



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

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**FACILITY INFORMATION:**

**Facility Name:** Fuels Unlimited Inc

**On-Site Inspection Start Date:** 06/09/2016

**On-Site Inspection End Date:** 06/09/2016

**ME ID#:** 42065

**EPA ID#:** FLR000050369

**Facility Street Address:** 509 S French Ave, Sanford, FL 32771-1875

**Contact Mailing Address:** 509 S French Ave, Sanford, FL 32771-1875

**County Name:** SEMINOLE

**NOTIFIED AS:**

Used Oil Processor

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: John E. White, Inspector

Other Participants: Daniel Hall, Inspector; Karen Violet, Vice President

**LATITUDE / LONGITUDE:** Lat 28° 48' 27.0915" / Long 81° 16' 22.215"

**SIC CODE:** 5172 - Wholesale trade - petroleum products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On June 9, 2016, John White and Daniel Hall, Florida Department of Environmental Protection (FDEP), inspected Fuels Unlimited for compliance with state and federal hazardous waste and used oil regulations. Karen Violet, Vice President of Fuels Unlimited, Inc. (Fuels Unlimited), represented the facility. The facility's registration as a used oil transporter, used oil transfer facility, used oil marketer, used oil filter transporter, used oil filter transfer facility, and used oil filter processor expires on June 30, 2017.

Fuels Unlimited, Inc. d/b/a Oils Unlimited notified the Department of its hazardous waste activities as a used oil handler and a hazardous waste non-handler in a notification received on November 25, 2009. The facility was issued EPA identification number FLR000050369 on December 15, 2009. Fuels Unlimited, Inc. was issued used oil processor permit #266845-HO-002 on September 9, 2012, which expires on March 26, 2017. Fuels Unlimited has operated at this location since 2005 and is currently running four pump trucks and one tanker truck. The facility has two drivers and operates five days per week, 6:30 AM to 5:00 PM.

**INSPECTION HISTORY (Past 5 Years)**

Fuels Unlimited was last inspected on July 25, 2014, and was not in compliance at that time. Violations cited included failure to rebut the presumption that used oil was hazardous waste due to halogen content and failure to analyze used oil shipments and maintain the documentation on site. A Short Form Consent Order, OGC case number 15-0669, was executed on December 1, 2015, and included payment of \$8,500.00 in penalties and Department costs.

Fuels Unlimited was inspected on May 11, 2011, and was not in compliance at that time. Violations cited included failure to record used oil generator EPA identification numbers on shipping papers, failure to ensure emergency coordinators are thoroughly familiar with the location of all records within the facility, failure to maintain all required documents and registrations, failure to provide a used oil storage tank with secondary containment, failure to submit required annual operating reports, and failure to complete a waste determination on all solid wastes generated on site. A Short Form Consent Order, OGC case number 12-0847, was executed on March 22, 2012, and included payment of \$7,930.00 in penalties and Department costs.

Inspection Date: 06/09/2016

**Process Description:**

Fuels Unlimited is a used oil broker operating on 0.39 acres of land. Used oil is stored in aboveground storage tanks on site. Used oil is either picked up at generator sites by a tanker truck owned and operated by Fuels Unlimited, or it is brought to the site by a tanker truck operated by a vendor. Drivers test the used oil for halogens upon pick up at the generator location. The used oil in the tanker is tested again for halogens upon arrival at the facility prior to off-loading into the tanks. An outside laboratory, American Testing Technologies, Inc., located in Akron, Ohio, is used to analyze oil marketed to burners.

Fuels Unlimited does not perform any used oil processing on-site. The facility consists of an office, eight above ground tanks, an equipment shed, a spill control shed, and a used oil transfer area. Six tanks are used for storage of used oil and have a combined storage capacity of 112,000 gallons. One tank has a storage capacity of 5,000 gallons and is used for storage of oily water. One tank has a storage capacity of 5,000 gallons and is used for storage of used antifreeze. Petroleum contact water (PCW) is not managed on site.

Used oil is off-loaded from trucks in a bermed area. Any releases during off-loading are contained in a secondary containment area and will be pumped into a 55-gallon drum. Used oil filters removed from trucks are placed in 55-gallon drums. Used absorbents are placed in a labeled 55-gallon drum.

All tanks within the tank farm are provided with secondary containment. The secondary containment area was clean and appeared to be in good condition. Located within a storage container were thirteen 55-gallon drums storing used oil filters. Used oil filters are shipped to US Foundry in Medley, Florida, for reclamation and reuse of metals. Used antifreeze is shipped to On-Site Antifreeze Recycling in Fort Myers, Florida. Vehicles are serviced off-site by Thomas Trucking.

The certificate of liability insurance for a used oil handler was received by the Department on May 16, 2016. No issues were noted. Review of shipping papers for on-specification fuel were reviewed and no issues were noted. Shipping papers for used oil received were reviewed. The facility is documenting EPA identification numbers, where available, and marking a check box noting halogen content has been tested. Drop tickets documenting date and total oil volume are maintained for all the oil loads delivered by each specific driver.

Logs are being maintained documenting the volume of oil placed in each of the tanks. When a tank is full it is locked out and sampled. No additional oil is placed in the tank until the volume at the time of testing has been drawn down. In some cases, on-specification oil is pulled from two separate tanks to provide the required volume to the burner. In those cases both sets of oil analysis accompany the load. It was noted the facility measures the inches of oil removed from the tanks then converts to gallons as the oil chart for the older tanks is not an exact enough measure.

**Conclusion:**

Fuels Unlimited was inspected as a used oil transporter, marketer, and processor and was in compliance at the time of this inspection.

Inspection Date: 06/09/2016

**1.0 - Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	Unk	N/A
1.1	Has the facility notified with correct status? 262.12	✓			
1.2	Has the facility notified of change of status? 62-730.150(2)(b)				✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓			

Inspection Date: 06/09/2016

**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.

John E. White

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE**

FDEP

**ORGANIZATION**

Daniel Hall

**Inspector NAME**

Inspector

**Inspector TITLE**

FDEP

**ORGANIZATION**

Karen Violet

**Representative NAME**

Vice President

**Representative TITLE**

Fuels Unlimited

**ORGANIZATION**

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.

**Report Approvers:****Approver:**

Christine Daniel

**Inspection Approval Date:**

08/16/2016