Florida Department of Environmental Protection

Southeast District
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

January 3, 2018

VIA EMAIL: Epaul@synergyrecycling.org
Elliot Paul, Managing Member
Ricky's Oil & Environmental Services LLC
7209 NW 66th Street
Miami, FL 33166

VIA EMAIL: Rsmerkers@synergyrecycling.org
Rick Smerkers, General Manager
Ricky's Oil & Environmental Services LLC
7209 NW 66th Street
Miami, FL 33166

Re: Warning Letter # WL17-00069HW13SED
Ricky's Oil & Environmental Services LLC
7209 NW 66th Street
Miami, FL 33166
EPA ID # FLD981019755
Miami-Dade County

Dear Mr. Paul and Mr. Smerkers:

A hazardous waste and used oil compliance evaluation inspection (CEI) was conducted at your facility on August 3, 2017, under the authority of Section 403.091, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S., Chapter 62-710, Florida Administrative Code (F.A.C.) were observed.

During the inspection on August 3, 2017, Norva Blandin, Department inspector, notified facility representative Mr. Smerkers, General Manager, that potential violations existed at the facility, and Mr. Smerkers was encouraged to take corrective action within 15 days. The potential violations included were:

> Failure to include the EPA ID numbers of used oil generators on the facility's used oil acceptance and delivery record forms; failure to update the contact information of the facility's Emergency Coordinator in the facility's Contingency Plan; failure to notify local emergency authorities of the facility's updated/revised Contingency

Plan; failure to cover the facility's used oil filter roll-off container in a manner that would adequately protect the roll-off container from the elements; and failure to properly label the used oil filter roll-off container with the words "Drained Used Oil Filters."

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.141, 403.161 and 403.727, Florida Statutes.

Please contact Daniel Lopez, at (561) 681-6605, or Norva Blandin, at (561) 681-6728, within **15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

Sincerely,

Jennifer K Smith

Jennifer Smith
District Director
Southeast District
Florida Department of Environmental Protection

JS/JA/dl

Attachments: Hazardous Waste Inspection Report dated August 3, 2017

cc: Christopher Ricci, 1408 NE 26th Avenue, Fort Lauderdale, FL 33304

ec: Glen Perrigan, DWM via email Glen.Perrigan@dep.state.fl.us
Serge Beregovoy, Miami-Dade DERM via email beregs@miamidade.gov
Jason Andreotta, SED via email Jason.Andreotta@dep.state.fl.us
Norva Blandin, SED via email norva.blandin@dep.state.fl.us

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ricky's Oil & Environmental Services LLC

On-Site Inspection Start Date: 08/03/2017 **On-Site Inspection End Date:** 08/03/2017

ME ID#: 53784 **EPA ID#:** FLD981019755

Facility Street Address: 7209 Nw 66th St, Miami, FL 33166

Contact Mailing Address: 7209 NW 66th Street, Miami, FL 33166-9430

County Name: Miami-Dade

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility facility
Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Inspector

Other Participants: Rick Smerkers, General Manager

LATITUDE / LONGITUDE: Lat 25° 50' 2.7648" / Long 80° 18' 53.3203"

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

TYPE OF OWNERSHIP: Private

Introduction:

On August 3, 2017, one representative of the Florida Department of Environmental Protection (DEP) conducted a hazardous waste and used oil compliance evaluation inspection at Ricky's Oil & Environmental Services LLC.

During the inspection, ROS was represented by Mr. Rick Smerkers, the General Manager of the facility. The DEP was represented by Ms. Norva Blandin, an Environmental Specialist III.

Ricky's Oil & Environmental Services LLC (ROS) is situated on a 0.72 acre site in a heavy industrial area. The facility has been in operation at this site for approximately 65 years, and there are currently twelve (12) employees. The entire facility is connected to city water and sewer.

The facility's most recent Used Oil Handler Notification was filed with the Department on 02/27/2017, which characterized ROS as a Used Oil Processor, a Used Oil Transporter, a Used Oil Transfer facility, a Used Oil Marketer, a Used Oil Filter Transporter, and a Used Oil Filter Transfer facility. The Notification Form registration is set to expire on 06/30/2018.

The facility was most recently inspected by the DEP on 04/02/2015. One (1) minor recordkeeping violation was noted. Compliance Without Enforcement (CWOE) was pursued, as the facility returned to compliance (via submittal of the missing recordkeeping information to the Department) within fifteen days of the inspection.

PPE (Personal Protective Equipment) was required to enter this facility. The inspectors wore safety boots

throughout the inspection.

Process Description:

ROS is a permitted facility authorized to handle, process, transport, and market used oil and used oil filters. The facility consists of a tank farm contained within secondary containment, two office trailers, and a small parking lot. The ROS facility is completely surrounded by a security fence.

Mr. Rick Smerkers accompanied the inspector throughout the used oil compliance evaluation inspection of the ROS facility.

ROS has eleven (11) tanks on site that have a total aggregate capacity of 160,000 gallons. ROS maintains a fleet of eleven (11) vehicles, with which facility personnel transport used oil from ROS' clients (i.e. used oil generating facilities) to the ROS facility site. All used oil shipments arriving at the facility are offloaded into Tank Eight, unless the shipment's water content is less than five percent. If this is the case, the shipment's used oil is considered on-spec. The on-spec used oil is then stored in one of ROS's finished product tanks and marketed to the facility's used oil customers. Only Tank Eight is used for used oil processing, and ROS only engages in passive processing (i.e. no heat is used to process the used oil). However, an emulsifier is sometimes added to Tank Eight to aid in oil/water separation. The waste water that is generated as a result of this emulsifying process is collected, handled, and stored as oily water waste in properly closed and labeled containers within the facility's main storage area. ROS also uses an oil filtration system as a part of its oil processing operations. More specifically, ROS filters the used oil shipments determined to be on-spec before storing them in the facility's finished product tanks. Any sludge waste generated from this oil filtration process is collected, handled, and stored as oily solid waste (i.e. stored along with the facility's oily rag waste in properly closed and labeled containers) in the facility's main storage area.

Upon arrival at the facility, any used oil filters are completely drained by facility personnel. The drained used oil filters are then accumulated on-site in one (1) large, open container. Once the used oil filter container is completely filled, ROS personnel remove the filters and pack them into properly labeled and sealed containers, which are stored in the facility's main storage area and are ultimately shipped off-site as scrap metal for recycling.

The facility also has two (2) roll-offs in its tank farm area. These two (2) roll-offs each have a volume of twenty (20) cubic yards, and are located within the tank farm's secondary containment. One of the roll-offs is used to store used oil filters, while the other is used to store oily solids waste. Upon further inspection of photographs of the two (2) roll-off containers, the inspector noted that the roll-off container storing used oil filters was not adequately protected from the elements, as the container was not covered by a waterproof tarp or a roof (thereby potentially threatening the structural integrity of the roll-off container). Furthermore, the inspector noted that the roll-off container holding the drained used oil filters was not properly labeled with the label "Drained Used Oil Filters."

Other than the aforementioned violation involving the drained used oil filter roll-off container, the inspector did not observe any other violations pertaining to ROS' used oil and used oil filter processing/handling operations. The facility's eleven (11) tanks all appeared to be in good condition, and were all properly closed and labeled. The facility's eleven (11) used oil storage tanks and two (2) roll-offs were all located within properly constructed and sufficiently sized secondary containment. All oily water and oily solid wastes generated by the facility are handled and stored within properly closed and labeled containers. No used oil spills or active used oil releases were observed within either the tank farm or the main storage area by the inspector. The inspector did not observe used oil leaking from any of the used oil filters accumulated on-site, and all the containers used to store the drained used oil filters destined for transport off-site were properly labeled, completely closed, and adequately sized. The used oil filter containers destined for off-site transport also all appeared to be in good condition, and were located on an adequately sized oil-impermeable surface.

The inspector also observed that ROS maintained multiple Safety Preparedness Areas throughout the facility, in which fire extinguishers and spill kits were present.

DOT (Department of Transportation) placards were displayed (US DOT# 1118579FL) on the side of all trucks, and the transporter kept copies of the permits, notifications, contingency plan (in case of an emergency) and manifests on the truck. The trucks are also properly identified as used oil transporters, and have spill kits available for use.

Record Review:

>Acceptance and delivery records of the facility's last three years of used oil transport activities were available for review. Mr. Smerkers provided five (5) used oil acceptance and delivery records (dated 02/01/2017, 02/07/2017, 02/09/2017, 02/15/2017, and 02/24/2017) to the inspector. Upon reviewing these five (5) used oil acceptance and delivery records, the inspector noted that ROS failed to include the EPA ID numbers of the used oil generators whose used oil ROS was transporting on the documents. The inspector also reviewed acceptance and delivery records from 2015 and 2016, some of which were also missing the EPA ID numbers of the used oil generating clients listed on the documents.

Disposal records of the facility's last three years of used oil disposal activities were also available for review. The disposal records provided by Mr. Smerkers showed that all of ROS' used oil waste is handled by Vertex Energy, a refinery located in Louisiana that is a registered Used Oil Transfer, Storage, and Disposal (TSD) facility (EPA ID# 110003260337). The most recent used oil disposal manifest (labeled #514990 and dated 01/16/2017) provided by Mr. Smerkers indicated that ROS shipped a total of 27,171 gallons of used oil waste (via Florida East Coast Rail) to Vertex Energy for final disposal.

Disposal records also indicated that all of ROS' oily water waste handled by Cliff Berry, Inc. - Miami Terminal, a registered used oil transfer, storage, and disposal (TSD) facility (EPA ID # FLD058560699). Furthermore, the disposal records showed that all of ROS' oily solid waste (i.e. oil absorbents and oily rags) are handled by the Central Landfill, a permitted facility in Broward County authorized to incinerate oily solid wastes as a means of energy recovery. Disposal records also indicated that all of ROS' used oil filter waste are shipped as scrap metal to US Foundry (EPA ID # FLD004128336), a permitted facility in Miami authorized to recycle used oil filters.

>The facility's Used Oil and Used Oil Filter Annual Reports from the last three years were also available to the inspector for review. According to the observations of the inspector, the most recent Annual Report (dated 02/27/2017) appeared to be complete and in-order.

> Records of the facility's Used Oil Handler Certification of Liability Insurance forms from the last three years were also available for review. According to the observations of the inspector, these Certification of Liability Insurance forms appeared to be complete and in-order.

According to the most recent Certification of Liability Insurance form (dated 05/03/2017), ROS worked with J Smith Lanier & Co of Albany - March & McLennan Agency LLC to purchase multiple liability insurance packages as a means to cover any possible accident liability costs. Two of the liability insurance packages purchased by ROS were:

(1) Commercial General Liability Insurance (Policy Number GEC002043111) - provided by Indian Harbor Ins. Co. (NAIC# 36940); policy effective on 05/01/2017, and set to expire on 05/01/2018
(2) Pollution Liability Insurance (Policy Number PEC001679804) - provided by Indian Harbor Ins. Co. (NAIC# 36940); policy effective on 05/01/2016, and set to expire on 05/01/2019

According to the most recent Certification of Liability Insurance form, the Pollution Liability insurance package provided by Indian Harbor Ins. Co. any covers ROS for $5,000,000 of pollution liability insurance, $10,000,000 of aggregate insurance, and $25,000 of SIR insurance. According to the observations of the inspector, these insurance packages outlined in the Certification of Liability Insurance form appeared to be up-to-date and meet the Department's minimum insurance coverage requirements.

>Records of the facility's yearly financial reports (specifically its Used Oil Processing Facility Closing Cost Estimate Forms) from the last three years were also available for review. According to the observations of the inspector, these Closing Cost Estimate forms appeared to be complete and in-order. The inspector also reviewed the facility's most recent Closing Cost Estimate Form (dated 01/09/2017), which appeared to be complete and in-order.

> Records of the facility's Waste Analysis Plan were available for review. The inspector reviewed the facility's Waste Analysis Plan (WAP), which appeared to be complete and in-order. According to the facility's WAP, the halogen content of all used oil entering the facility is tested by ROS' transport vehicle operators, all of whom are trained in how to test the halogen content of used oil shipments. The operators test samples of used oil

shipments with a Tek-Mate Leak Detector, which will beep if the halogen content of the sample is over 1,000 parts per million (ppm). If the Tek-Mate Leak Detector beeps, the sample is then further tested with a "Dexsil" halogen solvent test kit. If the "Dexsil" kit also detects a halogen content level of over 1,000 ppm, ROS delays piping the used oil shipment into its ASTs, and instead sends a sample of the used oil shipment to Synergy Recycling in Kingsland, Georgia for further testing (i.e. so that Synergy Recycling can officially confirm that the used oil shipment has a halogen content over 1,000 ppm and is therefore a hazardous waste).

Records of this halogen content testing process were available for review by the inspector. Mr. Smerkers provided two (2) halogen testing sample compliance forms to the inspector, which indicated that three (3) different used oil shipments (dated 01/04/2017, 01/17/2017, and 05/01/2017) failed the Tek-Mate Leak Detector test. However, upon further testing with the "Dexsil" kit, all three (3) used oil shipments were determined to not have halogen contents of over 1,000 ppm, and were thus accepted by ROS. According to the observations of the inspector, the two (2) sample compliance forms appeared to be complete and in-order

The facility's WAP also indicates that all used oil classified as on-spec is sampled and sent to a certified laboratory which tests the samples for their arsenic, cadmium, chromium, lead and PCB content. If the laboratory test determine that the levels of the aforementioned heavy metals and chemicals are below the threshold of what would classify the on-spec used oil as hazardous waste, ROS then markets the used oil as on-spec oil to its used oil customers. Records of this on-spec used oil testing were available for review. Mr. Smerkers provided one (1) invoice form (dated 09/20/2016) from Advanced Environmental Laboratories, Inc., which indicated that ROS had shipped samples of its on-spec used oil to the laboratory for testing of the sample's nickel, zinc, cadmium, lead, chromium, and water content. According to the observations of the inspector, the invoice form appeared to be complete and in-order

> All employees receive initial and annual hazardous waste and used oil training, including training concerning the facility's proper hazardous waste and used oil handling, storage, and spill cleanup procedures. The facility had records of employee training that had occurred in the three (3) years prior to the inspection for its twelve (12) employees. The most recent of these training sessions (i.e. at the time of the inspection) had occurred on 05/05/2017.

> Records indicating that ROS personnel were conducting weekly inspections of the facility's ASTs and main storage area were available for review. The weekly inspection records observed by the inspector were satisfactory, and the most recent inspection (i.e. as of the time of the inspection) was listed to have occurred in the week prior to the inspection (i.e. between 07/27/2017 and 08/03/2017).

> The facility's Spill Prevention, Control, and Countermeasure (SPCC) Plan was available for review. According to the observations of the inspector, the facility's SPCC Plan appeared to be complete and in-order.

> The facility's Contingency Plan was also available for review. The facility's most recent Contingency Plan (dated 02/2013) had been changed since the previous FDEP inspection on 04/19/2013. ROS' most recent Contingency Plan included both the facility's Waste Analysis Plan and the facility's Closure Plan. However, the inspector noted that ROS personnel had not updated the plan with the facility's new Emergency Coordinator's (i.e. Mr. Smerker's) contact information. Furthermore, the inspector noted that facility personnel had also failed to notify local authorities of the facility's revised Contingency Plan (i.e. the Contingency Plan containing the contact information of ROS' new Emergency Coordinator).

> All DEP permits, forms, and inspection reports were prominently display in accessible locations on-site. According to the observations of the inspector, all of these documents appeared to be complete and in-order. The facility's DEP Storage Tank Registration Placard (issued on 05/25/2017, and set to expire on 06/30/2018) and its DEP Used Oil Handler Registration form (dated 02/27/2017, and set to expire on 06/30/2018) were both prominently displayed in an accessible location on-site, and both appeared to be complete and in-order.

> The facility is registered as a CESQG of hazardous waste. However, the inspectors did not observe any accumulated hazardous waste on-site during the inspection.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.510(1), 62-710.510(1)(b)
Explanation:	The facility was using an equivalent acceptance and delivery record form [62-710.901(2)]. Acceptance and delivery records provided by the facility to the inspector for review did not include the EPA ID number of the used oil generator whose used oil the facility was transporting.
Corrective Action:	Please provide copies of at least 2-3 weeks of corrected acceptance and delivery records (i.e acceptance and delivery records that include the EPA ID numbers of the used oil generators whose used oil the facility is transporting) to the Department. **The violation was corrected via submittal of documentation to the Department on 08/21/2017.**

Type:	Violation
Rule:	279.52(b)(4), 279.52(b)(4)(iv)
Explanation:	The facility failed to update the contact information of its new Emergency Coordinator in the facility's Contingency Plan.
Corrective Action:	Please submit a corrected version of the facility's Contingency Plan (i.e. the Contingency Plan that contains the updated contact information of the facility's new Emergency Coordinator) to the Department. **The violation was corrected via submittal of documentation to the Department on 08/11/2017.**

Type:	Violation
Rule:	279.52(b)(3), 279.52(b)(3)(ii)
Explanation:	The facility failed to notify local emergency authorities of the facility's revised Contingency Plan (i.e. the Contingency Plan that contained the contact information of its new Emergency Coordinator).
Corrective Action:	Please submit to the Department documentation demonstrating that the facility has notified local authorities of the facility's revised Contingency Plan (i.e. the Contingency Plan containing the contact information of the facility's new Emergency Coordinator). **The violation was corrected via submittal of documentation to the Department on 08/11/2017.**

Type:	Violation
Rule:	62-710.850(5)(a)
Explanation:	The facility failed to cover its drained used oil filter roll-off container in a manner that would adequately protect the container from the weather. The facility also failed to label the roll-off container with the label "Drained Used Oil Filters."
Corrective Action:	Please cover the drained used oil filter roll-off container in a manner that adequately protects the container from the weather. Also, please label the roll-off container with the label "Drained Used Oil Filters." Lastly, please submit to the Department photographs that illustrate that these two corrective actions have been taken. **The violation was corrected via submittal of photographs to the Department on 11/22/2017.**

PHOTO ATTACHMENTS:

Used Oil Above Ground Storage Tanks (ASTs) 1-5



Used Oil Above Ground Storage Tanks (ASTs) 5 and 7



Used Oil Spill Kit



Used Oil Transport Vehicle



Oily Water and Oily Solid Waste Main Storage Area



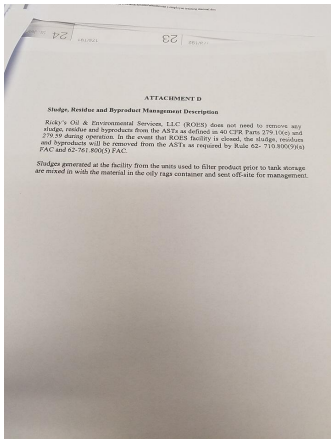
Drained Used Oil Filter Main Accumulation Container



Drained Used Oil Filters (Ready for Off-Site Transport) Storage Area



Used Oil Filtration Sludge, Residue, and Byproduct Management Description



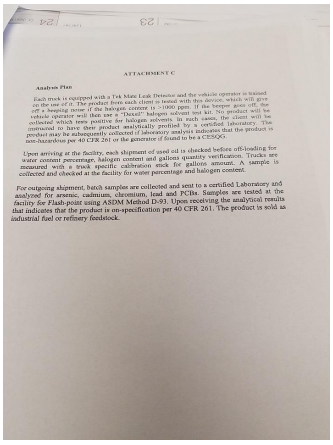
ATTACHMENT D

Sludge, Residue and Byproduct Management Description

Ricky's Oil & Environmental Services, LLC (ROES) does not need to remove any sludge, residue and byproducts from the ASTs as defined in 40 CFR Parts 279.1(f)(3) and 279.59 during operation. In the event that ROES facility is closed, the sludge, residues and byproducts will be removed from the ASTs as required by Rule 62- 710.800(9)(a) FAC and 62-761.800(5) FAC.

Sludges generated at the facility from the units used to filter product prior to tank storage are mixed in with the material in the oily rags container and sent off-site for management.

Used Oil Waste Analysis Plan



ATTACHMENT C

Analysis Plan

Each truck is equipped with a Tek Mate Leak Detector and the vehicle operator is trained on the use of it. The product from each client is tested with the detector which will give off a beeping noise if the halogen content is >1000 ppm. Each client is provided a test kit. No product will be collected which tests positive for halogen solvents. In each cases, the client will be contacted to have the product analytically profiled by a certified laboratory. The product may be subsequently collected if laboratory analysis indicates that the product is non-hazardous per 40 CFR 261 or the generator if found to be a CESQG.

Upon arriving at the facility, each shipment of used oil is checked before off-loading for water content percentage, halogen content and gallons quantity verification. Trucks are measured with a truck specific calibration stick for gallons amount. A sample is collected and checked at the facility for water percentage and halogen content.

For outgoing shipment, batch samples are collected and sent to a certified Laboratory and analyzed for arsenic, cadmium, chromium, lead and PCBs. Samples are tested at the facility for Flash-point using ASTM Method D-93. Upon receiving the analytical results that indicates that the product is on-specification per 40 CFR 261. The product is sold as industrial fuel or refinery feedstock.

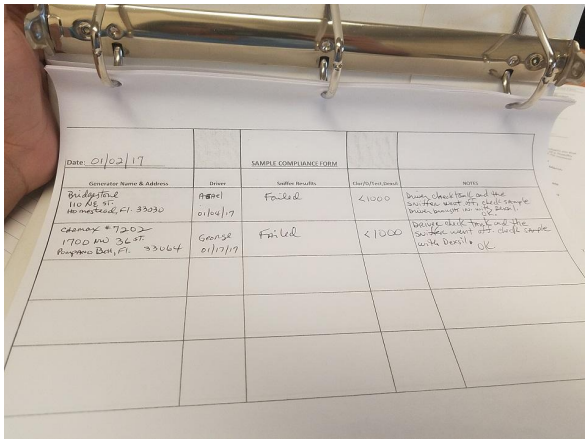
On-Site Tek-Mate Leak Detector



"Dexsil" Halogen Solvent Testing Kit



Used Oil Shipment Halogen Content Testing Log 1

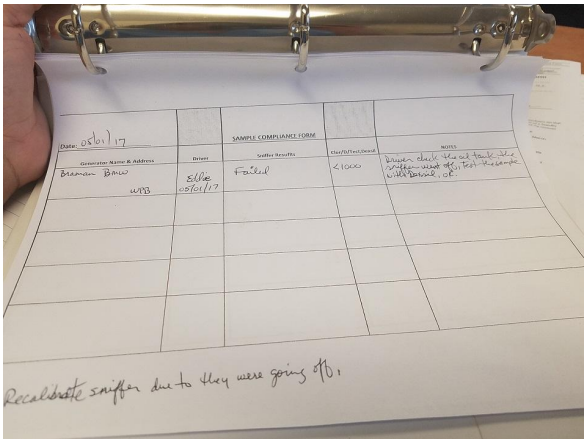


SAMPLE COMPLIANCE FORM

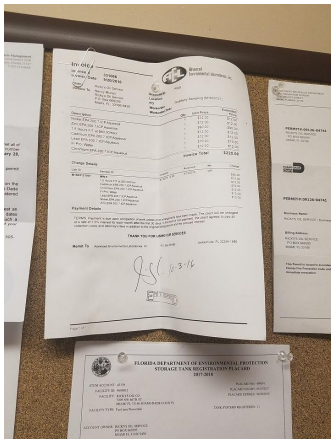
Date: 01/02/17

Generator Name & Address	Driver	Sniffer Results	Cl or PCB Test Result	NOTES
Bridgestone 110 NE 1st Homestead, Fl. 33030	Angel 01/04/17	Failed	>1000	Driver checked all the shutter went off, check sample with Dexsil OK
Chemax #7202 1700 NW 36 st. Ryanna Bch, Fl. 33064	Grouse 01/17/17	Failed	<1000	Driver check truck and the shutter went off check sample with Dexsil OK

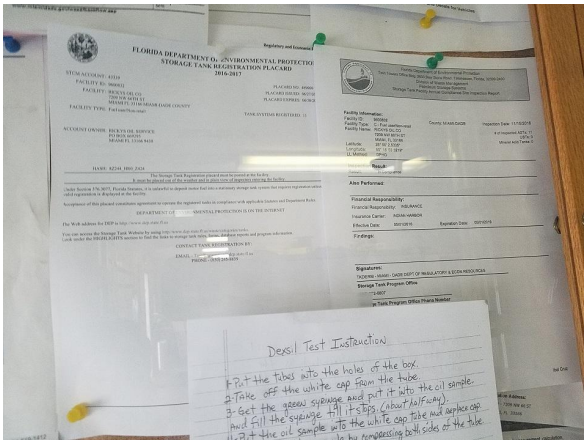
Used Oil Shipment Halogen Content Testing Log 2



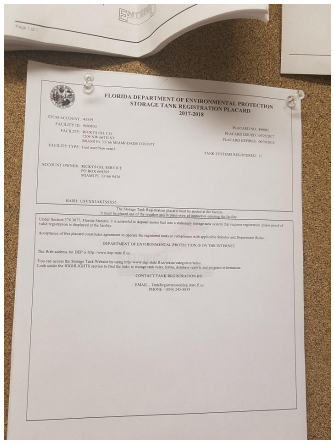
On-Spec Used Oil Laboratory Testing Invoice Form



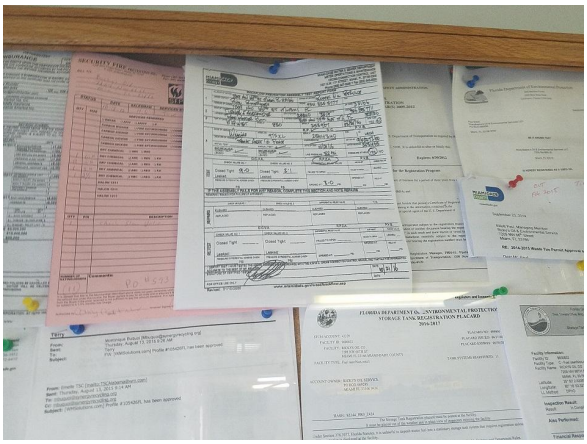
Storage Tank Registration Placard and Most Recent Inspection Report



Storage Tank Registration Placard 2



Used Oil Handler Registration Form



Conclusion:

According to the observations of the inspector, ROS transports, transfers/stores, processes, and markets used oil and used oil filters. Therefore, the facility appears to be a Used Oil Transporter/Processor/Marketer/Transfer Facility and a Used Oil Filter Transporter/Transfer Facility. All records required of Used Oil Processors/Transporters/Marketers/Transfer Facilities and Used Oil Filter Transporters/Transfer Facilities were reviewed by the inspector, and four (4) violations were observed.

Since the facility has the potential to produce CESQG quantities of hazardous waste in the future, ROS will also retain its status as a CESQG of hazardous waste.

An exit interview was provided to the facility on 08/03/2017. In this exit interview, the Department provided

Compliance Assistance to the facility so that the facility meets the standards required of Used Oil Processors/Transporters/Marketers/ Transfer Facilities and Used Oil Filter Transporters/Transfer Facilities. More specifically, the inspector requested that the facility submit all requested documentation to the Department within fifteen (15) days of the inspection, so that the facility may return to compliance.

Mr. Smerkers submitted all requested documentation to the inspector on 08/03/2017, 08/04/2017, 08/11/2017, and 08/21/2017, thereby resolving all documentation-related violation by 08/21/2017.

Upon further review of the inspection photographs, the Department noted that the facility had failed to properly cover and label the roll-off container used to store drained used oil filters on-site. The inspector contacted the facility on 11/15/2017, and requested that the facility take corrective action in order to address these two violations. More specifically, the inspector requested that the facility cover the used oil filter roll-off container (i.e. as a means to ensure that the future integrity of the roll-off container cannot be compromised by any potential water and/or weather damage). In addition, the inspector requested that the facility label the roll-off container with the label "Drained Used Oil Filters." Lastly, the inspector requested that the facility submit to the Department photographs illustrating that these two corrective actions had been taken.

The facility submitted photographs illustrating that the used oil filter roll-off container had been properly covered and labeled on 11/22/2017, thereby fully returning the facility to compliance on 11/22/2017.

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	✔		

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	Inspector	
Principal Inspector Name	**Principal Inspector Title**	
	DEP	12/11/2017
Principal Inspector Signature	**Organization**	**Date**

Rick Smerkers	General Manager
Representative Name	**Representative Title**
	Ricky's Oil Environmental Services
	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: Norva Blandin **Inspection Approval Date:** 12/11/2017