

From: Blandin, Norva
To: ["Rocio Rojas"; "david@ecodbr.com"](#)
Cc: [Kantor, Karen E.](#); [Winston, Kathy](#); [Wakefield, Jessica](#)
Subject: FDEP Complaint Inspection - Eco Services DBR EPA ID FLR000197939
Date: Monday, October 31, 2016 11:04:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Figures.pdf](#)
[3911 S ST R 7 Property Map.pdf](#)
Importance: High

Good afternoon Mrs. Rojas/David Batista:

The Department performed a site inspection responding to a complaint received on October 27, 2016 regardless to a discharge of used oil to the ground (leaking used oil) from a tank truck in your facility location (in your case, the space that you rent) in the industrial parking lot located at 3923 S State Road 7, Davie, Florida. The Department inspectors findings are described below:

1. A total of thirty three (34)-55 gallon drums were observed at your designated area inside the yard (see attachment for details)
 - a. Six (6) -55 gallon drums were observed that contain Used oil filters; two of the six were open. 2 of them were labeled as used oil filters, generator name The School Board of Broward County – Document No. NHWM095842.
 - b. Two (2)-55 gallon drum of unknown material were observed. Appeared to be full and closed with a clamp ring.
 - c. Three (3)- 55 gallon drums were emptied.
 - d. One (1)-55 gallons appeared to be partial empty with paint residue (open)
 - e. Two (2)-55 gallons drum appeared to contain oily water.
 - f. Fourteen (14)- 55 gallons drum of unknown material were observed rusty, closed and unlabeled. ??????. One of them, was open and appeared to be oily water.**
 - g. Two (2)-55 gallon drums of oily rags were observed open.
 - h. Three (3)-55 gallons drum of **unknown material** were observed closed and located behind the tank trunk of Eco services. One of them was labeled as concrete curing compound.
 - i. One (1)-55 gallons drum of used oil filters, labeled and closed under the name of U.S., Lubricants. And Eco Services DBR.

Also, the inspectors **observed 3 tanks of 250 gallons (closed)** that were labeled as cooking oil from the Majesty of the Seas. As per our phone conversation, these tanks were given to Eco Services emptied and Eco Services used for holding water for their employees. **Please provide a letter from Triumvirate stating your explanation.**

2. The inspectors observed many releases of used oil (discharges) to the ground (soil impacted) nearby to the location of the tank truck and the containers above described. According to our phone conversation, the tank truck was leaking used oil and was repaired. **Please provide a copy of the tank truck reparation receipt.**

Based on our observations, the Department request the following **corrective actions and documentation before November 2:**

1. Provide a copy of your manifests (disposal records) for the last three years including acceptance and delivery records including the last shipment before October 27, 2016.
2. Provide copy of the proper disposal (recycling) of the used oil filters/oily water/oily rags observed at your site and photographs.
3. For those drums are described as unknown, the facility need to made a proper waste determination/or waste profile of these drums to perform a proper disposal.
4. For the contamination to the ground based on the release of used oil, facility need to clean up, OR hire an environmental contractor for cleanup and sampling for any extent contamination. Please copy of the proper disposal of the contaminated soil (with used oil) and if the quantity exceed more than 165 gallons (equivalent to 3-55 gallons drums), a soil sampling will be required. Also, as per new rule requirement for notice incidents or discovery of pollution, (directed by the Governor), facility will need to notify this incident (used oil spill) at this location and follow the instructions described in this link <http://www.dep.state.fl.us/pollutionnotice/>. Please, send us a copy of this notice.
5. Provide copy of any documentation for the rejected shipment with the dates and quantities and justification from the designated facility.

As you know, based on your facility permit, your facility is not allowed to held used oil or perform any used oil activities for more than 24 hours. Unfortunately, your facility was operating as a Transfer facility according to the 40 CFR part 279.45 "used oil transfer facility are transportation related facilities including loading docks, parking areas, storage areas and other area where shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days. Transfer facilities that store used oil for more than 35 days are subject to regulation under subpart F."

Any further actions, the Department will let you know how to proceed.

The Department inspectors will be at your location tomorrow performing a follow up site visit (near to 12:30pm-1:00pm).

Cordially,

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