



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

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**FACILITY INFORMATION:**

**Facility Name:** United States Environmental Services LLC  
**On-Site Inspection Start Date:** 08/02/2018      **On-Site Inspection End Date:** 08/02/2018  
**ME ID#:** 36036      **EPA ID#:** FLD984255570  
**Facility Street Address:** 4040 Ashland Ave, Pensacola, FL 32534-1050  
**Contact Mailing Address:** 3750 Halls Mill Road, Mobile, AL 36693  
**County Name:** Escambia      **Contact Phone:** (251) 662-3500

**NOTIFIED AS:**

Non-Handler  
Transporter  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Transporter facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Paige L Plier, Inspector  
**Other Participants:** Nicole Hetzel, Inspector; Michael Moore, Interim Assistant Director

**LATITUDE / LONGITUDE:** Lat 30° 32' 12.3519" / Long 87° 17' 40.1182"

**SIC CODE:** 4789 - Trans. & utilities - transportation services, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

U.S. Environmental Services (USES) is located in Escambia County, Florida, and transporter hazardous waste, used oil, and mercury-containing materials. This facility, located at 4040 Ashland Ave, Pensacola, FL 32534, has never been inspected for compliance with the State's transporter regulations. USES is on-call to respond to transport requests 24 hours per day, seven days a week. They currently work with eight drivers who are trained to operate a fleet consisting of four air movers and five liquid-vacuum vehicles. At this location are administrative offices, a repair shop, materials storage, and parking for vehicles, trailers, and other equipment such as generators and emergency response units. USES's corporate office is located in Mobile, AL.

**Process Description:**

I conducted a routine unannounced inspection of USES on August 2, 2018 to document the facility's compliance with the State and Federal transporter regulations. We were received by the Interim Assistant Director, Mr. Michael Moore. He explained that USES recently lost several administrative employees, including the previous Environmental Health & Safety manager who normally handles the information required during this type of inspection. I assured Mr. Moore we would assist him as much as possible during this inspection and offer compliance assistance to prepare them for future inspections of this type.

USES is a non-handler of hazardous waste and does not operate as a transfer facility, meaning that no materials are stored or handled on-site. Mr. Moore explained that USES primarily transports wastes for companies like Ascend Performance Materials, ExxonMobile, Cerex Advanced Fabrics, Inc., and Armstrong World Industries, Inc. He stated that wastes are usually transported on contiguous property and remain on the site it originated from. For example, sludges or used oil/oily water would be transported to a storage container or tank onsite prior to disposal. Companies that transport to a disposal facility are Aaron Oil Company, Inc., and LNS Transport Service, Inc. USES vehicles will remain at the location/business it normally services unless maintenance is required. Minor repairs and maintenance occurs at the Pensacola office.

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Visual Inspection:

We inspected the repair garage and noted small batteries stored inside, used oil and product oil/fuel containers. Universal waste batteries were being managed in a way to prevent releases prior to core exchanges/recycling. There were two 55-gallon drums labeled as "Used Oil Filters" that were closed and in good condition. One 55-gallon drum labeled as "Used Oil" was not in secondary containment. Mr. Moore stated he would address this potential violation as soon as possible.

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Records Review:

In the facility's office, transporter receipts were reviewed with no violations noted. When I inquired about USES's transporter liability insurance and training records, Mr. Moore stated that these items were electronically on file but due to the recent loss of employees and changes in management they were not able to retrieve these items while we were onsite. He stated he would follow-up with me immediately after the inspection with these requested items. Mr. Sean Allen, from the USES corporate office in Mobile, provided training logs for their drivers and a copy of their liability insurance policy to the Department via email on August 2, 2018. USES is insured through July 1, 2019.

I observed that a copy of USES's transporter registration was not displayed in a prominent location within their administrative building. Upon a review of this facility's public records, I discovered their transporter registration expired January 1, 2018. On August 15, 2018, I provided an 8700-12FL Form to Mr. Moore to renew their transporter registration. I recommend they submit the form as soon as possible and halt operations until a valid transporter registration is issued.

**New Potential Violations and Areas of Concern:****Violations**

Type:	Violation
Rule:	263.11(a)
Question Number:	6.1
Question:	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)
Explanation:	Upon a review of the facility's records, I discovered their transporter registration expired on January 1, 2018.
Corrective Action:	On August 15, 2018, I provided an 8700-12FL Form to Mr. Moore and Mr. Allen to renew their transporter registration. Complete the registration as soon as possible and post the valid registration onsite when it is issued. Please share all return to compliance efforts with the Department.

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Type:	Violation
Rule:	62-710.401(6)
Explanation:	One 55-gallon used oil drum was not within secondary containment.
Corrective Action:	Mr. Moore provided photo documentation of this violation corrected on August 9, 2018. A new used oil container was placed into a secondary containment unit (Photo 1).

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**PHOTO ATTACHMENTS:**

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Photo 1 - RTC Used Oil Secondary Containment



**Conclusion:**

According to the information provided while onsite and immediately following the inspection, the facility does not appear to be in compliance with State and Federal transporter regulations.

Mr. Moore followed-up with the Department immediately following the inspection on August 9, 2018, with return-to-compliance efforts in regards to the used oil deficiency I observed while onsite. He provided photo documentation of a new used oil storage unit with secondary containment (Photo 1). It appears the Chapter 62-710.401(6) violation has been corrected.

According to email correspondence on August 15, 2018, the facility is in the process of renewing their transporter registration.

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**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)			✓
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)			✓

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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)			✓

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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.

Paige L Plier  
Principal Inspector Name

Inspector  
Principal Inspector Title

  
Principal Inspector Signature

DEP  
Organization

08/16/2018  
Date

Nicole Hetzel  
Inspector Name

Inspector  
Inspector Title

DEP  
Organization

Michael Moore  
Representative Name

Interim Assistant Director  
Representative Title

USES  
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: Russell G Sullivan

Inspection Approval Date: 08/21/2018