From:	Lancellotti, Romina
To:	cgregory@wpcorp.net; avmirand@wpcorp.net
Cc:	Blandin, Norva
Subject:	World Petroleum (EPA ID FLD980709075)- Exit Interview
Date:	Friday, November 15, 2019 12:30:00 PM

Good afternoon,

This email serves as follow up to the hazardous waste compliance evaluation inspection conducted on October 31, 2019, by the Florida Department of Environmental Protection (FDEP). Thank you and your team for taking the time to assist us during the inspection. The inspection revealed the following noncompliance items (also discussed during the inspection) and corrective actions required:

Acceptance/Delivery Records Manifests: Based on record review during the time of inspection, the inspectors discovered that World Petroleum has accepted and delivered hazardous waste and failed to comply with hazardous waste transporter requirements under 62-730.171F.A.C.

The transporter who is owner or operator of a transfer facility which stores manifested shipments of hazardous waste for more than **24 hours but 10 days or less** (hereinafter referred to as "the transfer facility") shall obtain an EPA/DEP identification number for each transfer facility location and notify the Department using Form 62-730.900(1)(b), "8700-12FL – Florida Notification of Regulated Waste Activity,", pursuant to 62-730.171(2)(a).

1. During the time of inspection, the inspectors found the manifest tracking number 019087930JJK that indicates that on 07/15/19 World Petroleum accepted one (1) 55-gallon drum of hazardous wastes (EPA waste codes D001, D035, F003, F005) from the generator, and delivered it at Stericycle (transporter 2) on 07/17/19. Based on this information, World Petroleum kept hazardous waste <u>more than 24 hours</u>.
2. The manifest tracking number 019087919JJK indicates that on 03/08/19 World Petroleum accepted one (1) 55-gallon drum of hazardous waste (EPA waste code D001) from the generator, and delivered it at Stericycle (Transporter 2) on 03/11/19. Based on this information, World Petroleum kept hazardous waste <u>more than 24 hours</u>.

Pursuant to 62-730.171(1) If the waste is stored for **more than 10 days**, the facility is subject to the permitting requirements for a hazardous waste storage facility.

3. During the time of inspection, the inspectors observed the manifest tracking number 015912473JJK that indicates that on 01/04/17 World Petroleum (EPA ID FLD980709075) accepted one (1) 55-gallon drum of hazardous waste, EPA waste codes F003, F005, D001 from the generator, and delivered it at Stericycle (Transporter 2) on 01/27/19. Based on this information, World Petroleum Corp kept hazardous waste <u>more than 10 days</u>.

During the time of inspection, Mr. Chad Gregory stated that the hazardous waste has been delivered to the transporter 2 within 24 hours. World Petroleum may have supporting documentation to probe that the discrepancies discovered during the time of inspection are not accurate.

- Please provide supporting documentation that demonstrates that the waste was delivered within the time frame required for HW transporters under 40 CFR 263 and 62-730, F.A.C.

Waste Analysis Plan: According to 40 CFR 279.55, owners of used oil processing must develop and follow a written Analysis Plan describing the procedures that will be used to comply with the analysis requirements of 40 CFR 279.53 and 279.72.

- Please provide a copy of the Waste Analysis Plan to the Department.

Current Liability Insurance: Based on record review during the time of inspection, the inspectors confirmed that the facility holds a current liability insurance; however, the updated Acord form has not been submitted to the Department.

- Please provide proof of submission of current liability insurance to the Department even though it was confirmed that WP does not have any lapse in their liability insurance.

Please submit the above information requested within 14 calendar days of this email **(11/29/2019)**. If you have any questions or concerns, you may contact me at this email address or the phone number below.

Best Regards,

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