



Jack Long, Director  
Southeast District Office

# Florida Department of Environmental Protection

Southeast District Office  
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Charlie Crist  
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Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

**July 7, 2009**

**VIA ELECTRONIC MAIL: [jlennon@perma-fix.com](mailto:jlennon@perma-fix.com)**

John Lennon, Site Manager  
Perma-Fix of Fort Lauderdale  
3670 SW 47<sup>th</sup> Ave.  
Davie, FL 33314

Broward County  
HW – Perma-Fix of Fort  
Lauderdale

Re: Hazardous Waste Compliance Inspection of Perma-Fix of Fort Lauderdale, 3670 SW 47<sup>th</sup> Ave.,  
Davie, FL 33314.

Dear Ms. Lennon:

On June 23, 2009, the Department conducted a hazardous waste compliance inspection at your facility. At the time of the inspection, your facility appeared to be a Conditionally Exempted Small Quantity Generator (CESQG) of hazardous waste. The inspection also found possible violations of Chapter 403, Florida Statutes (F.S.), and Chapter 62-730 Florida Administrative Code (F.A.C.) regarding the management of hazardous waste. Florida Statutes provide that facilities must comply with Title 40 Code of Federal Regulations (CFR) Parts 260 to 268 as adopted in Chapter 62-730, F.A.C.

On June 29, 2009, the Department received a compliance submittal showing the requested updates had been made to the facility's contingency plan. It appears that your facility has returned to compliance. Please refer to the attached report which documents the inspection of your facility.

This will conclude the Department's investigation into this matter; however, please be advised that the state will continue to conduct random and unannounced compliance evaluation inspections in the future. If you have any questions about the inspection or any other compliance related issues, please contact Kathy Winston at 561/681-6756. Thank you for your cooperation.

Sincerely,

Karen Kantor  
Environmental Manager  
Hazardous Waste Compliance/Enforcement Section

Attachments: Hazardous Waste Inspection Report

Cc: Electronic Archboard/OCULUS  
Al Gomez, EPD, [AGOMEZ@broward.org](mailto:AGOMEZ@broward.org)  
[vsanagustin@perma-fix.com](mailto:vsanagustin@perma-fix.com)



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

Draft

**FACILITY INFORMATION:**

**Facility Name:** Perma Fix of Ft Lauderdale Inc  
**On-Site Inspection Start Date:** 06/22/2009      **On-Site Inspection End Date:** 06/22/2009  
**ME ID#:** 50649      **EPA ID#:** FLD981018773  
**Facility Street Address:** 3670 SW 47th Ave #109, Davie, Florida 33314  
**Contact Mailing Address:** 3701 SW 47th Ave #109, Davie, Florida 33314-2830  
**County Name:** Broward      **Contact Phone:** (954) 583-3795

**NOTIFIED AS:**

CESQG (<100 kg/month)  
Transporter  
Transfer Facility  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter facility  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Hazardous Waste Transfer Facility  
Routine Inspection for Used Oil Transfer Facility  
Routine Inspection for Used Oil Marketer facility  
Routine Inspection for Used Oil Processor facility  
Routine Inspection for Universal Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kathy R Winston, Inspector  
Other Participants: John Lennon, Site Manager; Jeremy Vincent, Environmental Specialist

**LATITUDE / LONGITUDE:** Lat 26° 4' 37.8283" / Long 80° 12' 33.5153"

**SIC CODE:** 9511 - Public admin. - air, water, and solid waste management

**TYPE OF OWNERSHIP:** Private

**Introduction:**

PermaFix of Ft. Lauderdale (PFFL) is a permitted facility authorized to process used oil, oily wastewater, petroleum contact water, oily solid waste, and used oil filters. PFFL is a hazardous waste transporter and transfer station. The facility is situated on a 2.5 acre site in light industrial area, and is served by city water and sewer. PFFL has operated from this site for 13 years and employs 25 people. The participants in the inspection were Department personnel Kathy Winston and Jeremy Vincent, and PFFL site manager, John (Shawn) Lennon.

Inspection History - The Department is required to inspect PFFL at least every two years. Inspections were conducted in 2007 and before that in 2006. In each case, few, if any, items were requested and the facility was brought back into compliance without enforcement.

**Process Description:**

Used oil and oily wastewater are received in the tank farm area located in the southeast portion of the site.

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Used oil is offloaded into two 20,000-gallon aboveground tanks. The used oil is filtered, and then allowed to sit for further oil/water separation. The processed oil is tested for compliance with "on-specification" standards, and is sold as fuel oil to PFFL customers. The oily wastewater is transferred for storage in one of seven tanks. The oily water is filtered, and then transferred to a boiler tank where it is heated to 150 ° F for oil/water separation. An emulsifier is added to facilitate further oil/water separation and the temperature is raised to 200 ° F, then the process is shut down. The water readily separates from the oil, and the oil is diverted to a holding tank.

Used oil filters are not consolidated but sent in generator containers to US Foundry in Medley, Florida. Oily solid wastes are consolidated into a rolloff container for disposal to Central Landfill in Pompano Beach, Florida.

### New Potential Violations and Areas of Concern:

#### Checklist Independent Potential Violations and Areas of Concern

Type: Violation  
 Rule: 279.52(b)(2)(iv)  
 Explanation: Contingency Plan must included home address of primary and secondary emergency coordinator.  
 Corrective Action: Please revise in Contingency Plan and send revised pages to Department and local authorities.

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Type: Area Of Concern  
 Rule: 62-737.400(5)(b)1.  
 Explanation: Please make sure that once waste lamps arrive at your facility that they are checked for proper labeling.  
 Corrective Action: Please properly label mercury containg lamps when receive from customers.

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Type: Violation  
 Rule: 279.52(b)(2)(iii)  
 Explanation: Need to amend Contingency Plan to include State Warning Point on list of numbers to be called in case of spill.  
 Corrective Action: Please revise Contingency Plan to include State Warning Point on appropriate page and supply revised page to Department and local authorities.

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### Summary of Potential Violations and Areas of Concern:

#### Potential Violations

Rule Number	Area	Date Cited	Explanation
279.52(b)(2)(iv)	Checklist Independent Violations	06/22/2009	Contingency Plan must included home address of primary and secondary emergency coordinator.
279.52(b)(2)(iii)		06/22/2009	Need to amend Contingency Plan to include State Warning Point on list of numbers to be called in case of spill.

Areas of Concern

<b>Rule Number</b>	<b>Area</b>	<b>Date Cited</b>	<b>Explanation</b>
Checklist Independent Areas of Concern 62-737.400(5)(b)1.		06/22/2009	Please make sure that once waste lamps arrive at your facility that they are checked for proper labeling.

**Conclusion:**

Based on the inspection, FCC appears to generate less than 100 kg of hazardous waste per month which would classify them as a Conditionally Exempted Small Quantity Generator (CESQG), however, as a permitted facility PFFL has obligations beyond their generation status. An exit interview was conducted at the conclusion of the inspection which addressed the potential violations listed above.

The facility was found to be out of compliance at the time of the inspection. The facility was given 14 days to return to compliance.


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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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R Winston	Inspector
<b>PRINCIPAL INSPECTOR NAME</b>	<b>PRINCIPAL INSPECTOR TITLE</b>
	
<b>PRINCIPAL INSPECTOR SIGNATURE</b>	<u>6/22/2009</u>
	<b>DATE</b>

Jeremy Vincent	Environmental Specialist
<b>INSPECTOR NAME</b>	<b>INSPECTOR TITLE</b>

NO SIGNATURE	FDEP
<b>INSPECTOR SIGNATURE</b>	<b>ORGANIZATION</b>

John Lennon	Site Manager
<b>REPRESENTATIVE NAME</b>	<b>REPRESENTATIVE TITLE</b>
	PermaFix of Ft. Lauderdale
<b>REPRESENTATIVE SIGNATURE</b>	<u>6/23/2009</u>
	<b>DATE</b>

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.