

From: [Mike Schorr](#)
To: [Knight, Jade](#)
Cc: [Jose Castaneda](#); [Polycart, Johanna](#); [Taylor, Kaitlyn A](#)
Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389
Date: Wednesday, October 18, 2023 7:42:05 PM
Attachments: [IMG_1576.heic](#)
[UES Signed State of FL - Hazardous Waster Cert\(1.1.2022\).pdf](#)

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Jade,

Attached you will find the following. Thank you for the extension for the response.

- To clarify, is any waste stored on-site or does it act as a pitstop for transporters to pick up new materials to carry out operations?
 - This is primarily a pitstop for new drums / containers to be placed at new customers. With that said, it is possible that drums / containers containing used oil filters may be stored within the warehouse. A majority of the used oil filters that we collect are transported on a "WaBo" truck. This type of truck is similar to a garbage truck / recycling truck. The WaBo performs "milk runs", collecting used oil filters from generators across the region and the WaBo ultimately delivers those filters to a FDEP registered used oil filter transfer facility or processor. There are times where a UES box truck may bring containers containing used oil filters to the 3469 NW 19th St Bldg. 7 Bay #16 Lauderdale Lakes, FL 33311 location. The FDEP Filter Transporter, Filter Transfer Facility registration is EPA ID# FLR000227389.
- Please provide photos of the outside of the warehouse, general inside picture, spill kits, and if waste is stored on-site please provide photos of that area.
 - A recent photo is attached.
- Please provide your used oil filter collections acceptance onto this site location and delivery documentation from this site.
 - The used oil filter collections from our Ft. Lauderdale dispatch area include the WaBo truck milk runs that do not touch this facility. I would like to discuss this further as to not confuse the limited volume that may appear to have been transferred through the 3469 NW 19th St Bldg. 7 Bay #16 Lauderdale Lakes, FL 33311 location.
- Please provide test analysis or documentation of used oil filters, which indicate its halogen content.
 - Used Oil Filters are collected from commercial crankcase used oil generators. These used oil filters are collected after the generator applies a generator knowledge certification. The resulting used oil that is generated from the used filter processing operation is tested for total halogens prior to being further managed.
- Please provide training documentation, DOT certifications, 40-hour HAZWOPER, etc.
 - This is a unmanned warehouse location. There are no drivers dispatched out of the 3469 NW 19th St Bldg. 7 Bay #16 Lauderdale Lakes, FL 33311 location.

- Please provide documentation a valid liability insurance per 62-710.600(2)(e) F.A.C.
 - Please see attached.

Can we arrange a call tomorrow to review and discuss these responses? Specifically the collections records. We can provide those, however they do not apply to this specific location and EPA ID #.

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: 678-544-2915 | MSchorr@universalenviro.com

<http://www.universalenvironmentalservices.com>

AVISTA OIL USA | REDEFINING RE-REFINING



From: Mike Schorr

Sent: Tuesday, October 17, 2023 2:16 PM

To: Knight, Jade <Jade.Knight@FloridaDEP.gov>

Cc: Jose Castaneda <jcastaneda@universalenviro.com>; Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>

Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

Thank you.

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: 678-544-2915 | MSchorr@universalenviro.com

<http://www.universalenvironmentalservices.com>

AVISTA OIL USA | REDEFINING RE-REFINING



From: Knight, Jade <Jade.Knight@FloridaDEP.gov>

Sent: Tuesday, October 17, 2023 2:05 PM

To: Mike Schorr <mschorr@universalenviro.com>

Cc: Jose Castaneda <jcastaneda@universalenviro.com>; Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>

Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

Good Afternoon,

Yes, COB tomorrow is accepted. Have safe travels!

Thank you,



Jade Knight

Environmental Specialist I

Florida Department of Environmental Protection

Compliance Assurance Program

Southeast District – West Palm Beach

Jade.Knight@FloridaDEP.gov

Office: 561-681-6623

From: Mike Schorr <mschorr@universalenviro.com>

Sent: Tuesday, October 17, 2023 2:02 PM

To: Knight, Jade <Jade.Knight@FloridaDEP.gov>

Cc: Jose Castaneda <jcastaneda@universalenviro.com>; Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>

Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

EXTERNAL MESSAGE

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Jade,

Good afternoon. I am traveling this afternoon. Can I forward this information to you by COB tomorrow please?

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: 678-544-2915 | MSchorr@universalenviro.com

<http://www.universaleenvironmentalservices.com>

AVISTA OIL USA | REDEFINING RE-REFINING



From: Knight, Jade <Jade.Knight@FloridaDEP.gov>

Sent: Tuesday, October 17, 2023 1:35 PM

To: Mike Schorr <mschorr@universalenviro.com>

Cc: Jose Castaneda <jcastaneda@universalenviro.com>; Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>
Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

Good Afternoon Mr. Castaneda,

Thank you for your time and attention to this case. As per our phone call the requested information / photos / documentations can be submitted by the **end of today** or by tomorrow **[10/18/2023]**. Please feel free to reach out with any questions or concerns.

Thank you,



Jade Knight
Environmental Specialist II
Florida Department of Environmental Protection
Compliance Assurance Program
Southeast District – West Palm Beach
Jade.Knight@FloridaDEP.gov
Office: 561-681-6623

From: Knight, Jade
Sent: Monday, October 9, 2023 3:12 PM
To: Mike Schorr <mschorr@universalenviro.com>
Cc: Jose Castaneda <jcastaneda@universalenviro.com>; Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>
Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

Good Afternoon Mr. Schorr,

Thank you for your patience while I review the responses. The Department does have a few additional requests/questions:

- To clarify, is any waste stored on-site or does it act as a pitstop for transporters to pick up new materials to carry out operations?
- Please provide **photos** of the outside of the warehouse, general inside picture, spill kits, and if waste is stored on-site please provide photos of that area.
- Yes, please provide your **used oil filter collections acceptance** onto this site location and **delivery** documentation from this site.
- Please provide **test analysis** or documentation of used oil filters, which indicate its **halogen** content.
- Please provide **training documentation**, DOT certifications, 40-hour HAZWOPER, etc.
- Please provide **documentation** a valid **liability insurance** per 62-710.600(2) (e) F.A.C.

Please submit the requested information by Friday, **10/13/2023**. If you have any additional questions or concerns, please feel free to contact me through the email

below.

Sincerely,



Jade Knight

Environmental Specialist II

Florida Department of Environmental Protection

Compliance Assurance Program

Southeast District – West Palm Beach

Jade.Knight@FloridaDEP.gov

Office: 561-681-6623

From: Mike Schorr <mschorr@universalenviro.com>

Sent: Monday, September 25, 2023 3:23 PM

To: Knight, Jade <Jade.Knight@FloridaDEP.gov>; Jose Castaneda <jcastaneda@universalenviro.com>

Cc: Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>

Subject: RE: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

EXTERNAL MESSAGE

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Jade,

Good afternoon. My apologies for the delay in responding to your questions. Please see my answers below. Some of your questions do not pertain to the 3469 NW 19th St, Lauderdale Lakes, FL 33311, EPA ID# FLR000227389. This location is an unmanned warehouse and is registered as a used oil filter transfer facility.

- EPA ID numbers are site specific, so please elaborate on the processes that occur on the facility site's address 3469 NW 19th St, Lauderdale Lakes, FL 33311.
 - This location is a used oil filter transfer facility. Used Oil filters are transferred out of state to one of our two used filter processing facilities (Alabama or Georgia). Used filters are crushed and the processed scrap steel is marketed. Recovered used oil from these streams is managed at that Universal Environmental Services location.
- Please include site photos of each process.
 - The 3469 NW 19th St, Lauderdale Lakes, FL 33311 is a small warehouse. A majority of the used filters collected are transported directly to another registered facility for bulking.
- Are your other facility's also registered with the FDEP?
 - Yes. Universal Environmental Services has 7 facilities registered in Florida in addition to an out of state used oil transporter registration.
- Acceptance and Delivery Records for used oil transported for the following months: January 2023, March 2023, October 2022, December 2022, June 2021, and August 2021. Rule 62-710.510(1)(d-g), and 40 CFR 279.46(b)(1-4)
 - Are you looking for used oil filter collection records, or used oil collection records? The used oil collection records would fall under our FLR000225367 location. Will those

records be requested under a separate inspection?

- Halogen Testing records for transported used oil, if the information is on the shipping records please let me know. 40 CFR 279.44(b)(1-2).
 - The halogen testing records are maintained on the shipping records.
- What method do you use for testing (example sniffer test, dextsil test)
 - Sniffers are used in the field for halogen screening prior to collection. Dextsil kits are used at the FLR000225367 facility prior to offloading.
- Training certificate for individuals that handle used oil (DOT and Used Oil Management). Rule 62-710.600(2)(c)
- Copy of Used Oil Transporter Annual Report sent to the Department by March 1. Rule 62-710.510(5).
 - When submitting the annual reports for a used oil filter only location through the business portal, volume records are not requested. See the attached registration verification.

Also to help with writing the inspection report, please provide these basic information about the facility by the date 09/15/2023:

- What is the approximate square footage of your facility?
- ~5,000 sq ft.
- When was this facility opened at this location?
 - July 2018.
- What are the number of employees working at this location in total?
 - This facility is unmanned.
- Is this facility connected to city/well water and sewer?
- What do you do in any case of spill?
 - The facility maintains spill kits in the event of a spill or leak.
- Do you also transport Used Oil Filters, and Petroleum Contact Water?
 - This facility is only a warehouse for used filter storage.

Please let me know if you would like to discuss further.

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: 678-544-2915 | MSchorr@universalenviro.com

<http://www.universalenviroenvironmentalservices.com>

AVISTA OIL USA | REDEFINING RE-REFINING



From: Knight, Jade <Jade.Knight@FloridaDEP.gov>

Sent: Tuesday, September 12, 2023 2:35 PM

To: Jose Castaneda <jcastaneda@universalenviro.com>

Cc: Polycart, Johanna <Johanna.Polycart@FloridaDEP.gov>; Taylor, Kaitlyn A <Kaitlyn.A.Taylor@FloridaDEP.gov>; Mike Schorr <mschorr@universalenviro.com>

Subject: [External] Exit Interview 09/11/2023 - Universal Environmental Services FLR000227389

Good Afternoon,

This email serves as a follow up to the phone conversation conducted during a routine compliance evaluation inspection conducted on September 11, 2023 (09/11/2023) by the Florida Department of Environmental Protection (FDEP). We appreciate your team for taking the time to speak with us regarding the facility Universal Environmental Services LLC [FLR000227389], located at 3469 NW 19th St, Lauderdale Lakes, FL 33311. As per the phone conversation the Department has some requests and additional questions:

- EPA ID numbers are site specific, so please **elaborate on the processes** that occur on the facility site's address 3469 NW 19th St, Lauderdale Lakes, FL 33311.
 - Please include site photos of each process.
 - Are your other facility's also registered with the FDEP?
- **Acceptance and Delivery Records** for used oil transported for the following months: January 2023, March 2023, October 2022, December 2022, June 2021, and August 2021. **Rule 62-710.510(1)(d-g), and 40 CFR 279.46(b)(1-4)**
- **Halogen Testing records** for transported used oil, if the information is on the shipping records please let me know. **40 CFR 279.44(b)(1-2)**
 - What method do you use for **testing** (example sniffer test, dexsil test)
- **Training certificate** for individuals that handle used oil (DOT and Used Oil Management). **Rule 62-710.600(2)(c)**
- Copy of **Used Oil Transporter Annual Report** sent to the Department by March 1. **Rule 62-710.510(5)**

Also to help with writing the inspection report, please provide these basic information about the facility by the date **09/15/2023**:

- What is the approximate square footage of your facility?
- When was this facility opened at this location?
- What are the number of employees working at this location in total?
- Is this facility connected to city/well water and sewer?
- What do you do in any case of spill?
- Do you also transport Used Oil Filters, and Petroleum Contact Water?

Please submit the requested information by Friday, **09/22/2023**. If you have any additional questions or concerns, please feel free to contact me through the email below.

Sincerely,



Jade Knight

Environmental Specialist II

Florida Department of Environmental Protection

Compliance Assurance Program

Southeast District – West Palm Beach

Jade.Knight@FloridaDEP.gov

Office: 561-681-6623
