

From: [Scarborough, Jill R.](#)
To: [Kantor, Karen E.](#); [Perrigan, Glen](#)
Cc: [Andreotta, Jason](#); [Blandin, Norva](#); [Winston, Kathy](#); [Bahr, Tim](#); [Walker, Kim \(Waste\)](#)
Subject: RE: Request for Case Classification Review - Havana Waste Oil Service EPA ID FLR000218925
Date: Wednesday, March 22, 2017 1:29:25 PM
Attachments: [Case Review Havana Waste Oil Service EPA ID FLR000218925 2-23-17.pdf](#)
[image004.png](#)
[image006.png](#)
[image013.png](#)
[image017.png](#)
[image019.png](#)
[image023.png](#)
[image025.png](#)
[image027.png](#)
[image029.png](#)
[image031.png](#)
[image033.png](#)
[image035.png](#)
[inspection_report Havana Waste Oil Service EPAID FLR000218925 2-23-17.pdf](#)
[Facility Havana Waste Oil Service FLR000218925 2-23-17.xlsx](#)
[Case Review Havana Waste Oil Service EPA ID FLR000218925 with Div comments.pdf](#)

Karen,

The Division has completed a Case Specific Classification Review of Havana Waste Oil Service, FLR000218925. At this time, the Division concurs with the District that formal enforcement is not appropriate.

Thank you,

Jill Scarborough

From: Kantor, Karen E.
Sent: Wednesday, March 22, 2017 12:31 PM
To: Perrigan, Glen <Glen.Perrigan@dep.state.fl.us>; Scarborough, Jill R. <Jill.R.Scarborough@dep.state.fl.us>
Cc: Andreotta, Jason <Jason.Andreotta@dep.state.fl.us>; Blandin, Norva <Norva.Blandin@dep.state.fl.us>; Winston, Kathy <Kathy.Winston@dep.state.fl.us>
Subject: Request for Case Classification Review - Havana Waste Oil Service EPA ID FLR000218925

Glen/Jill:

Please find attached the request for a case review for a secondary violator inspection.

Thank you!

| Karen Kantor, PG



Environmental Manager - Compliance Assurance

Florida Department of Environmental Protection

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karen.e.kantor@dep.state.fl.us

Office: 561-681-6670

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Fax: 561-681-6755



From: Blandin, Norva

Sent: Friday, March 17, 2017 12:49 PM

To: Kantor, Karen E.

Subject: RE: Case Classification Review - minor OC Havana Waste Oil Service EPA ID FLR000218925

Karen:

I made some edits (as per your recommendation) and show up that CCR has just 3 green. Take a look and let me know is ok. ☺

Regards,

Norva Blandin, MSEM

Environmental Specialist III - Compliance Assurance

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From: Kantor, Karen E.

Sent: Thursday, March 16, 2017 3:30 PM

To: Blandin, Norva <Norva.Blandin@dep.state.fl.us>

Subject: RE: Case Classification Review - minor OC Havana Waste Oil Service EPA ID FLR000218925

You sent me a revision while I was reviewing the first...please see below and attached



Karen Kantor, PG

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From: Kantor, Karen E.

Sent: Friday, March 10, 2017 12:29 PM

To: Blandin, Norva <Norva.Blandin@dep.state.fl.us>

Subject: FW: Case Classification Review - minor OC Havana Waste Oil Service EPA ID FLR000218925

See attached report revisions...this is the first version of the report you sent me. Guidelines and case review form need to be revised



Karen Kantor, PG

Environmental Manager - Compliance Assurance

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From: Blandin, Norva

Sent: Wednesday, March 1, 2017 4:18 PM

To: Kantor, Karen E. <Karen.E.Kantor@dep.state.fl.us>

Subject: Case Classification Review - minor OC Havana Waste Oil Service EPA ID FLR000218925

Karen;

Facility did not returned to compliance yet; just minor/moderate violations.

Regards,



Norva Blandin, MSEM

Environmental Specialist III - Compliance Assurance

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Hazardous Waste Program

CASE REVIEW FORM

Check Case Review Type: <input type="checkbox"/> Case Specific Classification Review <input type="checkbox"/> Enforcement Case Review					
Current Date:		Inspection Date:		Inspector:	
EPA ID: _____ Facility Name: _____ Facility Address: _____ Reference Links: _____					
Alleged Violation Citation/Regulator Reference		Manual Guide	Potential for Harm	Extent of Deviation	Check All That Apply
1.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
2.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
3.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
4.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
5.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
6.					<input type="checkbox"/> Repeat Violations Actual or substantial exposure to HW constituents

Hazardous Waste Program CASE REVIEW FORM

Comments: (Optional)					
7.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
8.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
9.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					
10.					Repeat Violations Actual or substantial exposure to HW constituents
Comments: (Optional)					

DWM Notes:

Note: This staff assessment is preliminary and is designed to assist in the compliance review process, prior to final agency direction. Comments provided herein are not the final position of the Department and may be subject to revision, pursuant to additional information and/or further review.

Status	Regulation Description	Focus Area	Rule Cite	Harm & Potential for Harm	Extent of Deviation	Comments
		279.43(b) No guidelines				
Transporter	Training	62-710.600(2)(c)	Minor	Minor	SV (Compliance Assistance)	Maintain a record of training in the company's operating record and the individual personnel
UOT/UOP/UOB/UOTF/UOMK T	Record Keeping	279.46/ 279.56/ 279.65	ELRA NOV 403.121(4)(f)		SV (Compliance Assistance)	Used oil transporters/ processors/ burners must keep a record
UOT/UOP/UOB/UOTF/UOMK T	Record Keeping	62-710.510(1)	ELRA NOV 403.121(4)(f)		SV (Compliance Assistance)	Each registered person shall maintain records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the

FACILITY NAME: Havana Waste Oil Service Date: 2/23/17

EPA ID No.: FLR000218925 Case #:

	Violation	Description	Nature of Waste	Amount of Waste	Discharge

Nature of Waste

High Hazard (acutely toxic or reactive)

Other HW

Used Oil

Used Oil Filters

Amount of Waste

> 5,000 kg (25 drums) of Waste

1,000 to 5,000 kg (5 to 25 drums) of Waste

25 gal to 1,000 kg (5 drums)

<25 gal of Waste

Discharge

Discharge to surface water or off site discharge.

Discharge to ground water

Discharge to soil or air

Discharge to Impervious Surface/Containment

Discharge-de minimus cleanup per 62-780 FAC

No Discharge

Potential Exposures

>1,000 people

101 - 1,000 people

10 - 100 people

<10 people

Additional Threat Factors (select all that apply for specific violation-Use If no discharge observed)

Fire or Explosion Risk

Incompatible Waste Storage

Risk of Employee Exposure above PELs

Container Integrity

Inadequate Provisions for Detecting and Preventing Releases

Length of Time Violations Continue (>180 days over accumulation time)

Chronic or Recalcitrant Violator

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SUBSTANTIAL (Major)	Above 20
SIGNIFICANT (Moderate)	13-20
MINIMAL (Minor)	Under 13

[illegible]