



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

FACILITY INFORMATION:

Facility Name: Marine Waste Management Inc

On-Site Inspection Start Date: 04/20/2023

On-Site Inspection End Date: 04/20/2023

ME ID#: 152189

EPA ID#: FLR000255638

Facility Street Address: 4491 Ravenswood Rd Slip W1, Fort Lauderdale, Florida 33312-5751

Contact Mailing Address: 160 Loquat Rd NE, Lake Placid, Florida 33852

County Name: Broward

Contact Phone: (954) 632-3296

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Johanna Polycart, Inspector

Other Participants: Crystal Torres, Administrator

LATITUDE / LONGITUDE: Lat 26° 4' 1.7472" / Long 80° 10' 10.9416"

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On April 20, 2023 (04/20/2023), Johanna Polycart with the Florida Department of Environmental Protection (DEP) conducted a routine Compliance Evaluation Inspection (CEI) Marine Waste Management Inc. (hereinafter Marine Waste or Facility), located at 4491 Ravenswood Rd Slip W1, Ft Lauderdale, FL 33312.

Marine Waste was inspected to determine the facility's compliance with the state and Federal hazardous waste and State Used oil regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260- 268, and 279, adopted and incorporated by reference in Rule 62-730 and 62-710 Florida Administrative Code (F.A.C.).

Representatives were not present at the time of the inspection, so the inspector conducted the site visit while being on the phone with Rodney Fulton and Crystal Torres. While at the site, the inspector presented their credentials and explained the purpose of the inspection over the phone.

Notification History:

Marine initially registered with the Department as a Used Oil Transporter on 08/31/2022 and was assigned the EPAID FLR000255638. The facility's used oil handler registration expires on 06/30/2023.

Inspection History:

The facility has never been inspected by the Department.

Personal Protective Equipment (PPE) was not required to enter the facility. The Department inspectors were equipped with steel-toed boots.

Process Description:

Marine Waste management provides multiple vessel waste management services including mobile pump out of used oil, and tank cleaning. The facility rents a parking lot at this location from Bayan Bay Marina Center, to

Inspection Date: 04/20/2023

store the pumping trucks. The facility consists of an open lot, and not an actual standing building.

The inspectors only observed two trucks, one 55-gallon of product hydraulic oil, and other vacuum equipment. No used oil containers was observed at the time of the inspection. The facility representative informed the inspector that when the vacuum trucks service the vessels, the used oil is transported to the designated facility that same day, and no used oil is stored on site.

In the facility's response to the Department's exit interview, the representative informed the inspector that the facility also transports used oil filters. Delivery tickets to World Petroleum (FLD980709075), also demonstrates that the facility transported one 55-gallon drum of used oil filters on 03/24/2023, and one 55-gallon drum of used oil filters on 10/13/2022. Compliance assistance was provided to the facility to register annually with the Department to be able to transport used oil filters. [62-710.850(3)(a), FAC].

Record Review:

- Delivery Records to World Petroleum (FLD980709075) were sent to the Department. Acceptance records are not available for review with the appropriate information as per 62-710.510(1)(a-c), and the facility does not use an equivalent form to DEP form 62-710.901(2). Marine only performs a Gas Alert Micro test, but does not conduct or record halogen test on used oil as per 40 CFR 279.44(b)(1-2).
- The facility could demonstrate liability insurance with Swiss Re Corporate Solutions America Insurance Corporation for \$1,000,000, policy number DDC1000002-02, expiring 09/29/2023. [62-710.600(2)(e), FAC]
- The facility provided training (40-hour HAZWOPER) to employees that handle used oil and hazardous waste, but the date of the training is 03/11/2009, and not renewed annually. [62-710.600(2)(c), FAC]
- The facility has not submitted an Annual Report for Used Oil and Used Oil Filters activities for the year 2022 activities to the Department by March 1st. [62-710.510(5), FAC]

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	279.46(a), 62-710.510(1)
Explanation:	Used Oil transporters must keep a record of each used oil shipment accepted for transport. Each registered person shall maintain records on DEP Form 62-710.901(2) or substantially equivalent forms which contain at least the same information as the Department form. As per 62-710.510(1)(a-g) the information required includes: Name & Address of facility providing the oil for transport, and EPAID, quantity of oil shipped, date of shipment, record of testing, and signature of oil provider.
Corrective Action:	Start using DEP Form 62-710.901(2) or an equivalent form for all accepted shipment of used oil.

Type:	Violation
Rule:	62-710.510(5)
Explanation:	The facility has not submitted an Annual Report by Used Oil and Used Oil Filter Handlers to the Department of their used oil and used oil filters activities from January 2022 to December 2022, by March 1st 2023.
Corrective Action:	Please submit your Annual Report to the Department as soon as possible.

Inspection Date: 04/20/2023

Type: Violation
Rule: 62-710.600(2)(b)
Explanation: The facility has not provided proper training to show evidence of familiarity with applicable state laws and rules governing used oil transportation, and no annual review is conducted.
Corrective Action: Provide proof of proper training to all employees.

Type: Violation
Rule: 62-710.850(3)(a)
Explanation: The facility has transported used oil filters without registering with the Department.
Corrective Action: Please show proof of registration.

PHOTO ATTACHMENTS:

Facility Vehicles



Conclusion:

Marine Waste Management was inspected as a Used Oil Transporter and was found to be out of compliance for not maintaining acceptance records with the required information, transporting used oil filters without registering, failure to submit an annual report to Department by March 1st, failure to provide training to personnel and renew the training.

A Compliance Assistance Letter will be sent to the facility.

Inspection Date: 04/20/2023

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			✓

Inspection Date: 04/20/2023

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

Johanna Polycart
Principal Investigator Name

Inspector
Principal Investigator Title



Principal Investigator Signature

<u>DEP</u>	<u>05/22/2023</u>
Organization	Date

Crystal Torres
Representative Name

Administrator
Representative Title

Marine Waste Management
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: 05/22/2023