

FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE 3319 MAGUIRE BLVD., SUITE 232 ORLANDO, FLORIDA 32803 Ron DeSantis Governor

Jeanette Nuñez Lt. Governor

Noah Valenstein Secretary

February 10, 2020

Michael Schorr, EH&S Manager Universal Environmental Services LLC 509 French Ave Sanford, Florida 32771 Mschorr@universalenviro.com

Re: Universal Environmental Services LLC

HW Facility ID #FLR000050369

Seminole County

Dear Mr. Schorr:

Department personnel conducted an inspection of the above-referenced facility on January 7, 2020. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Miranda Rothenberger at 407-897-4301 or via e-mail at Miranda.Rothenberger@FloridaDEP.gov.

Sincerely,

Daniel K. Hall, Manager

Central District

Florida Department of Environmental Protection

end KThel

Enclosure: January 7, 2020 Inspection Report

cc: Karen Violet, UES, <u>kviolet@universalenviro.com</u> Miranda Rothenberger and John White, FDEP



Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Universal Environmental Services LLC

On-Site Inspection Start Date: 01/07/2020 On-Site Inspection End Date: 01/07/2020

ME ID#: 42065 **EPA ID#**: FLR000050369

Facility Street Address: 509 S French Ave, Sanford, Florida 32771-1875 **Contact Mailing Address:** 509 S French Avenue, Sanford, Florida 32771

County Name: Seminole Contact Phone: Data is missing from FIESTA

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler Used Oil: On-Spec, Oil Filters, Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Miranda Rothenberger, Inspector

Other Participants: John White, Inspector; Karen Violet, Manager

LATITUDE / LONGITUDE: Lat 28° 48' 27.0915" / Long 81° 16' 22.215"

NAIC: 425120 - Wholesale Trade Agents and Brokers

TYPE OF OWNERSHIP: Private

Introduction:

On January 7, 2020, Miranda Rothenberger and John White, Florida Department of Environmental Protection, inspected Universal Environmental Services (UES), represented by Karen Violet, for compliance with state and federal regulations. This facility operated as Fuels Unlimited Inc at this site since 2005, UES assumed operations in December of 2018. The facility's registration as a used oil transporter, used oil transfer facility, used oil marketer, used oil filter transporter, used oil filter transfer facility, and used oil filter processor was submitted on August 7, 2019 and expires on July 1, 2020.

UES notified the Department of its hazardous waste activities as a used oil handler and as a hazardous waste non-handler in a notification received on September 5, 2019 and was issued EPA identification number FLD000050369. Fuels Unlimited, Inc. was issued used oil processor permit #266845-003-HO on September 29, 2017, which expires on March 26, 2022. The permit was transferred to UES on September 12, 2019.

Inspection History (Past 5 Years)

Fuels Unlimited was last inspected on November 16, 2017 and was in compliance at that time.

Fuels Unlimited was inspected on June 9, 2016 and was in compliance at that time.

Process Description:

UES is a used oil broker operating on 0.39 acres of land. Used oil is stored in above ground storage tanks on site. Used oil is either picked up at generator sites by a tanker truck owned and operated by UES, or it is brought to the site by a tanker truck operated by a vendor.

UES does not perform any used oil processing on-site. The facility consists of an office, eight above ground

Universal Environmental Services LLC Inspection Report

Inspection Date: 01/07/2020

tanks, an equipment shed, a spill control shed, and a used oil transfer area. Six tanks are used for storage of used oil and have a combined storage capacity of 112,000 gallons. One tank has a storage capacity of 5,000 gallons and is used for storage of oily water. One tank has a storage capacity of 5,000 gallons and is used for storage of used antifreeze. Petroleum contact water (PCW) is not managed on site.

Used oil is off-loaded from trucks in a curbed area. Any releases during off-loading are contained in a secondary containment area and will be pumped into a 55-gallon drum. Used oil filters removed from trucks are placed in 55-gallon drums. Used absorbents are placed in a labeled 55-gallon drum.

Used oil picked up by UES drivers is field tested for halogen content prior to transport. A halogen sniffer is used to determine if the halogen content is greater than 1,000 ppm, the results "pass" or "fail" are recorded on the driver's shipping paper. If the sniffer registers a positive result, the oil is tested using a Dexsil Halogen test kit. The result of the Dexsil test will be recorded on the driver's shipping paper. Drop tickets are maintained that show each used oil load delivered by drivers. The documents include the date and total gallons received. Upon receipt at the facility, used oil is off-loaded into one of several used oil tanks. The volume of oil moved into, and out of, the oil storage tanks is measured and tracked in a log. Once full, each used oil tank is locked out and no additional oil is added. A sample of the oil is taken and split into two containers. One sample is shipped to the receiving facility for analysis prior to shipment of the used oil off-site. The second sample is retained in a flammables cabinet on-site in case additional questions arise.

All tanks within the tank farm are provided with secondary containment in the form of a concrete containment structure. The secondary containment area was clean, sealed, and appeared to be in good condition.

Used oil filters are stored within a storage container located on the property. Used oil filters are shipped to a foundry for reclamation and reuse of metals. Several drums of used oil filters were present at the time of the inspection.

The certificate of liability insurance for a used oil handler was received by the Department on August 30, 2019. No issues were noted.

UES is not currently sending oil to fuel burners, it is transported to their sister facility in St. George, South Carolina.

Shipping papers for used oil received were reviewed. The facility is documenting EPA identification numbers, where available, and marking a check box noting halogen content has been tested.

Conclusion:

Universal Environmental Services was inspected for compliance with its used oil processor permit and state and federal used oil transporter regulations and was found to be in compliance at the time of this inspection.

Universal Environmental Services LLC Inspection Report

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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
ſ	1.1	Has the facility notified with correct status? 262.18(a)	1		
Ī	1.2	Has the facility notified of change of status? 62-730.150(2)(b)			1
Ī	1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			1

Universal Environmental Services LLC Inspection Report

Inspection Date: 01/07/2020

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

Miranda Rothenberger		Inspector				
Principal Inv	estigator Name	Principal Investigator Title	Principal Investigator Title			
Principal Investigator Signature		DEP Organization	02/07/2020 Date			
		Organization				
John White		Inspector				
Inspector Name		Inspector Title				
		FDEP				
		Organization				
Karen Violet		Manager				
Representative Name		Representative Title				
		Universal Environmental				
		Services				
		Organization				
	nitting to the accuracy of any	Representative only acknowledges receipt of this of the items identified by the Department as "Po				
Report Appro	overs:					
Approver:	Daniel K. Hall	Inspection Approval Date:	02/07/2020			