FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
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West Palm Beach, FL 33406
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Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

January 8, 2021

Chad Gregory, Manager
3650 SW 47th Ave,
Davie, Florida 33314
cgregory@wpcorp.net

Re: World Petroleum Corp. - In Compliance Letter
EPA ID FLD980709075
Broward County

Dear Mr. Gregory:

Department personnel conducted a compliance evaluation inspection of the above-referenced facility on December 3, 2020. Based on the information provided during the inspection, the facility was determined to be in compliance. A link of the inspection report is attached for your records.

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 Carlos Grajeda at (561) 681-6670, or via e-mail at: carlos.grajeda@floridadep.gov

Sincerely,

Alannah Irwin
Environmental Manager
Compliance Assurance Program (CAP)
Southeast District

AI/cg

Oculus Link: Hazardous Waste Final Inspection Report

cc: Andrea Miranda avmiranda@wpcorp.net – World Petroleum Corp.
Eric Miranda emiranda@wpcorp.net – World Petroleum Corp.
Alannah Irwin, Carlos Grajeda – FDEP

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: World Petroleum Corp

On-Site Inspection Start Date: 12/03/2020 **On-Site Inspection End Date:** 12/03/2020

ME ID#: 50795 **EPA ID#:** FLD980709075

Facility Street Address: 3650 SW 47th Ave, Davie, Florida 33314

Contact Mailing Address: 3701 SW 47th Ave Ste 101, Davie, Florida 33314

County Name: Broward **Contact Phone:** (954) 327-0724

NOTIFIED AS:

Non-Handler, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste **Used Oil:** Off-Spec, Oil Filters, Processor **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Carlos Grajeda, Inspector

Other Participants: Mario Vergara, Sales Manager

LATITUDE / LONGITUDE: Lat 26° 4' 34.1948" / Long 80° 12' 33.0274"

NAIC: 324191 - Petroleum Lubricating Oil and Grease Manufacturing

TYPE OF OWNERSHIP: Private

Introduction:

On December 3, 2020, Carlos Grajeda with the Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) at World Petroleum Corp. (hereinafter WPC or facility), located at 3650 SW 47th Ave., Davie, FL 33314. WPC was inspected to determine the facility's compliance with the state and federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.).

The inspector was escorted around the facility by Mario Vergara, Sales Manager. Upon arrival at the facility the inspector presented their credentials and explained the purpose of the inspection.

WPC occupies one acre and is connected to public water and portable toilets. WPC has been operating at its current location since 2007 and employs 15 staff. WPC is a permitted Used Oil and a Material Processing Facility, permit numbers 54228-008-HO and 54228-009-SO, expiration date 12/12/2023.

Notification History

WPC initially notified with the Department as a used oil transporter on 03/07/1983. The facility was assigned the EPA Identification (EPAID) FLD980709075. The facility most recently notified as a hazardous waste transporter, universal waste transporter, small quantity handler of universal waste and mercury-containing devices, Petroleum Contact Water (PCW) transporter, used oil transporter, used oil transfer facility, used oil processor (on spec), used oil filter transporter, used oil transfer, and used oil filter processor on 10/14/2020.

Inspection History

The facility was previously inspected by the Department on 10/31/2019 as a Used Oil Processor Facility, Used Oil Transporter Facility, Used Oil Transfer, Used Oil Marketer, Hazardous Waste Transporter and Universal Waste Transporter and was found to be out of compliance at the time of the inspection for failure to: Failure to comply with hazardous waste transporter requirements by exceeding the 24-hour storage limit of hazardous waste, act as an unpermitted Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) by exceeding the 10-day storage limit for hazardous waste transfer facilities and other potential non-compliance issues pertaining, but not limited to, hazardous waste container storage and labeling practices. The case was resolved through Enforcement.

Personal Protective Equipment (PPE) was required to enter this facility. The inspector was equipped with safety boots and face mask throughout the inspection.

Process Description:

WPC transports hazardous waste from generator facilities to a second transporter, Stericycle (EPA ID FL0000702985), for hazardous waste only. WPC also transports used oil, oily water, used oil filters, PCW, and oily solid waste (rags and absorbents). The facility is also authorized to process used oil, used oil filters, oily water, solid waste, and to collect and transport PCW. WPC does not manage pharmaceutical wastes.

The facility consists of a tank farm, used oil filters and oily solid waste storage, designated areas for empty container storage, parking for the facility's fleet vehicles, and two small outbuildings: Office and Laboratory, and the other building is used as a maintenance shop in which minor repairs on fleet vehicles are made.

WPC maintains a fleet of 20 trucks that includes 3 vacuum trucks, a vactor truck, 4 tractor trailers, 9 pump trucks, box trucks, and pickups trucks. WPC fleet vehicles are used to transport used oil, PCW, oily water, used oil filters, oily waste; to pump out, vacuum, and transport used oil or oily water; and to transport hazardous waste and solid waste with the box trucks.

Tank Farm and Used Oil Processing

Used oil and oily wastewater are received in the tank farm area located in the southeast corner of the facility. Used oil is offloaded into Aboveground Storage Tanks (ASTs) located in the tank farm. The used oil is filtered, and then allowed to sit for further oil/water separation. The processed oil is tested for compliance with on-specification standards and is sold as fuel oil to WPC customers.

The inspector observed the following ASTs in the tank farm:

-One 30,000-gallon tank for used oil labeled with the words “Used Oil” and the number 1.
-One 6,000-gallon tank for diesel fuel, labeled with the number 2.
-One 30,000-gallon tank for used oil, labeled with the words “Used Oil” and the number 3.
-One 20,000-gallon tank for oily water, labeled with the number 4.
-One 20,000-gallon tank for used oil, labeled with the words “Used Oil” and the number 5.
-One 20,000-gallon tank for oily water, labeled with the number 6.
-One 20,000-gallon tank for used oil, labeled with the words “Used Oil” and the number 7.
-One 20,000-gallon tank for oily water, labeled with the number 8.
-One 20,000-gallon tank for used oil, labeled with the words “Used Oil” and the number 9.
-One 20,000-gallon tank for oily water, labeled with the number 10.

All the tanks listed above were observed within secondary containment of 50,000-gallon capacity and were properly labeled.

Storage Area

During the inspection, the inspector observed:

-80 55-gallon metal containers holding UOFs, labeled as “Used oil filters”
-One 20-yard roll-off container holding crushed filters, labeled as Used Oil Filters for Recycling”

The Storage area is located within a secondary containment, all used oil leaks are collected in a oil separator sump located at the northwest side of the property.

Preparedness and Prevention measures including eye wash areas, fire extinguishers, an internal communication system, and spill kits were observed on-site. WPC also conducts weekly and daily inspections for their tanks and secondary containment areas, while also keeping documentation on-site for review.

DOT placards were displayed with the US DOT1118579FL on the side of all trucks. The transporters keep copies of the following of the on each truck: Operations Manual of WPC, Liquid Waste Transporter Permit #LW-000722-2019/2020, the Hazardous Material Management Facility License #ST-00038-19, Spill Prevention and Response Plan, certificate of liability insurance, and blank manifest forms. The trucks are also properly identified and registered as hazardous waste, used oil, and universal waste transporters and have spill kits and fire extinguishers available.

Records Review

Disposal Records

- Used oil, used oil antifreeze, used oil filters, oily water, and oily rags: Pick-up and delivery records for the last year were provided for review during the inspection. Crushed UOFs are shipped as scrap metal to US Foundry (EPA ID FLD004128336), a permitted facility in Miami authorized to recycle used oil filters.

-Hazardous waste: WPC receives hazardous waste and employs Stericycle (EPA ID FL0000702985) as a transporter 2 for the delivery of hazardous waste, and Allworth, LLC. (EPA ID ALD094476793) as the designated facility, located at 500 Medco Rd, Birmingham, AL 35217. All information within the hazardous waste manifests were complete.

- Contingency Plan - The facility was able to provide a hard copy of their current Contingency Plan during the inspection. Last revision occurred on 03/14/2018, but no changes have been made since the last arrangement with local authorities was made on 08/14/2017. All elements required by rule were included in the Contingency Plan including: Closure Plan, Waste Analysis Plan (WAP), and Emergency Response Procedures.

-The last three years of the facility’s annual financial reports, specifically for its Used Oil Processing Facility Closing Cost Estimate Forms, were available for review during the inspection and also submitted to the Department. The Closing Cost Estimate forms appeared to be complete and in order at the time of the inspection.

-The facility conducts daily tank inspections, and the associated daily inspection checklists were available for review during the inspection. The inspection checklists included: General housekeeping, security and fire safety, leaks, bonding cables, fire extinguishers, pipe surfaces, Safety Data Sheet (SDS), and Spill Prevention Control and Countermeasure (SPCC) Plan.

- Employee Training - All employees receive initial and annual hazardous waste and used oil training, which includes training on the proper handling of hazardous waste, used oil handling, storage, and spill cleanup. The facility also maintains records of the Used Oil Transporter certification and the hazardous waste transporter training for each of their employees. The last training was conducted on 11/05/2020.

PHOTO ATTACHMENTS:

World Petroleum Corp Inspection Report

Inspection Date: 12/03/2020

Photo No. 1: Truck (USDOT 1118579FL)



Photo No. 2: 20-yard roll-off container holding crushed filters



Photo No. 3: Tank Farm



Photo No. 4: Laboratory Area



Conclusion:

WPC was inspected as an Used Oil Processor Facility, Used Oil Transporter Facility, Used Oil Transfer, Used Oil Marketer, Hazardous Waste Transporter and Universal Waste Transporter and was found to be in compliance.

An exit interview was sent on 12/14/2020. The facility was provided with a deadline of 12/21/2020 to submit the required documentation. No further action is needed at this point.

6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)	✓		
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)	✓		

6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)	✓		
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)	✓		
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)	✓		
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)	✓		
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)	✓		
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)	✓		
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)	✓		
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)	✓		
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)	✓		
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)	✓		
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)	✓		
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31	✓		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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

Carlos Grajeda	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	01/05/2021
Principal Investigator Signature	**Organization**	**Date**

Mario Vergara	Sales Manager
Representative Name	**Representative Title**
	World Petroleum Corp.
	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:	Alannah B Irwin	**Inspection Approval Date:**	01/06/2021