From:	Reis, Juliana
To:	erik@tgoilservices.com
Subject:	FW: Exit interview- TG oil Services - EPA ID FLR000222836
Date:	Monday, August 19, 2019 3:26:00 PM

Good afternoon Mr. Valiente,

On 08/15/19, the Department of Environmental Protection conducted Compliance Evaluation inspection at TG oil services. During the inspection the following issues were identified:

- Notification to DEP: Attached follows the 87000-12FL form to re-notify the Department regards your activities.
  Please remove status **Hazardous waste transporter ,** if the facility wishes to; If not, the facility shall follow the requirements under 40 CFR 263 for hazardous waste transporters.
  On this new notification, add the status of **Transfer facility** , since the facility has been acting as one, storing used oil for more than 24 hours and less than 35 days, per 40 CFR 279.20(b)(2).

- Halogen Test [per 40 CFR 279.44(b)(1-2)]: **Transporters** are required to perform halogen test for hazardous determination.
  Please acquired the necessary equipment in order to preform halogen screening. Please send a photo of this to the department. Also, please start conducting halogen screening on all used oil pickups and documented it on the manifests. Please send the latest manifest weeks as corrective action.

- Secondary Containment: The facility had eight (8) 55-gallons of Used oil drums without a secondary containment. Pursuant to 62-710.401(6) F.A.C, containers over 55-galon must have a secondary containment that holds 110% of its total volume.

Submit corrective action as pictures to the Department of these **UO drums with secondary containment**.

- SPCC – Spill Prevention Plan and Countermeasure: attached follows SPCC guidance from EPA.
  Submit a copy of the facility SPCC plan , since the total capacity of the containers is over 1,320 gallons of used oil.
  This Plan must follow the requirements of 40 CFR 112.7

- **The Department recommends** that this facility maintains on its trucks, as a best management practice : a copy of Liability insurance, a copy of its UOT registration and a copy of the SPCC plan.

- Training: Recorded training is required for UO transporter, following [62-710.600(2)(c), FAC.

Attached is a power point presentation from DEP**. Submit documentation (sign in sheet) showing training has been conducted.**

Please submit this documents to the Department by **(08/26/19),** for compliance determination.

In case of questions or concerns, contact me at email or phone below. I will be your new case manager.

Best regards,

Juliana Reis
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