



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

January 24, 2013

SENT VIA EMAIL
iwosuzi@yahoo.com

Mr. Ken Graden, Owner
Independent Waste Oil, Inc.
343 Dennard Avenue
Jacksonville, Florida 32254

Re: Independent Waste Oil, Inc.
EPA/DEP ID: FLR 000 009 563
Duval County – Hazardous Waste

Dear Mr. Graden:

Thank you for your assistance during the hazardous waste compliance inspection conducted by the Florida Department of Environmental Protection (Department) at your facility on November 20, 2012. Enclosed is the report that documents this inspection.

Potential violations of Florida Statutes and Rules concerning used oil management were discovered during this inspection. Your facility corrected the potential violations, so the inspection will be closed without enforcement action being taken by the Department.

Your continued cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulations in general, please contact me at 904.256.1671.

Sincerely,

Jabe Breland III
Environmental Specialist III
Hazardous Waste Section
Enclosure(s)



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

FACILITY INFORMATION:

Facility Name: Independent Waste Oil Inc

On-Site Inspection Start Date: 11/20/2012

On-Site Inspection End Date: 11/20/2012

ME ID#: 59611

EPA ID#: FLR000009563

Facility Street Address: 343 Dennard Ave # B, Jacksonville, Florida 32254-3401

Contact Mailing Address: 343 Dennard Ave, Jacksonville, Florida 32254-3401

County Name: Duval

Contact Phone: (904) 781-8903

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Ken Graden, Owner

LATITUDE / LONGITUDE: Lat 30° 19' 10.0643" / Long 81° 45' 58.2762"

SIC CODE: 4214 - Trans. & utilities - local trucking with storage

TYPE OF OWNERSHIP: Private

Introduction:

Independent Waste Oil, Inc. (IWO) was inspected by the Department's hazardous waste section on November 20, 2012, as an unannounced hazardous waste compliance inspection. The facility is currently operating as a used oil transporter/transfer facility and a used oil filter transporter/transfer facility. The facility also transports antifreeze, oil-contaminated solids and oily wastewater.

The facility consists of an office, a tank farm, a tool house, an empty drum house, and storage trailers. The facility has been assigned the EPA ID number FLR000009563. Please use this number on future correspondence with the Department's hazardous waste section. Mr. Ken Graden, Owner, participated in the inspection. The facility has four employees and is on septic.

Process Description:

Tank Farm

IWO services facilities that are located in several counties in Northeast Florida. When IWO picks up the used oil, the driver screens it for halogens with a Dexcel Q-4000 testing unit. If the used oil appears to contain halogens, based upon the test kit, IWO does not pick-up the used oil.

IWO transports all of the wastes that it picks-up from its customers to its Jacksonville facility. The IWO property has two 18,500-gallon aboveground storage tanks (ASTs) for used oil, one 6,000-gallon AST for non-hazardous oily wastewater, one 6,000-gallon AST for spent antifreeze, and one 8,200-gallon tanker trailer for additional non-hazardous wastewater. All four of the ASTs and the tanker trailer were properly labeled. The facility operates a pumping station that has a dedicated line connected to each tank. Adjacent to the pump station was one 55-gallon drum that collects

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used oil dry from spills around the pump station.

All of the storage tanks are located within concrete secondary containment that will contain 110% of the volume of the largest tank. Water collected in the secondary containment is collected and disposed of with the non-hazardous oily wastewater. Used oil is transported at least once a week to TexPar (GAD033590514). The non-hazardous oily wastewater is shipped to Liquid Environmental Solutions (LES) as needed.

Spent antifreeze is stored in the dedicated 6000-gallon AST. Spent antifreeze is recycled by Safeway.

Tool House

The Tool House is a small building, located within a bermed area that is used to store the facility's tools and equipment. At the time of the inspection, no waste was being generated or stored in this area.

Empty Drum House

This small building, also located within a bermed area, is adjacent to the Tool House and is used to store empty 55-gallon drums.

Used oil filters are stored outside of the Empty Drum House on a concrete pad. Used oil filters are no longer processed on-site by crushing and the crushers have been drained of oil and will be sold. Used oil filters are collected in 55-gallon drums and are placed into a roll-off for transport. The roll-off is taken by Iowa Gold for recycling. At the time of the inspection, some of the 55-gallon drums of used oil filters were not closed. According to Mr. Graden, the containers were open because the facility was in the process of transferring the used oil filters into the roll-off container. This is an Area of Concern. The facility should ensure that the used oil filters are kept covered except when adding or removing used oil filters. The roll-off container was covered and labeled with the words "Used Oil Filters."

The facility no longer offers a parts washer service to its customers. There was one parts washer on-site, but it did not contain any solvent.

Record Review:

IWO is a certified used oil transporter/transfer facility and a registered used oil filter transporter/transfer facility. The facility is currently registered with the State of Florida, but did not have its registration displayed in a prominent place at the facility [Section 62-710.500(4), FAC]. During the inspection, the facility displayed the registration. IWO has submitted an annual report summarizing the on-site records for the previous calendar year.

IWO has records for the previous three years on-site and available. IWO has records documenting the quantity of used oil picked-up at generator facilities and the quantity of used oil dropped-off at used oil-processing facilities. One acceptance record (9/6/12, manifest # 22393) was found to not have documentation of halogen screening [40 CFR 279.44(d)]. In addition, all of the used oil manifests did not have the type code and the end use code as required by Section 62-710.510(1)(d) and 62-710.510(1)(f), FAC, respectively.

The facility did not have training records on-site and available for review. According to Suzi Graden, Vice President, IWO sent its used oil training manual to the Department's Tallahassee office. This is an Area of Concern. Currently, IWO is working with Tallahassee to document employee training. A copy of this employee training should be kept on-site.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
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Rule: 279.44(d)

Explanation: The facility did not document halogen screening on manifest number 22393 (9/6/12).

Corrective Action: The facility sent documentation to the Department on 1.22.13, returning to compliance. No further action is necessary.

Type: Violation

Rule: 62-710.500(4)

Explanation: The facility did not display its current registration in a prominent place at the facility.

Corrective Action: The facility returned to compliance during the inspection. No further action is necessary.

Type: Violation

Rule: 62-710.510(1)(d)

Explanation: The facility did not have type code on any of the used oil manifests or equivalent forms.

Corrective Action: The facility sent documentation to the Department on 1.22.13, returning to compliance. No further action is necessary.

Type: Violation

Rule: 62-710.510(1)(f)

Explanation: The facility did not have end use code on any of the used oil manifests or equivalent form.

Corrective Action: The facility sent documentation to the Department on 1.22.13, returning to compliance. No further action is necessary.

Areas of Concern

Type: Area Of Concern

Rule: 62-710.600(2)(c)

Explanation: The facility did not have its training manual on-site for review.

Corrective Action: According to Mrs. Graden, the facility sent its copy to Tallahassee for review when it submitted its last registration renewal. A letter was sent to the facility on 12.12.12 from Tallahassee asking the facility to update its training manual.

Type: Area Of Concern

Rule: 62-710.850(5)(a)

Explanation: At the time of the inspection, some of the facility's used oil filter containers were not closed.

Corrective Action: According to Mr. Graden, the contents of these containers were in the process

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of being added to the roll-off. The facility should ensure to keep all used oil filter containers stored outside be kept closed.

The facility sent documentation to the Departement on 1.22.13, assuring used oil filter drums would be kept closed.

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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.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

1/24/2013

DATE**Supervisor:** Jabe Breland III**Inspection Approval Date:** 01/24/2013

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.