DEPARTMENTAL PROTE

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: ECO Services DBR Inc

On-Site Inspection Start Date: 01/28/2025 On-Site Inspection End Date: 01/28/2025

ME ID#: 131729 **EPA ID#**: FLR000229435

Facility Street Address: 1901 NW 22nd St, Pompano Beach, Florida 33069-1315

Contact Mailing Address: 1901 NW 22nd St, Pompano Beach, Florida 33069-1315

County Name: Broward

Contact Phone: (754) 300-6327

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler Used Oil: On-Spec, Transporter, Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Non-Handler Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shelby Luong, Inspector

Other Participants: Jade Knight, Environmental Specialist III, Amir Sabir, Environmental Specialist II, Blanca

Rocio, President, Alessandra Valdivieso, Assistant

LATITUDE / LONGITUDE: Lat 26° 15' 27.882" / Long 80° 8' 59.118"

NAIC: 531312 - Nonresidential Property Managers

TYPE OF OWNERSHIP: Private

Introduction:

On January 28, 2025 (01/28/2025), Shelby Luong, Environmental Specialist II with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection (CEI) at ECO Services DBR Inc (hereinafter referred to as "ECO DBR" or "facility"), located at 1901 NW 22nd St, Pompano Beach, FL 33069. The inspector was accompanied by Jade Knight, Environmental Specialist III, and Amir Sabir, Environmental Specialist II from the FDEP. ECO DBR 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 Blanca Rocio Rojas, President, and Alessandra Valdivieso, Assistant. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

ECO DBR occupies 4,301 square feet and is connected to public water and sewer. ECO DBR has been operating at its current location since October 2018 and employs 4 staff. The facility operates from Monday through Friday from 8am to 4pm.

Notification History:

ECO DBR initially notified with the Department as Non-Handler of hazardous waste, a Used Oil Transporter (UOT), a Used Oil Filter Transporter, and an on-spec Used Oil Fuel Marketer on 02/05/2019. The facility was assigned the EPA Identification (EPAID) Number FLR000229435. The facility most recently notified with the Department as a UOT, Used Oil Marketer, and Used Oil Filter Transporter on 06/26/2024.

Inspection History:

The facility was most recently inspected as a UOT on 11/06/2019 and was found to be out of compliance. The facility returned to compliance on 11/08/2019.

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

Process Description:

ECO DBR is a facility that transports used oil and used oil filters from other facilities such as automotive shops, aviation, boating companies, and construction sites. The facility consists of office space, a storage bay area, and a truck lot space, where the facility parks its trucks. The facility utilizes one truck to pick up used oil from other facilities. ECO DBR does not generate, manage or transport any hazardous waste.

Office Space:

The office space is where the facility conducts administrative tasks. No 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 used oil 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:

- Nine 55-gallon containers labeled "Used Oil Filters".
- 10 55-gallon containers of used oil filters with no label.
- · One 5-gallon container labeled "Used Oil Filters".
- Five 5-gallon buckets with a used oil residue.

10 of the 19 total containers of used oil filters did not have a "Used Oil Filters" label [Rule 62-710.850(5)(a) F.A. C.] Compliance assistance was provided to label the containers with a "Used Oil Filters" label. After the inspection, inspectors were informed that the five buckets were given to the facility by a customer, not in use by the facility, and have been disposed.

Truck Lot Space:

In this area of the facility, the facility parks the truck, which is used to pump used oil from other facilities. The used oil and used oil filters accepted are then stored in the storage bay area. Inspectors were informed that the facility has four trucks in total, but only one is currently in use as the other trucks either do not transport used oil or are no longer in use.

Records Review:

- Acceptance and Delivery records: The used oil and used oil filters are sent to final destination facility Triumvirate Environmental (Florida), Inc. (FLD981018773) (40 CFR 279.43(a)).
- Liability Insurance: The facility was able to demonstrate financial liability insurance with Atlantic Specialty Insurance Company for \$1,000,000, policy number 7930133530000, expiring 02/04/2025. (Rule 62-710.600(2) (e) F.A.C.).
- Training: The facility does conduct training for facility personnel who handle used oil (Rule 62-710.600(2)(c) F. A.C.)
- 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.).

After the inspection, inspectors were informed that the facility does deliveries to the Used Oil Processor every 2 to 3 days and the used oil is kept on-site for longer than 24 hours, acting as a Used Oil Transfer Facility [Rule 62-710.500(1) F.A.C.] Compliance assistance was provided to either provide a statement of confirmation that the facility will store used oil on site for no more than 24 hours for all future accepted used oil or submit a 8700-12 form to notify as a Used Oil Transfer Facility.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 62-710.500(1)

Explanation: Inspectors were informed that the facility does deliveries to the Used Oil Processor

every 2 to 3 days and the used oil is kept on-site for longer than 24 hours.

Corrective Action: The facility must either provide a statement of confirmation that the facility will store

used oil and used oil filters on site for no more than 24 hours for all future accepted

used oil or submit a 8700-12 form to notify as a Used Oil Transfer Facility.

Type: Violation

Rule: 62-710.850(5)(a)

Explanation: Inspectors observed 10 containers of used oil filters without a "Used Oil Filters"

label.

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

Comments:

On 02/14/2025, the facility provided photo documentation of the containers properly labeled. Corrective action for this violation was completed on 02/14/2025.

Conclusion:

ECO Services DBR 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 notify as a Used Oil Transfer Facility per Rule 62-710.500(1) F.A.C.
- Failure to label 10 55-gallon containers 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 01/31/2025, inspectors sent the exit interview email to request documentation for the facility to return to compliance and given a deadline of 02/14/2025 to provide documentation of corrective actions. On 02/14/2025, the facility sent submittals, however, the acceptance records submittal was unable to be viewed. The Department provided multiple extensions to provide submittals.

On 02/28/2025, the facility provided the acceptance records.

The Department is still awaiting the following documentation:

• Statement of confirmation that the facility will store used oil on site for no more than 24 hours for all future accepted used oil or submit a 8700-12 form to notify as a Used Oil Transfer Facility

The facility will be sent a Compliance Assistance Offer Letter.

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			1

Signed:

Approver:

Bailey Daniels

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	Inspector				
Principal Investigator Name	Principal Investigator Title				
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What he	DEP	03/17/2025			
Principal Investigator Signature	Organization	Date			
Jade Knight	Environment	tal Specialist III			
Inspector Name	Inspector Ti	·			
	DEP				
	Organization	 on			
Amir Sabir	Environment	Environmental Specialist II			
Inspector Name	Inspector Ti	itle			
	DEP				
	Organization	on .			
Blanca Rocio	President				
Representative Name	Representat	tive Title			
	ECO Services DBR Inc				
	Organizatio	on			
NOTE: By signing this document, the Site Roand is not admitting to the accuracy of any o areas of concern.					
Alessandra Valdivieso	Assistant				
Representative Name	Representat	tive Title			
	ECO Service	es DBR Inc			
	Organization	on			
NOTE: By signing this document, the Site Roand is not admitting to the accuracy of any o areas of concern. Report Approvers:					

Inspection Approval Date:

03/19/2025