



Inspector

# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

July 15, 1996

CERTIFIED MAIL - RETURN RECEIPT

Mr. Tim Rudolph  
Environmental Recovery, Inc.  
251 Levy Road  
Atlantic Beach, Florida 32233

Dear Mr. Rudolph:

Environmental Recovery, Inc.  
DEP/EPA ID FLD 092 718 576  
Duval County - Used Oil

Enclosed is a copy of the checklists that were used during the June 27, 1996 used oil audit conducted by this office.

If you have any questions regarding this letter or used oil regulations, please contact this office for assistance. Thank you for your time and continued cooperation.

Sincerely,

Pamela Fellabaum  
Environmental Specialist

✓  
PF:aw

enclosure



# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

## USED OIL INSPECTION REPORT

1. INSPECTION REPORT  COMPLAINT  ROUTINE  FOLLOW-UP  PERMITTING

FACILITY NAME Environmental Recovery, Inc DEP/EPA ID FLD092718576

STREET ADDRESS 251 Levy Road, Atlantic Beach, Florida 32233

MAILING ADDRESS same

COUNTY Duval PHONE (904) 241-2200 DATE 06/27/96 TIME 8:00

### TYPE OF FACILITY:

#### Generator Status

Conditionally Exempt (<100 kg/mo)

SQG (100-1000 kg/mo)

Generator (>1000 kg/mo)

Non-Handler

#### Storage

Container

Tank

Waste Pile

Surface Impoundment

#### Treatment

Tank

Land Treatment

Thermal

Chem/Phys/Bio.

Incinerator

Surface Impoundment

#### Transporter

Transporter

Transfer Facility

#### Disposal

Landfill

Surface Impoundment

Waste Pile

#### Used Oil

Transporter

Transfer Facility

Processor/Refiner

Off-Spec Burner

Marketer

Used Oil Filter Transporter

Used Oil Filter Transfer Facility

Used Oil Filter Proc.

### 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 Official: Mr. Russell Gordon

4. Survey Participants & Principal Inspector: Mr. Tim Rudolph, ERI  
Ashwin Patel, FDEP Pam Fellabaum, FDEP

Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

Permit No.: S016-269358 Date Issued: 5/17/95 Exp. Date: 4/18/00

Pre-arranged Inspection:  Yes  No

USED OIL GENERATOR CHECKLIST

Facility Name: Environmental Recovery Inc Date: 6/27/96  
 Facility Representative: Tim Rudolph Facility ID #: FLD 692718576  
 SIC Codes: \_\_\_\_\_ Inspector: Fellbaum

40 CFR 279 Subpart C -- Generator Standards

1. Describe the facility's used oil streams:

WASTE DESCRIPTION	ON/OFF Specification	Testing or Process Knowledge	Generation Rate	Disposal Facility and EPA ID
used oil	on	PN	Varies	Varies

2. Does the generator mix hazardous waste with the used oil?(279.10) Y \_\_\_ N X

3. If so, is the facility a CESQG? Y \_\_\_ N \_\_\_

4. if not, Is the oil mixed with a characteristic hazardous waste?  
(describe waste) Y \_\_\_ N \_\_\_

If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste? Y \_\_\_ N \_\_\_

Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable? Y \_\_\_ N \_\_\_

If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.

5. Does the facility generate other materials contaminated with used oil? Y X N \_\_\_

If so, are the materials burned for energy recovery as used oil? Y \_\_\_ N \_\_\_

or, Does the facility have records documenting the residuals are not hazardous waste? Y X N \_\_\_

*TECP benzene metals*

6. Does the generator claim that the used oil meets the specification in 279.11? Y X N \_\_\_

If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H

Subpart C

1. Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? Y X N \_\_\_\_\_

Are containers/tanks in good condition? (279.22(b)(1)) Y X N \_\_\_\_\_

Are containers/tanks leaking? (279.22(b)(2)) Y \_\_\_\_\_ N X

Are containers/tanks storing used oil marked with the words "Used Oil", including fill pipes used to fill underground tanks? (279.22(c)) Y X N X

*not all tanks - see process list*

2. Are used oil filters stored in above ground containers which are: (62-710.850(6))

In good condition? Y \_\_\_\_\_ N site

Closed or otherwise protected from weather? Y \_\_\_\_\_ N \_\_\_\_\_

Labeled "Used Oil Filters"? Y \_\_\_\_\_ N \_\_\_\_\_

Stored on an oil impervious surface? Y \_\_\_\_\_ N \_\_\_\_\_

3. Have any releases to the environment occurred, other than a leak from a UST? Y \_\_\_\_\_ N X

If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service? (279.22(d)) Y \_\_\_\_\_ N \_\_\_\_\_

4. Does the generator burn on site in a space heater? (279.23) Y \_\_\_\_\_ N X

If so, does he burn only DIY oil or oil generated on site? Y \_\_\_\_\_ N \_\_\_\_\_

Does the heater have a capacity of no more than 0.5 million BTU/hr? Y \_\_\_\_\_ N \_\_\_\_\_

Are combustion gasses vented to the atmosphere? Y \_\_\_\_\_ N \_\_\_\_\_

5. Does the generator only use transporters who have received EPA Identification numbers?

Name and number ERI

6. If not, does the generator self-transport only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Y \_\_\_\_\_ N \_\_\_\_\_ NA

Name and location of center: \_\_\_\_\_

Location of generator aggregation point \_\_\_\_\_

If so, is this only in vehicles owned by the facility or facility employees? Y \_\_\_\_\_ N \_\_\_\_\_

Is no more than 55 gallons transported at one time? Y \_\_\_\_\_ N \_\_\_\_\_

7. Alternatively, does the generator have a tolling arrangement with a used oil reclaimer? Y \_\_\_\_\_ N \_\_\_\_\_ NA

Is a copy of the contract kept on site specifying

type and frequency of shipments? Y \_\_\_\_\_ N \_\_\_\_\_

that the transport vehicle is owned by the processor? Y \_\_\_\_\_ N \_\_\_\_\_

that the reclaimed oil will be returned to the generator? Y \_\_\_\_\_ N \_\_\_\_\_

**USED OIL TRANSPORTER CHECKLIST**

Facility Name: Environmental Recovery Tre Date: 6/27/96  
 Facility Representative: Tim Rudolph Facility ID #: FLD 092 7185 76  
 Inspector: Fellbaum Registration # \_\_\_\_\_

**40 CFR 279 Subpart E -- Transporter Standards**

1. Is the facility exempt under any of the following? (279.40(a)) Y \_\_\_ N X  
 On site transport?  
 Generator transporting < 55 g /time to a collection center?  
 Transporter of < 55 g /time from generator to aggregation point owned by same generator ?
  
2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) Y X N \_\_\_
  
3. Does the transporter process used oil incidental to transport? (279.41) Y \_\_\_ N X  
 Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A \_\_\_ Y \_\_\_ N \_\_\_  
 If not, has the transporter conducted a hazardous waste determination? (279.10(e)) N/A \_\_\_ Y \_\_\_ N \_\_\_
  
4. Has the facility notified of used oil activities? Check EPA form 8700-12 Y X N \_\_\_
  
5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a)) Y X N \_\_\_
  
6. Does the transporter comply with DOT requirements? (279.43(b)) Y X N \_\_\_
  
7. If any oil is discharged during transport, does the transporter: (279.43(c)) will  
 Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Y \_\_\_ N \_\_\_  
 Report to DOT in writing per 49 CFR 171.16? Y \_\_\_ N \_\_\_  
 Clean up any discharges until the discharge poses no threat? Y \_\_\_ N X
  
8. Does the facility also transport used oil filters? Y X N \_\_\_  
 If so, are the filters stored in above ground containers which are: (62-710.850(6)) no filters  
 In good condition? Y \_\_\_ N \_\_\_  
 Closed or otherwise protected from weather? Y \_\_\_ N X  
 Labeled "Used Oil Filters"? Y \_\_\_ N X  
 Stored on an oil impervious surface? Y \_\_\_ N \_\_\_

See  
 site  
 list

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

### Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y \_\_\_ N \_\_\_

EPA ID # of oil provider (if applicable)?

Y \_\_\_ N \_\_\_

Quantity of oil shipped?

Y \_\_\_ N \_\_\_

Date of shipment?

Y \_\_\_ N \_\_\_

Signature of oil provider, dated upon receipt?

Y \_\_\_ N \_\_\_

*Did not review records*

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y \_\_\_ N \_\_\_

EPA ID # of receiving facility or transporter?

Y \_\_\_ N \_\_\_

Quantity of oil delivered?

Y \_\_\_ N \_\_\_

Date of delivery?

Y \_\_\_ N \_\_\_

Signature of oil receiver, dated upon receipt?

Y \_\_\_ N \_\_\_

*↓*

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))

Y \_\_\_ N \_\_\_

4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y \_\_\_ N \_\_\_

5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y \_\_\_ N \_\_\_

*Tally*

If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y \_\_\_ N \_\_\_

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y \_\_\_ N \_\_\_

*will*

### Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)

Y X N \_\_\_

2. Does the facility maintain training records? (62-710.600(2)(c))

Y \_\_\_ N \_\_\_

*Did not review*

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))

Y \_\_\_ N \_\_\_

*Tally*

4. Is the facility registration form and ID number displayed? (62-710.500)

Y X N \_\_\_

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

Transfer Facility Standards - 279.45

1. Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F  
N/A \_\_\_ Y \_\_\_ N \_\_\_  
Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y \_\_\_ N \_\_\_
2. Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?  
Y \_\_\_ N \_\_\_  
Is this done by testing? Y \_\_\_ N \_\_\_  
Is this done by process knowledge? Describe basis in narrative. Y \_\_\_ N \_\_\_  
Are test records or copies of records providing basis for determination kept for 3 years? Y \_\_\_ N \_\_\_
3. Have any analyses showed exceedances of the 1,000 ppm level? Y \_\_\_ N \_\_\_  
If so, was the oil managed as hazardous waste? Y \_\_\_ N \_\_\_  
If not, was the oil exempt? Describe in narrative. N/A \_\_\_ Y \_\_\_ N \_\_\_
4. Is used oil stored only in tanks or containers? (Circle applicable units) Y \_\_\_ N \_\_\_
5. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y \_\_\_ N \_\_\_  
Is secondary containment provided and adequate? Y \_\_\_ N \_\_\_
6. Are containers, and tank trailers in good condition and not leaking? Y \_\_\_ N \_\_\_
7. Are containers provided with secondary containment consisting of walls and floor at a minimum? Y \_\_\_ N \_\_\_  
Is the containment system impervious to oil so as to prevent migration? Y \_\_\_ N \_\_\_
8. Are ASTs, UST tank fill lines and containers labeled "used oil"? Y \_\_\_ N \_\_\_
9. Are used oil filters stored more than 10 days?  
If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A \_\_\_ Y \_\_\_ N \_\_\_
10. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y \_\_\_ N \_\_\_

*ERT  
- IS a  
Process  
- oil  
Added  
✓/H!*



USED OIL PROCESSOR CHECKLIST

Facility Name: Environmental Recovery, Inc Date: 6/27/96  
Facility Representative: Tim Rudolph Facility ID: FLD 092718576  
Inspector: Fellaborn Registration # \_\_\_\_\_

**40 CFR 279 Subpart F -- Processor Standards**

1. Is the facility exempt under any of the following? (279.50(a)) Y \_\_\_ N X  
Transporter or burner processing incidental to normal course of operations? Y \_\_\_ N \_\_\_  
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y X N \_\_\_
3. Is the processor Registered? (62-710.500(1)(b)) Y X N \_\_\_
4. Does the processor have a general permit? 62-710.800(1)) Y X N \_\_\_
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y X N \_\_\_

**Oil Filter Processing Standards-- 62-710.850 F.A.C.**

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y X N \_\_\_  
Is the facility a registered used oil filter processor? (62-710.850) Y X N \_\_\_
2. Are the filters stored in above ground containers which are: (62-710.850(5))  
In good condition? Y \_\_\_ N none on site  
Closed or otherwise protected from weather? Y \_\_\_ N \_\_\_  
Labeled "Used Oil Filters"? Y \_\_\_ N \_\_\_  
Stored on an oil impervious surface? Y \_\_\_ N \_\_\_
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))  
Destination or end use of the processed filters? Y \_\_\_ N \_\_\_  
Name and street address of each destination or end user? Y \_\_\_ N \_\_\_  
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y \_\_\_ N \_\_\_
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y Tally

*none on site*  
↓  
*Did not review*  
↓



**Oil Management Standards - 279.54**

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y X N \_\_\_\_\_
2. If the facility has tanks, do they comply with 62-761 and 62-762 F. A. C. rules?  
 (Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y X N \_\_\_\_\_  
 Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs ? Applies to all ASTs regardless of size per 279.54(d & e) Y X N \_\_\_\_\_
3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y X N \_\_\_\_\_
4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y X N \_\_\_\_\_  
 Is the containment system impervious to oil so as to prevent migration? Y maybe N \_\_\_\_\_
5. Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y not N \_\_\_\_\_
6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y will N \_\_\_\_\_

**General Facility Standards - 279.52**

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y X N \_\_\_\_\_
2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?(279.52(a)) Y X N \_\_\_\_\_
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y X N \_\_\_\_\_  
 Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y X N \_\_\_\_\_
4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y X N \_\_\_\_\_  
*exting, absent*
5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y X N \_\_\_\_\_
6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y X N \_\_\_\_\_
7. Is the emergency equipment inspected and tested periodically?  
 Frequency? as needed Y X N \_\_\_\_\_

Facility : \_\_\_\_\_  
Date: \_\_\_\_\_

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y 10/1 N \_\_\_\_\_
9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
- Fire Department: \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Police: \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Hospital: \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Emergency Response Contractor: \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
10. If not, has the facility attempted to do so and is the refusal documented? Y \_\_\_\_\_ N \_\_\_\_\_

*Did not review*

**Contingency Plans and Emergency Response – 279.52(b)**

1. Does the facility have a contingency plan? Y X N \_\_\_\_\_
2. Is it at the facility and easily available? Y X N \_\_\_\_\_
3. Does the plan include:
- Fire Response Procedure: (compare to 279.52(b)(6)) N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Spill Response Procedures: " N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Explosion Response Procedures: " N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Instructions for handling contaminated materials & residues Y \_\_\_\_\_ N \_\_\_\_\_
- A description of arrangements with local authorities: N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Emergency Coordinators: (Name) \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
- Addresses and telephone numbers of Emergency Coordinators: Y \_\_\_\_\_ N \_\_\_\_\_
- Emergency equipment list: Y \_\_\_\_\_ N \_\_\_\_\_
- Specifications and capabilities of emergency equipment: Y \_\_\_\_\_ N \_\_\_\_\_
- Locations of emergency equipment: Y \_\_\_\_\_ N \_\_\_\_\_
- An evacuation plan and routes: Y \_\_\_\_\_ N \_\_\_\_\_
- Evacuation/alarm signals: Y \_\_\_\_\_ N \_\_\_\_\_
- External reporting procedures: Y \_\_\_\_\_ N \_\_\_\_\_
- Internal recordkeeping requirements: Y \_\_\_\_\_ N \_\_\_\_\_
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y \_\_\_\_\_ N \_\_\_\_\_
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y \_\_\_\_\_ N \_\_\_\_\_
6. Is the emergency coordinator authorized to commit funds for incident response? Y \_\_\_\_\_ N \_\_\_\_\_
7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y \_\_\_\_\_ N \_\_\_\_\_
9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y \_\_\_\_\_ N \_\_\_\_\_

*Did not review*

Rebuttable Presumption and Analysis Plan – 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y X N \_\_\_\_\_
2. Is the 1,000 ppm halogen determination made by testing? Y \_\_\_\_\_ N \_\_\_\_\_
  - If so, does the analysis plan cover: (279.55(a)(2))
  - Sampling methods? Y \_\_\_\_\_ N \_\_\_\_\_
  - Frequency of sampling? Y \_\_\_\_\_ N \_\_\_\_\_
  - Analytical Methods? Y \_\_\_\_\_ N \_\_\_\_\_
  - Is the 1,000 ppm halogen determination made by process knowledge? Y \_\_\_\_\_ N \_\_\_\_\_
    - If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y \_\_\_\_\_ N \_\_\_\_\_
3. Have any analyses showed exceedances of the 1,000 ppm level? Y \_\_\_\_\_ N \_\_\_\_\_
  - If so, was the oil managed as hazardous waste? Y \_\_\_\_\_ N \_\_\_\_\_
  - If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_
4. Is the used oil fuel specification determination made by testing?
  - If so, does the analysis plan cover: (279.55(b)(2))
  - Sampling methods? Y \_\_\_\_\_ N \_\_\_\_\_
  - Whether the oil will be tested before or after processing? Y \_\_\_\_\_ N \_\_\_\_\_
  - Frequency of sampling? Y \_\_\_\_\_ N \_\_\_\_\_
  - Analytical Methods? Y \_\_\_\_\_ N \_\_\_\_\_
  - Is the used oil fuel specification determination made by process knowledge? Y \_\_\_\_\_ N \_\_\_\_\_
    - If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y \_\_\_\_\_ N \_\_\_\_\_
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A \_\_\_\_\_ Y X N X
  - If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A \_\_\_\_\_ Y X N \_\_\_\_\_
6. Are test records or copies of records providing basis for determinations kept for 3 years? Y X N \_\_\_\_\_

*Did not refile with plan*



*TECP Benzene metal*

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

Recordkeeping and Reporting – 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y _____	N _____
EPA ID # of oil provider (if applicable)?	Y _____	N _____
Name & Address of the transporter delivering the oil to the facility?	Y _____	N _____
EPA ID # of the transporter delivering the oil	Y _____	N _____
Quantity of oil shipped?	Y _____	N _____
Type of oil received (62-710.510(1)(c))	Y _____	N _____
Date of shipment?	Y _____	N _____

*Did not review records*

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y _____	N _____
EPA ID # of receiving facility?	Y _____	N _____
Name & Address of transporter delivering the oil?	Y _____	N _____
EPA ID # of transporter?	Y _____	N _____
Quantity of oil delivered?	Y _____	N _____
End Use of the oil? (62-710.510(1)(e))	Y _____	N _____
Date of delivery?	Y _____	N _____

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y \_\_\_\_\_ N \_\_\_\_\_

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y \_\_\_\_\_ N \_\_\_\_\_

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y \_\_\_\_\_ N \_\_\_\_\_

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y \_\_\_\_\_ N \_\_\_\_\_

Closure – 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y \_\_\_\_\_ N \_\_\_\_\_

2. Does the plan include procedures for removing containers of oil and residues?

Y \_\_\_\_\_ N \_\_\_\_\_

Cleaning and decontaminating tanks and ancillary equipment?

Y \_\_\_\_\_ N \_\_\_\_\_

Removing contaminated soils?

Y \_\_\_\_\_ N \_\_\_\_\_

Eliminating the need for further maintenance?

Y \_\_\_\_\_ N \_\_\_\_\_

*Did not review*

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

**USED OIL MARKETER CHECKLIST**

Facility Name: Environmental Recovery, Inc. Date: 6/27/96  
 Facility Representative: Tim Rudolph Facility ID #: FLID 092718576  
 Inspector: Pellabaum Registration #: \_\_\_\_\_

**40 CFR 279 Subpart H -- Marketer Standards**

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y X N \_\_\_\_\_

Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y \_\_\_\_\_ N \_\_\_\_\_

2. Check other Subparts the marketer complys with. (Must comply with at least one and have EPA ID #)

X C - Generator    X E - Transporter    X F - Processor    \_\_\_\_\_ G - Burner

3. Is the facility registered? (62-710.500(1)(c)) Y X N \_\_\_\_\_

4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) Y X N \_\_\_\_\_

And approved Industrial Furnaces or Boilers(279.71(b)) Y X N \_\_\_\_\_

5. Does the marketer claim the used oil meets the specification by analysis? Y \_\_\_\_\_ N \_\_\_\_\_

Or by obtaining copies of generator performed analyses? (279.72(a)) Y \_\_\_\_\_ N \_\_\_\_\_

6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75)

Has notified EPA of its used oil management activities? Y \_\_\_\_\_ N \_\_\_\_\_

Will only burn off spec oil in an approved device? Y \_\_\_\_\_ N \_\_\_\_\_

7. Do Off specification oil delivery records include: (279.74(a))

Name & Address of transporter delivering oil? Y \_\_\_\_\_ N \_\_\_\_\_

EPA ID # of transporter? Y \_\_\_\_\_ N \_\_\_\_\_

Name & Address of receiving burner? Y \_\_\_\_\_ N \_\_\_\_\_

EPA ID # of receiving burner? Y \_\_\_\_\_ N \_\_\_\_\_

Quantity of oil shipped? Y \_\_\_\_\_ N \_\_\_\_\_

Date of shipment? Y \_\_\_\_\_ N \_\_\_\_\_

8. Do on specification oil delivery records include: (279.74(b))

Name & Address of receiving facility? Y \_\_\_\_\_ N \_\_\_\_\_

Cross reference to analysis or other information used to determine that the oil meets the specification? Y \_\_\_\_\_ N \_\_\_\_\_

Quantity of oil shipped? Y \_\_\_\_\_ N \_\_\_\_\_

Date of shipment? Y \_\_\_\_\_ N \_\_\_\_\_

9. Does the marketer keep copies of records for three years? (279.72(b)) Y will N \_\_\_\_\_

10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y will N \_\_\_\_\_

11. Does the facility submit annual reports by March 1? Y Tally N \_\_\_\_\_

*did not receive separate*