



# Department of Environmental Protection

Jeb Bush  
Governor

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

David B. Struhs  
Secretary

Barry Hamilton, Field Supervisor  
Advanced Environmental Services (AETS)  
4317-L Fortune Place  
West Melbourne, Florida 32904

OCD-HW/P-99-0329

Brevard County - HW  
Advanced Environmental Services  
Inspection

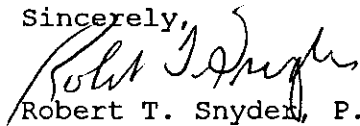
Dear Mr. Hamilton:

A hazardous waste compliance inspection was conducted at your facilities on September 24, 1999. This inspection was conducted under the authority of section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facilities with 40 CFR 260-268, adopted in Florida Administrative Code Chapter 62-730.

Advanced Environmental Services (AETS) was inspected as a hazardous waste transfer facility. The facility was found to be in compliance at the time of inspection. Please be aware that AETS must continue to comply with all applicable hazardous waste rules and regulations.

Please do not hesitate to contact Chris Aoussat (407) 893-3323 if you have any questions.

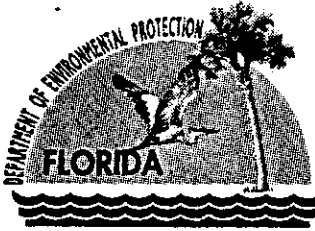
Sincerely,

  
Robert T. Snyder, P.E.  
Program Manager  
Hazardous Waste

Date: 10/11/99

RTS/ca

cc: Satish Kastury, FDEP  
Kent Williams, EPA Region IV



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## HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE:  Routine  Complaint  Follow-Up  Permitting  Pre-Arranged

FACILITY NAME Advanced Environmental Technical Services (AETS) EPA ID # FLD984262790

STREET ADDRESS 4317-L Fortune Place, West Melbourne, Florida 32904

MAILING ADDRESS 4317-L Fortune Place, West Melbourne, Florida 32904

COUNTY Brevard PHONE 407/722-2455 DATE 09/24/99 TIME 0900

NOTIFIED AS:  N/A

CURRENT STATUS:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

2. APPLICABLE REGULATIONS:

- |                                       |                                      |   |                                      |
|---------------------------------------|--------------------------------------|---|--------------------------------------|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262  | <input checked="" 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 type="checkbox"/> 40 CFR 279   | <input type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input type="checkbox"/> 62-737, FAC |

3. RESPONSIBLE OFFICIAL(s):

Barry Hamilton, Field Supervisor

4. INSPECTION PARTICIPANTS:

Chris Aoussat, FDEP

Barry Hamilton, AETS

5. LATITUDE/LONGITUDE: 27°48'20" / 80°29'40"

6. NAICS Code: 562112

7. TYPE OF OWNERSHIP:  Private  Federal  State  County  Municipal

8. PERMIT #: N/A ISSUE DATE: N/A EXP. DATE: N/A

**9. INTRODUCTION:**

On September 24, 1999 Chris Aoussat, FDEP accompanied by Barry Hamilton (Field Supervisor) of Advanced Environmental Technical Services (AETS), inspected the transfer facility for compliance with hazardous waste regulations.

AETS located at 4317-L Fortune Place, West Melbourne, Brevard County, Florida, is a transfer facility which stores hazardous waste. The facility is approximately 11,500 sq. ft. in area, and is served by the City of West Melbourne for its water and sewage. AETS currently employs a field supervisor and three drivers. The facility has been operating as a transfer facility since March of 1994. AETS was issued an EPA identification number of FLD984262790.

**10. INSPECTION HISTORY:**

October 25, 1994 – Facility not in compliance – training, contingency plan and weekly inspections were inadequate.

**11. PROCESS DESCRIPTION:**

AETS travels throughout the state to pick up hazardous waste. The waste is then taken to another transporter or brought back to the transfer facility. According to the dates and signatures reviewed on the manifests, some of the hazardous waste materials are stored longer than 24 hours, and all the hazardous wastes appeared to be managed within the 10 day required time limit for a transfer facility. Hazardous waste stored at the facility is unloaded from the smaller AETS vehicles into a large trailer, which is parked adjacent to the loading bay. The containers are at no time opened or stored in the warehouse.

**12. INSPECTION:**

A routine inspection was conducted at the facility on September 24, 1999, by the Department. Chris Aoussat (FDEP) was accompanied by Barry Hamilton, Field Supervisor for AETS, during the inspection.

AETS operates under the EPA identification number of FLD984262790 as a hazardous waste transfer facility that is permitted to store waste for more than 24 hours but less than 10 days. The facility is served by the City of West Melbourne for its water and sewage. AETS currently employs a field supervisor and three drivers. The facility has been operating as a transfer facility since March of 1994. AETS is a registered hazardous waste transporter operating under the EPA identification number NJD991291584.

AETS travels throughout the state utilizing 22 foot, enclosed box vans which have a 13,000 pound capacity for the transportation of hazardous waste. The hazardous waste is transported in 55-gallon containers and is either taken to another transporter or brought back to the transfer

facility awaiting shipment. Currently all the hazardous waste is stored in an enclosed, secured, trailer that is parked adjacent to the warehouse on a manmade service. There were eighteen containers of hazardous waste in the trailer at the time of this inspection. All containers inspected were sealed, in good condition, and properly marked and labeled. There were also nineteen, 55-gallon drums of used oil filters stored inside the facility destined for recycling. No hazardous waste was found stored inside the facility.

A joint venture agreement between Chemical Waste Management/AETS and Vivendi Hazardous Business Unit, closed on June 30, 1999. The AETS company name and logo will soon be replaced by "Onyx Environmental Services". The facility has access to five TSD's and numerous transfer locations. Hazardous waste incineration is conducted at the Port Arthur and Sauget facilities formerly known as Chemical Waste Management sites. Fuel blending and recycle/recovery services are conducted at four facilities – Azusa, California, Henderson, Colorado, West Carrollton, Ohio, and Morrow, Georgia.

#### Record Review

The inventory logs were inspected for the past year and found to be in order. Weekly inspections were verified. Daily inspection logs dating from 1/1/99 through 9/24/99 were in order. Each vehicle was inspected for the required "Hazardous Waste Transporter Approval Certification," which was current and expires January of 2000. Contingency Plan was updated on 2/3/98 and the Closure Plan was reviewed. Training for the emergency coordinators Barry Hamilton and James Cullipher was current and was obtained on 1/29/99. Certificate of Liability Insurance was current and expires 1/01/2000. Manifests were reviewed for the past year, for Bell South, Harris Information Systems and Northrup Grumman, and were found to be in compliance.

#### Land Ban

All appropriate land ban certifications were found attached to the manifests and no violations were noted.

#### Recommendations

During inspection of the hazardous waste containers, it was noted that AETS was completing the "Date Accumulated" section of the hazardous waste label. This is a generator requirement and not a transporter requirement. If the generator does not supply the date of accumulation, then that part of the label should be left blank. It is not the responsibility of the transporter to supply this date since the transporter has no knowledge of the accumulation start date. AETS may want to inform the facility of the generator requirements of 40 CFR 262.34 regarding accumulation time.

13. **CONCLUSION:**

Following the inspection, an exit interview was conducted with Barry Hamilton. No violations were noted and the facility was found to be in compliance at the time of this inspection.

Report Prepared By: Chris Aoussat  
Chris Aoussat  
Hazardous Waste Section

  
RTS/ca