



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: World Petroleum Corp
On-Site Inspection Start Date: 03/24/2015 **On-Site Inspection End Date:** 03/24/2015
ME ID#: 99878 **EPA ID#:** FLR000167023
Facility Street Address: 10407 US Highway 41 N, Palmetto, Florida 34221-8724
Contact Mailing Address: 3701 SW 47th Ave Ste 101, Davie, Florida 33314
County Name: Manatee **Contact Phone:** (954) 327-0724

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III
Other Participants: Phillip Pierre-Louis, General Manager

LATITUDE / LONGITUDE: Lat 27° 36' 30.2231" / Long 82° 32' 27.9909"

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

TYPE OF OWNERSHIP: Private

Introduction:

World Petroleum Corporation (WPC) was inspected to evaluate its compliance with state and federal used oil regulations. WPC notified the Department of its used oil activities at this location on March 30, 2012. The inspector was accompanied throughout the inspection by Phillip Pierre-Louis, General Manager. The facility was inspected in 2010 when it was operated by Raider Environmental Services, Inc., however, this is the first inspection of WPC at this location.

Process Description:

WPC is a registered and certified used oil and used oil filter transporter. WPC transports used antifreeze, used oil and used oil filters to its processing facility in Ft. Lauderdale, FL. Petroleum contact water is not transported. Filters and antifreeze are transported in drums, and used oil is transported in bulk. Used oil from customers arrives in a vacuum pump truck equipped with a drum box for the filters and / or antifreeze. Used oil and mixtures of used oil and water are each offloaded and stored on site in dedicated 6,000-gallon double-walled, steel aboveground storage tanks (ASTs). Used oil leaves the facility in tanker trucks that are loaded from the ASTs. Drums of antifreeze and used oil filters are stored in a box trailer over a concrete pad, and a spill kit is located nearby. When the trailer is full, it is transported off site. The facility is on Manatee County water and sewer systems and consists of a small office building and a large yard. There is basically one employee, a driver, that is headquartered at this location, although Mr. Pierre-Louis is often at the facility.

During the yard inspection, it was noted that the rear end of the box trailer storing drums of used oil filters was not situated completely over the concrete pad. Examination of the interior of the trailer showed that all the drums inside it were currently over the concrete, but if the trailer were to be filled, this would not be the case. Mr. Pierre-Louis was directed to move the trailer to ensure that the entire contents are located over the pad. On March 30, 2015, the Department received

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documentation that this had been done. It appeared that all drums of used oil filters were being correctly managed while on site. There were no drums of used antifreeze observed during the inspection.

Also stored inside the trailer was a dented drum of "non-regulated semi-solid sludge" from LKQ in Crystal River. The drum was in poor condition and had evidence of seepage near the bottom. Mr. Pierre-Louis was directed to overpack the container or transfer the contents to a more suitable container. He was also asked to provide the analytical report of the material, which he did on March 30, 2015. The report provided indicated that the material is nonhazardous. Mr. Pierre-Louis stated that WPC generally acts as a broker for any material that is found to be hazardous waste, and that the hazardous waste would be disposed of at US ecology (FKA EQ Florida), Tampa, FL.

There were several drums being stored under the trailer, as well. These drums were empty, but one was stored upside down on the drum head, and some staining was apparent on the concrete. This was discussed during the inspection, and Mr. Pierre-Louis indicated he would clean out the area underneath the trailer. He provided documentation of the cleanout to the Department on March 30, 2015.

The two ASTs are both labeled "used oil" and are located on the ground next to an old, concrete containment dike that was already on the property when WPC began operations here. The transfer hoses, etc., are stored within the dike when not in use. The facility has an approximately 80-gallon rolling bin located outside the containment dike. The bin was labeled "used oil filters" but was found to contain used oil and debris. Mr. Pierre-Louis was directed to either move the bin into the dike, or to provide other suitable containment. The container was moved during the inspection.

The facility has a small office building that generates spent fluorescent lamps. At the time of the inspection, there were ten waste lamps observed without labels or containers. Mr. Pierre-Louis was directed to place all universal waste lamps in containers that are normally closed and labeled "universal waste lamps." He provided documentation of corrective action to the Department on April 29, 2015. Spent lamps are recycled by AERC, Melbourne, FL.

The driver, Tony Machado, was present during the inspection, and his truck was examined. The truck was found to contain a halogen detector, and Mr. Machado was familiar with the instrument. There were also spill response materials and other emergency equipment present, along with the required paperwork, including proof of insurance, a copy of the transporter registration/certification, and a copy of the spill response plan.

Records were reviewed, including the contingency plan (2015 revision), required postings (e.g., Storage Tanks Placard, Used Oil Transporter Registration, etc.), acceptance criteria and halogen screening protocols, driver training records, in-bound and out-bound records, the Annual Report for Used Oil and Used Oil Filter Handlers, and proof of insurance (Evanston Insurance - \$1 million/\$5 million). Based on the in-bound and out-bound records, used oil is stored on site for less than 35 days. The only discrepancies noted are as follows.

The facility uses preprinted manifests, and the transporter's EPA ID number listed on the forms was for a closed WPC facility in Punta Gorda (FLR000170761). Additionally, some forms identified the Palmetto location as the designated facility rather than the transporter. After the inspection, the facility provided a corrected form for review. The form now clearly identifies WPC as the transfer facility, not the designated facility, and the EPA ID number is correct. There was one manifest for Fuel Tank Cleaners in Bradenton that did not have the generator's signature, as required. Finally, the driver is not always recording the results of the halogen screening, particularly for mixtures of used oil and water. As discussed during the inspection, mixtures of water and used oil are regulated as used oil, and are therefore subject to the halogen screening requirement. These issues were discussed with the driver, who indicated that in future, all loads would be screened, and a signature would be obtained for every pick up.

New Potential Violations and Areas of Concern:

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Violations

Type: Violation
Rule: 279.44(d)
Explanation: Halogen screening results are not always being recorded, especially for mixtures of used oil and water. (corrected)
Corrective Action: This issue was discussed on site with the driver and the General Manager. The driver will now be recording all screening results, as required.

Type: Violation
Rule: 279.46(a)(2), 279.46(a)(5)(i)
Explanation: The transporter's EPA ID number on acceptance records was for a closed WPC facility in Punta Gorda. Additionally, some forms identified the Palmetto location as the designated facility rather than the transporter. (corrected)
Corrective Action: Additionally, there was one manifest reviewed that did not have a signature on behalf of the generator. (corrected)
After the inspection, the facility provided a corrected form for review. The form now clearly identifies WPC as the transfer facility, not the designated facility, and the EPA ID number is correct.
The driver will now be obtaining a signature from the generator or the generator's representative for each pick up, as required.

Type: Violation
Rule: 62-710.401(6)
Explanation: There was one bin containing used oil that was not provided with secondary containment. (corrected)
Corrective Action: The bin was moved into the containment dike during the inspection.

Conclusion:

Based on the observations made during this inspection, WPC was not in compliance with rules applicable to used oil transporters, but has since returned to compliance.

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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.

Kelly M. Honey
PRINCIPAL INSPECTOR NAME

Environmental Specialist III
PRINCIPAL INSPECTOR TITLE


PRINCIPAL INSPECTOR SIGNATURE

FDEP
ORGANIZATION

4/29/2015
DATE

Supervisor: Beth Knauss

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.