



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

October 23, 2017

Mr. Alan Chandler, President
AAG Environmental, Inc.
PO Box 959
Newberry, FL 32669-0959
alan.chandler@aagenvironmental.com

Re: AAG Environmental, Inc.
EPA/DEP ID: FLR 000 167 635
Alachua County – Hazardous Waste

Dear Mr. Chandler:

Department personnel conducted a compliance inspection of the above-referenced facility on August 10, 2017. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Pamela Fellabaum at 904-256-1670 or via e-mail at Pamela.Fellabaum@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Heather Webber".

Heather Webber
Environmental Administrator

Enclosure: Inspection Report



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

FACILITY INFORMATION:

Facility Name: AAG Environmental Inc

On-Site Inspection Start Date: 08/10/2017

On-Site Inspection End Date: 08/10/2017

ME ID#: 94605

EPA ID#: FLR000167635

Facility Street Address: 25370 NW 8th Ln, Newberry, FL 32669-2538

Contact Mailing Address: PO Box 1199, Newberry, FL 32669-1199

County Name: Alachua

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Non-Handler facility

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Alan Chandler, President

LATITUDE / LONGITUDE: Lat 29° 39' 22.5787" / Long 82° 36' 38.5915"

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

TYPE OF OWNERSHIP: Private

Introduction:

AAG Environmental, Inc. (AAG) was inspected on August 10, 2017, as an unannounced hazardous waste compliance inspection. AAG was previously inspected by the Department's Hazardous Waste Program on November 6, 2014. The facility has been issued the EPA/DEP identification number FLR 000 167 635. Please use this number on all hazardous waste correspondence with the Department. Alan Chandler, President, was present during the inspection.

AAG is a hazardous waste transporter and a hazardous material emergency response contractor. The facility has been at this location since 2010, and it uses this one acre site to store response vehicles, spill equipment and for office space. The facility is on city water and sewer.

Process Description:

AAG routinely responds to and remediates hazardous material incidents and fuel spills. The facility may transport non-hazardous waste or hazardous waste generated from emergency response operations. The facility may also occasionally transport hazardous waste from emergency response methamphetamine laboratory clean-outs. In addition to response and transportation activities, AAG has been authorized by the Department to manage Conditionally Exempt Small Quantity Generator (CESQG) waste generated at other facilities. The authorization letter was sent to the facility on March 19, 2015. In the letter, the Department sets forth the management practices that AAG should observe when CESQG waste is managed at the facility.

Warehouse:

The facility's warehouse is located adjacent to the facility's offices. Equipment, vehicles and empty containers are stored inside and outside of the warehouse. Vehicle maintenance is performed off-site by private vendors. No hazardous waste or used oil is generated by facility activities that occur within the warehouse. If CESQG waste is brought to the facility, it is accumulated in one area of the warehouse. There was no

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CESQG waste accumulating on-site at the time of the inspection. When on-site, the CESQG waste is accumulated for one to two weeks before it is transported to Perma-Fix in Gainesville (FLD 980 711 071).

Record Review:

AAG is currently operating as a Non-Handler of hazardous waste, a Hazardous Waste Transporter, and has been authorized to manage CESQG waste. A review of the facility's manifests revealed that the last shipment of CESQG waste was for the US Department of Forestry for methamphetamine laboratory waste on August 3, 2017. The facility's registration is current and up to date. Personnel training records, operating records and logs are kept on-site. All records reviewed were found to be in order.

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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			✓

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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 checked="" 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)			✓
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)			✓

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Item No.	SQG Waste	Yes	No	N/A
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.

Pam Fellabaum

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

10/20/2017

Date

Alan Chandler

Representative Name

President

Representative Title

AAG Environmental, 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:**

Pam Fellabaum

Inspection Approval Date:

10/20/2017