



# Florida Department of Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Ryan E. Matthews  
Interim Secretary

March 6, 2017

SENT VIA EMAIL

[yuri.turovsky@liquidenviro.com](mailto:yuri.turovsky@liquidenviro.com)

Mr. Yuri Turovsky, Plant Manager  
**Liquid Environmental Solutions of Florida, LLC**  
1640 Talleyrand Ave.  
Jacksonville, Florida 32206  
[yuri.turovsky@liquidenviro.com](mailto:yuri.turovsky@liquidenviro.com)

**RE: Liquid Environmental Solutions of Florida, LLC**  
**Facility ID No.: FLD 981 928 484**  
**Duval County – Hazardous Waste Program**

Dear Mr. Turovsky,

A compliance assistance inspection was conducted at your facility on November 30, 2016, under the authority of Section 403.091, Florida Statutes. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Potential non-compliance with the requirements of Chapter 403, Florida Statutes and Chapter 62-730, and 62-710, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the 'New Potential Violations and Areas of Concern' and respond within **30 days** of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue(s) or provide a time schedule describing how/when the issue(s) will be addressed;
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit your facility to discuss the items of concern.

**Liquid Environmental Solutions of Florida, LLC**

Facility ID No.: **FLD 981 928 484**

Compliance Assistance Offer

Page 2 of 2

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond appropriately may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Homer Butler of the Northeast District Office at (904) 256-1531 or via e-mail at [Homer.Butler@dep.state.fl.us](mailto:Homer.Butler@dep.state.fl.us). We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink that reads "Matthew Kershner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matthew Kershner  
Environmental Manager

Enclosure: Inspection Report

cc: Matthew Kershner, FDEP NED  
Pam Fellabaum, FDEP NED  
Homer Butler, FDEP NED  
Alisha Simpson, FDEP NED



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

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**FACILITY INFORMATION:**

**Facility Name:** Liquid Environmental Solutions of Florida LLC

**On-Site Inspection Start Date:** 11/30/2016      **On-Site Inspection End Date:** 11/30/2016

**ME ID#:** 33798      **EPA ID#:** FLD981928484

**Facility Street Address:** 1640 Talleyrand Ave, Jacksonville, FL 32206-5436

**Contact Mailing Address:** 1640 Talleyrand Ave, Jacksonville, FL 32206-5485

**County Name:** DUVAL

**NOTIFIED AS:**

CESQG (<100 kg/month)

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter facility

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Homer D Butler, Inspector

**Other Participants:** Pam Fellabaum, Inspector; Yuri Turovsky, Plant Manager

**LATITUDE / LONGITUDE:** Lat 30° 20' 36.3664" / Long 81° 37' 44.8878"

**SIC CODE:** 4953 - Trans. & utilities - refuse systems

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Liquid Environmental Solutions of Florida, LLC. (LES) was inspected November 30, 2016, as an unannounced hazardous waste compliance inspection. The facility is operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. LES has been issued the EPA/DEP identification number FLD 981 928 484. Please use this EPA/DEP identification number on all hazardous waste related correspondence with the Department.

The facility was issued Used Oil and Material Processing Facility permit numbers 72815-HO-012 and 72815-HO-015 and Solid Waste permit numbers 72815-SO-013 and 72815-SO-014. These permits expire November 20, 2017. The facility is permitted to discharge wastewater generated during its operations to city sewer under Industrial User Discharge Permit (IUDP) #019 issued February 1, 2013. This IUDP expires February 1, 2018.

LES is not a terminal receiver of solid waste as it only processes spent industrial waste streams with the resulting solid waste being transported to a landfill. The facility is registered as a Used Oil Transporter, Processor, and Marketer (Off-Spec) Facility; a Used Oil Filter Transporter/Transfer Facility, and Filter Processor; and a Petroleum Contact Water (PCW) Recovery/ Transporter/ Management Facility. LES leases the property, owns the facility, and has been operating at this location since December 23, 2009. LES has 27 employees, and is on city water and sewer. LES operates six days a week, Monday through Friday, and half of the day on Saturday.

The LES main administrative office is located across the street and north of the permitted operating facility. The permitted operating facility is comprised of a Laboratory Building and Trailer, a Maintenance Shop and

Inspection Date: 11/30/2016

Trailer Complex, the Facility Processing Area, and the Transportation Area. Mr. Yuri Turovsky, Plant Manager, was present throughout the inspection on November 30, 2016.

### Process Description:

#### Laboratory Building and Trailer

The Laboratory Building is located at the front left corner of the Facility Processing Area and is connected to the Trailer by a corrugated steel roof. The Trailer contains the Plant Managers Office, Back Laboratory, and a Supply Room.

LES personnel collect samples from all incoming liquid waste using a Composite Liquid Waste Sampler (COLIWASA) for fingerprint analysis. After sampling, the COLIWASA is placed in a secondary containment sump for continuous use. There was what appeared to be oil in the sump and on the soil adjacent to the sump (Photo 1). At the time of the inspection, the facility had failed to clean-up the release in this area (Photo 2) [Permit Condition, Part II #8, and 40 CFR 279.54(g)].

In the two laboratories, a fingerprint analysis is performed for pH, flashpoint, total organic halogens (TOH), metals (except mercury), and PCB's. In the Back Laboratory, small amounts of waste laboratory solvents are generated from Dexsil Chlor-D-Tect Q4000, Chlor-D-Tect 1000, and Chemical Oxygen Demand (COD) 20-1500 mg/l test kits. Review of the SDS for the Chlor-D-Tect kits indicates the kit contains ampules with ethanol, naphthalene, mercuric nitrate in water, and sulfuric acid in water containing <0.05% cadmium. Flashpoints of the individual ampules range between 48°F and 162°F. Other lab analyses may use solvents such as toluene, acetone, hexane, or small prefilled vials of water. Spent solvent waste may be F003, F005, or D001 hazardous waste. Spent COD test vials are D002/D007/D009/D011 hazardous waste.

Spent Chlor-D-Tect and COD test kit vials generated from the Back Laboratory are emptied into two glass satellite containers that were properly labeled (Photos 3 and 4). The facility triple-rinses all emptied spent glass vials and disposes of them as non-hazardous waste. When full, both satellite accumulation containers are emptied into the facility's hazardous waste accumulation container located outside the Laboratory Building entrance approximately once a month (Photo 5). A portion of all used oil samples are maintained for 30 days in a refrigerator located outside the entrance of the Laboratory Building (Photo 6). The excess used oil that is not saved is accumulated in a small container. The container inside the Laboratory Building was properly closed and labeled with the words "Used Oil" (Photo 7). When full, the container is emptied into either Tank 61 or 62 at the Solids/Sludge/Residues Management area.

#### Laboratory Record Review

Incoming Material Profile Form (MPF) shipments were compared with the LES Receiving Document Database (RecvDoc) for permitted requirements. Mr. Turovsky stated that when a new customer is serviced by LES, an MPF and a sample of the customer's used oil is collected as part of the waste profile evaluation and approval process. The sample is analyzed for TOH prior to the first pickup, and the profile is re-certified annually by LES. If the initial used oil sample is evaluated and approved, LES does not perform TOH tests on future used oil shipments from the customer. However, the generator is still required to provide an MPF to certify the used oil shipment does not contain greater than 1,000 ppm halogens.

When needed, the hazardous wastes generated from laboratory operations are manifested for disposal to a permitted hazardous waste Treatment Storage or Disposal Facility (TSDF). The most recent shipment of 112 pounds of D002/D007/D009/D011 hazardous waste was sent to ECOFLO, Inc. of North Carolina (NCD 980 842 132) on September 16, 2013, for disposal. LES generates one 55-gallon drum of hazardous waste for disposal once every two to three years.

The facility's permit requires that used oil acceptance records contain the following information: the name, address, and EPA ID number (if applicable) of the transporter who delivered the used oil, as well as the generator, the quantity of each type of used oil accepted, the date of acceptance, the waste stream approval number, and the off-load tank number. At the time of the inspection all the records reviewed contained these permitted requirements.

All incoming MPFs and laboratory analyses are maintained electronically in a computer located inside the Laboratory Building. LES staff use an inventory program called RecvDoc to retain records for a minimum of

Inspection Date: 11/30/2016

three years.

#### Maintenance Shop and Trailer Complex (MSTC)

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The MSTC is located adjacent to the Facility Processing Area. The MSTC is comprised of three semi-truck containers, a conex-box, and a small maintenance shop shelter. The maintenance shop is used for repairing items such as pumps and valves.

No hazardous waste is generated in this area. Mr. Turovsky told inspectors that no used oil or used oil filters are generated. There were no containers accumulating in these areas.

#### Facility Processing Area (FPA)

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The FPA is comprised of seven major sections: Used Oil Processing Area, Oily Water Treatment Area, Petroleum Contact Water (PCW) Treatment, Wastewater Treatment Area, the Plate and Frame Filter Press Area (PFFPA), Solids/Sludge/Residues Management Area (SSRMA) and Container Storage Area.

The FPA contains 71 aboveground storage tanks in a large secondary containment area (SCA). All tanks were properly labeled "Used Oil" or "PCW" as applicable and all were located within the SCA capable of containing 110% of the volume capacity of the largest tank.

The SCA is comprised of an integrated stormwater, liquid, and trench drainage collection system. Stormwater and liquids are collected in one of five sumps and a center-line trench drain located in the SCA. One sump is between Tanks 9 and 37, two are adjacent to the side of Tank 6, one is adjacent to Tank 84, and one is between Tanks 92 and 91. The trench drain extends out from Tank 6 in the center of the SCA. All liquids accumulated in the SCA collection system are transferred to the Oily Water Treatment Area and will be discussed in detail below.

An inspection of the SCA revealed what appeared to be used oil and oily water accumulating around tanks inside the SCA (Photos 8 and 9). Mr. Turovsky told the inspectors that the SCA is cleaned with a pressure washer and scrubbed down at the end of each day. The facility is reminded that liquid and debris accumulation should be removed within 24 hours of detection in accordance with Permit Condition, Part I #40.

The inspection of the SCA also revealed that there were a few cracks and one large piece of loose concrete in the center of the containment floor (Photo 10). At the time of the inspection, the facility had not repaired these areas [Permit Condition, Part I #33, and 40 CFR 279.54(d)(2)].

The facility appeared to have adequate safety, spill, and decontamination equipment available in the FPA. According to inspection records, LES tests and maintains required equipment for communications, fire protection, spill control, and decontamination as necessary to ensure proper operation in time of emergency.

#### Used Oil Processing Area

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The Used Oil Processing Area is located southwest of the FPA. Twenty aboveground tanks are dedicated for used oil processing with a total capacity, of 312,175 gallons. The facility is authorized to store and use 95% of the total capacity which is 296,566 gallons of used oil. Mr. Turovsky said that roughly 10% of all incoming shipments are used oil. Shipments of used oil are off-loaded into Tanks 51 and 52 that have a capacity of 15,000 gallons each.

The used oil is processed by gravity separation, heating, and/or the addition of de-emulsifying chemicals. After treatment, the oil is transferred to Tanks 24-26 (15,000 gallons each) and Tank 27 (15,700 gallons) to cool down. If no other processing is necessary, the oil is directed to Tank 54 (19,000 gallons), Tank 55 (9,750 gallons), and Tank 56 (20,000 gallons) for shipment off-site. The remaining tanks in this area are used for oil recirculation and storage and are as follows: Tank 10 (4,800 gallons); Tank 12 (7,800 gallons); Tank 14 (9,750 gallons); Tank 16 (16,075 gallons); Tank 18 (9,950 gallons); Tanks 19, 20, and 22 (7,800 gallons each); Tank 23 (9,950); Tank 53 (85,000 gallons); and Tank 101 (6,000 gallons).

Gravity separated oily water from the used oil tanks is transferred to Tank 44. This tank is an oil/water separator with a capacity of 10,000 gallons. Generated oil from Tank 44 is transferred back to either Tank 51 or Tank 52. Accumulated solids/sludge from tank bottom sludge are transferred to the PFFPA for further

Inspection Date: 11/30/2016

processing. Both oily water and solids/sludge processes are described below.

An inspection of the south wall of the SCA in the Used Oil Processing Area had a long crack where it appeared as though several concrete blocks had separated or had been insufficiently patched or caulked (Photo 11). At the time of the inspection this area had not been repaired [Permit Condition, Part I #33, and 40 CFR 279.54(d)(2)]. The soil directly under the SCA wall was stained with what appeared to be used oil from inside the SCA (Photo 12). At the time of the inspection, the facility had failed to clean-up the release [Permit Condition, Part II #8, and 40 CFR 279.54(g)].

#### Used Oil Processing Records Review

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LES markets used oil in a batch of 13,000 gallons or more from Tanks 54 and Tank 55. All outgoing used oil shipments are checked against a fingerprint analysis unique to the receiving facility. Outgoing shipments to Used Oil Marketers and Processors are analyzed for: pH, flashpoint, TOH, and metals. Outgoing off-spec shipments to Used Oil Burners are analyzed for: flashpoint, TOH, and percent water. Used oil prepared for off-site shipment usually remains on-site for one to two weeks. All sales transactions are recorded on an LES receipt of sale form and electronically retained on site for a minimum of three years.

Used Oil Processor permit records and annual reports were reviewed and appeared to be in order.

#### Oily Water Treatment Area

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The Oily Water Treatment Area tanks are located north of the FPA. Sixteen tanks are dedicated to oily water treatment with a total capacity of 320,040 gallons. The oily water tanks are configured as follows: Tank 1 and Tank 2 (27,270 gallons each); Tank 6 (62,000 gallons); Tank 70 (9,500 gallons); Tank 71 and Tank 72 (6,500 gallons each); Tank 83 and Tank 84 (5,500 gallons each); Tanks 85-88 (6,000 gallons each); Tank 90 and Tank 91 (5,000 gallons each); and Tank 93 and Tank 94 (12,000 gallons each).

Oily water is off-loaded from tank and vacuum trucks at one of three receiving stations located in front of the FPA. From the receiving station, oily water is transferred to Tanks 1 or 2. Tank 6 is connected to the FPA stormwater, liquid and trench drain SCA system. From Tanks 1, 2, and 6 oily water is transferred to Tank 44 the oil/water separator. Free oil is syphoned off and transferred back to the Used Oil Processing tanks for further treatment. The remaining wastewater is transferred to the dissolved air flotation (DAF) unit Tank 45 (2,000 gallons), DAF Inlet Tank 45A (1,000 gallons), and DAF Clarifier Tank 47 (4,200 gallons).

Depending on the profile, some oily water is transferred to a heat exchanger, Tank 44 the oil/water separator, and then to DAF Tanks 45, 45A, and 47 for treatment. In the DAF tanks, wastewater liquid is chemically treated for pH adjustment to induce coagulation and flocculation. Separated Solids/Sludge/Residues are pumped to the Management Area described below for further processing. The treated wastewater is then discharged to the Jacksonville Electric Authority (JEA) Public Owned Treatment Works (POTW) at Buckman Street under JEA IUD Permit #019.

The gravel and soil adjacent to the three off-loading areas outside the SCA for the Oily Water Treatment Area's receiving stations was stained with what appeared to be used oil (Photos 13-15). At the time of the inspection, the facility had failed to clean-up the releases [Permit Condition, Part II #8, and 40 CFR 279.54(g)].

#### Petroleum Contact Water (PCW) Treatment

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The facility receives PCW by tanker trucks. Two PCW tanks are adjacent to Tank 83 inside of the FPA. PCW is recovered by stationary separation and it is accumulated only in the aboveground Tanks 81 and 82 (5,000 gallons each). Decanted wastewater and debris are transferred to tank 6 for oily water treatment. The volume of PCW stored at the facility in Tanks 81 and 82 does not exceed 10,000 gallons at any given time. Tanks 83-87 are not being used for PCW At this time. These tanks contain oily waste water.

#### PCW Records Review

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Outgoing shipments of PCW to Marketers and Processors are checked for: pH, percent water, TOH, and flashpoint. According to Mr. Yuri Turovsky, PCW remains on-site for 2-3 weeks before being transported off-site. All sales transactions are recorded electronically on an LES receipt of sale form and retained in an on-

Inspection Date: 11/30/2016

site computer for a minimum of three years.

PCW records and annual reports for the previous three years were reviewed and appeared to be in order at the time of the inspection. PCW tanks are being inspected daily.

#### Wastewater Treatment Area

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The Wastewater Treatment Area is located southeast of the FPA. Fifteen tanks are dedicated to Wastewater Treatment with a total capacity of 236,650 gallons. The Wastewater Treatment Area consists of the following tanks: Tanks 7 and 8 (22,000 gallons each); Tank 9 (23,000 gallons); Tank 30 (500 gallons); Tank 31 (10,000 gallons); Tanks 32-34 (12,000 gallons each); Tank 35 (10,000 gallons); Tank 35A (11,650 gallons); Tanks 36 and 37 (20,000 gallons each); and Tanks 38 and 39 (30,000 gallons each). Wastewater treatment Tank 98 is located at the PFFPA and has a capacity of 12,000 gallons.

LES accepts only non-hazardous, non-biological industrial wastewater. Wastewater is derived from PCW petroleum storage facilities, industrial processes, landfill leachate collection systems, tank cleaning, transportation, and environmental remediation sources. Wastewater is received primarily from tank and vacuum trucks.

Accepted shipments of wastewater are off-loaded at one of three receiving stations located north of the FPA. Depending on the waste stream profile, wastewater is transferred to the oil/water separator, and then transferred to the DAF Unit, Inlet, and Clarifier tanks. In the DAF tanks, wastewater liquids are chemically treated to adjust the pH which induces coagulation and flocculation. Separated solids/sludge/residues are transferred to the PFFPA for further processing as described below.

The treated wastewater is then discharged to the JEA POTW at Buckman Street under IUD Permit #019. JEA monitors the wastewater discharge for permit compliance in a utility building located on site at LES.

#### The Plate and Frame Filter Press Area (PFFPA)

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The PFFPA tanks are located to the right of the main gate entrance inside the FPA. Eight tanks are dedicated for the PFFPA with a total capacity of 73,500 gallons. The PFFPA tanks consists of: wastewater solids Tank 60 (12,000 gallons), oily water slurry Tank 70 (9,500 gallons), DAF solids Tanks 89 and 90 (10,000 gallons each), FPA slurry Tanks 93 and 94 (12,000 gallons each), and the Plate and Frame Filter Press (PFFP) waste solids Tanks 95 and 96 (4,000 gallons each).

Waste solids collected from the wastewater and DAF tanks are transferred to the FPA slurry tanks with combined liquids from the oily water slurry tank. The waste solids in the FPA tanks are pH-adjusted by addition of a lime slurry from Tank 99 (1,000 gallons). The pH-adjusted slurry is then transferred to the PFFP waste solids tanks. In the PFFP waste solids tanks, treated waste solids are transferred into the PFFP. In between dewatering cycles, a pre-coat chemical is applied to the PFFP from Filter Press Pre-Coat Tank 97 (1,000 gallons). This process ensures dewatered waste solids are dropped into an awaiting roll-off.

LES performs one Toxicity Characteristic Leaching Procedure (TCLP) analytical test per quarter on a random roll-off containing the dewatered waste solids. The dewatered waste solids are disposed of at the Camden County, Georgia Municipal Waste Landfill. The most recent analytical report on August 31, 2016, was reviewed and the results indicated that the waste solids were non-hazardous.

#### Solids/Sludge/Residues Management Area

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Two open, concrete and steel lined Tanks, 61 and 62, are dedicated for solids and sludge solidification and have a total capacity of 16,000 gallons (Photo 16). The facility is authorized under its Solid Waste permit to generate wastewater treatment solids and oily solids waste from the facility's wastewater treatment processes and used oil processing.

A back loader equipped with a heavy screen cage is used to physically separate the liquids from the solids in each tank (Photo 17). Facility staff use a large suction hose to transfer the trapped oily waste liquid to the oil/water separator. Removal of liquid oily waste from the tank during the solidification process reduces the overall waste volume by more than half. Bails of absorbent paper material are used for solidification of leftover tank sludge. Waste solids are placed into 20-cubic yard roll-off containers and shipped to the same

Inspection Date: 11/30/2016

permitted, lined solid waste landfill for disposal as the PFFP waste solids. LES generates 10 to 15 roll-offs of solid waste per month.

Mr. Turovsky said that the used oil processing tanks are cleaned out once per year. This process generates approximately 100 to 200 gallons of oily sludge per tank, and it is disposed of in the roll-offs with the solids/sludges/residues generated at the facility.

LES performs one analytical test per quarter on a random roll-off containing the dewatered solids. The most recent analytical report on September 28, 2016 was reviewed, and the results indicated that the waste solids were non-hazardous.

#### Container Storage Area

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The Container Storage Area is approximately 1,000 square feet. At the time of the inspection, 30 55-gallon drums were stored in this area (Photo 18). Eight drums were empty and 22 drums were closed and labeled as non-hazardous waste. All drums were on an oil-impervious surface.

The facility is a registered used oil filter processor; however, the facility does not process the used oil filters it receives. Mr. Turovsky said that the facility receives a very small number of used oil filters which are shipped off-site for recycling one or two times per year. The filters arrive at the facility in drums, and any free liquids inside the drum are pumped out and processed as used oil prior to off-site disposal.

After removal of any free liquids, the drums are placed into a separate storage area until they can be picked-up for disposal by Georgia Petroleum, Inc. of Georgia, (GAD 981 222 433). At the time of the inspection, the facility had four drums of used oil filters onsite (Photo 19). The drums were closed, properly labeled with the words "Used Oil Filters" and on an oil-impervious surface.

#### Transportation Area

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The Transportation Area is a large sand lot where the facility has a container trailer for maintenance supplies and equipment. The facility also parks its tanker trucks, disconnected semi-truck trailers and tankers in this area. Several empty 150-gallon tanks, and three 1,000-gallon aboveground tanks were also observed in this area.

LES primarily accepts shipments from third party carriers, however, LES is registered as a Used Oil Transporter and occasionally transports the wastes treated at the facility.

No hazardous waste is generated in this area. Mr. Turovsky said that all vehicles are serviced off site and that no used oil or used oil filters are generated. There were no containers accumulating in these areas.

Training provided for used oil transportation personnel includes a review of the state and federal used oil regulations, review of halogen screening requirements and procedures, emergency response procedures, review of the Spill Prevention, Control, and Countermeasures (SPCC) Plan, Contingency Plan, use of alarms and communication devices, and firefighting.

#### Record Review

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LES is currently operating as a CESQG of hazardous waste for small amounts of lab waste. Hazardous waste is manifested off-site to ECOFLO, Inc. of North Carolina (NCD 980 842 132). The facility had its current "Used Oil" registration Form displayed from the Department and has submitted its current certificate of liability insurance. LES has also submitted its 2016 Used Oil and PCW annual report to the Department's Tallahassee Office.

LES operating records, including internal inspections, financial assurance statements, personnel training, SPCC Plan, and Contingency Plan were reviewed and appeared to be in order.



Inspection Date: 11/30/2016

**New Potential Violations and Areas of Concern:****Violations**

Type: Violation  
Rule: **279.54(d)(2)**  
Explanation: 1. The secondary containment in the FPA had a few cracks and one large piece of loose concrete in the center of the containment floor.  
2. The south wall of the SCA in the Used Oil Processing Area had a long crack in it and it appeared as though several concrete blocks had separated or had been insufficiently patched or caulked.  
Corrective Action: No further action is required. The facility is in compliance per December 30, 2016, and January 25, 2017 emails.

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Type: Violation  
Rule: **279.54(g)**  
Explanation: The facility failed to clean up the release of used oil in the following areas:  
1. The soil adjacent to the secondary containment sump for the COLIWASA equipment.  
2. The soil directly under the south wall for the SCA areas in the Used Oil Processing Area.  
3. The gravel and soil adjacent to the three off-loading areas for the Oily Water receiving stations.  
Corrective Action: In order to return to compliance, the facility should immediately perform the following steps upon detection of a release of used oil to the environment:  
1. Stop and contain the release of used oil.  
2. Clean up and properly manage the released used oil and remove any contaminated materials or soil for proper disposal.  
3. If necessary to prevent future releases, repair or replace any equipment leaking used oil before returning the equipment to service.

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**PHOTO ATTACHMENTS:**

Photo 1



Photo 2



Inspection Date: 11/30/2016

Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8





Inspection Date: 11/30/2016

Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14





Inspection Date: 11/30/2016

Photo 15



Photo 16



Photo 17



Photo 18



Photo 19



Inspection Date: 11/30/2016

**1.0 - Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 11/30/2016

**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.

Homer D Butler

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE***Homer D Butler***PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

02/13/2017

**DATE**

Pam Fellabaum

**Inspector NAME**

Inspector

**Inspector TITLE**

FDEP

**ORGANIZATION**

Yuri Turovsky

**Representative NAME**

Plant Manager

**Representative TITLE**

Liquid Environmental Solutions

**ORGANIZATION**

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.

**Report Approvers:****Approver:** Pam Fellabaum**Inspection Approval Date:** 02/13/2017