



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

FACILITY INFORMATION:

Facility Name: All Tank Services LLC

On-Site Inspection Start Date: 05/10/2023

On-Site Inspection End Date: 05/10/2023

ME ID#: 151015

EPA ID#: FLR000253724

Facility Street Address: 1903 W McNab Rd Ste B, Pompano Beach, Florida 33069-4301

Contact Mailing Address: 4670 NE 15th Ave, Oakland Park, Florida 33334

County Name: Broward

Contact Phone: (954) 261-8241

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Susan Bryan, Inspector

Other Participants: Jade Knight, ES II, Andrew Driessen, Owner

LATITUDE / LONGITUDE: Lat 26° 12' 40.9644" / Long 80° 8' 56.8032"

NAIC: 336611 - Ship Building and Repairing

TYPE OF OWNERSHIP: Private

Introduction:

On May 10, 2023 (05/10/2023), Susan Bryan with the Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) at All Tank Services located at 1903 West McNab Road Suite B. All Tank Services (herein referred to as "facility" or "ATS") 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, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.). The inspector was accompanied by Jade Knight, ES II, from the FDEP.

The inspectors were escorted around the facility by Andrew Driessen, facility owner. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

ATS occupies 14,000 square feet and is connected to Pompano Beach public sewer and water. ATS has been operating at its current location since November 2020 and employs 12 staff. The facility operates from 6 a.m. until 5:00 p.m. seven days per week depending on the demand.

Notification History:

ATS initially notified with the Department as a Used Oil and Used Oil Filter transporter on 03/29/2022. The facility was assigned the EPA Identification (EPAID) Number FLR000253724.

Inspection History:

The facility was not previously inspected by the Department.

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

Process Description:

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ATS offers waste transportation services for used oil, oily water, and used oil filters. The facility does not transport hazardous waste or petroleum contact water.

ATS provides tank pump outs and cleaning, bilge cleaning, abrasive blasting, hull cleaning, and painting for the marine industry. Diesel fuel, sludge, and oily water are vacuumed from tanks and transported to World Petroleum. The facility consists of office areas, a small common area, and a warehouse where equipment and supplies are stored. Products such as paint and blast media are stored in the warehouse. Trucks are parked at the back of the building when not in use. The back of the facility is fenced, and the gate is secured with a lock when not in use.

Most waste is generated offsite where the clients' tanks and/or vessels are located, but VSQG-amounts of hazardous waste are generated at the shop when the paint guns and associated equipment are cleaned with solvent [methyl ethyl ketone (MEK)] and maintenance is performed on company vehicles. Waste generated from these processes includes used oil, used oil filters, spent blast media, and paint-related waste containing MEK and xylene. Painted-related waste exhibits characteristics of ignitability for MEK (EPA waste codes: D001 and D035). This waste is also listed as non-halogenated solvents for MEK and xylene (EPA Waste Codes: F003 and F005). The facility presented documentation to demonstrate that spent blast media is tested [TCLP heavy metals (RCRA 8)]; To date, no samples have been determined as hazardous.

The facility does not store oily water, used oil, or filters on site. Oily waste is taken to World Petroleum Corporation (EPA ID FLD980709075) on the same day as service.

Records Review

Manifests:

The facility maintains copies of manifests for a period of three years [40 CFR 263.22(a)]. Records for 2022 and 2023 were available for review, but records for 2021 and older were in storage. Compliance assistance was offered during the CEI and Exit Interview to maintain records on site for a three-year period.

Based on the manifest records, the facility operates as a transporter of oily water and complies with the 24-hour time limit for storage [40 CFR 263.12(a), Rule 62-730.171(2)(a) F.A.C.].

Certificate of Liability Insurance:

The facility maintains financial responsibility for sudden accidental occurrences in a minimum amount of \$1,000,000 per occurrence for combined coverage of injury to persons and for damage to property and the environment from the spillage of waste while such wastes are being transported including the costs of cleaning up the spill. Certificate of Liability Insurance Hazardous Waste Transporter and Used Oil Handler, Form 62-730.900(5)(a), was available on-site for inspector review. The facility provided a Certificate of Liability Insurance issued by Liberty Mutual and Argonaut Insurance Company under policy number MLIB1000488-06. The Policy period is 10/05/2022 to 10/05/2023. The coverage applies for sudden accidental occurrences and limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate.

Hazardous Waste Storage Area:

At the time of the inspection, inspectors observed the following in the hazardous waste storage area:

Two 55-gallon drums of paint-related waste solvents exhibiting characteristics of ignitability and toxicity for methyl ethyl ketone (EPA waste code: D001). This waste is also listed as non-halogenated solvents for MEK and xylene (EPA waste codes: F003 and F005).

For VSQG waste: Packing of hazardous waste containers were compliant with 40 CFR 262.30 [40 CFR 263.12.

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Containers were observed to be closed, in good condition, and incompatible waste were not placed in the same container [40 CFR 265.172-177]. The facility maintained adequate aisle space between containers in this area [40 CFR 265.35].

Inventory logs:

The facility does not store oily water, used oil, or filters on site. Oily waste is taken to World Petroleum Corporation (EPA ID FLD980709075) on the same day as service.

Contingency Plan and Emergency Procedures:

Although not required for used oil transporters, the facility maintains a full contingency plan on-site. The plan describes the actions that facility personnel must take in order to respond to an emergency, the arrangements made with the local emergency response organizations, lists the names, addresses, and phone numbers of the emergency coordinators, lists all emergency equipment at the facility and the physical location, and includes an evacuation plan. The primary emergency coordinator is Andrew Driessen.

Preparedness and Prevention:

The facility also maintains external and internal alarm systems, fire control, spill control, and decontamination equipment, and automatic sprinkler systems throughout the facility. All alarms and equipment are inspected annually and maintained to ensure proper operation in time of an emergency. All personnel have immediate access to communications and alarm systems in the event of an emergency.

Rebuttable Presumption:

The facility stated that the drivers do not conduct tests prior to receiving used oil or oily water to ensure that the total halogen content of the used oil being transported is below 1,000 parts per million (ppm) [40 CFR 279.44 (a)]. Compliance assistance was offered to begin halogen screening and maintain records of the tests with the nonhazardous manifests for three years [40 CFR 179.44(d) and 62-710.510(g) F.A.C.].

Training:

The facility maintains training records including the type of training, course outlines, and employee signatures [Rule 62-710.600(2)(c) F.A.C.]. All employees receive an initial and annual review of the hazardous waste management procedures relevant to the positions in which they are employed [40 CFR 265.16(a-b)].

Annual Report for used oil and oil filter activities:

Annual reports for the last three years were available for review. The 2022 Used Oil Filter Handlers Annual Report for All Tank Services stated that a total of 156,350 gallons of used oil and 140 used oil filters were managed by the facility.

Conclusion:

ATS was inspected as a transporter of oily water and VSQG of hazardous waste and was found to be out of compliance for the following:

- Failure to 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)].
- Failure to provide a record of analysis (i.e. halogen screening) or specific process knowledge used to ensure the oil and/or oily water is not hazardous waste [40 CFR 279.46(a) and 279.44].

Compliance assistance was provided during the inspection and in the Exit Interview dated 05/11/2023. The facility was provided with a deadline of 05/24/2023 to complete the corrective actions. An extension was granted, and by 06/02/2023, the facility submitted photos and documentation demonstrating that the corrective actions have been completed. The facility has since returned to 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	✓		

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) Exemption Type - Tolling Agreement 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

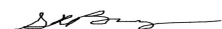
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
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) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information 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

Susan Bryan**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**06/06/2023**Date**Jade Knight**Inspector Name**ES II**Inspector Title**FDEP**Organization**Andrew Driessen**Representative Name**Owner**Representative Title**All Tank Services LLC**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:**06/06/2023