



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

FACILITY INFORMATION:

Facility Name: Sporco Solutions LLC

On-Site Inspection Start Date: 01/22/2025

On-Site Inspection End Date: 01/22/2025

ME ID#: 159540

EPA ID#: FLR000262832

Facility Street Address: 1595 Cassius St, Lutz, Florida 33549-5461

Contact Mailing Address: 1595 Cassius St, Lutz, Florida 33549

County Name: Pasco

Contact Phone: (727) 433-2278

NOTIFIED AS:

Non-Handler

WASTE ACTIVITIES:

Generator: Non-Handler

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Coral Evans, Inspector

Other Participants: Devon Garnett, Chief Executive Officer, Lauren Ballard, Environmental Specialist II

LATITUDE / LONGITUDE: Lat 28° 8' 7.08" / Long 82° 26' 49.56"

NAIC: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

TYPE OF OWNERSHIP: Private

Introduction:

Sporco Solutions, LLC., was inspected by the Florida Department of Environmental Protection (Department) on January 22, 2025, to determine the facility's compliance with state and federal hazardous waste regulations governing Used Oil Transporters (UOT). The facility initially notified the Department as an UOT on December 12, 2023. This was the Department's first inspection of this facility. The inspectors were accompanied by Devon Garnett, Chief Executive Officer (CEO).

NOTIFICATION/REGISTRATION

- The current UOT registration expires on June 30, 2025.

The facility is currently registered as a UOT and a Hazardous Waste Transporter (HWT) located at 1595 Cassius St., Lutz FL, 33549. Facility personnel stated the company does not haul hazardous waste and is not located at the single-family residence listed on the initial 8700-12 FL Notification Form. Department inspectors explained the importance of having accurate information incorporated in their registration forms whenever there is a change in operations or locations.

Process Description:

Sporco Solutions, LLC. (Sporco) services elevators for businesses throughout the Tampa Bay area. The facility is located inside a storage unit located at 14615 U.S. 19 S. (unit# B-17), Hudson FL, 34607. The facility includes a small storage unit equipped with a bay door. The bay is used for hauling Used Oil (UO) in and out of the building by vehicle. Currently, there is one employee, and one service has been conducted and will continue to service customers on an as-needed basis. The facility had adequate safety equipment and fire extinguishers.

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At the time of the inspection, the following was observed in the unit:

- One full 250-gallon tote and one partially full 250-gallon tote of used oil; both were properly labeled with the words "Used Oil," however, secondary containment was not provided (see attached photos).

The facility representative stated that both 250-gallon totes have been on-site since November 21, 2024. Department personnel explained that UOT are not allowed to store used oil on-site for no more than 24 hours. In an electronic correspondence dated January 30, 2025, the facility provided the Department with an updated 8700 12-FL Notification Form to change their status from UOT to Used Oil Transfer facility. Please note this will allow the facility to store used oil on-site for no more than 35 days.

Additionally, multiple empty metal 55-gallon drums and 250-gallon totes labeled with the words "Used Oil" were observed.

According to facility personnel, the total halogen content of used oil being transported and stored is not being determined to ensure that it is less than 1,000 ppm.

FACILITY STATUS

On January 30, 2025, the facility provided the Department with documentation via email that an updated 8700-12FL Notification Form was completed to reflect the current location and operations taking place. The NAICS code 562112- Hazardous Waste Collection has been modified to 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance. The facility has renotified as a Used Oil Transfer station and has updated the current address. The facility shall submit an 8700-12FL Notification Form if any change in operation is deemed necessary.

RECORDS

At the time of inspection, Sporco was notified as a UOT, and they were inspected as such. The Department conducted a review of all available documentation generated since Sporoco began operation on November 21, 2024.

- Used oil delivery records: The last three years of customer service receipts were reviewed. Records were reviewed and appeared to be complete. The most recent and only shipment of used oil was on November 21, 2024, for 1,000 gallons of used oil. Facility personnel stated that HOWCO Environmental Services (EPA ID# FLD152764767) transported most of the used oil on November 21, 2024, and Sporco transported the excess used oil to their storage unit located at 14615 U.S 19 S. (unit# B-17).
- Used oil filter delivery records: The facility does not collect or transport used oil filters.
- Employee training records: Annual training on the proper management of used oil, including handling, storage, spill response and cleanup were not available for review.
- Annual report: Please be reminded the facility shall register annually with the Department and comply with the annual reporting and record keeping requirements pursuant to Rules 62-710.500 and 62-710.510, F.A.C.

Additionally, the facility is required to submit an annual certification in conjunction with the annual registration, which states that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, has an annual and new employees training program in place covering the applicable rules that is still operating and is being adhered to and is annually reviewed and updated to address changes in regulations which apply to the operation, and which provides an explanation of any modifications to the training program.

- Used oil transporter facility registration is current through June 30, 2025. The facility's insurance/financial assurance is current and adequate.

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

Type:	Violation
Rule:	279.44(a), 279.44(b)
Explanation:	<p>At the time of the inspection, the transporter failed to determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.</p> <p>As per 40 Code of Federal Regulations (CFR) 279.44(a), which states, in part, to ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b) (1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.</p> <p>As per 40 Code of Federal Regulations (CFR) 279.44(b), which states, in part, the transporter must make this determination by:</p> <ul style="list-style-type: none">(1) Testing the used oil; or(2) Applying knowledge of the halogen content of the used oil in light of the materials or processes used.
Corrective Action:	<p>CORRECTED: On January 30, 2025, the facility provided the Department with photo documentation that a Standard Operating Procedure (SOP) for testing the used oil has been implemented.</p>

Type:	Violation
Rule:	62-710.201(11)
Explanation:	<p>At the time of the inspection, used oil was observed onsite. Facility personnel stated used oil has been held onsite for more than 24 hours (since November 21, 2024).</p> <p>As per 62-710.201(11) Florida Administrative Code (F.A.C.), "Used oil transfer facility" means any transportation related facility including loading docks, parking areas, and other areas where shipments of used oil are held for more than 24 hours during the normal course of transportation over public highways. Transfer facilities that store used oil for more than 35 days are "processors" as defined in subsection 62-710.201(3), F.A.C., and are subject to regulation under subpart F of 40 C.F.R. Part 279.</p>
Corrective Action:	<p>CORRECTED: On January 30, 2025, the facility provided the Department with documentation that Crystal Clean, LLC. (EPA ID# ILR000130062) took samples of the UO on January 27, 2025, and will ship it off-site within the next week. The used oil was shipped off site on February 10, 2025, according to the pick up receipt provided via email on February 11, 2025.</p>

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Type: Violation
Rule: **62-710.401(6)**
Explanation: At the time of the inspection, one full 250-gallon tote and one partially full 250-gallon tote of used oil were observed not provided with secondary containment.

As per 62-710.401(6) Florida Administrative Code (F.A.C.), which states, in part, no person may store used oil in tanks or containers unless they are clearly labeled with the words "used oil," are in good condition (no severe rusting, apparent structural defects or deterioration), and not leaking (no visible leaks). If tanks or containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather. If tanks or containers are not double-walled, they shall be stored on an oil-impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area. For underground storage tanks with capacities greater than 110 gallons and above ground storage tanks with capacities greater than 550 gallons, the facility shall comply with Chapters 62-761 and 62-762, F.A.C.

Corrective Action: CORRECTED: On January 30, 2025, the facility provided the Department with photo documentation that the storage unit is now provided with adequate secondary containment.

Photo Attachments:

Storage unit now provided with secondary containment



Type: Violation
Rule: **62-710.500(4)**
Explanation: At the time of the inspection, a valid registration form and identification number was not observed displayed in a prominent place.

As per 62-710.500(4) Florida Administrative Code (F.A.C.), which states, in part, each registered person shall display the validated registration form and identification number in a prominent place at each facility location.

Corrective Action: CORRECTED: On January 30, 2025, the facility provided the Department with photo documentation that a valid registration form and identification number are now displayed in a prominent place.

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Photo Attachments:

Registration form and identification number binder



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Type: Violation
Rule: 62-710.600(2)
Explanation: At the time of the inspection, annual employee training records were not available for review.

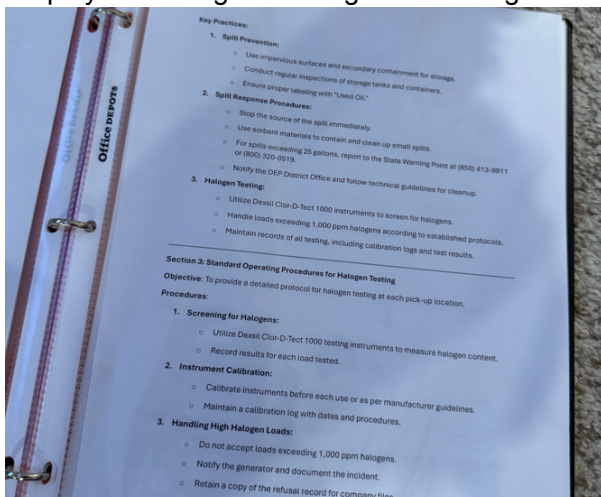
As per 62-710.600(2) Florida Administrative Code (F.A.C.), which states, in part, to become certified and to maintain certification, used oil transporters shall:

- (a) Register annually with the Department and comply with the annual reporting and record keeping requirements pursuant to Rules 62-710.500 and 62-710.510, F.A.C.;
- (b) Show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a certification that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, and has an annual and new employees training program in place covering the applicable rules;
- (c) Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of three years and available for review by Department personnel during inspections;
- (d) Submit to the Department an annual certification in conjunction with the annual registration required under Rule 62-710.500, F.A.C., which states that the used oil transporter is familiar with applicable Florida and federal laws and rules governing used oil transportation, has an annual and new employees training program in place covering the applicable rules that is still operating and is being adhered to and is annually reviewed and updated to address changes in regulations which apply to the operation, and which provides an explanation of any modifications to the training program; and,
- (e) Have, verify, and maintain vehicle insurance with a combined single limit of no less than \$1,000,000.00. Such insurance, or additional policy, must in no way exclude pollution coverage for sudden and accidental alleged or threatened discharge, dispersal, seepage, migration, release or escape of used oil, and must include any cost or expense relating to pollution damage for which the transporter is legally liable. Such insurance must be maintained at all times and be exclusive of legal defense costs.

Corrective Action: CORRECTED: On January 30, 2025, the facility provided the Department with photo documentation that employees have been appropriately trained.

Photo Attachments:

Employee training and halogen screening SOP



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Type:	Violation
Rule:	62-730.150(2)(b)
Question Number:	1.2
Question:	Has the facility notified of change of status? 62-730.150(2)(b)
Explanation:	<p>At the time of the inspection, the facility was registered as a UOT and a Hazardous Waste Transporter (HWT) located at 1595 Cassius St., Lutz FL, 33549.</p> <p>As per 62-730.150(2)(b) F.A.C., which states, in part, all generators, transporters, or persons who own or operate a facility which treats, stores, or disposes of hazardous waste, and everyone required to notify under Rule 62 730.181, F.A.C., shall notify the Department of all changes in status and shall use the “8700-12FL – Florida Notification of Regulated Waste Activity,” Form 62-730.900(1)(b), adopted by reference in paragraph 62-730.150 (2)(a), F.A.C.], to do so. Changes in status include, but are not limited to: changes in the facility name, location, mailing address, business form, ownership or management control of the facility or its operations; ownership of the real property where the facility is located; facility contact person; type of regulated waste activity; changes in the amount of hazardous waste generated per month that put the facility in a different generator category, going out of business; tax default; or petition for bankruptcy protection.</p>
Corrective Action:	<p>CORRECTED: This violation was corrected on January 30, 2025, when the facility provided the Department with documentation via email that the 8700-12FL Notification Form was properly completed and sent to Tallahassee. The NAICS code 562112- Hazardous Waste Collection has been modified to 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance. The facility has renotified as a Used Oil Transfer station and has updated the current address. The facility shall submit an 8700-12FL Notification Form if any change in operation is deemed necessary.</p>

Conclusion:

At the time of the inspection, Sporco Solutions, LLC. was not operating in-compliance with state and federal hazardous waste regulations governing Used Oil Transporters (UOT). However, the facility has completed corrective actions and is now in-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			✓

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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

Coral Evans**Principal Investigator Name**Inspector**Principal Investigator Title****Principal Investigator Signature**DEP**Organization**02/12/2025**Date**Devon Garnett**Representative Name**Chief Executive Officer**Representative Title**Sporco Solutions, 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.

Lauren Ballard**Representative Name**Environmental Specialist II**Representative Title**DEP**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:**Michael Miller**Inspection Approval Date:**02/19/2025