



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

FACILITY INFORMATION:

Facility Name: Universal Environmental Services LLC

On-Site Inspection Start Date: 09/07/2023

On-Site Inspection End Date: 09/07/2023

ME ID#: 127125

EPA ID#: FLR000225029

Facility Street Address: 6940B Mission Ln, Fort Myers, Florida 33916-4862

Contact Mailing Address: 411 Dividend Dr, Peachtree City, Georgia 30269-1940

County Name: Lee

Contact Phone: (678) 544-2915

NOTIFIED AS:

Non-Handler, Used Oil

WASTE ACTIVITIES:

Generator: Non-Handler

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for Used Oil Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pamela S Coffin, Inspector

Other Participants: Genevieve Grah, Environmental Specialist I, Alex Castaneda, Operations Manager,
Gene Eakins, Vice President, Don Hendshaw, Lubricant Sales

LATITUDE / LONGITUDE: Lat 26° 38' 33.2993" / Long 81° 49' 58.0226"

NAIC: 423930 - Recyclable Material Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Universal Environmental Services LLC (hereinafter, "UES" or "facility"), located at 6940B Mission Lane, Fort Myers, Lee County, Florida was inspected by the Florida Department of Environmental Protection (DEP or Department) on September 7, 2023 (09/07/2023), to determine the facility's compliance with the state and federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, 40 CFR Part 273, and 40 CFR 279, adopted and incorporated by reference in Chapters 62-710 and 62-730, Florida Administrative Code (F.A.C.).

All records associated with UES are maintained by Michael Schorr, UES Director of Governmental and Regulatory Affairs, in Peachtree City, Georgia. Prior to the inspection, Mr. Schorr and Alex Castaneda, UES Operations Manager, were contacted regarding this inspection. Upon arrival at the facility the inspectors were met and escorted around the facility by Mr. Castaneda. Walter (Gene) Eakins Jr., Vice President of EOC and Don Hendshaw, Lubricant Sales of EOC, were also present at the conclusion of the inspection.

Notification History:

The facility initially notified and registered with the Department as a used oil and used oil filter transporter and transfer facility in November 2017. The facility was assigned the EPA Identification (EPA ID) Number FLR000225029. The facility's most recent registration was submitted in February 2023. As part of their registration, UES submitted an annual report for January – December 2022 which reflects 803,794 gallons of used oil was collected at the facility, of which 781,210 gallons was transported from the facility out of state, and 17,373 gallons was treated in-state at a wastewater treatment unit. The current registration expires 06/30/2024.

Inspection History:

The facility was previously inspected by the Department on 02/13/2018 and 10/14/2021. The 2018 inspection

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resulted in enforcement actions for failure to register with the Department as a used oil transporter and transfer facility, and for failure to provide adequate secondary containment for used oil storage.

Personal Protective Equipment (PPE) was required to enter the facility. Inspectors were equipped with steel-toed boots.

Process Description:

Lee County Property Appraiser records reflect Edison Oil Company Inc. (EOC) owns the approximate 85,000 sf property. EOC operates a bulk oil storage facility, which includes fourteen (14) aboveground storage tanks (ASTs) registered with the Department (Facility ID: 8519437). The tank system was last inspected by Lee County Division of Natural Resources on 04/07/2021 and determined to be in compliance. EOC maintains financial assurance for the tank system and was verified to be current at the time of the inspection. EOC maintains a spill prevention, control and countermeasures (SPCC) plan for the site. The facility is surrounded by a chain-link fence secured with an access gate. The gate and fence appeared to be in good condition.

UES leases two (2) 15,000-gallon horizontal-mounted, single-walled aboveground storage tanks (#1&2) from EOC and operates a used oil and used oil filter transfer facility at this location (photo 1). According to DEP's database, Universal Environmental Services' registration for used oil handler activities at this address was renewed on 02/28/2023 and expires on 06/30/2024.

The tank system is situated within a concrete block secondary containment structure. Gene Eakins, Vice President of Edison Oil Company, confirmed that the secondary containment structure is sealed and painted every 3-5 years, and most recently done in June 2022. Rainwater that collects in the containment structure is discharged via a drain sump located in the southwest corner of the containment structure. The drain port/valve was verified closed at the time of the inspection. According to Mr. Eakins, the containment is drained regularly. Any accumulated water is first visually inspected for sheen or odor and absorbent material used if necessary to prevent oily discharge prior to draining.

The tanks and piping are labeled used oil, Universal Environmental Services, and numbered. Each tank is equipped with a gauge to visually determine the tank volume. The tanks have designated fill ports and drain ports. Directly beneath the ports and within the containment structure is a grated containment tray and metal cover to collect any incidental drips or spills during off/on-loading (photo 2).

Two (2) 55-gallon spill kits are maintained outside the south wall of the containment structure. Inspectors observed three (3) 55-gallon drums labeled "Non-Hazardous Materials Only – Contaminated Soil/Oil Dry, Spill Pads/Used Absorbents" (photo 3). Two of the three drums were full. Universal Environmental Services LLC (UES) maintains and disposes of this waste.

UES transports used oil from generator sites to this location where it is stored in storage tanks #1 and #2 until transported to the UES re-refinery facility in Peachtree City, Georgia (EPAID: GAR000020131) for processing.

According to Mr. Castaneda, this facility utilizes three trucks and three drivers for transporting used oil, oily water, and antifreeze. No used oil filters are transported or stored at this facility. Any used oil filters picked up by UES are transferred to the UES's transfer facility located at 2612B Edison Avenue, Fort Myers, FL for storage and then transport to the UES Georgia or Alabama processing facilities.

Universal Environmental Services uses real-time tracking and logistics technology to schedule, route, and track product movement. The driver maintains a daily route truck load report which documents the manifest number, date, customer name, address, and EPA ID (if available), destination facility, transporter ID, gallons of used oil, used antifreeze and oily water picked up, halogen results, and electronic signatures of generator and transporter.

At the time of the inspection, there were no UES trucks or drivers at the facility. According to Mr. Castaneda, the transporter registration form and EPA Identification number are maintained in the trucks, as well as a

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contingency plan, and emergency response and spill equipment. Drivers complete an equipment checklist on their phones or devices every morning ensuring the truck is equipped with proper equipment.

Halogen leak detectors (sniffers) are used at every generator location to test the halogen content in used oil and oily water prior to collection. If the sniffer detects the presence of halogenated compounds, a Dexsil Chlor-D-Tect test is conducted. Mr. Castaneda noted that the drivers check the sniffer each morning with a diesel fuel sample to make sure it is working properly.

Upon returning at the end of the day, the driver tests the used oil before off-loading into the designated storage tank. An inbound receiving log is maintained documenting the date, truck number, gallons off-loaded, halogen results, tank # loaded and the driver initials. After the truck is off-loaded, it is parked at the 2612B Edison Avenue, Fort Myers location.

An outbound transfer report is also maintained documenting the date and volume of used oil and oily water removed from this facility and transported to the UES Georgia facility. Records reflect approximately 5,000-gallons of used oil is transported to Georgia 2-3 times a week where it is re-refined.

Documentation of employee training was provided for review [62-710.600(2)(b), F.A.C.]. The facility was able to provide evidence of required financial assurance in the form of appropriate vehicle insurance by submitting the DEP Form 62-710.901(5)(a) Certificate of Liability Insurance for Hazardous Waste Transporters and Used Oil Transporters along with their registration renewal to the DEP in Tallahassee [62-710.600(2)(e), F.A.C.].

PHOTO ATTACHMENTS:

Photo 1 Used oil tanks

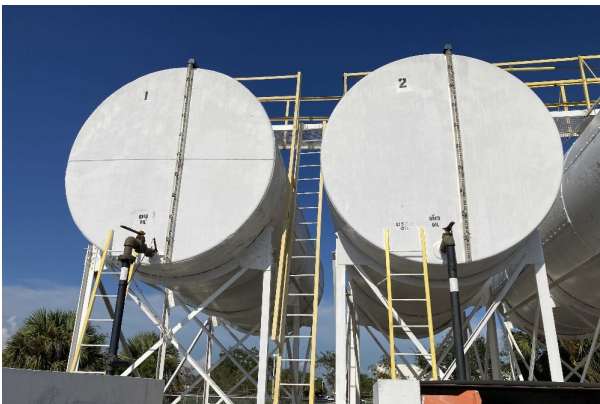


Photo 2 fill drain ports



Photo 3 Sorbents drum storage



Conclusion:

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The Universal Environmental Services LLC facility was inspected as a used oil and used oil filter transporter and transfer facility and was found to be in compliance with state and federal hazardous waste and used oil management regulations.

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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

Pamela S Coffin
Principal Investigator Name

Inspector
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

09/27/2023
Date

Genevieve Grah
Inspector Name

Environmental Specialist I
Inspector Title

DEP
Organization

Alex Castaneda
Representative Name

Operations Manager
Representative Title

Universal Environmental Services
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.

Gene Eakins
Representative Name

Vice President
Representative Title

Edison Oil Company
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.

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Don Hendshaw
Representative Name

Lubricant Sales
Representative Title

Edison Oil Company
Organization

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Report Approvers:

Approver: Pamela S Coffin

Inspection Approval Date: 09/27/2023