



Florida Department of
Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Karmi Environmental LLC
On-Site Inspection Start Date: 10/27/2022 **On-Site Inspection End Date:** 10/27/2022
ME ID#: 56326 **EPA ID#:** FLR000000166
Facility Street Address: 8470 NW 68th St , Miami, Florida 33166-2661
Contact Mailing Address: 8470 NW 68th St, Miami, Florida 33166-2661
County Name: Miami-Dade **Contact Phone:** (614) 408-8027

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for Transporter Facility
Routine Inspection for Universal Waste Transporter Facility
Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Tarin F Tischler, Inspector
Johanna Polycart, ESII; Michele DeFreitas, ESII; Helya Abraham, Safety Compliance
Other Participants: Paralegal; George Leon Vicenti, General Manager

LATITUDE / LONGITUDE: Lat 25° 50' 4.6497" / Long 80° 20' 7.5499"

NAIC: 562910 - Remediation Services

TYPE OF OWNERSHIP: Private

Introduction:

On October 27, 2022, Tarin Tischler with the Florida Department of Environmental Protection (DEP) conducted a Compliance Evaluation Inspection (CEI) at Karmi Environmental LLC (hereafter Karmi or Facility), located at 8470 NW 68th St, Miami, Florida 33166. Karmi 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) Parts 260-268, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.), and rule 62-710 for used Oil. The inspector was accompanied by Johanna Polycart, Environmental Specialist II, and Michele DeFreitas, Environmental Specialist II from the FDEP.

The inspectors were escorted around the facility by Helya Abraham, Safety Compliance Paralegal and George Leon Vicenti, General Manager. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

Karmi occupies approximately 1 acre and is connected to public water and sewer. Karmi has been operating at its current location since 1987 and employs 16 staff. The facility's office operates from 7:30 A.M. to 4:00 P.M. Monday to Friday, but the fleet responds to emergencies 24/7.

Notification History:

The facility initially registered with the Department in 03/23/1995 and was issued the EPAID number FLR000000166.

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Karmi is currently registered with the Department as of 07/12/2022, as a Commercial TSD, a Hazardous Waste Transporter, a Used Oil Transfer Facility, Used Oil Filter Processor and Transfer Facility, Mercury device Transfer facility, and a Very Small Quantity Generator of hazardous waste. This registration for the facility is valid through 6/30/2022.

Inspection History:

The facility was recently inspected by the Department as a Universal Waste (UW) transporter and transfer facility, Hazardous Waste (HW) transporter, Used Oil/Used Oil Filter transporter and transfer facility, and a Very Small Quantity Generator (VSQG) of HW on 02/27/2020, and was found to be in compliance.

Steel-toed boots, and hard hats were the only Personal Protective Equipment (PPE) required to enter the facility.

Process Description:

Karmi is a transporter/transfer facility who specializes in transporting hazardous waste, used oil, used oil filters, and universal waste from various customers. The facility uses one tanker truck with the capacity to transport 8,000 gallons, two vacuum trucks, one box truck and one 53 inches trailer.

Hazardous Waste Activities:

The facility is only allowed to store hazardous waste for 24-hour before it gets transported to the designated facility. The inspectors observed a 55-gallon drum of waste aerosol cans, labeled "Hazardous Waste" with a flammable liquid and corrosive placards, and closed at the time of the inspection. The waste was generated by South Florida Water Management, transported by Karmi, but will be picked up by Chem Kleen the same day to the designated facility.

Used Oil/Oily Water Activities:

Used oil picked up from costumers will be transferred to a rail car for transportation. Before transport to Karmi, the used oil from the customer is sniffer tested, and if further testing is needed a Dexsil test kit will be used.

The facility uses two oil filter crushers that have a 300 gallons capacity, that is used to crush filters that are received from the customers, and any excess oil generated from the process is stored in the Used Oil Tank before disposal.

The crushed filters are stored in a 20-yard roll off container before being disposed. Compliance Assistance was provide onsite to the facility to label the container with the words "Used Oil Filters", and the issue was resolved at the time of the inspection.

Waste Oily solids including oily rags are stored in a roll-off container, then disposed by Waste Management to the Medley Landfill.

Maintenance Shop:

The facility conducts simple maintenance on their own vehicles on site. Used oil, used oil filters, used batteries and oily rags are generated in this area. The inspectors observed an indoor filter crusher, a 500-gallons tank labeled "Used Oil Only", one container of used filters labeled "Drained Used Oil Filters", and one container labeled "Oily Rags & Absorbents".

One 55-gallon of used oil was observed in the area labeled "Waste Oil", and compliance assistance was offered to the facility to label the container of used oil with the words "Used Oil". The issue was resolved at the time of the inspection.

Tank Farm:

The facility operates six tanks, enclosed by a clean secondary containment.

The configuration of the tanks was as follow:

- One horizontal tank labeled Used oil with a capacity of 10,000 gallons.
- Five vertical tanks, #2 was empty labeled Used Oil with a capacity of 8,000 gallons, #3 labeled Decanter Tank used for oily water storage, #4 Empty, #5 Empty.

Records Review:

- The facility's permits and registration forms were displayed on the wall at the entrance, and no discrepancy was observed.

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- Manifests of transportation of hazardous waste were reviewed onsite for the past three years, and no deficiency was observed. Karmi hands off hazardous waste to the second transporter Chem Kleen (FLR0000231250), and the designated facility is Allworth LLC (ALD094476793) located in Alabama.
- Records of receipt and shipping of Used Oil were available for review for the past three years. The facility shipped the used oil to the recyclers Vertex Energy and Noble Oil.
- The facility maintains a full Spill Prevention Control & Countermeasure Plan (SPCC) and Contingency Plan last reviewed in May 2021 to reflect the change of name of the company.
- Tank Inspection logs were available for review. Monthly a throughout inspection is performed on the integrity of the tanks and the secondary containment.
- Liability Insurance plan in the amount of \$2,000,000. The plan policy #GPL 614229801 is insured by Steadfast Insurance Company and expires on 03/29/2023.
- Certificate for training in Hazwoper for employees handling hazardous waste and used oil were available for review, and the training was updated in August 2022.

PHOTO ATTACHMENTS:



Tank Farm

Filter Crusher



Crushed Filters container



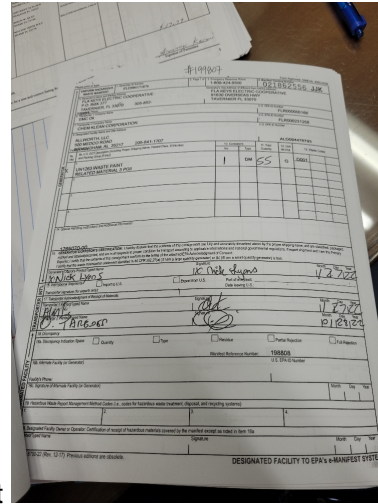
Hazardous Waste Label



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Maintenance Area



Manifest

Conclusion:

Karmi Environmental LLC was inspected as a Transporter of Hazardous Waste and Universal Waste, Transporter of Used oil and Transfer Facility, Used Oil Filter Processor and Transporter, and was found to be in compliance at the time of the inspection.

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6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

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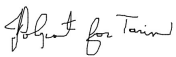
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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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	Inspector
Principal Investigator Name	Principal Investigator Title
	DEP
Principal Investigator Signature	Organization
	12/20/2022
	Date
Johanna Polycart	ESII
Inspector Name	Inspector Title
	DEP
	Organization
Michele DeFreitas	ESII
Inspector Name	Inspector Title
	DEP
	Organization
Helya Abraham	Safety Compliance Paralegal
Representative Name	Representative Title
	Karmi
	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.

George Leon Vicenti	General Manager
Representative Name	Representative Title
	Karmi
	Organization

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Report Approvers:

Approver: <u>Alannah B Irwin</u>	Inspection Approval Date: <u>12/20/2022</u>
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