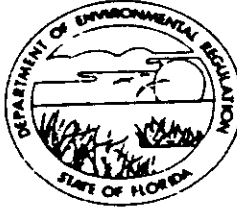


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.
TAMPA, FLORIDA 33610-9544

813-623-5561
SunCom-552-7612

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

DR. RICHARD D. GARRITY
DEPUTY ASSISTANT SECRETARY

September 30, 1988

Tim's Oil Recovery, Ltd.
843 - 43rd Street South
St. Petersburg, Florida 33711

OCT - 3 1988



Attn: Mr. Tim Hagan

Dear Mr. Hagan:

Re: Warning Notice #52-88-01-003

The Department has reviewed your response to the referenced Warning Notice and attached submittals. Your customer log is not adequate for tracking shipments of on and off-specification used oil fuel under 40 CFR Part 266. The log cross-references the batch analysis, but not the invoice number. The invoice does not refer back to the log, batch or analysis results and the sample provided did not have a date, as required by 40 CFR 266.43(b)(4)(v). The log does not include a reference to the plant location, as required by 40 CFR 266.43(b)(6)(i)(A).

Further proof that the system is inadequate is that batch #244-126, which was off-specification due to cadmium, was shipped to OH Materials and unspecified Duval Asphalt plants. These customers are not on your list of approved off-specification fuel customers. In addition, they have not notified EPA of their off-specification used oil fuel activities.

Your batch #243-129, (off-specification due to lead) is listed as having been sold to Ajax Paving Plants #1 and #2. Your customer list does not include Ajax Plant #2, only Plants #1 and #3. The EPA identification number listed for Plant #3 was used for the sample invoice to Plant #2.

Mr. Tim Hagan
Tim's Oil Recovery, Ltd.

September 30, 1988
Page Two

The Department has records of three Ajax facilities:

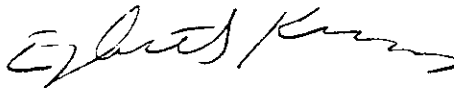
<u>ID #</u>	<u>Location</u>	<u>current status</u>
FLD 982 165 730	Rt A Box 79-A Punta Gorda	exempt SQG
FLD 981 754 948	Rt A Cook Brown Rd. Punta Gorda	used oil burner
FLD 981 754 591	2290 SR 771 Placida, FL	used oil burner

Sample copies of your notices from these Facilities were not provided for review. However, you are aware that an EPA identification number is specific to one location. When a plant relocates, a new number is required.

Your sample invoice did not include the statement "this used oil is subject to EPA regulation under 40 CFR Part 266".

You are requested to respond to this letter within 20 days with a plan to remedy the indicated deficiencies in your record keeping. If you have any questions, please call me at 813/623-5561.

Sincerely,



Elizabeth Knauss
Environmental Supervisor I
Division of Waste Management

EK/br

cc: David Kelley, BWM
Liz Merrill, NED
Richard Tedder, CFD
Tony Fotovat, SFD