



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

FACILITY INFORMATION:

Facility Name: Fuels Unlimited Inc

On-Site Inspection Start Date: 11/16/2017

On-Site Inspection End Date: 11/16/2017

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:

Non-Handler

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Michael Eckoff, 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 November 16, 2017, John White and Michael Eckoff, Florida Department of Environmental Protection (FDEP), conducted an inspection of 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, 2018.

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 #266845-003-HO on September 29, 2017, which expires on March 26, 2022.

Fuels Unlimited has operated at this location since 2005 and is currently running three pump trucks. The facility has three 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 June 9, 2016, and was in compliance at that time.

Fuels Unlimited was 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.

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. An outside laboratory, American Testing Technologies, Inc., located in Akron, Ohio, is used to analyze oil marketed to burners.

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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.

INSPECTION NARRATIVE

Used oil is off-loaded from trucks in a curbed 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.

Used oil picked up by drivers is field tested for halogen content prior to transport. A halogen sniffer is used to determine if the halogen content is greater than 1,000 ppm. If the sniffer registers a positive result, the oil is tested using a Dexsil Halogen test kit. The result of the Dexsil test will be recorded on the driver's shipping paper. Incoming tanker loads of used oil are field tested for halogen content prior to acceptance. Drop tickets are maintained that show each used oil load delivered by drivers. The documents include the date and total gallons received. Upon receipt at the facility, used oil is off-loaded into one of several used oil tanks. Typically, this will be either tank 2 or tank 6 for on-specification oil while tank 1 is used for storage of off-specification used oil. Used oil from on-specification tanks is then transferred to a separate storage tank and sampled. When the tank is sampled it is locked-out so no further oil is added. Upon receipt of the oil analysis documenting the oil meets the specification (on-spec) in 40 CFR 279.11, the tank contents are determined to be on-specification oil. The on-spec oil is transferred to a storage tank for marketing as on-spec fuel. Additional oil will be added to the on-spec oil tank if it is accompanied by analytical results documenting it is on-specification. The on-spec oil is shipped to burners along with a copy of the oil analysis. The volume of oil moved into, and out of, the on-spec oil storage tanks is measured and tracked in a log.

All tanks within the tank farm are provided with secondary containment in the form of a concrete containment structure. The secondary containment area was clean, sealed, and appeared to be in good condition.

Used oil filters are stored within a storage container located on the property. Used oil filters are shipped to a foundry for reclamation and reuse of metals. No oil filters were on-site at the time of this inspection.

Vehicles are serviced off-site by Adkins Trucking.

The certificate of liability insurance for a used oil handler was received by the Department on June 29, 2017. No issues were noted.

Review of shipping papers for on-specification fuel were reviewed and no issues were noted. Burners receiving on-specification used oil from Fuels Unlimited include: Baldwin Paving Co #6, Newnan, Georgia; Noble Oil Services, Sanford, North Carolina; Triumvirate, Davie, Florida, and VA Paving, Cocoa, Florida.

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. Used oil is also accepted from All American Used Oil, White Oak, Georgia, and SC Waste Management, Greer, South Carolina.

Conclusion:

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

John E. White

Principal Inspector Name

Inspector

Principal Inspector Title

JW

Principal Inspector Signature

DEP

Organization

12/15/2017

Date

Michael Eckoff

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:

12/18/2017