



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

FACILITY INFORMATION:

Facility Name: EnviroServe Inc dba EnviroServe Logistics

On-Site Inspection Start Date: 03/27/2024

On-Site Inspection End Date: 03/27/2024

ME ID#: 156501

EPA ID#: FLR000260695

Facility Street Address: 5313 Hartford St, Tampa, Florida 33619-6819

Contact Mailing Address: 4600 Brookpark Road, Cleveland, Ohio 44134

County Name: Hillsborough

Contact Phone: (216) 642-1311

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: David Petti, Inspector

Other Participants: Coral Evans, Environmental Specialist II, Talitha Wesson, Operations Manager, Mike Samelak, Environmental Quality Manager

LATITUDE / LONGITUDE: Lat 27° 54' 41.5008" / Long 82° 23' 36.852"

NAIC: 484230 - Specialized Freight (except Used Goods) Trucking, Long-Distance

TYPE OF OWNERSHIP: Private

Introduction:

EnviroServe was inspected by the Florida Department of Environmental Protection (Department) on March 27, 2024, to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility notified as a Non-Handler of Hazardous Waste/Used Oil Transporter (UOT) and was granted the current EPA ID # on August 15, 2023. EnviroServe has not previously been inspected by the Department. The inspector was accompanied throughout the inspection by Talitha Wesson, Operations Manager.

Process Description:

EnviroServe operates thirty-seven facilities nationwide with their corporate office in Cleveland, Ohio, and has been operating at this location since 2021. The facility employs eleven individuals and operates from 8:00 AM to 5:00 PM Monday through Friday. This facility uses standard fluorescent bulbs for lighting which are serviced by their landlord. The facility uses City of Tampa Utilities for sewer and water. EnviroServe has one propane powered forklift whose maintenance is contracted out to a third party. This EnviroServe location has one semi tanker tractor and trailer, one vac truck, one roll-off truck, and one box truck. All are serviced off-site.

EnviroServe is involved in a variety of remediation activities including spill clean-up, drum pick-ups and tank cleanout. EnviroServe provides waste management services to a variety of industrial clients. Their service for these clients includes waste profiles, waste pickup and disposal. Some of their clients waste is taken to EnviroServ's Mulberry, Florida, facility, such as liquid wastes, where they are combined with a variety of media to harden them before being disposed of. No waste is stored on-site at this facility. The majority of the waste handled by this location is non-regulated waste.

RECORDS REVIEW

- Used Oil acceptance Records

The facility was able to provide three years of waste records and invoices which showed that they have been

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using an Ohio registered EPA ID number tied to their corporate office in Cleveland. All nationwide EnviroServe locations have been using the Ohio registered EPA ID number. The facility in Tampa continues to use the Ohio EPA ID number even after they were granted their own Florida EPA ID number. Department records show the facility's corporate office was notified on August 15, 2023, by letter that states: "effective immediately you are no longer authorized to transport, or market used oil, or used oil filters, or burn off-specification used oil, in the State of Florida under this (Ohio) EPA ID number."

Records are kept on all service calls and retained work orders include UO generator information, quantity of UO, and shipment date.

- Used Oil Delivery Records

Records were reviewed and appeared to be complete. The facility has had one shipment of used oil since opening at this address. This shipment occurred on September 27, 2023, for 1,265 gallons of used oil. This shipment was transported to Aqua Clean Environmental [EPA ID# FLR000034033].

This shipment was in violation as it was manifested using the Ohio EPA ID number. The facility has provided a statement that says "going forward we will be using the EPA ID number assigned by FDEP in the permit, FLR000260695, on all hazardous waste manifests, used oil/used oil filter manifests and universal waste manifests transported by the EnviroServe Tampa location."

- Annual Report

The facility's annual report was submitted as required.

- Training

The branch manager most recently received the RCRA course on November 8, 2023. The facility was unable to produce training records for the rest of facility personnel. The facility provided the required training on April 10 & April 11, 2024, and provided the Department with the required training records for all personnel. Moving forward the facility shall have an annual and new employees training program in place covering the applicable rules.

- Rebuttable Presumption Records:

The facility failed to test the used oil in the September 27, 2023, shipment for halogens. However; the facility was able to get confirmation from the generator (Invacare) that they did not use chlorinated solvents in any of their processes. Moving forward the facility shall implement a testing regime for halogen content for all used oil shipments.

- Proof of Liability Insurance

Records of the facility's Used Oil Handler Certification of Liability Insurance forms were submitted as required.

- Fleet

The fleet vehicles used to transport used oil are adorned with the proper DOT placards and have their used oil registration inside.

- Registration Displayed

The facility displays a valid registration form and identification number in a prominent location inside the facility.

FACILITY STATUS

EnviroServe is notified as a Non-Handler of Hazardous Waste/Used Oil Transporter and is operating as such.

New Potential Violations and Areas of Concern:

Violations

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Type: Violation
Rule: 279.44(a)
Explanation: The facility failed to test the used oil in the September 27, 2023, shipment for halogens. 40 CFR 279.44(a) states: To ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.
Corrective Action: Corrected: The facility was able to get confirmation from the generator (Invacare) that they did not use chlorinated solvents in any of its processes. The facility provided a statement that says; Moving forward, we will be instituting the use of Chlor-D-Tect 1000 Halogen test kits for field testing of Used Oils at pickup. There will be documentation of the test result that will be kept on file as well as a picture of the test result taken in the field and kept on file.

Type: Violation
Rule: 62-710.500(1)
Explanation: The facility in Tampa has continued to use the Ohio EPA ID number even after they were granted their own Florida EPA ID number. Department records show the facility was notified on August 15, 2023, by letter, that "effective immediately you are no longer authorized to transport, or market used oil, or used oil filters, or burn off-specification used oil, in the State of Florida under this (Ohio) EPA ID number."
62-710.500(1)(a) F.A.C. states in part: The following persons shall annually register their used oil handling activities with the Department.
(a) Used oil transporters
Corrective Action: Corrected: The facility provided the Department a statement, via email, that stated: "Additionally, going forward we will be using the EPA ID number assigned by FDEP in the permit, FLR000260695, on all hazardous waste manifests, used oil/used oil filter manifests and universal waste manifests transported by the EnviroServe Tampa location."

Type: Violation
Rule: 62-710.600(2)(c)
Explanation: The facility was unable to produce personnel training records required of used oil transporters.
62-710.600(2)(c) F.A.C. states: Maintain a record of training 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. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections;
Corrective Action: Corrected: The facility provided the required training on April 10 and April 11, 2024 and provided the Department with the required training records for facility personnel..

PHOTO ATTACHMENTS:

General shot of wharehouse



Conclusion:

At the time of the inspection EnviroServe was not in compliance with rules and regulations applicable to UOT's. However, the facility has since returned to compliance by correcting the violations identified during the 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

David Petti
Principal Investigator Name

Inspector
Principal Investigator Title

David Petti

Principal Investigator Signature

DEP
Organization

04/22/2024
Date

Coral Evans
Inspector Name

Environmental Specialist II
Inspector Title

FDEP
Organization

Talitha Wesson
Representative Name

Operations Manager
Representative Title

EnviroServe
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.

Mike Samelak
Representative Name

Environmental Quality Manager
Representative Title

EnviroServe
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: 04/23/2024