



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

FACILITY INFORMATION:

Facility Name: Everglades Waste Removal Services LLC
On-Site Inspection Start Date: 06/08/2018 **On-Site Inspection End Date:** 06/08/2018
ME ID#: 75033 **EPA ID#:** FLR000132506
Facility Street Address: 701 SE 32nd Ct Ste 201, Ft Lauderdale, FL 33316-4133
Contact Mailing Address: PO Box 22409, Ft Lauderdale, FL 33335-2409
County Name: Broward **Contact Phone:** (954) 527-9939

NOTIFIED AS:

Non-Handler

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility facility

INSPECTION PARTICIPANTS:

Principal Inspector: Daniel G Lopez, Environmental Specialist I
Other Participants: David Maloney, Environmental Specialist II; David Sills, Project Manager

LATITUDE / LONGITUDE: Lat 26° 5' 5.4" / Long 80° 8' 10"

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

TYPE OF OWNERSHIP: Private

Introduction:

On June 8, 2018 (06/08/2018), two (2) representatives of the Florida Department of Environmental Protection (DEP) conducted a routine used oil compliance evaluation inspection (CEI) of Everglades Waste Removal Services, LLC.

During the inspection, Everglades Waste Removal Services, LLC was represented by Mr. David Sills, the Project Manager of the facility. DEP was represented by Mr. Daniel Lopez, an Environmental Specialist I, and Mr. David Maloney, an Environmental Specialist II.

Everglades Waste Removal Services, LLC (EGWRS) is situated on two (2) separate properties, both of which are leased from Cliff Berry, Inc. More specifically, EGWRS leases office space in a building situated on an approximately two-acre property, the address of which is 701 SE 32nd Court, Suite 201, Fort Lauderdale, FL 33316. In addition, EGWRS leases an approximately two to three (2-3) acre property at Cliff Berry - Port Everglades Facility (EPA ID # FLR000083071), the address of which is 3400 SE 9th Avenue, Fort Lauderdale, FL 33316.

The facility has been in operation for approximately thirteen (13) years, and has approximately ten (10) employees. Both of the properties on which EGWRS operates are connected to the city of Fort Lauderdale's water and sewer system.

NOTIFICATION HISTORY

The facility's most recent Used Oil Registration Form was filed on February 27, 2018, which characterized EGWRS as a Used Oil Transporter and a Used Oil Filter Transporter.

However, upon reviewing the facility's most recent Used Oil Registration Form (dated 02/27/2018), the inspector noted the address at which EGWRS conducts the facility's oily water and used oil filter transport/transfer activities (i.e. 3400 SE 9th Avenue, Fort Lauderdale, FL 33316) was not listed as the

Inspection Date: 06/08/2018

facility's site address. In fact, according to the observations of the inspector, the 701 32nd Court, Suite 201, Fort Lauderdale, FL 33316 property that is listed as the facility's site address on EGWRS' most recent Used Oil Registration Form is an office space that serves as the facility's mailing address.

Upon noting the incorrect addresses that were listed on the facility's most recent Used Oil Registration Form, the inspector reviewed the geographical locations of the facility's mailing and site addresses. According to the observations of the inspector, the two (2) properties on which EGWRS operates are not contiguous, as the 701 32nd Court property is separated from the 3400 SE 9th Avenue property by a highway and a wooded area. Therefore, the inspector determined that the facility incorrectly listed both EGWRS' site address and EGWRS' mailing address on the facility's most recent Used Oil Registration Form.

INSPECTION HISTORY

EGWRS was most recently inspected by the Department on 12/15/2016. Two (2) minor labeling noncompliance issues were observed, and the noncompliance issues were corrected via submittal of photographs to the Department on 12/16/2016 (thereby returning the facility to compliance on 12/16/2016).

Personal Protective Equipment (PPE) was not required to enter the facility. The inspectors wore steel-toed boots throughout the inspection.

Process Description:

Everglades Waste Removal Services, LLC (EGWRS) operates as a transporter of oily water, used oil filters, and used oil absorbents. More specifically, EGWRS collects oily water, oily bilge water, used oil filters, and used oil absorbents that have been generated in ocean vessels, and transports the oily water, oily bilge water, used oil filters, and used oil absorbents to facilities that properly dispose of these waste streams.

The EGWRS facility consists of one (1) office space (which is approximately 2,100 square feet in size), and one (1) truck staging and waste storage area.

Mr. David Sills accompanied the inspectors throughout the inspection of the facility.

In the one (1) office space, EGWRS personnel conduct any administrative activities related to the facility's oily water, oily bilge water, used oil filter, and used oil absorbent transport activities. In the facility's one (1) truck staging and waste storage area, EGWRS personnel park the various tanker/box trucks used to transport oily water, oily bilge water, used oil filters, and used oil absorbents, and temporarily store these waste streams until their transport for proper disposal.

As a result of these oily water, oily bilge water, used oil filter, and used oil absorbent transport activities, EGWRS generates oily rags and used oil absorbents. In addition, universal waste is generated in the form of spent fluorescent lamps.

According to Mr. David Sills, EGWRS does not transport any used oil generated by ocean vessels. Furthermore, Mr. Sills informed the inspector that all EGWRS trucks requiring servicing are taken to Cliff Berry Inc. - Port Everglades Facility's mechanic shop, at which CBI-PE personnel conduct any required maintenance activities on the vehicles. In addition, Mr. Sills informed the inspector that EGWRS personnel do not generate any waste spray paint or waste aerosol cans at either of the properties. Therefore, EGWRS does not generate any hazardous waste, used oil, used oil filters, or spent lead acid batteries.

>> EGWRS OIL-CONTAMINATED WASTE TRANSPORT/STORAGE/DISPOSAL PROCEDURES OVERVIEW <<

EGWRS' oil-contaminated material transport truck fleet consists of five (5) oily water tanker trucks (each of which has a single-walled tank that has a total capacity of 9,000 gallons), three (3) vacuum trucks (each of which has a single-walled tank that has a total capacity of 3,000 gallons), and two (2) box trucks.

> The facility's five (5) oily water tanker trucks are used to transport and temporarily store oily water and oily bilge water that is removed from ocean vessels. According to Mr. Sills, EGWRS only pump 6,000 gallons of oily water/oily bilge water into each tanker truck at a time, which - once filled - transports the oily water to the truck staging and waste storage area for temporary storage.

Inspection Date: 06/08/2018

The facility's three (3) vacuum trucks are mostly used to transport used oil shipments from EGWRS customers that are too small in quantity (e.g. 2,000-3,000 gallon shipments) to be transferred into and transported by one (1) of the facility's five (5) tanker trucks. EGWRS personnel also use the facility's vacuum trucks to transport any small quantities of oily water that have been provided to EGWRS by the facility's customers in 55-gallon drums (the contents of which are vacuumed into one (1) of the vacuum trucks in the truck staging and waste storage area and - in turn - transported off-site for proper disposal). In addition, according to Mr. Sills, the three (3) vacuum trucks are occasionally used to vacuum up oily water spills that have occurred at either the facilities of EGWRS' customers or as a result of EGWRS' oily water transport activities.

However, Mr. Sills also informed the inspectors that - if a tanker/vacuum truck happens to be geographically close to Cliff Berry, Inc. - Miami Terminal (EPA ID # FLD058560699) and/or be transporting a large oily water shipment - the EGWRS tanker/vacuum truck driver will sometimes transport the oily water shipment directly from the EGWRS customer's facility to Cliff Berry, Inc.- Miami Terminal (CBI - Miami) for further processing and proper disposal.

According to Mr. Sills, all oily water and oily bilge water stored by the facility's five (5) oily water tanker trucks and three (3) vacuum trucks that is either brought to the truck staging and waste storage area for temporary storage or - in the case of the vacuum trucks - collected within the truck staging and waste storage area (i.e. from the 55-gallon oily water drums brought to the truck staging and waste storage area by EGWRS' two [2] box trucks) is usually not accumulated on-site for more than twenty-four (24) hours. Rather, Mr. Sills informed the inspectors that all oily water and oily bilge water shipments are usually transported from the truck staging and waste storage area to CBI - Miami (at which the oily water is transferred into CBI - Miami storage tanks for longer-term storage and/or further processing) within twenty-four (24) hours of EGWRS' acceptance of the oily water/oily bilge water for transport. In addition, Mr. Sills informed the inspectors that EGWRS do not maintain any oily water storage tanks within the truck staging and waste storage area, as all oily water collected by the tanker trucks remains within the tanker truck's storage tanks until the oily water's transport to Cliff Berry, Inc. - Miami (CBI - Miami) for proper disposal.

> The facility's two (2) box trucks are used to transport and temporarily store used drums of oil filters, oily rags, and used oil absorbents, which - once picked up from EGWRS' ocean vessel customers - are brought to the truck staging and waste storage area for temporary storage. According to Mr. Sills, the box trucks are also used to store any oily rags or used oil absorbents that are generated by EGWRS personnel during the facility's oily water transport procedures. Furthermore, Mr. Sills informed the inspectors that the box trucks are occasionally used to store small containers of oily water that have been generated by the facility's ocean vessel customers, the contents of which (due to their small capacities) are not transferred into one (1) of the facility's tanker trucks for transport to EGWRS' truck staging and waste storage area.

According to Mr. Sills, the used oil filter, used oil absorbent, and oily rag drums stored within the facility's two (2) box trucks may remain within the box trucks that are parked within the facility's truck staging and waste storage area for more than ten (10) days. In addition, Mr. Sills informed the inspectors that EGWRS does not maintain any storage areas/buildings for oil-contaminated material storage drums within the truck staging and waste storage area, as all used oil filter, used oil absorbent, oily rag, and oily water drums remain in the box trucks until the drums' off-site transport for proper disposal. However, Mr. Sills also informed the inspectors that - if a large enough quantity of used oil filter, used oil absorbent, and/or oily rag drums have been picked in a shipment (or a series of shipments picked up in one [1] day) - EGWRS box truck drivers will transport the used oil filter, used oil absorbent, and/or oily rag drum shipment(s) directly from the EGWRS customer facilities to Wheelabrator South Broward, Inc. (EPA ID # FLR000169292) for proper disposal.

> During the inspection, Mr. Sills detailed the facility's used oil filter, used oil absorbent, oily rag, and oily water storage drum disposal procedures. More specifically, Mr. Sills informed the inspectors that any oily water stored within 55-gallon drums that are accumulating in the box truck is transported to CBI - Miami for transfer into one (1) of EGWRS' vacuum trucks. In terms of the used oil filter, used oil absorbent, and oily rag storage drums, Mr. Sills informed the inspectors that EGWRS personnel empty the contents of each drum into separate plastic bags. Once the plastic bags are completely filled, EGWRS personnel tie the bag closed with duct tape, and then transfer the duct-taped closed bags back into the drums that were originally storing the oil contaminated materials.

EGWRS personnel then transport the aforementioned oil-contaminated material drums to Wheelabrator South Broward Inc., at which the plastic bags are removed from the drums and given to Wheelabrator South

Inspection Date: 06/08/2018

Broward Inc. (Wheelabrator South) facility personnel for proper disposal.

Once emptied of their oil-contaminated material contents, the empty drums are transported back to CBI-PE by EGWRS box truck drivers for cleaning. More specifically, upon arriving at CBI-PE, EGWRS personnel bring the drums into a self-contained wash bay, in which the drums are wiped down with unused spill pads and/or oily rags, rinsed out the drums with water, and - if necessary - additionally cleaned the drums with degreaser.

Once completely degreased, the cleaned metal drums are transported by EGWRS personnel to CBI - Miami, at which the drums are crushed and - in turn - sent off-site to a recycling facility for disposal as scrap metal. In addition, EGWRS personnel dispose of any cleaned plastic drums by cutting the drums into smaller pieces and - in turn - disposing of the smaller pieces as solid waste in the trash.

In terms of the degreaser/oil-contaminated rinse water generated in the cleaning bay, CBI-PE and EGWRS personnel vacuum all of the rinse water waste from the sump of cleaning bay (in which - according to Mr. Sills - all of the rinse water waste is collected during the drum cleaning process) into a vacuum truck, which - once filled - transports the liquid/sludge waste to CBI Miami for further processing and proper disposal. According to Mr. Sills, the liquid/sludge waste generated in the cleaning bay is usually transported to CBI Miami in CBI-PE vacuum trucks for further processing and proper disposal. However, Mr. Sills further informed the inspectors that EGWRS' vacuum trucks are occasionally used to remove and transport the rinse water waste from the cleaning bay to CBI Miami for further processing and proper disposal.

In terms of the used spill pads and oily rags generated in the cleaning bay, EGWRS personnel place all of the oil/degreaser-contaminated waste into plastic bags that - once filled - are duct-taped closed and placed in 55-gallon drums. The oil-contaminated material waste storage drums are then transported by EGWRS' box trucks to Wheelabrator South, at which the plastic bags of oil-contaminated waste are removed from the 55-gallon drums and given to Wheelabrator South personnel for proper disposal.

>> OFFICE SPACE <<

On the property situated at 701 SE 32nd Court, Suite 201, Fort Lauderdale, FL 33316, EGWRS maintains one (1) office space, at which EGWRS personnel oversee the facility's oil-contaminated material transport operations.

During the inspection, Mr. Sills informed the inspectors that none of the facility's various transport trucks are kept in the parking lot of this property. Therefore, no oil-contaminated materials are generated or stored at this property.

In addition, Mr. Sills informed the inspectors that EGWRS personnel no longer operate/maintain the truck maintenance shop that was observed on-site during the Department's 12/15/2016 inspection of the 701 SE 32nd Court property. Therefore, EGWRS no longer generates any used oil, used oil filters, oil-contaminated rags/spill pads, used antifreeze, spent lead acid batteries, or hazardous waste on this property.

Furthermore, Mr. Sills informed the inspectors that all spent fluorescent lamps generated in the office space are directly removed from the sockets by Cliff Berry, Inc. maintenance personnel, who immediately transport the spent fluorescent lamps off-site for proper disposal. Therefore, the inspectors did not observe any spent fluorescent lamps accumulating on-site during the inspection.

> TRUCK STAGING AND WASTE STORAGE AREA <

On the Cliff Berry, Inc. - Port Everglades (EPA ID # FLR000083071) property situated at 3400 SE 9th Avenue, Fort Lauderdale, FL 33316, EGWRS maintains one (1) truck staging and waste storage area, at which EGWRS personnel park all transport vehicles used as a part of the facility's oil-contaminated material transport operations. In addition, EGWRS personnel utilize a leased section of the Cliff Berry, Inc. - Port Everglades (CBI - PE) property as a temporary storage area for the oil-contaminated waste streams that are collected from the facility's customers and generated during the facility's transport activities.

Within the truck staging and waste storage area, the inspectors observed the following oil-contaminated material transport trucks:

> Four (4) silver oily water tanker trucks, all of which - according to Mr. Sills - were empty at the time of the

Inspection Date: 06/08/2018

inspection

> One (1) oily water tanker truck trailer, which - according to Mr. Sills - was empty at the time of the inspection
* During the inspection, Mr. Sills informed the inspector that the truck onto which the tanker trailer is usually mounted had been taken off-site for maintenance, and was thus not present in the truck staging and waste storage area (i.e. at the time of the inspection)

Upon observing the four (4) oily water tank trucks, the inspectors noted that each tanker truck is equipped with two (2) long drip pans, which run alongside each side of the tanker truck. According to Mr. Sills, these spill pans are used to collect any oily water that may spill during the transfer of oily water from an ocean vessel and into the tanker truck. In addition, Mr. Sills informed the inspectors that any oily water that collects within either of these drip pans is either cleaned up with unused spill pads or pumped into the tanker truck's storage tank for transport. Furthermore, Mr. Sills informed the inspectors that each of the spill pans is equipped with a drainage valve, which is used by EGWRS personnel to drain any rainwater that may accumulate within the drip pans.

In addition to the two (2) long spill pans, the inspectors observed that each of the tanker trucks is equipped with a five-gallon spill bucket, which - according to Mr. Sills - is used to collect any oily water that may spill from the drainage valve and/or hoses that are used by EGWRS personnel to transfer oily water from the tanker trucks into CBI - Miami's various oily water storage tanks.

According to the observations of the inspectors, each of the tanker trucks is equipped with a variety of safety and emergency response equipment. More specifically, each tanker truck is equipped with flex booms (which are stored in a tray that is mounted at the rear of each tanker truck), fire extinguishers, and unused spill pads (which are stored in a locker that is mounted on the side of each tanker truck).

> Three (3) green oily water vacuum trucks, all of which - according to Mr. Sills - were empty at the time of the inspection

> One (1) box truck, which - according to the observations of the inspectors - was being used to store oil-contaminated material drums at the time of the inspection

* According to the observations of the inspector, EGWRS' specific United States Department of Transportation (USDOT) registration number (i.e. USDOT1546257) was prominently displayed on the doors of the four (4) tanker trucks, the three (3) vacuum trucks, and one (1) box truck.

Within the one (1) box truck, the inspector observed the following eighteen (18) oil-contaminated material waste storage containers:

> Nine (9) empty silver 55-gallon drums, which were all observed to be closed

* According to Mr. Sills, these 55-gallon drums are given to the facility's customers as replacement containers for the oil-contaminated material storage drums that EGWRS personnel are transporting off-site for proper disposal

> Seven (7) unlabeled black 55-gallon drums of used oil absorbents and oily rags, all but one (1) of which were closed

* The one (1) open 55-gallon drum was closed during the inspection

> Two (2) blue plastic 55-gallon drums of oily water, which were closed but unlabeled

Upon observing the nine (9) aforementioned unlabeled oil-contaminated material drums, the inspector recommended that Mr. Sills properly label the nine (9) drums.

Upon observing the interior of the box truck, the inspector noted that the ceiling of the box truck was damaged, as - according to the observations of the inspector - certain parts of the box truck ceiling were perforated with holes. Therefore, according to the observations of the inspector, the damaged ceiling of the box truck will not provide adequate protection to any used oil filter drums that will be stored within the truck in the future from the elements, as rainwater was observed to be accumulating on the lids of some of the 55-gallon drums observed during the inspection.

Inspection Date: 06/08/2018

In addition, the inspector noted that the floor of the box truck was constructed of wooden planks, between which - according to the observations of the inspector - there appeared to be small gaps. Therefore, the inspector determined that the floor of the box truck is not an oil-impermeable surface on which any used oil filter drums can be properly stored in the future.

On the box truck, EGWRS maintain certain safety and emergency response equipment, which is readily available to any EGWRS personnel for use during an oil-contaminated material emergency. More specifically, the inspector observed one (1) fire extinguisher on the floor next to the driver's seat of the box truck.

However, the inspector also noted that EGWRS personnel had not placed any unused spill pads on the box truck. In turn, the inspector recommended to Mr. Sills that EGWRS personnel place some unused spill pads onto the box truck (so that EGWRS box truck drivers will be equipped with the necessary safety equipment to respond to any oil-contaminated material spills that may occur within and/or in the immediate vicinity of the box truck).

During the inspection, Mr. Sills informed the inspector that the facility's other box truck was conducting oil-contaminated solid pick-ups from EGWRS' customers, and was thus not present on-site at the time of the inspection. However, according to Mr. Sills, this one (1) box truck is operated in the same manner as the one (1) box truck that was observed on-site by the inspectors during the inspection. Therefore, the inspector determined that the used oil filter storage procedures implemented within the facility's second box truck also did not comply with the used oil filter storage standards required of Used Oil Filter Transfer Facilities.

>> RECORD REVIEW <<

> Acceptance and delivery records for the facility's oily water transport activities from the past three (3) years were available for review. More specifically, Mr. Sills provided the inspector with a representative sample of five (5) used oil acceptance and delivery records (dated between 03/15/2015 and 06/02/2018).

According to the facility's oily water acceptance and delivery records, all of the oily water transported by EGWRS is transported to Cliff Berry, Inc. (EPA ID # FLD058560699), a facility in Miami that is authorized by the Department to operate as a Used Oil Processor.

According to the facility's most recent oily water acceptance and delivery record that was provided to the inspectors for review (dated 06/02/2018), EGWRS transported a total of 6,000 gallons of oily water (which - according to the disposal record - was generated by one [1] of EGWRS' ocean vessel customers) to Cliff Berry, Inc. (EPA ID # FLD056560699) for further processing.

However, upon further reviewing the five (5) aforementioned used oil acceptance and delivery records, the inspector noted that the facility's business address was not listed on any of the used oil acceptance and delivery records.

During the inspection, Mr. Sills informed the inspectors that EGWRS personnel do not conduct any halogen content testing on the oily water transported by the facility's various transport trucks to Cliff Berry, Inc. - Miami, as - prior to transporting any oily water shipments from a customer - EGWRS requires all new customers to complete and submit a waste profile for the oily water generated in their ocean vessels to EGWRS. More specifically, Mr. Sills informed the inspectors that this waste profile documentation demonstrates that the oily water removed from EGWRS customers' ocean vessels does not exhibit any hazardous characteristics or contain any hazardous waste and can therefore be transported and disposed of as non-hazardous oily water. In addition, Mr. Sills informed the inspectors that - once received from the facility's ocean vessel customers - the completed waste profiles are then sent to CBI - Miami for review.

During the inspection, Mr. Sills provided the inspectors with one (1) blank copy of the waste profile documentation that is provided to every EGWRS customer, which appeared to be complete and in-order. Furthermore, Mr. Sills informed the inspectors that all of the oily water waste profiles that have been provided to EGWRS by the facility's customers over the past three (3) years are maintained at CBI - Miami (i.e. as a part of CBI - Miami's records). Therefore, the waste profile documentation provided by EGWRS' customers over the past three (3) years was not available on-site for review.

> According to Mr. Sills, all used oil filters, oily rags, and used oil absorbents picked up from EGWRS' customers by EGWRS' two (2) box trucks are recorded on the same acceptance records as those used for

Inspection Date: 06/08/2018

the oily water shipments. More specifically, Mr. Sills informed the inspectors that these used oil filter, oily rag, and used oil absorbent shipments may be listed either along with an oily water shipment provided by an EGWRS customer on the same acceptance record or on a separate acceptance record (i.e. depending on the recordkeeping preferences of the EGWRS customer). Therefore, the inspector determined that the facility's used oil filter acceptance records also do not list EGWRS' business address.

However, a representative sample of the facility's used oil filter, oily rag, and used oil absorbent acceptance records from the past three (3) years was not provided to the inspectors for review.

The facility's 2016, 2017, and 2018 used oil filter, oily rag, and used oil absorbent delivery records were available for review. More specifically, Mr. Sills provided the inspectors with seven (7) used oil filter, oily rag, and used oil absorbent delivery records (dated between 07/07/2016 and 05/01/2018), all of which appeared to be complete and in-order. However, the inspector noted that a representative sample of the facility's 2015 used oil filter, oily rag, and used oil absorbent delivery records were not provided for review.

According to the EGWRS used oil filter, oily rag, and used oil absorbent records provided by Mr. Sills, all used oil filters, oily rags, and used oil absorbents transported/generated by EGWRS' two (2) box trucks are transported to Wheelabrator South Broward Inc. (EPA ID # FLR000169292), a facility in Fort Lauderdale that is authorized by the Department to operate as a oil-contaminated material Waste-to-Energy Facility.

According to the facility's most recent used oil filter, oily rag, and used oil absorbent acceptance and delivery record that was provided to the inspectors for review (dated 05/01/2018), EGWRS transported a total of 1,820 pounds (or approximately 826 kilograms) of used oil filters, oily rags, and/or used oil absorbents to Wheelabrator South Broward Inc. for proper disposal.

> The facility's 2016, 2017, and 2018 Used Oil Annual Reports were available for review. However, according to the Department's records, the facility's 2015 Used Oil Annual Report appears to have never been submitted to the Department for review.

According to the facility's most recent Used Oil Annual Report (dated 2017, and filed with the Department on 02/27/2018), EGWRS accepted a total of 5,720 gallons of "mixed" oily water between January 1, 2017 and December 31, 2017 for transport in the facility's various transport trucks, which then "transferred" the entire quantity of this "mixed" oily water "to another facility for storage or processing."

In addition, the facility's 2017 Used Oil Annual Report indicated that EGWRS accepted a total of 8,500 used oil filters between January 1, 2017 and December 31, 2017 for transport in the facility's two (2) box trucks, which then "transferred" all of the used oil filters "to another registered facility." Furthermore, the facility's 2017 Used Oil Annual Report indicated that EGWRS accepted a total of 3,850 gallons of "oily waste" (i.e. oily rags and used oil absorbents) between January 1, 2017 and December 31, 2017 for transport in the facility's two (2) box trucks, which then "transferred" the entire quantity of this "oily waste ... to another registered facility."

However, upon further reviewing the facility's 2016 and 2017 Used Oil Annual Reports, the inspector concluded that the quantities of oily water listed on the Annual Reports appeared to be inaccurate, as - according to the facility's oily water disposal records provided to the inspector for review - EGWRS appeared to transport considerably more than 8,000 gallons of oily water in 2016 and considerably more than 5,720 gallons of oily water in 2017.

> Records of the facility's Used Oil Handler Certification of Liability Insurance forms from the past three (3) years were also available for review.

According to the facility's most recent Used Oil Handler Certification of Liability Insurance form, EGWRS has purchased the following insurance package:

* Policy # BAP 0274662-00 (issued on 12/31/2017, and set to expire on 12/31/2018) - provided by Zurich American Insurance Company

According to the observations of the inspector, the insurance package outlined in the facility's most recent Certification of Liability Insurance form appeared to be up-to-date and to meet the Department's minimum liability insurance coverage requirements.

Inspection Date: 06/08/2018

> According to Mr. Sills, all employees responsible for handling oily water, oily bilge water, used oil filters, oily rags, and/or used oil absorbents receive an initial 40-hour HAZWOPER training and an annual 8-hour HAZWOPER refresher training, both of which include training concerning the facility's proper oily water and oil-contaminated material handling, storage, and spill response procedures. In addition, Mr. Sills informed the inspectors that monthly safety meetings with all EGWRS employees responsible for handling oil-contaminated material waste are conducted.

Records of the EGWRS' employee training records were available for review. More specifically, Mr. Sills provided the inspector with the most recent training 8-hour HAZWOPER training records (i.e. from 2018) and the initial 40-hour HAZWOPER training records for the six (6) employees responsible for handling oil-contaminated waste at the facility (all in the form of training complete certificates), all of which appeared to be complete and in-order. According to the six (6) employee training records provided by Mr. Sills, all EGWRS employees responsible for handling oil-contaminated material waste have received "HAZWOPER ... Training for hazardous waste site workers," which is provided by Cliff Berry, Inc. In addition, the facility's 2018 employee training records indicated that the most recent of these "HAZWOPER" training sessions had occurred on February 21, 2018, on which four (4) EGWRS completed an "8 HR HAZWOPER Refresher Training for hazardous waste site workers."

However, EGWRS' employee training records from 2016 and 2017 were not provided to the inspectors for review.

> The facility's Spill Prevention, Control, and Countermeasures (SPCC) Plan was available for review during the inspection.

During the inspection, Mr. Sills provided the inspectors with the facility's most up-to-date Facility Response Plan (last updated October 10, 2017), which is in compliance with the requirements of 33 CFR Part 154. Upon reviewing the facility's most recent Facility Response Plan, the inspectors noted that EGWRS have included a section on the facility's site-specific oil-contaminated material spill prevention and emergency response procedures within this Facility Response Plan. Therefore, according to the observations of the inspectors, the facility's Facility Response Plan appears to also be serving as the facility's site-specific SPCC Plan, and - as such - appears to be complete and in-order.

In addition, Mr. Sills informed the inspectors that the facility has drafted a Mobile Transfer Facility Operations Manual, which details EGWRS' site-specific oily water and oil-contaminated material handling, storage, and spill response procedures (along with the contact information for the emergency personnel that EGWRS personnel are supposed to contact during any potential oil-contaminated spill emergency). Furthermore, Mr. Sills informed the inspectors that a copy of this Mobile Transfer Facility Operations Manual has been placed on each of EGWRS' various transport trucks as a reference for EGWRS personnel during any potential oil-contaminated material spill emergency.

During the inspection, Mr. Sills also informed the inspectors that any large oil-contaminated material spills that cannot be adequately addressed by EGWRS personnel are addressed by Cliff Berry, Inc. - Port Everglades, who is contracted by EGWRS to coordinate the spill response efforts to any large spills that could occur as a result of EGWRS' oil-contaminated material transport operations.

> All DEP permits and forms were available for review, and were prominently displayed in an accessible location in the facility. More specifically, the facility most recent Used Oil and Used Oil Filter Transporter registration form (dated 02/27/2018, and set to expire on 06/30/2019) was prominently displayed in a frame that was mounted on a wall within the facility's one (1) office space.

However, according to the observations of the inspectors, the facility appears to regularly accumulate use oil filters in the truck staging and waste storage area for time periods of over ten (10) days. Therefore, the inspectors concluded that EGWRS has incorrectly registered with the Department, as - in addition to operating as a Used Oil Transporter and a Used Oil Filter Transporter - the facility is operating as a Used Oil Filter Transfer Facility.

> Records of the facility's United States Department of Transportation (USDOT) Hazardous Materials Certificates of Registration were also available for review. More specifically, the inspectors observed that the facility's most recent USDOT Hazardous Materials Certificate of Registration (Registration # 062917 554 020Z; issued 07/01/2017, and set to expire on 06/30/2018) was prominently displayed in a frame placed on

Inspection Date: 06/08/2018

top of a filing cabinet situated in an accessible location of EGWRS' one (1) office space. According to the observations of the inspector, the facility's most recent USDOT Hazardous Materials Certificate of Registration appeared to be complete and in-order.

During the inspection, the inspector recommended that EGWRS renew the facility's USDOT Hazardous Materials Certification of Registration, as - according to the most recent USDOT Hazardous Materials Certificate of Registration that was displayed in the one (1) office space - the facility's current USDOT Hazardous Materials Certification of Registration was set to expire approximately two (2) weeks after the dated of the inspection (i.e. on 06/30/2018).

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.510(5)
Explanation:	<p>According to the Department's records, the facility failed to submit EGWRS' 2015 Used Oil/Used Oil Filter Annual Report to the Department for review.</p> <p>In addition, according to the observations of the inspector, the facility's Used Oil/Used Oil Filter Annual Reports from 2016 and 2017 appeared to be inaccurate, as the facility appears to have transported considerably more oily water, used oil filters, oily rags, and used oil absorbents in 2016 and 2017 than are listed on the Annual Reports that were submitted to the Department.</p>
Corrective Action:	Please submit (via email) versions of the facility's 2015, 2016, and 2017 Used Oil/Used Oil Filter Annual Reports that accurately list the quantities of used oil, used oil filters, oily rags, and used oil absorbents that the facility transported over the past three (3) years to the Department for review.
<hr/>	
Type:	Violation
Rule:	62-710.850(3)
Explanation:	<p>According to the observations of the inspectors, the facility appears to regularly accumulate used oil filters for time periods of over ten (10) days.</p> <p>Therefore, the facility failed to register with the Department as a Used Oil Filter Transfer Facility.</p>
Corrective Action:	Please submit (via email) an updated Used Oil Registration Form that indicates that the facility is operating as a Used Oil Filter Transporter and a Used Oil Transfer Facility to the Department for review.
<hr/>	
Type:	Violation
Rule:	279.46(a), 279.46(b), 62-710.510(1)
Explanation:	<p>The facility's oily water acceptance and delivery records and used oil filter acceptance records do not list EGWRS' business address.</p> <p>Furthermore, the facility's used oil filter delivery records do not provide Wheelabrator South Broward Inc.'s specific EPA ID number, the quantity of used oil filters provided for disposal, the date of EGWRS' delivery of the used oil filters to Wheelabrator South Broward Inc. Furthermore, the facility's used oil filter delivery records do not provide the handwritten name and dated signature of the representative of Wheelabrator South Broward Inc. that accepted the used oil filter shipments for proper disposal.</p>
Corrective Action:	Please edit the facility's oily water acceptance and delivery records and used oil filter

Inspection Date: 06/08/2018

acceptance records in a manner that lists EGWRS' business address.

Please also edit the facility's used oil filter delivery records in a manner that includes all of the aforementioned required information.

Please then submit (via email) the facility's used oil and used oil filter acceptance and delivery records from the next two (2) weeks that now include all of the aforementioned required information.

Type:	Violation
Rule:	279.44(d)
Explanation:	The facility failed to maintain the oily water waste profile documentation completed and submitted by EGWRS' customers over the past three (3) years on-site.
Corrective Action:	Please acquire the oily water waste profile documentation completed and submitted by EGWRS' customers over the past three (3) years from Cliff Berry, Inc. - Miami Terminal. Please then submit (via email) a representative sample of the oily water waste profile documentation completed and submitted by EGWRS' customers to the Department for review. Please also begin maintaining on-site copies of all oily water waste profile documentation that is completed/submitted by EGWRS' customers.

Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	The facility did not provide the 2016 and 2017 used oil employee training records for the six (6) EGWRS employees responsible for handling used oil at the facility.
Corrective Action:	Please acquire and submit (via email) the 2016 and 2017 used oil employee training records for the six (6) EGWRS employees responsible for handling used oil at the facility to the Department for review.

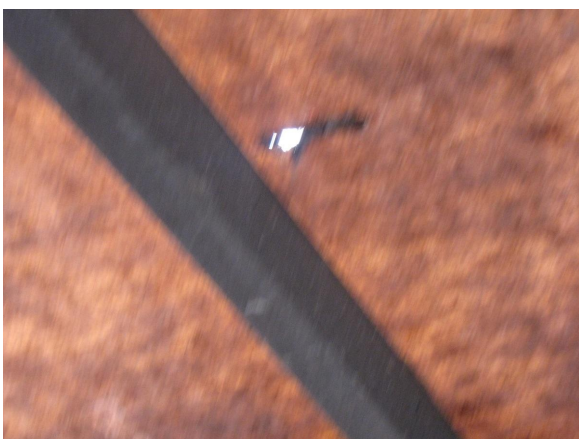
Type:	Violation
Rule:	62-710.500(1)
Explanation:	According to the observations of the inspector, the property on which the facility's office space operates and the property on which the facility's oil-contaminated material transport/temporary storage operations are conducted are not contiguous, as the two (2) properties are separated by a highway and a wooded area. Therefore, the inspector determined that - on the facility's 2018 Used Oil Registration form - EGWRS' mailing address was incorrectly listed as PO Box 22490, Fort Lauderdale, FL 33335. In addition, the inspector determined that EGWRS' site address was incorrectly listed as 701 SE 32nd Court, Suite 201, Fort Lauderdale, FL 33314-4133 on the facility's 2018 Used Oil Registration form.
Corrective Action:	Please submit an updated 2018 Used Oil Registration form that correctly lists the facility's mailing address as 701 SE 32nd Court, Suite 201, Fort Lauderdale, FL 33314-4133 and the facility's site address as 3400 SE 9th Avenue, Fort Lauderdale, FL 33316, Suite B (i.e. as a means of indicating that EGWRS' used oil/used oil filter transport/transfer activities occur on a portion of the Cliff Berry - Port Everglades Facility property that is operated independently of Cliff Berry - Port Everglades Facility).

Inspection Date: 06/08/2018

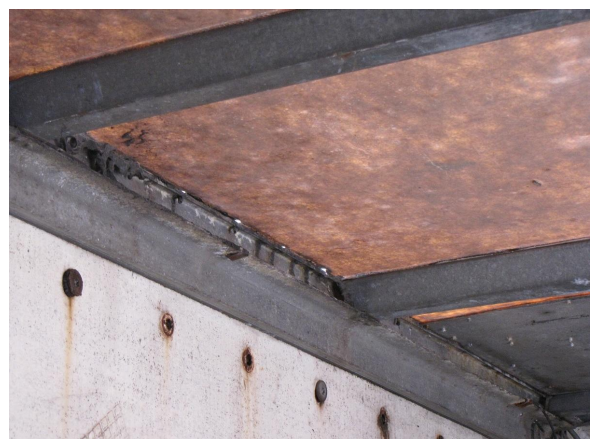
Type:	Violation
Rule:	62-710.850(5)(a)
Explanation:	<p>While no used oil filter storage containers were observed to be accumulating on-site during the inspection, the inspector determined that the facility's used oil filter storage procedures do not comply with the used oil filter storage standards required of Used Oil Filter Transfer Facilities.</p> <p>More specifically, the inspector noted that the damaged ceiling of the one (1) box truck that was present on-site during the inspection will not serve as adequate protection from the elements for any used oil storage drums that will be temporarily stored in the facility's box truck.</p> <p>In addition, the inspector determined that the floor of the one (1) box truck present on-site during the inspection is not an oil-impermeable surface on which used oil filter containers can be properly stored, as - according to the observations of the inspector - noticeable gaps exist between the interconnected wooden planks that serve as the floor of the box truck.</p>
Corrective Action:	<p>Please repair the ceiling of the one (1) box truck in a manner that ensures that adequate weather protection will be provided for any used oil filter storage drums that will be stored within the box truck.</p> <p>Please then submit photographs (via email) illustrating that the ceiling of the one (1) box truck has been adequately waterproofed (i.e. repaired in a manner that will prevent rainwater from entering the interior of the box truck).</p> <p>In addition, please submit photographs (via email) demonstrating that the ceiling of the second box truck that was not present on-site during the inspection also has an undamaged and/or repaired ceiling that will protect any used oil filter storage drums accumulating within the box truck from the elements.</p> <p>Furthermore, please construct/install an oil-impermeable floor within the two (2) box trucks that will serve as the oil-impermeable surface upon which used oil filter containers can be properly stored.</p> <p>Lastly, please submit photographs (via email) that an oil-impermeable floor has been constructed/installed within the two (2) box trucks.</p>

Photo Attachments:

View 1 of Damaged Box Truck Ceiling



View 2 of Damaged Box Truck Ceiling



Inspection Date: 06/08/2018

Rainwater Accumulating on Lid of Used Oil Absorbent Drum



View 1 of Inadequately Oil-Impermeable Box Truck Floor



View 2 of Inadequately Oil-Impermeable Box Truck Floor



PHOTO ATTACHMENTS:

Oily Water Tanker Truck



Door of Oily Water Tanker Truck



Inspection Date: 06/08/2018

Oily Water Drip Pan on Oily Water Tanker Truck



Flex Booms Placed on Oily Water Taker Truck



Spill Pads and Unused Oil Spill Pads on Oily Water Tanker Truck



Oily Water Transfer Valve/Hose Spill Bucket



Oily Water Vacuum Truck



Door of Oily Water Vacuum Truck



Inspection Date: 06/08/2018

Oil-Contaminated Material Box Truck



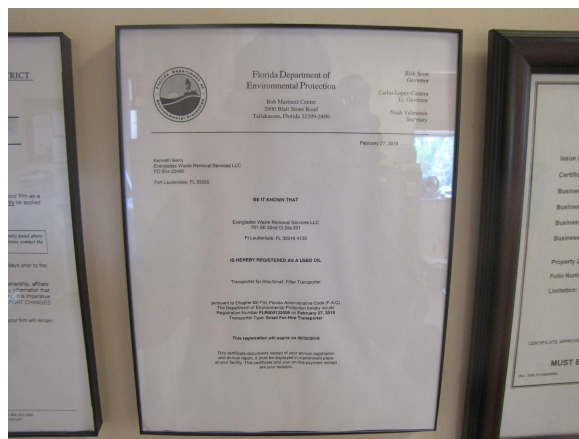
Door of Oil-Contaminated Material Box Truck



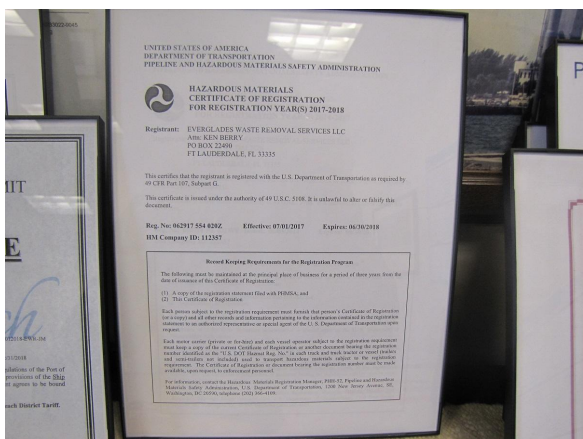
Fire Extinguisher on Oil-Contaminated Material Box Truck



DEP Used Oil Registration Form Posted in Office Space



Posted USDOT Hazardous Materials Certificate of Registration



Conclusion:

According to the observations of the inspector, EGWRS transports (via tanker truck and box truck) and temporarily stores (i.e. for time periods of between twenty-four [24] hours and thirty-five [35] days) oily water and oily bilge water. Therefore, the facility appears to be operating as a Used Oil Transporter. In addition, according to the observations of the inspector, EGWRS transports (via box truck) and temporarily stores (i.e. for time periods of greater than ten [10] days) used oil filters, oily rags, and used oil absorbents. Therefore, the facility also appears to be operating as a Used Oil Filter Transporter and a Used Oil Filter Transfer Facility. Lastly, the facility has the potential to generate less than 5,000 kilograms (or approximately 11,024 pounds) of spent fluorescent lamps per year. Therefore, the facility also appears to be operating as a Small Quantity Handler (SQH) of universal waste. All records required of Used Oil Transporters, Used Oil Filter Transporters/Transfer Facilities, and Small Quantity Handlers were reviewed by the inspectors, and seven (7)

Inspection Date: 06/08/2018

potential noncompliance issues were observed.

At the end of the 06/08/2018 inspection, an exit interview was provided to Mr. Sills by the inspectors. In the exit interview, the inspector requested that the facility resolve all of the potential noncompliance issues observed during the inspection by undertaking and submitting documentation of the necessary corrective actions within fifteen (15) days of the inspection.

In addition, the inspector requested that the facility provide a representative sample of the facility's oily water and used oil filter/oily rag/used oil absorbent acceptance and delivery records, the facility's most up-to-date employee training records, and a copy of the facility's Mobile Transfer Facility Operations Manual, all of which were not reviewed on-site during the inspection due to time constraints. Lastly, the inspector recommended that Mr. Sills update EGWRS' USDOT Hazardous Materials Certificate of Registration, which - according to the observations of the inspector - was due for renewal on 06/30/2018 (i.e. approximately three [3] weeks after the inspection).

On 06/11/2018, Mr. Sills submitted (via email) the following documentation to the inspector for review:

- > A copy of the facility's Mobile Transfer Facility Operations Manual
- > Five (5) oily water acceptance and delivery records (dated between 2015 and 2018)
- > The 2018 employee training records for the six (6) EGWRS employees responsible for handling oil-contaminated material waste at the facility
- > Documentation indicating that Mr. Sills had submitted an application to renew EGWRS' USDOT Hazardous Materials Certificate of Registration

On 06/11/2018, Mr. Sills also submitted (via email) photographs indicating that the following actions had been undertaken:

- > The seven (7) 55-gallon oily rag and used oil absorbent storage drums observed within the box truck during the inspection had been labeled with the words "Used Oily Pads/Rags"
- > The two (2) 55-gallon oily water drums had been labeled with the words "Oily Water"

On 07/26/2018, the inspector contacted Mr. Sills (via email) and requested that the facility undertake and submit documentation of the corrective actions that needed to be undertaken in order to resolve the remaining open noncompliance issues. In addition, the inspector requested that the facility submit (via email) additional EGWRS oily water acceptance and delivery records to the inspector for review (so that a representative sample of the facility's oily water acceptance and delivery records could be properly reviewed by the Department).

On 08/02/2018, EGWRS submitted (via email) the following documentation to the Department for review:

- > Five (5) used oil filter/oily rag/used oil absorbent delivery records (dated between 2015 and 2018)

On 08/03/2018, EGWRS submitted (via email) the following documentation to the Department for review:

- > Six (6) 40-hour HAZWOPER training completion certificates (dated between 1991 and 2017) for EGWRS employees responsible for handling oil-contaminated waste at the facility

On 08/03/2018, the inspector contacted Mr. Sills (via email) and requested that EGWRS submit the facility's employee training records and a representative sample of the facility's used oil filter acceptance records to the Department for review.

Upon further reviewing the facility's oily water transport activities on 08/15/2018, the inspector determined that the facility only transports/temporarily stores oily water and is therefore not required to register with the Department as a Used Oil Transfer Facility. However, the inspector will inform Mr. Sills that all oily water transported from EGWRS customers' ocean vessels to CBI - Miami for proper disposal must have accompanying waste profile documentation that demonstrates that the oily water shipments do not exhibit any hazardous characteristics or contain any hazardous constituents. Furthermore, the inspector will inform Mr. Sills that any oily water shipments that have not been profiled by the aforementioned waste profile documentation must be handled by EGWRS in accordance with all of the used oil transport/temporary storage standards required of Used Oil Transporters and Used Oil Transfer Facilities.

Inspection Date: 06/08/2018

Inspection Date: 06/08/2018

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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 06/08/2018

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.

Daniel G Lopez

Principal Inspector Name

Environmental Specialist I

Principal Inspector Title
Principal Inspector Signature

DEP

Organization

08/16/2018

Date

David Maloney

Inspector Name

Environmental Specialist II

Inspector Title

DEP

Organization

David Sills

Representative Name

Project Manager

Representative TitleEverglades Waste Removal Services
LLC**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:

08/16/2018