



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

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**FACILITY INFORMATION:**

**Facility Name:** Clean Fuels Of Florida Inc

**On-Site Inspection Start Date:** 12/06/2011

**On-Site Inspection End Date:** 12/06/2011

**ME ID#:** 55537

**EPA ID#:** FLD984171256

**Facility Street Address:** 2635 NE 4th Ave, Pompano Beach, Florida 33064-5405

**Contact Mailing Address:** 2635 NE 4th Ave, Pompano Beach, Florida 33064-5405

**County Name:** Broward

**Contact Phone:** (954) 791-9588

**NOTIFIED AS:**

SQG (100-1000 kg/month)

Transporter

**INSPECTION TYPE:**

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Universal Waste Transporter facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Roger E. Carman, Inspector

**Other Participants:** Steve Becker, Operations Manager; D. Barry Fernandez, President

**LATITUDE / LONGITUDE:** Lat 26° 15' 49.4262" / Long 80° 6' 58.539"

**SIC CODE:** 4212 - Trans. & utilities - local trucking, without storage

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On December 6, 2011, a representative of the Florida Department of Environmental Protection (DEP), Southeast District Office (SED), conducted a routine hazardous waste, used oil, and universal waste compliance evaluation inspection at Clean Fuels of Florida, Inc. (CFF). CFF was inspected as a Small Quantity Generator (SQG), a hazardous waste transporter and a universal waste transporter and transfer facility.

CFF is registered as a Hazardous Waste Transporter, a Universal Waste (UW) Lamp Transporter, a UW Device Transporter, a UW Lamp Small Quantity Handler (SQH), and a UW Device SQH. CFF has also notified as a SQG; a Large Quantity Handler (LQH) of combined universal wastes; a LQH of Universal Pharmaceutical Waste (UPW); a LQH of acutely hazardous UPW; a transporter of UPW, UW batteries, UW lamps, and UW mercury-containing devices (MCD); and a SQH of MCDs and mercury-containing lamps. CFF no longer transports used oil or used oil filters, but does transport petroleum contact water (PCW).

CFF was formerly located at 1490 NW 65th Avenue in Plantation, Florida. They moved to their current location within an industrial park in Pompano Beach in August of 2005. The facility consists of a storage area for wastes, a parking area for service trucks and equipment, and office areas. The building occupies about 5,000 sq.ft. and is provided with city water and sewer services. CFF employees 10 people at the facility.

**Process Description:**

Fuel Filtering Service

CFF provides in-situ filtering of petroleum fuels stored in tanks to remove water, scale, sediments,

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microbial sludges, and suspended contaminates. The tanks serviced are mainly diesel fuel tanks for backup generators at hospitals. The two field trucks each have a 3-stage filter system and PCW removed from a tank is collected in four 55-gallon drums onboard each truck. The drums of PWC remain on each truck and the PCW is vacuumed from the drums by Jam Environmental and Vacuum Services, LLC, who then transports the PCW to Cliff Berry, Inc. The filter system's cartridge filters are changed about every 2-3 months, accumulated at the facility, and picked up by Jam Environmental. Absorbent pads used by the field staff are also accumulated and picked up by Jam Environmental. The filters and absorbent pads are transported to US Foundry, Inc. in Miami, FL.

#### Universal Waste and Hazardous Waste Services

Universal waste pharmaceuticals are mainly picked up from hospitals and are transported back to the facility. As necessary, the UWP is sorted at the facility to removed trash such as gloves, gowns, cups, etc. CFF personnel sort the UWP within a metal trough table using PPE and tongs. UPW containers are stretch-wrapped to pallets, labeled, and dated. The accumulation dates are the dates CFF receives the UWP. Each pallet of UWP was labeled with the waste codes D001, U010, U026, U035, U058, U059, U089, U150, U206, and U237. The DOT shipping description was: Waste medicine, liquid, flammable, toxic, NOS, 3 (6.1), UN3248, PGII. The inspector observed that the storage area was nearly full and aisle space was limited between rows of pallets. All containers observed appeared to be properly labeled and dated. CFF had numerous pallets containing unused pharmaceutical barium-containing formulations in both powder and suspension forms. These pharmaceuticals were analyzed for heavy metals using the TCLP. The barium TCLP concentration for the powder formulation was 22 mg/L, and the barium TCLP concentration for the suspension formulation was 0.94 mg/L. CFF plans to dispose of the waste barium-containing pharmaceuticals as a nonhazardous waste.

Hazardous waste xylene and formalin solutions are picked up from hospitals and truck-to-truck transferred to Freehold Trucking, who transports the waste to Giant Recovery in South Carolina. Hazardous waste lab packs are picked up and driven directly to PSC Environmental Services (PSC) in Deerfield Beach, FL. PCS then sends them to PSC's TSD facility in Houston, TX. CFF prepares most of the lab packs. No hazardous waste is stored in the facility. CFF also picks up and accumulates UW lamps, batteries and mercury-containing devices and sends them to AERC in West Melbourne, FL.

#### Additional Facility Information

CFF uses a box van trailer in the outside parking area to store equipment and extra containers. No waste materials were observed in the trailer. CFF had numerous unused empty plastic containers stored in the storage area. CFF provides these containers to customers to accumulate UWP. CFF has a small equipment repair area in the storage area. No hazardous waste or used oil is generated in the area. Although CFF does not generate hazardous wastes, CFF maintains a SQG status for the facility.

#### Record Review

Since the UWP is only universal waste while in Florida, CFF uses hazardous waste manifests to ship the UWP as hazardous waste to the Ross Environmental Services, Inc. incinerator near Grafton, Ohio. During the record review, the inspector observed that CFF recently had been sending Land Disposal Restriction (LDR) notification forms, which included signed certifications, to Ross Environmental instead of LDR notifications only. In the past, CFF had been using what appeared to be appropriate LDR notification forms. All other manifests, shipping and receiving records, training records, and emergency response information and equipment observed or reviewed during the inspection appeared to be adequate.

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

#### Checklist Independent Potential Violations and Areas of Concern

Type:	Area Of Concern
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Rule: 268.7(b)(5)

Explanation: Clean Fuels was providing LDR notifications and signed certifications, to Ross Environmental Services, Inc. Since the manifested wastes did not meet the LDR treatment standards, only the notifications should have been sent.

Corrective Action: Provide corrected notifications to Ross Environmental Services, Inc. and also place corrected notifications in Clean Fuels' facility files.

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**Summary of Potential Violations and Areas of Concern:**Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern 268.7(b)(5)		12/06/2011	Clean Fuels was providing LDR notifications and signed certifications, to Ross Environmental Services, Inc. Since the manifested wastes did not meet the LDR treatment standards, only the notifications should have been sent.

**Conclusion:**

Based on the inspection, it appeared CFF had one area of concern related to LDR notification forms sent to Ross Environmental Services, Inc. CFF was given 30 days to correct the LDR notifications, and CFF submitted information to DEP on December 12, 2011, showing that the correct LDR information had been received by Ross Environmental Services, Inc. Since CFF continues to manage PCW, the inspector recommended that CFF re-notify the Department for this activity. CFF notified DEP of this activity on December 12, 2011.

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**Signed:**

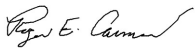
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection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

Roger E. Carman

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

12/8/2011

**DATE**

Steve Becker

**REPRESENTATIVE NAME**

Operations Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Clean Fuels of Florida, Inc.

**ORGANIZATION**

D. Barry Fernandez

**REPRESENTATIVE NAME**

President

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Clean Fuels of Florida, Inc.

**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.