

From: [Knight, Jade](#)
To: [Florida Emergency Cleaning](#)
Cc: [Luong, Shelby](#)
Subject: Exit Interview - Nathan Todds OCD Cleaning LLC dba FL Emergency Cleaning (FLR000262535)
Date: Tuesday, August 13, 2024 2:28:00 PM

Good Afternoon,

This email serves as a follow up to the hazardous waste compliance evaluation inspection conducted on August 7th, 2024 (08/07/2024) by the Florida Department of Environmental Protection (FDEP). We appreciate your team for taking the time to conduct the walkthrough of Nathan Todds OCD Cleaning LLC dba FL Emergency Cleaning [FLR000262535] (hereinafter referred to as NTEC or Facility) located at 5755 SW Savage St, Palm City, FL 34990. As discussed during the inspection with facility representatives, NTEC is required to submit the following documentation/information to the Department:

- What is the square footage of the facility?
- How many employed staff?
- When did the facility begin operating at this location?
- What are the times of operations?
- Used oil receipts were observed on-site. Provide used oil manifests or receipts from Safety-Kleen for further review.
- Photo of testing tool and provide what types of test it conducts.
 - Waste determinations and test for hazardous waste
 - Halogen testing <1,000 ppm for used oil
- Facility has exceeded the 24hr time limit for transporting used oil. Either confirm that hence further the facility will ensure they meet the 24hr time limit or will renotify as a transfer facility and meet transfer facility regulations.
- Documentation of trainings including Hazwoper for all employees who will manage or handle hazardous waste or used oil.
- Does the facility maintain a contingency plan or a Spill Prevention, Control & Countermeasure (SPCC) Plan? If so, provide it for review.

Requested guidance documents by representative:

- Hazardous Waste Transporter & Transfer Facility [40 CFR 263 & 62-730 F.A.C.]:
 - Forms regarding Hazardous Waste transportation: Notification, Certification, Financial Assurance & Responsibility, Certificate of Liability Insurance.
 - <https://floridadep.gov/waste/permitting-compliance-assistance/content/forms-chapter-62-730-hazardous-waste>
 - Hazardous Waste & Universal Waste Transporter Information and Forms:
 - <https://floridadep.gov/waste/permitting-compliance-assistance/content/transporters-hazardous-and-universal-wastes>
 - Hazardous Waste Regulations under RCRA:
 - <https://floridadep.gov/waste/permitting-compliance-assistance/content/hazardous-waste-compliance-and-enforcement>

- Transporting hazardous waste pharmaceuticals, lead, and explosive ammunition falls under hazardous waste transportation.
 - Pharmaceutical Waste Management: <https://floridadep.gov/waste/permitting-compliance-assistance/content/pharmaceutical-waste-management-businesses-and>
 - Please contact Michell Smith at 850-245-8721, Michell.M.Smith@FloridaDEP.gov regarding recycling the ammunition shells and any permitting questions.
- Used Oil and Used Oil Filter Transporter & Transfer facility [40 CFR Part 279 Subpart E]:
 - Used Oil Forms: <https://floridadep.gov/waste/permitting-compliance-assistance/content/used-oil-forms>
 - This link contains the form for Used Oil and Used Oil Filters forms on Notification, Certificate of Liability Insurance, Records Keeping (Can be used for both Acceptance & Delivery), and Annual Report.
- Lead:
 - Additionally information from the EPA about lead and recycling the shells.
 - <https://www.epa.gov/lead/learn-about-lead>
 - <https://www.epa.gov/hwpermitting/energetic-hazardous-wastes#:~:text=Energetic%20hazardous%20wastes%20or%20%E2%80%9Cwaste,Munitions>
- Examples of manifests:
 - Instructions and Sample Form of Manifests
 - <https://www.epa.gov/hwgenerators/uniform-hazardous-waste-manifest-instructions-sample-form-and-continuation-sheet>
 - How to obtain manifest forms:
 - <https://www.epa.gov/hwgenerators/approved-registered-printers-epas-manifest-registry#how>
 - Electronic Manifest Tracking System
 - <https://www.epa.gov/e-manifest>
- Testing:
 - A transporter must have a waste determination or test analysis before transporting any waste. This can be received from the waste generator or conducted by the transporter.
 - Example of Used Oil Halogen testing is a Dexsil Clor-D-Tect kit.
- Links to Regulations: CFR & F.A.C.

CFR = Federal Regulations

- <https://www.ecfr.gov/>
- Used Oil & Used Oil Filters = 40 CFR 279
- Hazardous & Universal Waste = 40 CFR 260-268
- F.A.C. = Florida Regulations
 - <https://www.flrules.org/>
 - Used Oil = 62-710
 - Hazardous & Universal Waste = 62-730

Please submit the requested information by **08/27/2024**. If you have any additional questions or concerns, feel free to contact me via email or at the phone below.

Best regards,



Jade Knight

Environmental Specialist II

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Monday-Thursday, 8a.m.-6p.m.

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