



*Inspector*

# Department of Environmental Protection

Lawton Chiles  
Governor

Northeast District  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590

Virginia B. Wetherell  
Secretary

July 8, 1997

Mr. Ken Graden  
Independent Waste Oil, Inc.  
343 B Denard Ave.  
Jacksonville, Florida 32254

Dear Mr. Graden:

Independent Waste Oil, Inc.  
DEP/EPA ID FLR00000 9563  
Duval County- Hazardous Waste Used Oil

Thank you for your assistance during the hazardous waste RCRA Compliance Assistance Visit conducted by the Department at your facility on April 30, 1997. Enclosed is a copy of the checklist which documents this visit.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulations in general, please call me at (904) 448-4320, ext. 380.

Sincerely,

Pamela Fellabaum  
Environmental Specialist  
Hazardous Waste Section

*PF*  
PF:aw

Enclosure



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## USED OIL INSPECTION REPORT

1. INSPECTION TYPE: ☒ Compliance Assistance ☐ Complaint ☐ Follow-Up ☐ Permitting

FACILITY NAME: Independent Waste Oil DEP/EPA ID #: FLR00000 9563

STREET ADDRESS: 343 B Denard Street, Jacksonville, FL 32254

COUNTY: Duval PHONE: (904) 781-8903 DATE: 4/30/97 TIME: 9:15 a.m.

### HW facility status

- ☒ non-handler
- ☐ CESQG
- ☐ SQG
- ☐ LQG
- ☐ transporter
- ☐ transfer facility
- ☐ TSD
- ☐ SQH
- ☐ LQH

### used oil facility status

- ☐ generator
- ☒ transporter
- ☒ transfer facility
- ☐ marketer
- ☐ processor
- ☐ on-spec. burner
- ☐ off-spec. burner
- ☐ filter generator
- ☒ filter transporter
- ☒ filter transfer facility
- ☒ filter processor

### Hg facility status

- ☐ exempt
- ☐ generator
- ☐ transporter
- ☐ Hg recovery facility
- ☐ Hg reclamation facility

### PCW facility status

- ☐ producer
- ☐ transporter
- ☐ recovery facility

## 2. APPLICABLE REGULATIONS:

- |  |                                      |                                      |                                      |
|--|--------------------------------------|--------------------------------------|--------------------------------------|
| <input type="checkbox"/> 40 CFR 261.5          | <input type="checkbox"/> 40 CFR 262  | <input type="checkbox"/> 40 CFR 263  | <input type="checkbox"/> 40 CFR 264  |
| <input type="checkbox"/> 40 CFR 265            | <input type="checkbox"/> 40 CFR 266  | <input type="checkbox"/> 40 CFR 268  | <input type="checkbox"/> 40 CFR 273  |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL: Mr. Ken Graden

4. INSPECTION PARTICIPANTS: Mr. Graden, IWO  
Pamela Fellabaum, FDEP  
Rich Neves, FDEP

5. TYPE OF OWNERSHIP: private federal state county municipal

6. PERMIT #: ISSUE DATE: EXP. DATE:

## USED OIL TRANSPORTER CHECKLIST

Facility Name: Independent Waste Oil Date: 4/30/97  
Facility Representative: Ken Graden Facility ID #: \_\_\_\_\_  
Inspector: P. Fellabaum Registration # FLR 000009563

### 40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? (279.40(a)) Y \_\_\_\_\_ N X

On site transport?

Generator transporting < 55 g /time to a collection center?

Transporter of < 55 g /time from generator to aggregation point owned by same generator ?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous)

*facility* Can not accept antifreeze unless TCLP non-haz available \* N

3. Does the transporter process used oil incidental to transport? (279.41)

Y \_\_\_\_\_ N X

Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?

*Need TCLP on Sludges generated* Y \_\_\_\_\_ N X

If not, has the transporter conducted a hazardous waste determination? (279.10(e))

- oily water gallons do not balance out.* N/A Y \_\_\_\_\_ N \_\_\_\_\_

4. Has the facility notified of used oil activities? Check EPA form 8700-12

Y X N \_\_\_\_\_

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a))

Y X N \_\_\_\_\_

6. Does the transporter comply with DOT requirements? (279.43(b))

Y X N \_\_\_\_\_

7. If any oil is discharged during transport, does the transporter: (279.43(c))

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Report to DOT in writing per 49 CFR 171.16?

Clean up any discharges until the discharge poses no threat?

*will*  
Y \_\_\_\_\_ N \_\_\_\_\_  
Y \_\_\_\_\_ N \_\_\_\_\_  
Y \_\_\_\_\_ N \_\_\_\_\_

8. Does the facility also transport used oil filters?

Y X N \_\_\_\_\_

If so, are the filters stored in above ground containers which are: (62-710.850(6))

In good condition?

Closed or otherwise protected from weather?

Labeled "Used Oil Filters"?

Stored on an oil impervious surface?

Y X N \_\_\_\_\_  
Y X N X - roll-off  
Y \_\_\_\_\_ N X - roll-off  
Y \_\_\_\_\_ N X some drums

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

### Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y X N     

EPA ID # of oil provider (if applicable)?

Y      N X

Quantity of oil shipped?

Y X N     

Date of shipment?

Y X N     

Signature of oil provider, dated upon receipt?

Y X N     

*Paperwork  
could be  
organized  
better*

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y X N     

EPA ID # of receiving facility or transporter?

Y X N     

Quantity of oil delivered?

Y X N     

Date of delivery?

Y X N     

Signature of oil receiver, dated upon receipt?

Y X N     

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))

Y X N     

4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y X N     

5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y X N     

If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y      N     

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y      N      *will*

### Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)

Y X N     

2. Does the facility maintain training records? (62-710.600(2)(c))

Y      N      *need personnel training*

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))

Y X N     

4. Is the facility registration form and ID number displayed? (62-710.500)

Y X N

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

Transfer Facility Standards - 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F

N/A \_\_\_\_\_ Y X N \_\_\_\_\_

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?

Y \_\_\_\_\_ N X

2. Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?

Y \_\_\_\_\_ N X

Is this done by testing?

need to obtain halogen detectors of Y \_\_\_\_\_ N \_\_\_\_\_

Is this done by process knowledge? Describe basis in narrative. use consistently

Y \_\_\_\_\_ N \_\_\_\_\_

Are test records or copies of records providing basis for determination kept for 3 years?

Y \_\_\_\_\_ N \_\_\_\_\_

3. Have any analyses showed exceedances of the 1,000 ppm level? Do Not Know

Y \_\_\_\_\_ N \_\_\_\_\_

If so, was the oil managed as hazardous waste?

Y \_\_\_\_\_ N \_\_\_\_\_

If not, was the oil exempt? Describe in narrative.

N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_

4. Is used oil stored only in tanks or containers? (Circle applicable units)

Y X N \_\_\_\_\_

5. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Y \_\_\_\_\_ N \_\_\_\_\_

Is secondary containment provided and adequate?

need 2° cont. for all containers Y \_\_\_\_\_ N X

6. Are containers, and tank trailers in good condition and not leaking? on tanks

Y X N \_\_\_\_\_

7. Are containers provided with secondary containment consisting of walls and floor at a minimum?

Y \_\_\_\_\_ N X

Is the containment system impervious to oil so as to prevent migration? will need

Y \_\_\_\_\_ N \_\_\_\_\_

8. Are ASTs, UST tank fill lines and containers labeled "used oil?"

Y X N X - not all

9. Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A \_\_\_\_\_ Y X N \_\_\_\_\_

10. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? need to clean a few areas

Y \_\_\_\_\_ N \_\_\_\_\_

oily water → IPS

oil → Sellers

oil filters → us Foundry

Oil Dry → Trail Ridge

Antifreeze → mixed w/ H<sub>2</sub>O































