

Oils Unlimited, January 5, 2000
Inspection Summary

Inspection participants:

Lu Burson, FDEP
Bill Kappler, FDEP
Bill Patterson, Oils Unlimited
Karen Violet, Oils Unlimited

The inspection at Oils Unlimited (OU) was initiated as a Compliance Assistance Site Visit (CASV) at the request of the facility. OU is a registered used oil/used oil filter Transporter, Transfer Facility, used oil filter processor, and Marketer of on-spec used oil fuel.

The facility no longer collects "street oil" but rather has narrowed its customer base to accept used oil from other transporters and a few select facilities. Facilities include FL Gas Transmission, Cape Canaveral Marine Services, Necessary Services, Jan's Oil, Pilot Oil, Central FL Used Oil Services, Petrotech, Amoco, Byrd Oil, and Atlantic Dry Dock. Oil is screened for halogens with a *Dexil* at the customer site and then the truck load is again screened using a *Dexil Q4000* test kit before off loading the used oil into tanks located at Byrd Oil on French Street in Sanford. OU has three trucks and two drivers for collection and delivery.

Used oil is off loaded after screening into a 17,000 gallon holding tank, tank #6. A sample is collected from Tank 6 every week and sent overnight to Necessary Oil in Bristol Tennessee for specification testing. Results are FAXED back to OU within 24 hours and on spec oil is off loaded into a separate storage tank, Tank #4, until sold. On spec oil is sold to Orlando Paving, Florida Power, International Paper, and Soil Treatment Services. Per Mr. Patterson, OU sold one million gallons of on spec used oil in 1999.

Individual loads accepted from other used oil transporters are not specification tested individually, only screened for halogens before offloading. The only specification testing performed by OU is from the holding tank once per week. If an individual truckload fails for halogens it is segregated into one of two 5000-gallon holding tanks until additional testing is performed. It is not offloaded directly into Tank 6.

One wastewater tank is on site for collection of water from secondary containment and non-hazardous wastewater. Industrial wastewater is shipped to *AquaClean*. *AquaClean* tests the waste to ensure it is non-hazardous but does not currently provide the analytical results to OU. OU needs to contact AquaClean to request a copy of their testing protocol and obtain results for each shipment to keep on file. OU questioned the need to provide analyticals for wastewater from secondary containment under the argument that it is exempted in the tanks rule. (?)

Laboratory test results were reviewed. OU needs to cross reference sample numbers to individual loads. It was also noted that while an area is available for reporting Flash Point on the data sheets, it was not being recorded. A negative number indicates results that were below detection limits on the report. OU needs to request that the lab report BDL instead of negative numbers to avoid confusion.

One of the laboratory reports indicated a halogen content greater than 1000 ppm but did not indicate what happened to the load. According to Mr. Patterson the high result was a load from Cape Canaveral Marine Services and was the result of saltwater intrusion. OU needs to do a better job of documenting resolution of high halogen results.

OU discontinued collecting used oil filters in 1998. All filter customers are referred to Necessary Services in Polk County. Contaminated absorbent is generated approximately once every two months. Waste absorbent is profiled and shipped to Ogden Martin for use as a fuel source.

OU needs to close out their old EPA identification number used at the Sanford Airport.

X

Oils Unlimited – Seminole County
January 5, 2000, 10:15 am

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David Patterson, Oils
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Business initially collected used oil from all types of industry. Facility has narrowed its customer base to a few facilities. They include Florida Gas and Transmission, Cape Canaveral Marine Services, Necessary Services, Jan's Oil, Pilot Oil, Petro Tech, Amoco, Byrd, and Atlantic Dry Dock. Oils screens the used oil to confirm it is on-spec oil by determining that it is not hazardous waste and that it meets on-spec standards.

Oils employs two drivers using three trucks that are constructed with isolated compartments.

Oils sells its on spec used oil to Orlando Paving Company, Florida Power, International Paper, and Soil Treatment Services. Mr. Patterson stated to inspectors that Oils sold 1-million gallons off on spec used oil in 1999.

Oils transports used oil collected from its customers in tanker trucks. The oil is initially tested at the customer site using Dexal field analysis prior to transporting the oil. Hot loads are left at the customer site. The oil is next transported to Oils facility at 509 French Street, Sanford, Florida. The facility has a total of five aboveground tanks at this location.

The used oil is next transferred to a 17,000-gallon aboveground tank. Used oil samples are pulled from the holding tank based on the mixing of several combined used oil loads. A sample is pulled every Monday in the week and analyzed for halogens, lead, chromium, cadmium, arsenic, nickel, and percent water. The oil is not analyzed for flash point.

Oils discontinued pick up and transport of used oil filters in 1998. Calls received for used oil filter pick up is referred to necessary Services.

Used Oil Tank Farm

The tank farm consists of one pump station and two 17,000-gallon aboveground holding tanks. The tanks are surrounded by a concrete containment system consisting of a concrete floor three to four foot high concrete walls. The containment system is dry. Tank 6 is used as the primary holding tank prior to sampling the used oil. After the used oil is sampled and determined as on spec based on laboratory analysis, the used oil is transferred to tank 4 for holding prior to offsite shipment.

Located in the rear of the tank farm are two 5,000-gallon aboveground tanks that Oils uses contingent they receive off-spec oil.

One additional 2000-gallon aboveground tank located next to the previously mentioned tanks is used for non-hazardous wastewater.

Contaminated absorbent is generated every two months. The waste absorbent is shipped to Ogden Martin as a fuel source.

Recommendation

A tracking system should be developed that links each laboratory analysis to its corresponding manifest shipment.