



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

FACILITY INFORMATION:

Facility Name: Universal Environmental Services LLC
On-Site Inspection Start Date: 10/14/2021 **On-Site Inspection End Date:** 10/14/2021
ME ID#: 128239 **EPA ID#:** FLR000226019
Facility Street Address: 2612B Edison Ave, Fort Myers, Florida 33916-5306
Contact Mailing Address: 411 Dividend Dr, Peachtree City, Georgia 30269-1940
County Name: Lee **Contact Phone:** Data is missing from FIESTA

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Karen R. Bayly, Inspector
Other Participants: Lane Bryant, Operations Manager

LATITUDE / LONGITUDE: Lat 26° 37' 58.6953" / Long 81° 51' 33.9817"

NAIC: 423930 - Recyclable Material Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

A compliance evaluation inspection was conducted by Florida Department of Environmental Protection (FDEP) hazardous waste staff at Universal Environmental Services (UES/facility) on October 14, 2021 to verify the facility's compliance status with state and federal used oil rules and regulations. The following is a summary of my observations.

This facility was previously inspected by FDEP hazardous waste staff on 03-21-2019 and was not in compliance at that time. One violation was cited for failing to store used oil containers on an oil-impervious surface. The violation was corrected and the case was closed without formal enforcement.

This facility is currently registered with FDEP as a used oil filter transporter and used oil filter transfer facility. The registration expires on 06-30-2022. According to the previous inspection report, UES has been operating at this location since 03-15-2018. The UES corporate office is located at 411 Dividend Drive, Peachtree City, Georgia. Lee County Property Appraiser records identify Edison Oil Company (EOC) as the property owner of 2612 Edison Avenue. UES leases a portion of the facility from EOC.

The facility is unmanned. Prior to the inspection, Michael Schorr, UES Director, Governmental and Regulatory Affairs, was contacted regarding the inspection. Mr. Schorr granted permission to conduct the inspection and agreed to provide all requested documentation electronically. Upon arriving at the facility, the purpose of the inspection was reviewed with Lane Bryant, UES Florida Operations Manager. Mr. Bryant provided access and was present throughout the inspection.

Process Description:

UES leases one warehouse unit to store containers including empty used oil filter carts, full used oil filter carts and 55-gallon drums containing spill pads/absorbents and contaminated soil/oily dry; and leases a second unit as office space. Mr. Bryant indicated the facility utilizes one driver and one box truck to collect containers of

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used oil filters from generators, Monday - Friday. The driver and box truck were not present during the inspection.

According to Mr. Bryant, the box truck is equipped with emergency response and spill control equipment, contingency plan, an oil-impervious liner and FDEP used oil filter transporter registration. Drivers complete an equipment checklist on their phones every morning ensuring the truck is equipped with proper equipment. A photo of the truck was provided by Mr. Schorr following the inspection (see photo). The box truck is parked at the facility when not in use. The facility is surrounded by a chain-link fence and two access gates. The gate and fence appeared to be in good condition. The warehouse building is kept locked when no one is at the facility.

Used oil filter carts are picked up from generators and off-loaded daily inside the warehouse unit. The carts are maintained on visqueen (see photo). When approximately 40 carts are accumulated, the driver loads them onto the box truck and are currently being transported to the UES facility in Ocala (FLR000012906). The UES facility in Ocala is registered as a used oil filter transporter and transfer facility with FDEP. The carts are either off-loaded into a warehouse or directly onto a 53-foot trailer and transported to the UES facility in Peachtree, Georgia where they are crushed into blocks. Any used oil is extracted and re-refined. The blocks are transported to either U.S. Foundry & Manufacturing Corp (FLD004128336) in Miami or to one of several scrap metal dealers in Georgia. It was discussed that UES previously transported used oil filters directly from the UES Fort Myers facility to U.S. Foundry. Mr. Bryant indicated that U.S. Foundry has stopped accepting used oil filters due to an oxygen shortage. U.S. Foundry is registered as a used oil filter processor and end user with FDEP.

At the time of the inspection, there were approximately eighteen used oil filter carts and two 55-gallon drums of used oil filters stored inside the warehouse in addition to six 55-gallon drums of spill pads/absorbent and eleven 55-gallon drums of contaminated soil/oil dry. All the drums/carts were closed, labeled and in good condition. According to Mr. Schorr, non-filter material is transported along with used oil filters and processed at the UES Peachtree facility to extract any used oil and disposed as solid waste.

Records reviewed included annual registration, driver training records for 2021, contingency plan, shipping documents and logs for 2021. Review of the records noted UES is not consistently documenting the generator and/or destination facility EPA identification numbers on shipping papers and transfer papers. Immediately following the inspection, Mr. Schorr provided updated shipping documents that include EPA identification numbers. It was noted that the contingency plan should be updated to reflect Lane Bryant has replaced Kent Rittscher as UES primary contact for Florida. Immediately following the inspection, a revised contingency plan dated October 2021 was provided reflecting the update.

PHOTO ATTACHMENTS:

used oil filter carts on visqueen



box truck



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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 | | | ✓ |

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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

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|--|---|---------------------------------------|
| Karen R. Bayly <hr/> Principal Investigator Name  <hr/> Principal Investigator Signature | Inspector <hr/> Principal Investigator Title DEP <hr/> Organization | <hr/> 12/21/2021 <hr/> Date |
| Lane Bryant <hr/> Representative Name | Operations Manager <hr/> Representative Title UES <hr/> 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.

Report Approvers:

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| Approver: Karen R. Bayly <hr/> | Inspection Approval Date: 12/21/2021 <hr/> |
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