



# 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

May 4, 2022

Ms. Alyssa Cardona  
ELS Abatement & Construction, Inc.  
1754 Aston Hall Drive East  
Jacksonville, FL 32246  
[alyssa@elslabor.com](mailto:alyssa@elslabor.com)

Re: **ELS Abatement & Construction, Inc.**  
**EPA/DEP ID: FLR000246561**  
**Duval County – Hazardous Waste**

Dear Ms. Cardona:

Department personnel conducted a compliance inspection of the above-referenced facility on April 5, 2022. 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 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@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov).

Sincerely,

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

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

cc: Julian Cardona, ELS Abatement & Construction ([jcardona@elslabor.com](mailto:jcardona@elslabor.com))  
DEP internal: Joni Petry, Bonnie Bradshaw, Cheryl Mitchell



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

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**FACILITY INFORMATION:**

**Facility Name:** ELS Abatement & Construction Inc  
**On-Site Inspection Start Date:** 04/05/2022 **On-Site Inspection End Date:** 04/05/2022  
**ME ID#:** 146325 **EPA ID#:** FLR000246561  
**Facility Street Address:** 1408 Saint Johns Bluff Rd N , Jacksonville, Florida 32225-8342  
**Contact Mailing Address:** 1754 Aston Hall Dr E, Jacksonville, Florida 32246  
**County Name:** Duval **Contact Phone:** (904) 226-1429

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Used Oil:** Transporter, Oil Filters

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Hazardous Waste Transporter Facility  
Routine Inspection for Non-Handler Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector  
**Other Participants:** Alyssa Cardona, Co-owner

**LATITUDE / LONGITUDE:** Lat 30° 20' 41.3232" / Long 81° 31' 26.0616"

**NAIC:** 562910 - Remediation Services

**TYPE OF OWNERSHIP:** Private

**Introduction:**

ELS Abatement & Construction, Inc. (ELS, the facility) was inspected on April 5, 2022. ELS notified the Department in April 2021 as a Hazardous Waste Transporter, Used Oil (UO) and Used Oil Filter (UOF) Transporter, a Petroleum Contact Water (PCW) Transporter, and a Non-Handler of hazardous waste (NHR). ELS has not previously been inspected by the Department's Hazardous Waste Program. Ms. Alyssa Cardona, ELS Co-Owner, was present throughout the inspection.

ELS primarily provides asbestos and lead abatement contract services for renovation and demolition projects. ELS has been at this location for approximately five years. Ms. Cardona stated that ELS added emergency spill response operations to its services last year. As an emergency spill response contractor, ELS would respond to petroleum releases and spills, perform cleanup of the petroleum-impacted areas, and transport any used oil and PCW waste to one of the used oil and PCW processing facilities in Jacksonville, Water Recovery, Inc. (FLR000069062) or Liquid Environmental Solutions (FLD981928484), for disposal as appropriate. Any solid wastes generated during response activities would have a waste determination made and be disposed at a facility that was authorized to accept the specific type of petroleum-impacted wastes.

ELS currently has approximately 15 employees and operates Monday through Friday, 8:00 AM to 5:00 PM and on weekends as needed for emergency response operations. The facility is connected to city water and sewer. The facility consists of an office space and two storage sheds that are used for materials and supplies (Photo 1). A portable trailer that contains spill response supplies is also located on the property.

**Process Description:**

At the time of the current inspection, Ms. Cardona stated that the facility had not transported any hazardous

## ELS Abatement & Construction Inc Inspection Report

Inspection Date: 04/05/2022

waste, used oil, used oil filters, or PCW. ELS does not plan to transport hazardous waste but registered as a hazardous waste transporter because it anticipates transporting PCW as part of its spill response services.

The facility is reminded that, because it is a registered transporter and not a registered transfer facility, the following restrictions and regulations apply to its operations:

- 1) used oil should not remain on-site for more than 24-hours, 62-710, Florida Administrative Code (FAC), and 40 CFR 279.40-44 apply;
- 2) used oil filters should be stored in sealed containers that are located on an oil-impermeable surface, and should not remain on-site for more than 10 days, 62-710.850, FAC, applies; and
- 3) PCW should not remain on-site for more than 35 days, 62-740, FAC, applies.
- 4) If any hazardous wastes are transported, the facility should comply with 62-730.170, FAC, and 40 CFR 263.

### RECORDS REVIEW

ELS is currently operating as a Non-Handler of hazardous waste and is registered as a Transporter of Hazardous Waste, Used Oil, Used Oil Filters, and Petroleum Contact Water (PCW). Because ELS has not transported any hazardous waste, used oil, used oil filters or PCW, there were no shipping documents or logs to review. Other records reviewed included annual registration, insurance liability coverage, and personnel training. All records reviewed appeared to be in order.

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Copies of Northeast District's PowerPoint training documents that may be useful can be found here:  
<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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### PHOTO ATTACHMENTS:

Photo 1



Inspection Date: 04/05/2022

**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			✓

Inspection Date: 04/05/2022

**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

Inspector

**Principal Investigator Name**

**Principal Investigator Title**



DEP

04/27/2022

**Principal Investigator Signature**

**Organization**

**Date**

Alyssa Cardona

Co-owner

**Representative Name**

**Representative Title**

ELS Abatement & Construction

**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:** 04/27/2022