



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

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**FACILITY INFORMATION:**

**Facility Name:** Aqua Clean Environmental Company LLC  
**On-Site Inspection Start Date:** 06/22/2021 **On-Site Inspection End Date:** 06/22/2021  
**ME ID#:** 21896 **EPA ID#:** FLR000034033  
**Facility Street Address:** 3210 Whitten Rd, Lakeland, Florida 33811-1086  
**Contact Mailing Address:** 3210 Whitten Rd, Lakeland, Florida 33811-1086  
**County Name:** Polk **Contact Phone:** (863) 644-0665

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Used Oil:** Oil Filters, Processor **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for Used Oil Transfer Facility Facility  
Routine Inspection for Used Oil Processor Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Shannon Lenhart, Inspector  
Leslie Pedigo, Environmental Consultant; Megan Skeen, Environmental Compliance  
**Other Participants:** Manager; Brad Thomason, Plant Manager

**LATITUDE / LONGITUDE:** Lat 28° 0' 18.6604" / Long 82° 2' 33.4423"

**NAIC:** 562111 - Solid Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Aqua Clean Environmental Company, LLC ("ACE") was inspected by the Florida Department of Environmental Protection ("Department") on June 22, 2021, to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility was last inspected on December 2, 2019. Megan Skeen, Environmental Compliance Manager, and Brad Thomason, Plant Manager, assisted the inspectors during the inspection. Formerly, ACE and Florida Recycling Solutions, LLC. ("FRS") were sister corporations that shared the facility and EPA Identification Number (EPA ID No. FLR000034033). However, on May 6, 2021, FRS underwent a facility and permittee ownership change and is now Aqua Clean Environmental Company, LLC. ACE is a permitted used oil processor and receives used oil transported by ACE. ACE is also permitted to process oil contaminated debris. ACE is a registered transporter of used oil, used oil filters, and petroleum contact water ("PCW") as well as a used oil/used oil filter transfer facility. ACE also operates a Centralized Waste Pretreatment facility at this location that discharges to the City of Lakeland sewer system. The facility permit, 294693-006-HO and 294693-007-SO was issued May 28, 2020 and expires May 12, 2025. The permit modification associated with the ownership change went into effect on May 6, 2021.

The facility currently has about 46 employees, 30 of which are drivers. The facility has water and sewer service provided by the City of Lakeland, but occasionally uses the City of Tampa Publicly Owned Treatment Works ("POTW") when their wastewater is high in conductivity.

Inspection Date: 06/22/2021

### Process Description:

ACE operations are discussed in detail in the facility's Used Oil and Material Processing Permit and in previous inspection reports. A walk through of the entire facility along with review of record keeping was performed during this inspection. Records included: the contingency plan and SPCC, training records, weekly tank system inspections, used oil acceptance and delivery records, Annual Used Oil Handler Reports, PCW acceptance records and final disposition receipts, waste profiles, waste analyses, wastewater transport records, manifests from oil contaminated debris sent to Cedar Trail Landfill, and the laboratory waste jug analysis report. The facility hired a new Facility Manager, Robert Shuler, on June 17, 2021, and a new Plant Manager, Brad Thomason, approximately two months prior to the inspection. All records appeared to be in order; however, the SPCC plan should be updated to reflect the new personnel, and the appropriate training for the new personnel should be completed as required.

During the walk through of the facility, it was noted that the grounds and stormwater ponds were all clean, and there was no indication of improper discharges (oil sheens, dead vegetation, etc.). There are a total of 17 Aboveground Storage Tanks ("ASTs") at the facility; ASTs 1 through 10 are located in the front tank farm, and ASTs 11 through 16 are located in the back tank farm. At the time of the inspection, Tank No. 9 was not in use. All tanks were properly labeled and within secondary containment. The Secondary Containment area is checked daily and pumped out if necessary, for example, following a rain event. Throughout the facility, there were fire extinguishers, which are serviced on an annual basis, along with a spill kits.

At the time of the inspection, one container of used oil filters was not properly labeled with the words "used oil filters." Corrective action was taken immediately during the inspection and the container was properly labeled with the words "used oil filters." All other containers were properly managed and labeled.

ACE has an in-house laboratory that conducts analysis on the facility's wastewater. Grab samples of used oil and wastewater are collected from incoming shipments and are tested for metals, Chemical Oxygen Demand ("COD"), conductivity, and flashpoint. A small amount of waste is generated from the Inductively Coupled Plasma ("ICP") emission spectrometer. The facility uses elementary neutralization on the waste prior to discharging it back into it's wastewater pretreatment system.

Universal waste lamps are changed on site and maintained within the conference room area prior to disposal. At the time of the inspection, universal waste lamps were located in an open, unlabeled container. Following the inspection on June 22, 2021, the facility provided photo documentation via email of the properly closed, labeled universal waste lamp container with an accumulation start date of May 2021.

### New Potential Violations and Areas of Concern:

#### Violations

Type:	Violation
Rule:	62-710.850(5)(a)
Explanation:	All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters." At the time of the inspection, one container of used oil filters was not properly labeled with the words "used oil filters."
Corrective Action:	CORRECTED: Corrective action was taken immediately during the inspection and the container was properly labeled with the words "used oil filters." All other containers were properly managed and labeled.

#### Photo Attachments:

Inspection Date: 06/22/2021

Used oil filter container not properly labeled



Properly labeled used oil filter container



Type:

Violation

Rule:

62-737.400(5)(a) , 62-737.400(5)(b)

Explanation:

(a) Spent universal waste lamps must be in closed containers. At the time of inspection, spent mercury-containing lamps were located in an open container. (b) Each lamp or container in which lamps are contained must be clearly labeled or marked with "universal waste lamps" or "waste lamps" or "used lamps." At the time of inspection, spent mercury-containing lamps were not placed in a properly closed and labeled container.

Corrective Action:

CORRECTED: On June 22, 2021, the facility provided photo documentation of the properly closed, labeled universal waste lamp container via email.

**Photo Attachments:**

Universal waste lamps not properly closed or labeled



Properly closed and labeled universal waste lamps

**Conclusion:**

At the time of the inspection minor violations were noted, however corrective actions were taken during and following the inspection and Aqua Clean Environmental Company, LLC is now operating in compliance with rules and regulations governing used oil processors, transporter, and transfer facilities, as well as universal waste regulations.

Inspection Date: 06/22/2021

**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	✓		

Inspection Date: 06/22/2021

**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

Shannon LenhartEnvironmental Specialist**Principal Investigator Name****Principal Investigator Title**FDEP-SWD07/13/2021**Principal Investigator Signature****Organization****Date**Leslie PedigoEnvironmental Consultant**Inspector Name****Inspector Title**FDEP-SWD**Organization**Megan SkeenEnvironmental Compliance Manager**Representative Name****Representative Title**Aqua Clean Environmental  
Company, LLC**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.

Brad ThomasonPlant Manager**Representative Name****Representative Title**Aqua Clean Environmental  
Company, LLC**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:** Michael C Lynch**Inspection Approval Date:**07/14/2021