



FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
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Ron DeSantis
Governor

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Lt. Governor

Noah Valenstein
Secretary

MEETING DOCUMENTATION

Attendees: Andrea Miranda, Chad Gregory, John Jones, Jared Heyns, Norva Blandin, Alannah Irwin, Romina Lancellotti, Carlos Grajeda.	Location: Teleconference / Skype	Date/Time: 04/02/2020 – 12:00 to 1:00 pm
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Prepared by: Carlos Grajeda

Meeting Requested by: Florida Department of Environmental Protection (FDEP) – Southeast District (SED)

Meeting Objectives:

A Warning Letter (WL#20-00009HW06SED) was sent to World Petroleum Corp. (WPC) on January 21, 2020 which requested a meeting to discuss the Department's compliance evaluation inspection conducted on October 31, 2019 at WPC. During this inspection, five violations were cited for the Hazardous Waste Program.

Notes:

The teleconference meeting was conducted at 12:00 pm on 04/02/2020. All listed participants participated via teleconference.

Introduction was given by Norva Blandin and Carlos Grajeda on behalf of FDEP.

Discussion of the violations:

Department personnel discussed the findings of the Violation No. 1 and Violation No. 5 that were cited. It was noted that all violations have been resolved, three at the time of the inspection.

Violation No. 1:

WPC stated that the drum was on the vehicle, never stored at the facility and in transit. The drum had no leakage or damage, therefore no environmental harm was made.

FDEP personnel shared the 'transfer facility' definition found in 40 CFR Part 260.10. and explained that 'a container in transit' is not applicable under RCRA regulations. To avoid future violations, FDEP requested the facility to register as a Hazardous Waste Transfer Facility, but not requiring to register as a permitted Transfer Storage and Disposal Facility.

WPC accepted to submit the notification to register as a Hazardous Waste Transfer Facility.

Violation No. 2 – 4:

The Department stated that the Universal Waste Lamps violations were corrected on site and agree with the findings of the Department.

Violation No. 5:

No questions and comments were discussed during the meeting.

Penalty calculation worksheet discussion:

FDEP told the facility that history of non compliance was not taken into consideration, though it should be taken into consideration as the last enforcement meeting was on 2017 and within the past five years. This action was taken because FDEP wants to seek a settlement and return the facility into compliance.

Facility stated that in Violation No. 5 there was no environmental harm, disposing the drums in a proper way. WPC explained that they have made changes to the logging system and pick up procedures. WPC will not pick up any shipment before verifying that they can deliver it to the TSDF within the next few hours.

FDEP requested any standard operational procedures (SOPs) or actions that the facility has implemented to avoid recalcitrant violations in the future. The facility must submit the Transfer Facility Notification to the Department. This documentation will be the justification in order to reclassify the violations No. 1 and No. 5 based on the OGC Guideliness and evaluated with the Assistant Director of FDEP.

Agreements/Conclusions:

A documentation review will be conducted to determine the reclassification of hazardous waste transfer facility violations.

During the meeting, WPC representatives agreed to provide documentation:

- Pertaining the notification of WPC as a Hazardous Waste Transfer Facility.
- Any standard operational procedures (SOPs) or actions that the facility has implemented to avoid recalcitrant violations in the future.

Follow-up Actions/Dates:

SED will send a letter requesting additional information. After the letter is sent, WPC will have 15 days to provide SED with the requested information, and the Department will evaluate and review the submittals for further actions.