

Eckoff, Michael

From: Karen Violet <kviolet@universalenviro.com>
Sent: Wednesday, November 22, 2023 5:28 PM
To: Eckoff, Michael
Cc: Calvin Patterson; Mike Schorr
Subject: FW: [External] Universal Environmental Services, LLC - RCRA inspection
Attachments: Select - Customer Types.xlsx

EXTERNAL MESSAGE

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

Mr. Eckoff,

I sent an email with the reply letter from Ronald C Patterson to you for the Sanford inspection on August 29, 2023. I am forwarding the email with the information we received from Mike Schorr in reference to the reply letter.

Thank you,

Karen Violet
Universal Environmental Services
Sanford, Florida
407-302-3193
kviolet@universalenviro.com



From: Mike Schorr <mschorr@universalenviro.com>
Sent: Tuesday, November 21, 2023 3:31 PM
To: Karen Violet <kviolet@universalenviro.com>; Calvin Patterson <cpatterson@universalenviro.com>
Subject: FW: [External] Universal Environmental Services, LLC - RCRA inspection

Karen,
Below (highlighted) and attached is the discussion regarding Oil Type. This was sufficient for the Central District in the Ocala inspection.

Sincerely,

Michael Schorr, CHMM
Director, Governmental and Regulatory Affairs
T: 678-544-2915 | MSchorr@universalenviro.com
<http://www.universaleenvironmentalservices.com>



From: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Sent: Thursday, July 13, 2023 2:56 PM
To: Mike Schorr <mschorr@universalenviro.com>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

Mr. Schorr

The used oil type code information added to the customer type list is sufficient.

Thank you for working with us and resolving this issue.

Have a great day!!!



Wanda Robles
Environmental Specialist
Florida Department of Environmental Protection
Central District – Orlando
Wanda.Robles@FloridaDEP.gov
407.897.4126

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Friday, July 7, 2023 12:27 PM
To: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Wanda,

Good afternoon. I added a column to our Customer Type list and attached it for reference. Based on the customer type listed on our annual volume reports, I know when putting together the annual reports what is Automotive, Industrial or Mixed, and that is what is reported annually. It is not a case of UES not tracking this information.

If this needs to be on the manifest for each collection, could you give me an opportunity to talk to our systems developer and have an entry made to the manifests that is generated from the customer type designation that is in place. This should be a straightforward development that they can make but I will need to talk to them. It should not be different than the EPA ID# field that carries over to the manifest from the customer set up system.

For example, if we perform a service for a customer that is listed as a "New and Used Car customer type, type 1A" on our list, Customer type 1A is Automotive Oil, and that can be referenced somewhere on the manifest. I do not want to add a step where the driver makes this determination at every service. 99.9% of the time, the answer is going to be Automotive, but the customer type is more accurately defined by the sales rep at the time the account is set up in my opinion.

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: [678-544-2915](tel:678-544-2915) | MSchorr@universalenviro.com

<http://www.universalenvironmentalservices.com>

AVISTA OIL USA REDEFINING RE-REFINING



From: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>

Sent: Friday, July 7, 2023 10:00 AM

To: Mike Schorr <mschorr@universalenviro.com>

Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

Sir.

The Customer type does not indicate if it is automotive, industrial or mix used oil (F.A.C. Rule 62-710.510(1)(d)). You provided customer receipts in your email dated 4/18/2023 but there are no customer type codes on the receipts. We cannot determine what type of used oil, i.e. automotive, industrial or mixed, indicated in the receipts.



Wanda Robles

Environmental Specialist

Florida Department of Environmental Protection

Central District – Orlando

Wanda.Robles@FloridaDEP.gov

407.897.4126

From: Mike Schorr <mschorr@universalenviro.com>

Sent: Thursday, June 29, 2023 11:26 AM

To: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>

Cc: Lane Bryant <lbryant@universalenviro.com>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Lane Bryant <lbryant@universalenviro.com>; Scott Eddings <seddings@universalenviro.com>

Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Wanda,

Good morning. Universal Environmental Services maintains the used oil type in the customer set up database for each customer. F.A.C. Rule 62-710.510(1)(d) requires the customer type to indicate Automotive, Industrial or Mixed. F.A.C. Rule 62-710.510(1)(d) also allows for this information to be maintained on substantially equivalent forms which contain at least the same information as the Department form.

For internal purposes, Universal Environmental Services assigns a more detailed description of generator type at the time the account is set up. A list of these generator types is attached for reference. When volume reports are run to complete the annual reports, these generator types are used to report volumes of Automotive, Industrial or Mixed used oil

Previous FDEP inspections have concurred that Universal Environmental Services tracking system was in compliance with the requirements of F.A.C. Rule 62-710.510(1)(d).

Could we set up a call or arrange a meeting to discuss this further please?

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: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>

Sent: Monday, June 26, 2023 3:15 PM

To: Mike Schorr <mschorr@universalenviro.com>

Cc: Lane Bryant <lbryant@universalenviro.com>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Lane Bryant <lbryant@universalenviro.com>; Scott Eddings <seddings@universalenviro.com>

Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

We don't see the type of used oil received, using the type code designation, per Florida Administrative Code F.A.C. Rule 62-710.510(1)(d), in the records you provided. Please indicate how you will meet this requirement. Provide information by June 30, 2023 to avoid escalate enforcement.

Thank you



Wanda Robles
Environmental Specialist
Florida Department of Environmental Protection
Central District – Orlando
Wanda.Robles@FloridaDEP.gov
407.897.4126

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Tuesday, April 18, 2023 5:55 PM
To: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Cc: Lane Bryant <lbryant@universalenviro.com>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Lane Bryant <lbryant@universalenviro.com>; Scott Eddings <seddings@universalenviro.com>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Wanda,

Good afternoon. Below and attached you will find the information that you requested. I wanted to confirm that the attached service record files will not become publicly available documents as a part of the inspection records. These documents contain confidential business information.

- Service records of used oil filters and used oil collection manifest for the week of January 16-22, February 20-26 and March 13-19 of 2023
- Used Oil Collection Employee Training Records. If you would like a copy of the "Guard Tank" training program, I can forward that to you.
- Florida Administrative Code F.A.C. Rule 62-710.510(1)(d). You indicated that the below information was missing from the used oil manifest. Each registered person shall maintain records on DEP Form 62-710.901(2), or on substantially equivalent forms which contain at least the same information as the Department form. (The type of used oil received, using the type code designation found in the form instructions.)
 - Universal Environmental Services maintains the type of used oil as a part of our Generator/Customer Records. This information does not print over onto the individual manifests. Any customer that is set up in our customer database is identified by "Customer Type". The Customer Type options that are tracked are included on the attached document. 100% of the used oil volume is transferred to another facility for processing. An example of this was provided on the transfer report that was provided the day of the inspection.
- There are four containment with used oil filters that were not staged on an oil impermeable surface and one of them without label "Used Oil Filters".
 - The used oil filter container was labeled the day of the inspection. A photo of this corrective action is attached.
 - Regarding the impermeable surface, the containers are located on concrete. UES proposes the following corrective action. In accordance with specifications for concrete containment repairs, construction and coatings as referenced in 62-762, FAC., the concrete storage area will be inspected and repaired if necessary, and then will be sealed using a FDEP approved coating.

Upon review of the attached information, please let me know if you would like to set up a call or an in person meeting to discuss and responses.

In the meantime, if you have any questions or require additional information, please feel free to call or reach me by e-mail.

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: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>

Sent: Tuesday, April 11, 2023 8:43 AM

To: Mike Schorr <mschorr@universalenviro.com>

Cc: Lane Bryant <lbryant@universalenviro.com>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>

Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

Good afternoon Mr. Schorr

Thank you for meeting by phone with the DEP inspectors on, April 4, 2023 for the compliance inspection at Universal Environmental Services. After reviewed the documents submitted. Please provide the following documents.

1. Provide records of used oil filters and used oil collection manifest and details shipment records for the week of January 16-22, February 20-26 and March 13-19 of 2023.
2. Employee Training records
3. The example of used oil collection manifest provided is missing some information. The type code and the end code of the used oil.

Florida Administrative Code F.A.C. Rule 62-710.510(1)(d)

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.

(d) The type of used oil received, using the type code designation found in the form instructions (Attached DEP form)

Also during the inspection,

4. There are four containment with used oil filters that were not staged on an oil impermeable surface and one of them without label "Used Oil Filters"

Florida Administrative Code F.A.C. Rule 62-710.850(5)(a)

All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface. Please provide photos of the corrective action.

5. After further review of your used oil activities it was determined that Universal Environmental Services does not meet the definition of a used oil marketer found in F.A.C. Rule 62-710.201(10).

Please respond with corrective actions by Tuesday, April 18, 2023.



Wanda Robles
Environmental Specialist
Florida Department of Environmental Protection
Central District – Orlando
Wanda.Robles@FloridaDEP.gov
407.897.4126

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Tuesday, April 4, 2023 12:46 PM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Cc: Lane Bryant <lbryant@universalenviro.com>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Michael / Wanda,

Thank you for your time this morning. Attached you will find the following.

- Annual report for 2022.
- FDEP Liability Insurance
- Example of used oil collection manifest. Each service performed is identified by a Transaction number "TX". We can provide the TX for any services performed that you require.
- Transfer report showing used oil shipments transferred out of the facility to our re-refinery in Georgia to support no storage for greater than 35 days. To date, there have been 217 shipments.

Please let me know what additional information you will need.

Sincerely,

Michael Schorr, CHMM
Director, Governmental and Regulatory Affairs
T: 678-544-2915 | MSchorr@universalenviro.com
<http://www.universaleenvironmentalservices.com>



From: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Sent: Monday, April 3, 2023 10:35 AM
To: Mike Schorr <mschorr@universalenviro.com>
Cc: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

Okay, great! Talk with you then.

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Monday, April 3, 2023 10:15 AM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Cc: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Subject: Re: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Michael,

Thank you for checking. If that is ok with you, I will have Lane call me to begin the inspection. I'd like to explain our record keeping system as it is all electronic. I will be able to pull any manifest related information from it that you may need as a part of the inspection.

Sincerely,

Michael Schorr, CHMM
Director, Governmental and Regulatory Affairs
T: 678-544-2915
MSchorr@universalenviro.com
<http://www.universalenvironmentalservices.com>



On Apr 3, 2023, at 8:17 AM, Eckoff, Michael <Michael.Eckoff@floridadep.gov> wrote:

Hi Michael,

I have heard back from some of the inspectors and they cannot change their schedule. Sorry about that. Will Mr. Bryant be calling you to join the inspection?

Thanks,
Michael

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Monday, April 3, 2023 8:06 AM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Cc: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Subject: Re: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Michael,
Ok. Thank you. If your schedules are unable to be adjusted, I would like to join in via phone if possible. Our site Manager Lane Bryant will meet you at the site.

Sincerely,

Michael Schorr, CHMM
Director, Governmental and Regulatory Affairs
T: 678-544-2915
MSchorr@universalenviro.com
<http://www.universalenvironmentalservices.com>



On Apr 3, 2023, at 7:47 AM, Eckoff, Michael <Michael.Eckoff@floridadep.gov> wrote:

Good morning Michael,

Let me check with the other inspectors that are participating. We have other inspections scheduled this week but may be able to change things around. I should get back with you this afternoon.

Thanks,
Michael

From: Mike Schorr <mschorr@universalenviro.com>
Sent: Friday, March 31, 2023 4:58 PM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Cc: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>
Subject: RE: [External] Universal Environmental Services, LLC - RCRA inspection

EXTERNAL MESSAGE

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

Michael,

Good afternoon. I would like to be in attendance for this inspection, however I have a personal commitment on Tuesday. Could we possibly perform this inspection on Wednesday, Thursday or Friday?

Sincerely,

Michael Schorr, CHMM

Director, Governmental and Regulatory Affairs

T: [678-544-2915](tel:678-544-2915) | MSchorr@universalenviro.com

<http://www.universalenvironmentalservices.com>

<image001.jpg>

From: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>

Sent: Friday, March 31, 2023 8:02 AM

To: Mike Schorr <mschorr@universalenviro.com>

Cc: Robles, Wanda <Wanda.Robles@FloridaDEP.gov>

Subject: [External] Universal Environmental Services, LLC - RCRA inspection

Good morning Mr. Schorr,

Department personnel will be conducting an inspection of Universal Environmental Services, LLC, located at 456 Cypress Rd., Ocala, FL 34472, on Tuesday, April 4, 2023. The inspectors plan to arrive at approximately 9:30AM.

Please let me know if you have any questions.

Thank you,

<image002.jpg>

Michael Eckoff

Environmental Consultant

Compliance Assurance Program

Central District

michael.eckoff@floridadep.gov

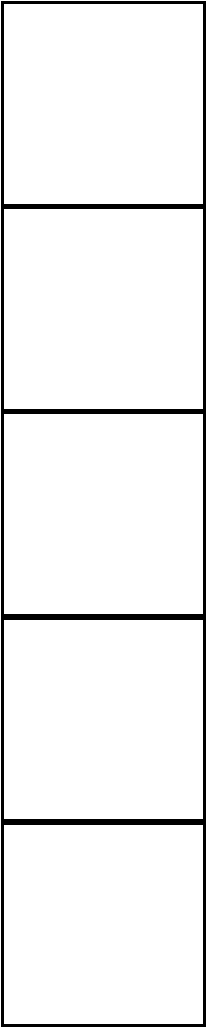
Office: 407.897.4308

<image003.png>

Looking to file a Notice, Registration, or Self-certification? Need a permit determination fast? You can even submit a permit application and make a payment! Try DEP's Business Portal. It's easy and quick. Just click the button below.

<image004.png>

<image005.jpg>



Select - Customer Types

Code	Description	Used Oil Type
1	Used oil generator sites	Automotive
1A	New and Used Car	Automotive
1B	Oil change facility	Automotive
1C	Vehicle repair	Automotive
1D	Transmission repair	Automotive
1E	Tire retail/service	Automotive
1F	Muffler replacement	Automotive
1G	Parts retailer	Automotive
1H	Vehicle renting	Automotive
1HAZ	Industrial Hazardous Generator	N/A
1I	Equipment renting	Automotive
1J	Engine repair	Automotive
1K	Wrecking yard/tow	Automotive
1L	Car wash/Lube	Automotive
1M	Truck stop	Automotive
1N	Marine sales	Automotive
1O	Motorcycle Sales	Automotive
1P	Fleet Service/Maintenance	Automotive
2	Transportation Providers	Automotive
2A	Public Transportation	Automotive
2AI	State/Local Bus Operations	Automotive
2AII	BOE School Bus Operations	Automotive
2AIII	Railroads	Mixed
2B	Private Bus Companies	Automotive
2C	Taxis and Limo Operators	Automotive
2D	Airport and Airlines	Mixed
2E	Trucking Companies	Automotive
2F	Package delivery companies	Automotive
2M	MSHA Customer	Mixed
3	Government Agencies	Mixed
3A	Military Bases	Mixed
3B	Police and Fire vehicle repair	Automotive
3C	Ambulance/Emergency transport	Automotive
3D	FEMA	Mixed
3E	Army Corps of Engineers	Mixed
3F	US Postal Service	Automotive
3G	Port Authority/Harbor Patrols	Mixed
4	Industrial generators	Industrial
4A	Metalworking Operations	Industrial
4AI	Rolling Mills	Industrial
4AII	Stamping centers	Industrial
4AIII	Container Manufacturing	Industrial
4B	Container Cleaning/Recondition	Mixed
4BI	Industrial Packaging	Mixed
4BII	Tanks	Mixed
4BIII	Tank Trucks/ISO containers	Mixed
4BIV	Barges	Mixed
4C	Construction equipment service	Mixed
4D	Environmental Service provider	Mixed

4E	Engine/Machine manufacturing	Mixed
4F	Process operations	Industrial
4G	Scrap yards/Auto dismantling	Automotive
4H	Contractor	Mixed
4I	Farms	Mixed
4J	Hydraulic Repair Shop	Mixed
4K	Independent Oil Collectors	Mixed
4L	Property Management	Mixed
4M	PFO Delivery Customers	Mixed
4N	Landscape Company	Mixed
4O	Agricultural	Mixed
4P	New Oil Vendor	Mixed
4Q	Medical Facility	Mixed
5A	Re-Refinable	Mixed
5B	NonRefinable	Mixed