



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

FACILITY INFORMATION:

Facility Name: Diversified Environmental Services Inc

On-Site Inspection Start Date: 02/09/2016

On-Site Inspection End Date: 02/09/2016

ME ID#: 49178

EPA ID#: FLD984183566

Facility Street Address: 1201 N 22nd St # 200, Tampa, Florida 33605-5314

Contact Mailing Address: 1201 N 22nd St, Tampa, Florida 33605-5314

County Name: Hillsborough

Contact Phone: (813) 248-3256

NOTIFIED AS:

Non-Handler

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Gerry McCormick Jr., Vice President; Jamie Arleo, ES III

LATITUDE / LONGITUDE: Lat 27° 57' 22.4678" / Long 82° 26' 0.3581"

SIC CODE: 3999 - Manufacturing - manufacturing industries, nec

TYPE OF OWNERSHIP: Private

Introduction:

Diversified Environmental Services, Inc. ("DES") was inspected in conjunction with its sister company, Diversified Marine Tech, Inc. ("DMT"). Gerry McCormick Jr. provided access and information during the inspections. Both companies are currently registered with the Department as used oil transporters and transfer facilities, but neither has a permit for used oil processing. The companies do not market used oil fuel. All oil is shipped to off site facilities for additional processing and marketing.

DES has offices, parking areas for transportation equipment, a maintenance shop and a centralized wastewater treatment unit that discharges to the City of Tampa's sewer system under a pretreatment permit. DES is a spill response contractor and offers tank and ship cleaning services. DMT operates a ship repair and maintenance business at the Port of Tampa, with a full service wet slip in addition to a dry docking system. The company can also service ships elsewhere in the port and transport waste from the ships to the DMT dock for transfer to shore facilities. The company also conducts some operations in Texas.

Process Description:

DES currently operates nine vacuum trucks, five tankers and five tractors. Two of the vac trucks operate at their Texas location. DES also has eleven frac tanks, plus rental units. DES owns three tugs and a 16,250 barrel capacity double hulled tank barge, the DES 1625 which was built in 1970.

DMT provides ship maintenance services and repairs, and the barge is used to transport oily waste over water. The barge also is used to allow passive gravimetric separation of oil and water. Frac tanks are also staged at DMT for holding oily waste. Oily waste water is transferred to trucks or tankers for transport to the DES facility for treatment. Sewage pumped from ship holding tanks is

Inspection Date: 02/09/2016

taken directly to the City of Tampa's Howard Curran treatment facility for discharge.

DES accepts industrial waste water for pretreatment in a NPDES permitted Centralized Wastewater Treatment Unit that discharges to the City of Tampa's Howard Curran wastewater treatment facility. Since the previous inspection, DES modified their permit to accept all types of industrial waste water (Category D.) The water treatment plant includes six, 10,000 gallon tanks holding tanks for water, which is tested prior to discharge to the POTW. Solids precipitated during treatment are separated from the waste water in a cone bottom tank, and then dewatered in a filter press prior to disposal off site, to Clark Environmental. The solids are tested regularly and are not characteristically hazardous.

Recovered oil is currently being stored in frac tanks on site. Mr. McCormick said that oil with excessive water is sometimes transported back to the barge, where it is stored to allow additional gravimetric separation. One frac tank was labeled "DES Oil" and was marked with a date of August 4, 2014. Five additional frac tanks were not labeled "used oil." Mr. McCormick estimated that the contents were 80 to 85% oil, but the water content needed to be reduced to between 1% to 8% to make the oil marketable. Due to market conditions, and inability to meet water content limits, DES and DMT did not ship any recovered oil to an off site processor between September 14, 2015 and the date of this inspection.

Oil transfer records between DMT and DES were on file. The records included the EPA identification numbers of both companies. All records included a notation "halogens less than 1,000 ppm." Three records for oil transferred from DES to DMT did not include a signature. The most recent record on file was from September 6, 2015.

Recovered oil is brokered by Sunrise Environmental. In 2015, off specification used oil was marketed to Oil Recovery, Inc. in Camilla Ga, GAR000054480. One load was rejected on April 9, 2015 and returned to DES due to a water content of 35%. It was not rejected due to excess halogens. A shipping record from August 13, 2015 did not include Diversified's EPA identification number. Earlier in the year, oil was also shipped to Georgia Petroleum, GAD981222433 as "non hazardous used oil." The most recent disposal record on file to any other transporter or processor was from September 14, 2015.

Oily solids such as engine room muck and contaminated absorbents are stored in containers and are currently being disposed of through Clark Environmental in Mulberry. About 50 - 55 gallon drums of this material were stored within the DES maintenance building. Plastic bags of oily solids were also stored in this area. Some oil contaminated boots and buckets were being held for cleaning in drums labeled "used oil." These were located on a loading dock on the east end of the maintenance/office building.

The tanker parking area also held several unlabeled containers. One was closed and held muck with a small amount of floating oil, another blue poly drum was open, with a small amount of oily residue and a white plastic bucket. Another bucket with oily residue was located adjacent to a tanker. These appeared to be staged to collect drips from hoses used for loading and unloading. Two additional drums labeled "non hazardous waste" and "petroleum contact water" were stored next to the building holding the water treatment plant. These contained oily solids separated from the waste water during transfer. The drums were labeled as having been generated off site, however Mr. McCormick indicated that the drums had been emptied, and were being re-used without removing the original labels.

A small laboratory is adjacent to the water treatment plant. The tests are limited to pH, chloride content and percent water by Dexsil Hydrosout testing. No specification testing is conducted, and quarterly waste water samples collected for Clean Water Act compliance are analyzed by a certified lab. A corner of the lab held about a dozen fluorescent lamps that appeared to be old and dirty, however it could not be determined whether these were spent lamps or unused lamps.

New Potential Violations and Areas of Concern:

Violations

Inspection Date: 02/09/2016

Type: Violation
Rule: 279.45(d)
Explanation: Used oil was being stored in frac tanks and other containers that were not provided with secondary containment.
Corrective Action: Used oil stored at transfer facilities must be provided with an impervious secondary containment system consisting of, at a minimum, dikes, berms or retaining walls and a floor covering the area within the berms.

Type: Violation
Rule: 279.45(g)(1)
Explanation: Used oil frac tanks and other containers were not labeled with the words "used oil."
Corrective Action: All used oil containers and tanks at used oil transfer facilities must be clearly labeled or marked with the words "used oil."

Type: Violation
Rule: 279.46(a)(2), 279.46(a)(5)(i)
Explanation: Used oil acceptance records from DMT did not always include a signature, dated upon receipt. Records of transfers to off site processors did not always include the facility identification number of DES.
Corrective Action: Ensure that all used oil acceptance and delivery records include the EPA identification numbers of the oil provider, and the signature of the oil provider, dated upon receipt.

Type: Violation
Rule: 62-710.800(2)
Explanation: DES and DMT have stored used oil for more than 35 days without a used oil processing permit and without complying with the standards applicable to used oil processors.
Corrective Action: DES and/or DMT must submit a complete application for a used oil processing facility permit. Used oil may not be stored for more than 35 days without a permit, and without complying with applicable standards.

Conclusion:

DES and DMT are not operating in compliance with regulations applicable to used oil transfer facilities. Used oil has been stored for more than 35 days. Florida requires facilities that hold used oil more than 35 days to obtain a used oil processor permit. In addition, used oil is being stored in frac tanks that are not labeled with the words "used oil" and are not provided with secondary containment.

Inspection Date: 02/09/2016

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.

Elizabeth Knauss

PRINCIPAL INSPECTOR NAME

Environmental Consultant

PRINCIPAL INSPECTOR TITLE*E. Knauss***PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

ORGANIZATION

4/8/2016

DATE**Supervisor:** Beth Knauss**Inspection Approval Date:** 04/13/2016

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.