



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

FACILITY INFORMATION:

Facility Name: Jam Environmental & Vacuum Services LLC

On-Site Inspection Start Date: 08/30/2024

On-Site Inspection End Date: 08/30/2024

ME ID#: 100960

EPA ID#: FLR000176842

Facility Street Address: 250 SW 21st Ter, Fort Lauderdale, Florida 33312-1425

Contact Mailing Address: 250 SW 21st Terrace, Fort Lauderdale, Florida 33312-1425

County Name: Broward

Contact Phone: (954) 366-8743

NOTIFIED AS:

Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Used Oil:** On-Spec, Off-Spec, Transporter, Oil Filters **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Generator Facility

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

Routine Inspection for Used Oil Marketer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shelby Luong, Inspector

Other Participants: Kaitlyn Taylor, Environmental Consultant, Bailey Daniels, Environmental Manager, Sean Hagerott, Vice President of Operations, Henny Zuloaga, Office Manager

LATITUDE / LONGITUDE: Lat 26° 6' 55.1919" / Long 80° 10' 12.8594"

NAIC: 562998 - All Other Miscellaneous Waste Management Services

TYPE OF OWNERSHIP: Private

Introduction:

On August 30, 2024 (08/30/2024), Shelby Luong, Environmental Specialist II with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection (CEI) at Jam Environmental & Vacuum Services LLC (hereinafter referred to as "Jam" or "facility"), located at 250 SW 21st Ter, Fort Lauderdale, FL 33312. The inspector was accompanied by Kaitlyn Taylor and Bailey Daniels from the FDEP. Jam was inspected to determine the facility's compliance with the state and Federal used oil regulations described in Title 40, Code of Federal Regulations (CFR) Parts 279, adopted and incorporated by reference in Rule 62-710, Florida Administrative Code (F.A.C.).

The inspectors were escorted around the facility by Sean Hagerott, Vice President of Operations, and Henny Zuloaga, Office Manager. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

Jam occupies 10,000 square feet and is connected to a septic tank system. Jam has been operating at its current location since 2011 and employs 12 staff. The facility operates an office space from Monday through Friday from 7am to 3pm and truck operations run 24/7.

Notification History:

Jam initially notified with the Department as Very Small Quantity Generator (VSQG), Petroleum Contact Water Manager, Used Oil Transporter (UOT), Used Oil Marketer, and Used Oil Filter Transporter on 07/14/2011. The facility was assigned the EPA Identification (EPAID) Number FLR000176842. The facility most recently notified with the Department as a VSQG, Petroleum Contact Water Manager, UOT, Used Oil Marketer, and Used Oil

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Filter Transporter on 07/15/2024.

Inspection History:

The facility was most recently inspected as a UOT, a Very Small Quantity Generator (VSQG) of hazardous waste, and Used Oil Marketer on 08/16/2016 and was found to be out of compliance. The facility returned to compliance on 08/17/2016.

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

Process Description:

Jam is a facility that transports used oil and used oil filters from other facilities. The facility consists of an office space, a storage bay area, and a truck lot space, where the facility parks its trucks and pumping vehicle. The facility utilizes the pumping truck to pick up used oil from other facilities. Jam does not generate, manage or transport any hazardous waste.

Office Space:

The office space is where the facility conducts administrative tasks. No hazardous waste or used oil was observed in this area. Inspectors were able to observe the Used Oil registration form and identification number displayed prominently within the facility (Rule 62-710.500(4) F.A.C.).

Storage Bay Area:

The storage bay area is where equipment and wastes are stored. Used oil is generated from maintenance on the fleet vehicles, which is then disposed of with the used oil picked up from other facilities. At the time of inspection, inspectors observed the following:

- One 110-gallon used oil tank without labeling [40 CFR 279.45(g)(1) and Rule 62-710.401(6) F.A.C.].
- One 55-gallon used oil filter container without labeling [Rule 62-710.850(5)(a)].
- Three 5-gallon buckets used to hold used oil without labeling [40 CFR 279.45(g)(1) and Rule 62-710.401(6) F.A.C.]
- Six spent lead-acid batteries.

Compliance assistance was provided to properly label the used oil container, the used oil filter container, and the three buckets. Spent lead-acid batteries are sent for recycling and recycling receipts were provided.

Parking Lot:

In this area of the facility, the facility parks the pumping truck, which is used to pump used oil from other facilities and pumps out the used oil into a tanker truck with two 2400-gallon tanks. The representative informed inspectors that the used oil is stored on-site in the tanker truck for approximately two weeks, then the truck is used to transport the used oil to Triumvirate for disposal [Rule 62-710.201(11) F.A.C.]. Compliance assistance was provided to have the facility notify as a Used Oil Transfer Facility. Inspectors did not observe a "Used Oil" label on tanker truck [40 CFR 279.45(g)(1) and Rule 62-710.401(6) F.A.C.]. Compliance assistance was provided to label the tanker truck with a "Used Oil" label, placed within secondary containment, and on an oil-impermeable surface.

Records Review:

- Acceptance and Delivery records: The used oil was sent to final destination facility Triumvirate Environmental (Florida), Inc. (FLD981018773) (40 CFR 279.43(a)). Inspectors observed acceptance and delivery records that show used oil is stored for more than 24 hours and used oil filters are stored on-site for more than 10 days [Rule 62-710.850(3) F.A.C.]. Compliance assistance was provided to have the facility notify as a Used Oil Transfer Facility and Used Oil Filter Transfer Facility.
- Liability Insurance: The Department is still awaiting submittal of the financial liability. [Rule 62-710.600(2)(e) F.A.C.]. Compliance assistance was provided to provide the financial liability.

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- Training: The Department is still awaiting submittal of the training records. [Rule 62-710.600(2)(c) F.A.C.]. Compliance assistance was provided to provide training records.
- 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: **279.45(g)(1), 62-710.401(6)**

Explanation: Inspectors observed one 110-gallon container in the storage bay area and the tanker truck in the parking space that did not have a "Used Oil" label. Inspectors also observed three buckets in the storage bay area without a "Used Oil" label.

Corrective Action: The facility must label all used oil containers with a "Used Oil" label.

Comments:

On 09/27/2024, the facility submitted photo documentation of the 110-gallon container labeled "Used Oil". The Department is still awaiting submittal of the tanker truck and the three buckets with a "Used Oil" label.

Photo Attachments:

110-gallon container and three buckets without "Used Oil" label



Used Oil Buckets



Used Oil and Three Buckets without "Used Oil" label



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Type: Violation
Rule: 62-710.401(6)
Question Number: 5.13
Question: 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)
Explanation: The tanker truck used to store used oil was observed parked on an non-oil permeable surface and not within secondary containment.
Corrective Action: The facility must store the used oil on an oil-impermeable surface and within secondary containment.

Comments:

The Department is still awaiting submittal of the used oil on the tanker truck within secondary containment and on an oil-impermeable surface.

Photo Attachments:

Tanker Truck on Non-Oil impermeable Surface



Tanker Truck on Non-Oil impermeable Surface



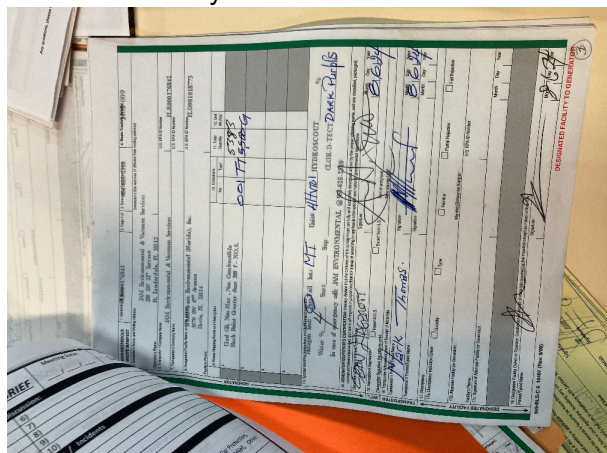
Type: Violation
Rule: 62-710.500(1)
Explanation: The inspectors observed Used Oil acceptance and delivery records that show the facility is storing used oil on-site for longer than 24 hours.
Corrective Action: The facility must notify as a Used Oil Transfer Facility by filling the 8700-12F form and submit it to the Department.

Comments:

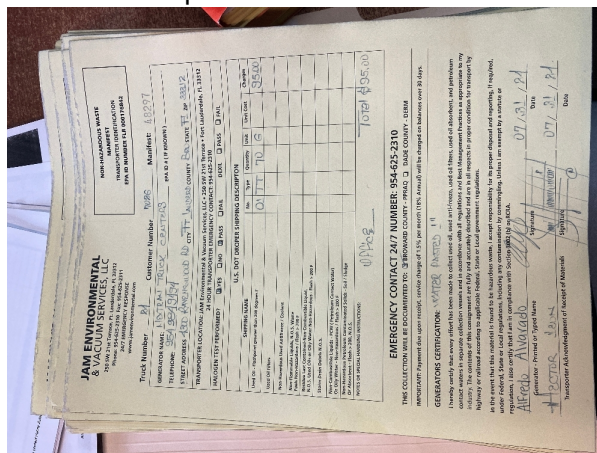
The Department is still awaiting submittal of the 8700-12F notification form.

Photo Attachments:

Used Oil Delivery Record 08/06/2024



Used Oil Acceptance Record 07/31/2024



Type:	Violation
Rule:	62-710.600(2)(c)
Explanation:	The facility has not yet provided training records of facility personnel who handle and manage used oil.
Corrective Action:	The facility must provide training records of facility personnel who handle and manage used oil.

Comments:

The Department is still awaiting submittal of training records.

Type:	Violation
Rule:	62-710.600(2)(e)1.a
Explanation:	The facility has not yet provided the financial liability for the vehicles.
Corrective Action:	The facility must provide financial liability on the facility vehicles that transport used oil.

Comments:

The Department is still awaiting submittal of financial liability.

Type:	Violation
Rule:	62-710.850(3)
Explanation:	The inspectors observed Used Oil filter acceptance and delivery records that show the facility is storing used oil filters on-site for longer than 10 days.
Corrective Action:	The facility must notify as a Used Oil Filter Transfer Facility by filing a 8700-12FL Form and submit it to the Department.

Comments:

The Department is still awaiting submittal of 8700-12F form for the facility to notify as a Used Oil Filter Transfer Facility.

Photo Attachments:

Used Oil Filter Acceptance Record 08/01/2024

Used Oil Filter Acceptance Record form from Jam Environmental & Vacuum Services LLC, dated 08/01/2024. The form includes fields for customer information, manifest details, and a table for recording filter acceptance. The total weight is listed as 280.00.

Used Oil Filters Delivery Record 08/14/2024

Used Oil Filters Delivery Record form from Jam Environmental & Vacuum Services LLC, dated 08/14/2024. The form includes fields for customer information, manifest details, and a table for recording filter delivery. The total weight is listed as 280.00.

Type: Violation
Rule: 62-710.850(5)(a)
Question Number: 5.22
Question: Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)
Explanation: The facility observed one 55-gallon container of used oil filters without a "Used Oil Filters" label.
Corrective Action: The facility must labeled used oil filter containers with a "Used Oil Filters" label.

Comments:

On 09/27/2024, the facility submitted a photo of the 55-gallon container labeled "Use Filters". The Department is still awaiting photo documentation of the 55-gallon container labeled "Used Oil Filters".

Photo Attachments:

Used Oil Filters in a container



Used Oil Filters container without proper labeling

**Conclusion:**

Jam was inspected as a Used Oil Transporter and a Used Oil Filter Transporter and was found to be out of compliance for the following:

- Failure to label the used oil on the tanker truck and a 110-gallon used oil container with a "Used Oil" label per 40 CFR 279.45(g)(1) and Rule 62-710.401(6) F.A.C.
- Failure to notify as a Used Oil Transfer Facility per Rule 62-710.500(1) F.A.C.
- Failure to store used oil on an oil impermeable surface and within secondary containment per Rule 62-

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710.401(6) F.A.C.

- Failure to provide training records of facility personnel who handle and manage used oil per Rule 62-710.600(2)(c) F.A.C.
- Failure to provide financial liability for the facility vehicles that transport used oil per Rule 62-710.600(2)(e)1. a F.A.C.
- Failure to notify as a Used Oil Filter Transfer Facility per Rule 62-710.850(3)(b) F.A.C.
- Failure to label one 55-gallon container of used oil filters in the storage bay area with a "Used Oil Filters" label per Rule 62-710.850(5)(a) F.A.C.

On 09/06/2024, inspectors sent the exit interview email to request documentation for the facility to return to compliance and given a deadline of 09/20/2024 to provide documentation of corrective actions. The Department has granted multiple extensions to provide submittals.

The Department is still awaiting the following documentation:

- Photo documentation of used oil on the tanker truck and three used oil buckets with a "Used Oil" label.
- The 8700-12F form for the facility's notification as a Used Oil Transfer Facility and Used Oil Filter Transfer Facility.
- Photo documentation of the used oil on the tanker truck on an oil-impermeable surface and within secondary containment.
- Training records of facility personnel who handle and manage used oil.
- Financial liability for facility vehicles that transport used oil.
- Photo documentation of the 55-gallon container of used oil filters with a "Used Oil Filters" label.

The facility will be sent a Compliance Assistance Offer Letter.

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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)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
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)			✓
Item No.	Secondary Containment	Yes	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)	✓		
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)	✓		
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)	✓		
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)	✓		
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)		✓	
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)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
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)			✓
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)			✓

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5.20	Is the facility in compliance with the prohibition against using used oil for road or 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)	✓		
5.22	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 oil? 62-710.850(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? 62-710.850(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)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a 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 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)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			

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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)			✓
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)			✓
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)			✓
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)			✓
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)			✓
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)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
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)			✓
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)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
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)			✓
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:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓

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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)			✓
Item No.	Marketing and Processing	Yes	No	N/A

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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

Shelby Luong**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**10/18/2024**Date**Kaitlyn Taylor**Inspector Name**Environmental Consultant**Inspector Title**DEP**Organization**Bailey Daniels**Inspector Name**Environmental Manager**Inspector Title**DEP**Organization**Sean Hagerott**Representative Name**Vice President of Operations**Representative Title**Jam Environmental & Vacuum
Services LLC**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.

Henny Zuloaga**Representative Name**Office Manager**Representative Title**Jam Environmental & Vacuum
Services LLC**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:

Inspection Date: 08/30/2024

Approver: Bailey Daniels

Inspection Approval Date: 10/24/2024