



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

FACILITY INFORMATION:

Facility Name: Universal Environmental Solutions LLC
On-Site Inspection Start Date: 02/05/2020 **On-Site Inspection End Date:** 02/05/2020
ME ID#: 108745 **EPA ID#:** FLR000199802
Facility Street Address: 1650 Hemlock St, Tampa, Florida 33605-6602
Contact Mailing Address: 1650 Hemlock St, Tampa, Florida 33605
County Name: Hillsborough **Contact Phone:** (813) 241-9206

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Generator Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Abigail B Bridges, Inspector
Shannon Kennedy, Environmental Manager; Kevin Beckman, DEP Officer; Ed Kinley,
Other Participants: President; John Downer, Safety Manager

LATITUDE / LONGITUDE: Lat 27° 56' 17.0326" / Long 82° 26' 28.1097"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

Universal Environmental Solutions, LLC. (UES), FLR000199802, was inspected by the Florida Department of Environmental Protection (Department) on February 5, 2020, to evaluate the facility's compliance with state and federal used oil processor regulations. UES is a used oil processor and waste water pretreatment facility primarily focused on managing waste from ship bilge and tank cleaning. The facility also transports oily waste generated off site to the facility. The facility has notified as a hazardous waste transporter, however it is not actively soliciting this business and has not transported hazardous waste, according to Ed. Kinley, the facility manager. The facility permit, 330300-HO-001 was issued April 7, 2015 and expires April 7, 2020. Following a change in facility operations, the facility failed to modify their permit. This was later resolved through Consent Order 18-1323. The permit modification went into effect on April 18, 2019 and expires on April 7, 2020.

The facility currently has about 32 full-time employees and employs three driver. The facility has water and sewer service provided by the City of Tampa. Ed Kinley, Chad Jocelyn, and John Downer assisted Department Inspectors throughout the inspection.

Process Description:

UES occupies Berth 247 at the Port of Tampa, where vessels dock for barge and bilge cleaning services. Products cleaned from barge tanks include crude oil and shale oil, as well as commercial fuels. Trucks offload oily water on the Truck Receiving Pad. This pad slopes downward into sumps in order to act as secondary containment and the sumps are pumped daily, as per the permit conditions. From the trucks, oily water is filtered through a filter pot unit, which uses an expanded metal screen to filter out solids. From the filter pot unit, oily water is sent to a series of frac tanks. These are connected in series to act as oil/water separators. After going

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through the frac tanks, the oily water is then sent into the Treatment Warehouse Building.

In the Treatment Warehouse Building, oily water is run through the Dissolved Air Flotation (DAF) Tank. The DAF Tank uses gravity separation and skimming devices to further separate the oil and water. Oil from the DAF Tank is containerized and water from the DAF Tank is treated prior to discharge to the City of Tampa's wastewater treatment plan. Prior to discharging water, samples are tested to ensure that POTW parameter, such as flash point, metals, and pH, are being met.

Located within the Treatment Warehouse Building there were numerous totes and drums of various contents, as well as a roll off. The roll off contained used oil filters and oily rags. The drums consisted of: two drums of oily rags, two drums of scrap metal, one drum of construction debris/concrete, one drum of jet fuel/ kerosene rags, one drum of food waste, one drum of cooking oil, two drums of IWD Soil, and two drums of tank bottoms. Some drums also contained used oil, used antifreeze, and used oil filters. Thirty four totes contained gear oil/lube oil and contaminated diesel. One tote contained Petroleum Contact Water, which was a quarter full. Two totes of lead water were pending analysis prior to making a waste determination.

Totes, tanks, drums, and catch pans were properly labeled. Secondary containment was adequate and no cracking was observed on the Truck Receiving Pad. Containers of used oil, used oil filters, oily water, etc. were closed and stored in a manner that ensured that they were protected from the elements.

Spill kits are located throughout the facility and in every truck. Fire extinguishers and showers were also present on site and appeared to be functional. Each truck is equipped with a halogen meter (TIF XP-1A) and driver training on halogen meter SOPs was presented for Department review. Used oil is checked for high halogen levels upon pickup and again prior to offloading. UES does not claim that any oil meets specification. Outgoing oil is checked for flash point, halogen content and water content only.

Oil transport records included the required information. Inspection records were up to date. Personnel training on Florida's used oil management requirements was up to date for staff, and elements such as HAZWOPER and confined space entry were also documented. Delivery and Acceptance Records were available for review and appeared consistent. The facility submitted their Annual Report on 5/18/2019 and their liability insurance was up to date. UES's SPCC was available for review, and appeared to be current and adequate.

As authorized in the most recent permit, UES's oil plant operation containment area includes additional wastewater treatment capacity for molybdenum removal to meet pretreatment standards. Waste water from the plant is further treated in the water side operation equipment inside the treatment plant building. Treated waste water is discharged to the City of Tampa's Howard Curran treatment plant.

PHOTO ATTACHMENTS:

Properly Label Used Oil Frac Tanks



Conclusion:

At the time of the inspection, Universal Environmental Solutions appeared to be operating in compliance with

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state and federal used oil processor regulations.

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5.0: Used Oil Generator 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.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)			✓
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)			✓
5.16	contain the released oil? 279.22(d)(2)			✓
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)			✓
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)			✓
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)			✓
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)			✓
Item No.	Used Oil Filter Container Management	Yes	No	N/A

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5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)			✓
5.29	contain the released oil? 62-710.850(5)(b)			✓
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)			✓
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 62-710.850(5)(b)4			✓
Item No.	Used Oil Mixtures	Yes	No	N/A
	<input type="checkbox"/> Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	<input type="checkbox"/> Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)			✓
	<input type="checkbox"/> Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)			✓
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)			✓
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)			✓
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)			✓
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)			✓
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards?			✓

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	[Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)			
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)			✓
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)			✓
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)			✓
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)			✓
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)			✓
Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)			✓
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)			✓
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)			✓
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)			✓
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)			✓
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor/re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)			✓
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)			✓
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)			✓
Item No.	Marketing and Processing	Yes	No	N/A
	<input type="checkbox"/> Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40			

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	CFR 279 Subpart H.]			
	<input type="checkbox"/> Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

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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

Abigail B Bridges

Principal Investigator Name

Environmental Specialist I

Principal Investigator Title**Principal Investigator Signature**

FDEP-SWD

Organization

02/24/2020

Date

Shannon Kennedy

Inspector Name

Environmental Manager

Inspector Title

FDEP-SWD

Organization

Kevin Beckman

Inspector Name

DEP Officer

Inspector Title

FDEP-SWD

Organization

Ed Kinely

Representative Name

President

Representative TitleUniversal Environmental
Solutions**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.

John Downer

Representative Name

Safety Manager

Representative TitleUniversal Environmental
Solutions**Organization**

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Report Approvers:

Universal Environmental Solutions LLC Inspection Report

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Approver: Shannon Kennedy

Inspection Approval Date: 02/24/2020