# OLIVA DEPARTMENTAL PROTECTION

# Florida Department of

#### **Environmental Protection**

# **Hazardous Waste Inspection Report**

**FACILITY INFORMATION:** 

Facility Name: Ft Lauderdale Transflo Terminal

On-Site Inspection Start Date: 07/19/2024 On-Site Inspection End Date: 07/19/2024

**ME ID#**: 12133 **EPA ID#**: FLD984253542

**Facility Street Address:** 890 SW 21st Ave, Ft Lauderdale, Florida 33312-2226 **Contact Mailing Address:** 500 Water St #J975, Jacksonville, Florida 32202-4423

County Name: Broward Contact Phone: (904) 259-2279

NOTIFIED AS: Used Oil, VSQG

**WASTE ACTIVITIES: Generator:** VSQG

#### **INSPECTION TYPE:**

Routine Inspection for Used Oil Generator Facility Routine Inspection for Used Oil Transporter Facility Routine Inspection for Used Oil Transfer Facility Facility Routine Inspection for VSQG (<100 kg/month) Facility

#### **INSPECTION PARTICIPANTS:**

Principal Inspector: Shelby Luong, Inspector

Other Participants: Kaitlyn Taylor, Environmental Consultant, Chris Luthy, Terminal Manager

**LATITUDE / LONGITUDE:** Lat 26° 6' 32.9426" / Long 80° 10' 11.7511"

NAIC: 488210 - Support Activities for Rail Transportation

**TYPE OF OWNERSHIP: Private** 

#### Introduction:

On July 19, 2024 (07/19/2024), Shelby Luong, Environmental Specialist II with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection (CEI) at Ft Lauderdale Transflo Terminal (hereinafter referred to as "Transflo" or "facility"), located at 890 SW 21st Ave, Ft Lauderdale, FL 33312. The inspector was accompanied by Kaitlyn Taylor from the FDEP. Transflo 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 and 279, adopted and incorporated by reference in Rule 62-730 and 62-710, Florida Administrative Code (F.A.C.).

The inspectors were escorted around the facility by Chris Cluthy, Terminal Manager. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

Transflo occupies 8.4 acres and is connected to public water and sewer. Transflo has been operating at its current location since January 1991 and employs 11 staff. The facility operates Monday through Saturday from 6am to 6pm.

## **Notification History:**

Transflo initially notified with the Department as a Non-Handler of hazardous waste and a Used Oil Transporter (UOT) on 04/08/1993. The facility was assigned the EPA Identification (EPAID) Number FLD984253542. The facility most recently notified with the Department as a Very Small Quantity Generator (VSQG) of hazardous waste on 03/23/2023 and a UOT and a Transfer Facility of Used Oil on 03/13/2024.

Inspection History:

The facility was most recently inspected as a VSQG of hazardous waste, UOT, Used Oil Generator, and a Used Oil Transfer facility on 03/14/2018 and was found to be out of compliance. The facility returned to compliance on 10/26/2018.

Personal Protective Equipment (PPE) was required to enter the facility. The inspectors were equipped with steel-toed boots, safety vests, hard hats, and safety glasses.

Inspectors were informed that the facility used to transport used oil, but no longer do so and only transport grease and other consumer products.

## **Process Description:**

Transflo is a facility that delivers grease and other consumer products via the customers' railcars and customers' trucks. Once the railcar or truck arrives, the products are loaded onto a truck or railcar to be delivered to its intended destination. Wastes generated in the facility include used oil, sodium hydroxide and ethanol which has become a waste when a hose from the railcar is disconnected and spills. Office Space:

The office space is where the facility conducts administrative tasks. No hazardous waste or used oil was observed in this area.

## Central Accumulation Area (CAA):

The CAA is located in a storage area adjacent to the parking lot. Inspectors observed the following:

- Three 55-gallon containers with a "Used Oil" label.
- One 55-gallon container with a "Used Oil Rags" label.
- · One parts washer serviced by Safety-Kleen Systems.
- Two 33-gallon garbage bags containing oily rags.
- Four empty 55-gallon containers.
- · One 55-gallon container of product.
- · Seven 2.5-gallon containers of product.

Used oil is generated in the facility when maintenance on the customer's railcars is performed. The facility was unsure of whether the concrete in this area was sealed and oil-impermeable [Rule 62-710.401(6) F.A.C.]. Compliance Assistance was provided to have the concrete sealed and oil impermeable or provide proof that the concrete is oil impermeable. After the inspection, the facility informed inspectors that no documentation can be found to show that the concrete is sealed and oil impermeable and that the facility is now working towards having the concrete sealed to become oil impermeable.

## Railcar Area:

In this area of the facility, railcars are unloaded and loaded to prepare for delivery. Hazardous waste is generated when the railcars unload sodium hydroxide or ethanol, and it spills. From there, it is determined to be a waste through Safety Data Sheets (SDS) and taken to the CAA for proper disposal. Inspectors were informed that the facility rarely generates hazardous waste, and that hazardous waste has not been generated at the facility within the past three years.

At the time of inspection, near the fencing adjacent to the railway tracks, inspectors observed a container of phosgene gas strips. Inspectors were informed that on railcars containing flour, phosgene gas strips are transported with the flour to act as a pesticide. Inspectors requested a waste determination on the gas strips. The facility informed inspectors that the phosgene gas strips are not a waste while on-site and provided a waste determination showing that it is not a hazardous waste.

Inspectors requested to see DOT numbers displayed on vehicles. The facility informed inspectors that since the facility does not utilize vehicles to transport over highways, DOT numbers are not required to be displayed. The facility also provided documentation of correspondence in previous years between the Department and the facility, explaining how they do not require DOT numbers to be displayed.

During the inspection, inspectors were unable to observe the Used Oil registration form and identification number displayed prominently within the facility [Rule 62-710.500(4) F.A.C.]. Compliance assistance was provided to have the Used Oil registration form and identification number displayed prominently within the facility.

#### Records Review:

- Inspectors requested to see three years-worth of hazardous waste manifests. The facility informed inspectors
  that the facility has not generated hazardous waste within the past three years. Based on record review, the
  facility operates as a VSQG of hazardous waste and is compliant with the maximum amount of hazardous
  waste generated and stored onsite.
- Used Oil Disposal records: The facility has had only one used oil disposal shipment in the past three years, which occurred on July 12, 2024. The used oil was sent to transporter Clean Harbors Environmental Services, Inc (EPAID: MAD039322250) and final designated facility Clean Harbors Chattanooga LLC (EPAID: TND982141392) (40 CFR 279.24).
- Acceptance and Delivery records: The facility informed inspectors that the facility does not transport used oil, and only facilitate transfer of customer's products between railcars and trucks, and therefore do not have acceptance and delivery records of used oil (Rule 62-710.510 F.A.C.).
- Liability Insurance: The facility informed inspectors that since the railcars and trucks belong to the customers and not the facility, liability insurance is not required (Rule 62-710.600(2)(e) F.A.C.).
- Training: The facility does conduct trainings for facility personnel who handle used oil (Rule 62-710.600(2)(c) F.A.C.).
- The facility submitted an Annual Report for Used Oil and Used Oil Filter activities for the year 2023 (Rule 62-710.510(5) F.A.C.).

#### **New Potential Violations and Areas of Concern:**

#### **Violations**

Type: Violation

Rule: 62-710.401(6)

Question Number: 5.7

Question: Stored on an oil-impermeable surface? 62-710.401(6)

Explanation: The facility was unsure of whether or not the concrete on which the used oil containers

sit upon is oil impermeable.

Corrective Action: The facility must store used oil containers on an oil-impermeable surface and provide

proof that the surface is oil-impermeable.

#### Comments:

On 09/05/2024, the facility informed inspectors that documentation cannot be produced to show that the concrete is sealed and will be sealing the concrete. The facility provided the SDS of the sealant. The Department is awaiting documentation when the concrete will be sealed and oil-impermeable.

Type: Violation

Rule: 62-710.500(4)

Explanation: Inspectors were unable to observe the Used Oil registration form and identification

number displayed prominently within the facility

Corrective Action: The facility must display the Used Oil registration form and identification number

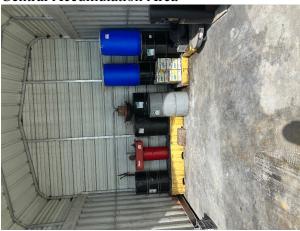
prominently within the facility.

#### Comments:

On 08/12/2024, the facility submitted photo documentation of the registration displayed. Corrective action for this violation was completed on 08/12/2024.

# **PHOTO ATTACHMENTS:**

Central Accumulation Area



#### Conclusion:

Transflo was inspected as a VSQG of hazardous waste, a Used Oil Transporter, a Used Oil Generator, and a Used Oil Transfer Facility and was found to be out of compliance for the following:

- Failure to store used oil containers on an oil impermeable surface per Rule 62-710.401(6) F.A.C.
- Failure to display the Used Oil registration form and identification number prominently within the facility per Rule 62-710.500(4) F.A.C.

The Department is still awaiting the following documentation:

• Documentation that shows that the used oil containers are stored on an oil impermeable surface per Rule 62-710.401(6) F.A.C.

The facility will be sent a Compliance Assistance Offer Letter.

## 2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	1		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	<b>√</b>		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	1		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	<b>√</b>		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 Is it excluded under 261.4? Is it listed in subpart D of 261 or appendix IX of 261? Has the waste been analyzed? Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	<b>√</b>		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5)  Name and address of the generator and TSD/authorized facility.  Type and amount of hazardous waste delivered.  Date of shipment			<b>√</b>
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)			<b>✓</b>

## 5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	1		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	1		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	1		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			1
Item No.	Secondary Containment		No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)		1	
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)			1
5.10	Does the building provide adequate secondary containment, or are the containers /tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	<b>✓</b>		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	1		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	1		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			1
5.16	contain the released oil? 279.22(d)(2)			1
5.17	clean up and manage properly the released used oil and other materials? 279.22 (d)(3)			1
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			1
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			<b>√</b>

pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)  Item No. Used Oil Filter Container Management  Yes No N/A  5.21 Does the facility store used oil filters in containers? 62-710.850(5)(a)  Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)  (a)  5.23 Are the used oil filter containers in good condition? 62-710.850(5)(a)  5.24 Are the used oil filter containers not leaking? 62-710.850(5)(a)  5.25 Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)  5.26 Are the used oil filter containers stored on an oil-impervious surface? 62-710.850  (5)(a)  Item No. Releases from Used Oil Filter Containers  Yes No N/A  5.27 Has the generator, upon detection of a release, done all of the following, as applicable:  5.28 stop the release? 62-710.850(5)(b)  5.29 contain the released oi62-710.850(5)(b)  5.30 clean up and manage properly the released oil and any subsequent oily waste?  62-710.850(5)62-710.850(5)(b)  5.31 repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4					
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(a)  Are the used oil filter containers in good condition? 62-710.850(5)(a)  Are the used oil filter containers not leaking? 62-710.850(5)(a)  5.25  Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)  5.26  Are the used oil filter containers stored on an oil-impervious surface? 62-710.850 (5)(a)  Item No.  Releases from Used Oil Filter Containers  Yes No N/A  5.27  Has the generator, upon detection of a release, done all of the following, as applicable:  5.28 stop the release? 62-710.850(5)(b)  5.29 contain the released oi62-710.850(5)(b)  5.30 clean up and manage property the released oil and any subsequent oily waste? 62-710.850(5)(2-710.850(5)(6)-2-710.850(5)(b)  5.31 repair or replace any leaking used oil filter storage containers prior to returming them to service? 662-710.850(5)(b)4  Item No.  Used Oil Mixtures  Yes No N/A  5.32 Is the mixture being managed as listed hazardous waste? 279.10(b)(1)  5.33 Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability? If so:  5.34 Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10 (b)(2)(ii)  5.35 Does the hazardous waste exhibit ANY characteristic other than ignitability)? If so:  5.36 Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)?  279.10(b)(2)(i)  5.37 Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:  5.38 Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)  5.39 Does the facility generate mixtures of other materials end and any absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(c)(3)  4 Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated ostics and clay absorbents are solid waste, s	5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)			1
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(i.e. absorbents, rags, dirt)? If so:  5.38 Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)  5.39 Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)  5.40 Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)	5.36	characteristic of the mixture is from the used oil, rather than from the HW)?			1
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absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)		a heating value of at least 5000 Btu/pound to be burned for energy recovery			
		under 279, so low-Btu-value materials like contaminated soils and clay			
5.41 Does the facility generate mixtures of used oil with fuel or fuel products? If so:		absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			

5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			1
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			1
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			1
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			1
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23 (b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			1
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24			✓
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			<b>/</b>
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			1
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)			1
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			<b>√</b>
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			<b>√</b>
5.57	Does the generator transport the used oil to an aggregation point that is owned /operated by the same generator? 279.24(b)(3)			<b>√</b>
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the			
	processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			

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5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			<b>√</b>
Item No.	Marketing and Processing	Yes	No	N/A

# 6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)			1
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			1
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			<b>✓</b>
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1)  Exemption Type - Tolling Agreement  Exemption Type - VSQG Bill-of-Lading			<b>✓</b>
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)			1
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)			1
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)			1
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)			1
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)			1
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)			1
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			<b>√</b>
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			<b>✓</b>
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)			<b>✓</b>
Item No.	Rail Transporters	Yes	No	N/A

	,			
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging			1
	receipt of the hazardous waste? 263.20(f)(1)(i)			
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			<b>/</b>
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			1
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			1
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20 (f)(2)			1
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f) (3)(i)			1
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			1
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			1
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e) (3)			1
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			1
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			1
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2)  Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted  All DOT-required shipping information  The date the waste is accepted			<b>√</b>
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			1
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			1
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			1
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			<b>√</b>
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			<b>√</b>

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	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)		<b>√</b>
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)		<b>✓</b>

# 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

Shelby Luong		Inspector		
Principal Investigator Name		Principal Investigator 1	itle	
		DEP	09/17/2024	
Principal Inv	estigator Signature	Organization	Date	
Kaitlyn Taylor		Environmental	Consultant	
Inspector Na	me	Inspector Title	<u>e</u>	
		DEP		
		Organization		
Chris Luthy		Terminal Mana	ager	
Representati	ive Name	Representativ	e Title	
		Ft Lauderdale	Transflo Terminal	
		Organization		
	nitting to the accuracy of a	te Representative only acknowl ny of the items identified by the	•	
Report Appro	overs:			
Approver:	Viviana Useche	Inspection	Approval Date:	09/20/2024