



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

FACILITY INFORMATION:

Facility Name: US Lubricants LLC

On-Site Inspection Start Date: 03/29/2017 **On-Site Inspection End Date:** 03/29/2017

ME ID#: 115059 **EPA ID#:** FLR000213777

Facility Street Address: 7855 W 2nd Ct Bay 2, Hialeah, FL 33014-4332

Contact Mailing Address: 7855 W 2nd Ct, Hialeah, FL 33014-4332

County Name: MIAMI-DADE

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Environmental Specialist

Other Participants: Kathy R. Winston, Inspector; Jose Fernandez, Owner

LATITUDE / LONGITUDE: Lat 25° 53' 38.7852" / Long 80° 17' 19.6116"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

US Lubricants LLC (USL) is a new used oil processing facility (since 2015) but operates sporadically. The plant itself is a self-contained unit installed in a single bay of a multi-unit warehouse. The facility is leased from Commercial Group LLC and is connected to city water and sewer. The facility has only two employees as the drivers are employees of USL's used oil transporter, transfer facility, and marketer site.

USL's ultimate goal is to be picking up used oil from their established clients and delivering new oil back to these same clients.

Notification history:

Notified as Used Oil Processor - 1/30/15

Inspection history:

12/16/15 - inspected by the Department; minor OC violations; CWOE was pursued.

PPE was not required to enter this facility; Department personnel were equipped with steel toe boots and safety glasses.

Inspection Date: 03/29/2017

Process Description:

As indicated above, USL is using an all-in-one unit made by the Chongqing Zhongneng Oil Purifier Manufacturing Co. Ltd. The machine processes used oil by first centrifuging out any large particulates and then adding acids to make the metals precipitate out. The oil is then run through an oil/water separator and sent to a reactor with clay added to eliminate any gases. Following that, the system has a filter to remove the clay, and then three carbon filters of diminishing mesh sizes used for polishing. At this point, the remaining liquid is run through a filter press and the resultant liquid is the finished product. There is a 275 gallon used oil storage tank sitting inside the containment pan, which is there as feedstock for the system, and it was properly labeled. Due to processes taking place at this facility the only hazardous waste expected to be generated will be the sludge from the filter press. The facility already has a drum staged on a containment pallet for the collection of this waste stream. Besides preparing for waste collection, the facility has all required and appropriate safety and spill response equipment in place and ready for use.

The inspectors did not observe any additional used oil containers on site neither for hazardous wastes.

Preparedness and Prevention: During the inspection, the inspector observed fire extinguishers on site, eye wash area, spill kits and proper internal communication system in case of emergency. The facility must need to replace the eye wash solution because was expired. Also, evacuation map must need to be posted within the limits of the facility.

The company is only performing some very minor wet chemistry testing on the site: % water, viscosity, and specific gravity. The facility is using Penn Air Labs of Miami to do their on-spec verifications. The new plant operator that was hired to run this system appears to have a good chemistry and used oil management background and should be an asset to keeping the system performing at its' best.

Record Review:

There was only one (1) acceptance and delivery information to review (dated 9/23/15) but the logs have been created and have all the required information included. They have also already implemented a general facility inspection log. The inspectors required to maintain facility inspection logs up to date even if the facility is not operating continuously. The facility's generation status remains as Conditionally Exempt Small Quantity Generator; therefore, container inspection logs are not required. The facility's active permit, closure plan, and waste analysis plan were on site and the Department's approval letter was posted. The facility received their permit on June 4, 2015, which includes the facility's approved closure and waste analysis plans; these items are on file with the Department and the facility was advised to make them readily accessible on site all the time.

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

Type:	Violation
Rule:	279.52(a)(3)
Explanation:	Facility was not maintaining general facility inspection logs.
Corrective Action:	Please fill out a compliant general facility inspection log for a week and then send a copy to the Department.

Type:	Violation
Rule:	279.52(a)(2)(iii)
Explanation:	The facility's eye wash fluid was expired.
Corrective Action:	Please send Department pictures of new eye wash fluid; one of bottle and one of new expiration date.

Inspection Date: 03/29/2017

Type: Violation
Rule: **279.52(b)(3)(ii)**
Explanation: Facility could not demonstrate that their Contingency Plan had not been distributed to local authorities.
Corrective Action: Please distribute the Contingency Plan to local authorities and provide proof of distribution.

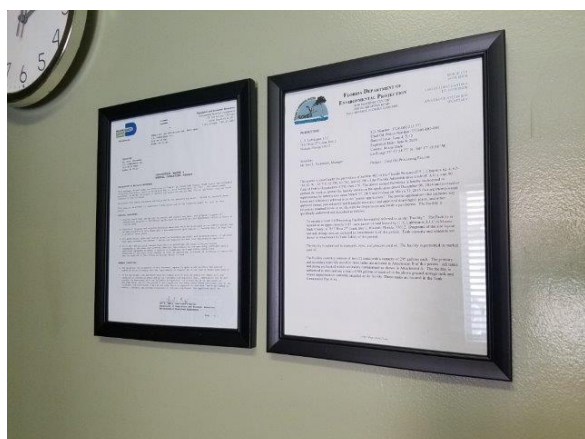
Type: Violation
Rule: **279.52(b)(2)(vi)**
Explanation: Their is no map of facility's evacuation routes or locations of emergency and/or decontamination equipment in Contingency Plan.
Corrective Action: Please either find the page in the facility's Contingency Plan with the information requested above or create a map and submit it to the Department.

Type: Violation
Rule: **62-710.800(6)**
Explanation: U.S Lubricants did not update the cost estimate for 2017 as required by 62-710.800(6).
Corrective Action: Please, provide to the Department a copy of your cost estimate for the current year and send original to Tallahassee.

*** Violation was corrected via submittal of documentation on July 17, 2017. ***

PHOTO ATTACHMENTS:

UOP Permit displayed on site



Fire extinguisher on site



Inspection Date: 03/29/2017

UOP machine with secondary containment



Spill kits



Conclusion:

The facility was not in compliance at the time of inspection and was given 30 days to comply with all requirements as Used Oil processor.

Follow up emails for the noncompliance items were submitted to the facility on 4/5/17.

On 7/17/17, the Department received a submittal of compliance documentation related to the estimates for closures 2016-2017.

Inspection Date: 03/29/2017

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: 03/29/2017

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.

Norva Blandin

PRINCIPAL INSPECTOR NAME

Environmental Specialist

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION

Kathy R. Winston

Inspector NAME

Inspector

Inspector TITLE

Inspector SIGNATURE

DEP

ORGANIZATION **DATE**

Jose Fernandez

Representative NAME

Owner

Representative TITLE

US Lubricants

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: _____

Inspection Approval Date: 07/17/2017