



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

FACILITY INFORMATION:

Facility Name: January Environmental Services Inc

On-Site Inspection Start Date: 12/09/2022

On-Site Inspection End Date: 03/13/2023

ME ID#: 46304

EPA ID#: FLD982162943

Facility Street Address: 1920 Hwy 60 W Main St, Bartow, Florida 33830-0000

Contact Mailing Address: 1920 Highway 60 West, Bartow, Florida 33830

County Name: Polk

Contact Phone: (863) 534-8478

NOTIFIED AS:

Non-Handler

WASTE ACTIVITIES:

Generator: Non-Handler **TSD:** Operating Non-Commercial TSD **Used Oil:** Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility Facility

Routine Inspection for Used Oil Processor Facility

INSPECTION PARTICIPANTS:

Principal Inspector: David S Petti, Inspector

Other Participants: Leslie Pedigo, Environmental Consultant, Neil Lakhlani, Director/Brooker, Chris Sappington, VP of Operations, Tom Putman, Manager

LATITUDE / LONGITUDE: Lat 27° 53' 51.5901" / Long 81° 51' 47.2672"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

January Environmental Services (January) was inspected on December 9, 2022, to determine the facility's compliance with used oil transporter and transfer facility rules and to document closure activities. The facility was originally notified as a small quantity generator on March 25, 1988, under the name Ashland Chemical Company. In 2004, January submitted notification as a Used Oil Transporter, Transfer Facility, Marketer and Filter Transporter. The Department has conducted numerous Hazardous Waste inspections of this facility, most recently on April 12, 2022. Neil Lakhlani, Director/Brooker, GeoTech Environmental Inc.; Chris Sappington, VP of Operations, Global Environmental and Industrial Response, LLC (Global); and Tom Putman, Manager, Global; accompanied the inspectors during the inspection.

Process Description:

January was a used oil, used oil filter and oily waste transporter and storage facility and a wastewater transporter. The facility is located on a 5.18-acre property that was purchased by January Transport, Inc., on October 20, 2004. The facility consisted of a 5,414 square foot building which houses offices, a laboratory and warehouse; a used oil tank farm; and a rail spur. Prior to closure, the facility had one part-time administrative employee, one driver working from this location, and was open from 8 a.m. to 5 p.m., Monday through Friday. The City of Bartow provided sewer and potable water services.

RECENT COMPLIANCE/PERMIT/ENFORCEMENT HISTORY

- December 17, 2017: January's most recent used oil processor permit (307171-HO-004) was issued; this permit expired on December 7, 2022. While the facility had not processed used oil since 2017, the permit was required to allow the facility to store used oil on site for more than 35 days. January was required to submit the permit renewal application to the Department by no later than February 16, 2022, 60 days prior to the permit expiration date.

Inspection Date: 12/09/2022

- December 9, 2021: The Department issued a permit renewal reminder letter.
- March 25, 2022: Division requests an inspection of January based on the permit renewal not being submitted.
- April 12, 2022: Compliance Evaluation Inspection documented the following violations:
 - The Permit renewal paperwork was not submitted at least 60 days prior to the permit expiration date as required by Rule 62-710.800(4), F.A.C.
 - The Annual Used Oil Transporter/Transfer Facility registration had not been timely submitted as required by Rule 62-710.500(1), F.A.C. and Rule 62-710.500(2), F.A.C.
 - The Annual Used Oil Filter Transporter/Transfer Facility registration had not been timely submitted as required by Rule 62-710.850(3), F.A.C.
 - The Annual Report by Used Oil and Used Filter Handlers had not been timely submitted as required by Rule 62-710.510(5), F.A.C.
 - Verification of employee training was not available, as required by 62-710.600(2)(c), F.A.C.
- April 11, 2022: Initial Permit Renewal documents were received (Closure Cost Estimate).
- April 15, 2022: The Renewal Application and 60-day Extension Request received.
- April 22, 2022: Warning Letter number WL22-47HW53SWD was issued, and the final April 12, 2022, Compliance Evaluation Inspection was attached. A response was due by May 11, 2022.
- April 26, 2022: The First Request for Additional Information for the Permit Application letter was issued by the Department. Response due by June 25, 2022.
- May 12, 2022: Warning Letter reminder email sent to January requesting that a meeting be scheduled; response due not later than May 16, 2022.
- May 27, 2022: January submits the Driver Training Records.
- May 31, 2022: The Department sends potential Warning Letter meeting dates to January.
- June 1, 2022: The Department issues the Annual Florida Used Oil/Used Oil Filter Transporter, Used Oil/Used Oil Filter Transfer Facility, and Used Oil Processor Registration Letter to January; the registration year runs from June 1, 2022, through June 30, 2023.
- June 2, 2022: The Department issues an email setting a Teams Meeting for June 23, 2022.
- June 23, 2022: Enforcement Meeting held. Either a Short Form Consent Order (if the permit renewal is quickly completed) or a Long Form Consent Order will be issued.
- June 27, 2022: Additional Permit Renewal documents submitted to the Department.
- July 21, 2022: The Second Request for Additional Information for the Permit Application letter was issued by the Department. Response due by September 19, 2022.
- September 14, 2022: Permit Renewal Teams Meeting held.
- September 16, 2022: January's consultant requests a 30-day extension to submit revised Permit Renewal documents.
- September 21, 2022: The Department grants the extension to submit revised Permit Renewal documents until October 21, 2022.
- On October 20, 2022: The Department received notice via email that January does not intend to renew their Used Oil Processing Facility permit.
- November 16, 2022: The Department issues an email stating that due to the permit not being renewed, the Facility is now subject to the facility Closure Conditions of Permit 307171-004-HO/307171-005-SO:
 - The owner or operator shall notify the Department in writing at least 60 days prior to the scheduled date of closing the facility and
 - Within 30 days after closing the facility, the owner or operator shall submit a certification of closure completion to the Department which demonstrates that the facility was closed in substantial compliance with the detailed closure plan.
- December 1, 2022: The Department received notice via email that January is in the process of selling the property to Global Environmental and Industrial Response, LLC. The Department agrees to conduct an inspection of the facility on December 9, 2022, to verify the current condition of the facility.
- December 7, 2022: The Department sent an email stating that proper closure under Permit 307171-004-HO /307171-005-SO would need to be completed and that the prospective purchaser would need to apply for a new permit once they obtained control of the property.

DECEMBER 9, 2022, SITE INSPECTION

Inspection Date: 12/09/2022

Previously, the facility picked up waste products (wastewater, used oil and used oil filters) from its customers. Used oil was collected from customers in the facility's used oil truck or the two tanker trailers and was pumped into the used oil aboveground storage tanks (ASTs) using the overhead used oil loading rack adjacent to the railroad spur. Used oil brought back to the facility in smaller containers was also pumped into the used oil ASTs. The two used oil tanker trailers were also used to transport the used oil to used oil processing facilities. January did not accept used oil or oily water from other transporters nor collect public used oil. Used oil filters that were brought back to the facility in smaller containers were consolidated into large metal bins and stored on-site prior to transportation for final treatment and disposal. The facility was under contract with Aqua Clean Environmental Company (EPA ID #FLR000193466) to transport wastewater; wastewater was not brought back to the facility but transported directly to Aqua Clean Environmental Company for processing. All collection operations had ceased prior to the inspection.

Laboratory

No wastes were present in the on-site laboratory.

Waste Storage Inside the Warehouse Building

All waste had been removed from the Warehouse building. See attached photos.

Used Oil Process Tanks

The two process tanks that were part of the former used oil processing plant were confirmed to be empty.

Registered Aboveground Storage Tanks

The final load of flowable used oil had been removed from the six white 24,000-gallon aboveground used oil storage tanks (ASTs) on the morning of the inspection. A receipt for the final 6,500 gallons, removed on the morning of December 9, 2022, was provided via email on December 12, 2022, and is attached; this load was transported to the January facility in the January Recycling Facility located at 4300 SW 36th Street, Oklahoma City, Oklahoma. The manways near the bottom of the tanks were open to allow for the inspection; residual oily sludge was still present in the bottom of each tank (see attached photos). The containment around the tank farm was in good condition, did not contain any free liquids, and appeared to be adequate to contain the volume of the tanks. These ASTs are registered with the Department's Storage Tank Program, facility ID # 53/9101026. Based on discussions with Global, these tanks will be reused by Global moving forward.

Other Storage Tanks Located Outside

A green AST has been installed in a separate containment area attached to the existing containment; at the time of the inspection this tank was empty. A second green AST and one silver ASTs were observed laying on their sides in the yard west of the tank farm; all three were empty.

Vehicles

None of the vehicles previously used by January were present at the time of the inspection.

FACILITY CLOSURE

- December 30, 2022: Closure Plan submitted to the Department on behalf of January.
- January 24, 2023: The Department's Closure Plan review comments were issued to January.
- January 26 and 27, 2023: Revised Closure Plan submitted to the Department on behalf of January.
- February 1, 2023: Proposed Long Form Consent Order #23-0013 was issued to January.
- February 3, 2023: Proposed Long Form Consent Order #23-0013 was re-issued to January to correct a small typo.
- February 3, 2023: Signed Long Form Consent Order #23-0013 was received by the Department.
- February 7, 2023: Long Form Consent Order #23-0013 was executed and sent to January.
- February 7, 2023: Closure Plan approved by the Department.
- March 6, 2023: Facility Closure Report received by the Department.

Inspection Date: 12/09/2022

- March 13, 2023: Long Form Consent Order #23-0013 penalty payment made through the Department 's web portal.
- March 13, 2023: Closure Report approved by the Department.

PHOTO ATTACHMENTS:

Warehouse - all wastes removed



Warehouse - all wastes removed



Warehouse - all wastes removed



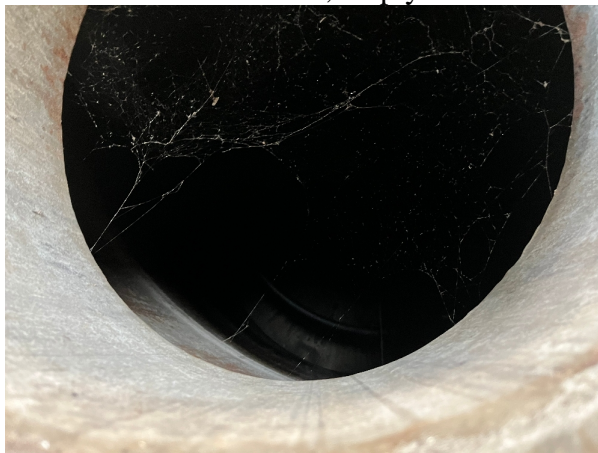
Warehouse - all wastes removed



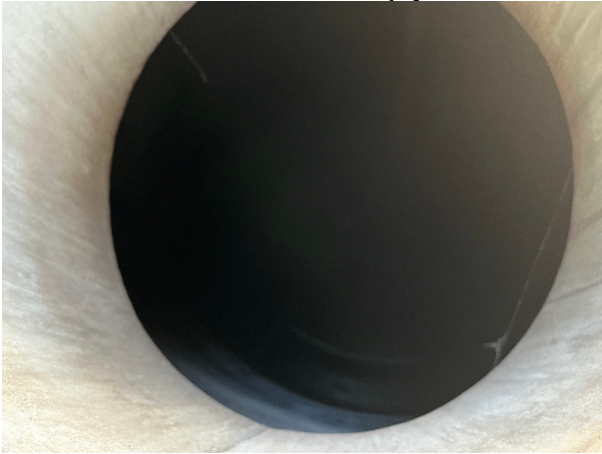
Warehouse - all wastes removed



1st of two Process Tanks, empty



2nd of two Process Tanks, empty



Tank #101 - used oil removed, oily sludge present



Tank #102 - used oil removed, oily sludge present



Tank #103 - used oil removed, oily sludge present

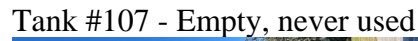


Tank #104 - used oil removed, oily sludge present



Tank #105 - used oil removed, oily sludge present





JANUARY Environmental Services Invoice #ET NC 8409 TRUCK # 353 TR # 187 Driver: <u>36272</u> Service Address <u>January Environmental</u> <u>1940 60th W</u> <u>Bellevue, WA 98003</u>		1800 Hwy 60 West Burien, WA 98148 1-800-879-2010 www.JanuaryEnvironmental.com Date of Service <u>12/09/2022</u> Bill To Address		EPA# FL0621623
Customer Name <u>8631, 534, 8478</u> Customer Phone Number <u>8631, 534, 8478</u>		Amount Due <u>650.00</u> Check #		Project #
EPA# <u>8631</u> Service <input type="checkbox"/> Used Oil (Per USED OIL/Generator Material) <input type="checkbox"/> Used Antifreeze <input type="checkbox"/> Used Oil Drums (25 Gallon Drums) <input type="checkbox"/> Other Brk. <input type="checkbox"/> Used Absorbents <input type="checkbox"/> Other Brk. <input type="checkbox"/> Used Oil Water Mix (Water %) <input type="checkbox"/> Other Oil <input type="checkbox"/> Parts/Strainer Services <input type="checkbox"/> Spill Kit <input type="checkbox"/> Empty Drums <input type="checkbox"/> Dripped Oil <input type="checkbox"/> (Picked Up) <input type="checkbox"/> Used Grease Drums <input type="checkbox"/> Seal Off Drums <input type="checkbox"/> Containers Dripped Oil <input type="checkbox"/> 55 Gall. <input type="checkbox"/> Other Brk. <input type="checkbox"/> (Tide or Tank)		PAID Total		PAID Total
Prices Does Not Include Application Tax		Alternate Recycling Facility		PAID Total
Signature _____		Date _____		PAID Total
Customer Signature _____		Date _____		PAID Total
JES Rep _____		Holcom Tech _____		PAID Total
(Please Remit all Payments To)		2701 South Parkway		Channah Valley, TN 37219

Conclusion:

Based on the review of Closure Report dated March 6, 2023, the facility was compliance with state and federal used oil/used oil filter transfer, transporter, and processor closure requirements.

Inspection Date: 12/09/2022

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: 12/09/2022

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

David S Petti**Principal Investigator Name**Inspector**Principal Investigator Title**David Petti**Principal Investigator Signature**DEP**Organization**01/05/2024**Date**Leslie Pedigo**Inspector Name**Environmental Consultant**Inspector Title**FDEP**Organization**Neil Lakhani**Representative Name**Director/Broker**Representative Title**GeoTech Environmental Inc.**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.

Chris Sappington**Representative Name**VP of Operations**Representative Title**Global Environmental and
Industrial Response, 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.

Inspection Date: 12/09/2022

Tom Putman
Representative Name

Manager
Representative Title
Global Environmental and
Industrial Response, 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: Michael Miller

Inspection Approval Date: 01/08/2024