



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

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**FACILITY INFORMATION:**

**Facility Name:** Chem Klean Corp

**On-Site Inspection Start Date:** 11/05/2024

**On-Site Inspection End Date:** 11/05/2024

**ME ID#:** 133345

**EPA ID#:** FLR000231258

**Facility Street Address:** 9330 NW 100th St, Medley, Florida 33178-1419

**Contact Mailing Address:** PO Box 821263, Pembroke Pines, Florida 33082-1263

**County Name:** Miami-Dade

**Contact Phone:** (305) 863-7807

**NOTIFIED AS:**

Non-Handler, Transfer Facility, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **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 Hazardous Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Jade Knight, Inspector

Other Participants: Shelby Luong, Environmental Specialist II, Nicolas Ramos, President, Christian Ramos, Vice President

**LATITUDE / LONGITUDE:** Lat 25° 51' 47.304" / Long 80° 20' 58.524"

**NAIC:** 484110 - General Freight Trucking, Local

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On November 5, 2024 (11/05/2024), Jade Knight with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Inspection (CEI) at Chem Klean Corp (hereinafter referred to as CK or facility), located at 9330 NW 100th St, Medley, FL 33178. CK 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 inspector was accompanied by Shelby Luong, Environmental Specialist II from the FDEP.

The inspectors were escorted around the facility by Nicolas Ramos, CK President, and Christian Ramos, CK Vice President. Upon arrival at the facility the inspectors presented their credentials and explained the purpose of the inspection.

CK occupies 106,000 square feet and is connected to public water and sewer. The facility has been operating at its current location since May 2019, and employs 8 staff. The facility operates Monday to Friday from 8 a.m. to 5 p.m.

**Notification History:**

CK initially notified with the Department as a Hazardous Waste Transporter (TRA), Used Oil Transporter (UOT), Used Oil Filter Transporter (UOFT), Florida Universal Pharmaceutical Waste (UPW) Transporter, and For-Hire Universal Waste Mercury-Containing Lamps/Devices on 05/16/2019. The facility was assigned the EPA Identification (EPAID) Number FLR000231258. The facility most recently notified as a UPW Transporter, Mercury-Containing Lamps Small Quantity Handler (SQH), For-Hire Universal Waste Mercury-Containing Lamps

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/Devices Transporter and Transfer Facility, Hazardous Waste TRA and Transfer Facility, UOT and Used Oil Transfer Facility, and UOFT and Transfer Facility on 03/13/2024. Along with the renotifications the facility had attached used oil annual reports on time to The Department.

**Inspection History:**

The facility was previously inspected by the Department on 05/20/2021 as a TRA, UOT, and Used Oil Transfer Facility and was found to be in-compliance at the time of inspection.

Safety glasses and steel-toed boots were the only Personal Protective Equipment (PPE) required to enter the facility at the time of the inspection. The representatives stated that if the forklift was currently in operation, then personnel would additionally be required to wear a hard hat and potentially protective gloves.

**Process Description:**

CK is a 24/7 emergency hazardous waste disposal service transporter, used oil and used oil filter transporter and transfer facility, and a universal waste (UW) transporter for industries such as aviation, automotive, manufacturing, industrial, dry cleaners, print shops, and universities. The facility doesn't generate any waste of their own and does not currently act as a transfer facility of hazardous waste. The representative informed inspectors that the facility maintains the transfer facility certification for when the facility intends to start the 10-day storage, but does not intend to start being a transfer facility any time soon. The facility provides transportation services such as hazardous waste removal, industrial waste disposal, used oil and used oil filter, waste-to-energy, UW recycling, and vacuum truck.

The facility has three 24-foot box trucks used for transporting waste. Every truck has Department of Transportation (DOT) placards displayed on the sides of the trucks. CK keeps copies of the permits, notifications, contingency plan (in case of emergency), and manifests on the truck. Also, the trucks are properly identified for their corresponding wastes and have fire extinguishers and spill kits available.

At the time of the inspection the following areas were observed:

**Offices:**

No waste is stored inside this area. All records are maintained and view by inspectors in this area at the time of the inspection.

**Warehouse:**

The warehouse has one bay door used for loading the trucks with new supplies and off-loading waste for storage until transported to next facility. The door to the warehouse from the office area had a posted sign of required PPE needed, Safety Data Sheet (SDS) binder, and emergency eye wash station.

Along the wall, on the right side of the bay door, was the waste storage area where secondary containment aligned all the wall storing waste. All drums were closed, labeled, and in good condition unless otherwise stated. The following was observed:

- 8 metal 55-gallon drums of "Used Oil". The storage area's wall was labeled "Used Oil".
- 1 metal 55-gallon drum of "Turbo Oil" with the used oil section. The representatives informed the inspectors that the facility sends it out as used oil.
- 2 plastic 5-gallon containers of "Hazardous Waste – UN1993 Waste Flammable Liquids (Xylene)" on their own secondary containment. The representatives informed inspectors the only time hazardous waste might be in the area is if there was a pickup in the middle of the night or late hours and would be transported in the morning, still within the 24-hours.
- 26 metal 55-gallon drums and 1 metal 275-gallon container of various non-RCRA materials such as oily water and wastewater with 5% coolant.
- Liquid was observed in most of the secondary containment with spilled used oil through pumping.

Compliance assistance was provided on-site and in the exit interview to provide photos of secondary containment cleaned out [62-710.401(6) F.A.C.] and turbo oil drum labeled "Used Oil" [62-710.401(6) F.A.C.].

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Packing of hazardous waste containers were compliant with 40 CFR 262.30 [40 CFR 263.12(a)]. Containers were observed to be closed, in good condition, and incompatible waste were not placed in the same container [40 CFR 265.172-177]. The facility maintained adequate aisle space between containers in this area [40 CFR 265.35].

The remainder of the warehouse is used for products and empty drums.

The facility only store used oil and used oil filters on-site for over 24-hours, which get picked up on a monthly basis. A second registered used oil and used oil filter transporter pumps the used oil from the drums at the site. Oily water and the various other non-RCRA materials get pumped by another transporter from this site's location.

#### Records Review

##### Manifests:

Hazardous waste manifests were available onsite for at least three years [40 CFR 263.22(a)]. The facility uses the Hazardous Waste Electronic Manifest (E-Manifest) System and maintains all final signed copies of the manifests. The facility maintains all documentation of reconciliation or noncompliance with the RCRA requirements. The facility ensures that proper waste analyses are conducted prior to disposal [40 CFR 263.20]. No discrepancies were observed.

Used oil and used oil filter acceptance [40 CFR 279.46(a)] and delivery [40 CFR 279.46(b)] manifests were available for review onsite for at least three years [40 CFR 279.46(d)]. Manifest displayed that the facility was storing for more than 24-hours but less than 35-days [62-710.201(11) F.A.C.]. The final designated facility is Raider Environmental Services (EPA ID FLR000143891) or to EMC Oil (EPA ID FLR000000166). Every manifest document the halogen screening results. The facility utilizes a Sniffer test or a ChorD-Tect 1000 Dextsil test, if used oil were to exceed 1,000 ppm total halogens it would be managed as HW or rejected by the facility on the generator's site.

The facility maintains three years of universal waste non-hazardous waste manifests onsite for review. No discrepancies were observed and confirmed the facility is a Small Quantity Handler (SQH) of mercury-containing lamps.

##### Inventory logs:

The facility is registered as a transfer facility of hazardous waste but has not yet started operations as such. The representatives informed inspectors they don't intend to being those operations anytime soon. Thus, the facility does not have an inventory log of all hazardous waste that enters and leaves the transfer facility [Rule 62-730.171(6).] Outreach was provided on-site and in the exit interview that once the facility begins operating as such to ensure these records include the manifest tracking number for each shipment, the date when all hazardous waste leaves and enters the facility, the generators name and EPA Identification number (or name and address for generators who are VSQG's), and the amounts of hazardous waste and all associated waste codes.

Based on the manifest, the facility is only operating as a transporter for hazardous waste and does comply with the 24-hour transportation time limit and does not meet the definition of a transfer facility [40 CFR 263.12(a), Rule 62-730.171(2)(a) F.A.C.].

##### General Facility Standards:

The facility was compliant with the general facility standards described in 40 CFR 265, Subpart B [Rule 62-730.171(4)(a), F.A.C.] The facility does maintain 24-hour surveillance and has barriers to deter and prevent unauthorized access [40 CFR 265.14].

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**Contingency Plan and Emergency Procedures:**

The facility maintains a full contingency plan and Spill Prevention Control and Countermeasure (SPCC) plan on-site [Rule 62-730.171(4)(a); 40 CFR 265.53(a)]. The plan describes the actions that facility personnel must take in order to respond to an emergency, the arrangements made with the local emergency response organizations, lists the names, addresses, and phone numbers of the emergency coordinators, lists all emergency equipment at the facility and the physical location, and includes an evacuation plan [40 CFR 265.52]. The primary emergency coordinator is Nicolas Ramos, CK President [40 CFR 265.55]. The annual review of the contingency plan occurred on 03/11/2024. The facility has never been required to implement the contingency plan.

**Preparedness and Prevention:**

The facility maintains external and internal alarm systems, fire control, spill control, and decontamination equipment, and automatic sprinkler systems throughout the facility [40 CFR 265.32]. All alarms and equipment are inspected periodically and maintained to ensure proper operation in time of an emergency [40 CFR 265.33]. All personnel have immediate access to communications and alarm systems in the event of an emergency [40 CFR 265.34]. As the facility is not yet operating as a hazardous waste transfer facility, they have not yet made arrangements with local authorities. Outreach was provided on-site and in the exit interview that once they decide to begin operating as a transfer facility to make arrangements with local authorities.

**Training:**

All employees receive an initial and annual review of the hazardous waste management procedures relevant to the positions in which they are employed [40 CFR 265.16(a-b)]. The facility maintains the required job descriptions and list of personnel that are handling hazardous waste [40 CFR 265.16(d)]. The annual training covers laws and regulations pertaining to HW and used oil transporters under the Florida Administrative Code and the Federal Regulations, spill avoidance and emergency response procedures, and halogen testing. A DEP approved PowerPoint presentation on used oil transportation is also used for in-house training. Last in-house training was conducted on 05/16/2024.

All employees handling HW and used oil receive an 8-hour Hazwoper refresher course from USF OTI Education Center. This training includes the RCRA rules for proper transportation of HW within the state of Florida.

**Liability Insurance:**

The facility provided a Hazardous Waste and Used Oil Facility Certificate of Liability Insurance issued by Gorin Insurance Inc under policy number G71474100-006. The Policy period is 12/20/2023 to 12/20/2024. The coverage applies at sudden accidental occurrences and limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate.

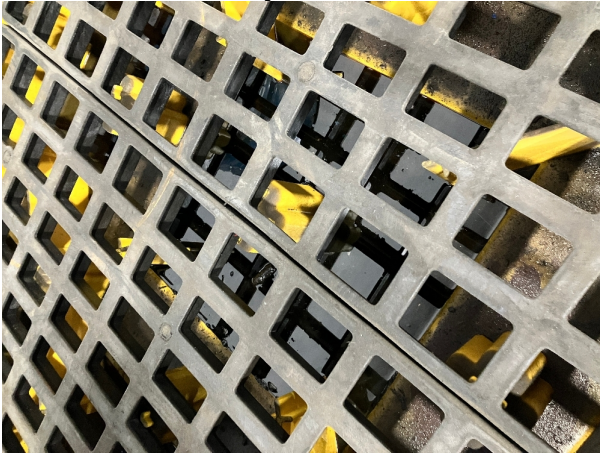
**New Potential Violations and Areas of Concern:****Violations**

Type:	Violation
Rule:	62-710.401(6)
Explanation:	At the time of the inspection the secondary containment had used oil in it and made it not meet the 110% capacity, additionally one drum of used oil was labeled "Turbo Oil".
Corrective Action:	Compliance assistance was provided on-site and in the exit interview to provide photos of secondary containment cleaned out and photo of drum labeled "Used Oil".

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**PHOTO ATTACHMENTS:**

Used oil in secondary containment.



Hazardous waste containers.



Improperly labeled used oil drum.



Safety Equipment



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### Conclusion:

CK was inspected as a UPW Transporter, Mercury-Containing Lamps Small Quantity Handler (SQH), For-Hire Universal Waste Mercury-Containing Lamps/Devices Transporter and Transfer Facility, Hazardous Waste TRA and Transfer Facility, UOT and Used Oil Transfer Facility, and UOFT and Transfer Facility and was found to be out of compliance for failing to maintain secondary containment to ensure it meet the 110% capacity [62-710.401 (6) F.A.C.] and to label "turbo oil" drum with the words "Used Oil" [62-710.401(6) F.A.C.]. An exit interview was sent out on 11/06/2024 and was provided a deadline of 11/20/2024.

On 11/11/2024 the facility provided requested documents and provided photos of the secondary containment cleaned out. The Department is awaiting on the photo of the drum labeled "Used Oil". Once the facility provides the final request a return to compliance letter will be sent.



**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)	✓		
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)			✓
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)			✓
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) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
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)	✓		
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)	✓		
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)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
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)			✓
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)			✓
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)	✓		
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 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)			✓
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)			✓
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)			✓
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)			✓
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)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
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)			✓
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)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
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 recalculation (tolling) agreement per 262.20(e)? 263.20(h)(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) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
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)			✓
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)			✓
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)			✓

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



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

Jade Knight  
Principal Investigator Name

Inspector  
Principal Investigator Title

  
Principal Investigator Signature

DEP  
Organization

12/11/2024  
Date

Shelby Luong  
Inspector Name

Environmental Specialist II  
Inspector Title

FDEP  
Organization

Nicolas Ramos  
Representative Name

President  
Representative Title

Chem Klean  
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.

Christian Ramos  
Representative Name

Vice President  
Representative Title

Chem Klean  
Organization

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Report Approvers:

Approver: Bailey Daniels

Inspection Approval Date: 12/13/2024