



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

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**FACILITY INFORMATION:**

**Facility Name:** Clean Earth Specialty Waste Solutions Inc  
**On-Site Inspection Start Date:** 10/20/2022 **On-Site Inspection End Date:** 10/20/2022  
**ME ID#:** 153599 **EPA ID#:** FLR000258285  
**Facility Street Address:** 6100 NW 74th Ave, Medley, Florida 33166-3710  
**Contact Mailing Address:** 6100 NW 74th Ave, Medley, Florida 33166  
**County Name:** Miami-Dade **Contact Phone:** Data is missing from FIESTA

**NOTIFIED AS:**

VSQG

**WASTE ACTIVITIES:**

**Generator:** VSQG

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter Facility  
Routine Inspection for Hazardous Waste Transfer Facility Facility  
Routine Inspection for Used Oil Transporter Facility  
Routine Inspection for VSQG (<100 kg/month) Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Michele C DeFreitas, Inspector  
Tarin Tischler, Environmental Specialist III; Johanna Polycart, Environmental Specialist II;  
**Other Participants:** Pamela Coffin, Environmental Specialist I; William Gonzalez, Field Services Manager

**LATITUDE / LONGITUDE:** Lat 25° 49' 46.3764" / Long 80° 19' 4.7856"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On October 20th, 2022 (10/20/2022) Michele De Freitas with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Evaluation Inspection for hazardous waste and used oil transporter and very small quantity generator of hazardous waste at Clean Earth Specialty Waste Solutions Inc (hereinafter Clean Earth or facility), located at 6100 NW 74th Ave Medley, Florida, 33166. Clean Earth was inspected to determine the facility's compliance with State and Federal Hazardous Waste Regulations described in Title 40 Code of Federal Regulations (CFR) Parts 260-268, and 279 adopted and incorporated by reference in Rule 62-710, and 62-730 Florida Administrative Code (F.A.C.). The inspector was accompanied by Tarin Tischler, Environmental Specialist III, Johanna Polycart, Environmental Specialist II and Pamela Coffin, Environmental Consultant with FDEP.

The inspectors were escorted around the facility by William Gonzalez, Manager of Field Services of Clean Earth Specialty Waste Solutions Inc. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

Clean Earth has been operating at this location since May 22, 2022; however, they haven't commenced any regulated activities due to the fact that they have not obtained their operating permits from the County yet. The facility occupies approximately 24,720 square feet and is connected to the City of Miami's water and sewer services. Clean Earth employs approximately 20 employees. The facility operates Monday to Friday from 7:30 AM to 4:30 PM

Notification History:

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Clean Earth originally notified with the Department as a Universal Waste Handler, Hazardous Waste Transfer Facility (10-day), Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transfer Facility, and a Very Small Quantity Generator of Hazardous Waste on 10/10/2022. The facility was assigned an EPA Identification (EPAID) Number FLR000258285.

### Inspection History:

The facility has never been inspected by the Department.

The only Personal Protective Equipment (PPE) required to enter the facility were face masks.

Department personnel was equipped with steel-toe boots.

### Process Description:

Clean Earth provides a comprehensive array of waste treatment, disposal, and recycling solutions for hazardous and non-hazardous waste, contaminated soil, dredge material, electronics, aerosols, universal wastes, and pharmaceuticals destined for incineration. The facility does not handle any waste at this location as they recently opened here and have not obtained all their correct permits from the county level to begin full operations. However, they still offer their transporter services to their customers in the interim and have contracted Cliff Berry Inc. (CBI) to take any wastes picked up from their customers to the CBI Miami facility for treatment and disposal.

### Customer Procedures:

Clean Earth services from Vero Beach to the Florida Keys and Port Charlotte. Their customer base is made up of manufacturers, wholesalers, and retailers of pharmaceuticals and other consumer products, industrial operations, and hospitals. Clean Earth requires customers to submit a waste profile prior to the pick-up of hazardous waste and then Clean Earth submits that waste profile to the designated facility of disposal for approval. Once the waste profile is approved, Clean Earth then provides the generators with a description of the waste and an acceptance letter, a date and time is then scheduled for pick-up.

### Office Area:

This area serves as the entrance area to the facility and is consisted of a reception area, one open office space, one separate office which is the manager's office, and a kitchen area.

No hazardous waste was observed in this area during the inspection.

### Warehouse Area:

The facility is comprised of a 20,700 square feet area indicated will be used to house hazardous waste, universal waste, pharmaceutical waste, and used oil and filters. There is a further 4,020 square feet which was indicated by Mr. McCaustland, Clean Earth's representative for Permitting and Compliance is reserved for future solid waste processing. The facility comprises six (6) bays but only five (5) were being used. Mr. McCaustland highlighted that the bays will be marked with floor markings to identify what type of waste is stored in the designated bay, for example (Bay 1: Universal Waste, Bay 2: Pharmaceutical Waste, etc).

At the time of the inspection, inspectors observed the following:

- Bay 1 – storage of office supplies and employee lockers
- Bay 2 – empty
- Bay 3 – stored empty plastic drums
- Bay 4 – was empty but used for extra storage
- Bay 5 – stored empty metal drums, small plastic drums, and cardboard barrels
- Bay 6 – has a small office area and would be used for future solid waste processing but was currently empty at the time of the inspection.

Within the warehouse area inspectors observed that each bay was fitted with fire extinguishers, fire alarms, and red satellite accumulation waste cans properly labeled "Oily Waste Can" which were empty at the time of the inspection.

No sprinkler systems were noted and when inspectors inquired, facility manager Mr. William Gonzalez indicated that the facility was awaiting document approval from their Permitting Department. The warehouse area was also missing a two-way communication system/ intercom, eyewash stations and emergency showers which Mr.

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Gonzalez indicated will be installed pending approval from their Permitting Department.

In Bay 3, inspectors observed one (1) 30-gallon drum labeled with the words "Non-Hazardous Waste". This drum was generated from a Home Depot located at 3730 Sun City Ctr Blvd, Ruskin, FL, 33573 and dated 09/30/2022. The drum has since been disposed of.

There was no hazardous waste observed in this area.

### Outdoor Area:

The facility fleet trucks are parked and stored here. Mr. McCaustland indicated that the facility currently owns:

- Nine (9) box trucks which is used to pick up waste at customer locations and transport it back to the transfer station for building loads to a permitted TSDF
- Four (4) tractors used to pull trailers from the facility with waste or to the facility with supplies or waste for further transfer.
- Nine (9) trailers used to pull trailers from the facility with waste or to the facility with supplies or waste for further transfer.
- Two (2) transit vans used to take supplies and employees to customer sites and occasionally pick up waste in an emergency or unusual situation.

Each truck is fitted with the appropriate emergency equipment such as fire extinguishers and spill kits, as well as permits displayed.

The trucks and trailers are all stored on a sloping concrete slab near the warehouse doors between bays 4 and 6.

There was no hazardous waste observed in this area.

Currently, no waste is stored on-site at this location however Clean Earth's trucks are still in operation, transporting waste to and from customer's locations to their contracted facility CBI to dispose of the waste until they obtain the correct permits for operations to begin.

### Records Review:

At the time of the inspection, all required records were not available on-site. Mr. Gonzalez indicated due to their recent move a lot of their records were boxed up and kept in storage until the office area is fully equipped to handle all documents at the location.

He was however able to provide some documentation such as:

### Certificates:

The certificates reviewed on-site were dated 06/23/2022 for the registration as a Used Oil Transporter, Transfer Facility, Filter Transporter, and Filter Transfer Facility. However, this registration was for the old location at 8505 NW 74th Street Medley, Florida, 33166 under the old EPA ID Number FL0000702985.

Also, their Hazardous Waste Transporter Certificate of Approval was dated 06/23/2022. This registration was also for the old location at 8505 NW 74th Street Medley, Florida, 33166 under the old EPA ID Number FL0000702985.

Their Registration as a Very Small Quantity Generator (VSQG) of Hazardous Waste, Universal Waste – Batteries, Pesticides, Lamps, Devices Registration, and Large Quantity Handler was dated 06/23/2022. This registration was also for the old location at 8505 NW 74th Street Medley, Florida, 33166 under the old EPA ID Number FL0000702985.

In the exit interview dated 10/28/2022 and a follow-up email dated 12/01/2022, the inspectors requested updated certificates of approval and registration certificates from the facility. The Department still awaits these submittals.

On 12/06/2022, Mr. McCaustland indicated that they are still awaiting the official updated certificates of approval and registration certificates from FDEP Tallahassee office.

Their new 8700-12FL Notification Form was received by the Department on 10/10/2022 and shows that they are registered using their new location 6100 NW 74th Ave Miami, Florida, 33166. The form also shows they are registered as a VSQG of Hazardous Waste, Hazardous Waste Transporter, Large Quantity Handler of Universal

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Waste Batters, Pesticides and Mercury Containing Devices, Transporter of Universal Waste – Mercury-Containing Lamps and Devices and Transfer Facility for Universal Waste Mercury-Containing Lamps and Devices. They are also registered as a ten (10) day transfer facility, used oil transporter and transfer facility, and used oil filter transporter and transfer facility. This was signed by the facility on 10/06/2022.

### Liability Insurance:

The most recent Certificate of Liability Insurance to show that they are insured as a Hazardous Waste Transporter and Used Oil Handler was effective on June 30th, 2022 and expires on June 30th, 2023. Clean Earth maintains a combined single limit of \$5,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number AL7030964. They are also covered for contractors' pollution liability, pollution legal liability, professional liability and excess workers compensation.

This supports the use of provision 62-730.170(2)(a) F.A.C.

### Contingency Plan/Spill Prevention, Control, and Countermeasure (SPCC) Plan:

During the inspection, inspectors reviewed the Transportation Spill Contingency Plan onsite which included all emergency contacts and coordinators for all Clean Earth locations, driver training, emergency response contractors, and cleanup contractors. This plan was recently revised on 07/20/2022, as per 40 CFR 265.52.

On 11/02/2022, Mr. McCaustland submitted a copy of Clean Earth's most recently updated contingency plan (10/06/2022), specific to the new location. The plan included all emergency contacts, and emergency coordinators, a list of all local authorities they are reporting to in the area, evacuation maps showing locations of all emergency equipment and first aid kits, a secondary map showing the facility's muster points and emergency exits which also details the evacuation plan and clean up procedures.

There were no mail receipts to show proof that they did make initial contact with local authorities in the area. This was requested in a follow-up email dated 12/01/2022.

### Closure Form:

On 11/02/2022, Mr. McCaustland submitted an 8700-12FL Notification Form to indicate the closure of their old location, 8505 NW 74th Street Medley, Florida, 33166 under EPA ID Number FL0000702985. This was sent on 11/03/2022 to the Department which is still being processed.

### Training:

On 11/03/2022, Mr. McCaustland also provided a copy of the training log of all employees with their required training and the dates that the training took place for HAZWOPER, RCRA and DOT training. This training included drivers that were most recently trained on 10/24/2022 as per 40 CFR 262.16 (b)(9)(iii).

### Manifests:

Due to the facility's recently move all manifest records were stored in a storage unit as indicated by the facility manager, Mr. Gonzalez. However, on 11/17/2022, Mr. McCaustland submitted a portable thumb drive with manifest documentation from 2019-2022.

Inspectors reviewed the documentation and found some discrepancies in the manifests between 2019-2021. The facility was asked on 12/01/2022 to clarify the dates the waste was handed off to the second transporter for disposal and any exceedances past 24 hours during the moving/ transition period from Stericycle to Clean Earth and with the change of location.

On the thumb drive submitted inspectors reviewed the three (3) most recent uniform hazardous waste manifests dated 10/14/2022.

The first manifest under manifest tracking number 200252757CLE, was for the generator Home Depot #6355 located at 33001 South Dixie Hwy Florida City, FL, 33034 (EPA ID: FLR000112169). The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC Miami Terminal (EPA ID: FLR000083071). The waste collected was two hundred and eighteen pounds (218lbs) of "UN1993 Waste Flammable Liquids" carrying waste codes D001, D018 and D035. Sixty-five pounds (65lbs) of "UN1950 Waste Aerosols" carrying waste codes D001, D005, D007, D008, D035 and D039. Twenty pounds (20lbs) of "UN1011 Butane" no waste code was affixed to this waste and fifty-three pounds (53lbs) of "UN1791, Waste Hypochlorite Solutions" carrying waste code D002. The waste was taken to the designated facility Allworth LLC (EPA ID: ALD094476793) located at 500 Medco Road Birmingham, Alabama, 35217.

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This manifest also had the corresponding signed and dated Land Disposal Restriction Form (LDR) attached to it.

The second manifest under manifest tracking number 200252758CLE, was for the generator Home Depot #6339 located at 15750 SW 88th Street Miami, Florida, 33196 (EPA ID: FLR00011218). The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC Miami Terminal (EPA ID: FLR000083071). The waste collected was three pounds (3lbs) of "UN1011 Butane" with no waste codes. Twenty-five pounds (25lbs) of "NA3077 Hazardous Waste Solid" carrying waste code D016. Twenty-one pounds (21lbs) of "UN1791 Waste Hypochlorite Solutions" carrying waste code D002. Two hundred and forty-eight pounds (248lbs) of "UN1993, Waste Flammable Liquids" carrying waste codes D001, D018, and D035 and one hundred and fifty-one pounds (151lbs) of "UN1950 Waste Aerosols" carrying waste codes D001, D005, D007, D008, D035 and D039. There was also universal waste – fluorescent light tubes noted on this manifest in the amount of fourteen pounds (14lbs). The waste was taken to the designated facility Allworth LLC (EPA ID: ALD094476793) located at 500 Medco Road Birmingham, Alabama, 35217.

This manifest also had the corresponding signed and dated Land Disposal Restriction Form (LDR) attached to it.

The third manifest under manifest tracking number 200252759CLE, was for the generator Home Depot #0210 located at 12700 N Kendall Drive Miami, Florida, 33186 (EPA ID: FLD981925969). The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC Miami Terminal (EPA ID: FLR000083071). The waste collected was one hundred and fifty-four pounds (154lbs) of "UN1950 Waste Aerosols" carrying waste codes D001, D005, D007, D008, D035 and D039. Forty-eight pounds (48lbs) of "NA3077 Hazardous Waste Solid" carrying waste code D016 and one hundred and seventy-five pounds (175lbs) of "UN1993, Waste Flammable Liquids" carrying waste codes D001, D018, and D035. The waste was taken to the designated facility Allworth LLC (EPA ID: ALD094476793) located at 500 Medco Road Birmingham, Alabama, 35217.

This manifest also had the corresponding signed and dated Land Disposal Restriction Form (LDR) attached to it.

On the thumb drive submitted inspectors also reviewed the three (3) most recent non-hazardous waste manifests dated 10/14/2022.

The first manifest under waste tracking number 522533-22, was for the generator Westside Regional Medical Center - IWSS located at 8201 W Broward Blvd Plantation, FL, 33324 (EPA ID: FLD096572300). The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC (EPA ID: FLR000083071). The waste collected was one hundred and fourteen pounds (114lbs) of "Non-Hazardous, Non-Regulated Pharmaceuticals". The waste was taken to the designated facility Clean Earth Specialty Waste Solutions Inc. (Orlando) (EPA ID: FLR000006353) located at 314- M W Landstreet Road Orlando, Florida, 32824.

Attached to this manifest was the corresponding Waste Receipt Container Check-in which was correctly dated and signed.

The second manifest under waste tracking number 523560-22, was for the generator West Boca Hospital located at 21644 State Road 7 Boca Raton, Florida, 33428 (EPA ID: FLD982077364). The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC (EPA ID: FLR000083071). The waste collected was sixty pounds (60lbs) of "Non-Hazardous, Non-Regulated Liquid (10% Buffered Formalin)". The waste was taken to the designated facility Clean Earth Specialty Waste Solutions Inc. (Orlando) (EPA ID: FLR000006353) located at 314- M W Landstreet Road Orlando, Florida, 32824.

Attached to this manifest was the corresponding Waste Receipt Container Check-in which was correctly dated and signed.

The third manifest under waste tracking number 560905-22, was for the generator Carnival Conquest located at 1015 N America Way Miami, Florida, 33132. The waste was first picked up by Clean Earth Specialty Waste Solutions (EPA ID: MNS000110924) and transferred to Cliff Berry INC (EPA ID: FLR000083071). The waste collected was one thousand, five hundred and forty-four pounds (1544lbs) of "Oily Rags". One hundred and thirty-six (136lbs) of "Oily Debris". Four hundred and twenty-eight pounds (428lbs) of "Bilge Rust Sediment". Two



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hundred and seventy-one pounds (271lbs) of "Sewage Sludge/Sediment" and five hundred and sixty-six pounds (566lbs) of "Non-Regulated/ Non RCRA Regulated Black Water". The waste was taken to the designated facility Clean Earth Specialty Waste Solutions Inc. (Orlando) (EPA ID: FLR000006353) located at 314- M W Landstreet Road Orlando, Florida, 32824.

Attached to this manifest was the corresponding Waste Receipt Container Check-in which was correctly dated and signed.

## PHOTO ATTACHMENTS:

Front of the Facility



Satellite Container



Storage Area Bay 1



Empty Drum Storage





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Drum of Waste



Drum of Waste 2



Empty Drum Storage 2



Trailer outside



### Conclusion:

Clean Earth Specialty Waste Solutions Inc was inspected as a very small quantity generator of hazardous waste, hazardous waste transfer facility, used oil transporter and transfer facility, used oil filter transporter and transfer facility, universal waste transporter, and transfer facility, and universal pharmaceutical waste transporter and transfer facility and was found to be out of compliance at the time of the inspection for failure to have the proper manifest documentation and notification with local authority in the area .

On 12/19/2022, Mr.McCaustland submitted documentation to show proof of notification with local authority in the Miami are, this violation has been resolved as of 12/19/2022.

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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

Michele C DeFreitas**Principal Investigator Name**Environmental Specialist II**Principal Investigator Title****Principal Investigator Signature**FDEP**Organization**12/19/2022**Date**Tarin Tischler**Inspector Name**Environmental Specialist III**Inspector Title**FDEP**Organization**Johanna Polycart**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Pamela Coffin**Inspector Name**Environmental Specialist I**Inspector Title**FDEP**Organization**William Gonzalez**Representative Name**Field Services Manager**Representative Title**Clean Earth Specialty Waste  
Solutions**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:**12/19/2022