



Florida Department of
Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Chem Klean Corp
On-Site Inspection Start Date: 05/20/2021 **On-Site Inspection End Date:** 05/20/2021
ME ID#: 133345 **EPA ID#:** FLR000231258
Facility Street Address: 9330 NW 100th St, Medley, Florida 33178-1419
Contact Mailing Address: PO Box 821263, Pembroke Pines, Florida 33082-1263
County Name: Miami-Dade **Contact Phone:** (305) 863-7807

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

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

INSPECTION PARTICIPANTS:

Principal Inspector: Jared T Heyns, Inspector
Other Participants: Nicolas Ramos, General Manager

LATITUDE / LONGITUDE: Lat 25° 51' 47.304" / Long 80° 20' 58.524"

NAIC: 484110 - General Freight Trucking, Local

TYPE OF OWNERSHIP: Private

Introduction:

On May 20, 2021 (05/20/2021), Jared Heyns with the Florida Department of Environmental Protection (DEP) conducted a routine compliance evaluation inspection (CEI) at Chem Klean Corp (CK), located at 9330 NW 100th St in Medley. CK 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.), as well as the state used oil Rule 62-710 F.A.C.

The inspector was escorted around the facility by Nicolas Ramos, General Manager. Upon arrival at the facility the inspector presented their credentials and explained the purpose of the inspection.

CK occupies approximately 106,000 square feet and is connected to public water and sewer. CK has been operating at its current location since May 2019 and employs 7 staff. The facility office operates normal daytime hours.

Notification History:

CK initially notified with the Department as a Hazardous Waste Transporter, Used Oil Transporter, and Used Oil Filter Transporter on 03/25/2019. The facility was assigned the EPA Identification (EPAID) Number FLR000231258. CK most recently notified as a Hazardous Waste Transporter, Used Oil Transporter, Used Oil

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Filter Transporter, and Used Oil Transfer facility on 05/03/2021.

Inspection History:

The facility was previously inspected by the Department on 05/29/2019 as a Hazardous Waste and Used Oil Transporter and was found to be out of compliance at the time of inspection. The violations were pertaining to acting as an un-registered Used Oil Transfer facility and manifest issues. The facility corrected the violations and the case closure letter was issued on November 12, 2019 (11/12/2019).

Safety boots and safety glasses were the only Personal Protective Equipment (PPE) required to enter the facility. The Department inspector was also equipped with a face mask.

Process Description:

CK is a transporter for hazardous waste (HW) and used oil and a transfer facility for used oil. The facility consists of two areas: the office where administrative work is done, and the warehouse where all transport/transfer operations occur. The Department inspector toured the warehouse before conducting a record review.

The Department inspector verified that CK is not a transfer facility for HW; instead, CK transports HW directly to the next transporter or designated facility (Stericycle Specialty Waste Solutions, EPAID FL000702985) within 24 hours. The facility asked about the requirements for HW transfer facilities and on-site compliance assistance was offered pertaining to the facility potentially re-notifying as a HW transfer facility.

CKC transports used oil to its own facility where it stores its used oil. During the inspection the inspector observed:

- Thirteen 55-gallon steel drums containing used oil.
- Two 5-gallon poly buckets containing used oil.

All containers were observed to be closed, properly labeled with the words "Used Oil", and on secondary containment pallets.

During the time of inspection, no HW was observed on-site.

The facility has two box trucks that are used to transport used oil and HW. Both trucks have Department of Transportation (DOT) placards displayed on the sides of the trucks. CK keeps copies of the permits, notifications, contingency plan (in case of emergency), and manifests on the truck. Also, the trucks are properly identified for their corresponding wastes and have fire extinguishers and spill kits available.

Record Review

- Transport, receiving and shipping records were available for review at the time of inspection. The facility has maintained records since the start of operation and was advised to retain all records of transportation and training for three years. The facility was using an equivalent form to [62-710.901(2)].
- For HW activities: Manifest records were available for review at the time of the inspection. HW is transported to the transfer facility Stericycle Specialty Waste Solutions, Inc. (EPA ID FL0000702985). It is then transported by Stericycle (EPA ID MNS000110924) to its final destination Allworth, LLC (EPA ID ALD094476793) in Birmingham, Alabama. Generator EPAID numbers were included on the manifests as well as Land Disposal Restriction forms. No deficiencies were observed.
- For used oil activities: manifest records were available for review at the time of the inspection. Used oil is transported from its clients to CK where it is stored on-site for a period of less than 35 days. No deficiencies were observed.
- Insurance liability: the facility maintains an up-to-date insurance policy via Granada Insurance Company in the amount of \$1,000,000. The policy (#0110FL00039246) is current through 07/30/2021.
- Employee Training - Employees receive annual training which covers laws and regulations pertaining to HW and used oil transporters under the Florida Administrative Code and the Federal Regulations, spill avoidance and emergency response procedures, and halogen testing. A DEP approved PowerPoint presentation on used oil transportation is also used for in-house training. Last in-house training was conducted on 04/28/2021. All employees handling HW and used oil receive an 8-hour Hazwoper refresher course from USF OTI Education Center. This training includes the RCRA rules for proper transportation of HW within the state of Florida.
- Halogen Screening Procedure - The facility tests every pickup for used oil halogen contents using the Chor-D-Tect 1000, manufactured by Dexsil Corporation. If used oil is in excess of 1,000 ppm total halogens it is managed as HW.

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- An SPCC and contingency plan were available for review which included emergency contacts and procedures for reporting and notifying local, state, and Federal regulatory agencies. Last revision 02/2019.
- Closure Plan - Although not required, the facility has a closure plan and it is up-to-date.
- Used oil annual reports are submitted to the Department complete and on-time.

PHOTO ATTACHMENTS:

Front of the facility



SDS on-site



Used oil drum storage



Employee training



Conclusion:

CK was inspected as a HW transporter, used oil transporter, and used oil transfer facility and was found to be in-compliance at the time of the inspection.

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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

Jared T Heyns

Inspector

Principal Investigator Name

Principal Investigator Title



DEP

06/21/2021

Principal Investigator Signature

Organization

Date

Nicolas Ramos

General Manager

Representative Name

Representative Title

Chem Klean 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: 06/21/2021