



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

FACILITY INFORMATION:

Facility Name: Diversified Marine Tech Inc
On-Site Inspection Start Date: 02/09/2016 **On-Site Inspection End Date:** 02/09/2016
ME ID#: 40523 **EPA ID#:** FLD984182733
Facility Street Address: 2531 Causeway Blvd, Tampa, Florida 33619-5151
Contact Mailing Address: 1201 N 22nd Street, Tampa, Florida 33605
County Name: Hillsborough **Contact Phone:** (813) 248-3256

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant
Other Participants: Jamie Arleo, ES III; Gerry McCormick Jr., Vice President

LATITUDE / LONGITUDE: Lat 27° 55' 47.3095" / Long 82° 25' 40.105"

SIC CODE: 4941 - Trans. & utilities - water supply

TYPE OF OWNERSHIP: County

Introduction:

Diversified Marine Tech, Inc. ("DMT") was inspected in conjunction with its sister company, Diversified Environmental Services, Inc. ("DES"). Gerry McCormick Jr. provided access and information during the inspections. Both companies are currently registered with the Department as used oil transporters and transfer facilities, but neither has a permit for used oil processing. The companies do not market used oil fuel. All oil is shipped to off site facilities for additional processing and marketing.

DMT operates at the Port of Tampa, with a full service wet berth in addition to a dry docking system. The company can also service ships elsewhere in the port and transport waste from the ships to the DMT dock for transfer to shore facilities.

DES has offices, parking areas for transportation equipment, a maintenance shop and a centralized wastewater treatment unit that discharges to the City of Tampa's sewer system under a pretreatment permit at it's main facility at 1201 N. 22nd St., Tampa. Records for both companies are maintained at DES.

Process Description:

DES currently operates nine vacuum trucks, five tankers and five tractors. Two of the vacuum trucks operate at their Texas location. DES also has eleven frac tanks, plus rental units. DES also owns three tugs and a 16,250 barrel capacity steel double-hulled tank barge, the DES 1625 which was built in 1970.

DMT provides ship maintenance services and repairs. The company sometimes generates conditionally exempt amounts of waste, mainly from painting activities, but none was on site the date of the inspection. Oily waste from bilge cleaning, butterworth and other maintenance is transported over water in the DES barge. The barge also is used to allow passive gravimetric

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separation of oil and water. Frac tanks are also staged at DMT for holding oily waste. They are not provided with secondary containment as required for containers or tanks at used oil transfer facilities. None were labeled with the words "Used Oil." Oily waste water is transferred to trucks or tankers for transport to the DES facility. Sewage that is pumped from ship holding tanks is taken directly to the City of Tampa's Howard Curran treatment facility for discharge.

DES accepts industrial waste water for pretreatment in a NPDES permitted Centralized Wastewater Treatment Unit that discharges to the City of Tampa's Howard Curran wastewater treatment facility. Since the previous inspection, DES modified their permit to accept all types of industrial waste water (Category D.) The water treatment plant includes six, 10,000 gallon tanks holding tanks for water, which is tested prior to discharge to the POTW. Solids precipitated during treatment are separated from the waste water in a cone bottom tank, and then dewatered in a filter press prior to disposal off site, to Clark Environmental. The solids are tested regularly and are not characteristically hazardous.

Recovered oil is currently being stored in frac tanks at both facilities. Mr. McCormick said that oil with excessive water is sometimes transported back to the barge, where it is stored to allow additional gravimetric separation. Mr. McCormick indicated that the frac tanks at DMT contained varying amounts of oil and water. Due to market conditions, and inability to meet water content limits, DES and DMT did not ship any recovered oil to an off site processor between September 14, 2015 and the date of this inspection.

Oil transfer records between DMT and DES were on file. The records included the EPA identification numbers of both companies. All records included a notation "halogens less than 1,000 ppm." Three records for oil transferred from DES to DMT did not include a signature. the most recent record on file was from September 6, 2015.

Recovered oil is brokered by Sunrise Environmental. In 2015, off specification used oil was marketed to Oil Recovery, Inc. in Camillia Ga., GAR000054480. One load was rejected on April 9, 2015 and returned to DES due to a water content of 35%. It was not rejected due to excess halogens. A shipping record from August 13, 2015 did not include the shipper's EPA identification number. Earlier in the year, oil was also shipped to Georgia Petroleum, GAD981222433 as "non hazardous used oil." The most recent disposal record on file to any other transporter or processor was from September 14, 2015.

New Potential Violations and Areas of Concern:

Violations

Type: Violation
Rule: 279.45(d)
Explanation: Used oil containers (frac tanks) were not provided with secondary containment.
Corrective Action: All used oil containers and tanks located at used oil transfer facilities must be provided with impervious secondary containment consisting of, at a minimum a dike, berm or walls and a floor.

Type: Violation
Rule: 279.45(g)(1)
Explanation: Frac tanks and a barge holding used oil were not labeled with the words "used oil."
Corrective Action: All containers and tanks holding used oil at used oil transfer and processing facilities must be labeled with the words "used oil."

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Type: Violation
Rule: 62-710.800(2)
Explanation: DES and DMT have stored used oil more than 35 days without obtaining a permit from the Department or complying with the standards applicable to used oil processing facilities.
Corrective Action: DES and/or DMT must submit a complete application for a used oil processing permit. Oil may not be stored more than 35 days without a permit from the Department.

Conclusion:

DES and DMT have stored used oil more than 35 days without complying with regulations applicable to used oil transfer facilities or processors. In addition, in Florida, this storage would require the facility to obtain a permit as a used oil processing facility.

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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.

Elizabeth Knauss
PRINCIPAL INSPECTOR NAME

Environmental Consultant
PRINCIPAL INSPECTOR TITLE

E. Knauss
PRINCIPAL INSPECTOR SIGNATURE

FDEP - SWD
ORGANIZATION

4/8/2016
DATE

Supervisor: Beth Knauss

Inspection Approval Date: 04/13/2016

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.