

Winston, Kathy

To: josef@us-lubes.com
Cc: Nilesh Lakhlani
Subject: Inspection at US Lubricants used oil processing facility in Hialeah
Attachments: final inspection_report.pdf

Please find attached your inspection report for the Department's visit to the facility on December 16, 2015. Also, this email serves as a reminder that the facility still owes compliance documents demonstrating that your new employee at this site has received proper training pertinent to his job duties. The Department will need a description of the content of the training and an affidavit signed by the employee that he has received the appropriate training. Please submit the requested compliance documents to the Department within the next 10 calendar days or the Department will be forced to proceed toward enforcement. If you have any questions concerning this email or any other compliance issue, please feel free to contact me at the information supplied below.



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

FACILITY INFORMATION:

Facility Name: US Lubricants LLC

On-Site Inspection Start Date: 12/16/2015

On-Site Inspection End Date: 12/16/2015

ME ID#: 115059

EPA ID#: FLR000213777

Facility Street Address: 7855 W 2nd Ct Bay 2, Hialeah, Florida 33014-4332

Contact Mailing Address: 7855 W 2nd Ct, Hialeah, Florida 33014-4332

County Name: Miami-Dade

Contact Phone: (305) 477-7338

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Jose Fernandez, Owner; Jay Choi, Environmental Specialist

LATITUDE / LONGITUDE: Lat 25° 53' 38.7852" / Long 80° 17' 19.6116"

SIC CODE:

TYPE OF OWNERSHIP: Private

Introduction:

US Lubricants LLC (USL) is a new used oil processing facility. The plant itself is a self-contained unit installed in a single bay of a multi-unit warehouse. The facility is leased from Commercial Group LLC and is connected to city water and sewer. The facility has only two employees as the drivers are employees of USL's used oil transporter, transfer facility and marketer site.

The inspectors visited the facility to see how the final trial runs were going and whether the facility had all the other requirements of a used oil processor in place so as to avoid compliance issues down the line. Once the facility is happy with their product, they will begin sending it out through their long established distribution system for petroleum products. USL's ultimate goal is to be picking up used oil from their established clients and delivering new oil back to these same clients.

Process Description:

As indicated above, USL is using an all-in-one unit made by the Chongqing Zhongneng Oil Purifier Manufacturing Co. Ltd. The machine processes used oil by first centrifuging out any large particulates and then adding acids to make the metals precipitate out. The oil is then run through an oil/water separator and sent to a reactor with clay added to eliminate any gases. Following that, the system has a filter to remove the clay, and then three carbon filters of diminishing mesh sizes used for polishing. At this point, the remaining liquid is run through a filter press and the resultant liquid is the finished product. There is a 275 gallon used oil storage tank sitting inside the containment pan, which is there as feedstock for the system, and it was properly labeled.

Due to processes taking place at this facility the only hazardous waste expected to be generated will be the sludge from the filter press. The facility already has a drum staged on a containment pallet for collection of this wastestream. Besides being prepared for waste collection, the facility has all required and appropriate safety and spill response equipment in place and ready for use.

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The company is only performing some very minor wet chemistry testing onsite: % water, viscosity, and specific gravity. The facility is using Penn Air Labs of Miami to do their on-spec verifications. The new plant operator that was hired to run this system appears to have a good chemistry and used oil management background and should be an asset to keeping the system performing at its' best.

Record Review –

There were no acceptance and delivery information to review but the logs have been created and have all the required information included. They have also already implemented a general facility inspection log. The facility's generation status will probably be that of a Conditionally Exempt Small Quantity Generator; therefore, container inspection logs will not be required. Training records for the new operator were not available. The facility's consultant is working on a training plan, which should be initiated by the end of March. The employee has not been with the company for six months yet and is working under the supervision of the company owner at this time. The facility's active permit, closure plan, and waste analysis plan were not onsite and the Department's approval letter was not posted. The facility received their permit on June 4, 2015, which includes the facility's approved closure and waste analysis plans; these items are on file with the Department, and the facility was advised to make them readily accessible onsite.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	403.727(1)(c)
Explanation:	The facility failed to comply with Part 1, Condition 12 of their permit, which requires that the facility's permit be maintained onsite. Also, the facility's waste analysis plan and closure plan were not onsite, which are violations of 40 CFR 279.55 and 62-710.800(5)(c), respectively. Both of these documents are included in the permit; therefore, having their permit onsite would have met all these requirements.
Corrective Action:	Please provide pictures demonstrating that the facility has posted their approval letter onsite and maintain the subject documents onsite as required by the conditions of the permit and the referenced regulations and statutes.

Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	The facility had one new employee at the processing facility who had not received appropriate training for the job he was performing.
Corrective Action:	Please provide appropriate training for the new operator as it relates his job duties. To demonstrate compliance, please provide the Department with the content of the training and the signature of the employee on a document stating he has received this training.

This new employee was working under the supervision of the owner and six months has not gone by since the person was hired. Also, the facility's consultant is working on a training plan for the facility and the new operator should receive training by the end of March.

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Conclusion:

The facility was not in compliance at the time of the inspection and was asked to provide pictures showing that the permit was onsite and the Department's approval letter was posted. Also, the inspector requested that training records be provided for the plant operator as soon as they are available.

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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.

Kathy R. Winston _____

PRINCIPAL INSPECTOR NAME

Inspector _____

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

3/3/2016 _____

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.