From: Stark, Justin

To: <u>jenglin@synergyrecycling.org</u>

**Subject:** Exit Interview - Ricky"s Oil (EPA ID: FLD981019755)

**Date:** Thursday, July 2, 2020 1:27:00 PM

## Good afternoon Jeff,

This email serves as an exit interview for the Compliance Evaluation Inspection ("CEI") conducted on Tuesday, June 30, 2020 by the Florida Department of Environmental Protection ("Department") to determine compliance with federal and state regulations for hazardous waste.

The following corrective actions are required.

- 1. **Arrangements with local authorities:** Per 40 CFR part 279.52(b)(3)(ii), A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. During the inspection, the facility had made revisions to its contingency plan but has not submitted it to local authorities. <u>Please provide documentation demonstrating that arrangements have been made</u>.
- 2. **Primary emergency coordinator:** Per 40 CFR 279.52(b)(2)(iv) The contingency plan must list names, addresses, and phone numbers(office and home) of all persons qualified to act as emergency coordinator (see paragraph (b)(5) of this section), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. During the inspection, the inspector observed that two emergency coordinators have been assigned to the facility. However, there was no indication of who the primary was. Please designated a primary emergency coordinator and provide a copy to the Department.
- 3. **Permit requirements**: Per the facility's permit. The facility shall keep the permit and all related supporting documentation onsite. During the inspection, the inspector was not able to review the facility's permit or waste analysis plan. <u>Please ensure the aforementioned documentations are kept onsite in the future</u>.

## Records:

1. Please provide any additional emails from Janet Ashwood in regards to the facility's registration and insurances.

Please provide the corrective actions and records within fourteen days **(07/16/2020)**. If you have any questions or concerns, please do not hesitate to contact me.

Regards,



Justin Stark
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Office: 561.681.6648

From: Stark, Justin

To: jenglin@synergyrecycling.org

Subject: Ricky's Oil & Environmental Services, LLC

Date: Monday, June 15, 2020 4:09:00 PM

Good afternoon Mr. Englin,

As discussed during last weeks' telephone conversation, I am contacting you because your facility Ricky's Oil & Environmental Services, LLC located at 7209 NW 66<sup>th</sup> Street, Miami, FL 33166 (EPAID FLR391019755) is selected for a hazardous waste inspection by the Department this quarter. This inspection would cover all requirements pertaining to the facility's permit (61835-008-HO; 61835-009-SO) which was issued on April 23, 2018 and expires on November 25, 2022, and Title 40 Code of Federal Regulations (CFR) part 279 and Rule 62-710 Florida Administrative Code (FAC). I will be conducting an inspection of the aforementioned site on June 30, 2020.

In these difficult times due to COVID-19, the Department would like to request records ahead of time before the inspection, that way when I conduct my on-site inspection I can do a quick walk through of the facility and review records either before or after the inspection back at the office.

The following records are required for review as described in the facility's permit, 40 CFR 279, and 62-710 FAC:

- 1. Acceptance and delivery records for all used oil activities
- 2. Used oil annual report
- 3. The most recent used oil handler certification of liability insurance
- 4. The facility's closing cost estimate and closure plan
- 5. The facility's waste analysis plan
- 6. Initial and annual training records
- 7. Records of monthly/weekly inspections of the facility's ASTs, main storage area, and equipment
- 8. The facility's Spill Prevention, Control, and Countermeasure (SPCC) Plan
- 9. The facility's Contingency Plan
- 10. Records of arrangements made with local authorities
- 11. Records of any rejected shipments
- 12. Records of the total amount of oil contaminated solid waste delivered, processed and

disposed of.

Since the facility was inspected back in the beginning of 2019, please provide all records from January 2019 to the present. Please provide the above mentioned records by the  $28^{th}$  of this month (06/28/2020). The Department really appreciates your cooperation. If you have any questions or concerns, please do not hesitate to contact me.

## Regards,



Justin Stark Environmental Specialist II

Compliance Assurance Program – Hazardous Waste and Solid Waste Florida Department of Environmental Protection Southeast District 3301 Gun Club Road, MSC 7210-1 West Palm Beach, FL 33406

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