



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: United States Environmental Services LLC
On-Site Inspection Start Date: 11/19/2020 **On-Site Inspection End Date:** 11/19/2020
ME ID#: 140771 **EPA ID#:** FLR000234518
Facility Street Address: 9111 Untreiner Ave, Pensacola, Florida 32534-1888
Contact Mailing Address: 14950 Heathrow Forest Pkwy #470, Houston, Texas 77032
County Name: Escambia **Contact Phone:** (281) 606-4960

NOTIFIED AS:

Non-Handler, Transporter, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Monica Hardin, Inspector
Other Participants: Nicole Hetzel, Environmental Specialist; Michael Moore

LATITUDE / LONGITUDE: Lat 30° 31' 47.7912" / Long 87° 16' 50.358"

NAIC: 562910 - Remediation Services

TYPE OF OWNERSHIP: Private

Introduction:

United States Environmental Services LLC (USES) located at 9111 Untreiner Ave in Pensacola, Florida has been a registered universal waste (UW), hazardous waste (HW), and used oil (UO) transporter since 2017. The facility moved to this location from 4040 Ashland Ave. (FLD984255570) since the previous inspection. The Department received the facility's notification of this change on April 10, 2020.

On November 19, 2020 Monica Hardin and Nicole Hetzel, of the Florida Department of Environmental Protection (DEP or Department), conducted an unannounced compliance evaluation inspection to determine compliance with State and Federal regulations applicable to registered UW, HW, and UO transporters. The inspection was facilitated by Michael Moore.

The facility was last inspected (at its previous location) in August 2018 with minor out of compliance issues noted, specifically related to failure to update registration and one used oil container stored without secondary containment. The two cited violations were subsequently resolved through informal enforcement via a compliance assistance offer.

The facility is a small building with offices and a fenced area in the rear with a pole barn structure and open area for parking vehicles and equipment.

While onsite inspectors wore the following personal protective equipment: face mask coverings (due to Covid-19) and safety boots.

Process Description:

USES primarily transports wastes for companies like Ascend Performance Materials and ExxonMobil; the

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wastes are generally transported on the job sites' contiguous property, with wastes remaining on the same site as it was generated on. However, some contracts do require offsite transport. Approximately one time per month, used oil is transported from Exxon to Aaron Oil; Mr. Moore explained that an appointment is required at Aaron Oil. This location is not a transfer facility; no hazardous waste or used oil is stored in trucks onsite. When waste is transported off of a job site, it is scheduled and taken directly to the permitted facility.

In the building we observed the current transporter registration prominently displayed. We also requested to review transporter receipts and training records. No discrepancies were noted in the review of the provided documents.

The rear of the building and back lot is surrounded by chain link fence with a large covered area. Underneath the covered area, we observed a 250-gallon tank labeled for used oil within secondary containment (photo 1). Occasional work on trucks or equipment is conducted in this area, however, most repairs are conducted offsite. It was explained that no batteries or used oil filters are stored onsite; if a vehicle or equipment needs a new one, the old is taken out, taken to an auto parts retail shop, where a new one is purchased and the old is left for recycling. USES must ensure that all used oil and used oil filters are disposed with a registered collection facility.

PHOTO ATTACHMENTS:

Photo 1: Used Oil Tank Labeled within Secondary Containment



Conclusion:

At the close of this inspection, United States Environmental Services LLC appears to be in compliance with applicable state and federal regulations.

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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) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> 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)			✓

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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 recalculation (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) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> 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)			✓

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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

Monica Hardin**Principal Investigator Name**Inspector**Principal Investigator Title**M.E.A.**Principal Investigator Signature**DEP**Organization**01/07/2021**Date**Nicole Hetzel**Inspector Name**Environmental Specialist**Inspector Title**DEP**Organization**Michael Moore**Representative Name**USES**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:**Russell G Sullivan**Inspection Approval Date:**01/08/2021