



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

FACILITY INFORMATION:

Facility Name: TG Oil Services Inc
On-Site Inspection Start Date: 08/15/2019 **On-Site Inspection End Date:** 08/15/2019
ME ID#: 124783 **EPA ID#:** FLR000222836
Facility Street Address: 7815 W 2nd Ct Unit 2 , Hialeah , Florida 33014-4317
Contact Mailing Address: 7815 W 2nd Ct Bay 2, Hialeah, Florida 33014
County Name: Miami-Dade **Contact Phone:** (954) 874-0930

NOTIFIED AS:

Non-Handler
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for VSQG (<100 kg/month) Facility
Routine Inspection for Used Oil Transfer Facility Facility
Routine Inspection for Used Oil-Other Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Juliana Reis, Inspector
Justin Stark, Environmental Specialist II; Romina Lancellotti, Environmental Specialist II;
Other Participants: Erik Valiente, Safety Director

LATITUDE / LONGITUDE: Lat 25° 53' 38.364" / Long 80° 17' 16.764"

NAIC: 562998 - All Other Miscellaneous Waste Management Services

TYPE OF OWNERSHIP: Private

Introduction:

A Compliance Evaluation Inspection was conducted on TG Oil Services Inc (TG) and performed by Environmental Specialist I, Juliana Reis (Inspector), on behalf of the Florida Department of Environmental Protection (DEP) on May 29, 2019. The Inspector was accompanied by DEP representatives Justin Stark, Environmental Specialist II; Romina Lancellotti; Environmental Specialist II; and TG representative Erik Valiente, Safety Director. The facility is situated on approximately 1,300 square feet of property, has 15 employees, and is on public water and sewer. The facility has been operating at this location for one (1) year.

Notification History:

08/23/19 – Notified as Used Oil Transporter (UOT) and Transfer facility and as Used Oil Filter Transporter (UOTF) and as Transfer Facility.
08/05/19 - Notified as a Hazardous Waste Transporter (HWT), Used Oil Transporter and Used Oil Filter Transporter; however, during the inspection, the inspectors observed the facility was also operating as a transfer facility. Compliance assistance was given advising TG to re-notify the Department adding the Transfer Facility status.
03/17/18 - Notified as Hazardous Waste transporter and as Used Oil Transporter. This notification expired on 06/30/19. On 07/19/19, the Department received TG's re-notification. The facility transported used oil and used oil filters for 19 days without a valid registration.
08/08/17 - Notified as Hazardous Waste Transporter and as Used Oil Transporter.

Inspection History:

The Department has never inspected this facility at this location. TG just moved from 7815 W 2nd Ct, unit #2, Hialeah, FL 33014, which is the current address but different unit (#7). The previous location was inspected by

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DEP on 06/21/17 and the facility was in compliance.

No PPE was required but Department personnel were equipped with steel toe boots.

Process Description:

TG is registered as a transporter for Used Oil (UO), Used Oil Filters (UOF) and Hazardous Waste. It mainly services elevator companies by draining oily water, repairing and impermeabilizing the elevator pits. Also, it sells oil to hydraulic elevators. Additionally, TG transports UO from small auto shops and UO transporters mainly considered as VSQG's and SQG's.

Upon arriving at the facility, the inspectors presented TG representatives their state issued credentials, as required. The inspectors toured the facility with TG representative, Mr. Valiente.

The inspectors toured three (3) areas of the facility. At the administrative offices, no hazardous waste was observed. Additionally, the oil storage and the water proofing department were inspected. These two departments are located across from each other and the office is in the middle of these two warehouses.

The Oil Storage

At this area TG stores UO, UOF, oily water and product oil.

At the Oil department the inspectors observed:

>One (1) vacuum truck with the capacity of 2,400 gallons (US DOT 3011682). Since this truck container is divided into different compartments, it was filled with approximately 700 gallons of product oil (Hydraulic Fluid AW32) and 240 gallons of UO.

The truck collects the UO, oily water and oily sludge from picked-up drums and it stores it in the truck container. After the truck is full, TG transports it to two (2) designated disposal sites: Raider Environmental Services (EPAD ID FLR000143891) which is currently registered as an UO Processor and accepts the UO, oily water, UO filters and UO sludge; and World Petroleum Corp. (EPA ID FLD980709075) which is currently registered as UO Processor and accepts UO and oily water. TG stated that, depending on the demand, it takes one (1) to two (2) weeks for this UO truck to be filled and taken to disposal facilities.

The delivery records reviewed during the inspection demonstrated the EPA ID from the transporter was missing on the delivery records [per 40 CFR 279.74(a)]. Compliance assistance was given, requesting the insertion of the transporter EPA ID on these records.

The following was also observed:

- > Eight (8) 55-gallon metal drums of oily water, closed, labeled and without secondary containment. The Department requested these drums be placed in secondary containment [pursuant to 62-710.401(6) FAC].
- > Two (2) 55-gallon metal drums of UO, labeled, closed, without a secondary containment.
- > Three (3) 55-gallon metal drums of UO, sludge, closed, labeled without secondary containment.
- > One (1) 55-gallon metal drum of oily rags, closed and labeled.
- > Twenty-three (23) empty metal drums to be re-used.

During the inspection, used oil filter drums were not observed on-site.

During the inspection, no spill kits were observed in this area. The Department required the facility to have one available in case of an emergency spill, even though there were no signs of oil spills on the floor. Fire extinguishers were observed near these premises.

The Water Proofing Department

At the water proofing department, the inspectors observed:

>One (1) empty vacuum truck with the capacity of 24,000 gallons (US DOT 3011682). It is also used for UO, oily water, UO sludges, and product oil. This truck had a spill kit inside and there are fire extinguishers nearby on-site. There was no registration or halogen screening tools observed on this truck during the inspection.

TG stated that the company owns a third UO box truck (capacity of 1,200 gallon), that is currently empty and parked at the owner's yard. Also, it owns four (4) vans that are used to carry tools and supplies used for the pit water proofing and repair. The two (2) employees licensed with commercial driver's license (CDL) are Erik Valiente and Victor Muniz, who are authorized to drive the vacuum trucks.

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The following hazardous materials were observed stored in this area: waterproof paints, seal foam chemical and concrete mixer stored in this area. The following biodegradable products were also observed: a degreaser and an eco-mineral spirit. No hazardous waste was observed in this area.

Record Review

As a UOT, TG must annually register and comply with reporting record requirements [per 62-710.500(1)(a), FAC]. The facility's UOT registration expired on 06/30/19 and was re-submitted to the Division on 07/19/19. During this time, the facility was not registered as an UOT, and it was found to transport UO with an expired registration. As it is shown on the manifests, there were 19 days, from 07/01/19 until 07/19/19, that TG transported 2,649 gallons of UO without a valid registration.

During the inspection, it was observed that TG was acting as a Transfer facility of UO without properly registering with the Department. A transporter who stores used oil on-site for longer than 24 hours, but less than 35 days, shall register with DEP [per 40 CFR 279.42(a) and 62-710.500(1)(a) F.A.C]. According to Mr. Valiente, the vacuum trucks take up to two (2) weeks to go to the recycling facility. During the time of inspection, it had approximately 935 gallons of used oil on-site for more than 24 hours and less than 35 days. Compliance assistance was given, and the facility re-notified on 08/21/19.

No hazardous waste manifests were available, since TG has discontinued hazardous waste transportation for the last 3 years.

Both vacuum trucks have DOT placards displayed on them, but they did not have UO registration, liability insurance or SPCC plan on them. The Department advised TG that UO transporters must keep copies of the permits, notifications, contingency plans (in case of emergency) and manifests on the truck [per 40 CFR 279.43(b)].

Insurance Liability - The facility provided the Department a certificate of liability insurance for hazardous waste and used oil. Name of the insurer is Progressive Express Assurance for one million dollars [per 62-710.600(2)(e), FAC], policy # 06235668 and expiration date: 06/20/2020. During the time that the facility or TG was operating without being registered, the facility still had coverage, therefore no lapse of the liability insurance occurred.

The facility did not have any records for the used oil and hazardous waste transportation training from the last three (3) years.

Employee Training records were not available on-site during the inspection. Compliance assistance was given, advising TG that employees must receive annual training which covers laws and regulations pertaining to used oil transporters under the Florida Administrative Code and the Federal Regulations, spill avoidance and emergency response procedures, and halogen testing.

Halogen Screening Procedure: Upon record review of the UO acceptance and delivery records, TG does not conduct halogen screening test when picking up from generators or delivering to the designated facility for processing, due to all the manifests having checked the "process knowledge" box. To ensure that the UO is not a hazardous waste under the rebuttable presumption [per 40 CFR 279.10(b)(1)(ii)], compliance assistance advised TG to determine whether the total halogen content of the UO being transported or stored at the facility is above or below 1,000 ppm [per 40 CFR 279.44(a)]. The Department advised that every shipment must be screened, every screening must be documented, and records must be kept for three (3) years [per 62-710.510(1) (d-g), FAC]. This corrective action was submitted to the Department on 08/30/19 via email, which demonstrated the halogen screening test being conducted on-site, and 2 acceptance records with the halogen screening test performed on it, both dated 08/28/19. The test that was used was Clor-D Tech 1000 by Dexsil, which is a disposal kit test for determining chlorine contamination in used oil.

TG did not demonstrate a SPCC plan at the time of inspection. Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures(SPCC) [as required on 40 CFR 279.45].

The facility displays a valid registration form and identification number in a prominent place of the facility (Photo#6) [pursuant to 62-710.500(4), FAC].

The facility submitted their UO Annual Report on 02/27/2019 to the Division. It demonstrates a total of 43,705 gallons of UO and oily water and 2,350 UO filters transported in the year of 2018.

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New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	279.42(a) , 62-710.500(1)
Explanation:	TG has been conducting the following activities without registration in accordance with State and Federal regulations: used oil transporter, used oil transfer facility. During the inspection, the inspectors observed TG was acting as a Transfer facility due to keeping its UO for more than 24 hours on-site, but less than 35 days. TG failed to transport UO with a valid registration for 19 days, from 07/01/19 to 07/19/19.
Corrective Action:	<p>Facilities conducting used oil transport and used oil transfer activities in Florida are required to obtain an EPA identification number and annually register their used oil handling activities with the Department. TG needs to provide the Department with documentation that it is a registered UOT, UOTF and Transfer facility and display registration on trucks.</p> <p>TG re-notified the Department on 07/19/19 as an UO transporter. Compliance assistance was provided and TG re-notified as a Transfer facility to the Department on 08/21/19.</p>
Type:	Violation
Rule:	279.44(a)
Explanation:	<p>Rebuttable Presumption</p> <p>To ensure that used oil is not hazardous waste under the rebuttable presumption, the used oil transporter must determine whether the total halogens content of used oil being transported or stored at transfer facility is below 1,000 ppm. TG failed to perform a total halogens screening of the used oil upon receipt from generators and /or upon delivery to Raider . No documentation for total halogens screening was available. TG oil manifests have checked " Process Knowledge" on the halogen test section.</p>
Corrective Action:	<p>Please, provide to FDEP a copy of the acceptance and delivery records including the result of total halogens screening for the first two (2) weeks of the facility being legally registered. Begin keeping acceptance and delivery logs with all appropriate information including halogen screening documentation.</p> <p>This corrective action was submitted to the Department via email on 08/30/19, which demonstrated two (2) manifests dated 08/28/19 with the halogen test performed on them.</p>
Type:	Violation
Rule:	279.45
Explanation:	During the time of the inspection, the facility could not demonstrate they had an SPCC/Contingency Plan implemented on site.
Corrective Action:	A SPCC was submitted via email to the Department on 08/23/19. The Department reviewed it and appeared to be complete.
Type:	Violation
Rule:	279.74(a)(3)
Explanation:	TG failed to have the transporter EPA ID on its delivery receipts.
Corrective Action:	The Department requested TG insert the transporter EPA ID on its receipts on 09/11/19. This corrective action was submitted to the Department on 09/13/19, via email.
Type:	Violation

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Rule: **62-710.401(6)**

Explanation: TG had two(2) 55-gallon UO drums, eight(8) 55-gallon oily water drums and three(3) 55-gallon drums of oily sludge on-site without a secondary containment.

Corrective Action: Compliance assistance was provided and on 08/21/19, TG submitted via email to the Department a PO for secondary containment to be placed under these drums. The picture of this corrective action was sent to the Department via email on 08/30/19.

Photo Attachments:

UO drums without secondary containment



UO drums with secondary containment



Type: Violation

Rule: **62-710.600(2)(c)**

Explanation: TG did not have any records on employee safety training from previous years on-site.

Corrective Action: On 08/23/19, TG submitted an employee safety training log to the Department as a corrective action.

PHOTO ATTACHMENTS:

Vacuum truck at oil department



Fire extinguisher at the oil department



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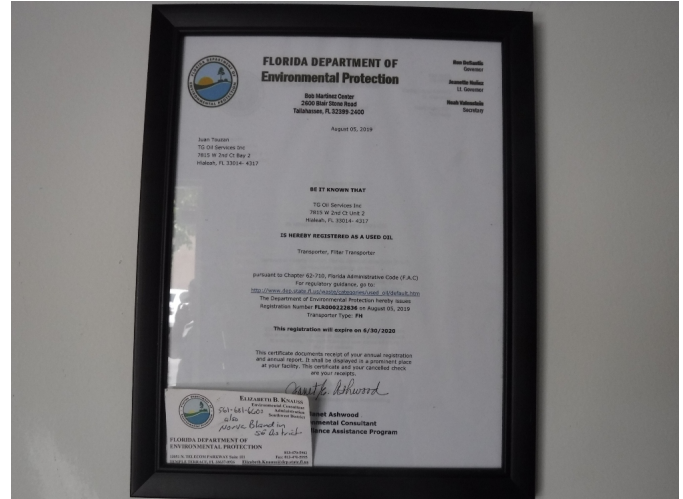
Spill kit at vacuum truck



New facility address



Registration letter from Department at display



Conclusion:

TG Oil Services was inspected as a Hazardous Waste Transporter, Used Oil Transporter, and Used Oil Filter Transporter, and it was found to be out of compliance with State and Federal regulations during the time of inspection. Based on the noncompliance issues discovered in the inspection, three (3) of them are considered to be potential significant non compliance.

TG transported UO without being registered for 19 days, from 07/01/19 to 07/19/19.

TG was acting as an UO transfer facility at the time of inspection without the proper registration.

The Department advised TG to re-notify the Department with regards to its current activities, and if TG elects to keep its HWT status, it must to comply with 40 CFR 263, or if it decides not to do so, it must re-notify using the 8700-12FL form.

On 08/21/19 TG re-notified with the Division via mail regards its activities and provided an electronic copy to SED for proof of submittal.

TG failed to determine if the UO is hazardous by omitting the halogen test from its procedures. Halogen tests performed on the UO acceptance records were submitted to the Department on 08/30/19, via email. UO, UO sludge and oily water containers were not compliant during inspection [per 62-710.401(6) FAC]. The Department requested this corrective action on 08/19/19, and on 08/22/19. TG submitted via email a PO of secondary containment primarily, and the picture of corrective action was submitted to the Department on 08/30/19.

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TG did not have any records of training from the last three (3) years. A FDEP approved Used Oil Transportation PowerPoint presentation was sent via email on 08/19/19 to be used for in-house training, as chosen. The facility returned to compliance on 08/23/19 by submitting copy of a training log, via email.

TG failed to have an SPCC plan on-site during the inspection. This corrective action was submitted to the Department via email on 08/23/19. It included emergency contacts and spill response procedures.

TG's contingency plan was not provided during the inspection. On 08/23/19, it was submitted to the Department via email.

TG failed to have its transporter EPA ID on its delivery records. The Department requested the transporter EPA ID be inserted on TG delivery records on 09/11/19. This corrective action was submitted to the Department on 09/13/19.

Due to the significant non compliance issues, the Department will issue a Warning Letter for this case.

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2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)	✓		

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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)	✓		

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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)	✓		
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

Juliana Reis**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**09/16/2019**Date**Justin Stark**Representative Name**Environmental Specialist II**Representative Title**DEP**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.

Romina Lancellotti**Representative Name**Environmental Specialist II**Representative Title**DEP**Organization**

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Erik Valiente**Representative Name**Safety Director**Representative Title**TG Oil Services**Organization**

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Report Approvers:**Approver:**Norva Blandin**Inspection Approval Date:**09/16/2019