

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name:TG Oil Services IncOn-Site Inspection Start Date:03/17/2021On-Site Inspection End Date:03/17/2021ME ID#:124783EPA ID#:FLR000222836Facility Street Address:7815 W 2nd Ct Unit 7, Hialeah, Florida 33014-4317Contact Mailing Address:7815 W 2nd Ct Bay 7, Hialeah, Florida 33014County Name:Miami-DadeContact Phone: (954) 874-0930

NOTIFIED AS: Non-Handler, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Used Oil:** Used Oil, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector:Justin Stark, InspectorOther Participants:Juan Carlos Touzan, President

LATITUDE / LONGITUDE: Lat 25° 53' 38.364" / Long 80° 17' 16.764"

NAIC: 562998 - All Other Miscellaneous Waste Management Services

TYPE OF OWNERSHIP: Private

Introduction:

On March 17, 2021, Justin Stark with the Florida Department of Environmental Protection ("FDEP") conducted a Compliance Evaluation Inspection ("CEI") at TG Oil Services Inc (hereinafter "TG" or "facility"), located at 7815 W 2nd Ct Unit 7, Hialeah, Florida 33014. TG 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.").

Notification History:

TG initially notified the Department as a used oil transporter on 05/12/2017. This notification assigned the EPA ID FLR000222836. The facility most recently notified on 2/18/2021 as a used oil transporter/transfer facility and used oil filter transporter/transfer facility. This used oil transporter registration is valid until 06/30/2022.

Inspection History:

The facility was previously inspected by the Department on 8/15/2019 as a used oil transporter and was found to be out of compliance at the time of inspection for failure provide the following: Notification to the Department used oil transporter and used oil transfer facility, Rebuttable Presumption, Spill Prevention, Control and Countermeasures Plan (SPCC Plan), Record Keeping, Secondary Containment for stored used oil, and Employee Training Records. The violations were resolved with formal enforcement action (OGC# 19-1867).

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:

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TG is registered as a transporter for Used Oil (UO), Used Oil Filters (UOF). It mainly services elevator companies by draining oily water, repairing and impermeabilizing the elevator pits. Also, it sells oil to hydraulic elevators. Additionally, TG transports UO from small auto shops.

The facility consistent of three areas. Two warehouses and an administrative office.

No hazardous waste or used oil was observed in the administrative office.

Warehouse one:

Warehouse one is located to the left of the administrative office and is used to store one vacuum truck with the capacity of 2,400 gallons and UO, UOF, oily water and oil.

The following was observed:

> One 55-gallon poly drums of UO, labeled, closed, with secondary containment (Photo #1).

> Spill kits

> Fire extinguishers

Warehouse two:

Warehouse one is located to the right of the administrative office and is used to store equipment and tools such as: waterproof paints, seal foam chemical and concrete mixer. No hazardous waste or used oil was observed.

Record Review

Due to the person in charge of records not onsite during the inspection and CDC guidelines for COVID-19. Records were requested via email.

>Acceptance and Delivery Records - PCW, oily water and UO are taken to Raider Environmental Services (EPA ID: FLR000143891) and World Petroleum Corps (EPA ID:FLR980709075), both are registered with the FDEP as permitted used oil processor, hazardous waste, UO, and UOF transporter.

Based off 5 non-hazardous waste manifests, oily sludge is occasionally transported from the elevators they repair. Process Knowledge was used on oily sludge to determine if its non-hazardous or hazardous waste. Since TG fully services elevators (Replaces and drains oil, repairs, etc) they are the co-generator of any waste generated from these process. TG shall ensure any sludge not generated from the elevator repairs (other clients) undergo a waste determine by the generator in order to ensure hazardous waste is not transported.

>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.

>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).

>Proof of Liability Insurance - Records of the facility's Used Oil Handler Certification of Liability Insurance forms from the last three years were available for review. TG was able to provide proof of pollution liability insurance, issued by Progressive Express Insurance Company (Policy No. 06235668, expires 06/21/2021) in the amount of \$1 million. It was confirmed that TG has not had a lapse any in any of their liability insurance policies as required by Rule 62-710.600(2)(e) F.A.C.

>Annual Report for Used Oil and Used Oil Filter Activities - Annual Report for UO/oily water for the last three years were reviewed. Based on the last submitted annual report, TG managed approximately 300,327 gallons of UO/oily water and 5,750 gallons of used oil filters.

> SPCC Plan - The facility's SPCC Plan was available for review. According to the observations of the inspector, the facility's SPCC Plan appeared to be complete and in-order.

> Fleet: Both vacuum trucks have DOT placards displayed on them and have their UO registration inside [per 40

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CFR 279.43(b)].

The facility displays a valid registration form and identification number in a prominent place of the facility [62-710.500(4), FAC].

PHOTO ATTACHMENTS:

Photo #1



Photo #2



Photo #3



Conclusion:

TG Oil Services was inspected as a used oil transporter/transfer facility and used oil filter transporter/transfer facility found to be in compliance with State and Federal regulations during the time of inspection.

Any exit interview was sent via email on 3/18/2021 requesting records. TG submitted records via regular mail on 4/1/2021

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		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	1		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	~		

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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.

Justin Stark	Environmental Specialist II			
Principal Investigator Name	Principal Investigator Title			
\otimes	FDEP	04/15/2021		
Principal Investigator Signature	Organization	Date		
Juan Carlos Touzan	President			
Representative Name	Representative Title			
	TG Oil Services 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: Alannah B Irwin

Inspection Approval Date:

04/15/2021