

FLORIDA DEPARTMENT OF Environmental Protection

South District PO Box 2549 Fort Myers FL 33902-2549 SouthDistrict@FloridaDEP.gov Ron DeSantis Governor

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

February 19, 2020

Cory Baxter, Owner Mobile Impact Services LLC 407 West Lake Drive Sarasota, Florida 34232 E-mail: <u>mobileimpactservices@gmail.com</u>

Re: Mobile Impact Services Facility ID Number: FLR000203158 Sarasota County

Dear Mr. Baxter:

Department personnel conducted a compliance inspection of the above-referenced facility on February 13, 2020. Based on the information provided during the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain these facilities in compliance with state and federal rules. Should you have any questions or comments, please contact Karen Bayly at (239) 344-5616, or via e-mail at Karen.Bayl@FloridaDEP.gov.

Sincerely,

teninfer L. Cargerten

Jennifer Carpenter Assistant Director South District Florida Department of Environmental Protection

Enclosure: Inspection Report



Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name:Mobile Impact Services LLCOn-Site Inspection Start Date:02/13/2020On-Site Inspection End Date:02/13/2020ME ID#:110098EPA ID#:Facility Street Address:407 W Lake Dr, Sarasota, Florida 34232-1948Contact Mailing Address:407 W Lake Drive, Sarasota, Florida 34232County Name:SarasotaContact Phone: (941) 952-8945

NOTIFIED AS: Non-Handler, Used Oil

WASTE ACTIVITIES: Generator: Non-Handler Used Oil: Transporter, Used Oil

INSPECTION TYPE: Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector:Karen R. Bayly, InspectorOther Participants:Cory Baxter, Owner

LATITUDE / LONGITUDE: Lat 27° 19' 57.668" / Long 82° 28' 47.6511"

811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic)

NAIC: Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

A compliance evaluation inspection was conducted by Florida Department of Environmental Protection (FDEP) hazardous waste staff at Mobile Impact Services (facility) on 02-13-2020 to verify the facility's compliance status with state and federal hazardous waste and used oil rules and regulations. The facility was previously inspected on 03-25-2015. The following is a summary of my observations.

Mobile Impact Services is registered as a used oil transporter (registration expiration is 06-30-2020) and a nonhandler of hazardous waste. The facility operates out of a garage at a residential property owned by Cory and Shona Baxter. According to the Florida Division of Corporations, Cory and Shona Baxter are the managing members of Mobile Impact Services LLC.

Process Description:

Mobile Impact Services conducts hydraulic cylinder repair/maintenance and on site hose repair. The majority of hydraulic cylinders are transported in tact (oil contained within the sealed cylinder) to the facility. Used hydraulic oil is drained and placed directly into a 150-gallon double-walled above ground storage tank maintained in the shed (see photo). The tank was properly labeled 'used oil'. A container of absorbent material and absorbent pads are maintained inside the shed to respond to spills.

Large hydraulic lifts are serviced in the field. Used hydraulic oil is drained, collected in closed/labeled 5-gallon plastic containers and transported back to the facility. Containers holding used oil are stored inside a metal 'job box' inside the bed of the truck, capable of containing releases (see photo). A log is maintained reflecting the facility always transports <55-gallons of used oil at one time; and <500-gallons of used oil annually over public highways and is therefore not subject to the Certification Program under Rule 62-710.600 Florida Administrative Code.

Mobile Impact Services LLC Inspection Report

Inspection Date: 02/13/2020

Disposal records reflect Cliff Berry Inc. picked up 120-gallons of used oil on 01-16-2019 and 150-gallons on 05-03-2018. Mr. Baxter verified the storage tank currently contains 104-gallons of used oil and soon due for pickup.

A 55-gallon drum of Brake Kleen was noted in the shed. According to the previous inspection report the product contains 2.5-10% methanol. Mr. Baxter indicated the material is transferred into smaller containers for usage. The material is used up when applying and no waste is generated from the use of the product.

A sink top parts washer with a 16-gallon drum base was noted outside (see photo). Mr. Baxter indicated the drum contains approximately 5-gallons of mineral spirits, is rarely used and he has not disposed of any spent solvent to date. It was recommended to maintain the parts washer inside the shed, protected from weather in the event of a release. It was discussed that a small volume of spent mineral spirits may be added to the used oil for disposal as long as it does not cause the used oil to be considered ignitable and the used oil transporter is notified and approves. Spent mineral spirits may also be disposed thru the Sarasota County Project Green Sweep program. Information about the program was provided to Mr. Baxter at the time of the inspection, along with used oil labels and stencils.

PHOTO ATTACHMENTS:

Used oil storage tank



Truck and job box for transporting used oil



parts washer



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		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	1		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	~		

Inspection Date: 02/13/2020

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.

Karen R. Bayly	Environmental Consultant			
Principal Investigator Name	Principal Investigator Title			
Koryn Bright	DEP	02/19/2020		
Principal Investigator Signature	Organization	Date		
Cory Baxter	Owner			
Representative Name	Representative Title			
	Mobile Impact Services			
	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: Karen R. Bayly

Inspection Approval Date:

02/19/2020