

To: Montinique Buquoi
Cc: Elliott
Subject: Inspection of your Miami facility on 11/5/2013
Attachments: final inspection_report1152013.pdf

The purpose of this email is to acknowledge return to compliance from the Department's inspection on November 5, 2013 at the above mentioned facility. Attached please find the final report for that inspection. Please feel free to contact me if you have any questions concerning this matter or any other compliance issue. Thank you for your cooperation in this matter.

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Hazardous Waste Compliance/Enforcement
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Work Hours - 7 am to 5 pm Monday to Thursday
I am not in the office on FRIDAYS

Florida's Water - Ours to Protect: Check out the latest information on Florida Water Issues at <http://www.protectingourwater.org/> presented by the Florida Department of Environmental Protection.



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Ricky's Oil & Environmental Services LLC
On-Site Inspection Start Date: 11/05/2013 **On-Site Inspection End Date:** 11/05/2013
ME ID#: 53784 **EPA ID#:** FLD981019755
Facility Street Address: 7209 Nw 66th St, Miami, Florida 33012
Contact Mailing Address: PO BOX 669295, Miami, Florida 33166-9430
County Name: Miami-Dade **Contact Phone:** (770) 486-0727

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility
Routine Inspection for Used Oil Generator facility
Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Marketer facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector
Other Participants: Terry Swaim, Manager

LATITUDE / LONGITUDE: Lat 25° 50' 2.7648" / Long 80° 18' 53.3203"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

Ricky's Oil Service, Inc. (ROS) is a permitted facility authorized to process used oil. ROS is also a registered used oil transporter, used oil transfer facility, used oil marketer, used oil filter transporter, and a used oil filter transfer facility. The facility consists of a tank farm inside secondary containment, two office trailers, and a small parking lot and is totally surrounded by a security fence. The facility is situated on a 0.7 acre site in a heavy industrial area, and is served by city water and sewer. The facility has been operating on this site for at least the last 30 years and employs 12 people.

Compliance History:

ROS was last inspected on July 14, 2011. One minor labeling violation and several minor recordkeeping violations were noted and the facility was allowed to return to compliance without enforcement.

Process Description:

ROS has 11 tanks on site with a total capacity of 25,000 gallons. All oil is offloaded to tank eight unless it has a water content of less than five percent. If this is the case, the oil would be considered on-spec and is stored in one of ROS's finished product tanks for marketing to their

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customers. Only tank eight is used for processing and ROS only does passive processing; no heat is used. However, emulsifier is sometimes added to the tank to aid in oil/water separation. The waste water that is generated from this process is shipped to either Cliff Berry's Miami facility (EPA ID #FLD058560699) or Raider Environmental Services (EPA ID #FLR000143891), also located in Miami. Also stored within the secondary containment structure are two 20 yard rolloffs, one for used oil filters and the other for oily solids. ROS ships the used oil filters to US Foundry (EPA ID #FLD004128336) in Miami and the oily solids are sent to the Central Landfill in Broward County.

Facility Tour

During the facility tour, these issues were noted. Behind the red cargo trailer and along the fence line were two oversized yellow plastic containers that were covered with a tarp and appeared to contain used oil. Upon removing the tarp, it was discovered that one of the two containers had oily water on top and one or both of those containers could possibly have been leaking as there was a small area of stained soil on the ground in front of the containers. In that same area was a black drum which also appeared to contain used oil. It was also observed that some of the used oil filter containers brought into the facility on the day before the inspection were still waiting for consolidation and had not been properly labeled.

Records Review:

The facility's Contingency Plan was adequate; however, the facility couldn't produce documentation proving that the Contingency Plan had been distributed to the local authorities. All other records appeared to be in order: i.e. manifests, acceptance and delivery logs, general facility inspection logs, training records, the waste analysis plan and the closure plan.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.52(b)(3)
Question Number:	28.360
Question:	Has the plan been distributed to the:
Explanation:	At the time of the inspection, the facility couldn't produce documentation proving that the Contingency Plan had been distributed to the local authorities.
Corrective Action:	Please provide receipts proving distribution of the Contingency Plan to local authorities.

Type:	Violation
Rule:	279.54(b)
Question Number:	28.170
Question:	Are containers and tanks in good condition and not leaking?
Explanation:	Behind the cargo trailer and along the fence line were two oversized yellow plastic containers that were covered with a tarp and appeared to contain used oil. Upon removing the tarp, it was discovered that one of the two containers had oily water on top and one or both of those containers could possible have been leaking as there was a small area of stained soil on the ground in front of the containers. In that same area was a black drum which also appeared to contain used oil.
Corrective Action:	Please cleanup the area behind the cargo trailer; pump out the two yellow

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containers and the black drum. Also, removed the stained soil in the area and send pictures showing the empty drums and the containerized soils.

Areas of Concern

Type: Area Of Concern

Rule: 62-710.850(5)(a)

Question Number: 5.140

Question: Are used oil filter containers labeled "Used Oil Filters"?

Explanation: Some of the used oil filter containers brought into the facility on the day before the inspection were still waiting for consolidation and had not been properly labeled.

Corrective Action: Please remember to check the used oil filter containers upon arrival to make sure they are properly labeled; especially if they are going to sit overnight before consolidation.

Conclusion:

The facility was not in compliance at the time of the inspection and was given 14 days to return to compliance. On November 11, 2013, the Department received documentation and photos demonstrating that all of the issues relating to the physical tour of the facility had been resolved.

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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.

Kathy R. Winston _____

PRINCIPAL INSPECTOR NAME

Inspector _____

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

2/24/2014 _____

DATE

Supervisor: Karen Kantor

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.