



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

FACILITY INFORMATION:

Facility Name: World Petroleum Corp

On-Site Inspection Start Date: 10/30/2024

On-Site Inspection End Date: 10/30/2024

ME ID#: 50795

EPA ID#: FLD980709075

Facility Street Address: 3650 SW 47th Ave, Davie, Florida 33314

Contact Mailing Address: 3701 SW 47th Ave Ste 101, Davie, Florida 33314

County Name: Broward

Contact Phone: (954) 327-0724

NOTIFIED AS:

Non-Handler, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste **TSD:** Operating Non-Commercial TSD **Used Oil:** On-Spec, Oil Filters, Processor **Other:** Transport **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kaitlyn Taylor, Inspector

Other Participants: Jade Knight, Environmental Specialist III, Chad Gregory, Director of Operations, Andrea Miranda, Secretary

LATITUDE / LONGITUDE: Lat 26° 4' 34.1948" / Long 80° 12' 33.0274"

NAIC: 324191 - Petroleum Lubricating Oil and Grease Manufacturing

TYPE OF OWNERSHIP: Private

Introduction:

On October 30, 2024 (10/30/2024), Kaitlyn Taylor with the Florida Department of Environmental Protection (FDEP) conducted a compliance evaluation inspection at World Petroleum Corp (hereinafter WPC or facility) located at 3650 SW 47th Ave, Davie, FL 3331. WPC 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 62-710 and 62-730 Florida Administrative Code (F.A.C.). The inspector was accompanied by Jade Knight with the FDEP.

The inspectors were escorted around the facility by Craig Gregory, Director of Operations. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

World Petroleum Corp occupies 1 acre at this location and is connected to municipal water and sewer. WPC opened in 2004 and has been operating at its current location since 2007. WPC employs 15 staff. The facility operates 7 AM – 5 PM Sunday through Friday, with some additional overtime as needed.

Notification History:

WPC currently operates as a Used Oil and Material Processing Facility under permit numbers 54228-010-HO and 54228-011-SO. The permit was issued on 10/20/2023 and expires on 10/12/2028.

The facility initially notified with the Department as a conditionally exempt small quantity generator of hazardous waste and a transporter, processor, and marketer of used oil on 12/27/2007 and was assigned the EPA

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Identification (EPAID) Number FLD980709075. The facility most recently notified in 2024 as a used oil processor, transporter, transfer facility, and marketer; a used oil filter processor, transporter, and transfer facility; a hazardous waste and petroleum contact water (PCW) transporter; and a small quantity handler of universal waste.

Inspection History:

- 12/03/2020: The facility was inspected by the Department as a permitted used oil processor, transporter, transfer facility, and marketer and a hazardous waste and universal waste transporter and was found to be in compliance.
- 08/25/2022: The facility was inspected by the Department as a permitted used oil processor, transporter, transfer facility, and marketer and a hazardous waste and universal waste transporter and was found to be out of compliance for failure to comply with permit requirements. A consent order was sent on 01/27/2023 and a case closure letter was sent on 03/13/2023.

Personal Protective Equipment (PPE) was required to enter the facility. The Department inspectors were equipped with steel-toed boots, and a safety vest.

Process Description:

World Petroleum Corp is authorized to process used oil, used oil filters, oily water, and solid waste, and to collect and transport PCW. WPC transports hazardous waste from generator facilities directly to the second transporter, Cliff Berry (FLR000083071), and no waste is stored on-site. WPC does not generate hazardous waste. The facility is surrounded by security fencing and concrete-block walls. The entire facility is equipped with sumps that lead to an oily water separator.

WPC maintains a fleet of trucks that include vacuum trucks, tractor-trailers, pump trucks, box trucks, and pickup trucks. The fleet vehicles are used to transport used oil, PCW, oily water, used oil filters, and oily waste; to pump out, vacuum, and transport used oil or oily water; and to transport hazardous waste and solid waste with the box trucks.

The facility consists of the following areas:

- Processing Area
- Pumping Station
- Tank Farm
- Parking and Storage
- Employee Shed
- Office

Processing Area:

This area is where all oily solid waste is processed. This area consists of an empty drum storage area, an oily solids for processing storage area, a used oil filter crushing area, and two 20-yard roll-off containers. The entire area is completely covered by an awning.

Drums of oily waste and used oil filters are staged to the left of the filter crushing area. Trucks unload the drums to this area, and they are processed daily. Inspectors observed approximately 13 55-gallon drums labeled "Non-hazardous waste". The oily solids are consolidated into one of the roll-off containers. Inspectors observed the roll-off labeled "Non-hazardous waste – solids for landfill". Compliance assistance was provided onsite and in the exit interview to label the roll-off container with the words "Processed Solid Waste" per the facilities' permit 54228-010-HO & 54228-011-SO Part II Subpart E – Non-Hazardous, Non-Used Oil Waste Conditions #8 (62-710.800(2) FAC).

The used oil filter drums are dumped out onto a platform where they are drained and filtered through to remove any non-metal filters. The non-metal filters are added to the roll-off for processed solid waste once they are fully drained. The used oil from the filters is drained into a catch basin that is pumped into a 250-gallon container

labeled "used oil". After the filters are drained and all non-metal ones are removed, they go into the crusher. The crusher creates cubes that come out onto a conveyor belt depositing them into a 20-yard roll-off for recycling.

Inspectors were informed that this area is pressure washed at the end of every day and the water is collected in the facilities oily water separator.

Next to this area inspectors observed the incinerator, which is used to heat oil for processing, and storage of non-hazardous demulsifier for used oil processing. No discrepancies were observed.

Pumping Station:

The pumping station is where trucks come to offload used oil and oily water. The facility has two separate pumping systems, one for used oil and one for oily water. The waste is pumped from the trucks into the corresponding tanks in the tank farm.

For the oily water area, inspectors observed one 5-gallon bucket to catch drips from the pump hose and one 80-gallon container to collect any oily sludge. The oily water is added into the oily water tank and the oily sludge is added to the processed solid waste roll-off.

For the used oil area, inspectors observed one 5-gallon bucket to catch drips from the pump hose and drips when collecting samples for testing; and one 55-gallon drum to catch drips from collecting samples from the cooker/processing tank. These containers were not labeled. Compliance assistance was provided onsite and in the exit interview to label all containers of used oil with the words "Used Oil" (40 CFR 279.22(c)(1) & 62-710.401 (6) FAC).

Behind the pumping station inspectors observed one 30k-gallon cooker/processing tank for used oil processing. No discrepancies were observed.

Tank Farm:

The tank farm consists of twelve registered and regulated above ground tanks. Inspectors observed 10 tanks for used oil and oily water, one tank for PWC, and one tank for processed oil. All the tanks were labeled correctly. All the tanks and the secondary containment are inspected daily and if any rainwater is accumulated in the secondary containment, it is pumped out daily into the oily water separator. Inspectors observed the tank farm secondary containment with cracks and deteriorated epoxy sealant. Compliance assistance was provided on site and in the exit interview for the facility to repair the cracks and reseal the secondary containment to make it sufficiently impervious to used oil per the facilities' permits 54228-010-HO & 54228-011-SO Part II Subpart B – Used oil conditions #8 (62-710.800(2) FAC and 40 CFR 279.54(d)(2)).

Inspectors observed one pumping station in front of the tank farm for pumping oily water only, no used oil.

Parking and Storage:

This area is where the facility stores raw materials and some of their trucks. Inspectors observed three shipping containers of raw materials, including spill materials and emergency equipment. No waste was observed in this area.

Employee Shed:

The employee shed is located at the front of the facility. This area is where employees store their personal items while working. Inspectors observed SDS sheets, the evacuation route, a first aid kit, a copy of the facilities contingency and spill plans. No waste was observed in this area.

Office:

The facilities office is located down the street from the operations. This area is used for administrative purposes and record keeping. Inspectors reviewed records and no waste was observed in this area.

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Records Review:

Preparedness and Prevention:

Spill kits and fire extinguishers are available on-site [40 CFR 279.52(a)(2)]. The facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment [40 CFR 279.52(a)(3)]. The facility uses cell phones and a landline for internal and external communication [40 CFR 279.52(a)(2)]. Adequate aisle space was observed throughout the facility [40 CFR 279.52(a)(5)]. The facility could demonstrate that the appropriate arrangement with the local police, fire department, hospital, and local emergency response agencies have been made [40 CFR 279.52(a)(6)].

SPCC Plan:

The facilities SPCC plan accurately demonstrates the physical layout of the facility with the location of all used oil storage, a procedure for when discharge occurs, inspection, training and security procedures, and certification by a licensed Professional Engineer [40 CFR 112.7]. The most recent revision occurred in August of 2023.

Contingency Plan:

The facility maintains a full contingency plan that includes emergency contact information, an evacuation map, and emergency response and preparedness procedures [40 CFR 279.52(b)(2)]. The most recent revision occurred in August of 2023. The facility reviews the contingency plan but does not have written documentation of the date of the annual review. Compliance assistance was provided onsite and in the exit interview to document the date of review per the facilities' permits 54228-010-HO & 54228-011-SO Part II Subpart A – General Operating Conditions #4e (62-710.800(2) F.A.C.).

The facility has a designated emergency coordinator that is available on site or on call [40 CFR 279.52(b)(5)]. The primary emergency coordinator is Craig Gregory, Director of Operations.

Personnel Training:

All employees receive hazardous waste and used oil training, which includes training on the proper handling of hazardous waste, used oil handling, storage, and spill cleanup. The facility also maintains records of the Used Oil Transporter certification and the hazardous waste transporter training for each of their employees. Individual personnel training certifications and a list of employees with the training provided to each were available for inspector review.

Manifest Records:

The facility has not generated any hazardous waste within the past three years [62-730.030(2) FAC].

Acceptance and delivery records for transportation of all hazardous waste for the past three years were available for review [40 CFR 263.22]. Based on the records review, WPC did not exceed the 24-hour storage limit for hazardous waste transporters.

Acceptance and delivery records for used oil, used oil filters, oily water, oily solids and PCW activities for the past three years were available for review. Records of disposal appropriately demonstrated the name, address and EPAID of the generator, transporter, and receiving facility, the date of shipment, and quantity of used oil acceptance [40 CFR 279.46 & 56]. Halogen tests are documented on all manifests demonstrating used oil shipments. The waste description of used oil is listed as "Non-DOT regulated on spec used oil." The Certificate of Analyses provided by Universal Environmental Services were available for recycled fuel oil, as well as Laboratory Reports for testing of oil provided by Summit Environmental Technologies. Crushed used oil filters are shipped as "Processed Cubed Filters" to Trademark Metals Recycling.

Documentation of processed solid waste disposal including absorbents, rags, and other oily solids was provided. This waste is accepted by Waste Management – Monarch Hill Landfill.

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WPC utilizes Veolia Environmental Services for the recycling of universal waste lamps. Documentation in the form of Certificates of Acceptance for Recycling and/or Disposal was provided.

Analysis Plan:

The facility maintains a complete analysis plan that requires halogen testing and pH testing for incoming shipments [40 CFR 279.55].

Annual Reports:

The last three years of the facility's annual reports required by 62-710.510(5) were available for review. The most recent report was submitted along with EPA form 8700-12 and certificates of liability insurance in March 2024.

Financial Assurance:

The facility was able to provide proof of financial assurance and tank insurance.

Closure Plan:

The closure plan and closure cost estimates for the facility were available for review [62-710.800(5) F.A.C.].

Inspections:

The facility was able to provide tank and secondary containment inspection logs.

Permits:

The facility prominently displayed all permits and licenses from the Department and Broward County inside of the facilities office building. The office building is not located in the same area as the permitted worksite. Compliance assistance was provided on site and in the exit interview to keep a copy of the facilities permit at the worksite of the permitted activity per the facilities' permits 54228-010-HO & 54228-011-SO Part I – General and Standard Conditions #7(62-710.800(2) F.A.C.).

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	279.22(c)(1), 62-710.401(6)
Explanation:	Inspectors observed one 5-gallon bucket and one 55-gallon drum not labeled with the words "used oil".
Corrective Action:	The facility should label all containers of used oil with the words "used oil".

Comments:

Corrective actions provided on 11/04/2024.

Photo Attachments:

Incorrect Labeling



Type:	Violation
Rule:	279.54(d)(2), 62-710.800(2)
Explanation:	<p>The facilities permit (54228-010-HO & 54228-011-SO Part II Subpart B - Used Oil Conditions #8) states that facility should repair any cracks or gaps in the secondary containment floor and perimeter walls prior to resuming operation. 40 CFR 279.54(d)(2) states that the entire containment system must be sufficiently impervious to used oil.</p> <p>Inspectors observed the tank farm secondary containment with cracks and deteriorated epoxy sealant.</p>
Corrective Action:	The facility should repair the cracks and reseal the secondary containment to make it sufficiently impervious to used oil.

Comments:

The facilities proposed timeline for repairs was approved on 11/04/2024. Corrective actions were completed and provided to the department on 11/25/2024.

Photo Attachments:

Damaged Secondary Containment



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Type: Violation
Rule: 62-710.800(2)
Explanation: The facilities' permit (54228-010-HO & 54228-011-SO Part II Subpart E - Non-Hazardous, Non-Used Oil Waste Conditions #8) states that containers with processed waste shall be clearly labeled "Processed Solid Waste".
Inspectors observed one 20-cubic yard roll-off container of processed solid waste not labeled with the words "Processed Solid Waste".
Corrective Action: The facility should label the roll-off container with the words "Processed Solid Waste".

Comments:

Corrective actions provided on 11/04/2024.

Photo Attachments:

Incorrect Labeling



Type: Violation
Rule: 62-710.800(2)
Explanation: The facilities' permit (54228-010-HO & 54228-011-SO Part II Subpart A – General Operating Conditions #4e) states “The Permittee shall perform at a minimum, an annual review of the Contingency Plan to ensure that it is up to date and contains current information. The date of review should be noted in the written operating record at the facility.” The facility does not note the date of review.
Corrective Action: The facility should note the date of the annual review of the contingency plan in the written operating record at the facility.

Comments:

Corrective actions provided on 11/04/2024.

Type: Violation
Rule: 62-710.800(2)
Explanation: The facilities' permit (54228-010-HO & 54228-011-SO Part I - General and Standard Conditions #7) states that a copy of this permit shall be kept at the worksite of the permitted activity. At the time of the inspection, the facility did not have the permit available at the worksite.
Corrective Action: The facility should keep a copy of this permit at the worksite of the permitted activity.

Comments:

Corrective actions provided on 11/04/2024.

PHOTO ATTACHMENTS:

Facility



Used Oil Filter Processing



Tank Farm



Conclusion:

World Petroleum Corp was inspected as a used oil processor, transporter, transfer facility, and marketer; a used oil filter processor, transporter, and transfer facility; a hazardous waste and petroleum contact water (PCW) transporter; and a small quantity handler of universal waste and was found to be out of compliance for the following:

- 40 CFR 279.22(c)(1), 62-710.401(6) F.A.C. – Failure to label containers with the words “used oil”.
- 40 CFR 279.54(d)(2), 62-710.800(2) F.A.C. – Failure to comply with permit requirements to repair any crack or gaps in the secondary containment and failure to maintain secondary containment system to be impervious to used oil.
- 62-710.800(2) F.A.C. – Failure to comply with permit requirements to label containers of processed waste with the words “processed solid waste”.
- 62-710.800(2) F.A.C. – Failure to comply with permit requirements to document the date of the contingency plans annual review.
- 62-710.800(2) F.A.C. – Failure to comply with permit requirements to keep a copy of the permit at the worksite.

On 11/04/2024, the facility submitted all corrective action except for proof of resealing the facilities secondary containment. The Department approved the facilities request for an extension for submitting the final corrective action by 12/20/2024.

On 11/25/2024, the facility submitted the remaining corrective actions and have since returned to compliance.

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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	✓		

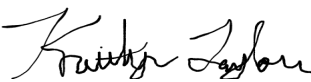
Inspection Date: 10/30/2024

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

Kaitlyn Taylor
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

12/02/2024
Date

Jade Knight
Inspector Name

Environmental Specialist III
Inspector Title

DEP
Organization

Chad Gregory
Representative Name

Director of Operations
Representative Title

World Petroleum Corp
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.

Andrea Miranda
Representative Name

Secretary
Representative Title

World Petroleum Corp
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: Bailey Daniels

Inspection Approval Date: 12/02/2024