



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

FACILITY INFORMATION:

Facility Name: Environmental Management Conservation Oil Corp
On-Site Inspection Start Date: 08/26/2014 **On-Site Inspection End Date:** 08/26/2014
ME ID#: 56326 **EPA ID#:** FLR000000166
Facility Street Address: 8470 NW 68th St, Miami, Florida 33166-2661
Contact Mailing Address: 8470 NW 68th St, Miami, Florida 33166-2661
County Name: Miami-Dade **Contact Phone:** (305) 477-7497

NOTIFIED AS:

CESQG (<100 kg/month)
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility
Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Magdalena Gierczak, Inspector
Other Participants: Maria Leon, President

LATITUDE / LONGITUDE: Lat 25° 50' 4.6497" / Long 80° 20' 7.5499"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Environmental Management Conservation Oil Corporation (EMC) is a used oil transporter/transfer facility, hazardous waste transporter, and a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. EMC has been at this location since 1994 and currently employs 15 people. The facility is approximately 38,000 sq ft and is on public utilities.

Property is currently owned by MEL PROPERTY INC.

INSPECTION HISTORY:

- 4/16/1997 - Legacy Site Inspection
- 3/22/2000 - Legacy Site Inspection
- 11/15/2002 - Compliance Evaluation Inspection
- 1/13/2004 - Compliance Evaluation Inspection
- 5/10/2005 - Legacy Site Inspection
- 5/13/2010 - Site Inspection
- 6/5/2012 - Site Inspection

VIOLATION HISTORY:

- 40 CFR 262.11 - observed on 4/16/1997; corrected by 12/16/1997 - Hazardous waste determination.

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- 40 CFR 279.22 - observed on 4/16/1997; corrected by 12/9/1997 - Used oil storage.
- 40 CFR 279.45 - observed on 4/16/1997; corrected by 2/1/1998 - Used oil storage at transfer facilities.
- FAC 62-710.850 - observed on 4/16/1997; corrected by 12/16/1997 - Management of Used Oil Filters.
- FAC 62-160.300(6) - observed on 3/22/2000; corrected by 4/12/2000 - Certifications.
- 40 CFR 279.22 - observed on 3/22/2000; corrected by 4/6/2000 - Used oil storage.
- 40 CFR 262.11 - observed on 3/22/2000; corrected by 4/12/2000 - Hazardous waste determination.
- FAC 62-730.171(3) - observed on 5/10/2005; corrected by 10/3/2005 - Hazardous waste storage.
- FAC 62-730.171(2)(e) - observed on 5/10/2005; corrected by 10/3/2005 - Hazardous waste records.
- 40 CFR 264.1 - observed on 5/10/2005; corrected by 10/3/2005 - Purpose, scope and applicability.
- FAC 62-710.600(2)(c) - observed on 8/16/2006; corrected by 9/1/2006 - Training records.
- FAC 62-710.510(1) - observed on 8/16/2006; corrected by 9/1/2006 - Record keeping
- 40 CFR 279.52(b)(2) - observed on 6/5/2012; corrected by 6/5/2012 - Content of contingency plan.

Process Description:

Facility operations include:

- transport of hazardous waste from the customer's facility directly to Triumvirate in Fort Lauderdale.
- transport of used oil, used oil filters, absorbents, and oily water from customers into their facility for transfer into tankers and roll offs for final shipments to the receiving facilities.
- + used oil is transported to either Noble Oil or H & J Asphalt
- + absorbents are sent to Triumvirate
- + oily water is taken to Cliff Berry
- + used oil filters were initially transported to US Foundry. Between January 2012 and February 2013 used oil filters were treated at an onsite treatment facility, McKenzie Environmental (EPA ID#FLR000182071). McKenzie Environmental closed its operations at this location in 2013 and EMC reverted to transporting used oil filters to US Foundry.

EMC stores its used oil in an 8,000 gallon tank in secondary containment and in 10,000 gal double-walled tank transports located in the parking area.

EMC has a maintenance shop that generates used oil and used oil filters. No parts washing solvent was observed used and/or generated by the facility at time of inspection.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.43(a)
Question Number:	29.60
Question:	Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID numbers?
Explanation:	Operator records revealed delivery of received used oil to unregistered burner (H&J Asphalt).
Corrective Action:	Cease delivery of used oil to unregistered used oil burner. Provide a written

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response to the Department describing the facility's plan to ensure only registered end users receive used oil. Please provide any applicable supporting documentation that demonstrates the facility has made arrangements to deliver used oil to a registered burner or processor (service contract, delivery records, etc.).

Conclusion:

Records reviewed during the inspection included: training records for the employees, sampling of the oil picked up and sent out, manifests for the hazardous waste and used oil, proof of insurance, and a copy of their contingency plan.

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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.

Magdalena Gierczak

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

8/26/2014

DATE**Supervisor:** Karen Kantor

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.