



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

FACILITY INFORMATION:

Facility Name: Universal Environmental Solutions LLC
On-Site Inspection Start Date: 02/23/2022 **On-Site Inspection End Date:** 02/23/2022
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:** Own Waste, Commercial Waste **Used Oil:** On-Spec, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for VSQG (<100 kg/month) Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Sarah M Green, Inspector
Gina Laddick, Environmental Specialist 1; John Downer, EHS Representative; Chad
Other Participants: Josselyn, Plant Manager; Ed Kinley, President

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

NAIC: 562119 - Other Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted at Universal Environmental Solutions LLC ("UES") on February 23, 2022, by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal regulations for very small quantity generators of hazardous waste ("VSQG") and transporters of used oil and hazardous waste. The facility last notified as a VSQG, hazardous waste transporter, and used oil transporter on January 31, 2022. The facility initially notified as a VSQG and transporters of used oil and hazardous waste in May of 2013. The Department has conducted a number of previous hazardous waste inspections at this facility; the most recent on February 5, 2020. Inspectors were accompanied by John Downer, EHS Representative, Chad Josselyn, Plant Manager, and Ed Kinley, President, during the inspection.

Process Description:

UES is a registered transporter of used oil and hazardous waste. While the facility has notified as a hazardous waste transporter, it is not actively soliciting this business and has not transported hazardous waste recently. The facility employs approximately 32 individuals including office staff and drivers. Water and sewer services are provided through City of Tampa.

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 towards several sumps which allows the pad to provide secondary containment. The sumps are pumped daily as per the permit conditions. From the pump out trucks, oily water is filtered through a filter pot unit, which uses an expanded metal screen to filter out solids. From the

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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 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 system. Prior to discharging water, samples are tested to ensure that POTW parameter, such as flash point, metals, and pH, are being met in accordance with their Industrial Wastewater Pretreatment Permit (#1112) from the City of Tampa.

Located within the Treatment Warehouse Building there were numerous totes and drums of various contents, as well as one roll off. At the time of the inspection the wastes present included:

- One roll off of oily rags and other waste going to the incinerator.
- One 55-gallon metal drum of hazardous waste fuel.
- Two 55-gallon drums labeled pending analysis.
- (17) 55-gallon drums of used oil waste.
- (24) 55-gallon drums of non-hazardous, non-regulated waste.

All containers were properly labeled as required.

Spill kits are located throughout the facility and in every truck. Fire extinguishers and showers were also present on site and appeared to be in working order. 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.

RECORDS

Records reviewed during the inspection were as follows:

- Oil transport records included the required information.
- Delivery and Acceptance Records were available for review and appeared consistent.
- Daily inspection logs: The facility performs daily inspection logs on the intake of waste located within the Treatment Warehouse Building.
- Hazardous waste training is performed annually in house on Florida's used oil management requirements and elements such as HAZWOPER and confined space entry were also documented
- The facility submitted their Annual Report on March 3, 2022 and their liability insurance was up to date.

PHOTO ATTACHMENTS:

Roll Off Storage



Treatment Warehouse Building



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Hazardous Waste Container



Aboveground Used Oil Storage Tank



Non-RCRA Regulated Waste Containers



Conclusion:

At the time of the inspection, Universal Environmental Solutions appeared to be operating in compliance with state and federal regulations for very small quantity generators of hazardous waste and transporters of used oil and hazardous waste.

Aboveground Storage Tanks



Aboveground Used Oil Storage Tanks



Non-RCRA Regulated Waste Containers



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2.0: VSQG 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.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)	✓		

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6.0: Transporters 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.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

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6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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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

Sarah M Green

Principal Investigator Name**Principal Investigator Signature**

Inspector

Principal Investigator Title

DEP

Organization

03/22/2022

Date

Gina Laddick

Inspector Name

Environmental Specialist 1

Inspector Title

DEP

Organization

John Downer

Representative Name

EHS Representative

Representative TitleUniversal Environmental
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.

Chad Josselyn

Representative Name

Plant Manager

Representative TitleUniversal Environmental
Solutions LLC**Organization**

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Ed Kinley

Representative Name

President

Representative TitleUniversal Environmental
Solutions LLC**Organization**

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Report Approvers:

Approver: Shannon Lenhart

Inspection Approval Date: 03/22/2022