

**From:** [Kantor, Karen E.](#)  
**To:** [Blandin, Norva](#)  
**Subject:** FW: Request for Case Classification Review - Eco Services DBR Inc. EPA ID FLR000197939  
**Date:** Monday, December 12, 2016 2:56:02 PM  
**Attachments:** [Harm Ranking Worksheet ECO Services DBR Inc FLR000197939.docx](#)  
[image004.png](#)  
[image006.png](#)  
[image008.png](#)  
[image010.png](#)  
[image012.png](#)  
[image014.png](#)  
[image016.png](#)  
[image019.png](#)  
[image021.png](#)  
[inspection\\_report Eco Services DBR FLR000197939 10-27-16.pdf](#)  
[Harm ranking Computation Worksheet Eco Services DBR EPA ID FLR000197939.....xlsx](#)  
[Draft Case Classification Review Eco Services DBR EPA ID FLR000197939 10....pdf](#)  
[Draft Case Classification Review Eco Services DBR with Division Comments.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Norva:

Please insert the DWM concurrence version of this case review as a DMA Department Comments→  
Case Classification Review



**Karen Kantor, PG**  
**Environmental Manager - Compliance Assurance**  
Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[karen.e.kantor@dep.state.fl.us](mailto:karen.e.kantor@dep.state.fl.us)  
Office: 561-681-6670  
Main: 561-681-6600  
Fax: 561-681-6755



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**From:** Scarborough, Jill R.  
**Sent:** Monday, December 12, 2016 8:26 AM  
**To:** Kantor, Karen E. <[Karen.E.Kantor@dep.state.fl.us](mailto:Karen.E.Kantor@dep.state.fl.us)>; Perrigan, Glen  
<[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>  
**Cc:** Andreotta, Jason <[Jason.Andreotta@dep.state.fl.us](mailto:Jason.Andreotta@dep.state.fl.us)>; Blandin, Norva  
<[Norva.Blandin@dep.state.fl.us](mailto:Norva.Blandin@dep.state.fl.us)>; Walker, Kim (Waste) <[Kim.Walker@dep.state.fl.us](mailto:Kim.Walker@dep.state.fl.us)>; Bahr, Tim  
<[Tim.Bahr@dep.state.fl.us](mailto:Tim.Bahr@dep.state.fl.us)>  
**Subject:** RE: Request for Case Classification Review - Eco Services DBR Inc. EPA ID FLR000197939

Karen,

The Division has completed the Case Specific Classification Review for Eco Services DBR, Inc. FLR000197939 . At this time, the Division concurs with the District that formal

enforcement is not appropriate.

Thank you,

Jill Scarborough

**Jill R. Scarborough**  
**Environmental Consultant**  
**Division of Waste Management**  
**Florida Department of Environmental Protection**  
**850-245-8782**

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**From:** Kantor, Karen E.  
**Sent:** Friday, December 9, 2016 1:34 PM  
**To:** Perrigan, Glen <[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>; Scarborough, Jill R. <[Jill.R.Scarborough@dep.state.fl.us](mailto:Jill.R.Scarborough@dep.state.fl.us)>  
**Cc:** Andreotta, Jason <[Jason.Andreotta@dep.state.fl.us](mailto:Jason.Andreotta@dep.state.fl.us)>; Blandin, Norva <[Norva.Blandin@dep.state.fl.us](mailto:Norva.Blandin@dep.state.fl.us)>  
**Subject:** Request for Case Classification Review - Eco Services DBR Inc. EPA ID FLR000197939  
**Importance:** High

Glen/Jill:

Please find attached the docs for a case classification review for a secondary violator. The violations involved used oil/filters only (no hazardous waste), and all corrective actions were completed in timely response to the inspection.

Thank you!



**Karen Kantor, PG**  
**Environmental Manager - Compliance Assurance**  
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**From:** Blandin, Norva

**Sent:** Monday, December 5, 2016 4:57 PM

**To:** Kantor, Karen E.

**Subject:** CCR - OC facility Eco Services DBR Inc. EPA ID FLR000197939

Edits and comments incorporated.



Norva Blandin, MSEM

Environmental Specialist III - Compliance Assurance

Florida Department of Environmental Protection

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**From:** Kantor, Karen E.

**Sent:** Tuesday, November 29, 2016 10:11 AM

**To:** Blandin, Norva <[Norva.Blandin@dep.state.fl.us](mailto:Norva.Blandin@dep.state.fl.us)>

**Subject:** FW: CCR - OC facility Eco Services DBR Inc. EPA ID FLR000197939

**Importance:** High

Please review the attached for edits made and comments. Complete revisions and return to me for submittal to the DWM.



**Karen Kantor, PG**

**Environmental Manager - Compliance Assurance**

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**From:** Blandin, Norva

**Sent:** Monday, November 21, 2016 11:55 AM

**To:** Kantor, Karen E. <[Karen.E.Kantor@dep.state.fl.us](mailto:Karen.E.Kantor@dep.state.fl.us)>

**Subject:** CCR - OC facility Eco Services DBR Inc. EPA ID FLR000197939

Karen:

For your review. In this case, the Department inspected them as a complaint; after discovery of the spill of the used oil (from UO tank truck engine), the facility responded and resolved noncompliance items within 7 days. This facility is a first time violator, no history of noncompliance and made a good faith efforts to return to compliance.

Regards,



Norva Blandin, MSEM

Environmental Specialist III - Compliance Assurance

Florida Department of Environmental Protection

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# Hazardous Waste Program

## CASE REVIEW FORM

Check Case Review Type: <input type="checkbox"/> Case Specific Classification Review  <input type="checkbox"/> Enforcement Case Review					
Current Date:		Inspection Date:		Inspector:	
EPA ID: _____  Facility Name: _____  Facility Address: _____  Reference Links: _____					
Alleged Violation Citation/Regulator Reference		Manual Guide	Potential for Harm	Extent of Deviation	Check All That Apply
1.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
2.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
3.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
4.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
5.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
6.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents

## Hazardous Waste Program CASE REVIEW FORM

Comments: (Optional)					
7.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
8.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
9.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
10.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					

DWM Notes:

Note: This staff assessment is preliminary and is designed to assist in the compliance review process, prior to final agency direction. Comments provided herein are not the final position of the Department and may be subject to revision, pursuant to additional information and/or further review.

Generator Status	Focus Area	Rule Cite
Generator/Transporter/Transfer Facility/Processor/Burner	Emergency Procedures U0141	279.22(d) / 279.43(c) / 279.45(h) / 279.52 / 279.64(g) 62-710.210 (5)
UOT/UOP/UOB/UOTF/UOMKT	Notification	62-710.500(1) 403.751 279.31(b)(2)
GEN/UOP/TFR	Filter Management U0131	62-710.850(5)(a)



Harm & Potential for Harm	Extent of Deviation
Moderate POTENTIAL FOR HARM RANKING	Moderate (Guidelines of Characterizing UO Violations, PDF version, page 5 #2)
NOT CHARACTERIZED 403.758(2) fixed \$300 penalty	NOT CHARACTERIZED
MINOR POTENTIAL FOR HARM RANKING	Moderate (Guidelines of Characterizing UO Violations, PDF version, page 7, #2)

Classification*	Regulation Description
Case Specific (potential SNC)	<p>Oil. (Generator/Transporter/Transfer Facility/ Processor/ Burner) Upon detection of a release of used oil to the environment that is not subject to the requirements of Part 280, Subpart F of this Chapter and which has occurred after the effective date of the recycled used oil management program in effect in the State in which the release is located, a generator must perform the following cleanup steps:</p> <ol style="list-style-type: none"> <li>1. Stop the release;</li> <li>2. Contain the released oil;</li> <li>3. Clean up and manage properly the released oil and any other materials; and</li> <li>4. If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.</li> </ol> <p>(Inadequate cleanup)</p>
SV (Compliance Assistance)	<p>62-710.500(1) The following persons shall annually register their used oil handling activities with the Department on DEP form 62-710.901(1): Used oil transporters and transfer facilities; Used oil processors; Used oil fuel marketers who sell used oil fuel; and Used oil burners of off-specification used oil.</p>
Case Specific (potential SNC)	<p>All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface. ( 3-10 Drums)</p>

**FACILITY NAME:** Eco Services DBR, Inc **Date:** 10/27/2016

**EPA ID No.:** FLR000197939 **Case #:**

	Violation	Description	Nature of Waste	Amount of Waste	Discharge	People	Threat
	279.22(d)	Used oil release, inadequate response	3	1	8	1	0
	62-710.850(5)(a)	UOF container mgmt.	2	5	0	1	4

**Nature of Waste**

High Hazard (acutely toxic or reactive)

Other HW

Used Oil

Used Oil Filters

**Amount of Waste**

> 5,000 kg (25 drums) of Waste

1,000 to 5,000 kg (5 to 25 drums) of Waste

25 gal to 1,000 kg (5 drums)

<25 gal of Waste

**Discharge**

Discharge to surface water or off site discharge.

Discharge to ground water

Discharge to soil or air

Discharge to Impervious Surface/Containment

Discharge-de minimus cleanup per 62-780 FAC

No Discharge

**Potential Exposures**

>1,000 people

101 - 1,000 people

10 - 100 people

<10 people

**Additional Threat Factors (select all that apply for specific violation-Use If no discharge observed)**

Fire or Explosion Risk

Incompatible Waste Storage

Risk of Employee Exposure above PELs

Container Integrity

## Inadequate Provisions for Detecting and Preventing Releases

**Length of Time Violations Continue (>180 days over accumulation time)**

### Chronic or Recalcitrant Violator

<b>SUBSTANTIAL (Major)</b>	Above 20
<b>SIGNIFICANT (Moderate)</b>	13-20
<b>MINIMAL (Minor)</b>	Under 13

Total Points
13
12
Score
6
4
3
2
8
5
2
1
12
10
8
6
4
0
4
3
2
1
4
4
4
4

4
4
4

## Harm and Potential for Harm Ranking System

FACILITY NAME: Eco Services DBR, Inc Date: 10/27/2016EPA ID No.: FLR000197939

Case #: \_\_\_\_\_

	Violation	Description	Nature of Waste	Amount of Waste	Discharge	People	Threat	Total Points
	279.22(d)	Used oil release (equipment not storage container)	3	1	8	1	4	17
	62-710.850(5)(a)	UOF container mgmt.	2	5	0	1	4	12

Nature of Waste							Score
High Hazard (acutely toxic or reactive)							6
Other HW							4
Used Oil							3
Used Oil Filters							2
Amount of Waste							
> 5,000 kg (25 drums) of Waste							8
1,000 to 5,000 kg (5 to 25 drums) of Waste							5
25 gal to 1,000 kg (5 drums)							2
<25 gal of Waste							1
Discharge							
Discharge to surface water or off site discharge.							12
Discharge to ground water							10
Discharge to soil or air							8
Discharge to Impervious Surface/Containment							6
Discharge-de minimus cleanup per 62-780 FAC							4
No Discharge							0
Potential Exposures							
>1,000 people							4
101 - 1,000 people							3
10 - 100 people							2
<10 people							1
Additional Threat Factors (select all that apply for specific violation-Use If no discharge observed)							
Fire or Explosion Risk							4
Incompatible Waste Storage							4
Risk of Employee Exposure above PELs							4
Container Integrity							4
Inadequate Provisions for Detecting and Preventing Releases							4
Length of Time Violations Continue (>180 days over accumulation time)							4
Chronic or Recalcitrant Violator							4

<b>SUBSTANTIAL (Major)</b>	Above 20
<b>SIGNIFICANT (Moderate)</b>	13-20

11/03/16

## Harm and Potential for Harm Ranking System

<b>MINIMAL (Minor)</b>	Under 13
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