## Thursby, Kim

Shaunte Stallworth [shaunte.stallworth@iwsww.com] From:

**Epost HWRS** To:

Sent:

Thursday, November 29, 2007 12:59 PM Read: Industrial Water Services, Inc.;FLD 981 928 484;Notice of Deficiency Subject:

Your message

shaunte.stallworth@iwsww.com To:

Subject:

was read on 11/29/2007 12:59 PM.

## Thursby, Kim

From: Epost HWRS

Sent: Thursday, November 29, 2007 12:50 PM

To: shaunte.stallworth@iwsww.com

**Cc:** Bodin, Christopher; Neves, Richard; Hornbrook, Frank; Martin, Lee;

charles.dudley@iwsww.com; admin@mittauer.com; Bahr, Tim; Prusty,

Rabin; Kothur, Bheem

Subject: Industrial Water Services, Inc.;FLD 981 928 484;Notice of Deficiency

Attachments: 11-29-07-IWS Permit Application NOD Letter.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to <a href="mailto:epost\_hwrs@dep.state.fl.us">epost\_hwrs@dep.state.fl.us</a>. If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at <a href="https://www.adobe.com/products/acrobat/readstep2.html">www.adobe.com/products/acrobat/readstep2.html</a>.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost\_hwrs@dep.state.fl.us

Tracking:

Recipient	Delivery	Read
shaunte.stallworth@iwsww.com		
Bodin, Christopher	Delivered: 11/29/2007 12:50 PM	
Neves, Richard	Delivered: 11/29/2007 12:50 PM	
Hornbrook, Frank	Delivered: 11/29/2007 12:50 PM	Read: 11/29/2007 12:53 PM
Martin, Lee	Delivered: 11/29/2007 12:50 PM	
charles.dudley@iwsww.com		
admin@mittauer.com		
Bahr, Tim	Delivered: 11/29/2007 12:50 PM	
Prusty, Rabin	Delivered: 11/29/2007 12:50 PM	
Kothur, Bheem	Delivered: 11/29/2007 12:50 PM	
Byer, James		Read: 11/29/2007 12:55 PM



## Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

November 29, 2007

SENT VIA E-MAIL shaunte.stallworth@iwsww.com

Shaunte Stallworth, Compliance Manager Industrial Water Services, Inc. 1010 East Adams Street Jacksonville, FL 32202

RE: Industrial Water Services, Inc.

Jacksonville Facility Used Oil Permit Renewal

EPA ID No.: FLD 981 928 484

Permit Nos: 72815-HO-009 and 72815-SO-010

Notice of Deficiency

Dear Ms. Stallworth:

The Florida Department of Environmental Protection (Department) has received your permit renewal application dated October 17, 2007 to operate a Used Oil Processing and Solid Waste Management Facility at 1650 Talleyrand Avenue, Jacksonville, Florida.

The review of the permit renewal application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies (two copies to Tallahassee and one copy to Northeast district office) of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Shaunte Stallworth, Compliance Manager November 29, 2007 Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: <a href="mailto:rabin.prusty@dep.state.fl.us">rabin.prusty@dep.state.fl.us</a>.

Sincerely,

Bheem Kothur, P.E. III Hazardous Waste Regulation

Phaemaio

BK/rp Enclosure

cc: Chris Bodin, DEP/Jacksonville, <a href="mailto:christopher.bodin@dep.state.fl.us">christopher.bodin@dep.state.fl.us</a>
Richard Neves, DEP/Tallahassee, <a href="mailto:richard.neves@dep.state.fl.us">richard.neves@dep.state.fl.us</a>
Frank Hornbrook, DEP/Tallahassee, <a href="mailto:frank.hornbrook@dep.state.fl.us">frank.hornbrook@dep.state.fl.us</a>
Lee Martin, DEP/Tallahassee, <a href="mailto:lee.martin@dep.state.fl.us">lee.martin@dep.state.fl.us</a>
Charles Dudley, IWS, <a href="mailto:charles.dudley@iwsww.com">charles.dudley@iwsww.com</a>
Joseph Mittauer, Mittauer & Associates, Inc., <a href="mailto:admin@mittauer.com">admin@mittauer.com</a>

## ATTACHMENT November 29, 2007 Industrial Water Services, Inc. Jacksonville, Florida EPA I.D. No. FLD 981 928 484 Notice of Deficiency

- **1. Part I, page 8 # 11:** Please correct the entry in Part I, page 8 # 11, by entering the name of the Corporation which owns Industrial Water Services, Inc.
- **2. Attachment C.4, page1:** Please include in this section a statement that IWS is operating as a Used Oil transporter and transfer facility. Also check the appropriate items in Application Part I, page 8,#3.
- **3. Attachment C.6&7, page11:** The SPCC plan certification page must be signed by the management.
- 4. **Site Map and Tank Table:** Please provide a site map (8 ½"x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½ "x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table can be attached to the permit. Also include hard copies of the map and tank table with your response.
- **5. Closure Cost Estimate Form:** Please provide justification for changes in the submitted cost estimate amount. However, the Department has not received the DAF tank closure Certification Report. Until the closure Certification Report has been accepted by the Department, the facility cannot reduce the cost estimates from \$250,000.00 to \$235,346.00. Please review, revise and resubmit closure cost estimates.