



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Dorado Custom Boats LLC
On-Site Inspection Start Date: 04/30/2012 **On-Site Inspection End Date:** 05/04/2012
ME ID#: 46875 **EPA ID#:** FLR000017087
Facility Street Address: 720 Hedden Ct, Ozona, Florida 34660
Contact Mailing Address: 720 Hedden Ct, Ozona, Florida 34660
County Name: Pinellas **Contact Phone:** (727) 786-3800

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Compliance Assistance Site Visit Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Manager
Other Participants: Glen Carlin

LATITUDE / LONGITUDE: Lat 28° 3' 55.3897" / Long 82° 46' 27.5806"

SIC CODE: 3732 - Manufacturing - boat building and repairing

TYPE OF OWNERSHIP: Private

Introduction:

Dorado Powerboats notified as a small quantity generator at this location in May of 1996. Dorado Powerboats Inc. was an active corporation until it was administratively dissolved in 1998. Several other corporations operated on the property using variations on the name, such as Dorado Holdings, LLC. Since the previous notification, the parcel's street address was also changed, and Department records have been updated to show this. A new operator, Dorado Custom Boats LLC, began operation at the property approximately three months ago. The business was incorporated in August 2011, and has obtained an air permit through the Pinellas County Division of Air Quality. The company has hired Glen Carlin to handle compliance with environmental, safety and health regulations. Mr. Carlin has extensive experience in the boat building industry, and anticipates that the business will eventually be a small quantity hazardous waste generator, although it is a conditionally exempt generator at this time. A number of areas of concern are noted at the end of this inspection report that summarize the additional steps the company should take in order to be in full compliance with small quantity generator regulations.

Process Description:

During the initial visit to the site, Mr. Carlin was not at the facility. However, the waste accumulation area was inspected, along with a satellite accumulation station used for tool cleaning in the layup area. The satellite station held three unlabeled plastic buckets of used acetone. Lids were on the containers, but they were not closed tightly.

The waste accumulation area held two 55 gallon drums of still bottoms, plus two open 55 gallon drums containing liquid on a containment pallet. None of the drums were labeled "hazardous waste" or marked with accumulation start dates. A closed head drum appeared to be collecting used acetone, and had an open funnel in the bung hole. The other drum of liquid had an open head, but the liquid within did not have an acetone odor. During the follow up visit with Mr. Carlin, all containers were labeled and full containers were dated. The satellite accumulation area exemption was discussed, and Mr. Carlin said that he would mark an accumulation start date on the container accumulating used acetone. Mr. Carlin said that he was not completely sure of the

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identity of the liquid in the open head drum, but that it would be identified and disposed of properly. Mr. Carlin intends to use Advantage Environmental to assist with profiling the company's waste and arrange for disposal. Howco will dispose of the company's used oil and waste fuel.

A still was adjacent to the drums. Mr. Carlin said that the still was functional, but was not yet being used because the company had only needed to purchase two drums of acetone since beginning operation. The accumulation of still bottoms had been left by the previous operator. Mr. Carlin was making arrangements for the still to be inspected and for maintenance. Mr. Carlin plans to test the still using virgin acetone prior to recycling spent acetone. Once the still is placed into service, Mr. Carlin will maintain logs to document the amount of used acetone being generated and reclaimed.

Dorado occupies about half the footprint of the previous operation. The north half of the property is occupied by a sign company that does not appear to generate hazardous waste. CNC routing and digital printing appear to be the only processes used. Part of the property is also being used for storage of trailers and equipment by the property owner. Several debris piles were on site. It is recommended that unusable parts and debris be disposed of, as aisle space is not adequate at this time to provide access for equipment. Evacuation routes are impeded.

Dorado currently plans to produce two hulls, a 23 foot and a 30 foot outboards. The company inherited a larger boat, which is being assembled, but no new models of that size are planned. The company's web site indicates a 40 ft inboard could be produced. Dorado uses conventional hand layup construction using polyester resin. At this time, no new molds are planned, although some of the profiles may be changed on the existing molds, which were acquired from other corporations. The company has about 12 employees at this time. A number of the molds on site are for larger boats the company has no plans to build, and these may be eventually sold.

Mr. Carlin has extensive experience in the industry, and is in the process of developing training programs and setting up environmental management systems. An OSHA compliance audit has been conducted by USF, and recommendations will be implemented upon receipt of the audit findings.

At the time of the inspection, the facility was a conditionally exempt small quantity generator. Regulatory requirements for treating off specification resin were discussed. Treatment by polymerization is permissible in accordance with 40 CFR Part 268.40, provided the facility complies with 40 CFR 268.7 and 268.9 requirements. Small and large quantity generators must have a written waste analysis plan and must certify that the treatment has been effective prior to disposing of the solidified resin. The waste must be counted towards the facility's monthly rate of generation.

Weekly container inspections were not being done yet, and recordkeeping recommendations were made. No waste shipment had yet been made by the company. Mr. Carlin had a manifest for a shipment by Dorado Holdings in 2008, which appears to have been the last shipment from the facility prior to the inspection. In lieu of a full contingency plan, Mr. Carlin may post emergency information in accordance with small quantity generator regulations as a best management practice, until the facility becomes a small quantity generator.

New Potential Violations and Areas of Concern:

Small Quantity Generator Checklist

Type:	Area Of Concern
Rule:	262.12(a)
Question Number:	4.10
Question:	Has the facility obtained an EPA ID number?
Explanation:	The EPA identification number for the facility was issued to a previous operator, Dorado Powerboats. It should not be used by Dorado Custom Boats unless an

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updated notification form is filed. This is required if the facility generates more than 220 lb of hazardous waste in a calendar month.

Corrective Action: Dorado Custom Boats must submit a new notification form updating the facility information and generator status to the Department.

Type: Area Of Concern

Rule: 262.34(d)(4)

Question Number: 4.250

Question: Is each container marked with the beginning date of accumulation?

Explanation: On the first day of the inspection, containers holding hazardous waste were not marked with the date the container began accumulating hazardous waste. This requirement does not apply to satellite containers that hold 55 gallons of waste or less at or near the point of generation, provided the container is marked to identify the contents and closed.

Corrective Action: Ensure that containers are marked with accumulation start dates.

Type: Area Of Concern

Rule: 262.34(a)(4)

Question Number: 4.260

Question: Is each container and tank marked with the words "Hazardous Waste"?

Explanation: On the first day of the inspection, some containers holding hazardous waste were not labeled. (Corrected)

Corrective Action: Containers accumulating hazardous waste must be labeled with the words "Hazardous Waste."

Type: Area Of Concern

Rule: 265.35

Question Number: 4.430

Question: Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed?

Explanation: Aisle space was obstructed by an accumulation of equipment, molds and debris in a number of places.

Corrective Action: Ensure that aisle space is adequate so that evacuation routes and access to emergency equipment and working areas is not blocked.

Type: Area Of Concern

Rule: 262.11

Question Number: 4.1

Question: Did the facility conduct a waste determination on all wastes generated?

Explanation: A hazardous waste determination is required for the container of liquid accumulated in the open head drum adjacent to the still.

Corrective Action: Conduct a hazardous waste determination on the contents of this container and

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dispose of the material accordingly.

Small Quantity Generators Containers Storage Checklist

Type: Area Of Concern
 Rule: 265.173(a)
 Question Number: 2.40
 Question: Are the containers kept closed except when adding or removing wastes?
 Explanation: Containers holding hazardous waste were not closed.
 Corrective Action: All containers holding hazardous waste must be closed, except when adding or removing waste.

Type: Area Of Concern
 Rule: 62-730.160(6)
 Question Number: 2.70
 Question: Are records kept including:
 Explanation: Hazardous waste containers must be inspected weekly, and records must be kept for three years that include the information specified in the regulation.
 Corrective Action: Inspection records must be kept that include the date and time of the inspection, the legibly printed name of the inspector, the number of containers in storage, the condition of the containers, notes on observations made and the date and nature of corrective actions.

Summary of Potential Violations and Areas of Concern:Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Small Quantity Generator Checklist 262.12(a)		04/30/2012	The EPA identification number for the facility was issued to a previous operator, Dorado Powerboats. It should not be used by Dorado Custom Boats unless an updated notification form is filed. This is required if the facility generates more than 220 lb of hazardous waste in a calendar month.
262.34(d)(4)		04/30/2012	On the first day of the inspection, containers holding hazardous waste were not marked with the date the container began accumulating hazardous waste. This requirement does not apply to satellite containers that hold 55 gallons of waste or less at or near the point of generation, provided the container is

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Rule Number	Area	Date Cited	Explanation
			marked to identify the contents and closed.
262.34(a)(4)		04/30/2012	On the first day of the inspection, some containers holding hazardous waste were not labeled. (Corrected)
265.35		04/30/2012	Aisle space was obstructed by an accumulation of equipment, molds and debris in a number of places.
262.11		04/30/2012	A hazardous waste determination is required for the container of liquid accumulated in the open head drum adjacent to the still.
Small Quantity Generators Containers Storage Checklist			
265.173(a)		04/30/2012	Containers holding hazardous waste were not closed.
62-730.160(6)		04/30/2012	Hazardous waste containers must be inspected weekly, and records must be kept for three years that include the information specified in the regulation.

Conclusion:

Dorado Custom Boats was in compliance with hazardous waste regulations applicable to conditionally exempt small quantity generators at the time of this compliance assistance site visit. In order to maintain status as a CESQG, the company must make arrangements for proper disposal of the hazardous waste on site prior to accumulating 1,000 kg of waste. As the company anticipates becoming a small quantity generator in the future, the items identified as areas of concern above should be addressed in order to ensure that the facility is in compliance if the generation rate increases.

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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.

Elizabeth Knauss	Environmental Manager
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE

	FDEP - SWD	5/31/2012
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION	DATE

Glen Carlin
REPRESENTATIVE NAME

NO SIGNATURE	Dorado Custom Boats
REPRESENTATIVE SIGNATURE	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.