



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

FACILITY INFORMATION:

Facility Name: Associated Waste Services

On-Site Inspection Start Date: 06/17/2019

On-Site Inspection End Date: 06/17/2019

ME ID#: 133273

EPA ID#: FLR000231209

Facility Street Address: 5951 NW 151st St #205, Miami Lakes, FL 33014-2439

Contact Mailing Address: 5951 NW 151st St, Miami Lakes, FL 33014-2439

County Name: Miami-Dade

Contact Phone: (786) 631-2210

NOTIFIED AS:

VSQG

INSPECTION TYPE:

Routine Inspection for Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Romina J Lancellotti, Inspector

Other Participants: Alannah Irwin, ES III Inspector; Larry Rodriguez, President

LATITUDE / LONGITUDE: Lat 25° 54' 40.5072" / Long 80° 17' 51.2088"

NAIC 484110 - General Freight Trucking, Local

TYPE OF OWNERSHIP: Private

Introduction:

A Compliance Evaluation Inspection (CEI) was conducted at Associated Waste Services Corp (AWS) and was performed on 06/17/2018 by Romina Lancellotti, Environmental Specialist II and Alannah Irwin, Environmental Specialist III. AWS specializes in the services of regulated waste management and disposal, specifically for universal waste (UW) and hazardous waste (HW).

On May 18, 2018, DEP conducted a Compliance Evaluation Inspection (CEI) for this company which was registered under a different EPA ID FLR000223313 since it was located in a different address at 7400 NW 77th Terr, Medley, FL, 33166.

The facility consists on an leased office located in the second floor of a building and also has access to one garage within the building. The company has 2 employees, and is connected to public water and sewer. The company has been in operation since June 2017, but it moved to this facility in February 2019 and thus obtained a new EPA ID.

NOTIFICATION HISTORY

>03/01/19- AWS moved from 7400 NW 77th Ter, Medley, FL, 33166 to 5951 NW 151 St #205, Miami Lakes, FL, 33014 and obtained a new EPA ID FLR000231209 on 03/01/19, and notified as VSQG, hazardous waste transporter and universal waste transporter. AWS did not notify as an Used Oil Transporter (UOT).

INSPECTION HISTORY

>The facility had been never inspected by the Department at this location.

PPE was not required to enter this facility. However, Department personnel was equipped with steel toe boots.

Process Description:

AWS operates a hazardous waste transporter facility with one office and one bay which is used to store the one (1) vehicle owned by the company, which is used for hazardous waste transportation. AWS primary business is transporting hazardous waste from hazardous waste generators to a secondary transporter which

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appears to be Stericycle Specialty Waste Solutions Inc (EPA ID FL0000702985), based on hazardous waste manifests. AWS has one driver and offers services to Broward and Miami-Dade counties. All manifests related to hazardous waste were available onsite for review.

During the inspection, the inspectors walked through the office where documentation is kept. Also, the inspectors walked around the property, and no hazardous waste was observed on-site or in the truck.

RECORDS REVIEW

A) Manifest records- Receiving and shipping records were available for review at time of inspection. AWS collects hazardous waste from mostly very small quantity generators (VSQG) and some small quantity generators (SQG) of hazardous waste in Broward and Miami-Dade counties, then the waste is transported by Stericycle Specialty Waste Solutions Inc (EPA ID FL0000702985) to its final destination at Allworth, LLC (EPA ID ALD094476793), located at 500 Medco Road, Birmingham, AL, 36217. All manifests provided by AWS showed that the transporter held the waste less than 24 hours and that the company has the signed return final copy for the manifests. Based on record review, it was confirmed that AWS does not operate as a hazardous waste transfer facility.

In addition, based on waste manifests provided to the Department, most of the hazardous waste generators where waste is collected by AWS, are very small quantity generators (VSQG). Most of these VSQG are not registered and do not have an EPA ID, therefore, Block 1 on the Uniform Hazardous Waste Manifests, include the acronym "CESQG" (Conditionally Exempt Small Quantity Generator) and not an EPA ID. On the other side, when hazardous waste is collected from SQG, the EPA ID is included on Block 1 on the waste manifests.

No used oil, biomedical or universal pharmaceutical wastes appear to be transported by AWS under the new EPA ID obtained on March 1, 2019.

B) Liability Insurance- The facility provided the Department a letter of self-insurance provided and certified by Capital Specialty Insurance Corporation (Policy Number EV2018139202) and supports the use of provision 62-730.170(2)(a) F.A.C. for automobile liability, that includes pollution prevention liability, in the amount of \$1,000,000, expiration date 05/08/20.

C) Employee Training- AWS has one driver which is Larry Rodriguez. On 07/01/19, AWS provided via email a HAZWOPER and Emergency Response refresher training certificate for the driver, completed on 05/02/18. The Department of Transportation 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.

D) 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. All information and phone numbers are up-to-date.

E) Hazardous Waste Transporter Certificate- AWS maintains a copy of the approval, issued by FDEP, to transport hazardous waste in any vehicle transporting hazardous waste, expiration date 11/30/19.

F) Annual Vehicle Report- AWS provided an annual vehicle inspection report, which certifies that the vehicle used to transport hazardous waste passed all the inspection items in accordance with 49 CFR 396. US DOT# 3056263.

On July 1, 2019, AWS provided pictures of the front, side and inside of the company's truck. This possess spill kit, empty drums, US DOT number and the placarding holder.

PHOTO ATTACHMENTS:

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Front of the Facility



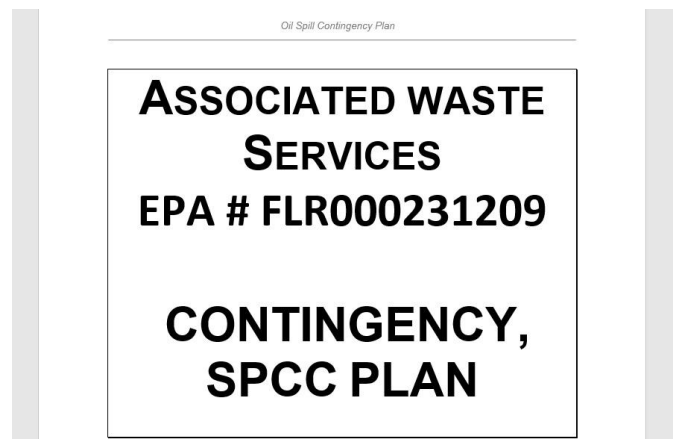
Garage to store truck



Spill Kit and Empty Drum



SPCC Plan



AWS Truck with US DOT Number



Conclusion:

Associated Waste Services operates as a hazardous waste transporter, universal waste transporter and VSQG of hazardous waste. During time of inspection, the facility was in compliance with state and federal hazardous waste regulations.

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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.

Romina J Lancellotti

Principal Inspector Name

Inspector

Principal Inspector Title**Principal Inspector Signature**

DEP

Organization

07/24/2019

Date

Alannah Irwin

Representative Name

ES III Inspector

Representative Title

FDEP

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.

Larry Rodriguez

Representative Name

President

Representative Title

Associated Waste Services

Organization

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Report Approvers:**Approver:**

Norva Blandin

Inspection Approval Date:

07/24/2019