

NOTICE OF POTENTIAL HAZARDOUS WASTE NON-COMPLIANCE – Page 1 of 2

FACILITY NAME <i>Jam Environmental</i>		TYPE OF INSPECTION: CAV: <input type="checkbox"/> CEL: <input checked="" type="checkbox"/> CI: <input type="checkbox"/> OTHER: <input type="checkbox"/>	
ADDRESS <i>228 SW 21st Ter.</i>	CITY <i>Ft. Lauderdale</i>	STATE <i>FL</i>	ZIP CODE <i>33312</i>
EPA ID NUMBER <i>FLR000176842</i>	DATE OF INSPECTION <i>11/28/12</i>	PAGE <i>1</i>	OF <i>2</i>
FOLLOW UP CAV INSPECTION WITHIN 120 DAYS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

A hazardous waste/used oil compliance inspection was made this date, under the authority of Section 403.091, Florida Statutes (F.S.), to determine your facility's compliance with Chapter 403, F.S. and Chapters 62-730 and 62-710, Florida Administrative Code (F.A.C.). Provisions of Title 40 Code of Federal Regulations (C.F.R.) Parts 260 through 268 and 279, which are cited on this form, have been adopted by reference as the state hazardous waste and used oil rules in Chapter 62-730 and 62-710, F.A.C. The following 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 which exist at the time of this inspection.**

GENERAL REQUIREMENTS:

- ☐ Failure to ensure delivery of HW to proper HW facility § 261.5
- ☐ Failure to provide hazardous waste determination § 262.11
- ☐ Failure to notify as generator § 262.12
- ☐ Failure to use a manifest or reclamation agreement § 262.20
- ☐ Failure to provide personnel training § 265.16, 262.34
- ☐ Evidence of release(s) of waste § 265.31
- ☐ Facility exceeds 90/180 day time limit § 262.34

CONTAINER MANAGEMENT:

- ☐ Unlabeled containers § 262.34
- ☐ Undated containers § 262.34
- ☐ Leaking or bulging containers § 262.34
- ☐ Open containers § 265.173
- ☐ Inadequate aisle space § 62-730.160

USED OIL VIOLATIONS:

- ☒ Failure to label containers § 279.22
- ☐ Failure to respond to releases § 279.22
- ☐ Failure to document used oil disposal § 279.10

RECORDKEEPING REQUIREMENTS:

- ☐ Manifests § 262.40, § 262.44
- ☐ Training records § 262.34
- ☐ Contingency Plan § 262.34
- ☐ Weekly Inspection records § 62-730.160
- ☐ Information not posted by phone § 262.34
- ☐ Authorities not notified § 262.37

MATERIALS PROVIDED to assist in accomplishing corrective actions

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> DEP Small Quantity Generator Handbook | <input type="checkbox"/> EPA Managing Used Oil | <input checked="" type="checkbox"/> Mercury Lamp Recyclers |
| <input type="checkbox"/> EPA Understanding the Hazardous Waste Rules | <input type="checkbox"/> Environmental Yellow Pages | <input checked="" type="checkbox"/> Other <i>used oil stencil</i> |
| <input type="checkbox"/> EPA Notification of Regulated Waste Activity | <input type="checkbox"/> List of HW/Used Oil Transporters | <input checked="" type="checkbox"/> Other <i>used oil guidance</i> |
| <input type="checkbox"/> Florida Automotive Recyclers Handbook | <input type="checkbox"/> Antifreeze Recycling Vendors | <input type="checkbox"/> Other _____ |

Florida Fact Sheets

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Antifreeze for Recycling / Waste Antifreeze | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Hazardous Waste Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Used Oil/Used Oil Filter Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> Other: _____ |

ITEMS REQUESTED OR RECOMMENDATIONS BY THE "INSPECTOR":

- ① Used oil transfer containers not labeled used oil. Provide the Department a photo of used oil containers labeled properly.
- ② One 500-gal. used oil tank was not properly closed. Provide the Department a photo of the tank properly closed.
- ③ Spent lamps were not properly labeled and boxed and no disposal records or service contract available for review. Provide the Department a photo of spent lamps properly boxed and a service contract.
- ④ Used oil manifests in 2010, 2011, & 2012 did not indicate a halogen test was performed. Perform employee training and provide the Department a copy of the sign in log.

OWNER/OPERATOR COMMENTS:

The owner/operator is hereby requested to submit in writing, within 7 days of this inspection, 1) a description of all corrective actions taken, 2) a schedule for completion of corrective actions to be taken and 3) a description of efforts to prevent recurrence of the above items to the person signing as "INSPECTOR", Florida Department of Environmental Protection, 400 North Congress Avenue, Suite 200, West Palm Beach, FL 33401. The actions taken within ___ days of this notice will be considered in determining whether enforcement, including the assessment of penalties, should be initiated.

IF YOU HAVE QUESTIONS, contact: Greg Whitaker at (561) 681-6600. ⁶⁷²⁸

"INSPECTOR" (signature): [Signature] Date: _____

The undersigned person hereby acknowledges that he/she received a copy of this notice and has read and understands the same.

SIGNATURE: <u>[Signature]</u>	PRINTED NAME: <u>Brian S. McElly</u>
TITLE: <u>President</u>	DATE: <u>11/28/12</u>

MANIFEST INSPECTION LOG

Date:

Facility:

Facility EPA ID#:

TSD:

TSD EPA ID#:

sealed
mineral
oil -
inst.

AG: above ground tank.

JAM ENVIRONMENTAL & Vacuum Services, LLC
Halogen Detection Procedures for Used Oil

Each JEVS Used Oil Collection driver **Will Perform** the Following Prior to each day's collections.

1. Perform Battery Test – Spare Batteries are kept in the Warehouse Refrigerator
2. Inspect equipment for damage, ensure tip is clear of oil and debris, check cotton filter tip.
3. Check sniffer against new oil and the 900 ppm Halogen standard - ensure alarm function is working
4. Do not use equipment if the sniffer fails to alarm or equipment is damaged
5. Ensure you have a supply of Dexil 1,000 or 4,000 test kits in your truck

Operation of Halogen Sniffer at Customer Location

1. Power Unit up prior to opening tank – allow unit to stabilize
2. Open cap or remove plug from customers used oil storage tank(s)
3. Quickly place tip 3 to 5 inches from opening – Protect from wind and breezes to ensure accurate reading.
4. Allow Unit to stabilize – gasoline or diesel may cause unit to beep until fumes dissipate
5. **If equipment does not alarm – Mark JEVS Manifest as HALOGEN TEST PERFORMED? YES and PASS.**
6. If equipment alarms (fast or continuous beep) then customers oil needs to be tested with a Dexil 1,000 or 4,000 test kit.
 - a. Take sample and place in glass jar
 - b. Inform customer that the Dexil will need to be performed because of potential contamination.
 - c. Note on JEVS Manifest that Sniffer Alarmed (**Test Failed**)
 - d. Follow Dexil Procedures
 - e. If Dexil shows greater than 1,000 ppm Then Mark Manifest as “**Dexil Fail**”
 - f. Write on Manifest – “**Reject Load – Do Not Pump**” – Give manifest to Customer
 - g. Notify Office Immediately – We can arrange disposal with another company – JEVS will not handle this product.
 - h. If Dexil shows that contamination is less than 1,000 ppm then Mark results on Manifest – Explain to customer – Pump Oil
 - i. **Always offer to tour shop with customer to determine the potential sources of chlorinated compounds – Let customer know that there are many effective alternatives to chlorinated materials and if they insist on using them then they need to take appropriate cautions to not contaminate the used oil. Always Educate – Do not Lecture.**

- j. Add note in Work Order Comment Section to use extra caution on future collections.