Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

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FACILITY INFORMATION:

Facility Name: Anywhere Fleet Repair, LLC

On-Site Inspection Start Date: 04/20/2017 **On-Site Inspection End Date:** 04/20/2017

ME ID#: 104582 **EPA ID#:** FLR000188151

Facility Street Address: 3242 Fox Ridge Blvd, Zephyrhills, FL 33543-5143

Contact Mailing Address: 3242 Fox Ridge Blvd, Zephyrhills, FL 33543-5143

County Name: PASCO

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon Kennedy, Inspector

Other Participants: Merry Allen, ; Kevin Allen, ; Elizabeth Knauss, Environmental Consultant

LATITUDE / LONGITUDE: Lat 28° 12' 16.0891" / Long 82° 17' 7.1435"

SIC CODE: 7538 - Services - general automotive repair shops

TYPE OF OWNERSHIP: Private

Introduction:

Anywhere Fleet Repair is a mobile vehicle lube and maintenance business operated by Kevin and Merry Allen. As part of the business operations, Mr. Allen transports used oil and used oil filters generated during oil changes. These are stored pending pickup by another registered used oil transporter. In general, the business transports less than 55 gallons of oil at any one time. However, Mr. Allen registered as a used oil transporter as he may occasionally transport more than 55 gallons of used oil at a time when operating outside of Pasco County.

Process Description:

Company equipment is transported to job sites in a box trailer. A labeled 55 gallon used oil drum is located within secondary containment in the trailer, along with new oil and lead acid batteries. If the used oil volume exceeds drum capacity, small containers are used to transport the oil. Oil filters are transported within a plastic bin in the same trailer. Mr. Allen does not transport USDOT regulated hazardous materials.

From the trailer, oil is transferred to a 275-gallon, labeled single walled above ground tank located in a metal shed. The tank is secondarily contained within a 360-gallon black PIG tank spill containment unit. Used oil filters were being stored inside the shed in labeled 55 gallon drums. The used oil drums were not double-walled and were not in secondary containment; the drums were sitting on laminate flooring, surrounded at the base by absorbent socks. Mr. Allen indicated that he would obtain a container(s) for use as secondary containment for the used oil filter drums and contact the Department at the time of installation. The shed also held a tank and several drums of virgin lube oil.

Shipping documents and manifests were reviewed for 2014, 2015, 2016, and 2017. Used oil is picked up and transported by Heritage Crystal Clean in Tampa approximately every three months. The used oil shipping invoice for April 2017 did not have the generators EPA ID# documented. Per F.A.C. 62-710.510(1)(b), if a used oil generator has an EPA ID#, it must be written on any waste oil shipping documents. Mr. and Mrs. Allen must ensure that the used oil transporter properly fills out the disposal records, including verifying that

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Anywhere Fleet Repairs EPA ID# is written on the documents.. Crushed used oil filters are sent for recycling at a local recycling center.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Question Number:	5.10
Question:	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)
Explanation:	Containers storing used oil and used oil filters which are not double-walled, must be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. Three 55-gallon drums holding used oil and used oil filters were not double-walled and were not in secondary containment.
Corrective Action:	All containers storing used oil or used oil filters must have secondary containment. Once the three drums are relocated inside a secondary containment unit, the facility must submit photographic proof to FDEP.

Photo Attachments:

Used oil drums w/o secondary containment



used oil without



used oil filters without



Conclusion:

At the time of this inspection, Anywhere Fleet Repair was not in compliance with used oil storage requirements. Once all violations have been corrected, Mr. or Mrs. Allen must contact the Department to confirm corrective action has been completed.

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5.0 - Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✔		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✔		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✔		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✔		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✔
Item No.	Secondary Containment	Yes	No	N/A
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✔		
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✔		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)		✔	
5.12	Closed or otherwise protected from the weather? 62-710.401(6)			✔
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)		✔	
Item No.	Used Oil Releases	Yes	No	N/A
5.15	stop the release? 279.22(d)(1)			✔
5.16	contain the released oil? 279.22(d)(2)			✔
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✔
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✔
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			✔
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			✔
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✔		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✔		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✔		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✔		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✔		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)		✔	

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Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.28	stop the release? 62-710.850(5)(b)(1)			✓
5.29	contain the released oil? 62-710.850(5)(b)(2)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)(b)(3)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)(4)			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			✓
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓

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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.

Shannon Kennedy
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE

PRINCIPAL INSPECTOR SIGNATURE

DEP
ORGANIZATION

DATE

Kevin Allen
Representative NAME

Anywhere Fleet Repair
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.

Merry Allen
Representative NAME

Anywhere Fleet Repair
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.

Elizabeth Knauss
Supervisor NAME

Environmental Consultant
Supervisor TITLE

FDEP
ORGANIZATION

Report Approvers:

Approver: _____ **Inspection Approval Date:** _____