



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

FACILITY INFORMATION:

Facility Name: Clean Fuels of Florida Inc

On-Site Inspection Start Date: 12/04/2018

On-Site Inspection End Date: 12/04/2018

ME ID#: 55537

EPA ID#: FLD984171256

Facility Street Address: 2635 NE 4th Ave, Pompano Beach, FL 33064-5405

Contact Mailing Address: 2635 NE 4th Ave., Pompano Beach, FL 33064

County Name: Broward

Contact Phone: (954) 791-9588

NOTIFIED AS:

SQG (100-1000 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for SQG (100-1000 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Robert Berberena, Inspector

Other Participants: Barry Fernandez, President; Matt Noland, Warehouse Manager; Paulette Fernandez, Office Manager

LATITUDE / LONGITUDE: Lat 26° 15' 49.4262" / Long 80° 6' 58.539"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On December 4th, 2018 a compliance evaluation inspection took place at Clean Fuels of Florida Inc. (CFF). During the inspection the Florida Department of Environmental Protection (DEP) was represented by Robert Berberena and CFF by its owner Mr. Barry Fernandez. CFF's facilities are located at 2635 NE 4th avenue, Pompano Beach, FL. CFF was registered as a Transporter of Universal Waste Lamps and Devices, Transfer Facility for Universal Waste Lamps, Transfer Facility for Universal Waste Devices, and Small Quantity Handler services. CFF has also notified as a hazardous wastes Small Quantity Generator of (SQG). Currently CFF has about eight (8) employees and had been operating at this location since August of 2005. The facility consists of a storage area for wastes, a parking area for service trucks and equipment, and office areas. The building occupies about 5,000 sq.ft. and is provided with city water and sewer services.

Notification History

CFF's last notification was on June 20th, 2020. FDEP reviewed CFF's application and has been registered through March 1, 2019 with the following status:

Transporter of Universal Waste lamps Devices

Transfer Facility for Universal Lamps

Transfer Facility for Universal Devices

Small Quantity Handler Facility for Universal Waste Lamps and Devices

Universal Waste Transporter/Handler (lamps, devices, batteries, pharmaceuticals)

Hazardous Wastes Transporter

Used Oil Transporter

Inspection Date: 12/04/2018

Inspection History

The last time that CFF was inspected was on April 14th, 2015. The facility was out of compliance with state and federal hazardous waste regulations which included hazardous waste determination, incorrect LDR notices, Universal Waste labeling and accumulation time frame, and training record keeping. After going through an enforcement process CFF returned to compliance on 8/5/2016. No other inspection took place during the past five calendar years.

Process Description:

The inspector toured the facility accompanied by Mr. Fernandez and reviewed hazardous waste management and disposal practices. CFF has a storage area that segregates non-hazardous wastes, universal wastes and plastic empty drums that they sell to customers. Based on CFF's operations the facility is mainly subject to the 40 CFR 273 and 62-730186 requirements for universal pharmaceutical wastes.

PCW Management-Fuel Filtering Service

CFF provides in-situ filtering of petroleum fuels stored in tanks to remove water, scale, sediments, microbial sludge, and suspended contaminants. The tanks serviced are mainly diesel fuel tanks for backup generators at hospitals. The field trucks each have a 3-stage filter system and PCW removed from a tank is collected in 55-gallon drums on-board each truck. The drums of PCW remain on each truck and the PCW is vacuumed from the drums by Jam Environmental and Vacuum Services, LLC (EPA ID #FLR000176842), who then transports the PCW to Cliff Berry, Inc. The filter system's cartridge filters are changed about every 2-3 months, accumulated at the facility, and picked up by Jam Environmental. Absorbent pads used by the field staff are also accumulated and picked up by Jam Environmental and are transported to authorized facilities.

CFF has three (3) Hazardous Waste transport trucks, below is the information for their trucks:

2015 Hino Vin# 5PVNJB JV6F4S58651
2018 ISUZU Vin# JALB4W177J7F00226
2007 MITSUBISHI Vin# JL6BBE1S37K002041

DOT# 0981373 / FLDOH# 7625

Central Accumulation Area

At the time of the inspection the DEP inspector observed 7 pallets of UPW, a box of Universal Wastes containing fluorescent bulbs for recycling, that was closed and labeled and marked 9-27-18 as the accumulation start date. Although they are registered to manage used oil filters, no filters were observed during the inspection, and there were no oily rags and used oil filters, in the central accumulation area. The areas were appropriately segregated with proper aisle space to inspect all containers.

> CFF has Broward's County Waste Transporter License# WT-18-0075 for Discarded Hazardous Material Hauling, Used Oil, RCRA Hazardous Waste, Nonhazardous Industrial Waste (Solid & Liquid) and Biomedical Waste Hauling. The license will expire on June 30, 2020.

Record Review:

At the time of the inspection, transportation/disposal records were available for review for a period of three (3) years. The inspector reviewed the following:

> Waste Manifest

Manifests and bills of lading (from previous years) appeared to be in order. On the latest shipments they transported Universal Pharmaceutical wastes or subcontracted EQ-Florida [FLD981932494], and A R Paquette & Company FLD982105884. The designated facility was Clean Earth of Alabama [ALD951020894]

> CFF Management Practices during Inbound and Outbound of UPW

>>> Inbound UPW

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Base on the inspector review, it was noted that uses uniform hazardous waste manifest. All pharmaceutical waste that they manage will go out as hazardous and will use the corresponding EPA waste code. As seen on manifests from previous shipments they had transported: Waste Medicine, Liquid, Flammable, Toxic, NOS, (Universal Pharmaceutical Waste), 3 (6.1), UN3248. In the past other wastes were transported under EPA Wastes Codes D001, D005, D007, D009, D010, D011, D018, D024, D026, P001, P042, P075, P188, U010, U035, U058, U129, U150, U188, U200, U205, and U206. Universal waste pharmaceuticals are mainly picked up from government facilities and health care facilities and are transported back to the facility.

>>>Outbound UPW

Outbound UPW containers are stretch-wrapped to pallets, labeled, and dated. The accumulation dates are the dates CFF received the UPW. Each visible outbound pallet of UPW was labeled with the EPA waste numbers D001, U010, U026, U035, U058, U059, U089, U150, U206, and U237. The DOT shipping description was: UN3248, Waste Medicine, Liquid, Flammable, Toxic, NOS, 3 (6.1), PGII.

Hazardous waste lab packs are picked up and driven directly to EQ of Florida (EPA ID#FLD981932494), in Tampa. CFF prepares most of the lab packs, but also uses a contractor to do some of the more complex lab packs.

After reviewing all documentation, it appears that this facility is not receiving or storing hazardous wastes. CFF is an authorized transporter [FLD94171256] that hauls shipments for their customers and may use secondary transporters. The designated facility name and address is EQ Florida, 2002 N Orient Rd, Tampa FL 33610 [FLD981932494]. Their last shipment took place on 11/30 2018.

> Weekly Inspection Log and Pre-Trip Checklist

Weekly log inspection and Pre-trip checklist were provided. The last one was dated 11/28/2018. The logs have information regarding the storage area, date, inspector, time, number of containers, its condition, observations and space to include repairs or remedial actions.

> Employee Training

CFF representatives provided certifications of the different training courses such as DOT, OSHA and Hazardous Materials Operator. The certificates showed that the last refresher courses on May 17th, May 22nd and May 26th, 2018 respectively. Their annual UPW training took place on May 4th, 2018. Other training records demonstrated that CFF has been providing training to their technical personnel for the past three years.

> Contingency Plan / Spill Prevention & Response Plan

CFF provided a Contingency Plan (CP) that they also called Spill Prevention & Response Plan for clean-up procedures and responses to releases of universal wastes per 40 CFR 273.37. The last revision was on July 2018 and it has provisions for diverse contingencies including floods, hurricanes, tornadoes, fires, toxic gas releases, chemical spills, explosions, civil disturbances and work place violence resulting in bodily harm and trauma. Information regarding emergency coordinator(s) was included. Also, evacuation map and all elements required by rule. The CP is adapted to their actual building. The notifications to the authorities were sent on August 1st, 2018.

UPW and Used Oil Transporters requirements:

> CFF receives waste from different companies, hospitals, private and governmental institutions to transport them for eventual recycling or disposal. The facility maintain waste profiles related to their customer's waste streams and required to conducts or receives evidence of any laboratory tests to confirm that a proper waste determination has been conducted by the customer prior to pick up the universal pharmaceutical wastes.

> For used oil acceptance and delivery records, CFF tested to the parameters established on the 279, rules and 62-710 F.A.C. CFF uses a Sniffer for halogen screening that is kept in their trucks. Based on the inspector review, documentation provided appeared to be in order.

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> CFF has Liability Insurance. The insurance is primary and CFF shall not be liable for amounts of \$2,000,000. The coverage was provided under policy number FEIECC1095106 / AQ1YFL00064100. The expiration day was set for 9/20/2019. The notification was associated with the contingency plan.

> CFFs also has the required DOT certification Reg. No. 062918550365AB , under USDOT HM Company 64087. The registration expires on June 30, 2020

Preparedness and Prevention

CFF has fire extinguishers, and eye wash stations throughout the facility within a reasonable distance of any area where exposure is likely. Spill kits and absorbents were also observed. The fire extinguishers and the sprinkler system are serviced on an annual basis. Updated tags were observed.

PHOTO ATTACHMENTS:

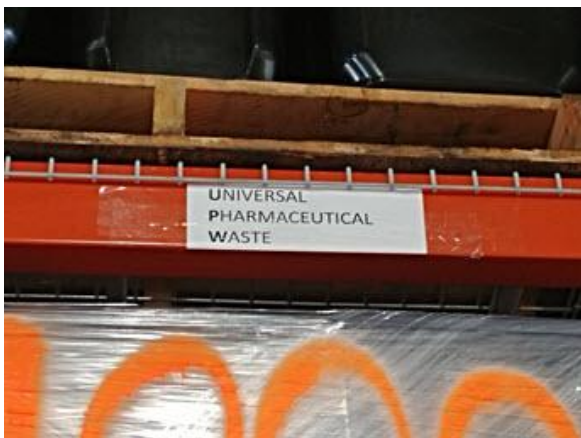
Universal Waste, mercury containing lamps for recycling



Non-RCRA Wastes



Clean Fuels UW Storage Area



Containers



Inspection Date: 12/04/2018

Central Accumulation Area



Empty Containers



Storage Area



Conclusion:

At the time of the inspection, Clean Fuels of Florida Inc. appeared to be in compliance with Hazardous Waste state and federal regulations.

Inspection Date: 12/04/2018

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? 262.18(a) | ✓ | | |
| 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: 12/04/2018

3.0 - Small Quantity Generator 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. | 40 CFR 262 Subpart A -- General Standards | Yes | No | N/A |
|----------|--|-----|----|-----|
| 3.1 | Has the facility properly identified all hazardous waste streams? 262.11 | ✓ | | |
| 3.2 | Has the facility obtained an EPA ID number? 262.18(a) | ✓ | | |
| 3.3 | Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? 262.18(c) | ✓ | | |
| 3.4 | Are any hazardous wastes treated or disposed of on site? | | | |
| 3.5 | If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1) | ✓ | | |
| Item No. | Land Disposal Restrictions | Yes | No | N/A |
| 3.6 | Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a) | ✓ | | |
| 3.7 | Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings to meet applicable LDR treatment standards found at 268.40? 268.7(a)(5) | ✓ | | |
| 3.8 | Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5) | ✓ | | |
| 3.9 | If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i) | ✓ | | |
| 3.10 | If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i) | ✓ | | |
| 3.11 | Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii) | ✓ | | |
| 3.12 | Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii) | ✓ | | |
| 3.13 | Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a) | ✓ | | |
| 3.14 | If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a) | ✓ | | |
| 3.15 | If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a) | ✓ | | |
| 3.16 | If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2) | ✓ | | |
| 3.17 | If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2) | ✓ | | |
| 3.18 | If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3) | ✓ | | |
| 3.19 | Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8) | ✓ | | |
| 3.20 | Is the generator managing lab packs using the alternative treatment standard for lab packs in 268.42(c)? 268.7(a)(9) | | | |
| 3.21 | Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9) | ✓ | | |
| 3.22 | Is the generator a small quantity generator (SQG) using a tolling agreement pursuant to 40 CFR 262.20(e)? | | | |
| 3.23 | Did the SQG comply with the applicable notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(10) | ✓ | | |
| 3.24 | Has the SQG retained on-site a copy of the notification and certification, along with the tolling agreement, for at least 3 years after termination or expiration of the agreement? 268.7(a)(10) | ✓ | | |

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| Item No. | The Manifest | Yes | No | N/A |
|----------|--|-----|----|-----|
| 3.25 | <p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are NOT in compliance) 262.20(a)(1)</p> <p><input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number</p> <p><input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p><input type="checkbox"/> Item 3. Emergency Response Phone Number (must meet requirements below)</p> <p><input type="checkbox"/> Item 4. Manifest Tracking Number</p> <p><input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p><input type="checkbox"/> Item 6. Transporter 1 Company Name & U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 7. Transporter 2 Company Name & U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group.</p> <p><input type="checkbox"/> Item 10. Containers (Number and Type)</p> <p><input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p><input type="checkbox"/> Item 12. Units of Measure (Weight/Volume)</p> <p><input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p><input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information</p> <p><input type="checkbox"/> Item 15. Generator's / Offeror's Certifications</p> <p><input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted)</p> <p><input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p><input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p><input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes</p> <p><input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p> | ✓ | | |
| 3.26 | Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b) | ✓ | | |
| 3.27 | Did the generator sign the manifest certification by hand? 262.23(a)(1) | ✓ | | |
| 3.28 | Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2) | ✓ | | |
| 3.29 | Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3) | ✓ | | |
| 3.30 | For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23(c) | ✓ | | |
| 3.31 | <p>For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d)</p> <p><input type="checkbox"/> The next non-rail transporter?</p> <p><input type="checkbox"/> The Designated Facility if transported solely by rail?</p> <p><input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail?</p> | ✓ | | |
| 3.32 | If the generator did not receive a signed return copy of the manifest from the designated facility within 60 days of shipment, did the generator file an exception report? 262.42(b) | ✓ | | |
| 3.33 | Did the generator maintain manifests for 3 years? 262.40(a) | ✓ | | |
| 3.34 | Did the facility have any rejected shipments of hazardous waste or container residues returned by the Designated Facility? | | | |
| 3.35 | If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f) | ✓ | | |
| Item No. | Pre Transport Requirements | Yes | No | N/A |
| 3.36 | Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30 | ✓ | | |
| 3.37 | Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31 | ✓ | | |
| 3.38 | Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a) | ✓ | | |
| 3.39 | Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are NOT in compliance) | ✓ | | |

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| Item No. | Pre Transport Requirements | Yes | No | N/A |
|----------|--|-----|----|-----|
| | 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number? | ✓ | | |
| 3.40 | Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33 | ✓ | | |
| Item No. | Accumulation Requirements | Yes | No | N/A |
| 3.41 | Does the facility accumulate hazardous waste on-site prior to treatment or disposal? 262.16 | ✓ | | |
| 3.42 | Check the applicable accumulation unit if the facility accumulates hazardous waste on-site prior to treatment or disposal <input type="checkbox"/> Containers - Complete Container Checklist below <input type="checkbox"/> Tanks - Complete Tanks Checklist below | | | |
| 3.43 | Does the facility comply with the 180-day accumulation time limit? 2262.16(b) | ✓ | | |
| 3.44 | If NO, has the facility been issued an extension by the Department? 2262.16(d) | ✓ | | |
| 3.45 | Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? 262.16(b)(1) | ✓ | | |
| 3.46 | Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.16(b)(6)(i)(C) | ✓ | | |
| 3.47 | Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.16(b)(6)(i)(A) | ✓ | | |
| 3.48 | Are Satellite Accumulation points used? (If No, mark all items below as N/A.) | | | |
| 3.49 | Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.15(a) | ✓ | | |
| 3.50 | Are satellite containers under the control of the operator of the process generating the waste? 262.15(a) | ✓ | | |
| 3.51 | Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 2262.15(a)(1) | ✓ | | |
| 3.52 | Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 2262.15(a)(1) | ✓ | | |
| 3.53 | Does the generator keep satellite containers closed during storage, except when adding or removing waste? 2262.15(a)(4) | ✓ | | |
| 3.54 | Has the generator marked satellite containers with the words "Hazardous Waste"? 262.15(a)(5) | ✓ | | |
| 3.55 | Is greater than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste accumulated in the Satellite point? | | | |
| 3.56 | If YES, after 3 days did the generator mark an accumulation start date on the excess waste container? 262.16(b)(6)(i)(C) | ✓ | | |
| 3.57 | If YES, after 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.16(b)(6)(i)(A) | ✓ | | |
| Item No. | Emergency Information/Personnel Training | Yes | No | N/A |
| 3.58 | Has the facility identified at least one employee to act as the Emergency Coordinator? 262.16(b)(9)(i) | ✓ | | |
| 3.59 | Has the facility posted required emergency information next to a telephones or in areas directly involved in the generation and accumulation of hazardous waste? (Check items below that are NOT in compliance) 262.16(b)(9)(ii) <input type="checkbox"/> Name and telephone number of the Emergency Coordinator <input type="checkbox"/> Location of fire extinguishers and spill control material, and, if present, fire alarm <input type="checkbox"/> Telephone number of the fire department, unless the facility has a direct alarm (911 is acceptable) | ✓ | | |
| 3.60 | Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? 262.16(b)(9)(iii) | ✓ | | |
| 3.61 | Has the facility had to respond to any emergencies in the past 3 years? | | | |
| 3.62 | If YES, did the facility respond in a manner described below, or other appropriate manner? (Check items below that are NOT in compliance) 262.16(b)(9)(iv) <input type="checkbox"/> FIRE - Call fire department or attempt to extinguish with a fire extinguisher <input type="checkbox"/> SPILL - Contain the waste and clean up any hazardous waste and contaminated materials and soil <input type="checkbox"/> FIRE, EXPLOSION, or RELEASE that posed threat - Notify the State Watch Office and National Response Center and report | ✓ | | |

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| Item No. | Use and Management of Containers | Yes | No | N/A |
|----------|---|-----|----|-----|
| 3.63 | Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.16(b)(2)(i) | ✓ | | |
| 3.64 | Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 262.16(b)(2)(ii) | ✓ | | |
| 3.65 | Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 262.16(b)(2)(iii)(A) | ✓ | | |
| 3.66 | Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 262.16(b)(2)(iii)(B) | ✓ | | |
| 3.67 | Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 262.16(b)(2)(iv) | ✓ | | |
| 3.68 | Does the generator properly document the weekly inspections? This should include at a minimum: (Check items below that are NOT in compliance) 62-730.160(3) <input type="checkbox"/> Date and Time of inspection <input type="checkbox"/> Legibly printed name of inspector <input type="checkbox"/> Number of hazardous waste containers <input type="checkbox"/> Condition of containers <input type="checkbox"/> Notation of observations made <input type="checkbox"/> Date and nature of any repairs or remedial actions | ✓ | | |
| 3.69 | If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 262.16(b)(2)(v)(A)? 262.16(b)(2)(v)(A) | ✓ | | |
| 3.70 | If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 262.16(b)(2)(v)(B)? 262.16(b)(2)(v)(B) | ✓ | | |
| 3.71 | Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 262.16(b)(2)(v)(C) | ✓ | | |
| Item No. | Tanks Requirements for SQGs | Yes | No | N/A |
| 3.72 | Does the facility treat or store hazardous waste in tanks? | | | |
| 3.73 | If YES, does the facility comply with the requirements of 40 CFR 265.17(b)? 262.16(b)(3)(ii)(A) | ✓ | | |
| 3.74 | Has the facility ensured no hazardous waste or treatment reagent is placed in a tank that could cause the tank or inner liner to rupture, leak, corrode, or otherwise fail? 262.16(b)(3)(ii)(B) | ✓ | | |
| 3.75 | Are uncovered tanks operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with containment that meets or exceeds the volume of the top 2 feet of the tank? 262.16(b)(3)(ii)(C) | ✓ | | |
| 3.76 | If hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow (waste feed cut-off or by-pass system)? 262.16(b)(3)(ii)(D) | ✓ | | |
| 3.77 | Does the facility inspect, where present, the following at least once each operating day: | | | |
| 3.78 | Discharge Control Equipment (waste feed cut-off, by-pass, and drainage systems)? 262.16(b)(3)(iii)(A) | ✓ | | |
| 3.79 | Data gathered from monitoring equipment (e.g., pressure and temperature gauges)? 262.16(b)(3)(iii)(B) | ✓ | | |
| 3.80 | The level of waste in the tank? 262.16(b)(3)(iii)(C) | ✓ | | |
| 3.81 | Does the facility inspect the following at least weekly: | | | |
| 3.82 | The construction materials of the tank to detect corrosion or leaking of fixtures or seams? 262.16(b)(3)(iii)(D) | ✓ | | |
| 3.83 | The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) to detect erosion or obvious signs or leakage? 262.16(b)(3)(iii)(E) | ✓ | | |
| 3.84 | Does the facility accumulate waste in tanks or tank systems that have full secondary containment and either leak detection equipment to alert facility personnel to leaks or established workplace practices to ensure leaks are promptly identified? | | | |
| 3.85 | If YES, does the facility inspect Discharge Control Equipment, Data, and Level of waste in tanks at least weekly? 262.16(b)(3)(iv) | ✓ | | |
| 3.86 | Is the use of the alternate inspection schedule (weekly versus daily) documented in the facility's operating record? 262.16(b)(3)(iv) | ✓ | | |
| 3.87 | Does the documentation include a description of the established workplace practices at the facility? 262.16(b)(3)(iv) | ✓ | | |
| 3.88 | Upon closure of the facility, was all hazardous waste removed from tanks, discharge control equipment, and confinement structures? 262.16(b)(3)(vi) | ✓ | | |
| 3.89 | Does the facility manage ignitable or reactive waste in tanks? | | | |
| 3.90 | If YES, does the facility meet one of the following 3 conditions? (Check the condition that applies below) 262.16(b)(3)(vii)(A) <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated, rendered, or mixed before or immediately after placement in the tank so that (A) the resulting mixture no longer meets the definition of ignitable or reactive waste and (B) the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to | ✓ | | |

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| Item No. | Tanks Requirements for SQGs | Yes | No | N/A |
|----------|---|-----|----|-----|
| | <input type="checkbox"/> integrity of the device, etc. - are met? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the waste treated or stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? <input type="checkbox"/> If ignitable or reactive waste is placed in a tank is the tank used solely for emergencies? | ✓ | | |
| 3.91 | If the facility treats or stores ignitable or reactive waste in a covered tank does the facility comply with the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code"? 262.16(b)(3)(vii)(B) | ✓ | | |
| 3.92 | If incompatible wastes or incompatible waste and materials are placed in the same tank does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(1) | ✓ | | |
| 3.93 | If hazardous waste is placed in an unwashed tank which previously held an incompatible waste or material does the facility comply with the requirements of 265.17(b) - no risk of fire, explosion, fumes, gases, damage to integrity of the device, etc. - are met? 262.16(b)(3)(vii)(C)(2) | ✓ | | |
| Item No. | Preparedness and Prevention | Yes | No | N/A |
| 3.94 | Is there no evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? 262.16(b)(8)(i) | ✓ | | |
| 3.95 | Does the facility have an internal communication or alarm system? 262.16(b)(8)(ii)(A) | ✓ | | |
| 3.96 | Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 262.16(b)(8)(ii)(B) | ✓ | | |
| 3.97 | Is the fire control equipment adequate? 262.16(b)(8)(ii)(C) | ✓ | | |
| 3.98 | Is spill control and decontamination equipment present? 262.16(b)(8)(ii)(C) | ✓ | | |
| 3.99 | If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? 262.16(b)(8)(ii)(D) | ✓ | | |
| 3.100 | Is the emergency equipment inspected and tested periodically? 262.16(b)(8)(iii) | ✓ | | |
| 3.101 | Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? 262.16(b)(8)(v) | ✓ | | |
| 3.102 | Has the facility made emergency response arrangements with the following: 262.16(b)(8)(vi)(A) <input type="checkbox"/> Fire Department <input type="checkbox"/> Police <input type="checkbox"/> Hospital <input type="checkbox"/> Emergency Response Contractor | ✓ | | |
| 3.103 | If NO has the facility attempted to do so and is the refusal documented? 262.16(b)(8)(vi)(B) | ✓ | | |
| Item No. | Record keeping and Reporting | Yes | No | N/A |
| 3.104 | Is the generator keeping records of exception reports? 262.42(b) | ✓ | | |
| 3.105 | Is the generator keeping records of test results, waste analysis or other determinations made in accordance with 262.11? 262.11(f) | ✓ | | |
| 3.106 | Are the records kept on-site? 262.40 | ✓ | | |
| 3.107 | Are records kept for a minimum of 3 years? 262.40 | ✓ | | |
| 3.108 | Has the generator exported any waste outside the U.S.? (If No, mark item below as N/A.) | | | |
| 3.109 | If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.83(b) | ✓ | | |
| 3.110 | Has the generator imported any hazardous waste into the U.S.? (If No, mark item below as N/A.) | | | |
| 3.111 | If YES, did the generator meet all of the requirements of 40 CFR 262.83? 262.83 | ✓ | | |

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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.

Robert Berberena

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

02/04/2019

Date

Barry Fernandez

Representative Name

President

Representative Title

Clean Fuels

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.

Matt Noland

Representative Name

Warehouse Manager

Representative Title

Clean Fuels

Organization

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Paulette Fernandez

Representative Name

Office Manager

Representative Title

Clean Fuels

Organization

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Report Approvers:**Approver:**

Norva Blandin

Inspection Approval Date:

02/04/2019