From:	Fisch, Ben
To:	Bayly, Karen
Cc:	Barrett, Zachary; Ashwood, Janet; Perrigan, Glen; Bahr, Tim; Walker, Kim (Waste)
Subject:	RE: Case Review Speedy Oil Environmental FLR000226332
Date:	Wednesday, May 30, 2018 7:27:29 AM
Attachments:	Draft Case Review 5-15-18.pdf inspection report 2-13-2018.pdf image002.png

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Karen,

The Division conducted a Case Specific Classification Review for Speedy Oil Environmental FLR000226332. At this time, the Division concurs with the District that formal enforcement is appropriate. Please contact me if you have questions or comments and I hope you have a great vacation.

Thank you, Ben

Ben Fisch
Environmental Consultant
Waste Compliance Assistance Program
2600 Blair Stone Road, MS4560
Tallahassee, FL 32399-2400
Ben.Fisch@dep.state.fl.us
850-245-8782

From: Perrigan, Glen
Sent: Wednesday, May 16, 2018 7:57 AM
To: Fisch, Ben <Ben.Fisch@dep.state.fl.us>
Cc: Barrett, Zachary <Zachary.Barrett@dep.state.fl.us>; Ashwood, Janet <Janet.Ashwood@dep.state.fl.us>; Bayly, Karen <Karen.Bayly@dep.state.fl.us>
Subject: FW: Case Review Speedy Oil Environmental FLR000226332

Ben
Please followup with a case review.

Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program
2600 Blair Stone Road, MS4560
Tallahassee, FL 32399-2400
glen.perrigan@dep.state.fl.us
850-245-8749

From: Bayly, Karen
Sent: Tuesday, May 15, 2018 8:17 AM
To: Perrigan, Glen <Glen.Perrigan@dep.state.fl.us>
Cc: Barrett, Zachary <Zachary.Barrett@dep.state.fl.us>; Fisch, Ben <Ben.Fisch@dep.state.fl.us>
Subject: Case Review Speedy Oil Environmental FLR000226332

Glen – below is a draft inspection report, case review form, warning letter and penalty computation worksheet for your review. This is the first FDEP hazardous waste inspection conducted at this facility. There was no evidence of discharge or harm to the environment resulting from the violations.

file://floridadep/data/SD/ALL_Common/Sites/Lee/HW/FLR000226332%20-%20Speedy%20Oil%20Environmental/Draft%20Case%20Review%205-15-18.pdf
file://floridadep/data/SD/ALL_Common/Sites/Lee/HW/FLR000226332%20-%20Speedy%20Oil%20Environmental/inspection%20report%202-13-2018.pdf
file://floridadep/data/SD/ALL_Common/Sites/Lee/HW/FLR000226332%20-%20Speedy%20Oil%20Environmental/Speedy%20WL%205-14-18.docx
file://floridadep/data/SD/ALL_Common/Sites/Lee/HW/FLR000226332%20-%20Speedy%20Oil%20Environmental/Draft%20Penalty%20Computation%20Worksheet.docx

The used oil storage tank concrete secondary containment structure had numerous cracks in the floor and walls; and the impervious sealant was worn off the floor and walls. The drain/file valve was not situated completely within the secondary containment structure. Edison Oil Company took immediate corrective actions and repaired the cracks, applied new sealant and retrofitted the containment tray for the drain/fill valve.

A Dexsil Clor-d-Tect test kit retrieved from the used oil collection truck indicated it expired October 2012. The SOP and/or manufacturer's operating/maintenance manual for the Inficon Tek-Mate halogen sniffer was not available during the inspection and has not been provided. According to Mr. Snedegar, the instrument detects to 500 ppm and does not require calibrating/maintenance except for cleaning the tip. A review of the Tek-Mate Operating Manual DEP staff found on-line indicates the sensor needs to be replaced after 100 hours and should be calibrated annually.

Janet Ashwood, DEP Used Oil Coordinator, has attempted to contact Joe Snedegar by telephone and e-mail on 4-5-2018, 4-24-2018, 5-3-2018, 5-7-2018 and 5-9-2018 regarding the used oil handler activities associated with this facility. Joe Snedegar indicated that he submitted the registration documents to the DEP office in Tallahassee, twice; however, no proof of the submittals was provided. **To date, the Department has not received a completed registration package; and the facility continues to transport used oil and used oil filters; and operate a used oil transfer facility.**

Violations were characterized using the Guidelines for Characterizing Used Oil Violations 6-28-13; Excel spreadsheet 11-3-14; Hazardous Waste/Used Oil Harm and Potential for Harm Ranking System 3-10-17.

District recommends pursuing enforcement for failing to register/notify used oil/used oil filter

transporter and transfer facility with DEP; failing to maintain entire storage tank system within secondary containment and failing to maintain secondary containment system sufficiently impervious to used oil; and failing to determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.

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