

Aileen M. Mershon

From: Reid, Michael (PERA) [ReidM@miamidade.gov]
Sent: Monday, March 19, 2012 8:41 AM
To: Aileen M. Mershon
Subject: RE: February Derm

Thanks Aileen, I'll see you after lunch today at about 1 PM. Please try to have the waste disposal records for the last three years available.

Thanks for all your help,

Mike Reid

Pollution Control Inspector 1

Miami-Dade County Permitting, Environment and Regulatory Affairs
Overtown Transit Village
701 NW 1st Court, 6th floor, Miami, Florida 33136
(305)372-6714
reidm@miamidade.gov
www.miamidade.gov/pera
"Delivering Excellence Every Day"
Please consider the environment before printing this email.

From: Aileen M. Mershon [mailto:aileen_mershon@kellytractor.com]
Sent: Thursday, March 15, 2012 3:32 PM
To: Reid, Michael (PERA)
Subject: RE: February Derm

Hello Sir - Monday in the PM is good & Wednesday is good any time....

From: Reid, Michael (PERA) [mailto:ReidM@miamidade.gov]
Sent: Wednesday, March 14, 2012 10:45 AM
To: Aileen M. Mershon
Subject: RE: February Derm

Aileen,

I need to stop by next week to visit your facility and conduct a state of Florida DEP RCRA site visit. It sounds more complicated than it is; it mostly involves a record review of your waste disposal. In particular any hazardous waste generated and disposed of for the last three years.
Please let me know if Monday or Wednesday works for you.
Thanks

Mike Reid

Pollution Control Inspector 1

Miami-Dade County Permitting, Environment and Regulatory Affairs
Overtown Transit Village
701 NW 1st Court, 6th floor, Miami, Florida 33136
(305)372-6714

3/19/2012

reidm@miamidade.gov

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"Delivering Excellence Every Day"

Please consider the environment before printing this email.

From: Aileen M. Mershon [mailto:aileen_mershon@kellytractor.com]

Sent: Friday, March 09, 2012 1:32 PM

To: Reid, Michael (PERA)

Subject: February Derm

Hello attached are the waste/manifest for February 2012

Thank You...am

Aileen Mershon

GL Service Department

305.592.5360 ext 1102



COMPLIANCE ASSISTANCE VISIT (CAV) AREAS OF CONCERN

Facility Name: Kelly Tractor Company
Address: 8255 NW 58th St
Current EPA ID #: FLD 981 925 811
Generator Status: SLG

Date: 3/19/12
PERA Permit #: FW-283
PERA Inspector: Reid M
PERA Division: I.W.

An inspection was conducted at your facility on the date listed above, under the authority of Section 403.091 and Chapter 403, Part IV of the Florida Statutes (F.S.). This inspection was designed to determine your facility's compliance with applicable Florida law regarding solid and hazardous waste management. Relevant provisions of Title 40 Code of Federal Regulations (CFR) 260-271 and 279 have been adopted in Chapters 62-710, 62-737 and 62-730 of the Florida Administrative Code (FAC). During the inspection, the following potential items of non-compliance were identified by the inspector. **Please note: this is not a formal enforcement action and may not be a complete listing of all items of non-compliance which exist at the time of inspection.**

GENERAL REQUIREMENTS:

- ☐ Failure to ensure delivery of HW to proper HW facility 40 CFR §261.15 (RF)
- ☒ Failure to provide hazardous waste determination 40 CFR §262.11 (RD)
- ☐ Facility exceeds 90/180 day time limit 40 CFR §262.34 (RT)
- ☐ Failure to notify as generator 40 CFR §262.12 (RN)
- ☐ Failure to use a manifest or reclamation agreement 40 CFR §262.20 (RM)
- ☐ Improper disposal of mercury containing devices §62-737.300(1) FAC (RH)
- ☐ Failure to provide personal training 40 CFR §265.16, 262.34 (RP)
- ☐ Evidence of release(s) of 40 CFR §262.34(d) (RR)

CONTAINER MANAGEMENT:

- ☐ Unlabeled containers 40 CFR §262.34(a) (3) (CL)
- ☒ Undated containers 40 CFR §262.34(a) (2) (FD)
- ☐ Containers not in good condition (leaking/bulging) 40 CFR §265.171 (CB)
- ☐ Open containers 40 CFR §265.173 (CO)
- ☐ Inadequate aisle space §62-730.160 FAC (CA)

STORAGE TANK SECONDARY CONTAINMENT

- ☐ Drain valves open §62-671.700 (3) (a) (3) FAC (SV)
- ☐ Incomplete containment structure §62-671.700 (3) (e) FAC (SC)

FACILITY RECORD KEEPING:

- ☐ Manifests 40 CFR §262.40, §262.44 (FM)
- ☐ Training records 40 CFR §262.34d (5) (iii) (CT)
- ☒ Contingency plan 40 CFR §262.34(d) (5) (FC)
- ☐ Weekly inspect records §62-730.160(6) FAC (FW)
- ☐ Information not posted by phone 40 CFR §262.34(d) (4) (FI)
- ☐ Authorities not notified 40 CFR §262.34(d) (5) (FA)
- ☐ Failure to maintain disposal records §62-730.030 FAC (FB)
- ☐ Failure to label UW lamp containers §62-737.400(5) FAC (FE)

USED OIL/FILTER REQUIREMENTS:

- ☐ Failure to label oil containers §279.22(c) (OC)
- ☐ Oil containers in poor condition §62-710.401(6) FAC (OA)
- ☐ Oil containers without secondary containment §62-710.401(6) FAC (OE)
- ☐ Failure to respond to releases §279.22(d) (OR)
- ☐ Failure to document used oil disposal 40 CFR §279.10 (OD)
- ☐ Failure to manage used oil filter §62-710.850(1) FAC (OI)

OTHER RULES:

- ☐ Secondary Containment Dry Cleaning Statute §376.3078(7) (a) & (b) FS (SD)
- ☐ Discharge of pollutant §403.161, FS (SP)
- ☐ Exceeds Tire Storage §62-711.300 FAC (ST)
- ☐ Wrong address or incorrect EPA# 40 CFR §262.12 RN
- ☐ Satellite Accumulation issues 40 CFR §262.34(c) (1) (CS)
- ☐ Other (OO)



COMPLIANCE ASSISTANCE VISIT (CAV) AREAS OF CONCERN – PAGE 2

Facility Name: Kelly Tractor
Address: 8255 NW 58 St
Current EPA ID #: FLD 981 925 511
Generator Status: SLB

Date: 3/14/12
PERA Permit #: FW-283
PERA Inspector: Reid M
PERA Division: I.W.

An inspection was conducted at your facility on the date listed above, under the authority of Section 403.091 and Chapter 403, Part IV of the Florida Statutes (F.S.). This inspection was designed to determine your facility's compliance with applicable Florida law regarding solid and hazardous waste management. Relevant provisions of Title 40 Code of Federal Regulations (CFR) 260-271 and 279 have been adopted in Chapters 62-710, 62-737 and 62-730 of the Florida Administrative Code (FAC). During the inspection, the following potential items of non-compliance were identified by the inspector. **Please note: this is not a formal enforcement action and may not be a complete listing of all items of non-compliance which exist at the time of inspection.**

ITEMS REQUESTED, CORRECTIVE ACTIONS, AND INSPECTOR COMMENTS:

- Spray booth filters not accounted for in waste stream
- Solid waste not dated, Parts washer waste not dated
- Emergency Contact Ph # for EHS officer not posted

The owner/operator is hereby requested to correct all non-complaint issues. A written description of said corrective actions must be mailed to the attention of the inspector at the address listed above or emailed to Reid M @miamidade.gov within (30) days of receipt of this Notice. Failure to correct the non-compliance item(s) will result in the Florida Department of Environmental Protection (FDEP) being notified. Be advised that FDEP **may** take enforcement action if non-compliance continues. If you need further assistance please contact the inspector at the phone number listed below.

DATE of Notice: 3/14/12
Operator Signature: Mike Isorn
Received by: Mike Isorn, Safety +
Print Name & Title: Env. MGR

Inspector Phone Number: (305) 372-6714
Name (print): M. Reid
Signature: [Signature]

Call (305) 603-2644