comprised of an integrated stormwater, liquid and trench drainage collection system. Stormwater and liquids are collected in one of five sumps and a center-line trench drain located in the secondary containment area. One sump is between Tanks 9 and 37, two are adjacent to the side of Tank 6, one is adjacent to Tank 84 and one is between Tanks 92 and 91. The trench drain extends out from Tank 6 in the center of the secondary containment area.

#### Petroleum Contact Water (PCW) Treatment Area

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The facility receives PCW by tanker trucks. Incoming shipments of PCW are analyzed for pH, TOH and flashpoint. PCW is unloaded into Tanks 81 and 82 (5,000 gallons each), located to the north adjacent to the electrical shed. Product is phase separated, transferred to the oil processing tanks and sent off-site. Water associated with the product is treated as necessary prior to discharge to the POTW. The volume of PCW stored at the facility in Tanks 81 and 82 does not exceed 10,000 gallons at any given time. PCW remains on-site for 2-3 weeks before the recovered product is transported off-site. Outgoing shipments of recovered product are checked for percent water, TOH, and flashpoint and are shipped as off-specification fuel to a marketer. There are never any residual solids in the bottom of the PCW tanks according to the facility.

#### PCW Records Review

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Manifests were reviewed and included all required information for acceptance records, with the exception of the producer and transporter address which were included in the electronic database. Written assurance that PCW does not contain levels of hazardous constituents above those found in the source are included in the profile certification signed by the producers. A determination of the quantity of product in a particular load is based on analysis of the COLIWASA sample and used to calculate quantities listed in the annual reports.

All sales transactions are recorded electronically on an LES bill of lading and retained on-site for a minimum of three years. PCW records and annual reports for the previous three years were reviewed and appeared to be in order at the time of the inspection. PCW tanks are being inspected daily and documented on the "SPCC Weekly Inspection Log" weekly.

#### Wastewater Treatment Area

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The Wastewater Treatment Area is primarily located in the southeast corner of the facility. Fifteen tanks are dedicated to Wastewater Treatment with a total capacity of 247,150 gallons. The Wastewater Treatment Area consists of the following tanks: Tanks 7 and 8 (22,000 gallons each), Tank 9 (23,000 gallons), Tank 30 (500 gallons), Tank 31 (10,000 gallons), Tanks 32-34 (12,000 gallons each), Tank 35 (10,000 gallons), Tank 35A

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(11,650 gallons), Tanks 36 and 37 (20,000 gallons each), Tanks 38 and 39 (30,000 gallons each) and Tank 98 (12,000 gallons).

LES accepts only non-hazardous, non-biological industrial wastewater. Wastewater is derived from petroleum storage facilities, industrial processes, landfill leachate collection systems, tank cleaning, transportation and environmental remediation sources. Wastewater is received primarily from tank and vacuum trucks. Accepted shipments of wastewater are off-loaded at one of three receiving stations located in front of the facility. Wastewater is transferred to the DAF Unit, Inlet, and Clarifier tanks. In the DAF tanks, wastewater liquids are chemically treated to adjust the pH which induces coagulation and flocculation. Separated solids/sludge/residues are transferred to the Plate and Frame Filter Press Area for further processing as described below. The treated wastewater is then discharged to the JEA POTW at Buckman Street under IUD Permit #019. The wastewater discharge is monitored for permit compliance in a utility building located on site.

#### Plate and Frame Filter Press Area (PFFPA)

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The PFFPA tanks are located to the left of the main gate entrance to the facility and on the east side of the facility. Ten tanks are dedicated for the PFFPA with a total capacity of 89,500 gallons. The PFFPA tanks consists of: Tanks 61 and 62 (8,000 gallons each), wastewater solids Tank 60 (12,000 gallons), oily water slurry Tank 70 (9,500 gallons), DAF solids Tanks 89 and 90 (10,000 gallons each), FPA slurry Tanks 93 and 94 (12,000 gallons each) and the Plate and Frame Filter Press (PFFP) waste solids Tanks 95 and 96 (4,000 gallons each).

Waste solids collected from the wastewater and DAF tanks are transferred to the slurry tanks with combined liquids from the oily water slurry tank. The waste solids in the processing tanks are pH-adjusted by addition of a lime slurry from Tank 99 (1,000 gallons), ferric chloride from drums or zinc chloride from a small holding tank. The pH-adjusted slurry is then transferred to the PFFP waste solids tanks. In the PFFP waste solids tanks, treated waste solids are transferred into the PFFP. In between dewatering cycles, a pre-coat chemical is applied to the PFFP from Filter Press Pre-Coat Tank 97 (1,000 gallons). This process ensures dewatered waste solids are dropped into an awaiting hopper. The dewatered waste solids are transported by Hull's Environmental and disposed of at the Camden County, Georgia Municipal Waste Landfill approximately 10 times per month. The facility currently analyzes PFFP solids quarterly for Toxicity Characteristic Leaching Procedure (TCLP) metal, semi-volatile and volatile constituents. Results reviewed since the previous inspection have indicated the waste is non-hazardous, however, the Method Detection Limit (MDL) for 2,4-dinitrotoluene for the sample collected July 12, 2023, was above the regulatory limit. Therefore, a complete hazardous waste determination did not occur [40 CFR 262.11]. Subsequent to the inspection, it was determined that a retain sample was still available and would be re-analyzed. At the time of inspection there was also no documentation that the samples collected January 5, 2022, and October 5, 2022, had been properly preserved at 4-6°C. The laboratory provided documentation subsequent to the inspection that the samples had been properly preserved, however, the facility is reminded that this should be properly documented on the chain-of-custody.

#### Solidification Pits

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Two open, concrete and steel lined Tanks, 61 and 62, are dedicated for solids and sludge solidification and have a total capacity of 16,000 gallons (Photo 6). The facility solidifies materials such as non-hazardous wastewater with high solids content, and occasionally, latex paint, etc. The facility uses the waste profile, SDS and/or analytical testing to ensure that the waste is non-hazardous. The facility is reminded that it is not permitted to accept any hazardous waste. A heavy screen cage is used to physically separate the liquids from the solids in each tank. Facility staff use a large suction hose to transfer the liquid portion of wastewaters to one of the oily water tanks. Removal of liquid oily waste from the tank during the solidification process reduces the overall waste volume. Off-specification products, paints and other non-wastewaters would not be suctioned and would be solidified directly. Bails of absorbent paper dust material are used for solidification. Waste solids are placed into a roll-off container that is transported by Hull's Environmental to the Camden County, Georgia Municipal Waste Landfill approximately 10 times per month. The facility currently analyzes the waste solids

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quarterly for Toxicity Characteristic Leaching Procedure (TCLP) metal, semi-volatile and volatile constituents. Results reviewed since the previous inspection have indicated the waste is non-hazardous, however, the Method Detection Limit (MDL) for 2,4-dinitrotoluene for the sample collected July 12, 2023, was above the regulatory limit. Therefore, a complete hazardous waste determination did not occur [40 CFR 262.11]. Subsequent to the inspection, it was determined that a retain sample was still available and would be re-analyzed. At the time of inspection there was also no documentation that the samples collected January 5, 2022, and October 5, 2022, had been properly preserved at 4-6°C. The laboratory provided documentation subsequent to the inspection that the samples had been properly preserved, however, the facility is reminded that this should be properly documented on the chain-of-custody.

#### Used Oil Filter and Container Storage Area

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The Container Storage Area is approximately 1,000 square feet. The facility stores non-hazardous waste, oil contaminated solid waste and other waste for solidification in this area. The facility also stores chemicals, such as off-specification caustics, that can be used in the process. All containers were stored on an oil-impervious surface within the secondary containment. Some containers could not be inspected due to inadequate aisle space which would allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment (Photo 7) [40 CFR 279.52(a)(5)]. Several containers were open (Photo 8) and there were three 55-gallon drums of non-hazardous paint related material that were bulging (Photo 9). Subsequent to the inspection, these drums were emptied and managed as non-hazardous waste. The facility is reminded to accumulate all waste in a manner that prevents releases and other safety issues.

Used oil filters are stored on a rack adjacent to the Container Storage Area described above. The facility is a registered used oil filter processor and transporter, however, the facility does not currently transport or process the used oil filters. The facility receives a small number of used oil filters which are shipped off-site for recycling as needed. The filters arrive at the facility in drums, and any free liquids inside the drum are pumped out and processed as used oil prior to off-site disposal. After removal of any free liquids, the drums are placed onto the rack in the Used Oil Filter and Container Storage Area until they can be picked-up for management by Safety Kleen Systems, Inc. There were eight drums of used oil filters stored on the rack at the time of inspection (Photo 10). The drums were closed, properly labeled and stored on an oil-impermeable surface.

#### Used Oil Filter and Container Storage Area Records

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Records indicate that used oil filters have not been transported since the previous inspection and were last transported by Safety Kleen Systems, Inc. on March 24, 2021. Used oil filter transportation records appeared in order.

#### Transportation Area

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LES primarily accepts shipments from third party carriers, however, LES is registered as a Used Oil Transporter and occasionally transports the wastes treated at the facility. Mr. Turovsky stated that used oil is not stored in trucks for more than 24 hours and is typically unloaded or dispatched immediately.

The Transportation Area is a large sand lot where the facility parks its tanker trucks, disconnected semi-truck trailers and tankers (Photo 11). A small building located in this area has been converted into office space and a shop for transportation activities since the previous inspection. This area is located on a separate parcel and leased from a separate party. No hazardous waste is generated in this area. Vehicles are serviced off site. There were no containers accumulating in this area.

#### Transportation Records

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Transportation records were reviewed. The facility did not document the halogen screening prior to transport for four loads of used oil transported on June 14, 2023, May 3, 2023, April 26, 2023 and January 25, 2023 [40 CFR

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279.44(a); 62-710.510(1)(g), FAC]. Records of halogen screening conducted upon receipt at the facility are maintained. Other transportation records reviewed appeared to be in order.

Training provided for used oil transportation personnel includes a review of the state and federal used oil regulations, review of halogen screening requirements and procedures, emergency response procedures and review of the Spill Prevention, Control, and Countermeasures (SPCC) Plan/Contingency Plan. Training records appeared to be in order.

#### Grease Waste Processing Area

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The facility processes grease waste that is exempt from industrial discharge requirements. Grease waste is screened for large solids in Tank 115 (4,000 gallons) and then placed into Tank 110 (20,000 gallons), Tank 111 (20,000 gallons), Tank 112 (37,000 gallons), Tank 113 (37,000 gallons) or Tank 114 (37,000) for gravity separation. Liquids generated by this process are then processed as wastewater. Solids are sent to an LES facility in Kissimmee, Florida for separation of the brown solids by centrifuge. These brown solids are then marketed as a product. The facility was in the process of installing its own centrifuge and associated equipment and was testing this equipment at the time of inspection (Photos 12 and 13). It does not appear the Department's permitting section has been notified of this activity. This is an Area of Concern. The secondary containment surrounding one piece of this equipment contained grease-impacted water (Photo 14). The secondary containment wall had a breach and the grease-impacted water was released to the ground (Photos 15-17). This is an Area of Concern. The breach was temporarily plugged during the inspection.

#### Maintenance Shop

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The maintenance shop is located on the far northeastern corner of the facility adjacent to Seventh Street. The maintenance shop performs routine and preventative maintenance for the facility. Some painting and welding is conducted. The facility is reminded that paint, thinners and/or applicators may generate a hazardous waste and that a hazardous waste determination should be conducted prior to disposal. Scrap welding rods are managed as scrap metal.

No used oil is generated by the maintenance shop. There was, however, one used oil rag step can located in the shop. Rags are laundered weekly by Unifirst. No lead acid batteries are generated at the facility. All truck maintenance is conducted off-site.

#### Solid Waste Accumulation Area

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Solid waste generated in the Solidification Pits and PFFPA, described above, is accumulated in roll-off dumpsters located just north of the off-loading stations. There were two roll-off dumpsters present at the time of inspection. The roll-off dumpsters are covered by tarps. One of the dumpster tarps had accumulated rainwater which was leaking into the dumpster and leaking out the bottom. A slight sheen was visible on the water that had leaked out (Photo 18) [40 CFR 279.54(g)]. The facility sealed the leak and cleaned up the impacted soil at the time of inspection.

#### Record Review

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LES is currently operating as a VSQG of hazardous waste for small amounts of lab waste. The facility ships 275-300 pounds of COD waste one to two times per year. The COD waste is currently transported by EQ Industrial Services (MIK435642742). Waste was last transported on July 11, 2023. The facility had its current "Used Oil" registration form displayed from the Department and has submitted its current certificate of liability insurance. LES has also submitted its 2022 Used Oil and PCW annual report to the Department's Tallahassee office.

LES operating records, including personnel training hazardous waste determinations and the Contingency Plan were reviewed and appeared to be in order. Internal inspection records were also reviewed. Tank and container

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inspections required by the permit are documented on the "SPCC Weekly Inspection Log," STI SP001 Monthly Inspection Checklist" and "SPCC Monthly Spill Contingency Inventory" forms. SPCC Weekly Inspections were not conducted during the month of June 2023 and STI SP001 Monthly Inspections were not conducted during May and June of 2023 [403.727(1)(c), Florida Statute; Permit Condition Part II Subpart C Item 5]. The SPCC /Contingency Plan was last reviewed on September 16, 2022.

#### For Outstanding Items of Potential Non-Compliance

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Please review the following section – New Potential Violations and Areas of Concern. This section includes potential violations observed at your facility during this inspection. For any potential violations below that have not been corrected, please refer to the Corrective Action for each item that is suggested to bring your facility into compliance. Once the corrective action has been completed, please send documentation to the Principal Inspector listed on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

#### Areas of Concern:

1. Laboratory Complex: There was soil and vegetation within the secondary containment. No further action is required. The facility resolved this issue in an email dated October 10, 2023.
2. Used Oil Processing Area: Temporary changes were made to what is/was being stored in some tanks in this area and use of the oil/water separator was discontinued without consultation with the DEP permitting section. The facility should reach out to the solid and hazardous waste permitting sections to determine if any type of notification or permit modification regarding the temporary changes is required. The facility should also reach out to the solid and hazardous waste permitting sections to determine what actions will be required prior to making any permanent changes.
3. Grease Waste Processing Area: New grease processing equipment has been installed. The facility should reach out to the solid and hazardous waste permitting sections to determine if any type of notification or permit modification is required.
4. Grease Waste Processing Area: The secondary containment wall surrounding the newly installed grease processing waste equipment had a breach and grease-impacted water was released to the ground. No further action is required. The facility resolved this issue in emails dated August 23, 2023, and October 10, 2023.

#### New Potential Violations and Areas of Concern:

##### Violations

Type:	Violation 1
Rule:	262.11
Explanation:	The facility did not conduct an accurate hazardous waste determination on the following wastestreams: <ol style="list-style-type: none"><li>1. Plate and Frame Filter Press Area: Plate and Frame Filter Press Solids</li><li>2. Solidification Pits: Solidification Pit Solids</li></ol>
Corrective Action:	In order to return to compliance, the facility should re-analyze retain samples if still available and/or provide information indicating how the hazardous waste determination was conducted in the absence of the adequate analytical data. The facility should also follow the operating procedure that it outlined in its letter to the Department dated October 28, 2021.

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Type: Violation 2  
Rule: 273.13(d)(1)  
Explanation: Laboratory Complex: There were two boxes containing 19 universal waste lamps that were not accumulated in closed containers.  
Corrective Action: No further action is required. The facility returned to compliance in an email dated October 10, 2023.

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Type: Violation 3  
Rule: 273.14(e)  
Explanation: Laboratory Complex: There were two boxes containing 19 universal waste lamps that were not properly labeled.  
Corrective Action: No further action is required. The facility returned to compliance in an email dated October 10, 2023.

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Type: Violation 4  
Rule: 273.15(c)  
Explanation: Laboratory Complex: The facility was unable to demonstrate how long two boxes containing 19 universal waste lamps had been accumulating.  
Corrective Action: In order to return to compliance, the facility should either mark the containers with the accumulation start date or use another method which clearly demonstrates the length of time that the universal waste has been accumulated or provide documentation that the spent bulbs have been shipped off-site to an appropriate facility.

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Type: Violation 5  
Rule: 279.44(a), 62-710.510(1)(g)  
Explanation: The facility did not document the halogen screening prior to transport for four loads of used oil transported on June 14, 2023, May 3, 2023, April 26, 2023 and January 25, 2023.  
Corrective Action: No further action is required. The facility returned to compliance in an email dated October 10, 2023.

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Type: Violation 6  
Rule: 279.52(a)(5)  
Explanation: Used Oil Filter and Container Storage Area: The facility did not provide adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.  
Corrective Action: Used Oil Filter and Container Storage Area: In order to return to compliance, the facility should accumulate containers in this area in a manner which allows the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

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Type: Violation 7  
Rule: 279.54(g)  
Explanation: Solid Waste Accumulation Area: One solid waste roll-off dumpster was leaking liquid with a sheen.  
Corrective Action: No further action is required. The leak was stopped and the impacted soil was cleaned up at the time of inspection.

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Type: Violation 8  
Rule: 403.727(1)(c)  
Explanation: SPCC Weekly Inspections were not conducted during the month of June 2023 and STI SP001 Monthly Inspections were not conducted during May and June of 2023.  
Corrective Action: No further action is required. Inspections were conducted as required subsequent to these dates, but the facility should ensure inspections are conducted at the required frequencies noted in the permit moving forward.

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Type: Violation 9  
Rule: 62-710.401(6)  
Explanation: Laboratory Complex: One 55-gallon drum of used oil was not closed or otherwise protected from the weather.  
Corrective Action: No further action is required. The facility returned to compliance in an email dated October 10, 2013.

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Type: Violation 10  
Rule: 62-710.850(5)(a)  
Explanation: Laboratory Complex: There was one 55-gallon drum of used oil filters that was open and filled with water.  
Corrective Action: No further action is required. The facility returned to compliance an an email dated October 10, 2023.

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**PHOTO ATTACHMENTS:**

Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8





Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14





Photo 15



Photo 16



Photo 17



Photo 18



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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

Bonnie M Bradshaw**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**11/12/2023**Date**Kem Khim**Representative Name**Laboratory Manager**Representative Title**Liquid Environmental Solutions**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:**Bonnie M Bradshaw**Inspection Approval Date:**11/12/2023