FLORIDA DEPARTMENT OF
Environmental Protection

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Lt. Governor

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Secretary

January 11, 2021

Greg Sullivan, District Manager
Waste Management Inc of Florida
125 Toppino Industrial Drive
Key West, FL 33045
Email: gsulliva@wm.com

Re: In-Compliance Letter
Waste Management Inc. of Florida
Facility ID Number: FLR000232157
Monroe County

Dear Mr. Sullivan:

Department personnel conducted a compliance inspection of the above-referenced facility on December 22, 2020. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy 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 Vincent Shanberg at (305) 289-7071, or via e-mail at: Vincent.Shanberg@FloridaDEP.gov

Sincerely,

Gus Rios
Program Administrator
Florida Department of Environmental Protection
South District Marathon Office

Enclosures: Inspection Report

GR/KB/VJS

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Waste Management Inc of Florida

On-Site Inspection Start Date: 12/22/2020 **On-Site Inspection End Date:** 12/22/2020

ME ID#: 129536 **EPA ID#:** FLR000232157

Facility Street Address: 143 Toppino Industrial Dr, Key West, Florida 33040

Contact Mailing Address: 25505 Old Landfill Rd, Punta Gorda, Florida 33980-3401

County Name: Monroe **Contact Phone:** (954) 557-0581

NOTIFIED AS:

Non-Handler

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste **Used Oil:** Used Oil, 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: Vincent J Shanberg, Inspector

Other Participants: Brian Cumbie, Environmental Specialist III; Greg Sullivan, District Manager

LATITUDE / LONGITUDE: Lat 24° 33' 44.1648" / Long 81° 46' 11.7984"

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted by the Florida Department of Environmental Protection (FDEP) hazardous waste inspectors at the Waste Management Inc. of Florida (WMIF) facility in Key West on 12-22-2020. The last inspection was conducted on 4-29-2019 under a different facility ID: FLR000195594. The facility changed offices in May 2019, this will be the first inspection under facility ID: FLR000232157. FDEP Inspectors Vincent Shanberg and Brian Cumbie were met by Greg Sullivan, District Manager. All inspectors and representatives were present during the inspection.

This inspection included a review of the facility's hazardous waste transporting documentation, transporter of universal waste lamps and device disposal documentation, and fleet maintenance shop documentation. During the last inspection, the fleet maintenance shop was determined to be a non-handler of hazardous waste. The facility receives water via Florida Keys Aqueduct Authority (FKAA) and is connected to the county waste system.

Process Description:

WMIF serves as a fleet maintenance shop, hazardous waste transporter, and transporter of universal waste and devices. This inspection was conducted at the fleet maintenance shop. The facility generates used oil, used oil filters, spent aerosol cans, used shop rags, and spent part washer solvent.

HAZARDOUS WASTE TRANSPORTER (HWT) :

The facility is registered as a transporter of Universal Waste Lamps and Devices through 12-10-2021 and as a Hazardous Waste Transporter (HWT) through 11-20-2021.

The facility's recycling of universal waste lamps is done using a program called LampTracker. The facility boxes the universal waste lamps in special boxes provided by the program and ships them via mail when the package is full. The facility had two boxes on-site that looked to be in good condition and labeled. The last waste shipment was made on 12-8-2020. The facility provided receipts for review.

Hazardous waste transportation is only done once a month through a household hazardous waste (HHW) collection event for the City of Key West. The event is held the first Saturday of each month at the city-owned Indigenous Park in Key West. The last collection event occurred on 12-5-2020. During the collection day, the process described by Mr. Sullivan is as follows: each resident is required to complete a form with name, address, and a list of the waste. The forms since the last inspection were available for review. The contents for each collection must be identified before WMIF can accept it. Facility staff organizes the waste by type before transportation. After the collection event of the HHW, it is then transported to the County Household Collection center at the Cudjoe Key Waste Transfer station. Spent fluorescent lamps are accepted and managed through LampTracker. No HHW is accepted from businesses. Those businesses looking to dispose of hazardous waste or spent fluorescent lights are directed by WMIF staff to either the HHW collection center in Cudjoe Key or referred to the LampTracker recycling program.

HHW is exempt from manifest requirements. The receipts for disposal at Cudjoe Key HHW collection center were maintained and available for review. Electronics are collected and transported to Long Key Transfer station for recycling. Receipts were available for review.

Training of the TREEO course "Understanding Hazardous Waste Regulations in Solid Waste Operations" was completed by: Frederick Nassor, Jean Caricus, Vitiel Cenat, Edwin Cruz, Matt Dyer, Eddy Godoy, and Odom Rozzie.

Insurance from Ace American Insurance company was current, expiring January 1st, 2021.

FLEET MAINTENANCE SHOP:

Mr. Sullivan escorted FDEP inspectors through the fleet maintenance shop. He was able to answer any questions and made receipts available for review. The facility was maintained and clean at the time of the inspection.

WASTE STREAMS:

USED OIL: Facility stores used oil in a double-walled 500-gallon steel tank located outside the maintenance shop. The condition and labeling of the tank complied with state and federal regulations. Safety-Kleen transports the used oil that has been collected. Disposal manifests were reviewed and no issues noted. There were three rolling catch carts observed empty, and one was labeled used coolant. The other two were labeled used oil. The airlift transfer machine is used to transfer used oil from a container into the used oil tank. The device was labeled used oil.

USED OIL FILTERS: Facility stores used oil filters in three 55-gallon drums located inside the shop. The three drums were in good condition and labeled. The used oil filters collected are transported by Safety-Kleen. Disposal manifests were reviewed and no issues noted.

SPENT PARTS WASHER SOLVENT: Facility leases a 30-gallon parts washer from Safety-Kleen, which uses Premium 150 Solvent. Mr. Sullivan indicated they do not use aerosol products containing regulated solvents to contaminate the spent solvent. Disposal manifest reflect spent solvent is routinely collected by Safety-Kleen every eight weeks as non-regulated waste.

SPENT AEROSOL CANS: Facility stores aerosol cans in a cabinet located within the maintenance shop. No spent aerosol cans were observed outside the cabinet. Mr. Sullivan stated that they replenish the aerosol cans or dispose of them at the HHW collection center.

USED SHOP RAGS: Facility stores used rags in a metal container labeled "oily waste can." The rags are collected through Aramark and laundered weekly.

PHOTO ATTACHMENTS:

Fleet maintenance shop



Conclusion:

The facility was well maintained at the time of the inspection. No violations were observed

5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)	✓		
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)	✓		
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A

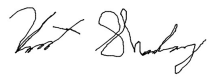
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)	✓		
5.29	contain the released oi62-710.850(5)(b)	✓		
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)	✓		
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4	✓		
Item No.	Used Oil Mixtures	Yes	No	N/A
	☐ Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	☐ Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	☐ Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			✓

	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24			✓
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			✓
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A
	☐ Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40			

	CFR 279 Subpart H.]			
	☐ Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

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

Vincent J Shanberg	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	01/11/2021
Principal Investigator Signature	**Organization**	**Date**

Brian Cumbie	Environmental Specialist III
Inspector Name	**Inspector Title**
	FDEP
	Organization

Greg Sullivan	District Manager
Representative Name	**Representative Title**
	Waste Management Inc.
	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: Gustavo Rios **Inspection Approval Date:** 01/11/2021