From:	Bryan, Susan
To:	andrew@alltankservicesfl.com
Cc:	Irwin, Alannah; Polycart, Johanna; Knight, Jade
Subject:	Exit Interview: All Tank Services (EPA ID FLR000253724)
Date:	Thursday, May 11, 2023 12:20:00 PM
Attachments:	Funnel with lid- no address.JPG CAP - HW Used Oil Transporter - Inspection Checklist.pdf

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Good morning,

This email serves as an Exit Interview for the Used Oil Transporter and Hazardous Waste Compliance Evaluation Inspection conducted at your facility located at 1903 W McNab Rd Ste B, Pompano Beach, Florida on 05/10/2023. First, I want to thank you and your team for your level of cooperation and for your time and patience given during the inspection. We truly appreciate it.

As discussed during our visit, I am reaching out to you to request some additional information and supporting documentation to facilitate the completion of the inspection report that would count toward your in-compliance status. Please provide the following documentation by **May 24, 2023**.

1. The facility must retain written records and other receipts documenting proper disposal for at least three (3) years at the street address of the facility [F.A.C. 62-710.510(4)]. Please provide copies of waste manifests from May 10, 2020 through 2021 for hazardous and non-hazardous waste. When you scan or copy them, please ensure they are dark enough to be read. It would be best if you can combine them in a pdf.

2. The facility must provide a record of analysis (i.e. halogen screening, Dexil results) or specific process knowledge used to ensure the oil is not hazardous waste [40 CFR 279.46(a) and 279.44]; reference attached checklist: Transporter Recordkeeping and Rebuttable Presumption sections].

3. The facility must maintain training records and annual updates for all employees who handle used oil or hazardous waste [F.A.C. 62-710.600(2)(b, c, d)]. Please provide a training log and an example of training content for transporters/drivers that includes:

    a. State and federal rules governing used oil
    b. Proper used oil management practices, including spill response
    c. SOP for halogen screening (including instrument specs and capabilities, calibration methods, procedures for loads in excess of 1,000 ppm)
    d. Record keeping procedures for all loads accepted or rejected if applicable

4. Please refer to DOT regulations in 49 CFR 171-180 for the appropriate placards and registration numbers for your vehicle(s).

5. In order to prevent the labels on your drums of waste MEK from being damaged by spills, I would suggest that you equip the drum with a covered metal funnel. See attached photo taken at another facility. The funnel makes waste transfer into the drum much more convenient.

During the initial review of your hazardous waste manifests, it appeared that your facility is a Very Small Quantity Generator (VSQG) of Hazardous Waste. However, CBI's paperwork refers to All Tank Services as a Small Quantity Generator (SQG) of hazardous waste. We will review your manifests for the past three years to be certain, but you may be required to register with the Department as a Small Quantity Generator (SQG) of hazardous waste which has more stringent requirements than a VSQG. Once I receive the remainder of your manifests and review them, I can advise you how to proceed.

If you have any additional questions or concerns, feel free to contact me via email or at the contact number below. Thanks again for your diligence and attention to these matters.

Kind Regards,

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