

**From:** Matt Gudorf (Eco-Maxx)  
**To:** Lancellotti, Romina  
**Cc:** Lazaro Mendez; Brian P. Carney  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit Interview  
**Date:** Friday, April 16, 2021 2:47:24 PM  
**Attachments:** image006.png  
image007.png  
image008.png  
image009.png

Hi Romina,

I wanted to respond to the **last item you've requested, #5**. Please let me know if you have any questions. This one will address **OIL FILTERS**.

We have a dedicated day and time to bring oil filters to the US Foundry every week. Depending on if we pick up drums that week or not we average a trip to the Foundry every other week. Our ERP system Acumatica helps us track drums collected by day, week and month. Laz checks the truck levels regularly to make sure we bring them to the Foundry on time.

Months	Apr
Description	(Multiple Items)
Employee Name	Del Rio, Johnny

Row Labels	Filter Containers
2-Apr	4
5-Apr	1
6-Apr	3
7-Apr	6
8-Apr	3
9-Apr	3
12-Apr	1
13-Apr	5
14-Apr	2
15-Apr	
<b>Grand Total</b>	<b>28</b>

Matt Gudorf  
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**Cell:** 716-545-7950  
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**From:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Sent:** Friday, April 16, 2021 2:17 PM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>; Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

I wanted to respond to the **last item you've requested, #5**. Please let me know if you have any questions. This one will address **USED OIL** tracking, next and final email will address **OIL FILTERS**.

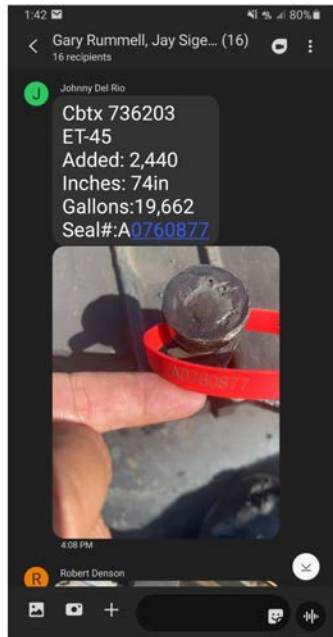
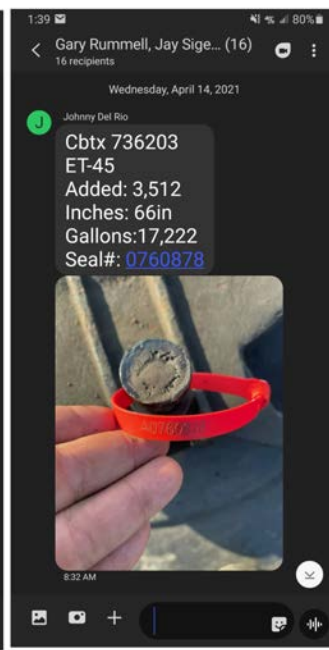
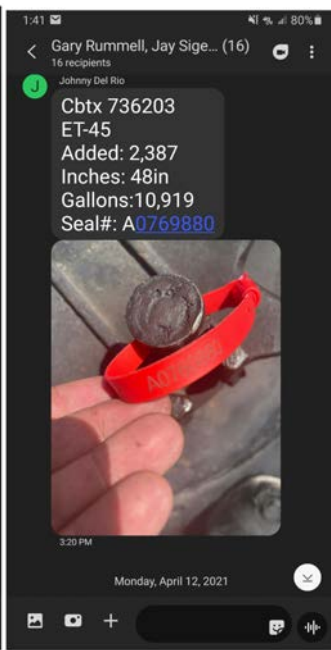
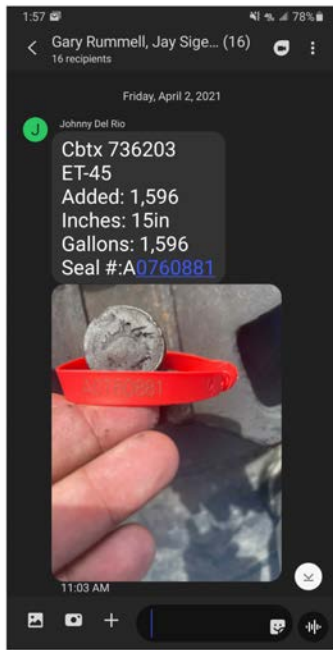
We track used oil gallons and railcars several different ways:

1. Acumatica – Our ERP has a dashboard that enables us to track gallons by hour, by day, week and month. We are able to track gallons on a weekly basis for all facilities.
2. Text Thread – we utilize a text thread that 16 drivers log their offloads every time.
3. New “rail offload” form in Acumatica. Drivers have just started using the offload form in Acumatica so we can eventually stop using the text thread. See attached “OFFLOADS” form we have given to drivers. Johnny started using this form on 4-15-2021.

**We utilize RSI service to track our railcars whether they are shipping to a refinery or staged for loading. See details below. One railcar is on it's way to Noble Oil in Sanford, NC. The other car has been staged for loading since April 1, 2021. It has been idle for 15 days.**

Fleet Path	Equipment	Sight Date	SC	L/E	Sight City	Sight State	Dest City	Dest State	RR	RR ETA	Idle Days
MIAMI:MIAMI USED OIL	GATX030425	04/16/2021 02:45	R	L	JACKSONVI	FL	SANFORD	NC	CSXT	04/21/2021	0
MIAMI:MIAMI USED OIL	CBTX736203	04/01/2021 09:01	Z	E	MIAMI	FL	MEDLEY	FL	FEC		15

**Screenshots below of the Text Thread related to Johnny loading Used Oil into rail. He started loading CBTX736203 on April 2<sup>nd</sup>. As of yesterday, the railcar has just under 20,000 gallons in it. This car will be full by Wednesday the 21<sup>st</sup>. I have attached a strapping chart for that railcar. It shows max capacity of CBTX736203 of 26,192 gallons.**



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**From:** Matt Gudorf (Eco-Maxx)  
**Sent:** Friday, April 16, 2021 12:48 PM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emmax Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please find the attached "samples" requested for item listed below.

**Item 3, Used Oil referenced in your email below.**

Matt Gudorf  
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**From:** Matt Gudorf (Eco-Maxx)  
**Sent:** Friday, April 16, 2021 10:22 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please find the SPCC plan for our transloading operations at 7496 NW 69<sup>th</sup> Ave, Medley, FL.

**Item #11**

Matt Gudorf  
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[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)



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**From:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Sent:** Thursday, April 15, 2021 12:27 PM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>; Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please find attached training signature pages as well as certificates. Please reference the training material I sent you in previous "parts" regarding the annual training in July 2019.

**Item #6, part 4.**

Matt Gudorf  
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**From:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Sent:** Thursday, April 15, 2021 10:23 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>; Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please review information requested.

**Items: 1, 7**

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**From:** Matt Gudorf (Eco-Maxx)  
**Sent:** Thursday, April 15, 2021 9:20 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please review information requested below.

**Item 12 referenced in your email below.**

Vertex Refinery, Marrero, LA  
EPA ID#: **LA0000145797**

Noble Oil, Sanford, NC  
EPA ID#: **NCD9861-72476**

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Hi Romina,

Please review attached documents regarding items listed below.

**Items 9 and 10 referenced in your email below.**

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**From:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Sent:** Thursday, April 15, 2021 8:53 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>; Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

Please find the requested documents regarding filter disposal. We bring filters at a minimum once a week, as much as every two weeks depending on the number of drums collected.

**Item 4 referenced in your email below.**

Matt Gudorf  
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**From:** Matt Gudorf (Eco-Maxx)  
**Sent:** Thursday, April 15, 2021 8:48 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Brian P. Carney <[bpcarney@superiorlubricants.com](mailto:bpcarney@superiorlubricants.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Hi Romina,

This email contains information on our annual reporting to FLDEP. You can see our notification was from our 2019 annual update. Reference the attached email from Janet Ashwood regarding our 2020 update. As soon as the portal has been updated I will submit 2020. Janet has the approved insurance documents, just needs the portal to reflect that.

**Item 2 referenced in your email below.**

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**From:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Sent:** Thursday, April 15, 2021 7:46 AM  
**To:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>; Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Subject:** RE: Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Good morning Romina,

I hope you are well, thank you for your email. It is sad that we had to meet on these circumstances, that someone complained about us. Looking forward to working with you on all of your requests below. I have compiled all of the information with Laz and the Miami team which is extensive. If you are ok with it, I will reply to one or two topics at a time with documentation to keep it organized and minimize the file sizes that I will send you. You will have all information requested by EOD tomorrow.

Just an FYI, Emaxx Miami LLC received both site permits in April 2019. I will provide everything you requested from that time forward. Janet Ashwood from the FLDEP helped us transition the permits from AWS to Emaxx Miami during that time and can be a great source of information if you need it.

One last thing before starting to send information over. Laz told me that the walk through with you was pleasant and you were very helpful. Your feedback on the filter drums was great. I immediately worked with Laz and team on this and updated our drum labeling program throughout all of Eco-Maxx. We discussed the new labels and process on our weekly safety call and shipped the labels. Refer to the attached picture of drums as they were ready to bring to the Foundry on Tuesday. We are labeling every drum and tote with the USED OIL FILTERS label as well as the generator label.

Matt Gudorf  
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**From:** Lancellotti, Romina <[Romina.Lancellotti@FloridaDEP.gov](mailto:Romina.Lancellotti@FloridaDEP.gov)>  
**Sent:** Friday, April 2, 2021 2:20 PM  
**To:** Matt Gudorf (Eco-Maxx) <[mdgudorf@eco-maxx.com](mailto:mdgudorf@eco-maxx.com)>  
**Cc:** Lazaro Mendez <[lmendez@bravofluids.com](mailto:lmendez@bravofluids.com)>  
**Subject:** Emaxx Miami, LLC (EPA ID FLR000223313 & FLR000227546) - Exit interview

Good afternoon Mr. Matthew Gudorf,

This email serves as follow up to the routine compliance evaluation inspection conducted on March 18, 2021, in response to a complaint received by the Florida Department of Environmental Protection (FDEP). I appreciate you and your team for taking the time to conduct the walkthrough of Emaxx Miami, LLC., located at 7400 NW 77<sup>th</sup> Terr, Medley, FL 33166 (EPA ID FLR000223313); and at 7496 NW 69<sup>th</sup> Ave, Medley, FL 33166 (EPA ID FLR000227546). As discussed during the inspection, the facility is required to submit the following documentation to the Department:

1. Provide the liability insurance of the vehicles transporting used oil, which covers the amount of \$1,000,000 that includes pollution liability, per 62-710.600(2) (e) F.A.C.. Please provide records for the last three years. Specially, provide evidence of liability insurance between 10/04/2020 and 03/01/2021.
2. Provide evidence of annual notification to the Department, for the last three years.
3. Please provide samples of bill of lading for pickup of used oil and used oil filters. Provide records for the months of September, October, and November 2018; May, June and July 2019; and November 2020, December 2020 and January 2021.
4. Provide all disposal records for filters for the months of September, October, and November 2018; May, June and July 2019; and November 2020, December 2020 and January 2021.
5. Explain how the facility keeps track of the storage time of used oil and used oil filters.
6. Training certificates for employees. Per 62-710.600(2) F.A.C., any used oil shall 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. The files shall indicate the type of training received along with the dated signature of those receiving and providing the training.

Additionally, for the facility located at 7496 NW 69<sup>th</sup> Ave, Medley, FL 33166 (EPA ID FLR000227546), please provide the following:

7. Provide the liability insurance of the vehicles transporting used oil, which covers the amount of \$1,000,000 that includes pollution liability, per 62-710.600(2) (e) F.A.C.. Please provide records for the last three years. Specially, provide evidence of liability insurance between 10/04/2020 and 03/01/2021.
8. Provide evidence of annual notification to the Department, for the last three years.
9. Please provide a copy of used oil delivery records from rail car to the designated facility. Provide all records for the months of September, October, and November 2018; May, June and July 2019; and November 2020, December 2020 and January 2021.
10. Provide samples of lab results of shipments of used oil for the months of September, October, and November 2018; May, June and July 2019; and November 2020, December 2020 and January 2021.
11. Please provide the Oil Spill Contingency/ SPCC Plan for the facility located at 7496 NW 69<sup>th</sup> Ave, Medley, FL 33166. The Plan shall include emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures.
12. Provide names, addresses and EPA ID numbers of designated facilities that received used oil.

Please submit the requested information within 14 days of this email (**04/16/2021**). If you have any additional questions or concerns, please feel free to contact me via email or at the phone below.

Kind regards,



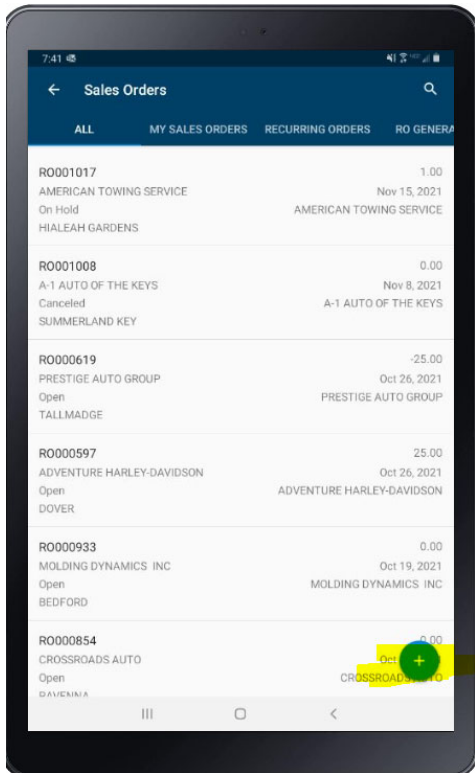
**Romina Lancellotti**  
**Environmental Specialist II**  
Florida Department of Environmental Protection  
Southeast District - West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[Romina.Lancellotti@floridadep.gov](mailto:Romina.Lancellotti@floridadep.gov)  
Office: 561.681.6624

[Dep Customer Survey](#)

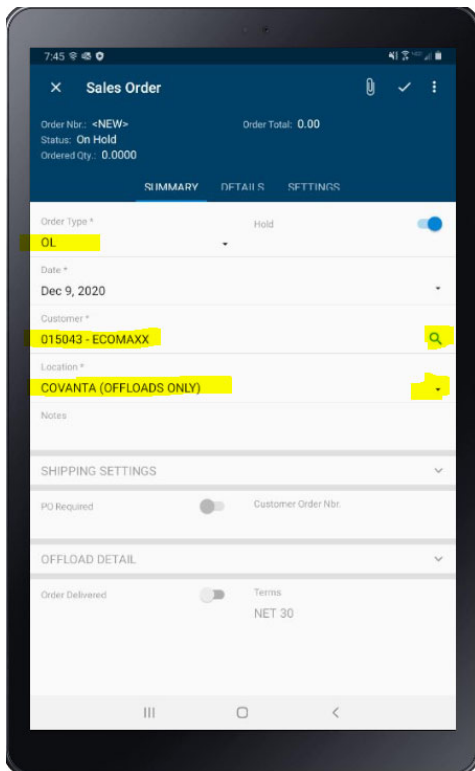


## OFFLOADS

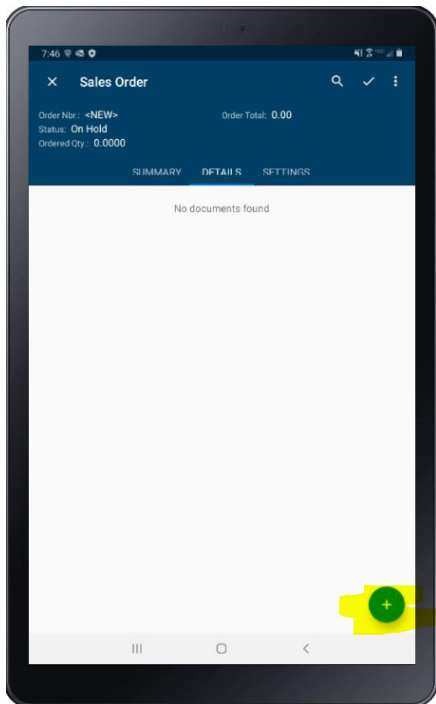
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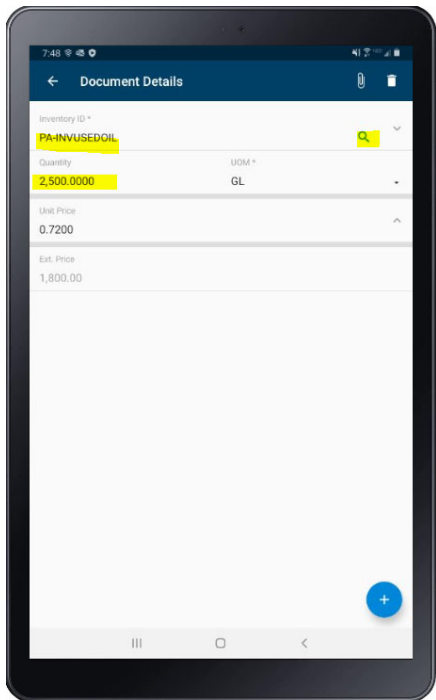
2. Select OL Order Type
3. Select EcoMaxx (015043) as customer
4. Select Location of Offload



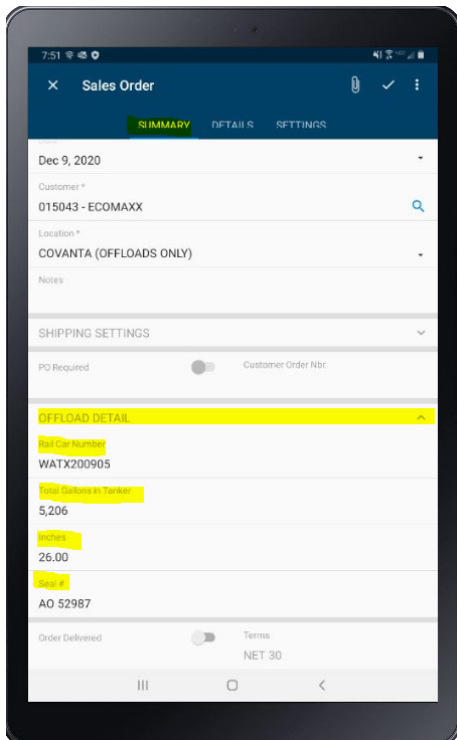
### 5. On Details Tab, enter part number



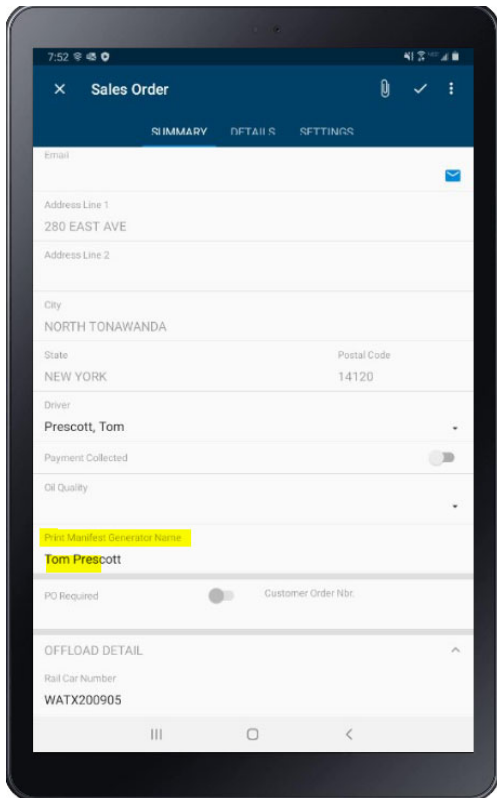
6. Select PA-INVUSED OIL (if ACWO select OH-INVUSED OIL)
7. Enter gallons offloading



8. Back on Summary Tab, click the OFFLOAD DETAIL dropdown
9. Enter Railcar Number
10. Enter Total Gallons in Railcar
11. Enter Inches
12. Enter Seal #



13. Under Shipping Setting enter yourself as the Print Manifest Generator Name



14. Sign yourself

15. Check Order Delivered

16. Press Checkmark to SAVE

CBTX736203

Total Gallon Available		G Inches Remaining "	
26192.19	0	97	0