FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTH DISTRICT
P.O. BOX 2549
FORT MYERS, FL 33902-2549
SouthDistrict@dep.state.fl.us

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

April 23, 2015

VIA ELECTRONIC MAIL

Mr. Cory Baxter
Mobile Impact Services LLC
407 West Lake Drive
Sarasota, FL 34232
mobileimpactservices@gmail.com

Re: Sarasota County – HW
Compliance Assistance Offer
Mobile Impact Services LLC
Facility ID No. FLR000203158

Dear Mr. Baxter:

Department personnel conducted a compliance inspection of the above-referenced facility on March 25, 2015. Based on the information provided following the inspection the non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Laura Comer at (239) 344-5626 or via e-mail at: Laura.Comer@dep.state.fl.us.

Sincerely,

Elizabeth Gillen
Environmental Administrator
Compliance Assurance Program
South District
Florida Department of Environmental Protection

Enclosure: Inspection Report

LG/LC/se

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Mobile Impact Services LLC

On-Site Inspection Start Date: 03/25/2015 **On-Site Inspection End Date:** 03/25/2015

ME ID#: 110098 **EPA ID#:** FLR000203158

Facility Street Address: 407 W Lake Dr, Sarasota, Florida 34232-1948

Contact Mailing Address: 407 W Lake Drive, Sarasota, Florida 34232

County Name: Sarasota **Contact Phone:** (941) 952-8945

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Laura M. Comer, Environmental Specialist III

Other Participants: Rich Miller, Environmental Specialist II; Cory Baxter, Owner

LATITUDE / LONGITUDE: Lat 27° 19' 57.668" / Long 82° 28' 47.6511"

SIC CODE: 7699 - Services - repair services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Mobile Impact Services first registered as a used oil transporter in October 2013 and has completed annual registration and annual reporting for 2014 and 2015. The registration form is posted at the facility as well as on the vehicle. Mobile Impact Services always transports <55 gallons of used oil and transports <500 gallons of used oil annually over public highways and is therefore not subject to the Certification Program under section 62-710.600 Florida Administrative Code.

A compliance evaluation inspection was conducted at Mobile Impact Services on March 25, 2015. This is the first Department inspection of this facility.

Process Description:

Mobile Impact Services operates out of a garage at a residential property owned by Corey and Shona Baxter. Mobile Impact Services maintains and repairs hydraulic lifts. Used hydraulic oil is generated when the hydraulic cylinders are disassembled. The majority of hydraulic cylinders serviced are transported in tact (oil contained within the sealed cylinder). Used hydraulic oil is drained and placed directly into two closed 55-gallon drums labeled "used oil" which are stored inside a garage on a secondary containment pallet calculated to have only a 36 gallon capacity. The pallet is located near a closed garage door and is also labeled "used oil". On April 8th, Mr. Baxter provided a photo of new oil containment with a capacity of 66 gallons. A container of absorbent material and absorbent pads are available to respond to spills.

Mr. Baxter does occasionally service large hydraulic lifts which require draining the used hydraulic oil and transporting it back to his residence. He never transports more than 55-gallons at any one time and transports less than 500 gallons annually over public highways. Oil collected in the field is placed into a closed 5-gallon plastic container labeled "used oil". Additional containers are stored on the truck if needed. Containers holding used oil are stored inside a metal "job box"

attached to the bed of the Mobile Impact service truck and capable of containing releases from several 5-gallon containers.

A 55-gallon drum of product "Brake Kleen" supplied by Best Line Oil was observed in the garage. According to the Material Safety Data Sheet (MSDS) provided by the manufacturer it is a non-chlorinated brake cleaner which contains 2.5-10% methanol. This material is dispensed with a refillable pressurized spray can while working on hydraulic equipment. Mr. Baxter said the material is used up in process and no wastes are generated from the use of this product.

A sink top parts washer with a 16-gallon drum base was observed outside the garage underneath the house awning. The drum was observed to be dented but not leaking. The metal drum has a plastic bag liner. Chemical 1 Super Purple Clean is used to clean and degrease aluminum parts. According to the MSDS, Super Purple Clean is an aqueous detergent with a pH of 8.7 +/- 2 and is non-hazardous as packaged. Mr. Baxter said he has not yet disposed of any of this material and it is only used occasionally.

The facility keeps a log with the date, client name and volume of oil removed from the hydraulic lifts. Addresses are kept separately. Mr. Baxter reported 388 gallons of used oil were handled in 2014. The log indicates most pickups were less than 5-gallons and the largest was 25-gallons.

Used oil was most recently picked up at the residential address on March 12, 2015. The transporter was Safety-Kleen FLR00053611. Records indicate the following amounts have been removed from Mobile Services:
3/12/15 145 gallons used oil Safety-Kleen
9/2014 91 gallons used oil + 37 gallons oily waste Synergy Recycling
5/20/14 135 gallons used oil Synergy Recycling
12/13/13 70 gallons used oil World Petroleum.

The facility does not conduct halogen screening on the oil removed from hydraulic lifts. The documentation from the transporters picking up the waste from Mobile Impact Services indicated all loads passed halogen screening by the transporter.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. Two 55-gallon drums of used oil are stored on a secondary containment pallet of insufficient volume. Although the drums are stored inside a structure, they are near a closed doorway which would prevent containment within the structure in the event of a release.
Corrective Action:	The facility replaced the secondary containment with a containment pallet capable of holding 66 gallons and provided a photo on April 8th. Corrective action is completed.

PHOTO ATTACHMENTS:

hydraulic lift



Used oil drums and containment



Aqueous Parts Washer



used oil on truck in job box



Conclusion:

Please note that one digit of the EPA identification number was entered incorrectly on the annual registration form received by the Department on February 25, 2015. Please ensure that the correct identification number is used on all facility documents. The correct identification number is FLR000203158.

Best Line Brake-Kleen is ignitable and should the facility need to dispose of any product it would need to manage it as hazardous waste. The facility should be careful not to cross contaminate used oil with enough of this product to render the oil ignitable. Any wastes generated from the use of this product (such as rags) would require a hazardous waste determination prior to disposal.

The facility should use care not to cross-contaminate the aqueous parts cleaner solution with regulated solvents. Used as described (detergent used on aluminum parts) the spent solvent is likely non-hazardous. However, it is the generator's responsibility to make a waste determination prior to disposal. Industrial wastes should not be discharged to a residential septic tank system. It is also recommended that the damaged drum be replaced with a drum in good condition and that the parts washer be stored securely and protected from the weather.

As discussed during the inspection, Sarasota County Hazardous Waste Management with the approval of the Florida Department of Environmental Protection has developed a program called Project Green Sweep. This program has been designed to dispose of small quantities of hazardous and regulated waste generated from conditionally exempt small quantity generators and may also be able to assist you with management of the spent detergent from the parts washer at your facility. To qualify for Project Green Sweep you must submit an application form to Project Green

Sweep. Please contact Sarasota County Environmental Services at (941) 861-1531 for more information and pricing. Additional information and application forms can be found on their website at www.scgov.net/commercialsolidwaste/Pages/ProjectGreenSweep.aspx.

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.

Laura M. Comer	Environmental Specialist III
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	FDEP South
	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.