From:	Maria Laboy
To:	Whitaker, Gregory;
cc:	Sean Hagerott; Jack McCully;
Subject:	Response to Notice of Potential Hazardous Waste Non-Compliance from JAM Environmental & Vacuum Services LLC
Date:	Thursday, December 06, 2012 5:13:14 PM
Attachments:	Response to FDEP Notice of Potencial Hazardous Waste Non-Compl.pdf

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Mr. Whitaker:

As per Mr. Hagerott instructions, please find attached our response to the Notice of Potential Hazardous Waste Non Compliance issued to JAM Environmental & Vacuum Services LLC on November 28, 2012. We are sending the hard copies by mail today as well. Please advice if any further action is necessary.

Respectfully,

Maria E Laboy
JAM Environmental & Vacuum Services LLC
228 SW 21st TER, Bldg. 6
Fort Lauderdale, FL 33312
954.625.2310

228 SW 21st Terr., Bldg #6 - Ft. Lauderdale, FL 33312
Office 954-625-2310 / Facsimile 954-625-2311

December 6, 2012

Mr. Greg Whitaker
Gregory.Whitaker@dep.state.fl.us
Environmental Specialist II
FDEP-Southeast District
400 N. Congress Ave., Suite 200
West Palm Beach, FL 33401-2319

Re: Response to Notice of Potential Hazardous Waste Non-Compliance to JAM Environmental & Vacuum Services LLC

We wish to respond to the Notice of Potential Hazardous Waste Non-Compliance issued on November 28, 2012 to JAM Environmental & Vacuum Services LLC at the conclusion of the inspection conducted the same day. You will find enclosed a response in which the recommendation is listed first and then following each recommendation is our response.

We hope this provide correction to the recommendations requested.

Respectfully,

Sean Hagerott
Vice President of Operations
JAM Environmental & Vacuum Services LLC

Xc: Mr. Brian S. McCully

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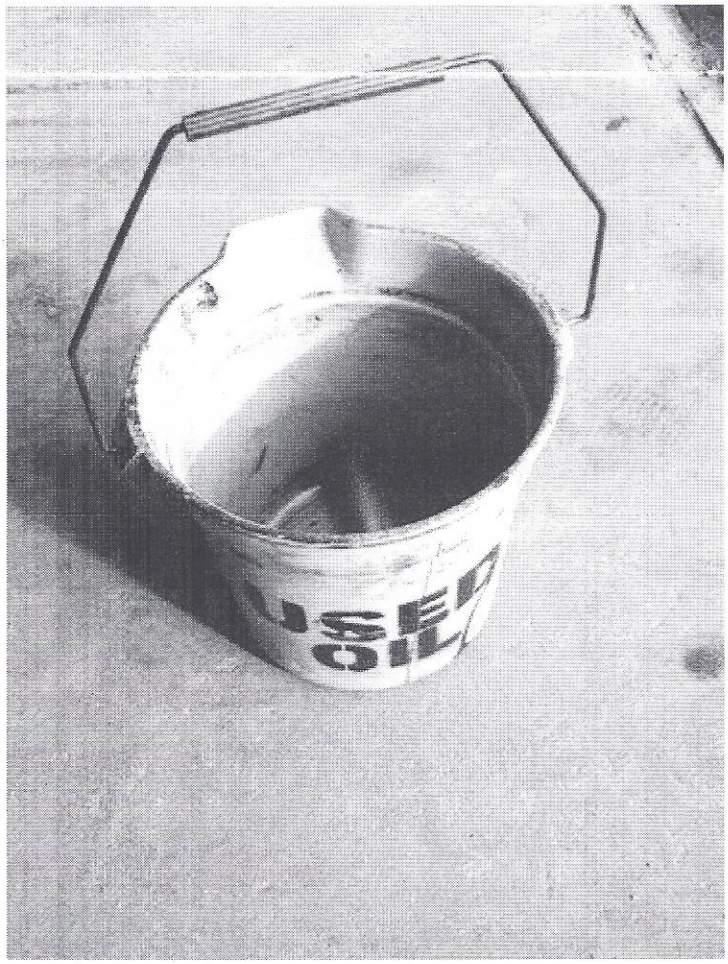
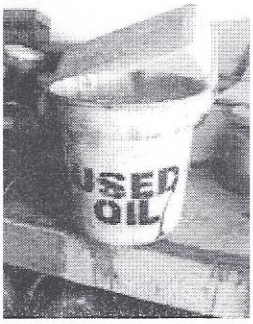
1. Used oil transfer container is not labeled used oil. Provide the Department a photo of used oil container labeled properly.

See below the photo of the container properly labeled and empty.





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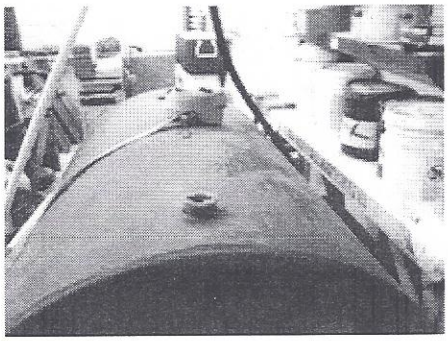
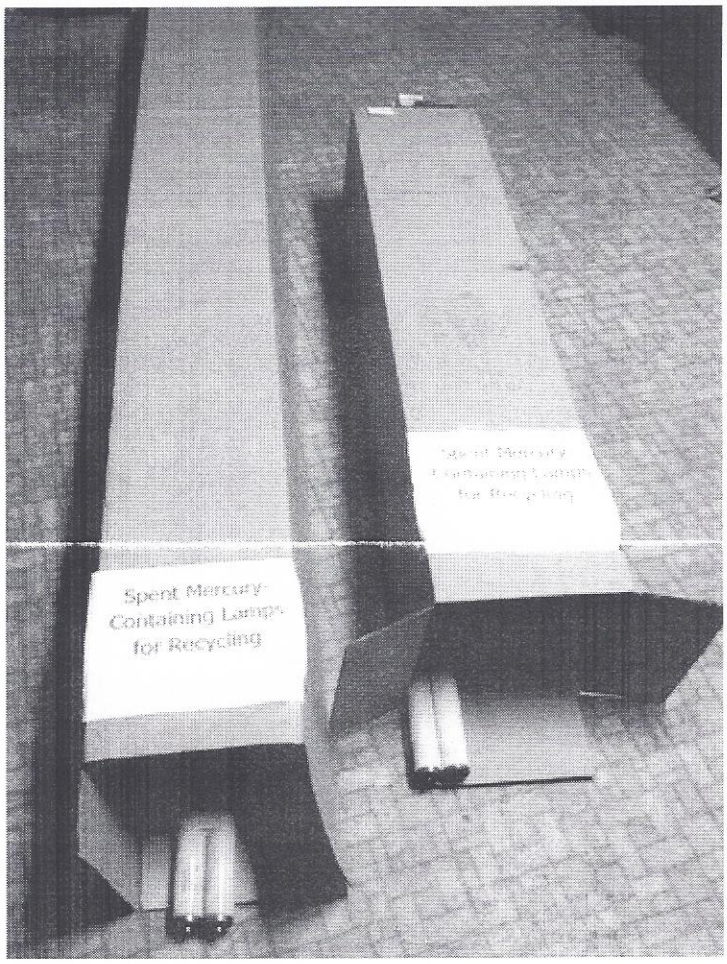
2. One 500 gallons used oil tank was not properly closed. Provide the Department a photo of the tank properly closed.

   See the 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 with a photo of spent lamps properly boxed and a service contract.

   See the photo of the spent lamps and the service contract below.


Spent Mercury-
Containing Lamps
for Recycling

CLEAN FUELS of florida, inc.

CONTRACT

Jam Environmental & Vacuum Services
222 S.W. 21st Terrace Building 6
Fort Lauderdale, FL 33312

Date: November 30, 2012
Telephone: 954-625-2311

Attn: Jack McCully

Description
Fluorescent Bulbs .19LFft

Note: Contract Includes Disposal, Transportation and Documentation.

TERMS AND CONDITIONS

1. **PRICE TERM:** Prices are valid for 30 days and are subject to change thereafter, without notice, at the option of the undersigned.
2. **ESTIMATE:** Above volumes are based on best available estimates and information at the time of field survey. Therefore, totals quoted are an approximation. Client will be notified immediately if site conditions or quantities change. At that time Client shall issue a change order or Clean Fuels will perform only work stated in this quotation. Final bill will reflect actual quantities and work performed. Client agrees to pay for actual quantities and work.
3. **WORK HOURS:** Work to be performed during normal working hours (Monday through Friday 8:00am to 5:00pm). All work performed outside these hours will be billed at 25% over normal rates to counter overtime costs for labor and equipment. Work performed on Sundays or holidays shall be billed at a rate of 50% over normal rates.
4. **WASTE MATERIALS:** All disposal pricing is contingent upon completion and acceptance of material profile sheet for the designated facility. Should additional analysis of waste materials be required for recycle or disposal facility or any other entity. Client agrees to pay for said analyses and costs associated with collection, chain of custody and delivery to laboratory.
5. **ACCEPTANCE OF COMPLETION:** Client or authorized representative must be present on site at the completion of the project and/or at the time of pickup of waste materials to sign and accept related paperwork. Client may opt to assign Clean Fuels as an authorized agent by executing an Authorized Agent Notification form. In the event Client chooses this option, Client agrees to pay for any expenses Involved.
6. **PAYMENT:** Unless Client has established credit with Clean Fuels or has made other payment arrangements, terms shall be COD or, in some cases a deposit or prepayment may be required. We accept most major credit cards. Credit card transactions will be billed an additional 5% processing fee.

If you have any questions please call Steve Becker at (954)791-9588

ACCEPTANCE
Steve Becker
Clean Fuels of Florida
Date 11-30-12

ACCEPTANCE
Jack McCully
Jam Environmental & Vacuum Services
Date 11/30/12

2635 NE 4th Avenue, Pompano Beach, FL 33064
Office: (954) 791-9588 • Fax: (954) 791-9386 • Toll Free (800) 725-8711 • www.clean-fuels.net

228 SW 21st Terr., Bldg #6 - Ft. Lauderdale, FL 33312
Office 954-625-2310 / Facsimile 954-625-2311

4. Used oil manifests in 2010, 2011 and 2012 did not indicate a halogen test was performed. Perform employee training and provide the Department a copy of the sign in log.

   See the copy of the Training sign-in log and the training material below.

228 SW 21st Terrace, Bldg. 6
Fort Lauderdale, FL 33312
Phone 954.625.2310 Fax 654.625.231

Halogen Detection Procedures for Used Oil

Date 11/30/2012 Trainer- Sean Hagerott TIME 5:00PM

Attendees name and signature

NAME	Signature
Linda Bisbey	Linda Bisbey
Brian McCully	
Dayana Leon	
Hector Leon	
Shane Lewis	
Ronald Richards	
Mark Thomas	

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 then 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 then 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.**