



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

October 29, 2024

T.J. Mc Caustland, Permit Compliance Manager
Clean Earth Specialty Waste Solutions, Inc.
5158 Ashley Drive
Covington, Georgia 30014
tmccaustland@cleaneearthinc.com

Re: Clean Earth Specialty Waste Solutions, Inc.
HW Facility ID #FLR000006353
Orange County

Dear Mr. Mc Caustland:

Department personnel conducted an inspection of the above-referenced facility on September 24, 2024. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Michael Eckoff at 407-897-4308 or via e-mail at michael.eckoff@floridadep.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jill Farris".

Jill Farris, Environmental Administrator
Central District
Florida Department of Environmental Protection



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

FACILITY INFORMATION:

Facility Name: Clean Earth Specialty Waste Solutions Inc

On-Site Inspection Start Date: 09/24/2024

On-Site Inspection End Date: 09/24/2024

ME ID#: 56404

EPA ID#: FLR000006353

Facility Street Address: 314 W Landstreet Rd #B, Orlando, Florida 32824-7803

Contact Mailing Address: 314 W Landstreet Rd #B, Orlando, Florida 32824-7858

County Name: Orange

Contact Phone: (407) 855-0141

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Other Status:** Household Hazardous Waste + Very SQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **Other:** Person Authorized to Mangle Very Small Quantity Waste
Generated at Other Facilities **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices
Transport: Batteries, Pesticides **Transfer Facility:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Michael Eckoff, Inspector

Other Participants: Carly Cogburn, Environmental Specialist, Aaron Cayson, Facility Manager

LATITUDE / LONGITUDE: Lat 28° 26' 8.1123" / Long 81° 22' 50.7241"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On September 24, 2024, Michael Eckoff and Carly Cogburn, Florida Department of Environmental Protection (FDEP or Department), accompanied by Aaron Cayson, Clean Earth Specialty Waste Solutions, Inc. (Clean Earth or Facility), inspected Clean Earth for compliance with state and federal hazardous waste transporter regulations. The Facility most recently notified the Department of its waste activities on February 20, 2024 and initially received EPA identification number FLR000006353 on August 6, 2020. The Facility is currently registered as a hazardous waste transporter (expires June 30, 2025), used oil transporter and transfer facility (expires June 30, 2025), and used oil filter transporter and transfer facility (expires June 30, 2025). Current liability insurance expires on June 30, 2025.

The property is owned by Torking LP, 417 Walmer Rd., Toronto ON M59-2X9.

Inspection History (past five years)

The Facility was inspected in August 2021 by the Department for compliance with state and federal hazardous waste transporter regulations and no potential violations were noted at that time.

Process Description:

The Facility is comprised of a 100,000-square foot building with offices in front and a storage warehouse behind the offices. The warehouse is segregated into distinct staging areas. There is a fenced in area that was formerly used for non-hazardous and hazardous waste pharmaceuticals and floor space that has been designated for specific waste types. At the time of the inspection the warehouse had rows for 10-day waste, universal waste

Inspection Date: 09/24/2024

(UW), used oil, and non-hazardous waste as well as a staging area and an unloading area.

Prior to picking up hazardous waste, generators submit a waste profile to Clean Earth. The Facility then submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, Clean Earth provides the generator with a description of the waste and an acceptance letter. Clean Earth then schedules a date and time for transport. The waste is transported to Clean Earth's facility and stored on-site, in a trailer or warehouse, for no more than 10 days.

Each trailer can store a maximum of ninety 55-gallon drums. Trailers are stored on a sloped concrete slab that has a six-inch high concrete curb around three sides of the pad.

David Castillo, Warehouse Supervisor joined the inspection team.

The unloading area is just outside the fencing of the pharmaceutical storage area. Waste shipments are checked into the Facility's 10-day transfer facility in this area.

Outside a bay door were three trailers containing supplies.

10-day waste was staged in rows inside the warehouse. A log is kept to track how long waste is stored at the Facility.

Used oil, universal waste, and non-hazardous PCB ballasts were staged in rows inside the warehouse. Used oil containers were stored on spill pallets.

Two trailers parked on the concrete curb contained 10-day waste.

On the south end of the Facility were a number of trailers containing supplies and non-hazardous waste ready for shipment off-site, and empty trailers.

Records

A review of receiving manifests for the last three years in random intervals found no issues.

Conclusion:

Clean Earth Specialty Waste Solutions, Inc. was inspected as a hazardous waste transporter and no potential violations were noted at that time.

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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

Michael Eckoff
Principal Investigator Name

Inspector
Principal Investigator Title

Michael Eckoff
Principal Investigator Signature

DEP
Organization

10/24/2024
Date

Carly Cogburn
Inspector Name

Environmental Specialist
Inspector Title

FDEP - Central District
Organization

Aaron Cayson
Representative Name

Facility Manager
Representative Title

Clean Earth Specialty Waste
Solutions, 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: Jill M. Farris

Inspection Approval Date: 10/25/2024