



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

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**FACILITY INFORMATION:**

**Facility Name:** Independent Waste Oil Inc

**On-Site Inspection Start Date:** 06/06/2024

**On-Site Inspection End Date:** 06/06/2024

**ME ID#:** 59611

**EPA ID#:** FLR000009563

**Facility Street Address:** 343 Dennard Ave # B, Jacksonville, Florida 32254-3401

**Contact Mailing Address:** 2231 New Berlin Rd, Jacksonville, Florida 32218

**County Name:** Duval

**Contact Phone:** (904) 305-3636

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

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

**INSPECTION TYPE:**

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility Facility

Routine Inspection for Used Oil Generator Facility

Routine Inspection for VSQG (<100 kg/month) Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Ken Graden, Owner/Operator

**LATITUDE / LONGITUDE:** Lat 30° 19' 10.0643" / Long 81° 45' 58.2762"

**NAIC:** 423930 - Recyclable Material Merchant Wholesalers

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Independent Waste Oil, Inc. (IWO, the facility) was inspected on June 6, 2024, and a records review at the site was conducted on June 13, 2024. The facility was last inspected by the Department's Hazardous Waste Program on June 17, 2020. The facility is registered and operating as a Used Oil Transporter and Transfer Facility, and a Used Oil Filter Transporter and Transfer Facility. The facility is also operating as a used oil generator and Non-Handler of Hazardous Waste (NHR). IWO's Mr. Ken Graden and Mr. Terry Schlosser were present throughout the inspection.

IWO provides used oil and used oil filter transportation services primarily for small automotive repair and maintenance facilities located in several counties throughout Northeast Florida. The facility also transports antifreeze, oil-contaminated solids and non-hazardous oily wastewater. IWO transports these non-hazardous wastes collected from its customers back to this facility for bulking and transportation by other solid waste and used oil transporters. Mr. Graden owns the property. IWO has been in operation at this location since 1995.

The facility has a private well and a septic tank. IWO has three full-time employees and one part-time office manager; its hours of operation are Monday through Friday from 7:00 am – 4:00 pm. Areas inspected are described below.

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**Process Description:****TANK FARM**

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Prior to collection of a customer's used oil, the driver screens it for halogens with a portable halogen detector. If the used oil appears to contain halogens >1,000 ppm based on screening, IWO does not pick-up the used oil. Results of the halogen screening are documented on the shipping records. The Tank Farm has two 18,500-gallon aboveground storage tanks (ASTs), one 15,000-gallon AST, and one 5,000 AST that are designated for used oil; one 10,000-gallon AST, formerly for spent antifreeze, that is now empty; one 6,000-gallon AST designated for spent antifreeze; one 6,000-gallon AST designated for non-hazardous oily wastewater; and two 1,000-gallon ASTs used for product diesel fuel (Photo 1). Mr. Graden said that the tanks had been painted recently, but the 15,000-gallon used oil tank (#7) was not labeled "Used Oil" (Photo 2) [62-710.401(6), Florida Administrative Code (FAC)]. The facility operates a pumping station that has a dedicated line connected to each tank. Adjacent to the pump station was one 55-gallon drum that collects used oil absorbent from spills around the pump station. Two spill kits were located in the area near the pump station.

All of the storage tanks are located within a concrete secondary containment that will contain 110% of the volume of the largest tank. The concrete is sealed with an oil-impermeable coating, although the coating appeared to be wearing thin in a few places on the floor of the pad. The facility is reminded that routine maintenance and re-application of the coating is periodically required, and the current coating should be repaired or reapplied in the very near future to ensure an intact impermeable surface. Rainwater that collects in the secondary containment is drained to the surrounding grassed area if no sheen is present. At the time of the inspection, the containment valve was in the open position (Photo 3). Although it had rained during the previous several days, this is an Area of Concern since the valve should be kept in the closed position when stormwater is not being drained from the containment. Mr. Graden closed the valve during the inspection. If there is a sheen on the rainwater, the water is collected and disposed of with the non-hazardous oily wastewater.

**TOOL HOUSE**

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The Tool House is a small building located across the yard from the Tank Farm and within a concrete-berm. The building is used to store the facility's tools, materials, equipment, and a 15-gallon drum-top aerosol can puncturer. The puncturer had not been used and the drum was empty. The facility is reminded that when waste is first collected in the drum that the drum should be kept closed, including the puncturer itself, and the drum should be properly labeled as "Hazardous Waste" and include the hazards of the contents, i.e., ignitable, and potentially toxic depending upon the contents of the aerosol cans. No waste was accumulating in this area at the time of the inspection.

**DRUM HOUSE**

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This small building, also located within a concrete-berm, is adjacent to the Tool House. IWO recently installed a used oil filter crusher inside the building. Mr. Graden said that the crusher had been installed after U.S. Foundry and Manufacturing (FLD004128336) ceased accepting used oil filters for recycling approximately one year ago. The drum underneath the crusher was properly labeled "Used Oil," and there was a 55-gallon drum of crushed filters accumulating; the drum was properly labeled "Used Oil Filters." Crushed filters are recycled by Berman Brothers (FLD981753817), a scrap metal dealer in Jacksonville, on a monthly or bi-monthly basis depending upon workload.

Outside this building, 55-gallon drums of used oil filters awaiting crushing and crushed used oil filters are stored within a concrete-berm area which is sealed with an oil-impermeable coating. The coating appeared to be wearing thin in a few places. The facility is reminded that routine maintenance and re-application of the coating is periodically required, and the current coating should be repaired or reapplied in the very near future to ensure an intact oil-impermeable surface. There were 18 drums of used oil filters stored in the area that were closed and/or protected from the weather. All drums were properly labeled, except one drum of uncrushed used oil filters that was not labeled "Used Oil Filters" (Photo 4) [62-710.850(5)(a), FAC].

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Empty drums and drums of oily absorbents collected from customers are also stored outside this building and under the same roof within the bermed area.

## SECURITY

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The facility is surrounded by a chain link fence with one access gate. The gate is kept locked when the facility is not manned and after normal business hours. The gate and fence appeared to be in good condition.

## RECORDS REVIEW

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Records reviewed included used oil and used oil filter shipping documents and electronic logs, annual transporter and transfer facility registration, used oil and used oil filter annual reports, and insurance liability coverage.

Used oil is shipped offsite once or twice a week for recycling primarily through HOWCO Environmental Services (FLD152764767). The non-hazardous oily wastewater is transported to Water Recovery, Inc. (FLR000069062) for processing as needed. Spent antifreeze is recycled by HOWCO as needed. Oily absorbents are disposed at Chesser Island landfill in Folkston, GA monthly or as needed. IWO had TCLP metals and VOC analysis for its own used oil residues and debris generated during storage and transportation of used oil that supported management of that wastestream as non-hazardous waste.

A Used Oil Filter Processor is defined in 62-710.201(7), FAC, as "...a person who removes oil from used oil filters to prepare them for recycling." Crushing used oil filters is included in this category, but IWO had not notified the Department that it was operating as a Used Oil Filter Processor [62-710.850(3)(c), FAC].

IWO maintains shipping documents for used oil and used oil filters it accepted for transfer for a period of three years. IWO records results of the halogen screening on its shipping records. IWO maintains electronic used oil and used oil filter logs that are equivalent to FDEP form 62-710.901(2). Personnel training records had not been maintained for three years to document that personnel were trained to be familiar with laws and rules for Used Oil Transporters [62-710.600(2)(c), FAC]. Records reviewed appeared to be in order unless otherwise described herein.

## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	The facility failed to label the 15,000-gallon used oil tank (#7) as "Used Oil."
Corrective Action:	No further action is required. The tank was properly labeled at the time of the inspection.

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Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	IWO failed to maintain three years of records of personnel training that indicated the type of annual training received and the signature of the employees receiving and providing the training.
Corrective Action:	In order to return to compliance, IWO should provide current personnel training records to the inspector listed on page 1 of this report.

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Type: Violation  
Rule: 62-710.850(3)(c)  
Explanation: IWO implemented measures to "remove oil from used oil filters to prepare them for recycling" by crushing, but had not notified the Department that it was operating as a Used Oil Filter Processor.  
Corrective Action: In order to return to compliance, within 10 business days of receipt of this report, IWO should submit an 8700-12FL Notification Form to the Department to notify that it is operating as a Used Oil Filter Processor.

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Type: Violation  
Rule: 62-710.850(5)(a)  
Explanation: The facility failed to label one 55-gallon drum of uncrushed used oil filters stored at the Drum House as "Used Oil Filters."  
Corrective Action: No further action is required. The facility properly labeled the drum at the time of the inspection.

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**PHOTO ATTACHMENTS:**

Photo 1



Photo 2



Photo 3



Photo 4



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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

Cheryl L Mitchell  
**Principal Investigator Name**

Inspector  
**Principal Investigator Title**

  
**Principal Investigator Signature**

DEP  
**Organization**

08/20/2024  
**Date**

Ken Graden  
**Representative Name**

Owner/Operator  
**Representative Title**

Independent Waste Oil, 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.

**Report Approvers:**

**Approver:** Cheryl L Mitchell

**Inspection Approval Date:** 08/20/2024