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

March 13, 2018

VIA EMAIL: emiranda@wpcorp.net
Eric Miranda, President
World Petroleum Corp.
2280 NW 121 Ave.
Plantation, FL 33323

SUBJECT: Department of Environmental Protection v. World Petroleum Corp.
OGC File No.: 18-0012
EPA ID No.: FLD980709075
Broward County

Mr. Miranda:

Enclosed for your records is a copy of the fully executed and filed Consent Order for the above-styled case. Please familiarize yourself with the compliance dates and terms of the Consent Order so that the complete and timely performance of those obligations may be accomplished.

Thank you for your cooperation in this matter. If you have any questions concerning this matter, please contact Norva Blandin at 561-681-6728.

Sincerely,

Jennifer K. Smith

Jennifer K. Smith
Southeast District Director
Florida Department of Environmental Protection

js/ja/nb/dl

cc: Lea Crandall, OGC, DEP Tallahassee (MS#35)
Shirley Richards, SED

ec: Norva Blandin, SED via email Norva.Blandin@dep.state.fl.us
Jason Andreotta, SED via email Jason.Andreotta@dep.state.fl.us
Eric Miranda, World Petroleum Corp., emiranda@wpcorp.net
Chad Gregory, World Petroleum Corp., cgregory@wpcorp.net

Florida Department of Environmental Protection

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

Rick Scott
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Carlos Lopez-Cantera
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Noah Valenstein
Secretary

March 6, 2018

VIA EMAIL: emiranda@wpcorp.net
Eric Miranda, President
World Petroleum Corp.
2280 NW 121 Ave.
Plantation, FL 33323

VIA EMAIL: cgregory@wpcorp.net
Chad Gregory, Director of Operations
World Petroleum Corp.
3701 SW 47TH Ave, Suite 101
Davie, FL 33314

SUBJECT: Department of Environmental Protection v. World Petroleum Corp.
OGC File No.: 18-0012
EPA ID No.: FLD980709075
Broward County

Mr. Miranda and Mr. Gregory:

The State of Florida Department of Environmental Protection ("Department") finds that World Petroleum Corp. ("Respondent") has violated used oil and hazardous waste management standards, in violation of Sections 403.721 Florida Statutes, Chapter 62-710, and Chapter 62-730, Florida Administrative Code (F.A.C). Before sending this letter, the Department requested that the Respondent undertake certain actions to resolve the violations. These actions have since been completed. However, due to the nature of the violations, the Respondent remains subject to civil penalties. The Respondent is also responsible for costs incurred by the Department during the investigation of this matter.

The Department's Offer

Based on the violations described above, the Department is seeking $2,260.00 in civil penalties and $500.00 for costs and expenses the Department has incurred in investigating this matter, which amounts to a total of $2,760.00. The civil penalties are apportioned as follows: $550 for violation of the rules F.A.C. 62-710.510(1) and F.A.C. 62-710.510(1)(b), $710 for violation of the rule 40 CFR 263.20(h)(2)(i), and $1,000 for

violation of the rules 40 CFR 279.52(b), 40 CFR 279.52(b)(4), 40 CFR 279.52(b)(3), 40 CFR 279.52(b)(3)(ii).

Respondent's Acceptance

If you wish to accept this offer and fully resolve the enforcement matter pending against the Respondent, please sign this letter and return it to the Department at the FDEP Southeast District Office, 3301 Gun Club Road, MSC 7210-1, West Palm Beach, FL 33406 by **March 13, 2018**. The Department will then countersign it and file it with a designated clerk of the Department. Once the document is filed with the designated clerk, it will constitute a final order of the Department pursuant to Section 120.52(7), F.S. and will be effective unless a request for an administrative hearing is filed by a third party in accordance with Chapter 120, F.S. and the attached Notice of Rights.

By accepting this offer you, Eric Miranda:

(1) certify that you are authorized and empowered to negotiate, enter into, and accept the terms of this offer in the name and on behalf of Respondent;

(2) acknowledge and waive Respondent's right to an administrative hearing pursuant to Sections 120.569 and 120.57, F.S., on the terms of this offer, once final;

(3) acknowledge and waive Respondent's right to an appeal pursuant to Section 120.68, F.S.; and

(4) acknowledge that payment of the above amount does not constitute a waiver of the Department's right, if any, to recover emergency response related costs and expenses for this matter.

The Department acknowledges that the Respondent's acceptance of this offer does not constitute an admission of liability for the violation(s) referenced above.

Respondent's Performance

After signing and returning this document to the Department,

(1) Respondent must pay $2,760.00 in full by **April 13, 2018.**

(2) Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number assigned to this Order and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at: http://www.fldepportal.com/go/pay/. It will take a number of days after this order is final and effective filed with the Clerk of the Department before ability to make online payment is available.

The Department may enforce the terms of this document, once final, and seek to collect monies owed pursuant to Sections 120.69 and 403.121, F.S.

Until clerked by the Department, this letter is only a settlement offer and not a final agency action. Consequently, neither the Respondent nor any other party may request an administrative hearing to contest this letter pursuant to Chapter 120, F.S. Once this letter is clerked and becomes a final order of the Department, as explained above, the attached Notice of Rights will apply to parties, other than the Respondent, whose interests will be substantially affected.

Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

Please be aware that if the Respondent declines to respond to the Department's offer, the Department will assume that the Respondent is not interested in resolving the matter and will proceed accordingly.

If you have any questions, please contact Kayla Acosta at 561-681-6636, Kayla.Acosta@floridadep.gov or Norva Blandin at 561-681-6728, norva.blandin@dep.state.fl.us.

Sincerely,

Jennifer K. Smith

Jennifer K. Smith
District Director
Southeast District Office

FOR THE RESPONDENT:

I, Chad Gregory [Type or Print Name], **HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.**

By: _____ Date: 3-8-18
[Signature]

Title: Chad Gregory
[Type or Print]

FOR DEPARTMENT USE ONLY

DONE AND ORDERED this 13th day of March, 2018, in Orange County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jennifer K. Smith
District Director
Southeast District Office

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Magdalena Pedroso
Clerk

March 13, 2018
Date

Attachments: Notice of Rights
Copy of the Warning Letter dated 01/10/2018

Final clerked copy furnished to:
Lea Crandall, Agency Clerk (lea.crandall@dep.state.fl.us)

NOTICE OF RIGHTS

Persons who are not parties to this Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under Sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Order means that the Department's final action may be different from the position it has taken in the Order.

The petition for administrative hearing must contain all of the following information:

a) The OGC Number assigned to this Order;

b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding;

c) An explanation of how the petitioner's substantial interests will be affected by the Order;

d) A statement of when and how the petitioner received notice of the Order;

e) Either a statement of all material facts disputed by the petitioner or a statement that the petitioner does not dispute any material facts;

f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Order;

g) A statement of the rules or statutes the petitioner contends require reversal or modification of the Order; and

h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Order.

The petition must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 within 21 days of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at the address indicated above. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under Sections 120.569 and 120.57, Florida Statutes. Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

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 10, 2018

VIA EMAIL: emiranda@wpcorp.net
Eric Miranda, President
World Petroleum Corp.
2280 NW 121 Ave.
Plantation, FL 33323

VIA EMAIL: cgregory@wpcorp.net
Chad Gregory, Director of Operations
World Petroleum Corp.
3701 SW 47TH Ave, Suite 101
Davie, FL 33314

Re: Warning Letter #WL17-00066HW06SED
World Petroleum Corp.
3701 SW 47th Ave, Suite 101
Davie, FL 33314
EPA ID # FLD980709075
Broward County

Dear Mr. Miranda:

A used oil compliance inspection was conducted at your facility on July 19, 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 July 19, 2017, Norva Blandin, Department inspector notified facility representative Mr. Chad Gregory, Director of Operations, that potential violations existed at the facility; and Mr. Gregory was encouraged to take corrective action within 15 days. The potential violations included were:

> Failure of a person who generates a solid waste, to determine if that waste is a hazardous waste, failure to include the EPA ID numbers of the generators of used oil in their acceptance and delivery records, failure to update the contact information of the facility's Emergency Coordinator in the facility's Contingency

Plan, and failure to notify local emergency authorities of the facility's revised Contingency Plan.

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 Kayla Acosta at (561) 681-6636 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/nb

Attachments: Hazardous Waste Inspection Report dated July 19, 2017

cc: Manes, Michael B. Esq. 950 South Pine Island Rd., A-150
Plantation, FL 33324

ec: Glen Perrigan, DWM via email Glen.Perrigan@dep.state.fl.us
Al Gomez, Broward County via email agomez@broward.org
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: World Petroleum Corp

On-Site Inspection Start Date: 07/19/2017 **On-Site Inspection End Date:** 07/19/2017

ME ID#: 50795 **EPA ID#:** FLD980709075

Facility Street Address: 3650 SW 47th Ave, Davie, FL 33314

Contact Mailing Address: 3701 SW 47th Ave Ste 101, Davie, FL 33314

County Name: Broward

NOTIFIED AS:

CESQG (<100 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility facility
Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Marketer facility
Routine Inspection for Used Oil Marketer facility
Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Norva Blandin, Inspector

Other Participants: Bridjette Bucell, Environmental Specialist II; Chad Gregory, Director of Operations

LATITUDE / LONGITUDE: Lat 26° 4' 34.1948" / Long 80° 12' 33.0274"

SIC CODE: 2992 - Manufacturing - lubricating oils and greases

TYPE OF OWNERSHIP: Private

Introduction:

On July 19, 2017 a representative of the Florida Department of Environmental Protection (FDEP) conducted a used oil compliance inspection at World Petroleum Corp (WPC). The facility is situated on a one acre site in an industrial area and is serviced by city water and a portable toilets. The facility has been in operation at this site since 1985, has 15 employees, and came under new ownership approximately six years ago. During the inspection, WPC was represented by Mr. Chad Gregory, the General Manager of the facility. The FDEP was represented by Norva Blandin and Bridjette Bucell, Environmental Specialists.

World Petroleum Corp. (WPC) is a permitted Used Oil Processor, permit number 0054228-HO-005, expiration date October 21,2018. WPC is also a registered used oil transporter, used oil transfer facility, used oil marketer, used oil filter processor, used oil filter transporter, used oil filter transfer facility, a hazardous waste transporter, and a Small Quantity Handler and transporter of Universal Waste. According to the documentation provided, the facility is currently registered as a used oil handler effective 06/30/2018 with the Department.

Notification History:
2/9/2017- notified as used oil transporter, used oil transfer facility, used oil marketer, used oil filter processor, used oil filter transporter, used oil filter transfer facility, a hazardous waste transporter and a Small Quantity Handler and transporter of Universal Waste.

Inspection history:
12/22/2014 - FDEP inspection. Minor OC; one (1) violation, resolved through Compliance without Enforcement (CWOE)
1/29/2013 - FDEP inspection. Minor OC; three (3) violations, resolved through Compliance without Enforcement (CWOE).

PPE (Personal Protective Equipment) was required to enter this facility. The inspectors wore safety boots and hard hats throughout the inspection.

Process Description:

The inspectors toured the facility located on 3650 SW 47th Ave in Davie, Florida. The record review and meeting was conducted in WPC's main office located at 3701 SW 47th Ave Suite 101 in Davie, Florida.

WPC is completely surrounded by security fencing and concrete-block walls. The facility consists of a tank farm (inside secondary containment), used oil filter and oily solid waste storage, designated areas for empty container storage, parking for the facility's fleet, a small trailer office, another small trailer used for minor repairs, and a waste water treatment plant. WPC maintains a fleet of 20 trucks, which are used to transport used oil from WPC clients (i.e. used oil generating facilities) to the WPC facility site.

Gravity separation and filtration are the processing mechanisms conducted by the facility for used oil. Used oil and oil containing water are filtered, transferred to a boiler tank, and then heated to 180 degrees Fahrenheit in order to further facilitate oily/water separation. The process is then shut down. After standing for eight hours, the separated water is pumped to a truck for delivery to Cliff Berry, Inc. and the used oil is diverted to holding tanks to be marketed to WPC customers. Mr. Gregory demonstrated to the inspectors that all piping was changed to hard piping to prevent any potential spill. The inspectors observed good housekeeping and best management practices (BMP's) implemented on site.

Used oil filters (UOF's), are crushed on site under a tented area surrounded with concrete berms. UOF's are shipped to US Foundry in Miami and the oily solid waste collected by WPC goes to Wheelbrator's Central Landfill in Broward County. At the time of the inspection, WPC was transporting hazardous waste and Universal Waste while sometimes brokering these jobs through PSC of Pompano Beach or AERC of Melbourne, respectively.

During the inspection, the inspectors observed a waste water treatment plant near to the tank farm area (named as chemical storage area). Mr. Gregory stated that this plant was out of service and is no longer in use. The inspectors observed twenty-two (22)- 55 gallon drums of chemical residuals (raw products). Most of the drums were partially empty. The facility was not able to demonstrate that a proper waste determination was conducted in order to dispose appropriately. Mr. Gregory will provide copies of the waste determination and disposal record.

According to the facility's Waste Analysis Plan (WAP), the halogen content of all used oil entering the facility is tested by WPC's transport vehicle operators, all of whom are trained in how to test the halogen content of their used oil shipments. WPC has a laboratory to conduct testing of the used oil in order to determine their content of halogens (Chlor D Tek). Also, complying with their waste analysis plan (WAP), the facility takes representative samples for on-spec certification using certified laboratories while keeping records on site for review.

DOT placards were displayed (US DOT1118579FL) on the side of all trucks, and the transporter keeps copies of the permits, notifications, contingency plan (in case of emergency) and manifests on the truck. Also, the trucks are properly identified as used oil transporters and have spill kits available on site.

Preparedness and Prevention measures including eye wash areas, fire extinguishers, an internal communication system, and spill kits were observed on site. WPC also conducts weekly and daily inspections (checklists) for their tanks and secondary containment areas, while also keeping documentation on site for review.

Record Review:
> Disposal Records for used oil, used oil antifreeze, used oil filters, oily water, and oily rags: pick-up and delivery records were provided at the time of inspection. At least three years were available for review. For UOF's waste are shipped as scrap metal to US Foundry (EPA ID # FLD004128336), a permitted facility in

Miami authorized to recycle used oil filters.
For Hazardous waste - WPC uses the services of Stericycle (EPA ID #FL0000702488) as (a) transporter and PSC/ Allworth (EPA ID #ALD094476793) as their designated facility. For Universal waste - WPC uses the services of AERC. During the inspection, the inspectors did not observe any accumulation of universal wastes.

> Contingency Plan/Notification to Local Authorities - the facility has a hard copy of their current Contingency Plan available during the inspection. It was noted that information of their emergency coordinator job description information was not updated; as a result, the emergency response arrangements and distribution of the plan to local authorities must be redistributed. The other elements required by rule were included in the Contingency Plan. This included: the Closure Plan, Waste Analysis Plan (WAP), and Emergency Response Procedures amongst others.

>Transport, receiving, and shipping records were available for review at the time of inspection. The facility was using an equivalent form [62-710.901(2)]. All acceptance and delivery records reviewed were out of compliance with requirements described in 40 CFR part 279.46. The facility failed to include the EPA ID numbers of the used oil generators whose used oil WPC was transporting on the documents. It was noted that for the hazardous waste transporting, EPA ID's were also not included in the manifests.

> The facility's Used Oil and Used Oil Filter Annual Reports from the last three years were also available to the inspector for review. The most recent Annual Report appeared to be complete and in-order. Last report was dated March 1, 2017.

> Liability Records - Records of the facility's Used Oil Handler Certification of Liability Insurance forms from the last three years were available for review. According to the observations of the inspector, these Certification of Liability Insurance forms appeared to be complete and in-order. The facility provided proof of Pollution Liability Insurance (Nautilus Ins Co) in the amount of $2M Policy #GLP202312510 and Policy #SSP202312710 Exp. Date: 7/7/2018.

> 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.

> Records of the facility's Waste Analysis Plan were available for review. The inspector reviewed the facility's Waste Analysis Plan, which appeared to be complete and in-order. More specifically, the facility appeared to have a standard operating procedure for the testing of the halogen content of used oil entering the facility.

> Employee Training - 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 maintains records for Used Oil Transporter certification for their employees and also for the hazardous waste transporter training (RCRA). Last training was conducted on 1/26/17 and 2/28/17 respectively.

> SPPC was available for review. Last revision dated 05/2017.

> All DEP permits, forms, and inspection reports displayed on-site appeared to be complete and in-order. In addition, the facility prominently displayed all permits and licenses issued by Broward County for its used oil handling activities in accessible locations on-site. The inspector observed that these county permits/licenses appeared to be complete and in-order.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Question Number:	2.6
Question:	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11
Explanation:	The inspectors observed twenty-two (22) - 55-gallon drums of chemicals that are in need to be determined if they are hazardous wastes or not. Based on the information provided by Mr. Gregory, these drums apparently contain chemical residuals from the waste water treatment plant.
Corrective Action:	Please provide to the Department, a copy of the inventory list of the chemicals, a copy of the full assessment, and copy of the disposal record for those wastes. *** violation was corrected on 8/14/17***

Type:	Violation
Rule:	62-710.510(1)
Explanation:	World Petroleum failed to include the EPA ID numbers of the generators of used oil in their acceptance and delivery records.
Corrective Action:	Please provide to FDEP at least two (2) weeks (after proper registration) of the manifest or acceptance/delivery records that include EPA ID numbers of the generators (if applicable), invoice numbers and destination name with EPA ID Number. *** Violation was corrected on 8/14/17 **** *** repeated violation from previous inspection conducted on 12/22/2014***

Type:	Violation
Rule:	263.20(h)(2)(i)
Explanation:	After reviewing the hazardous waste manifests, the inspectors observed that the waste manifests did not include EPA ID of the generators.
Corrective Action:	Please make the corrections and provide copies of the corrected manifests to the Department. *** Violation corrected on 8/14/17 ***

Type:	Violation
Rule:	279.52(b), 279.52(b)(4)
Explanation:	The facility failed to update the contact information of its Emergency Coordinator in the facility's Contingency Plan specifically job description.
Corrective Action:	Please submit a corrected version of the facility's Contingency Plan (i.e. the Contingency Plan that contains the updated job description of the facility's Emergency Coordinator) to the Department. ***violation was corrected on 8/14/17 *** *** this violation was observed on previous inspection conducted in 1/29/2013 and 12/22/2014 ***

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 Emergency Coordinator and job description).
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 job description of the facility's Emergency Coordinator). ***violation corrected on 8/14/17 *** *** repeated violation observed in the inspection conducted in 1/29/13***

PHOTO ATTACHMENTS:

WPC truck



UOF Crusher Machine



Tank Farm



WWTP (chemical storage)



Spill Kit Area



Lateral view of WPC



QC Lab



Conclusion:

According to the observations of the inspectors, WPC 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. The facility was not in compliance during the time of inspection and was given fifteen days to return to compliance.

On 8/14/2017, the facility provided all documentation required in order to correct the violations cited in this inspection report. According to the waste determination, sampling was conducted by Pace Analytical on 7/28/17. Four (4) - 55 gallon drums were determined to be non hazardous. The remaining drums: one (1) was empty and seventeen (17) - 55 gallon drums were raw good (products). Disposal record was provided to the Department. All violations regarding the missing elements for the Contingency Plan, used oil acceptance and delivery records, and manifest corrections for hazardous waste transporting were corrected. Documentation for these corrections were received by the Department.

Facility returned to compliance on 8/14/17.

2.0 - CESQG 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.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✔		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5	✔		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✔		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5	✔		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 ☐ Is it excluded under 261.4? ☐ Is it listed in subpart D of 261 or appendix IX of 261? ☐ Has the waste been analyzed? ☐ Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?		✔	
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) ☐ Name and address of the generator and TSD/authorized facility. ☐ Type and amount of hazardous waste delivered. ☐ Date of shipment	✔		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✔		

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) ☐ Exemption Type - Tolling Agreement ☐ 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 recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		

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) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ 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)	✓		

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**

Bridjette Bucell	Environmental Specialist II
Inspector Name	**Inspector Title**
	FDEP
	Organization

Chad Gregory	Director of Operations
Representative Name	**Representative Title**
	World Petroleum Corporation
	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