



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

FACILITY INFORMATION:

Facility Name: January Environmental Services Inc
On-Site Inspection Start Date: 05/23/2017 **On-Site Inspection End Date:** 05/31/2017
ME ID#: 46304 **EPA ID#:** FLD982162943
Facility Street Address: 1920 Hwy 60 W Main St, Bartow, FL 33830-0000
Contact Mailing Address: 1920 Highway 60 West, Bartow, FL 33830
County Name: POLK **Contact Phone:** (863) 534-8478

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Other Participants: Elizabeth Knauss, Environmental Consultant; Shannon Kennedy, Environmental Specialist II; Cruz Torres, Driver; Loren January, Secretary

LATITUDE / LONGITUDE: Lat 27° 53' 51.5901" / Long 81° 51' 47.2672"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

January Environmental Services (January) was inspected to determine the facility's compliance with used oil transporter and transfer facility rules. The facility was originally notified as a small quantity generator on March 25, 1988, under the name Ashland Chemical Company. The 5.18-acre property was sold to January Environmental on October 20, 2004 and the notification was changed to Used Oil Transporter, Transfer Facility, Marketer and Filter Transporter. The company obtained a used oil processor permit (307171-HO-001) on April 16, 2012 due to problems related to storing collected oil more than 35 days. The permit expired April 16, 2017, and January failed to timely file an application to renew the permit. The Department has conducted a number of Hazardous Waste inspections of this facility, most recently on February 20, 2015. Cruz Torres accompanied the inspectors during the facility inspection conducted on May 23, 2017. A follow-up visit was conducted on May 31, 2017; Loren January was available during the second site visit for the paperwork review and to answer additional questions.

Process Description:

January is a used oil, used oil filter and oily waste transporter and processor. The facility does not have full time office employees and there are currently two drivers that work out of this location. The facility picks up waste products from its customers, consolidates and stores the waste and arranges for final treatment and disposal. January does not accept used oil or oily water from other transporters, except for one company that was required to notify as a transporter as it transports more than 55 gallons of self-generated oil at a time. The facility does not collect public used oil.

During the last inspection of the facility conducted on February 20, 2015, it was discovered that January was processing used oil through the use of a centrifuge and a vibratory screen filter. As this was not authorized in the permit, January was required to submit an application for a major permit modification. Submittals were received on October 15, 2015, November 12, 2015 and November 17, 2015. The major permit modification was approved by the Department on February 11, 2016. The facility was required to submit an application for

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permit renewal by February 16, 2017; however, the application was not received until April 13, 2017. The Department issued a Request for Additional Information (RAI) on April 21, 2017; a response was due by May 22, 2017; however, an extension was granted until July 3, 2017.

The facility is no longer processing the used oil it receives from customers and has not been for the past several months. During this inspection, the centrifuge had been removed from the treatment system and per Mr. Torres, will be sent to January's Oklahoma facility.

At the time of this inspection, two of the company vehicle operating out of this location were present onsite. A Wastewater Truck was located next to the building. Used Oil Truck #15, which was empty at the time of the inspection, was located at the rail car loading rack. Per Mr. Torres, January uses TIF XL-1A meters to screen used oil for halogen content prior to accepting the used oil from their customers. At the time of the inspection, neither a TIF instrument nor a Dexsil Test Kit was present in Used Oil Truck #15.

In addition to Used Oil Truck #15, one rail car was located at the loading rack. A track pan is located under the rail car loading area. The facility is not currently receiving or shipping used oil via rail. The rail car contained used oil solids as the liquids from this vessel had been placed into Tanker Trailer T-43. January is in the process of getting the solids removed from this railcar. The railcar will be re-certified and will then be sent to January's facility in Oklahoma. A second railcar, which was empty, was sent to January's Oklahoma facility within the past few months.

The facility is currently using six white 24,000-gallon aboveground storage tanks (ASTs) to store used oil. These ASTs are registered with the Department's Storage Tank Program, facility ID # 53/ 9101026. According to the electronic gauge, tank 101 contained 7,741-gallons of liquid, tank 102 contained 22,898-gallons of liquid, tank 103 contained 10,480-gallons of liquid, tank 104 contained 2,566-gallons of liquid, tank 105 contained 1,700-gallons of liquid, and tank 106 contained 22,694-gallons of liquid at the time of the inspection. A green AST has been installed in a separate containment area attached to the existing containment; at the time of the inspection this tank was empty. A second empty green AST and another silver AST were observed laying on their sides in the yard, both are empty. Please note that if any of these ASTs is to be used to store regulated materials they must comply with all regulatory requirements. Regulated tanks are required to be registered 30 days prior to installation, or within 30 days of changing from a waste water or process tank to a regulated used oil storage tank. In addition, a permit modification may be needed if storage capacity is increased. At the time of the inspection the containment around the tank farm was in good repair, did not contain any free liquids, and appeared to be adequate to contain the volume of the tanks.

Three tanker trailers were present at the facility at the time of the inspection. Tankers T-45 and T-120 were both empty. Tanker T-43 contained approximately 5,000-gallons of poor quality oil (high in both sediment and water content) from the railcar. Secondary containment was not provided for Tanker T-43.

Six used oil bins, all empty, were stored in the yard between Tankers T-43 and T-45. Two roll-off containers were located in the yard. The roll-off immediately north of Tanker T-43 contained solids collected from the used oil operations. The last shipment of solids to the landfill in Okeechobee took place in August of 2015. The analytical analysis from the August 2015 shipment, which did not include TCLP for volatiles, documents that the material was not characteristically toxic for any RCRA metals. The second roll-off contained solid waste from the facility: buckets, soil and plant debris.

A number of containers of oily water, used oil and used oil filters were observed in the building. According to Ms. January, some of their clients collect these wastes in drums which are brought back to the facility. Used oil will be pumped out of the drums to the used oil tanks, PCW will be routed to Aqua Clean and used oil filter will be collected until there are enough for a shipment.

Paperwork review included looking at incoming and outgoing bills of lading for 2015 through 2017. All outgoing shipments of used oil are going to Aaron Oil, Saraland, Alabama (EPA ID #ALD983180233). EPA identification numbers of the oil provider or designated facility were typically included on the bill of lading. Used oil filters are being sent to US Foundry in Miami.

Four drivers have worked at this facility in 2015, 2016 and 2017: Leandro Torres, Cruz Torres, Socrates Torres and Lynn Harris. Training records have not been provided as requested during the records review. No verification of training was provided for 2016 or 2017. Daily inspections were present for days when the facility is open and monthly storage tank inspection records are maintained.

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New Potential Violations and Areas of Concern:

Violations

Type: Violation
 Rule: **62-710.800(4)**
 Explanation: The permit expired April 16, 2017, and January failed to timely file an application to renew the permit
 Corrective Action: Ensure that all required submittals are made to properly renew the permit.

Type: Violation
 Rule: **62-710.600(2)(c)**
 Explanation: No verification of employee training was provided for 2016 or 2017.
 Corrective Action: Immediately provide documentation that the required training has occurred or immediately provide the required training if it has not occurred and provide the documentation to the Department.

Type: Violation
 Rule: **279.54(c)**
 Explanation: Secondary containment was not provided for the trailer storing used oil.
 Corrective Action: Immediately provide secondary containment for this trailer or remove the oil to a container which has secondary containment.

Photo Attachments:

Tanker T-45 and T-43 are stored in the paved part of the yard.

Stormwater drain next to Trailer T-43 which contains used oil.



Type: Violation
 Rule: **403.161(1)(b)**
 Explanation: Neither a halogen monitoring device or test kit was present in the Used Oil Truck #15.
 Corrective Action: Ensure that all used oil trucks are provided with a halogen monitoring device or test kit.

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Conclusion:

The facility is not in compliance with state and federal hazardous waste regulations at the time of the inspection.

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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	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	✓		

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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.

Leslie Pedigo
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE

Leslie Pedigo
PRINCIPAL INSPECTOR SIGNATURE

DEP
ORGANIZATION 07/18/2017
DATE

Elizabeth Knauss
Inspector NAME

Environmental Consultant
Inspector TITLE

FDEP/SWD
ORGANIZATION

Shannon Kennedy
Inspector NAME

Environmental Specialist II
Inspector TITLE

DEP/SWD
ORGANIZATION

Cruz Torres
Representative NAME

Driver
Representative TITLE

January Environmental Services, Inc.
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.

Loren January
Representative NAME

Secretary
Representative TITLE

January Environmental Services, Inc.
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: Shannon Kennedy

Inspection Approval Date: 07/18/2017