



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

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**FACILITY INFORMATION:**

**Facility Name:** Speedy Oil Environmental LLC

**On-Site Inspection Start Date:** 08/22/2023

**On-Site Inspection End Date:** 08/22/2023

**ME ID#:** 128455

**EPA ID#:** FLR000226332

**Facility Street Address:** 6940C Mission Ln, Fort Myers, Florida 33916-4862

**Contact Mailing Address:** 5680 Pangola Rd, Fort Myers, Florida 33905

**County Name:** Lee

**Contact Phone:** (239) 849-2475

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Pamela S Coffin, Inspector

Other Participants: Genevieve Grah, Environmental Specialist, Joe Snedegar, Authorized Member, Gene Eakins, Vice President

**LATITUDE / LONGITUDE:** Lat 26° 38' 33.472" / Long 81° 49' 57.9065"

**NAIC:** 493190 - Other Warehousing and Storage

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Speedy Oil Environmental LLC (hereinafter, "SOE" or "facility"), located at 6940C Mission Lane, Fort Myers, Lee County, Florida was inspected by the Florida Department of Environmental Protection (DEP or Department) on August 22, 2023 (08/22/2023), 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, 40 CFR Part 273, and 40 CFR 279, adopted and incorporated by reference in Chapters 62-710 and 62-730, Florida Administrative Code (F.A.C.).

Department inspectors were escorted around the facility by Joe Snedegar, Authorized Member. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection. Mr. Snedegar was present throughout the inspection. Walter (Gene) Eakins Jr., Vice President of EOC was also present at the conclusion of the inspection.

**Notification History:**

The facility initially notified and registered with the Department as a used oil and used oil filter transporter and transfer facility in June 2018. The facility was assigned the EPA Identification (EPA ID) Number FLR000226332. The facility's most recent registration was in April 2022 and expired June 30, 2023. At the time of the inspection, registration for the current year had not been received by the Department.

**Inspection History:**

The facility was previously inspected by the Department on 02/13/2018 and the inspection resulted in enforcement actions. The inspection found the facility to be out of compliance for failure to obtain certification from the Department to transport and operate a transfer facility for used oil and used oil filters; failure to provide adequate secondary containment for used oil storage; and failure to properly screen used oil prior to

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acceptance and transport.

Personal Protective Equipment (PPE) was required to enter the facility. Inspectors were equipped with steel-toed boots.

#### **Process Description:**

Lee County Property Appraiser records reflect Edison Oil Company Inc. (EOC) owns the approximate 85,000 sf property. EOC operates a bulk oil storage facility, which includes fourteen (14) aboveground storage tanks (ASTs) registered with the Department (Facility ID 8519437). The tank system was last inspected by Lee County Division of Natural Resources on 04/07/2021 and determined to be in compliance. EOC maintains financial assurance for the tank system and was verified to be current (03/21/2021 to 03/21/2022) at the time of the inspection. EOC maintains a spill prevention, control and countermeasures (SPCC) plan for the site.

SOE leases one 15,000-gallon single-walled aboveground storage tank (#4) from Edison Oil Company (EOC) and operates a used oil and used oil filter transfer facility at this location (photo 1). According to DEP's database and Used Oil Program Coordinator, Janet Ashwood, Speedy Oil Environmental's registration for used oil handler activities at this address expired on June 30, 2023. The facility is currently operating without a valid registration (in violation of 62-710.500(1)(a), F.A.C.). Verbal compliance assistance was provided during the inspection and in the exit interview to immediately notify and register with the Department.

\*Following the inspection, facility representatives provided documentation of re-registration with the Department as a used oil and used oil filter transporter and transfer facility.

The tank system is situated within a concrete block secondary containment structure (photo 2). Gene Eakins, Vice President of Edison Oil Company, confirmed that the secondary containment structure is sealed and painted every 3-5 years, and most recently completed in June 2022. The secondary containment structure is drained of excess water accumulation as necessary by opening the sump valve located near the southwest corner of the structure. According to Mr. Eakins, the containment is drained regularly. Any accumulated water is first visually inspected for sheen or odor and absorbent material used if necessary to prevent oily discharge prior to draining.

Tank #4 is equipped with a gauge to visually determine the tank volume. The tank has a designated fill port and drain port. Directly beneath the ports and within the containment structure is a grated containment tray and metal cover to collect any incidental drips or spills during off/on-loading (photo 3).

Two (2) 55-gallon spill kits are maintained outside the south wall of the containment structure. Inspectors observed three (3) 55-gallon drums for oily wastes/absorbent material. Two of the three drums were full. Mr. Snedegar indicated that Universal Environmental Services LLC (UES) maintains and disposes of this waste.

Used oil is picked up from generators and transferred daily to this facility for consolidation in the 15,000-gallon aboveground storage tank #4 leased from EOC. According to Mr. Snedegar, used oil filters are not stored at this facility. Any used oil filters picked up by SOE from generators are transferred to the unregistered Speedy Oil Recovery LLC transfer facility located at 5680 Pangola Road for storage and eventual pick up by Universal Environmental Services LLC (EPAID: FLR000225029). Verbal compliance assistance was provided during and after the inspection to immediately cease transfer and storage of used oil filters at an unregistered transfer facility. Mr. Snedegar stated that SOE will start transferring used oil filters to the UES transfer location at 2612B Edison Avenue, Fort Myers, FL.

\*Subsequent to the inspection, photo documentation of used oil filter collection containers stored at the UES transfer location on Edison Avenue were provided by the facility on 10/16/2023.

Speedy Oil Environmental utilizes one 3,000-gallon collection truck [Z89 ARB/USDOT# 250706], registered to Speedy Oil Recovery LLC, to transport used oil and used oil filters. Mr. Snedegar indicated there is second collection truck as a back-up if one of the trucks breaks down. The collection truck was at the facility at the time of the inspection (photo 4). The collection truck is equipped with a gated compartment at the back of the truck for transport of used oil filter containers. According to Mr. Snedegar, a leak detector (sniffer) is used at every

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generator location prior to picking up used oil. Mr. Snedegar indicated that if the sniffer detects the presence of halogenated compounds, a Dexsil Chlor-D-Tect test is conducted.

**Records Review:**

Used oil and used oil filter acceptance records for 2023 were reviewed on-site. Additional records were requested via email for inspector review. A handwritten log kept by Mr. Snedegar includes the date of pick up, number of gallons and the halogen reading.

Paper invoices provided to the used oil generator by SOE reflect 'Speedy Oil Environmental LLC, 5680 Pangola Rd., Fort Myers, FL 33905, (239)849-2488, EPA ID# FLR000226332', name and number of used oil generator, quantity of used oil and used oil filters, date, record of halogen screening, and signature of used oil generator. The records do not reflect Speedy Oil Environmental is the actual transporter of the waste.

All pick ups by SOE are recorded in a Driver Transaction database which records the driver name, date of service, customer name and address, invoice number, quantity of oil, oily water, coolant, or oil filters.

Used oil and used oil filter delivery records were not available for review at the time of inspection but provided via email for review. All used oil transferred to the tank at EOC is picked up by Universal Environmental Services LLC. SOE is provided an order number and transaction number from UES through their CORE automated tracking and logistics system. All used oil is shipped by UES to their UES Destination Facility re-refinery in Peachtree City, GA (EPA ID: GAR000020131).

The facility's employee training program was not available at the time of inspection. Mr. Snedegar stated that annual refreshers are not being conducted as he is the only one transporting and completing transfers. It was discussed that in accordance with 62-710.500, F.A.C., a record of training must be kept in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training must be retained for a minimum of three years.

Mr. Snedegar indicated that SWS Environmental Services is contracted to respond to emergency situations. At the time of inspection, the facility had not submitted their registration renewal to the DEP in Tallahassee [in violation of 62-710.600(2)(a)] and was not able to provide evidence of financial assurance in the form of current vehicle insurance by submitting an updated DEP Form 62-730.900(5)(a) Certificate of Liability Insurance for Hazardous Waste Transporters and Used Oil Transporters [in violation of 62-710.600(2)(e)].

\*Immediately following the inspection the facility submitted the proper registration renewal, including DEP Form 62-710.901(3) Form Annual Report by Used Oil and Used Oil Filter Handlers; however, the Department is still awaiting the submittal of a "wet-signed" and completed certificate of liability insurance.

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

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Type: Violation  
Rule: 62-710.500(1)(a)  
Explanation: Used oil transporters and transfer facilities are required to annually register their used oil handling activities with the Department. At the time of inspection, the facility had not renewed its registration with the Department.  
Corrective Action: The facility must immediately register its used oil handling activities with the Department, providing the following forms are accurately completed and submitted: DEP Form 62-730.900(5)(a) State of Florida Certificate of Liability Insurance for Hazardous Waste Transporters and Used Oil Handlers, DEP Form 62-730.900(1)(b) 8700-12 Florida Notification of Regulated Waste Activities (including the Certification Statement), DEP Form 62-710.901(3) Used Oil and Used Oil Filter Handlers Annual Report; the facility demonstrates compliance with annual reporting and record keeping requirements; has an annual and new employees training program in place and demonstrates all employees have received training, and submits \$100 registration fee.

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Type: Violation  
Rule: 62-710.600(2)(b), 62-710.600(2)(c)  
Explanation: Used oil transporters must submit a certification of an annual and new employee training program showing evidence of familiarity with applicable state laws and rules governing used oil transportation. At the time of inspection, the facility could not provide documentation of a training program or training logs.  
Corrective Action: Please provide the Department with employee training logs showing the facility provides adequate training covering the applicable rules for used oil transportation.

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Type: Violation  
Rule: 62-710.600(2)(e)1.a  
Explanation: A used oil transporter must provide updated liability insurance documentation. At the time of inspection, the facility had allowed its registration to lapse and as a result, valid and current liability insurance documentation was not submitted to the Department.  
Corrective Action: Please provide the Department with an updated DEP Form 62-730.900(5)(a) Certificate of Liability Insurance for Hazardous Waste Transporters and Used Oil Transporters.

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**PHOTO ATTACHMENTS:**

Photo 1 Tanks



Photo 2 Secondary containment



Photo 3 Drain and fill ports



Photo 4 Collection truck



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### Conclusion:

The Speedy Oil Environmental facility was inspected as a used oil and used oil filter transporter and transfer facility and was found to be out of compliance for failure to register used oil handling activities with the Department. The facility was also found to be out of compliance for failure to maintain a training program which includes provisions for compliance with state and federal rules governing used oil, proper used oil management practices, including appropriate response action to any release or spill, a detailed description of the company's standard operating procedure for halogen screening at each pick up location, an introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle, and documentation that company personnel handling or transporting used oil have successfully completed the training program.

On August 28, 2023, the facility submitted the applicable documentation for renewal and registration of used oil handling activities; however, it was found to be incomplete and additional information and re-submittal of updated insurance documentation was requested.

On 10/05/2023, the facility submitted the DEP Form 62-730.900(5)(a), Florida Certificate of Liability Insurance. The insurance form submitted did not have an original "wet" signature and the facility was asked to submit a revised, updated insurance form by 10/30/2023. The facility provided the updated form on 10/16/2023.

At this time, documentation of the facility's employee training program and logs is still pending receipt from the Department. The facility has not returned to compliance and will be issued a Compliance Assistance Offer letter as a result of this inspection.

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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

Pamela S Coffin  
**Principal Investigator Name**

Inspector  
**Principal Investigator Title**

  
**Principal Investigator Signature**

DEP  
**Organization**

10/19/2023  
**Date**

Genevieve Grah  
**Inspector Name**

Environmental Specialist  
**Inspector Title**

DEP  
**Organization**

Joe Snedegar  
**Representative Name**

Authorized Member  
**Representative Title**

Speedy Oil Environmental  
**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.

Gene Eakins  
**Representative Name**

Vice President  
**Representative Title**

Edison Oil Company  
**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:** Pamela S Coffin

**Inspection Approval Date:** 10/19/2023