



FLORIDA DEPARTMENT OF Environmental Protection

South District
PO Box 2549
Fort Myers FL 33902-2549
SouthDistrict@FloridaDEP.gov

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

August 30, 2024

Cory Baxter, Operator
Mobile Impact Services LLC
407 W Lake Drive
Sarasota, Florida 34232-1948
E-mail: mobileimpactservices@gmail.com

Re: In Compliance Letter
Mobile Impact Services LLC
407 W Lake Dr, Sarasota, FL 34232
Facility ID No. FLR000203158
Sarasota County - HW

Dear Mr. Baxter:

Department personnel conducted a routine compliance evaluation inspection of the above-referenced facility on August 22, 2024. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your compliance efforts. Should you have any questions or comments, please contact Pamela Coffin at 239-344-5659, or via email at Pamela.Coffin@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Landon Reigelman".

Landon Reigelman
Environmental Manager
Compliance Assurance Program
South District
Florida Department of Environmental Protection

Enclosure: Inspection Report



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

FACILITY INFORMATION:

Facility Name: Mobile Impact Services LLC

On-Site Inspection Start Date: 08/22/2024

On-Site Inspection End Date: 08/22/2024

ME ID#: 110098

EPA ID#: FLR000203158

Facility Street Address: 407 W Lake Dr, Sarasota, Florida 34232-1948

Contact Mailing Address: 407 W Lake Dr, Sarasota, Florida 34232-1948

County Name: Sarasota

Contact Phone: (941) 952-8945

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

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

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pamela S Coffin, Inspector

Other Participants: Cory Baxter, Operator

LATITUDE / LONGITUDE: Lat 27° 19' 57.668" / Long 82° 28' 47.6511"

NAIC: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

A routine compliance evaluation inspection (CEI) of Mobile Impact Services LLC (hereinafter, "MIS" or "facility") located at 407 W Lake Dr, Sarasota, Sarasota County was conducted on August 22, 2024 (08/22/2024) by Pamela Coffin with the Florida Department of Environmental Protection (DEP or Department). MIS 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, 40 CFR Part 273, and 40 CFR Part 279, adopted and incorporated by reference in Rules 62-710 and 62-730, Florida Administrative Code (F.A.C.).

MIS is registered as a used oil transporter (registration expiration is 06/30/2025) and a non-handler of hazardous waste. The facility operates out of a garage at a residential property owned by Cory and Shona Baxter. According to the Florida Division of Corporations, Cory and Shona Baxter are the managing members of Mobile Impact Services LLC.

The inspector was escorted around the facility by Cory Baxter, Operator. Upon arrival at the facility the inspector presented credentials and explained the purpose of the inspection.

Inspection History:

The facility was previously inspected by the Department on 02/19/2020 and was found to be in compliance at the time of inspection.

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

Process Description:

MIS conducts hydraulic cylinder repair/maintenance and on-site hose repair. The majority of hydraulic cylinders are transported intact (oil contained within the sealed cylinder) to the facility. Used hydraulic oil is drained and

Inspection Date: 08/22/2024

placed directly into a 150-gallon double-walled above ground storage tank maintained in the shed (photo 1). The tank was properly labeled "used oil." A container of absorbent material and absorbent pads are maintained inside the shed to respond to spills (photo 2).

Large hydraulic lifts are serviced in the field. Used hydraulic oil is drained, collected in closed/labeled 5-gallon plastic containers and transported back to the facility. Containers holding used oil are stored inside a metal "job box" inside the bed of the truck, capable of containing releases (photo 3). A log is maintained reflecting the facility always transports less than 55-gallons of used oil at one time; and less than 500-gallons of used oil annually over public highways and is therefore not subject to the Certification Program under Rule 62-710.600, F.A.C.

Used oil is picked up for recycling every 5-7 months. Disposal records reflect Cliff Berry Inc picked up 150 gallons of used oil on 04/02/2024, 125 gallons on 09/06/2023, and 140 gallons on 01/16/2023. At the time of inspection, the facility was scheduled for a pick-up of used oil. Immediately following the inspection, Mr. Baxter provided documentation of pick-up of 148 gallons of used oil on 08/22/2024.

A 16-gallon parts washer was observed outside. Mr. Baxter indicated the parts washer is no longer in use. Seldomly, mineral spirits may be used on-site; however, the material is used up when applying and no waste is generated from the use of the product.

A 55-gallon unlabeled drum was noted outside. Mr. Baxter stated it was sometimes used to transport used oil from the field. Verbal compliance assistance was provided at the time of inspection to properly label the drum with the words, "used oil." Mr. Baxter immediately corrected the labeling on-site.

Oily shop rags and absorbents were not observed at the time of inspection. Mr. Baxter indicated that, when possible, used oil, oily shop rags, and absorbent are disposed of in customer disposal containers in the field.

PHOTO ATTACHMENTS:

Photo 1 Used oil storage



Photo 2 Spill kit

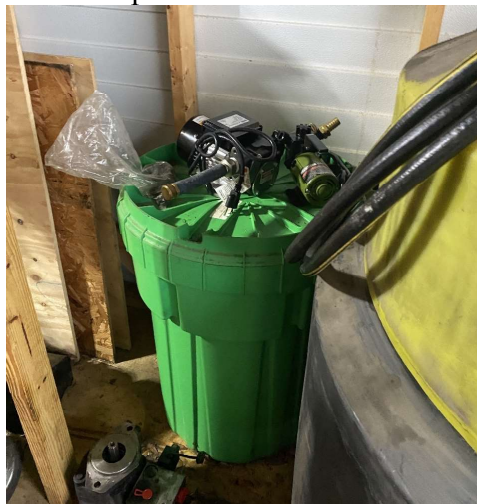


Photo 3 Used oil storage on truck



Conclusion:

The Mobile Impact Services LLC facility was inspected as a registered used oil handler and was found to be in compliance with federal and state rules and regulations.

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	✓		

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

Pamela S Coffin
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

<u>DEP</u>	<u>08/29/2024</u>
Organization	Date

Cory Baxter
Representative Name

Operator
Representative Title

Impact Mobile Services
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: Pamela S Coffin

Inspection Approval Date: 08/29/2024