



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

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**FACILITY INFORMATION:**

**Facility Name:** CleanPro Enviro Solutions LLC

**On-Site Inspection Start Date:** 07/26/2018

**On-Site Inspection End Date:** 07/26/2018

**ME ID#:** 125495

**EPA ID#:** FLR000223503

**Facility Street Address:** 17302 Pines Blvd, Pembroke Pines, FL 33029-1507

**Contact Mailing Address:** 17302 Pines Blvd, Pembroke Pines, FL 33029

**County Name:** Broward

**Contact Phone:** (954) 203-2206

**NOTIFIED AS:**

Non-Handler

Transporter

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Universal Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kayla Acosta, Inspector

Other Participants: Johnny Laguna, Operations Manager

**LATITUDE / LONGITUDE:** Lat 26° 0' 26.0748" / Long 80° 22' 42.1788"

**SIC CODE:** 4213 - Trans. & utilities - trucking, except local

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A Compliance Evaluation Inspection (CEI), was conducted at CleanPro Enviro Solutions LLC (CleanPro) which is a subsidiary of Waste Pro USA. The inspection was performed on 07/26/2018 by ES I inspector Kayla Acosta. CleanPro specializes in the services of managing and disposing of household hazardous waste and used oil from city-owned collection centers and events. CleanPro was represented by Johnny Laguna, Operations Manager. The facility is approximately 15,000 square feet in size, has 2 employees, and is on public water and sewer. The facility has been in operation since January 2017.

**Notification history:**

06/22/2017 - Notified as a HW Transporter/ UO Transporter/ UO Filter Transporter/ UW Transporter/ UW Transfer Facility

Their current registration is active for: HW Transporter (expiration date: 06/30/2019). UO Transporter, UO Filter Transporter (expiration date: 06/30/2019). UW Transporter and Transfer Facility (expiration date: 03/01/2019).

**Inspection history:**

Never Inspected by the Department.

PPE was required to enter this facility. Department personnel was equipped with steel toe boots.

**Process Description:**

CleanPro manages and coordinates disposal of household hazardous waste at collection centers in city-owned locations throughout Broward County. The household hazardous waste collection events are held

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once a month on a Saturday. Waste that is collected at these events include household hazardous waste, household used oil, household universal waste, electronic waste, and household universal waste.

CleanPro subcontracts Stericycle Specialty Waste Solutions (EPA ID MNS000110924) to pick up and dispose of the household hazardous waste and universal waste at the city-owned household hazardous waste collection sites on the same day of the event. Household used oil is collected by CleanPro and picked up by a second transporter EMC Oil Corporation (EPA ID FLR000000166) no later than the next day. Although CleanPro is registered as a Universal Waste Transfer facility, it does not store any universal waste at the facility for more than 24 hours. The facility chooses to maintain its UW Transfer facility status for future operations.

The inspector toured the facility with Mr. Johnny Laguna and reviewed UO, UW, HW transporter practices and records.

The facility has one (1) truck.

> One (1) - 15,000 pound capacity - Boxed Truck - 2007 International DuraStar 4400

DOT placards were displayed (US DOT# 1002696 FL) on the sides of the truck, and the transporters keep copies of the permits, notifications, contingency plan (in case of emergency) and manifests on the truck. Also, the trucks are properly identified for their corresponding wastes and have fire extinguishers and spill kits available on site.

#### Record Review:

A) Transport, receiving and shipping records were available for review at the time of inspection. The facility has maintained records since the start of operation in 2017 and was advised to retain all records of transportation and training for 3 years. The facility was not using an equivalent form [62-710.901(2)]. It was noted on the non-hazardous waste manifests that CleanPro was not including the halogen screening process for used oil. The generator ID is not required in shipment records for public used oil collection centers as cited in 40 CFR 279.20(1)(a)(1); therefore CleanPro is exempt from having to include the generator EPA ID on the non-hazardous waste manifest. CleanPro collects household waste from city-owned household hazardous waste collection centers. Non-hazardous waste manifests were available for used oil and used oil filters which is then picked up by EMC Oil Corporation (EPA ID FLR000000166) and sent to an oil refinery named Noble Oil Services, Inc. (EPA ID NCD986172476) in Sanford, North Carolina. Last shipment of UO and UO filters was on 07/20/2018.

B) Manifest records were available for review for UW and HW. HW and UW gets picked up at the event by Stericycle Specialty Waste Solutions, Inc. (EPA ID MNS000110924). It is then transported by Freehold Cartage Inc. (EPA ID NJD054126164) to its final destination Allworth, LLC (EPA ID ALD094476793) in Birmingham, Alabama. The last pick up of HW and UW from from a household waste collection event was on 07/14/2018. Although CleanPro subcontracts Stericycle to transport and dispose of HW, Clean Pro must be aware that if they act as a primary or secondary transporter, the EPA ID of the generator must be included in the HW manifest.

C) Insurance Liability - The facility provided the Department a letter of self-insurance provided and certified by Waste Pro USA's Chief Financial Officer Cort Sabina and supports the use of provision 62-710.600(2)(e)(b) F.A.C. for automobile liability and pollution liability in the amount of \$1,000,000 dated 05/02/2018.

D) Employee Training - The facility provided the driver's license of the transporter which has an X endorsement to demonstrate hazardous materials and tanker certification. However, the facility could not provide annual training documentation as required in 62-710.600(2)(c). The Department of Transportation also requires hazardous waste transporters to train, test, certify, and maintain of current training for each of their employees as cited in 49 CFR 171.8 and 172.704.

E) Halogen Screening Procedure - The facility was not testing for used oil halogen contents which is a used oil transporter requirement as cited in 40 CFR 279.44. Instead, the halogen content is tested when the second transporter EMC Oil Corporation picks up the Used Oil. Halogen screening is not required if the pick up is less than 55 gallons.

F) The facility provided a SPCC plan and an Emergency Action plan for Used Oil and hazardous waste which contained the emergency coordinator, emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures.

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G) Permits - In a binder was the following:

>FLDEP UW Transporter Registration Exp. 03/01/2019

>FLDEP HW Transporter Certificate of Approval and HW Transporter Registration Exp. 06/30/2019.

>FLDEP UO Transporter, UO Filter Transporter Exp. 06/30/2019.

H) The facility submitted their UO Annual Report on 04/24//2018.

## New Potential Violations and Areas of Concern:

### Violations

Type: Violation

Rule: 279.44(a), 279.44(b)(1), 279.44(d), 62-710.901

Explanation: To ensure that used oil is not a hazardous waste under the rebuttable presumption of §279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm. The facility does not conduct halogen screenings on the used oil collected; therefore they do not document or keep records for halogen screenings. However, the secondary transporter EMC was conducting halogen screening prior to pickup from Clean Pro.

Corrective Action: The facility must begin testing the used oil it collects from collection centers in order to evaluate halogen content. If total halogen content is equal to or greater than 1,000 ppm, then the facility must manage the used oil as hazardous waste. The facility must provide documentation and proof of halogen testing.

\*\*\*Violation Corrected 08/17/18. Going forward, CleanPro has made arrangements with their subcontracted vendor, Stericycle Specialty Waste Solutions, to collect, test for Halogens, and transport all used oil at the household hazardous waste events. An email correspondence confirming these changes has been received by the Department A photo of Halogen testing being conducted at a household hazardous waste event was sent to the Department on 08/22/2018.

### Photo Attachments:

Halogen Testing at HHW Event



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Type: Violation

Rule: 62-710.600(2)(b)

Explanation: The facility must show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a certification that the used oil

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transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, and has an annual and new employees training program in place covering the applicable rules. The facility must also maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections.

Corrective Action: During the inspection the training records were not available for review.

\*\*Violation corrected on 08/21/2018. The facility provided a training log for Hazard Communication and Spill Response for all drivers demonstrating that CleanPro was up to date on training. Last training was on 01/19/2018.

Photo Attachments:

Training Log

WASTE PRO		WASTE PRO TRAINING ATTENDANCE FORM	
Training Title: HAZARDOUS COMMUNICATION & Spill Response		Minimum Daily-40MIN/HR	
Training Topic covered: HAZARDOUS Spill Response			
Date: 1-19-2018		Time: 6:05 AM	
Location: 101		Instructor: Lenny / Chris Perry	
Trainee Name:		Trainee Signature:	
1	John Brown		
2	St. John Brown		
3	John Brown		
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PHOTO ATTACHMENTS:

Transporter Truck



Spill Kit



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Central Accumulation Area for UO, Latex Paint (Empty Containers)



Non-HW Manifest from House Hold HW Collection Event

NON-HAZARDOUS WASTE MANIFEST

Manifest Number: 20180726-1

Generator: CLEANPRO ENVIRO SOLUTIONS, LLC

Transporter: CLEANPRO ENVIRO SOLUTIONS, LLC

Destination: CLEANPRO ENVIRO SOLUTIONS, LLC

Quantity: 5 55 GAL

Material: 55 GAL DRUMS

Container: 6 (6)

Signature: [Signature]

Date: 07/26/18

Used Oil Shipment Document

UNIFORM WASTE TRANSPORTER'S MANIFEST

Manifest Number: 20180726-1

Generator: CLEANPRO ENVIRO SOLUTIONS, LLC

Transporter: CLEANPRO ENVIRO SOLUTIONS, LLC

Destination: CLEANPRO ENVIRO SOLUTIONS, LLC

Quantity: 5 55 GAL

Material: 55 GAL DRUMS

Container: 6 (6)

Signature: [Signature]

Date: 07/26/18

Conclusion:

CleanPro Enviro Solutions LLC operates as a HW Transporter/ UO Transporter/ UO Filter Transporter/ UW Transporter/ UW Transfer Facility. The facility was not in compliance with state and federal hazardous waste regulations.

The facility was asked to provide annual hazardous waste and used oil training documentation for the last three years for transporters. The facility was also instructed to immediately begin conducting halogen screenings of their used oil that is picked up at the household collection events and document results using an equivalent form [62-710.901(2)]. If used oil is detected to have halogen levels equal to or greater than 1,000 ppm, the used oil must be managed as hazardous waste. The Department asked for documentation of halogen screenings and gave the facility 14 days to comply.

Empty Drums



HW Manifest from House Hold HW Collection Event

HAZARDOUS WASTE MANIFEST

Manifest Number: 20180726-1

Generator: CLEANPRO ENVIRO SOLUTIONS, LLC

Transporter: CLEANPRO ENVIRO SOLUTIONS, LLC

Destination: CLEANPRO ENVIRO SOLUTIONS, LLC

Quantity: 5 55 GAL

Material: 55 GAL DRUMS

Container: 6 (6)

Signature: [Signature]

Date: 07/26/18



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The facility submitted training records on 08/21/2018 for all employees handling used oil and hazardous waste. Training is conducted annually. Last training was held 01/19/2018. For halogen testing of used oil, CleanPro has made arrangements going forward for their vendor Stericycle Specialty Waste Solutions to collect, test, and transport used oil from the household hazardous waste events. CleanPro submitted the email correspondence confirming the new arrangement to the Department and began implementation on 08/18/2018. CleanPro has decided to maintain its status as a Used Oil transporter incase they do decide to handle used oil in the future and will be implement halogen testing.

The facility has returned to compliance as of 08/21/2018.

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**6.0 - Transporters Checklist****Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

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

Item No.	Transporter Requirements	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)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG 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)	✓		
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)	✓		
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)			✓

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Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)	✓		
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)	✓		
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)	✓		
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31	✓		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		



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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Kayla Acosta

**Principal Inspector Name**

Inspector

**Principal Inspector Title****Principal Inspector Signature**

DEP

**Organization**

08/30/2018

**Date**

Johnny Laguna

**Representative Name**

Operations Manager

**Representative Title**

Clean Pro Enviro Solutions

**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:**

08/30/2018