

**MEETING AGENDA
JANUARY ENVIRONMENTAL SERVICES
HAZARDOUS WASTE ID FLD982162943
NPDES STORMWATER ID FLR05G778
MAY 24, 2018, 10:00 AM**

1. Introductions.

2. Chronology.

- 03/01/2018 Used Oil Transporter/Used Oil Filter registration for 2018-2019 due.
- 12/28/2018 NPDES Stormwater Permit #FLR05G778 expired.
- 03/01/2019 Used Oil Transporter/Used Oil Filter registration for 2019-2020 due.
- 03/08/2019 Routine Hazardous Waste Inspection and NPDES Stormwater Inspection site visit.
- 04/10/2019 NPDES Stormwater Compliance Assistance Offer Letter for the issued with the NPDES Stormwater inspection attached.
- 04/24/2019 Warning Letter #WL19-14SWD53SWD issued.

3. Hazardous Waste Program Non-compliance Issues.

- a) The facility has not completed their 2018-2019 Used Oil Transporter/Used Oil Filter registration which should have been submitted by March 1, 2018. Based on this, the Department issued a letter to January on August 23, 2018, notifying them that they were no longer authorized to transport, or market used oil, or used oil filters. Additionally, the 2019-2020 Used Oil Transporter/Used Oil Filter registration has not been submitted by March 1, 2019 as required.
62-710.500(2) and 62-710.600(2), F.A.C.
- b) The Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2018, for 2017; nor has the Annual Report by Used Oil and Used Filter Handlers was not submitted by March 1, 2019, for 2018.
62-710.510(5), F.A.C.
- c) Records of driver training for 2017, 2018, or 2019 were not available on site.
62-710.600(2)(c), F.A.C.
- d) Two 55-gallon metal drums labelled “waste oil were observed inside the warehouse. Containers and tanks used to store used oil must be clearly labeled with the words “used oil.” Immediately relabel the drums as “used oil.” Any mislabeled drums picked up from customers must be properly labeled when they arrive on-site.
40 CFR 279.54(f)

4. Hazardous Waste Program Corrective Actions.

- a) The 2019-2020 Used Oil Transporter, Transfer Facility, Processor, Filter Transporter, and Filter Transfer Facility and Used Oil Filter registration was issued on May 7, 2019. Please ensure that all future registrations are made by March 1 of each year.

- b) The 2017 Annual Report by Used Oil and Used Filter Handlers was submitted on April 17, 2019 and the 2018 Annual Report by Used Oil and Used Filter Handlers was submitted on April 30, 2019. Please ensure that all future Annual Report by Used Oil and Used Filter Handlers are submitted by March 1 of the following year.
- c) Immediately provide the 2017, 2018, and 2019 (if due at this time) driver training records to the Department for review.
- d) Provide documentation that the drums labeled “waste oil” have been properly re-labeled. Moving forward, any mislabeled drums picked up from customers must be properly labeled when they arrive on-site.

5. Settlement of Department Enforcement Action for the Hazardous Waste Program.

Discussion of Consent Order.
Discussion of penalties and costs.

6. NPDES Stormwater Program Non-compliance Issues.

- a) Permit FLR05G778 expired on 12/28/2018.
- b) The SWPPP was missing required information as outlined in the SWPPP Checklist Section of the inspection.
- c) The facility was not conducting Quarterly Visual Monitoring.
- d) The facility was not conducting Quarterly Facility Inspection.

7. NPDES Stormwater Program Corrective Actions.

- a) Per Mrs. Dorwart, she is working with Victoria Robinson, NPDES Stormwater, Tallahassee to renew coverage. Please make sure to update the address to 1920 Highway 60 West, Bartow, Florida. Please provide an update.
- b) The updated SWPPP needs to be provided to the Department.
- c) The facility needs to immediately initiate Quarterly Visual Monitoring; the initial quarterly monitoring result should be provided to the Department
- d) The facility needs to immediately initiate Quarterly Facility Inspection; the initial quarterly inspection should be provided to the Department.

8. Conclusions.

S: Shannon, R: Ramandeep, L: Leslie, N: Lauren

Meeting Notes

Introductions made

Agendas distributed

Leslie: Made a chronology for the site to follow along, violations (corrected and not), and agenda.

Registration for 2018-2019 year (Has been done) must be done by May.

N: Issues with Janet Ashwood, miscommunications on what is due and not.

L: Were without registration for a year, 2018-2019 year missing. So, while you are good now, technically didn't have valid registration for that year.

N: sent back very specifics for insurance, going back and forth with insurance company on what documents to use. Wanted a wet copy of it and not an email copy, miscommunications made. Hopefully it is all insured now.

S: If paperwork is due March 1, Tally will send out an email notification that registration is needed 60 days ahead.

N: Let me see if there is a better email we can use, get too many emails a day and get lost.

L: Specific email heading to go into specific email inbox to not lose the email.

L: NPDES and stormwater permits, send out emails too, said you were working on it and it has yet to be updated?

N: It has been faxed in, not sure what date it was faxed

R: Leslie was out for inspection in March, permit was expired, and you were working with Victoria because you received a notification of registration?

N: Stormwater is different, our outfall doesn't go into a lake. Registration kicking back because it wanted an outfall location. Water goes into retention pond (rainwater).

L: Peace river and unidentified waters, if ditch overflows is where the water would run.

R: You started working with Victoria in December?

N: Was aware of permit lapse when started working with Leslie, then I took over from permitting guy.

L: Went over violations for HW

R: Have driver training records 2018, 2019.

R: Had guys correct the labeling from "waste oil"

L: Make drivers aware that if it's not properly labeled to have it changed or don't accept it.

S: Will give you stickers and stencils for future.

Leslie: In compliance with HW

L: Went over NPDES violations

L: End of next week (May 31) for updates on violations and the corrective actions taken.

R: We will check with Tally that fax has been received, if anything additional is needed we will let you know.

L: Have address changed, so both addresses are the same. Will talk with Victoria about it. Where are you with correcting the stormwater plan.

N: Sent it to Tally.

L: Send it to me instead. Compliance is run out of our office. Have you started quarterly visual monitoring and inspections?

N: Need help, where does monitoring need to occur?

L: Wherever water is going offsite. Two places: outflow to that pond and front of property outfall. When you have a qualifying storm event (1/2 in of rain) that's when you check. Submit a piece of paper with no discharge this quarter.

R&L: Explained quarterly visual monitoring process.

L: Statement saying moving forward what we will be doing for quarterly visual monitoring. Provide some training for drivers in case it is raining when they are there. Create a form for the monitoring that works for your site (i.e. areas where it might outflow). You can send me the form for review.

N: When I was looking through the stormwater, need to know the amount of rain?

L: Suggest using the weather station, or buying a rain measurer

R: Do you have a consultant? (No) facilities responsibility to maintain SWPPP. ACSCE similar inspection but it's done once a year. If you can conduct one and submit it to Leslie for corrective actions.

L: Annual certification that your plan is working. EPA has guidance for the form.

R: Send us everything and we can return to compliance. What is the timeframe that you need to complete the actions?

L: One week or two weeks? **June 7 (2 weeks from meeting date)**

R: Will check with Tally for faxed documents.

L: Penalties for HW. Driver training can be taken off because copies were provided. Labels were done right away. So just the other two violations and department costs. Provide the pictures and we can go through with a SFCO. Will be sent to Senior and add you on there.

N: Will send all the information in within the next two weeks.

R: Please continue to maintain records for future inspections.

S: *Went over DEP and facility actions needed.*

Adjournment