



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Southeast District Office
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
561-681-6600

January 29, 2020

Blanca R. Rojas, President
ECO Services DBR
1901 NW 22nd St
Pompano Beach, Florida 33069
rocio@ecodbr.com

Re: ECO Services DBR – Return to Compliance Letter
EPA ID # FLR000229435
Broward County

Dear Ms. Rojas:

Department personnel conducted an inspection of the above-referenced facility on November 6, 2019. Based on the information provided during and following the inspection, the facility was determined to be out of compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Justin Stark at 561-681-6648 or via e-mail at Justin.Stark@FloridaDEP.gov.

Sincerely,

A handwritten signature in blue ink, appearing to be "NB", written over a light blue circular stamp.

Norva Blandin, MSEM
Environmental Administrator
Southeast District

Enclosure: [Hazardous Waste Program Final Inspection Report](#)

cc: Justin Stark, Norva Blandin – FDEP SED
David Bautista, ECO Services DBR – david@ecodbr.com



Florida Department of
Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: ECO Services DBR Inc
On-Site Inspection Start Date: 11/06/2019 **On-Site Inspection End Date:** 11/06/2019
ME ID#: 131729 **EPA ID#:** FLR000229435
Facility Street Address: 1901 NW 22nd St, Pompano Beach, Florida 33069-1315
Contact Mailing Address: 1901 NW 22nd St, Pompano Beach, Florida 33069-1315
County Name: Broward **Contact Phone:** Data is missing from FIESTA

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Used Oil:** On-Spec, Transporter, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Justin Stark, Inspector
Carlos Grajeda, Environmental Specialist II; David Bautista, Vice President; Blanca R.
Other Participants: Rojas, President

LATITUDE / LONGITUDE: Lat 26° 15' 27.882" / Long 80° 8' 59.118"

NAIC: 531312 - Nonresidential Property Managers

TYPE OF OWNERSHIP: Private

Introduction:

On November 6, 2019, Justin Stark with the Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) at ECO Services DBR Inc. (hereinafter ECO or facility), located at 1901 NW 22nd St., Pompano Beach, Florida 33069. ECO was inspected to determine the facility's compliance with the state and Federal hazardous waste and used oil transporter regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, and 279, adopted and incorporated by reference in Rule 62-710.210(2), Florida Administrative Code (F.A.C.), and 62-730.160(1) F.A.C. The inspector was accompanied by Carlos Grajeda from FDEP.

The inspectors were escorted around the facility by Blanca R. Rojas, President and David Bautista, Vice-President. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection. ECO occupies 4,301 square feet and is connected to municipal water and sewer. ECO has been operating at this location since 11/01/2018 and employs two staff. The facility operates Monday through Friday from 9 a.m. to 6 p.m., and Saturday through Sunday from 8 a.m. to 12 p.m.

NOTIFICATION HISTORY:

ECO initially notified with the Department as a Used Oil and Used Oil Filter Transporter for the 2020 year on 2/18/2019. The facility was assigned the EPA Identification Number (EPAID) FLR000229435. ECO moved to this location on 11/01/2018 from 3923 S State Road 7, Davie, FL 33314. The assigned EPAID number for this location was FLR000197939.

INSPECTION HISTORY:

The facility has not been inspected at this location by FDEP. The previous location was inspected by FDEP on 10/27/2016 as a used oil transporter and was found to be out of compliance at the time of the inspection for failure to clean up de minimis used oil discharges, operating as a used oil filter transfer facility without proper

ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

registration, and failure to label 10 55-gallon drums of used oil filters. The case was resolved without formal enforcement action.

Process Description:

ECO primarily operates as a used oil and used oil filter transporter. The facility also performs cleaning of storm sewer systems. The facility consists of Office Spaces, Warehouse, and a Backyard, where the facility stores its fleet vehicles. ECO does not manage or transport any hazardous waste.

Office Spaces:

This area is located on the north side of the facility and is where Administrative tasks are completed. Wastes are not generated in this area.

Warehouse:

This area is located on the west side of the facility and is used for storage. The facility keeps one 150-gallon plastic container of used oil for maintenance on its fleet vehicles. The container was labeled with the words "Used Oil," closed, and within secondary containment, as required by 40 CFR 279.22(c)(1) and 62-710.401(6) F.A.C.

The inspectors also observed 25 empty 55-gallon metal drums in this area. ECO will provide customers with a new drum following pickup of full used oil containers.

Backyard:

This area is located on the western side of the facility, adjacent to the warehouse. This area is comprised of soil that is not covered by an impervious surface. The facility maintains a fleet of five vehicles that includes three vacuum trucks and two sewer cleaning trucks. Each truck can hold approximately 3,000 gallons. All trucks are equipped with spill kits for used oil. The facility also displays its used oil transportation registration on each of its vehicles as required by Rule 62-710.500(4) F.A.C. and is valid until 6/30/2020.

In this area, the inspectors observed de minimis discharges of used oil into the soil. According to Rule 62-780.560(1), F.A.C., a "petroleum or petroleum product de minimis discharge" means a discharge of petroleum or petroleum products of less than 25 gallons onto a pervious surface. The facility indicated that the discharge had occurred from a leak in one of the fleet vehicles. The inspectors advised ECO that, upon detection of a used oil spill or leak, the spill must be stopped, contained, and properly cleaned up, as required by Rule 62-780.560(1), F.A.C.

Records Review:

Used oil and used oil filter shipment records for the last three years were available for review. The inspectors reviewed the following:

>Used Oil Acceptance and Delivery Records - All used oil and used oil filter are sent to Triumvirate Environmental (EPA ID FLD981018773). Triumvirate Environmental is operating with a valid permit (Permit No. 77390-011HO, expires 11/19/2022) and is authorized to process used oil. During the inspection, ECO was observed to be using a non-hazardous waste manifest for used oil shipments. ECO has been using the waste description "Non-hazardous Waste Oil." According to EPA, the term "used oil" is a precise regulatory term with defined requirements in 40 CFR 279, whereas "waste oil" is generic terminology for oil that has been contaminated with substances that may or may not be hazardous. It is recommended that ECO use the term "Used Oil" on all future shipments to demonstrate that the used oil does not meet the definition of a hazardous waste described in 40 CFR 261.3.

>Employee Training Records - All employees receive initial and annual training on the proper management of used oil, including handling, storage, and spill response and cleanup. The facility provided records of its recent training which was conducted on 12/19/2018. Pursuant to Rule 62-710.600(2)(c) F.A.C., a used oil transporter shall ensure that it is familiar with applicable Florida and federal laws and rules governing used oil transportation and has an annual and new employee training program in place covering the applicable rules. The facility was advised to conduct its 2019 used oil training by the end of the calendar year and to provide proof of this. Lastly, the facility maintains these records on-site for 3 years in accordance with 62-710.600(2)(b) F.A.C.

>Rebuttable Presumption Records - The facility tests each used oil shipment to ensure that the total halogen

ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

content of the used oil being transported is below 1,000 parts per million (ppm), pursuant to 40 CFR 279.44(a). The facility uses a Clor-D-Tect 1000 Chlorine Halogen Test Kit manufactured by Dexsil Corporation for halogen testing. ECO will reject the shipment if the used oil halogen testing exceeds 1,000 ppm. Halogen testing records are kept on-site for at least three years, in accordance with 40 CFR 279.44(d), and can be found with the facility's Used Oil Acceptance and Delivery Records.

>Proof of Liability Insurance - Records of the facility's Used Oil Handler Certification of Liability Insurance forms from the last three years were available for review. ECO was able to provide proof of pollution liability insurance, issued by Northern Insurance Group (Policy No. 793-00-89-12-0000, expires 02/04/2020) in the amount of \$1 million. The facility also provided proof of automobile liability insurance, issued by Northern Insurance Group (Policy No. 793-00-89-14-0000, expires 02/04/2020) in the amount of \$1 million. It was confirmed that ECO has not had a lapse any in any of their liability insurance policies as required by 62-710.600(2)(e) F.A.C.

>Annual Report for Used Oil and Used Oil Filter Activities - Annual reports for the last three years were available for review during the inspection. Since the facility changed locations in 2018, the previous reports were applicable to the FLR000197939 facility. The 2019 Annual Report by Used Oil and Used Oil Filter Handlers for the FLR000229435 facility will be due by 03/01/2020, pursuant to Rule 62-710.510(5) F.A.C.

Based on the records review, ECO does not hold used oil or used oil filters for longer than 24 hours, demonstrating that the facility does not operate as a used oil and used oil filter transfer facility.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-780.560(1)
Explanation:	ECO failed to adequately respond to a de minimis spill of used oil from one of the fleet vehicles located in the Backyard area of the facility.
Corrective Action:	Please adequately respond to the de minimis used oil spill from the fleet vehicle and provide documentation to the Department demonstrating proper clean up. For future discharges, ECO shall, upon detection of a used oil spill or leak, ensure the spill is stopped, contained, and properly cleaned up.

Comments:

The facility corrected this violation on 11/08/2019 based on the photos and manifest records provided via email.

Photo Attachments:

Before



After



ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

55-gallon Drum Used to Clean Up Contaminated Soil with Used Oil



Manifest Showing Disposal of Contaminated Soil with Used Oil

HAZARDOUS WASTE	Quantity	Weight	Volume
NON HAZARDOUS WASTE OIL			
NON HAZARDOUS USED FILTERS	29	20	440
NON HAZARDOUS OILY WATER			
OTHER Contaminated Soil	2	DM	50

PHOTO ATTACHMENTS:

Spill Kits



Collection Truck

De Minimis Used Oil Spill



Back of Collection Truck



Conclusion:



ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

ECO was inspected as a used oil and used oil filter transporter and was found to be out compliance at the time of inspection for: inadequately responding to a de minimis used oil discharge from one of the fleet vehicles in the Backyard area.

Compliance assistance was provided to the facility both during the inspection and in the exit interview sent via email on 11/06/2019. The inspector also provided the FDEP Used Oil Transporter and Transfer facility presentation. The facility was given 14 days to return compliance.

The facility provided photos and manifest records demonstration that a proper response to the de minimis used oil discharge was completed on 11/08/2019. The facility has since returned to compliance.

ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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	✓		

ECO Services DBR Inc Inspection Report

Inspection Date: 11/06/2019

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

Justin Stark	Environmental Specialists II	
Principal Investigator Name	Principal Investigator Title	
_____	DEP	12/30/2020
Principal Investigator Signature	Organization	Date
_____	_____	_____
Carlos Grajeda	Environmental Specialist II	
Inspector Name	Inspector Title	
_____	DEP	
_____	Organization	
_____	_____	_____
David Bautista	Vice President	
Representative Name	Representative Title	
_____	ECO Services DBR 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.

Blanca R. Rojas	President	
Representative Name	Representative Title	
_____	ECO Services DBR 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: Norva Blandin	Inspection Approval Date: 12/30/2020
_____	_____