



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

FACILITY INFORMATION:

Facility Name: Capital Marine Group LLC
On-Site Inspection Start Date: 06/29/2022 **On-Site Inspection End Date:** 06/29/2022
ME ID#: 141587 **EPA ID#:** FLR000234906
Facility Street Address: 700 SE 32nd Ct Ste CMG , Fort Lauderdale, Florida 33316-4133
Contact Mailing Address: PO Box 22416, Fort Lauderdale, Florida 33335
County Name: Broward **Contact Phone:** (954) 764-4220

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Tarin F Tischler, Inspector
Michele De Freitas, Environmental Specialist II; Johnathan Hines, COO; Ron
Other Participants: Hoogesteyn, Advisor

LATITUDE / LONGITUDE: Lat 26° 5' 3.8184" / Long 80° 8' 10.1076"

NAIC: 484220 - Specialized Freight (except Used Goods) Trucking, Local

TYPE OF OWNERSHIP: Private

Introduction:

On June 29, 2022 (06/29/2022), Tarin Tischler with the Florida Department of Environmental Protection (FDEP) conducted a routine compliance evaluation inspection at Capital Marine Group, LLC (hereinafter CMG or facility), located at 700 SE 32nd Ct Ste CMG, Ft. Lauderdale, FL 33316. The facility was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Part 260-268 and 279, adopted and incorporated by reference in Rule 62-710, and 62-730 Florida Administrative Code (FAC). The inspector was accompanied by Michele DeFreitas, Environmental Specialist II, from the FDEP.

The inspectors were escorted around the facility by Jon Hines, President, and Ron Hoogesteyn, Advisor. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection. Capital Marine Group occupies 5,000 square feet and is connected to public water and sewer. The facility has been operating at its current location since 2020 and employs 7 staff. The facility operates from Monday through Friday from 8 am to 5 pm with some overtime as needed.

Notification History:

Capital Marine Group initially notified with the Department as a Used Oil and Used Oil Filter Transporter on 06/23/2020. The facility was assigned the EPA Identification Number (EPAID) FLR000234906. The facility most recently notified via submittal of 8700-12 and annual report for used oil and used oil filter handlers on 02/28/2022.

Inspection history:

The facility has never been inspected by the Department.

Personal Protective Equipment (PPE) was not required to enter the facility. Inspectors were equipped with steel-

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toed boots and face masks.

Process Description:

Capital Marine Group, Limited Liability Company (LLC) operates as a marine vessel service provider for mega-yachts. CMG operates as a used oil transporter and offers services that include fuel tank cleanings and pressure washings, oil and fuel tank pump out and disposals, fuel polishing, and bilge pressure washing. The facility transports used oil and oily water and does not transport hazardous waste or petroleum contact water. CMG is also notified as a used oil filter transporter, but only offer used oil filter disposal as a courtesy to customers who already have a drum of filters on-site to be transported at the time of servicing tank cleanouts. The company services large mega-yacht corporations rather than privately owned vessels, so occasionally customers store filters on site. Most requests for used oil filter transportation and all requests for universal waste transportation are subcontracted to Cliff Berry, Inc (CBI). Mr. Hogg informed inspectors that the part owner of Capital Marine Group is also the part owner of CBI, but the businesses operate completely separately.

Mr. Hoogesteyn told inspectors that he previously owned the business Capitol Marine Industries, which opened in 1983 and was later changed to Capital Marine Group, LLC when purchased by the part-owner of CBI. The previous business operated in four locations since its opening under EPAIDs FL0000962902, FLR000198671, FLR000137885, and FLD984183707. The facility changed locations under the new ownership and received a new EPAID number (EPAID: FLR000234906) on 06/23/2020. CMG did not begin operations until February 2021.

The facility consists of a small warehouse for product and equipment storage, an 8x15 trailer in the warehouse for administrative office activities, and an outdoor grassy area behind the warehouse for truck storage. Mr. Hines informed inspectors that no customer waste is stored here, and all trucks transport used oil and oily water to CBI Dania (EPAID: FLR000080071) on the same day of service.

Outdoor truck storage:

At the time of the inspection, the facility had all of CMG's three trucks stored in the outdoor grassy area behind the warehouse. One truck had a trailer with the capacity of approximately four 55-gallon drums and two tanker trucks with a 900 and 2,500-gallon capacity. The tank trucks require a Commercial Driver's License (CDL) to operate, while the other truck does not. The trucks are equipped with spill kits for used oil, fire extinguishers, registration, and insurance information. The tanker trucks were equipped with placards. The area where trucks are stored/parked is unpaved (permeable), but no used oil is stored on the trucks in this area. A water tank was observed in this area. Mr. Hines informed inspectors that the warehouse did not have water access. A 300-gallon tank of gasoline enclosed in a concrete containment was also observed in the outdoor truck storage area. Inspectors were informed by facility representatives that this tank was not in use.

Warehouse:

The warehouse is shared with another business, and Capital Marine occupies only the southwest corner of the warehouse. This area is used for minor product and equipment storage. At the time of the inspection, inspectors observed the following:

- One pallet containing three 5-gallon drums and 6 bags of blast media
- One partially full 15-gallon carboy container labeled "CMG." Facility representatives informed inspectors that this drum contained used oil generated from CMG's trucks and pressure washer.
- One empty 15-gallon carboy container labeled "CMG."
- One 15-gallon container labeled "Mansize degreaser." Facility representatives informed inspectors that this drum contained product.
- One 5-gallon drum labeled "Shell Turbo - Heavy Duty Tire Sealant and Conditioner". Facility representatives informed inspectors that this drum contained product.

Inspectors requested during the inspection that the facility label the 15-gallon container of used oil "Used Oil," per 40 CFR 279.22(c)(1). This was corrected on-site. Inspectors also asked facility representatives what the blast media was used for, and if the media was not intended to be used it was considered stored in lieu of being abandoned and meets the definition of a solid waste under 40 CFR 261.2(b)(3). Inspectors requested a proper waste determination and disposal of the blast media, per 40 CFR 262.11. Mr. Hines informed inspectors that the former business, Capitol Marine Industries, conducted blasting under their blast tank coating services. CMG does not perform blasting currently but wants this to be offered eventually as the business expands. The media is stored here because it is valuable and is intended to be used eventually, so the facility wants to save it.

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Records Review:

The facility records were stored in CBI's Fort Lauderdale office. Inspectors moved to this location for records review.

Registration:

As a used oil transporter, CMG shall annually register their used oil handling activities with the Department using Form 62-730.900(1)(b), "8700-12FL – Florida Notification of Regulated Waste Activity" in accordance with 62-710.500(1) F.A.C. The facility's registration as a used oil and filter transporter is up to date and is valid until 06/30/2023. The facility first annually registered on 07/16/2020 and has had no gaps in registration since this point.

Used Oil Tracking:

Used oil acceptance and delivery records for the years 2020, 2021, and 2022 were requested and reviewed onsite. CMG uses non-hazardous waste manifests as used oil acceptance and delivery records. Based on these records, the facility documents acceptance of waste with the following description: oily water, nonhazardous diesel fuel waste, nonhazardous gas waste, and used oil filters. At the time of the inspection, the most recent shipment took place on 06/16/2022. Nonhazardous waste manifest number 06/16/22 D documented the facility transported 875 gallons via tanker truck of oily water/waste (nonhazardous) from generator M/Y Amaral to Cliff Berry Dania (EPAID: FLR000080071). Inspectors requested additional manifests in the exit interview for further review.

Rebuttable Presumption:

The facility stated that drivers conduct tests prior to receiving each used oil load to ensure that the total halogen content of the used oil being transported is below 1,000 parts per million (ppm), pursuant to 40 CFR 279.44(a). CMG documents these tests on the nonhazardous waste manifests which are retained for three years, in accordance with 40 CFR 179.44(d) and 62-710.510(g) F.A.C.

Employee Training:

Pursuant to Rule 62-710.600(2)(c) F.A.C., the facility shall maintain training records of the personnel indicating the type of training received along with the date and signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review for Department personnel during inspections. The facility provided records of employee training from the facility's opening in 2020 up to 2022. The most recent training was conducted on 05/13/2022 and included Confined Space Training, Department of Transportation Training, Portable Fire Extinguisher Training, and Bloodborne Pathogens Training. DOT HAZWOPER training certificates were also observed for Mr. Hines and Mr. Hoogesteyn. Training is conducted externally by CBI.

Proof of Liability Insurance:

Records of the facility's Used Oil Handler Certification of Liability Insurance forms from 2020, 2021 and 2022 were available for review. CMG was able to provide proof of liability insurance with Steadfast Insurance Company (policy number: GPL0274654-04), and Zurich American Insurance Company (policy number: BAP0274662-04.) Both policies are valid until 12/31/2022 [62-710.600(2)(e) FAC].

Annual Report for Used Oil and Used Oil Filter Activities:

Annual reports for the last three years were available for review. The 2021 Used Oil and Used Oil Filter Handlers Annual Report for Capital Marine Group stated that a total of 34,430 gallons of used oil and zero used oil filters were managed in Florida.

PHOTO ATTACHMENTS:

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Facility Warehouse

8x15 trailer inside warehouse



Outdoor truck storage

Product and equipment storage in warehouse



Container of used oil - originally not labeled, corrected on site

Blast media



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Most recent nonhazardous manifest at time of inspection

nonhazardous manifest 6/15/2022

Conclusion:

Capital Marine Group, LLC was inspected as a transporter of used oil and used oil filters on 06/29/2022 and found to be in compliance.

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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	✓		

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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

Tarin F Tischler**Principal Investigator Name**Inspector**Principal Investigator Title**DEP**Organization**08/15/2022**Date****Principal Investigator Signature**Michele De Freitas**Inspector Name**Environmental Specialist II**Inspector Title**DEP**Organization**Johnathan Hines**Representative Name**COO**Representative Title**Capital Marine Group**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.

Ron Hoogesteyn**Representative Name**Advisor**Representative Title**Capital Marine Group**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:**Alannah B Irwin**Inspection Approval Date:**08/15/2022