

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:Facility Name: Universal Environmental Services LLCOn-Site Inspection Start Date: 09/11/2023ME ID#: 129828Construction Construction Constructio

On-Site Inspection End Date: 09/11/2023 EPA ID#: FLR000227389

Facility Street Address: 3469 NW 19th St, Lauderdale Lakes, Florida 33311-4224Contact Mailing Address: 411 Dividend Dr, Peachtree City, Georgia 30269-1940County Name: BrowardContact Phone: Data is missing from FIESTA

NOTIFIED AS: Non-Handler, Used Oil

WASTE ACTIVITIES: Generator: Non-Handler Used Oil: Oil Filters

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jade Knight, Inspector

Other Participants: Kaitlyn Taylor, Environmental Specialist III, Michael Schorr, Director of Governmental & Regulations

LATITUDE / LONGITUDE: Lat 26° 9' 5.6304" / Long 80° 9' 36.7812" NAIC: 423930 - Recyclable Material Merchant Wholesalers TYPE OF OWNERSHIP: Private

Introduction:

On September 11, 2023 (09/11/223), Jade Knight with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Inspection at Universal Environmental Services (FLR000227389), located at 3469 NW 19th St, Lauderdale Lakes, FL 33311. Universal Environmental Services was inspected to determine the facility's compliance with the state and Federal used oil regulations described in Title 40, Code of Federal Regulations (CFR) Parts 279, adopted and incorporated by reference in Rule 62-710, Florida Administrative Code (F.A.C.). The inspector was accompanied by Kaitlyn Taylor, Environmental Specialist III from the FDEP.

Representatives were not present at the time of the inspection, so the inspector conducted the site visit while being on the phone with representative Mike Schorr, Director of Governmental Affairs. While at the site, the inspector presented their credentials and explained the purpose of the inspection over the phone.

Universal Environmental Services occupies 5,000 square footage and is not connected to public water or sewer. Universal Environmental Services has been operating at its current location since July 2018 and operates as an unmanned location.

Notification History:

Universal Environmental Services initially registered with the Department as a Used Oil Filter Transporter and Transfer Facility on 07/26/2018. The facility was assigned the EPA Identification (EPAID) Number FLR000227389. The facility most recently registration as a Used Oil Filter Transporter and Transfer Facility on 02/28/2023. The facility's used oil handler registration expires on 06/30/2024.

Inspection History:

The facility has not previously been inspected by the Department as a Used Oil Filter Transporter and Transfer

Facility.

Personal Protective Equipment (PPE) was not required to enter the facility. Department personnel were equipped with steel-toed boots.

Process Description:

Universal Environmental Services is a private company that operates as a used oil and used oil filter collectors and processors. Universal Environmental Services collects industrial or automotive used oil filters if they have recoverable metals. The used oil filters are crushed, and the scrap metal is marketed to recycle facilities. Most of the used oil filters collected are transported to another one of Universal Environmental Services registered facilities for bulking. The used oil and used oil filters then go to collection centers then to used oil processor sites. Facility advertises providing customers with 95-gallon rollaway carts and 275-gallon bins for various sized generators. At the FLR000227389 facility, it operates only as a Used Oil Filter Transporter and Transfer Facility.

Wastes are rarely at this facility (FLR000227389) and would only be used oil filters. This is primarily a pitstop for drivers to pick up new drums / containers to bring to new customers. Most of the used oil filters collected are transported on a "WaBo" truck (or UES Box Truck), which 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. At times the UES box truck may bring containers containing used oil filters to the facility (FLR000227389) until it is able to complete its delivery to their correct registered facility.

Records Review

Due to facility operating unmanned, records were not available on-site for review and are held on-site by their Universal Environmental Services LLC (FLR000225367) location. Compliance assistance was provided on-site and in the exit interview requesting Acceptance & Delivery manifests/records, Halogen content results, training logs, annual report, and certification of liability insurance.

Acceptance & Delivery Records:

As waste is not accepted onto this site, but just acts as a pit stop for drivers the acceptance and delivery records are not applicable to this site. All records are held at the site of actual delivery. Rarely trucks that make a pitstop overnight may carry drums of used oil filters, which may be stored inside the warehouse that night and taken to the used oil filter processing facility the following morning.

Halogen Content:

Facility uses sniffer tests for halogen screening prior to collecting waste from customers. Upon delivery of accepted waste, Dexsil kits are used at their FLR000225367 facility at offloading. All halogen content results are maintained on their shipping records.

Training:

Facility is unmanned, as it is just a pitstop and no drivers are dispatched out of this facility. Training records are not applicable to this facility.

Annual Reports:

The facility has submitted an Annual Report for Used Oil and Used Oil Filters activities for the year 2023 activities to the Department by March 1st per [62-710.510(5), FAC]. Annual reports and registered certification copies are managed and held on-site by their FLR000225367 facility.

Certification of Liability Insurance:

The facility could demonstrate liability insurance for all facilities with Navigator Specialty Insurance Company for \$1,000,000, policy number GA22NP30A9D0BIC, expiring 01/01/2023 per [62-710.600(2)(e), FAC]. As this

facility is only involved in used oil filter transportation it is not required to have a Certification of Liability Insurance. Compliance assistance was provided in the follow-up on 10/20/2023 to ensure that its other facilities have an updated Certification of Liability Insurance.

PHOTO ATTACHMENTS:



Conclusion:

Universal Environmental Services LLC was inspected as a Used Oil Filter Transporter and Transfer Facility and was found to be In Compliance.

An exit interview was sent on 09/12/2023 and provided a deadline of 09/22/2023 to submit requested documentation. On 09/25/2023, facility submitted responses to the exit interview. On 10/09/2023 a request for additional information and documentation was sent and was provided the deadline of 10/13/2023. On 10/18 /2023 the facility submitted all documentation and answers to The Department, confirming that the facility was In Compliance.

An In Compliance Letter will be sent to the facility.

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)	1		
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)			1
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) Exemption Type - Tolling Agreement Exemption Type - VSQG Bill-of-Lading	1		
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)	1		
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)	1		
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)	1		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	1		
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)			1
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

Inspection Date: 09/11/2023

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)			1
6.18	initial rail transporter, does the rail transporter return a signed copy of the anifest to the non-rail transporter? 263.20(f)(1)(ii)			1
6.19	initial rail transporter, does the rail transporter forward at least three copies of me manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			1
6.20	initial rail transporter, does the rail transporter retain one copy of the manifest nd rail shipping paper? $263.20(f)(1)(iv)$			1
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 (2)			1
6.22	es the final rail transporter obtain the date of delivery and handwritten nature of the designated facility on the manifest or shipping paper? 263.20(f) (i)			1
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			1
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)			1
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)			1
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			1
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 recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			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) Name, address, and EPA identification number of the generator of the waste Quantity of waste accepted All DOT-required shipping information 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)			1
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)			1
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)			1
6.32	f 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			1

6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)		1
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)		~

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

Inspector		
Principal Investigator Title		
DEP Organization	10/23/2023 Date	
Environmental Spec	ialist III	
Inspector Title		
FDEP		
Organization		
Director of Gover	nmental &	
Regulations		
Representative Titl	e	
СНММ		
Organization		
	Principal Investigator Title DEP Organization Environmental Spec Inspector Title FDEP Organization Director of Gover Regulations Representative Title CHMM	

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:

Approver: Johanna Polycart

Inspection Approval Date:

10/23/2023