



# FLORIDA DEPARTMENT OF Environmental Protection

Central District Office  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

October 25, 2023

Ronald C. Patterson, Operations Manager  
Universal Environmental Services, LLC  
509 S. French Avenue  
Sanford, Florida 32771  
[cpatterson@universalenviro.com](mailto:cpatterson@universalenviro.com)

Re: Compliance Assistance Offer  
Universal Environmental Services, LLC  
HW FLR000050369  
Seminole County

Dear Mr. Patterson:

An inspection was conducted at your property on August 29, 2023. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically,

Potential non-compliance with the requirements of chapter 403, Florida Statutes, and chapter 62-710, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the items of concern noted and respond in writing within **30 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Michael Eckoff of the Central District Office at (407) 897-4308 or via e-mail at [michael.eckoff@floridadep.gov](mailto:michael.eckoff@floridadep.gov). We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Viviana Useche', with a stylized flourish at the end.

Viviana Useche , Environmental Manager  
Central District  
Florida Department of Environmental Protection

Enclosures:    Inspection Report (with attachments)



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

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**FACILITY INFORMATION:**

**Facility Name:** Universal Environmental Services LLC

**On-Site Inspection Start Date:** 08/29/2023

**On-Site Inspection End Date:** 08/29/2023

**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:** (678) 544-2915

**NOTIFIED AS:**

Non-Handler, Used Oil

**WASTE ACTIVITIES:**

**Generator:** Non-Handler **TSD:** Operating Non-Commercial TSD **Used Oil:** On-Spec, Oil Filters, Processor

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Michael Eckoff, Inspector

Other Participants: Nicole Licata, Administration

**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 August 29, 2023, Michael Eckoff, Florida Department of Environmental Protection (FDEP or Department), accompanied by Nicole Licata, Universal Environmental Services, LLC (UES or Facility), inspected UES for compliance with permit number 266845-005-HO. The permit was issued 4/12/2022 and expires 3/26/2027.

The facility formerly operated under Fuels Unlimited, Inc. Universal Environmental Services, LLC took over operations in December of 2018.

The facility's registration as a used oil transporter, used oil transfer facility, used oil filter transporter, and used oil filter transfer facility expires on 6/30/2024.

**Inspection History (past five years)**

The facility was inspected by the Department in August of 2021 for compliance with its permit. No potential violations were noted at that time.

The facility was inspected by the Department in January of 2020 for compliance with its permit. No potential violations were noted 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 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

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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 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 flammable 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 appeared to have cracks and in need of new sealant.

NOTE: Calvin Patterson, Manager, stated the repairs and new sealant is in the plans for this year.

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.

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

Mr. Patterson joined the inspection.

#### Records

A copy of the used oil handler validated registration was posted in the office.

The annual report by used oil and used oil filter handlers was received by the Department on February 28, 2023.

The facility's financial assurance was deemed adequate on June 19, 2023.

A valid certificate of liability insurance was received by the Department on February 2, 2023. The current policy expires on January 1, 2024.

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. The shipping paper's do not include the type of used oil received [62-710.510(1)(d), Florida Administrative Code (F.A.C.)].

Oily water is picked up by Water Recovery, LLC, FLR000069062.

Used antifreeze is picked up by On Site Antifreeze Recycling, FLR000154807.

Used oil filters are taken to the UES Ocala facility.

The annual review of the contingency plan and inspections of emergency and safety equipment were not available [403.161(1)(b), Florida Statutes (F.S.)].

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**New Potential Violations and Areas of Concern:****Violations**

Type: Violation  
Rule: **403.161(1)(b)**  
Explanation: It shall be a violation of this chapter, and it shall be prohibited for any person: (b) To fail to obtain any permit required by this chapter or by rule or regulation, or to violate or fail to comply with any rule, regulation, order, permit, or certification adopted or issued by the department pursuant to its lawful authority.

Specifically, Universal Environmental Services, LLC failed to document the annual review of the contingency plan (permit condition Part II Subpart A number 4.e.) and inspections of emergency and safety equipment (permit condition Part II Subpart A number 5.d.).

Corrective Action: Universal Environmental Services, LLC is required to comply with the permit issued by the department.

Please provide documentation of the annual review of the contingency plan and inspections of emergency and safety equipment to the Department within 30 days from the date of your receipt of this report.

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Type: Violation  
Rule: **62-710.510(1)(d)**  
Explanation: Each registered person shall maintain records on DEP Form 62-710.901(2), "Used Oil and Used Oil Filter Record Keeping Form and Instructions," effective date 4-23-13, which is hereby adopted and incorporated by reference (<http://www.flrules.org/Gateway/reference.asp?No=Ref-02069>), or on substantially equivalent forms which contain at least the same information as the Department form. This form can be obtained on the internet at <https://floridadep.gov/waste/permitting-compliance-assistance/content/used-oil-forms> or by contacting the Permitting and Compliance Assistance Program, MS 4500, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. These records shall include the following information: (d) The type of used oil received, using the type code designation found in the form instructions.

Specifically, Universal Environmental Services, LLC failed to include the type of used oil on the shipping papers.

Corrective Action: Universal Environmental Services, LLC is required to maintain records on DEP Form 62-710.901(2), "Used Oil and Used Oil Filter Record Keeping Form and Instructions," effective date 4-23-13, which is hereby adopted and incorporated by reference (<http://www.flrules.org/Gateway/reference.asp?No=Ref-02069>), or on substantially equivalent forms which contain at least the same information as the Department form. This form can be obtained on the internet at <https://floridadep.gov/waste/permitting-compliance-assistance/content/used-oil-forms> or by contacting the Permitting and Compliance Assistance Program, MS 4500, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. These records shall include the type of used oil received, using the type code designation found in the form instructions.

Please provide documentation of the type of used oil included on the shipping papers to the Department within 30 days from the date of your receipt of this report.

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**Conclusion:**

Universal Environmental Services, LLC was inspected as a used oil processor and was not in compliance at that time.

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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

Michael Eckoff  
Principal Investigator Name

Inspector  
Principal Investigator Title

Michael Eckoff  
Principal Investigator Signature

DEP  
Organization

10/18/2023  
Date

Nicole Licata  
Representative Name

Administration  
Representative Title

Universal Environmental  
Services, LLC  
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:**

Approver: Viviana Useche

Inspection Approval Date: 10/25/2023