



Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

December 11, 1998

CERTIFIED MAIL

Z 105 548 630

OCD-HW/E-C-98-0431

Attention: Bob Simmons, Owner
North Florida Oil
Post Office Box 157
Astor, Florida 32102

Lake County - HW
North Florida Oil
December 8, 1998 Meeting

Dear Mr. Simmons:

A follow up inspection was conducted at your facility on December 8, 1998. This site visit was conducted to assess progress with the corrective actions outlined in Warning Letter OWL-HW/E-C-98-0010 and to verify the status of your storage tank certification.

Items discussed during the inspection:

1. A policy for used oil filter drum management was provided which outlines a contingency plan in the event NFO has a backlog of filters waiting to be processed. If downtime exceeds 24 hours, or the volume of filter drums exceeds the capacity of NFO's storage pad, used oil filters will either be shipped to the foundry uncrushed and/or filter drums will not be accepted until the problem is corrected.
2. An on site stationary trailer will be used to store other "non oil filter" waste materials, such as absorbents, as well as empty filter drums. At the time of inspection there were approximately 30 drums being stored inside the trailer which contained filters waiting to be crushed. In addition there were 21 drums of "non oil filter" waste stored on the concrete pad waiting to be moved into the trailer once the drums of oil filters were processed. It was stated that the trailer would be emptied of all oil filter drums waiting to be processed and the "non oil filter" waste would be moved inside the trailer within the next two months. This "non oil filter" solid waste is profiled and disposed of at the waste-to-energy plant operated by *Ogden Martin* in Lake County.
3. It was suggested that NFO maintain a daily log of oil filter drums coming into the facility as well as the number of oil filter drums processed each day.
4. It was stated that all storage tank valves scheduled for repair had been replaced. Certification will be scheduled as soon as possible. NFO is to notify Chris Aoussat, Hazardous Waste Permitting Engineer, with the scheduled date and forward the certifications as soon as they are available.

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5. It was agreed that NFO would develop a cost estimate for facility improvements which could be used to off set penalty dollars outlined in the Warning Letter. This estimate, along with a time schedule, is to be submitted to the Department for approval *no later than January 31, 1999*. In order to off set any penalties assessed, improvements must be completed in a timely matter and be of a nature not already required for the facility to be in compliance.
6. Antifreeze recycling issues were discussed. It was suggested that NFO consider brokering antifreeze for their clients until such time as they can set up a recycling program of their own. A list of antifreeze recycling vendors is enclosed. Please note that this list may not be all inclusive.

Please submit the cost estimate for improvements as soon as they are available. Contact Chris Aoussat with the scheduling and results of you tank certifications. If you have any questions we may be reached at (407) 893-3323.

Sincerely,



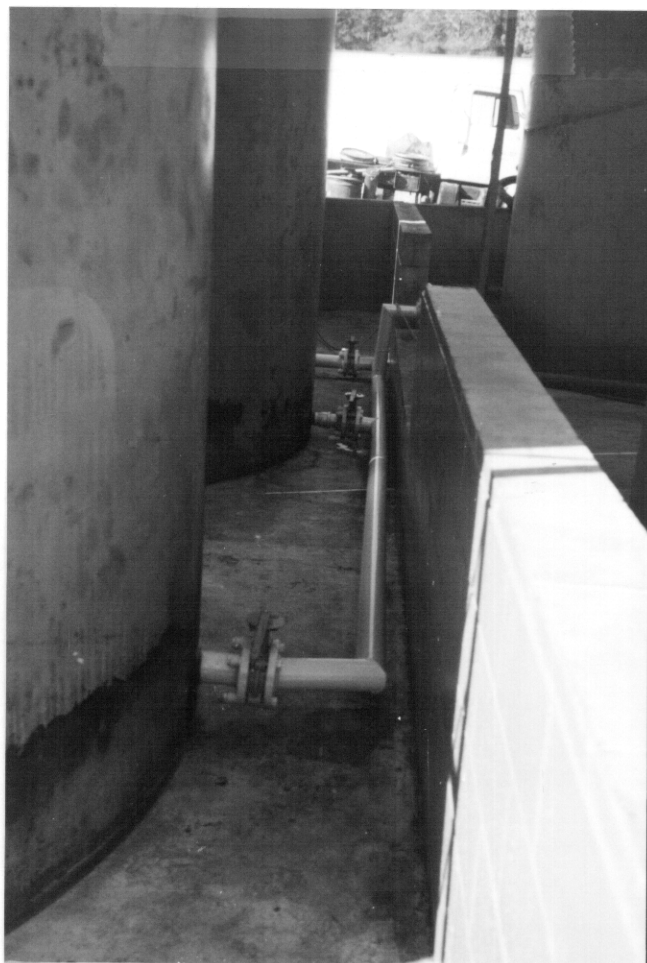
Lu Burson
Environmental Specialist
Hazardous Waste

RTS/lb

cc: Rick Neves, FDEP Tallahassee
NFO Used oil Permitting file



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