

**From:** [Blandin, Norva](#)  
**To:** [Acosta, Kayla](#)  
**Subject:** FW: Case Classification Review: CleanPro Enviro Solutions LLC EPA ID FLR000223503  
**Date:** Thursday, August 30, 2018 2:05:29 PM  
**Attachments:** [CleanPro Harm Ranking.xlsx](#)  
[image002.png](#)  
[CCR CleanPro\\_slh.pdf](#)  
[Revised CleanPro IR\\_Slh.pdf](#)  
**Importance:** High

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Kayla

Please submit the inspection report, and all DMA's associated with this case.

Best regards,



**Norva Blandin, MSEM**  
**Environmental Manager**  
**Compliance Assurance Program (CAP)**  
Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[Norva.Blandin@floridadep.gov](mailto:Norva.Blandin@floridadep.gov)  
Office: 561.681.6728  
Main: 561.681.6600  
Fax: 561-681-6755

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**From:** Horlick, Susan  
**Sent:** Thursday, August 30, 2018 10:01 AM  
**To:** Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>  
**Cc:** Perrigan, Glen <[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>; Fisch, Ben <[Ben.Fisch@dep.state.fl.us](mailto:Ben.Fisch@dep.state.fl.us)>; Barrett, Zachary <[Zachary.Barrett@dep.state.fl.us](mailto:Zachary.Barrett@dep.state.fl.us)>; Walker, Kim (Waste) <[Kim.Walker@FloridaDEP.gov](mailto:Kim.Walker@FloridaDEP.gov)>; Bahr, Tim <[Tim.Bahr@FloridaDEP.gov](mailto:Tim.Bahr@FloridaDEP.gov)>  
**Subject:** FW: Case Classification Review: CleanPro Enviro Solutions LLC EPA ID FLR000223503  
**Importance:** High

Norva,

The Division conducted a Case Specific Classification Review for CleanPro Enviro Solutions LLC EPA ID FLR000223503. At this time, the Division concurs with the District that formal enforcement is not appropriate. Contact me if you have questions or comments.

*Susan Horlick*

**FL Department of Environmental Protection**  
**Permitting and Compliance Assistance**  
**850-245-8778**  
[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)

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**From:** Perrigan, Glen

**Sent:** Tuesday, August 28, 2018 9:32 AM

**To:** Horlick, Susan <[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)>

**Cc:** Barrett, Zachary <[Zachary.Barrett@dep.state.fl.us](mailto:Zachary.Barrett@dep.state.fl.us)>; Fisch, Ben <[Ben.Fisch@dep.state.fl.us](mailto:Ben.Fisch@dep.state.fl.us)>; Acosta, Kayla <[Kayla.Acosta@FloridaDEP.gov](mailto:Kayla.Acosta@FloridaDEP.gov)>; Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>

**Subject:** FW: Case Classification Review: CleanPro Enviro Solutions LLC EPA ID FLR000223503

**Importance:** High

Susan,

Please follow up with a case review. Glen

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**From:** Blandin, Norva

**Sent:** Tuesday, August 28, 2018 9:26 AM

**To:** Perrigan, Glen <[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>; Fisch, Ben <[Ben.Fisch@dep.state.fl.us](mailto:Ben.Fisch@dep.state.fl.us)>; Barrett, Zachary <[Zachary.Barrett@dep.state.fl.us](mailto:Zachary.Barrett@dep.state.fl.us)>

**Cc:** Acosta, Kayla <[Kayla.Acosta@FloridaDEP.gov](mailto:Kayla.Acosta@FloridaDEP.gov)>

**Subject:** Case Classification Review: CleanPro Enviro Solutions LLC EPA ID FLR000223503

Good afternoon Glen and et.al:

The facility was in a state of minor out-of-compliance at the time of the inspection, and two violations were observed. Some of the violations has been resolved but the facility did not returned to compliance.

Today is **day 33**; **our expectation is to close inspection report before day 40.**

The District recommends that Compliance Assistance (CA) be pursued in this case. Facility was a recent transporter and never been inspected by the Department.



**Norva Blandin, MSEM**

**Environmental Manager**

**Compliance Assurance Program (CAP)**

Florida Department of Environmental Protection

Southeast District – West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

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# Hazardous Waste Program

## CASE REVIEW FORM

Check Case Review Type: <input type="checkbox"/> Case Specific Classification Review  <input type="checkbox"/> Enforcement Case Review					
Current Date:		Inspection Date:		Inspector:	
EPA ID: _____  Facility Name: _____  Facility Address: _____  Reference Links: _____					
Alleged Violation Citation/Regulator Reference		Manual Guide	Potential for Harm	Extent of Deviation	Check All That Apply
1.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
2.	Assistance.				<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
3.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
4.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
5.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
6.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents

## Hazardous Waste Program CASE REVIEW FORM

Comments: (Optional)					
7.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
8.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
9.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
10.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					

DWM Notes:

Note: This staff assessment is preliminary and is designed to assist in the compliance review process, prior to final agency direction. Comments provided herein are not the final position of the Department and may be subject to revision, pursuant to additional information and/or further review.

<b>FACILITY NAME: CleanPro Enviro Solutions</b>							<b>Date: 08/17/2018</b>
<b>EPA ID No.: FLR000223503</b>							<b>Case #:</b>
Violation	Description	Nature of Waste	Amount of Waste	Discharge	People	Threat	Total Points
40 CFR 279.44(a), 279.44(b)(1), 279.44(d)	Used Oil Rebuttal Presumption	2	1	0	1	0	4
62-710.600(2)(b) F.A.C	Transporter Training	4	1	0	1	0	6
							0
							0
							0
							0
<b>Nature of Waste</b>							<b>Score</b>
High Hazard (acutely toxic or reactive)							6
Other HW/Universal Waste							4
Used Oil							3
Used Oil Filters							2
<b>Amount of Waste</b>							
> 5,000 kg/1,375 gal (25 drums) of Waste							8
1,000 to 5,000 kg/275 gal to 1,375 gal (5 to 25 drums) of Waste OR 2.2lbs or > of acutely toxic waste							5
>100 kg to 1,000 kg/25 gal to 275 gal (5 drums) OR <2.2lbs of acutely toxic waste							2
<100 kg /<25 gal of Waste							1
<b>Discharge</b>							
Discharge to surface water or off site discharge.							12
Discharge to ground water							10
Discharge to soil							8
Discharge to air or Impervious Surface/Containment							6
Discharge-de minimus cleanup per 62-780 FAC							2
No Discharge							0
<b>Potential Exposures</b>							
>1,000 people							4
101 - 1,000 people							3
10 - 100 people							2
<10 people							1
<b>Additional Threat Factors (select all that apply for a specific violation-Use if NO discharge observed) (use sliding scale 0 = no risk, 1-4 depending on severity)</b>							
Fire or Explosion Risk							0-4
Incompatible Waste Storage							0-4
Risk of Employee Exposure above PELs							0-4
Container Integrity							0-4
Inadequate Provisions for Detecting and Preventing Releases							0-4
SUBSTANTIAL (Major)			Above 20				
SIGNIFICANT (Moderate)			13-20				
MINIMAL (Minor)			Under 13				

Additional Threat Factors Examples:

Fire or Explosion Risk: Highest ranking = fire or explosion is imminent, waste stored near ignition or fuel source; Lowest ranking = no risk of fire or explosion.

## Harm and Potential for Harm Ranking System

Incompatible Waste Storage: Highest ranking = wastes stored inappropriately with incompatibles not physically separated; Lowest ranking = no incompatible waste storage.

Risk of Employee Exposure above PELs: Highest ranking = PELs above exposure limits; Lowest ranking = no risk of exposure. Note, facility's lack of ability to measure PEL if there is a potential issue should be considered.

Container Integrity: Highest ranking = Containers are compromised; Lowest ranking = no containers are compromised.

Inadequate Provisions for Detecting and Preventing Releases: Highest ranking = No containment, no inspections, high potential for release; Lowest ranking = inspections performed, low potential for releases.

Note: This guideline is intended to support Directive 923, the Guidelines for Characterizing Hazardous Waste Violations, and the violation matrix spreadsheet (Guidelines for Characterizing Hazardous Waste, Universal Waste, Used Oil and Drycleaning Violations) to facilitate a consistent way of categorizing Harm and Potential for Harm. In order to account for case-specific circumstances, the default scores for any particular category can be adjusted based on professional judgement to better match the unique site conditions and findings from the inspection or information provided in response to the inspection findings. To help foster consistency and supportable decisions, professional judgement that will result in deviation from the default scores should be discussed with the program office.