



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

October 21, 2021

Mr. Clint Daugherty  
25207 NW 8<sup>th</sup> Lane  
Newberry, Florida 32669  
[cdaugherty@a-otc.com](mailto:cdaugherty@a-otc.com)

**Re: Alpha-Omega Training & Compliances (AOTC)**  
**EPA/DEP ID: FLR000238139**  
**Alachua County – Hazardous Waste**

Dear Mr. Daugherty:

Department personnel conducted a compliance inspection of the above-referenced facility on July 21, 2021. 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. Any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your compliance efforts. Should you have any questions or comments, please contact Cheryl Mitchell at (904) 256-1620 or via e-mail at [cheryl.l.mitchell@dep.state.fl.us](mailto:cheryl.l.mitchell@dep.state.fl.us).

Sincerely,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

Ec: Julie Pocklington, Alachua County EPD ([jpocklington@alachuacounty.us](mailto:jpocklington@alachuacounty.us))  
DEP Internal: Joni Petry, Bonnie Bradshaw, Cheryl L. Mitchell, DEP\_NED



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

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**FACILITY INFORMATION:**

**Facility Name:** Alpha-Omega Training & Compliance Inc  
**On-Site Inspection Start Date:** 07/21/2021 **On-Site Inspection End Date:** 07/21/2021  
**ME ID#:** 142721 **EPA ID#:** FLR000238139  
**Facility Street Address:** 25207 NW 8th Ln, Newberry, Florida 32669-2538  
**Contact Mailing Address:** 25207 NW 8th Ln, Newberry, Florida 32669  
**County Name:** Alachua **Contact Phone:** (352) 472-7295

**NOTIFIED AS:**

Non-Handler

**WASTE ACTIVITIES:**

**Generator:** VSQG **Transporter:** Commercial Waste **Used Oil:** Used Oil, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps **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 VSQG (<100 kg/month) Facility  
Routine Inspection for Used Oil Generator Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector  
**Other Participants:** Daniel "Clint" Daugherty, Operations Manager

**LATITUDE / LONGITUDE:** Lat 29° 39' 21.2832" / Long 82° 36' 41.76"

**NAIC:** 562910 - Remediation Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Alpha-Omega Training & Compliance (AOTC, the facility) was inspected by the Department's Hazardous Waste Program on July 21, 2021. A site visit was also conducted for the records review on September 1, 2021. AOTC has never been inspected at this location; however, its former location as 25370 NW 8th Lane (FLR000167635) was last inspected by the Department on August 10, 2017. That location ceased operations and closed in early 2021. AOTC has been in operation at its current location since April 2021. Mr. Daniel "Clint" Daugherty, AOTC Operations Manager, and Ms. Julie Pocklington, Alachua County EPD, were present throughout the inspection and the records review.

AOTC is a registered Hazardous Waste Transporter and a Very Small Quantity Generator (VSQG) of hazardous waste. AOTC primarily provides emergency response services for transportation accidents and small industrial facilities that are typically Very Small Quantity Generators of hazardous waste. No other transportation services are currently provided, but Mr. Daugherty said that AOTC wants to expand its transporter services in the near future to add used oil and universal wastes, and also operate as a transfer facility for these additional wastes and hazardous waste. AOTC has eight employees and operates Monday through Friday from 8:30 AM to 5:00 PM and is on-call 24/7 to perform emergency response services.

In April 2021 AOTC closed its former location at 25370 NW 8th Lane (FLR000167635) and began operations at its current location at 25207 NW 8th Lane. The facility consists of a main building that includes offices, three enclosed vehicle bays and an open bay that will be used as a maintenance/wash rack area (Photo 1). A second

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building at the facility is an open warehouse structure that is used for staging of hazardous wastes during transport activities performed by AOTC (Photo 2). The remainder of the property is used for storage of supplies, emergency response materials, and heavy equipment (Photo 3).

The main building is connected to city water and city sewer. AOTC operates one vacuum truck, two emergency response trailers, and various trailers for hauling heavy equipment. The facility's vehicles are currently maintained off-site by a third-party vendor but Mr. Daugherty said that AOTC plans to start performing routine maintenance of its equipment in the open bay maintenance/wash rack area in the next few months.

## Process Description:

### HAZARDOUS WASTE TRANSPORTER OPERATIONS

At the time of the inspection, AOTC had collected on-site two containers totaling 160 pounds of D002 corrosive hazardous waste from Sysco-Baugh, a VSQG, located in Alachua, and two containers totaling 105 pounds of D002 corrosive hazardous waste from a vehicle accident that involved pool cleaning chemicals (Photo 4). The containers were closed and properly labeled. All four containers had been on-site at the facility for several weeks. Mr. Daugherty explained that AOTC had been authorized by the Department to consolidate VSQG waste generated from its emergency response operations and from other facilities and as part of that authorization it was allowed additional time to manage and dispose of the VSQG waste. Further research into the VSQG consolidation authorization revealed that the Department had granted AOTC authorization for consolidation of VSQG waste beginning in 2010. However, that authorization was granted under AOTC's former EPA ID#FLR000167635 at its former location at 25370 NW 8th Lane. When AOTC moved operations in April 2021 it did not request new authorization to continue its VSQG consolidation activities under its new EPA ID#FLR000238139. AOTC failed to notify of a change to its regulated waste activities [62-730.150(2)(b), FAC].

### RECORDS REVIEW

AOTC is currently operating as a Hazardous Waste Transporter and a Very Small Quantity Generator (VSQG) of hazardous waste. Records reviewed included hazardous waste manifests, annual registration, insurance liability coverage, and personnel training. Two hazardous waste manifests did not have the AOTC Transporter ID# listed on the manifest. AOTC failed to properly prepare a manifest in accordance with the manifest instructions [40 CFR 262.20(a)]. All records reviewed appeared to be in order unless otherwise noted herein.

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Copies of Northeast District's Hazardous Waste Generator Workshop PowerPoint training documents and other workshop files that may be useful can be found here:

VSQGs use this link: <ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/SQG%20WORKSHOP/>  
and Transporters use this link: <ftp://ftp.dep.state.fl.us/pub/outgoing/NED%20-%20HazWaste/TRA%20WORKSHOP/>

Please note that you cannot access this site using Chrome so you will have to use another browser such as Edge, Firefox, Internet Explorer, etc.

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## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	262.20(a)
Explanation:	AOTC failed to correctly complete manifests in accordance with manifest instructions by not entering the Transporter EPA ID# on two hazardous waste manifests.
Corrective Action:	No further action is required. AOTC stated during the return visit on September 1, 2021, that all personnel had been provided additional training on completing manifests in accordance with the instructions.

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Type: Violation

Rule: 62-730.150(2)(b)

Explanation: When AOTC moved its operations in April 2021 it did not notify the Department of the change and request a new authorization to continue its VSQG consolidation activities.

Corrective Action: No further action is required. Immediately after the inspection AOTC ceased consolidation of all VSQG waste and on August 18, 2021, AOTC submitted its request to the Department to renew its authorization to consolidate VSQG waste.

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**PHOTO ATTACHMENTS:**

Photo 1



Photo 2



Photo 3

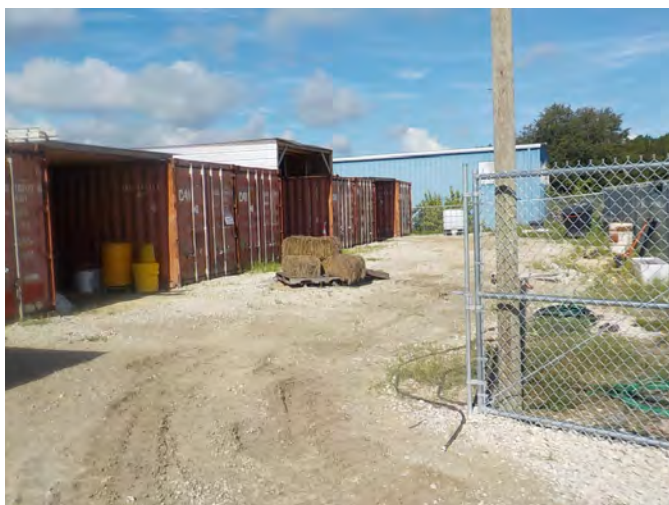


Photo 4



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**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)			✓
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
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

Cheryl L Mitchell**Principal Investigator Name****Principal Investigator Signature**Inspector**Principal Investigator Title**DEP**Organization**10/04/2021**Date**Daniel "Clint" Daugherty**Representative Name**Operations Manager**Representative Title**Alpha-Omega Training and  
Compliance**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:**Cheryl L Mitchell**Inspection Approval Date:**10/04/2021