



FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
561-681-6600

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

AGENDA

Thursday, September 26th, 2019

Meeting Location: Upper Chain of Lakes

Time: 11:00 AM – 12:00 PM

- **Introductions:**
 - EPA Directive/ DEP Protocol
 - Romina Lancellotti —Purpose of meeting
- **Inspection Report Discussion: Romina Lancellotti**
 - Inspection Report and DEP Findings
 - Review of violations and explanations
- **Warning Letter Discussion:**
 - Chem Klean Corp Response to Warning Letter—DEP Counterpoints
- **Expectations/ Conclusions/ Agreements**
 - Chem Klean Corp
 - DEP
- **Questions or concerns**



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Meeting Notes

Subject: Chem Klean Corp (EPAID FLR000231258) Enforcement Meeting

Date: September 26, 2019 from 11:00am to 12:00 pm

Location: Florida DEP Southeast District, Upper Chain of Lakes Room

- I. Introductions
 - a. Florida DEP Southeast District was represented by Norva Blandin, Environmental Administrator, Romina Lancellotti, Environmental Specialist II, and Justin Stark, Environmental Specialist II.
 - b. Chem Klean Corp was represented by Gregorio Nicolas Ramos, President, Christian Ramos, Vice President, and Jason Gross, Environmental Specialist.
- II. EPA Directive – Norva Blandin
 - a. Introduction and DEP/EPA protocol.
 - b. Current day of the case is 120 from discovery during the time of inspection.
- III. Case History and Discovery- Romina Lancellotti
 - a. The case began on May 29, 2019, during the time of a routine hazardous waste compliance evaluation inspection conducted by DEP to Chem Klean Corp, where the facility was found out of compliance with state and Federal regulations 62-710.500(1)(a) F.A.C. and 40 CFR 279.42(a).
 - b. After review of the documentation provided to the Department on 06/06/19, a new violation regarding 40 CFR 279.46(a)(2) was found.
 - c. A warning letter was sent to Chem Klean Corp on 08/12/19 and a meeting was requested to discuss it with the facility.
- IV. Chem Klean Representatives
 - a. Mr. Ramos exposed his position about the findings
 - i. The president was unaware of the missing checkmark (for used oil transfer facility) on the notification form submitted to the Department on 03/25/19. However, as soon it was addressed by the Department, Mr. Ramos submitted a new notification form on 05/30/19 and he mentioned that will do anything that is needed to comply with state and federal regulations.

- ii. Mr. Ramos stated that no used oil filters will be transported or stored in the facility. Therefore, the facility will not register as a used oil filter transfer facility.
 - b. Christian Ramos
 - i. Requested information about trainings offered by the Department in order to comply with all federal and state requirements.
- V. Violations and Penalties
 - a. DEP personnel shared copies of the proposed penalty calculations with the participants and explained to Chem Klean Corp representatives.
 - b. Norva Blandin explained violations that are considered significant non-compliance and the Guidelines for Characterizing Used Oil violations used to evaluate each violation. ELRA was used to evaluate each violation and to determine the penalties associated.
- VI. Resolution of Violations
 - a. The facility returned to compliance by submitting the requested documentation to the Department on 05/30/19 and 08/22/19.
 - b. During the meeting, Mr. Ramos agreed to pay the penalties associated to the violations and do what is requested by the Department in order to be in compliance.
 - c. A Short Form Consent Order will be drafted and prepared within 7 days.

Prepared by: Romina Lancellotti - Environmental Specialist II CAP



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Date: 09/26/19

Program: HAZARDOUS Waste

Meeting Subject: DEP Meeting with ChemKlean Corp

Meeting Room: Upper Chain of Lakes No. of Participants: 6 Telephone: _____ Voice Point: _____

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