From:	Lopez, Daniel G
To:	dsills@egwrs.com
Cc:	Blandin, Norva
Subject:	FDEP Compliance Evaluation Inspection: Everglades Waste Removal Services, LLC (EPA ID # FLR000132506) - Request for Corrective Actions
Date:	Thursday, July 26, 2018 4:23:00 PM

Good Afternoon Mr. Sills:

Thank you very much again for submitting many of the requested photographs and much of the requested documentation.

However, there are still certain noncompliance issues that need to be resolved. I have included the corrective actions that need to be undertaken below:

1. Please repair the ceiling of the box truck that is used to store oil-contaminated material storage drums (e.g. oily water drums, used oil absorbent drums, and used oil filter drums)

- During the inspection, I noted that the ceiling of the box truck has a few holes in it, through which rainwater can enter into the box truck and accumulate on top of the storage drums stored within the truck

2. Please submit (via email) photographs illustrating that the ceiling of the box truck has been repaired in a manner that will protect all storage drums stored within the box truck from the elements

3. Please place a spill kit on the box truck

- This spill kit may take the form of unused used oil spill pads that are readily available for use by any EGWRS personnel in an oil-contaminated material scenario

4. Please submit (via email) photographs illustrating that a spill kit has been placed on the box truck

5. Please submit (via email) twelve (12) additional oily water acceptance and delivery records from the past three (3) years

- You may provide three (3) additional oily water acceptance and delivery records from 2015, 2016, 2017, and 2018 (i.e. for a total of twelve (12) additional oily water disposal records)
- Please ensure that the oily water acceptance and delivery records provided to the Department for review correspond to oily water shipments that occurred <u>before</u> June 6, 2018 (i.e. before the date of the inspection)

6. Please submit (via email) sixteen (16) used oil filter/used oil absorbent acceptance and delivery records from the past three (3) years to the Department for review

- These records should list the used oil filter/used oil absorbent shipments that EGWRS personnel have accepted from the facility's used oil filter and used oil absorbent customers and transported to Wheelabrator South for proper disposal
- You may provide four (4) used oil filter/used oil absorbent acceptance and delivery records from 2016, 2016, 2017, and 2018 (i.e. for a total of sixteen (16) used oil filter/used oil absorbent disposal records)
- Please ensure that the used oil filter/used oil absorbent acceptance and delivery records provided to the Department for review correspond to used oil filter/used oil absorbent shipments that occurred <u>before</u> June 6, 2018 (i.e. before the date of the inspection)

7. Please re-notify with the Department as a Used Oil Transporter, a Used Oil Filter Transporter, <u>and a Used Oil Filter Transfer Facility</u>

- As the facility does not accumulate oily water on-site for more than 24 hours, the facility is indeed operating as a Used Oil Transporter

- However, as EGWRS does accumulate used oil filters on-site for up to one (1) week, the facility is also operating as a Used Oil Filter Transfer Facility (as used oil filters are accumulated on-site for between twenty-four [24] hours and thirty-five [35] days)
- Therefore, EGWRS needs to re-submit an updated Used Oil Registration Form to the Department that additionally characterizes the facility as a Used Oil Filter Transfer Facility

Please undertaken and submit (via email) documentation of the aforementioned corrective actions within fifteen (15) days of today (i.e. by August 10, 2018).

I am currently reviewing all of the notes, photographs, and documentation that pertain to the inspection, and I will promptly inform you of any other issues that require additional corrective action.

Thank you very much again, and please contact me if you have any questions.

Sincerely,

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