



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

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**FACILITY INFORMATION:**

**Facility Name:** Associated Waste Services  
**On-Site Inspection Start Date:** 08/10/2022      **On-Site Inspection End Date:** 08/10/2022  
**ME ID#:** 137077      **EPA ID#:** FLR000233403  
**Facility Street Address:** 8282 NW 56th St , Doral, Florida 33166-4018  
**Contact Mailing Address:** 18201 NW 86th Ave, Hialeah, Florida 33015-2524  
**County Name:** Miami-Dade      **Contact Phone:** (305) 592-9574

**NOTIFIED AS:**

Transporter, Used Oil, VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec, 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 Used Oil Transfer Facility Facility  
Routine Inspection for Universal Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Michele C DeFreitas, Inspector  
Tarin Tischler, Environmental Specialist II; Johanna Polycart, Environmental Specialist II;  
**Other Participants:** Larry Rodriguez, President

**LATITUDE / LONGITUDE:** Lat 25° 49' 26.436" / Long 80° 19' 53.6484"

**NAIC:** 484110 - General Freight Trucking, Local

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On August 10th, 2022 (08/10/2022), Michele De Freitas with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Evaluation Inspection at Associated Waste Services (hereinafter AWS or facility), located at 8282 NW 56th St Doral, Florida, 33166. AWS was inspected to determine the facility's compliance with State and Federal Hazardous Waste Regulations described in Title 40 Code of Federal Regulations (CFR) Parts 260-268, and 279 adopted and incorporated by reference in Rule 62-710, and 62-730 Florida Administrative Code (F.A.C.). The inspector was accompanied by Tarin Tischler, Environmental Specialist II and Johanna Polycart, Environmental Specialist II with FDEP.

The inspectors were escorted around the facility by Larry Rodriguez, President of AWS. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

AWS began operations at this location since January 2020. The facility occupies approximately 1000 square feet and is connected to municipal water and sewer and employs approximately 4 employees. The facility operates Monday to Friday from 7AM to 5PM.

**Notification History:**

Associated Waste Services originally notified with the Department as Very Small Quantity Generator (VSQG) of hazardous waste and Used Oil Transporter on 11/13/2019. The facility was assigned an EPA Identification

## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

(EPAID) Number FLR000233403. The facility most recently re-notified with the Department via submittal of 8700-12FL form on 03/31/2022 and an Annual Report and Certificate of Liability Insurance on 03/11/2022. The facility is registered as a Very Small Quantity Generator of Hazardous Waste, Transporter of Universal Waste, Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter, Used Oil filter Transfer Facility, and Used Oil Fuel Marketer.

### Inspection History:

The facility was last inspected by the Department on 02/19/2020 and was in compliance with State and Federal Regulations.

Steel-toed boots and masks were the only Personal Protective Equipment (PPE) required to enter the facility.

### Process Description:

AWS operates as a hazardous waste, used oil, used oil filter, universal waste transporter, and used oil and used oil filter transfer facility. They are also registered as a Used Oil Marketer but does not conduct any used oil marketing activities.

AWS transports used oil and used oil filters from customers across Broward and Miami-Dade Counties. The facility began operations in January 2020 at this location. They are not a Hazardous Waste Transfer Facility although they are registered as one, they do not practice any Hazardous Waste Transfer activities due to Miami citing requirements. They provide a cradle-to-grave service where they pick up the customers' waste and take it directly to Triumvirate Environmental.

Mr. Larry Rodriguez provided a detailed description of their services and indicated that they cater to small companies that the bigger transporters aren't able to reach on time for their waste pick up. They primarily pick up waste from auto body shops which includes used oil, used oil filters, and paint-related waste and they also pick up sandblast media from aviation facilities and waste rags. He also stated that oily water, non-hazardous industrial wastewater, explosives, reactives, or poisons are not picked up by AWS but instead subcontracted out to a third-party company eligible to pick up and transport these types of hazardous wastes.

AWS occupies a bay and office area in a commercial lot. AWS owns one (1) box truck and one (1) tank truck that recently commenced oil pickups that go directly to Triumvirate. They do not have a vacuum truck but instead use Heritage-Crystal Clean for any vacuum jobs.

He also stated that Triumvirate takes the oily wastes, non-hazardous and hazardous wastes in drums but now AWS delivers the used oil in the tanker truck directly to Triumvirate after pick-up. They do have a permit for the tanker truck.

The facility uses Clor-D-Tect Halogen test kits, and these were seen in the office area, along with flammable, oxidizer, non-hazardous and hazardous labels.

### Office Area:

This area is where all admin services and customer relations are conducted. It consists of a lobby/ waiting area and a back-office area fitted with a small kitchenette. Immediately to the east of this area is the bay/loading area. There is a door that connects the office area to the bay.

No hazardous waste was observed in this area.

### Bay/Loading Area:

This area is located to the east of the office area. It is primarily used to store empty drums, products used in processes and for clients and drums that contained used oil, used oil filters and absorbent pads and rags that were brought back to the facility from pick-ups that were not able to be dropped off due to time constraints at Triumvirate. Mr. Rodriguez indicated that these wastes usually go for disposal the next day. Mr. Rodriguez pointed out that the waste usually stays on the truck with the paperwork to be delivered the next day unless there is an influx of drums some will be stored in the Bay area until the truck finishes a route and is ready to take the waste to Triumvirate to be disposed of. However, manifests/orders are scanned and sent to Triumvirate to inform them that there will be a truck coming with waste to be disposed of and when.

He also indicated that Used Oil Filters are not drained and crushed but instead placed into the drums, labeled

## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

and taken to Triumvirate to be disposed of.

This area within the Bay would be the CAA for these drums until they are disposed of.

There were also spill kits and fire extinguishers observed in this area. There are also lockers available for employee use and tool storage.

### CAA:

At the time of the inspections, inspectors observed the following:

- One spill containment pallet containing one (1) 55-gallon drum of acetone which was indicated to be product and one (1) 55-gallon drum of Flash Solvent also indicated to be product.
- One spill containment pallet containing one (1) 55-gallon drum labeled "Non-Hazardous Waste NON-DOT/NON RCRA Regulated Waste (SOLID)" and one (1) 55-gallon drum labeled "Non-Hazardous Waste – Absorbents & Oil" with an accumulation start date of 07/01/2022.
- Eight (8) 55-gallon drums that were labeled used oil filters and used oil respectively, at the time of the inspection.
- One pallet containing client's product.

Inspectors requested to see records for the eight (8) 55-gallon drums located in the CAA in the Bay area as well as records for the two (2) 55-gallon drums of non-hazardous waste, observed in the Bay area as well.

The facility also generates Universal Waste Lamps.

### Records Review:

#### Certificates:

The facility had its Hazardous Waste Transporter Certificate up to date and displayed on the wall in the lobby/office area. The expiration on this certificate is 06/30/2023.

The facility had its Used Oil Transporter, Transfer Facility, Marketer, Filter Transporter and Filter Transfer Facility Certificate up to date and displayed on the wall in the lobby/office area. The expiration on this certificate is 06/30/2023.

The facility had its Universal Waste Lamps and Devices Transporter Certificate up to date and displayed on the wall in the lobby/office area. The expiration on this certificate is 03/01/2023.

#### Training:

The facility conducts annual training for its employees directly involved in coming in contact with hazardous materials and hazardous wastes. The facility has one driver, Mr. Feliberto Lopez and he has been trained for OSHA 24-hour HAZWOPER Training, which was most recently completed on 04/13/2022. Mr. Rodriguez is also HAZWOPER Trained for 8 hours which was most recently completed on 04/27/2022. Mr. Anthony Rodriguez is another employee of AWS who also has been HAZWOPER Trained for 8 hours and his training was most recently completed on 05/17/2021.

On 08/23/2022, Mr. Rodriguez submitted documentation for DOT Hazmat Basic General Awareness Training for Mr. Sebastian Mendez who completed this training on 08/22/2022, Mr. Larry Rodriguez who completed this training on 04/28/2022, and Mr. Feliberto Lopez who completed this training on 08/19/2022. He also submitted documentation DOT Hazmat Function Specific Training for Shipping Papers for Mr. Sebastian Mendez who completed this training on 08/22/2022 and Mr. Anthony Rodriguez who completed this training on 08/22/2022.

#### Liability Insurance:

The facility provided the inspectors during the inspection a copy of their Certificate of Liability Insurance. It is issued and certified by Gorin Insurance Inc. Their coverages include Commercial General Liability and Professional Liability (Policy Number: EPK-139653) which expires on 05/08/2023 and Automobile Liability which includes a Combined Single Limit per accident in the amount of \$1,00,000 (Policy Number: 02596318) which expires on 02/16/2023. This supports the use of provision 62-730.170(2)(a) F.A.C.

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

During the inspection, inspectors reviewed the Oil Spill Contingency Plan onsite which included all emergency contacts for AWS, local emergency responders, cleanup contractors, and neighboring property owners. On

## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

08/23/2022, Mr. Rodriguez submitted documentation of the full Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) to the department which is certified by Mr. Enrique Saez who is a certified professional engineer. This plan details all emergency contacts, emergency coordinator, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures. All contact information was up to date for this new location.

### Manifests & Rebuttable Presumption:

Manifest records are maintained onsite and were readily available for review. AWS collects hazardous waste from mainly very small quantity generators and some small quantity generators of Hazardous Waste in Broward and Miami-Dade counties. They mainly cover places like aviation facilities and auto shops. They do not service any junkyards or refrigeration facilities.

When AWS picks up the waste they take it to a secondary transporter, Triumvirate Environmental (EPAID: FLD981018773) which then disposes of it at their designated facility located at 10100 Rocket Blvd Orlando, Florida, 32824 that is registered under a different EPA ID: FLD980559728. AWS does not store hazardous waste on-site, rather it is usually taken directly to Triumvirate for disposal unless in extreme situations where Triumvirate is closed after AWS drivers complete their daily route, the waste is then taken back to the facility, but it stays on the truck with the paperwork to be disposed of the next day.

The facility previously used Stericycle as its secondary transporter in 2019.

The facility also had readily available Non-Hazardous Waste Manifests for review. They also had attached their own Non-Hazardous Waste Manifest for internal tracking and documentation. However, the halogen testing when conducted on the pick-ups of used oil and oily water was not documented on the manifests. It was not noted if it was done through Generator Knowledge or Halogen Testing, as per 40 CFR 279.44 – Rebuttable presumption for Used Oil. Inspectors provided compliance assistance onsite during the inspection and in the exit interview dated 08/16/2022, to have AWS start documenting the method of testing and if the halogen content passed or failed in order to be transported.

On 02/23/2022, Mr. Rodriguez submitted corrected documentation of their internal Non-Hazardous Waste Manifest being updated to reflect a section to document the Halogen Testing and whether the sample passed or failed. He also sent a photo of the sniffer kit they use to test the halogen content of their pick-ups.

The most recent Non-hazardous waste manifest also had corrected information to show the halogen content of the sample which was picked up on 08/18/2022. This was documented under Waste Tracking Number 233403-0236 and the waste was taken to Triumvirate Environmental designated facility located at 3570 SW 74th Ave Davie, Florida, 33314 which is registered under EPA ID FLD981018773, for disposal.

All manifests reviewed and submitted show that AWS holds hazardous waste for less than 24 hours.

### Annual Report for Used Oil and Used Oil Filter Activities:

On 03/11/2022, the facility submitted their most recent Annual Report for Used Oil and Used Oil Filter Activities and it showed that a total of 46,730 gallons of used oil and oily wastes were managed in Florida and 17,500 used oil filters were managed in Florida. Waste oily water was sent for disposal at Raider Environmental.

## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	279.44(d)
Explanation:	The facility failed to document the total halogen content of the used oil being transported or stored at a transfer facility us above or below 1,000 ppm.
Corrective Action:	On 08/23/2022, the facility submitted documentation to show an updated Waste Manifest that now documents the total halogen content of the used oil conducted via the halogen sniffer test.

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## PHOTO ATTACHMENTS:



# Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

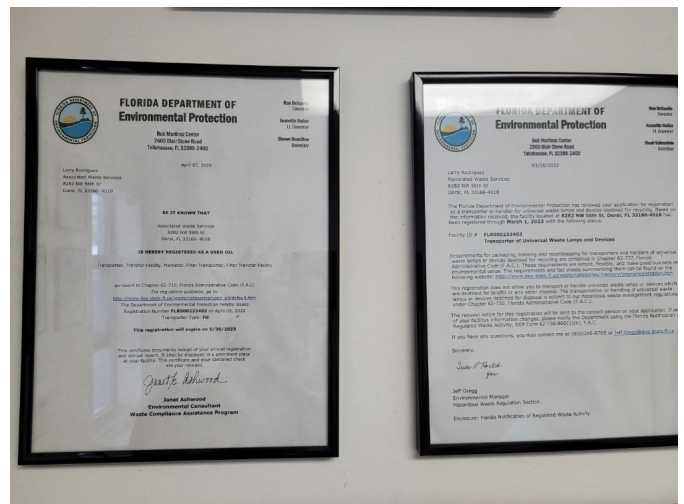
## Front of the Facility



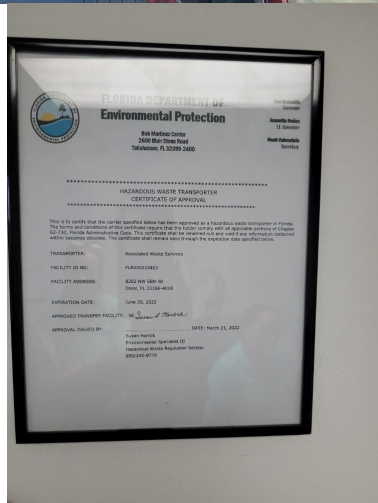
## Displayed Licensing



## Used Oil Transporter Registration and UW Transporter Registration



## Certificate of Approval



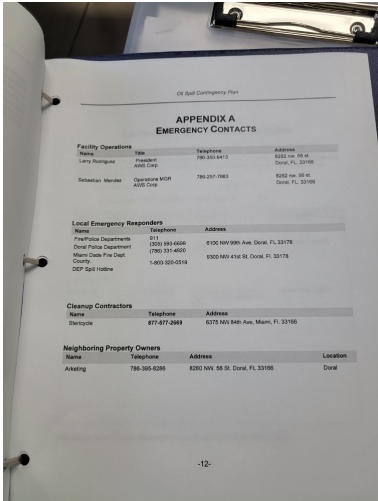
## Training 1



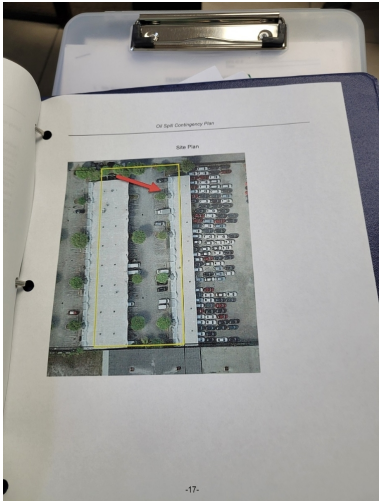
## Training 2



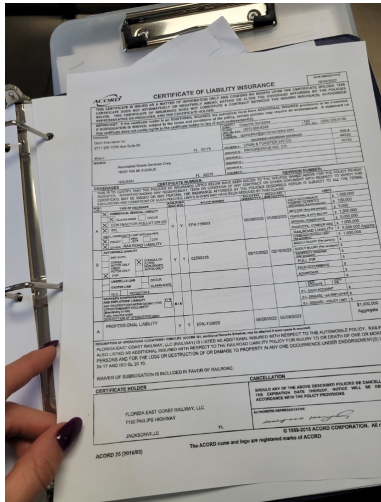
Inspection Date: 08/10/2022



Emergency Contacts  
Certificate of Liability Insurance



Site Plan



Bay/Loading Area



CAA



Drums of Product



# Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

One of the Non-Haz Manifest 08/09/2022 missing

**ASSOCIATED WASTE SERVICES**  
8282 NW 58th St  
Miami, FL 33155

**Non-Hazardous Manifest**

Manifest No. 070000022  
Order Date  
Pickup Date  
Customer ID

Generator Site Address: 8282 NW 58th St, Miami, FL 33155  
Generator Manifest No. 070000022  
Generator EPA ID: 17861432-2203  
Associated Waste Services: 8282 NW 58th St, Miami, FL 33155  
Destination Facility: 8282 NW 58th St, Miami, FL 33155  
Facility Phone: (786) 431-2203  
Facility EPA ID: 17861432-2203

Waste Shipment Details:

Waste Shipment Name and Description	Qty	Type	Quantity	Unit
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal
Non DOT Non RCRA Regulated Waste (Used Oil)	1	Drum	55	Gal

Generator Signature: [Signature]  
Transporter Signature: [Signature]  
Date: 8/10/2022

Halogen Content  
Box Truck



Sniffer Test 2



Tanker Truck for Used Oil



Sniffer Test 1



Truck Spill Kit

## Conclusion:

AWS was inspected as a hazardous waste, used oil, used oil filter and universal waste transporter, and used oil and used oil filter transfer facility and was found to be out of compliance for failure to document the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000ppm (40 CFR 279.44 – Rebuttable presumption for Used Oil). However, on 08/23/2022, the facility representative submitted documentation to show an updated waste manifest that documents the halogen content being done via halogen

## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

sniffer testing. The facility has since returned to compliance.



## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

**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)			✓

## Associated Waste Services Inspection Report

Inspection Date: 08/10/2022

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)			✓

Inspection Date: 08/10/2022

**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

Michele C DeFreitas**Principal Investigator Name****Principal Investigator Signature**Environmental Specialist II**Principal Investigator Title**FDEP**Organization**09/06/2022**Date**Tarin Tischler**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Johanna Polycart**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Larry Rodriguez**Representative Name**President**Representative Title**Associated Waste Services**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:**09/06/2022