



Florida Department of  
Environmental Protection

Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Drew Fuel Services Inc  
**On-Site Inspection Start Date:** 08/18/2020      **On-Site Inspection End Date:** 08/18/2020  
**ME ID#:** 141581      **EPA ID#:** FLR000235903  
**Facility Street Address:** 1862 NW 21st St, Pompano Beach, Florida 33069-1306  
**Contact Mailing Address:** 1862 NW 21st St, Pompano Beach, Florida 33069  
**County Name:** Broward      **Contact Phone:** (954) 306-6853

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Used Oil:** Transporter, Oil Filters

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Hazardous Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Justin Stark, Inspector  
**Other Participants:** Jonathan Drew, President & CEO

**LATITUDE / LONGITUDE:** Lat 26° 15' 23.1948" / Long 80° 8' 54.8052"

**NAIC:** 562998 - All Other Miscellaneous Waste Management Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On August 18, 2020, Justin Stark with the Florida Department of Environmental Protection ("FDEP") conducted a Compliance Evaluation Inspection ("CEI") at Drew Fuel Services Inc (hereinafter "DFS" or "facility"), located at 1862 NW 21st St, Pompano Beach, FL 33069. DFS was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations ("C.F.R.") Parts 260-268, 273, and 279, adopted and incorporated by reference in Rule 62-710, 62-730, and Rule 62-737, Florida Administrative Code ("F.A.C.").

The inspector was escorted around the facility by Jonathan Drew, President. Upon arrival at the facility, the inspector presented their credentials and explained the purpose of the inspection.

DFS is situated on a 30,411 square foot property and is connected to municipal water and sewer. DFS has been operating at this location since September 2019 and employs 6-12 staff.

**Notification History:**

DFS notified the FDEP as a transporter for Petroleum Contact Water ("PCW"), Used Oil (UO), Used Oil Filters (UOF) and Hazardous Waste when the facility commenced operations at this location and was assigned the EPA Identification Number ("EPAID") FLR000235903. DFS initially notified at 4101 Ravenswood Rd #309, Ft Lauderdale, FL 33312 on 10/23/2012 as a Small Quantity Generator, transporter for PCW, UO, UOF, and Hazardous Waste.

**Inspection History:**

The facility was inspected at the old location (4101 Ravenswood Rd #309, Ft Lauderdale, FL 33312) and was found to be in compliance. The facility has not been inspected by FDEP at this location.

## Drew Fuel Services Inc Inspection Report

Inspection Date: 08/18/2020

Personal Protective Equipment (PPE) was not required to enter the facility. Department personnel were equipped with steel-toed boots and a facial mask.

### Process Description:

Drew Fuel Services, Inc. operates as a fuel tank service and offers services such as Petroleum Testing, Petroleum Removal, Petroleum Tank Cleanings, Petroleum Recycling, Fuel Polishing/Petroleum Filtration, Fuel Remediation and Fuel Management.

The facility consists of a Office Space, Warehouse, and a Yard where the facility stores its fleet vehicles.

#### Office Space:

The facility conducts administrative task in this area. No hazardous waste or used oil is was observed here.

#### Warehouse:

This part of the facility is attached to the office where products, spill kit materials, and flash point and fuel quality is tested. The facility uses a machine that cleans and tests diesel fuel. The facility takes this with them during its operations. During the operations, the facility attaches tubes from the tank (which will be cleaned) to the diesel fuel cleaner, and from the diesel fuel cleaner to a fleet vehicle. Once the tank has been cleaned the diesel fuel is pumped back from a fleet vehicle to the diesel fuel cleaner and than to the tank (which was cleaned). This is considered a closed loop system thus the diesel fuel does not became a solid waste. Compliance Assistance was provided on the proper management and disposal for the filter. Pursuant to 40 CFR part 262.11, A person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

No hazardous waste or used oil is was observed here.

#### Front Yard:

The yard is used for storage of empty totes and drums, the facility also stores its fleet vehicles here.

#### The inspector observed:

- > 7 empty 55-gallon drums
- > 4 empty 250-gallon totes
- > 2 box trucks
- > 3 2,800 gallons large capacity trucks

All vehicles had their DOT and EPA numbers displayed on the sides. Spill kits and first aid kits are also stored in each vehicle.

#### Records Review:

Shipment records for the last three years were available for review. The inspectors reviewed the following:

> Acceptance and Delivery Records - PCW, oily water and UO are taken to Raider Environmental Services (EPA ID: FLR000143891) who is registered with the FDEP as permitted used oil processor, hazardous waste, UO, and UOF transporter. The inspector observed that the facility was missing the designation facility on some of its non-hazardous manifests, specifically the ones where PCW or oily water were transported. Compliance Assistance was offered and the facility stated it will ensure it includes the designation facility on all of its manifests.

Any sludges or spent fuel that's generated from the facility operations is tested [40 CFR part 262.11] and disposed of in accordance with the results. The facility keeps analyticals and waste profiles onsite. However, most of the waste the facility transports is oily water and PCW.

>Employee Training Records - All employees receive initial and annual training on the proper management of used oil, including handling, storage, and spill response and cleanup. The facility maintains these records on-site for 3 years in accordance with Rule 62-710.600(2)(b) F.A.C.

# Drew Fuel Services Inc Inspection Report

Inspection Date: 08/18/2020

>Rebuttable Presumption Records - The facility tests each UO shipment to ensure that the total halogen content being transported is below 1,000 parts per million (ppm). The facility uses a Clor-D-Tect 1000 Chlorine Halogen Test Kit manufactured by Dexsil Corporation for halogen testing. Halogen testing records are kept on-site for at least three years, in accordance with 40 CFR part 279.44(d).

## PHOTO ATTACHMENTS:

### 1. Registrations Displayed



### 2. Box Trucks



### 3. Tanker



## Conclusion:

DFS was inspected as a transporter for UO, UOF, and hazardous waste and found to be in compliance during the time of the inspection.

Compliance Assistance was provided for ensuring the facility conducts a waste determination on the filters used to clean the diesel fuel [40 CFR part 262.11] and to ensure it includes the designation facility on all its manifests.

## Drew Fuel Services Inc Inspection Report

Inspection Date: 08/18/2020

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

# Drew Fuel Services Inc Inspection Report

Inspection Date: 08/18/2020

## 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

<u>Justin Stark</u> <b>Principal Investigator Name</b>	<u>Environmental Specialist II</u> <b>Principal Investigator Title</b>
<hr/> <b>Principal Investigator Signature</b>	<u>FDEP</u> <b>Organization</b>
	<u>09/22/2020</u> <b>Date</b>
<u>Jonathan Drew</u> <b>Representative Name</b>	<u>President &amp; CEO</u> <b>Representative Title</b>
	<u>Drew Fuel Services Inc</u> <b>Organization</b>

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:

<b>Approver:</b> <u>Alannah B Irwin</u>	<b>Inspection Approval Date:</b> <u>09/22/2020</u>
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