



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

FACILITY INFORMATION:

Facility Name: TG Oil Services Inc

On-Site Inspection Start Date: 08/30/2017 **On-Site Inspection End Date:** 08/30/2017

ME ID#: 124783 **EPA ID#:** FLR000222836

Facility Street Address: 7815 W 2nd Ct Unit 2, Hialeah, FL 33014-4317

Contact Mailing Address: 7815 W 2nd Ct Bay 2, Hialeah, FL 33014

County Name: MIAMI-DADE

NOTIFIED AS:

Non-Handler

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Carlos Touzan, Owner

LATITUDE / LONGITUDE: Lat 25° 53' 38.364" / Long 80° 17' 16.764"

SIC CODE: 4959 - Trans. & utilities - sanitary services, nec

TYPE OF OWNERSHIP: Private

Introduction:

TG Oil Services, Inc. notified and was granted status as a used oil and hazardous waste transporter effective June 21, 2017. The company is mainly an elevator service and repair contractor, operating under Certificate of Competency #3526 for elevator repair. Mr. (Juan) Carlos Touzan provided information during this inspection. The company notified in order to be able to transport more than 55 gallons of used hydraulic oil and oily waste water at a time. The company appears to have notified as a hazardous waste transporter in error, as it does not transport hazardous waste and is not registered with the USDOT to transport hazardous materials. Used hydraulic oil and oily waste water are not USDOT hazardous materials, as the flash point of this material is over 200 degrees F. It was recommended that Mr. Touzan delete hazardous waste transporter registration when his used oil registration renewal is due. The company operates two vehicles, a van and a box truck. No used oil was on site, and Mr. Touzan said that he had not yet brought any oily waste back to the facility. Therefore, this inspection was mainly devoted to providing compliance assistance and training to Mr. Touzan.

Process Description:

The company's major waste stream is oily waste water, generated when cleaning out and sealing elevator pits. Used hydraulic oil is also sometimes generated. The company only uses water based detergents, Simple Green, Drylok and grout for cleaning and waterproofing. No hazardous solvents are used, and hazardous waste is not generated. The concrete in the pits may be ground to a clean surface prior to waterproofing, and the dust is collected and disposed of as oily debris.

These wastes are packaged in 55 gallon plastic drums. The facility has constructed racks for storing full and empty drums within the facility. Previously, the company made arrangements with another used oil transporter to pick up these wastes at the generator location, but wanted to be able to collect the material and

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transport it off site as a service to their customers. As the company may have several jobs a day, more than 55 gallons of waste may need to be transported at a time. Applicable recordkeeping requirements were discussed for oil generation and transport. Mr. Touzan was informed of the secondary containment requirement for used oil stored indoors in containers of more than 55 gallons, and for any size of container stored outdoors. He was also provided with stencils for labeling containers of used oil.

The company has been generating used oil transport records since August, as a means to document disposal for each generation site. The forms used for the customer site are tracked as incoming oil, and include fields for the name and address of the oil provider and transporter, the transporter EPA ID number, the quantity and type of oil and fields for information on how the company complies with the rebuttable presumption. As the company is the co-generator of the oil, they are able to state that the waste is not mixed with hazardous waste based on process knowledge. The form usually includes additional information specifying which elevator at the generator site was being serviced. The oil transport form includes several options for the type of oil, as it was adopted from a form used by another transporter. The differences between used oils based on USDOT hazardous materials classification and flash point were discussed. It was noted that in a number of cases, no representative of the oil provider had signed the receipts. Mr. Touzan was requested to maintain documentation that the company was authorized to sign the receipts as co-generator of the oil. If the oil is transported by TG, the company also needs to sign as the transporter. At this time, each receipt from a job is attached to the receipt for the outgoing oil. TG has been using JAM Environmental and Vacuum Service for oil disposal. Copies of these records were in order.

Mr. Touzan was provided with copies of Department Powerpoint presentations for training used oil generators and transporters, and was provided with links to the Department's web pages for used oil. Mr. Touzan was informed that annual used oil training would be required for company employees. Annual reporting requirements were also discussed.

Conclusion:

TG Oil Services was operating in compliance with used oil requirements applicable to their business.

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6.0 - Transporters 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.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - CESQG Bill-of-Lading			✓
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)			✓
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)			✓
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)			✓
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)			✓
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)			✓
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)			✓
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)			✓
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓

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Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(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.

Elizabeth Knauss
PRINCIPAL INSPECTOR NAME

Environmental Consultant
PRINCIPAL INSPECTOR TITLE

E. Knauss
PRINCIPAL INSPECTOR SIGNATURE

FDEP - SWD
ORGANIZATION 09/14/2017
DATE

Carlos Touzan
Representative NAME

Owner
Representative TITLE

TG Oil Services, Inc.
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: Elizabeth Knauss

Inspection Approval Date: 09/14/2017