

# FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office 13051 North Telecom Parkway #101 Temple Terrace, Florida 33637-0926 Ron DeSantis Governor

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

December 19, 2019

Kevin & Merry Allen, Owners Anywhere Fleet Repair, LLC. 3242 Fox Ridge Blvd., Zephyrhills, FL 33543 Num1grouch@aol.com

Re: In Compliance Letter Anywhere Fleet Repair, LLC. FLR000188151 Pasco County

Dear Mr. & Mrs. Allen:

Department personnel conducted a compliance inspection of the above-referenced facility on December 16, 2019. Based on the information provided during the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your record.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Abigail Bridges at (813) 470-5787 or via e-mail at <u>Abigail.Bridges@floridadep.gov</u>.

Sincerely,

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Shannon Kennedy Environmental Manager Compliance Assurance Program Florida Department of Environmental Protection

Enclosures: Inspection Report (with attachments)

ec: Shannon Kennedy, FDEP-SWD, <u>Shannon.Kennedy@FloridaDEP.gov</u> Abigail Bridges, FEP-SWD, <u>Abigail.Bridges@FloridaDEP.gov</u> Alicia Hacker, Pasco County, <u>ahacker@pascocountyfl.net</u> Bill Rodriguez, Pasco County, <u>wrodriguez@pascocountyfl.net</u> Merry Allen, Anywhere Fleet Repair, <u>anywhereii@aol.com</u> Kevin Allen, Anywhere Fleet Repair, <u>anywherefleet@gmail.com</u>



Florida Department of

**Environmental Protection** 

**Hazardous Waste Inspection Report** 

#### **FACILITY INFORMATION:**

Facility Name:Anywhere Fleet Repair, LLCOn-Site Inspection Start Date:12/16/2019ME ID#:104582EPA ID#:Facility Street Address:3242 Fox Ridge Blvd, Zephyrhills, Florida 33543-5143Contact Mailing Address:3242 Fox Ridge Blvd, Zephyrhills, Florida 33543-5143County Name:PascoContact Phone: (813) 714-3891

NOTIFIED AS: Non-Handler, Used Oil

WASTE ACTIVITIES: Generator: Non-Handler Used Oil: Oil Filters

#### **INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility Routine Inspection for Used Oil Transfer Facility Facility Routine Inspection for Non-Handler Facility

#### **INSPECTION PARTICIPANTS:**

 Principal Inspector:
 Abigail B Bridges, Inspector

 Shannon Lenhart, Environmental Specialist I; Merry Allen, Co-Owner; Kevin Allen, Co 

 Other Participants:
 Owner

#### LATITUDE / LONGITUDE: Lat 28° 12' 16.0891" / Long 82° 17' 7.1435"

NAIC: 811111 - General Automotive Repair

#### TYPE OF OWNERSHIP: Private

#### Introduction:

The Florida Department of Environmental Protection - Southwest District (Department) conducted a routine inspection of Anywhere Fleet Repair, LLC. on December 16, 2019 to evaluate the facility's compliance with state and federal regulation applicable to used oil and used oil filter transporters and transfer facilities. Anywhere Fleet Repair is a mobile vehicle lube and maintenance business operated by Kevin and Merry Allen. As part of the business operations, Mr. Allen transports used oil and used oil filters generated during oil changes. These are stored pending pickup by another registered used oil transporter. In general, the business transports less than 55 gallons of oil at any one time. However, Mr. Allen registered as a used oil transporter as he may occasionally transport more than 55 gallons of used oil at a time when operating outside of Pasco County.

#### **Process Description:**

Company equipment is transported to job sites in a box trailer. Two labeled 55 gallon used oil drums and one 35-gallon drum of used oil filters are located within secondary containment in the trailer, along with one 55-gallon drum of new oil and lead acid batteries. If the used oil volume exceeds drum capacity, small containers are used to transport the oil. Mr. Allen does not transport USDOT regulated hazardous materials.

From the trailer, used oil is transferred to a 275-gallon, labeled single walled above ground tank located in a metal shed. The tank is secondarily contained within a 360-gallon black PIG tank spill containment unit. If excess oil is accumulated, it is stored in labeled 55-gallon drums. Used oil filters are also stored inside the shed in labeled 55-gallon drums, all within adequate secondary containment. The shed also held a tank and several drums of virgin lube oil.

#### Inspection Date: 12/16/2019

Shipping documents and manifests were reviewed. Used oil is picked up and transported by Heritage Crystal Clean in Tampa approximately every three months. All documents reviewed were properly filled out and no discrepancies were noted. The facility submitted their 2019 annual report in February of 2019, prior to the March 1st deadline, and the registration and insurance policy were up-to-date and adequate. Crushed used oil filters are sent for recycling at a local recycling center. Emergency spill kits were observed within the box trailer and the metal shed.

#### PHOTO ATTACHMENTS:

Used Oil Tank



#### **Conclusion:**

At the time of the inspection, the facility was operating in compliance with state and federal regulations applicable to used oil and used oil filter transporters and transfer facilities.

#### **1.0: Pre-Inspection 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.	tem No. Pre-Inspection Review		No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	1		
1.2	1.2 Has the facility notified of change of status? 62-730.150(2)(b)			1
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			1

#### 5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	1		
5.2	5.2 Are used oil containers/tanks in good condition? 279.22(b)(1)			
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	1		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	1		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			1
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	1		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	1		
5.10	5.10 Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)			
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	12 Closed or otherwise protected from the weather? 62-710.401(6)			1
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)			
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			1
5.16	contain the released oil? 279.22(d)(2)			1
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			1
5.18	<ul> <li>5.18 if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)</li> <li>5.19 Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)</li> </ul>			1
5.19				
5.20	5.20 Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			
Item No.	Used Oil Filter Container Management	Yes	No	N/A

			1	
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	1		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	1		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	1		
5.24 Are the used oil filter containers not leaking? 62-710.850(5)(a)		1		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	1		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	1		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			1
5.29	contain the released oi62-710.850(5)(b)			1
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)(b)			1
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4			1
Item No.	Used Oil Mixtures	Yes	No	N/A
	Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	☐ Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			1
	☐ Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			1
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the			1
5.37				
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			1
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free- flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			-
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			~
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			1

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nem no.	Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so,	163		
Item No.	Marketing and Processing	Yes	No	N/A
5.60	refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2) Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			
	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			1
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual			
5.57	5.57 Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			1
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			1
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			1
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	1		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			-
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			1
5.50	5.50 Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	1		
Item No.	Off-site Shipments	Yes	No	N//
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			-
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			-
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
ltem No.	Space Heaters	Yes	No	N/A
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			~
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			~
	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			

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CFR 279 Subpart H.]		
Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil		
processor subject to 40 CFR 279 - Subpart F.]		

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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.

Abigail B Bridges	Environmental Specialist I			
Principal Investigator Name	Principal Investigator Title			
Balan	FDEP-SWD 12/17/2019			
Principal Investigator Signature	Organization Date			
Shannon Lenhart	Environmental Specialist I			
Inspector Name	Inspector Title			
	FDEP-SWD			
	Organization			
Merry Allen	Co-Owner			
Representative Name	Representative Title			
	Anywhere Fleet Repair, LLC.			
	Organization			
	presentative only acknowledges receipt of this Inspection Report the items identified by the Department as "Potential Violations" or			

areas of concern. Kevin Allen Co-Owner Representative Name Representative Title Anywhere Fleet Repair, LLC. 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.

#### **Report Approvers:**

Approver:	Shannon Kennedy	Inspection Approval Date:	12/17/2019
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