



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

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**FACILITY INFORMATION:**

**Facility Name:** NRC Gulf Environmental Services Inc  
**On-Site Inspection Start Date:** 12/09/2021 **On-Site Inspection End Date:** 12/09/2021  
**ME ID#:** 58751 **EPA ID#:** FLD099077257  
**Facility Street Address:** 6900 NW 12th Ave, Fort Lauderdale, Florida 33309-1103  
**Contact Mailing Address:** 901 McClosky Blvd, Tampa, Florida 33605-6717  
**County Name:** Broward **Contact Phone:** (813) 241-0282

**NOTIFIED AS:**

Transporter, Used Oil, VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG **Transporter:** Own Waste, 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 Hazardous Waste Transporter Facility  
Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Universal Waste Transporter Facility  
Routine Inspection for VSQG (<100 kg/month) Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Justin Stark, Inspector  
**Other Participants:** Tarin Tischler, Environmental Specialist II; Shawn Mckenzie, Branch Manager

**LATITUDE / LONGITUDE:** Lat 26° 12' 36.2618" / Long 80° 9' 35.1617"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On December 9, 2021, Justin Stark with the Florida Department of Environmental Protection ("FDEP") conducted a Compliance Evaluation Inspection ("CEI") at NRC Gulf Environmental Services Inc (hereinafter "NRC" or "facility"), located at 6900 NW 12th Ave, Fort Lauderdale, Florida 33309. NRC 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."). The inspector was accompanied by Tarin Tischler from the FDEP.

The inspector was escorted around the facility by Shawn Mckenzie. Upon arrival at the facility, the inspector presented their credentials and explained the purpose of the inspection.

NRC acquired the former SWS Environmental Services operation in October 2018; however, this facility became operational over ten years ago.

NRC is approximately 58,942 square feet in size and is connected to municipal water and sewer. NRC has been operating at this location for the last 10 years and currently employs 10 staff.

**Notification History**

NRC initially notified with the FDEP as a Small Quantity Generator ("SQG") on 12/8/1989. The facility was

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assigned the EPA Identification ("EPA ID") Number FLD099077257. NRC recently notified as a hazardous waste, used oil, used oil filters, and universal waste transporter on 3/17/2021. The registration is valid until 6/30/2022.

### Inspection History:

The facility was inspected by the FDEP on 08/15/2019 and found to be out of compliance for not ensuring that manifests were filled out in accordance with 40 CFR 263.20. The facility returned to compliance on 8/27/2019 and the case was closed without formal enforcement.

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:

NRC is primarily an emergency response company; however, on rare occasions the scheduled transport of hazardous waste (HW) and universal waste (UW) is conducted. Operations include transport of used oil, used oil filters, petroleum-contact water, hazardous waste, and mercury lamps and devices.

The facility consists of a front office, warehouse, and a fenced-in vehicle storage yard with a fleet composed of 15 vehicles. No fleet maintenance operations are conducted on-site, and the facility currently does not generate or store HW for greater than 24 hours.

### Front Office:

Administrative work is done here and no hazardous waste was observed during the inspection.

### Warehouse:

This area is primarily used for various storage of clean-up tools, empty drums, and vehicles. In this area, Department inspectors observed: two (2) pick-up trucks that were parked ready for deployment to a clean-up operation, an emergency evacuation map posted, several fire extinguishers, an eye/face wash station, and several two-way radios. No HW was observed in this area.

### Vehicle Storage Yard:

This area is fenced-in and under controlled access at all times. At the time of the inspection, Department inspectors observed 4 vehicles in this area: 2 vacuum trucks, and 2 combo trucks. All vehicles were empty of any contents and no HW was observed in this area. 6 rollover dumpsters were observed, two of which contained non-hazardous soil, both rollovers were closed and protected from the elements.

### Record Review:

#### Manifest records:

Receiving and shipping records were available for review at the time of the inspection. NRC is an emergency response spill contractor for: private citizens (estate chemical clean-outs), local businesses, and various government entities including, but not limited to, U.S. Drug Enforcement Agency (DEA), U.S. Army, U.S. Air Force, U.S. Navy, U.S. Marines, U.S. Coast Guard, DEP, Department of Defense, and Department of Energy. Department inspectors viewed a large selection of manifest records from 2019, 2020, and 2021.

Stericycle Specialty Waste Solutions, Inc. (EPA ID FL0000702985) is utilized as a secondary transporter for most of NRC's jobs to transport to its final destination at Allworth, LLC (EPAID ALD094476793), located at 500 Medco Road, Birmingham, AL, 36217. All manifests provided by NRC showed that the transporter held the wastes less than 24 hours. Based on the manifest review, it was confirmed that NRC does not operate as a HW Transfer facility.

During the records review, the following manifests missing the signed copies were observed:

- Manifest # 010535821JJK
- Manifest # 010535824JJK
- Manifest # 010535639JJK
- Manifest # 010535672JJK

### Liability Insurance:

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The facility provided the Department a Certificate of Liability Insurance certified by Zurich American Insurance Company (Policy Number BAP4525418-00) and supports the use of provision 62-730.170(2)(a) F.A.C. for automobile liability, that includes pollution prevention liability, in the amount of \$2,000,000, expiration date 05/01/2022.

### Employee Training:

NRC uses an online training system by Cornerstone for an initial training of all new employees, and monthly or annual refreshers (depending on the course) for each employee thereafter. This training meets all applicable requirements of 40 CFR 262.17(a)(7). Department inspectors viewed 2019, 2020, and 2021 training records at the time of the inspection.

### Spill Prevention, Control, and Countermeasure (SPCC) Plan:

The facility provided a SPCC plan and an Emergency Action plan for Used Oil and HW which contained the emergency coordinator, emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures. The plan was last revised on 07/08/2019, and all information is up-to-date. Each vehicle in the facility's fleet has a binder that contains the SPCC plan and all insurance information.

### Hazardous Waste Transporter Certificate:

NRC maintains a copy of the approval, issued by DEP, to transport hazardous waste - expiration date 06/30/2022.

### Annual Vehicle Report:

NRC provides regular annual vehicle inspection reports, which certify that the vehicles used to transport HW pass all the inspection items in accordance with 49 CFR Part 396.

## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	<b>263.20(d)(2)</b>
Explanation:	Per 40 CFR 263.20(d)(2), adopted and incorporated by reference in Rule 62-730.170(1) F.A.C., A transporter who delivers a hazardous waste to another transporter or to the designated facility must retain one copy of the manifest in accordance with 40 CFR 263.22. During the inspection, the following manifests missing the final signed copies were observed: <ul style="list-style-type: none"> <li>- Manifest # 010535821JJK</li> <li>- Manifest # 010535824JJK</li> <li>- Manifest # 010535639JJK</li> <li>- Manifest # 010535672JJK</li> </ul>
Corrective Action:	Violation corrected on 12/13/2021. The facility submitted the final signed copies via email. The facility shall ensure that it keeps all final copies onsite for at least three years and for the Departments review. <p>Although this is a repeat violation from the 08/15/2019 inspection, the FDEP will not pursue enforcement. Three of the manifests observed were from 2019 but before FDEP inspection on 8/15/2019, the fourth was from 8/20/2019. No other violations pertaining to a final sign copy were not observed after 8/20/2019.</p>

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## PHOTO ATTACHMENTS:

# NRC Gulf Environmental Services Inc Inspection Report

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Picture#1



Picture#2



Picture#3



## Conclusion:

NRC was inspected as an hazardous waste, used oil, used oil filters, and universal waste transporter and found to be out of compliance with state and Federal regulations for failure to maintain the final signed copies for 4 manifests onsite.

An exit interview was sent on 12/10/2021 requesting corrective actions for the observed non-compliance issues. The facility submitted its corrective actions on 12/13/2021. The facility has since returned to compliance.

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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

Justin StarkEnvironmental Specialist II**Principal Investigator Name****Principal Investigator Title**FDEP01/12/2022**Principal Investigator Signature****Organization****Date**Tarin TischlerEnvironmental Specialist II**Inspector Name****Inspector Title**FDEP**Organization**Shawn MckenzieBranch Manager**Representative Name****Representative Title**US Ecology**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:**01/12/2022