



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

FACILITY INFORMATION:

Facility Name: Associated Waste Services Corp

On-Site Inspection Start Date: 10/16/2023

On-Site Inspection End Date: 10/16/2023

ME ID#: 125253

EPA ID#: FLR000223313

Facility Street Address: 7400 NW 77th Ter, Medley, Florida 33166-7503

Contact Mailing Address: 7400 NW 77th Ter, Medley, Florida 33166-7503

County Name: Miami-Dade

Contact Phone: (786) 631-2210

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jade Knight, Inspector

Other Participants: Naquita DAndrade, Environmental Specialist II, Larry Rodriguez, President

LATITUDE / LONGITUDE: Lat 25° 50' 38.2308" / Long 80° 19' 11.136"

NAIC: 484110 - General Freight Trucking, Local

TYPE OF OWNERSHIP: Private

Introduction:

On October 16, 2023 (10/16/2023), Jade Knight with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Evaluation Inspection at Associated Waste Services Corp (AWS), located at 7400 NW 77th Ter, Medley, FL 33166. AWS 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 and 279, adopted and incorporated by reference in Rule 62-730 and 62-710, Florida Administrative Code (F.A.C.). The inspector was accompanied by Naquita DAndrade, Environmental Specialist II from the FDEP.

The inspectors were escorted around the facility by Larry Rodriguez, AWS President. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

AWS occupies 15,000 square footage and is connected to Medley's water and sewer. AWS took over the facility in September 2023, but same operations have been occurring in this location since June 2021. AWS employs 6 staff. The facility operates Monday through Friday from 7 a.m. to 3 p.m.

Notification History:

AWS initially notified with the Department as a Mercury Handler on 06/08/2017, a Used Oil Handler on 06/14/2017, and a Hazardous Waste Transporter on 06/14/2017. The facility was assigned the EPA Identification (EPAID) Number FLR000223313. The facility most recently notified as a Very Small Quantity Generator (VSQG) of hazardous waste, Used Oil Transporter & Transfer Facility (UOT & UOF), Used Oil Filter Transporter & Transfer Facility, and Universal Waste Mercury Transporter, and Hazardous Waste Transporter on 08/22/2023. Attached to latest notification form was AWS's Annual Report and Evidence of Liability Insurance on 04/25/2023 and is valid until 07/01/2024.

Inspection History:

Inspection Date: 10/16/2023

The facility was previously inspected by the Department on 03/18/2021 as a VSQG, UOT & UOF, Used Oil Filter Transporter & Transfer Facility, and Universal Waste Mercury Transporter and was found to be out of compliance at the time of inspection. The following violation was cited: failing to label used oil filter containers with the words "Used Oil Filters" (62-710.850(5)(a) F.A.C.). The violation was resolved on 04/15/2021.

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

Process Description:

Associated Waste Services (AWS) operates as a general freight trucking facility (NAICS Code 484110). Facility used to be operating under Emaxx as a transporter of used oil and used oil filters, as well as marketers for new oil. However, AWS does not operate the new oil tanks and only shares the warehouse and parking lot with Bravo. Bravo is a company that transports new oil. AWS's trucks are stored and restocked at this site. Facility has four trucks that are used to transport used oil, used oil filters, mercury containing devices, and hazardous waste. Used oil is not stored on-site however, the facility chooses to maintain its used oil and used oil filter transfer facility status in case they practice this activity in the event the trucks cannot transport to designations. Waste generated on-site and transported have EPA waste characteristics Ignitability (D001), Corrosive (D002), Cadmium (D006), Chromium (D007), Lead (D008), Spent Halogenated Solvents - Degreasing (F001), Spent Halogenated Solvents - Other (F002). AWS shares the space and has small sections inside they use and operate from. The areas are the offices, one shelf in warehouse, partial space near bay door, and parking lot.

Offices:

Located at the front right of the warehouse, with a parking lot for guests and employees. Parking lot loops around the length and left side of the warehouse. Trucks used for operations are only stored on the back left of the parking lot. Documents, tests kits, absorbent pads, spill kit for mercury cleanup, and test samples from used oil collection were observed inside the offices.

Warehouse:

Located on the left side of the building. On the right side is a new oil tank farm that consists of ten 10,000-gallon above ground storage tanks and owned by Bravo. AWS has one shelf in the middle for absorbent supplies for emergencies and restocking the trucks. On the right back side of the warehouse was a small space by the bay door to store a small forklift and empty drums. On the back left was the following:

- One 500-gallon red tank, labeled with the words "Used Oil Services" within a secondary containment.
- One 500-gallon black tank, labeled with the words "Used Oil Services" within a secondary containment.
- One 55-gallon plastic drum with a closed funnel on top, labeled "Used absorbents / Rags".

Tanks are only used when facility services Bravo. No hazardous waste was observed on-site. An eyewash station, fire extinguisher, Safety Data Sheets (SDS), and spill kit materials were observed in this area.

Parking lot:

Located on the back left side of the building, near the bay doors. Facility has four trucks:

- One small box truck for primarily used oil filters.
- One large box truck for hazardous waste and universal waste.
- Two 4,000-gallon tank truck for used oil. At the time of the inspection one of the tank trucks was getting a checkup and not operating.

All trucks had DOT placards with "USDOT 3056263" on the side of all trucks, "AWS-Associated Waste Services", contact number, and "Used Oil Services / Hazardous Waste Disposal". Every truck contains spill control materials. All transporters keep copies of the permits, notifications, contingency plan (in case of emergency) and manifests on the truck.

Records Review:**Manifests:**

AWS does not accept hazardous waste from a generator unless they are provided with a manifest form (EPA form 8700-22, and if necessary, EPA Form 8700-22A) signed by the generator and transporter with date of

Inspection Date: 10/16/2023

pickup. [40 CFR 263.20(a)(1)]. The facility maintains a copy of the manifest signed by the generator, himself, and the next designated transporter or the owner or operator of the designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter. [40 CFR 263.22(a)]. Records for 2021, 2022, and 2023 were available for review during the inspection.

Based on the manifest records, the facility operates as a transporter of hazardous waste and does comply with the 24-hour time limit for hazardous waste storage [40 CFR 263.12(a), Rule 62-730.171(2)(a) F.A.C.]. During the records review, inspectors observed the latest hazardous waste manifest in compliance with the 24-hour storage period:

- Manifest tracking number 018522885FLE documents that the transporter accepted hazardous waste from Sintavia (EPAID: FLR000234000) on 10/09/2023 and delivered to the second transporter Triumvirate Environmental Services (EPAID: FLD901010773) on 10/09/2023.
- 2 DM containers with 900-pounds of "UN3077, Waste Environmentally Hazardous Substance, Solid, N.O.S. g, III (Aluminum, Chromium) RQ: (D007)". EPA Waste Code: D007.

Most recent Non-Hazardous Waste Manifest review on-site had the following:

- Manifest tracking number NHWM 233403-0722 documents that the facility Associated Waste Services (EPAID: FLR000223313) generated and transporter waste on 10/09/2023 and delivered to the designated facility Cliff Berry (Miami) (EPAID: FLD058560699) on 10/09/2023.
- 1 TT container with 110-gallons of "Non-DOT/ Non-RCRA Regulated Waste (Liquid) (Wastewater)".
- 1 TT container with 2035-gallons of "Non-DOT / Non-RCRA Regulated Waste (Liquid) (Used Oil)".
 - o Noted in Special Handling Instructions was 18.6 % H₂O and <1000ppm Halogens.

AWS does not accept Used Oil unless it passes a Robinair TIFRX-1A Automatic Halogen Leak Detector for the testing of used oil halogen content. If the load does test over 1000 ppm for halogens, the transporter uses Dexsil Clor-D-TEGT test to verify. If the test results over 1000 ppm, the used oil is rejected at the generator facility.

Transportation Authorization:

The facility maintains a copy of the authorization to transport hazardous waste in all vehicles that transport hazardous waste, per Rule 62-730.170(2)(g).

Rejected Loads:

The facility has been unable to deliver hazardous waste to the designated facility because the waste was rejected while the transporter was on facility premises. Facility did have one case due to faulty test where designation facility tested used oil and received a result of >1000ppm Halogens but was retested with a Dexsil Clor-D-TEGT test and second test result was <1000ppm Halogens. Facility kept original manifest, documentation of rejection, second test analysis of load, and final manifest of acceptance by designated facility.

Testing was done through Summit Environmental Technologies Inc – Analytical Laboratories for sample collected on 09/28/2023. The analytical report was dated 10/03/2023 and was requested through designation facility Cliff Berry Inc as a Rebuttable Presumption of Used Oil. The following was included in the report:

- Halogens Analysis by X-Ray (9075): Chlorine, Total = 286ppm. Dated 10/02/2023.
- PCB Analysis for Oils (8082): Total PCBs <1.00ppm and 84.6% Tetrachloro-m-xylene (within the 67.8-130 recommended %). Dated 10/03/2023.

Certificate of Liability Insurance:

The facility does maintain financial responsibility for sudden accidental occurrences in a minimum amount of \$1,000,000.00 per occurrence for combined coverage of injury to persons and for damage to property and the environment from the spillage of hazardous 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 is insured by ACORD Insurance Company under policy number EPK-139653. This insurance coverage is in effect from 05/08/2023 to 05/08/2024. The coverage applies at sudden accidental occurrences and limits of liability are \$1,000,000 each

Inspection Date: 10/16/2023

occurrence and \$2,000,000 annual aggregate.

Contingency Plan and Emergency Procedures:

The facility maintains a full contingency plan on-site [Rule 62-730.171(4)(a); 40 CFR 265.53(a)] and includes the Spill Prevention Control & Countermeasure (SPCC) and Operation Plan for Mercury Containing Devices. 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 [40 CFR 265.52]. The primary emergency coordinator is Larry Rodriguez, AWS President [40 CFR 265.55]. The facility has never been required to implement the contingency plan.

Preparedness and Prevention:

The facility maintains external and internal alarm systems, fire control, spill control, and decontamination equipment, and automatic sprinkler systems throughout the facility [40 CFR 265.32]. All alarms and equipment are inspected periodically and maintained to ensure proper operation in time of an emergency [40 CFR 265.33]. All personnel have immediate access to communications and alarm systems in the event of an emergency [40 CFR 265.34].

Training:

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)]. The facility maintains the required job descriptions and list of personnel that are handling hazardous waste [40 CFR 265.16(d)]. Additionally, all personnel have the following trainings: DOT Hazmat and Safety & Emergency Procedures.

PHOTO ATTACHMENTS:

Eyewash Station



Absorbent Material



Red 500-gallon Used Oil Tank



Black 500-gallon Used Oil Tank



55-gallon Drum of Used Oil Absorbents / Rags



Used Oil Samples



Conclusion:

Associated Waste Services Corp was inspected as a Very Small Quantity Generator (VSQG), Hazardous Waste Transporter (TRA), Used Oil & Used Oil Filter Transporter & Transfer Facility (UOT) and was found to be In Compliance.

An exit interview was sent on 10/20/2023 and provided a deadline of 11/03/2023 to submit requested documentation. On 11/03/2023 the facility submitted all documentation and answers to The Department confirming that the facility was In Compliance.

An In Compliance Letter will be sent to the facility.

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

Inspection Date: 10/16/2023

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)	✓		

Inspection Date: 10/16/2023

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

Jade Knight**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**11/30/2023**Date**Naquita DAndrade**Inspector Name**Environmental Specialist II**Inspector Title**FDEP**Organization**Larry Rodriguez**Representative Name**President**Representative Title**AWS**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:**Johanna Polycart**Inspection Approval Date:**11/30/2023