

Thursby, Kim

From: Ed Kinley <EKinley@uestampa.com>
Sent: Wednesday, December 10, 2014 9:52 AM
To: Epost HWRS (Shared Mailbox)
Cc: Bahr, Tim; Baker, Bryan; Knauss, Elizabeth; McGinnis, Sean; Ross, Brynna; Eldredge, Susan F.; Svec, John; kcoates@acgtampa.com; Kothur, Bheem; Tripp, Anthony
Subject: RE: Universal Environmental Solutions, LLC-Tampa; FLR 000 199 802;Notice of Deficiency

Hello Bheem et all. We are in receipt of your reply / latest correspondence and will be re-submitting prior to the 30 Days deadline.

Kindest Regards,

Ed Kinley



Ed Kinley, President
(813)390-0659

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Friday, December 05, 2014 12:17 PM
To: 'ekinley@uestampa.com'
Cc: Bahr, Tim; Baker, Bryan; Knauss, Elizabeth; McGinnis, Sean; Ross, Brynna; Eldredge, Susan F.; Svec, John; 'kcoates@acgtampa.com'; Kothur, Bheem; Tripp, Anthony
Subject: Universal Environmental Solutions, LLC-Tampa; FLR 000 199 802;Notice of Deficiency

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting 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 epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). 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 www.adobe.com/products/acrobat/readstep2.html.

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.

Bryan Baker, P.G.
Program Administrator
Permitting & Compliance Assistance Program
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us





**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

December 05, 2014

SENT VIA E-MAIL

ekinley@uestampa.com

Mr. Edward Kinley, President
Universal Environmental Solutions, LLC
P.O. Box #76105
Tampa, Florida 33675

RE: Universal Environmental Solutions, LLC-Tampa Facility
EPA I.D. No. FLR 000 199 802
Permit Numbers: 330300-HO-001
Used Oil Processing Facility Permit Applications
Notice of Deficiency

Dear Mr. Kinley:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated October 16, 2014 and received on November 04, 2014 to operate a Used Oil Processing Facility in Tampa, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. 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.

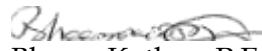
The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Mr. Edward Kinley, President
December 05, 2014
Page Two

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit one hard copy and one electronic copy of your written response to the Tallahassee Permitting and Compliance Assistance Program, and one hard copy to the Southwest District Office. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Program and Permitting

BK/bk

Enclosure: Attachment

cc: Beth Knauss, FDEP/Southwest District, Elizabeth.Knauss@dep.state.fl.us
Sean McGinnis, FDEP/Southwest District, Sean.McGinnis@dep.state.fl.us
Brynna Ross, OGC/Tallahassee, Brynna.Ross@dep.state.fl.us
Susan Eldredge, FDEP/Tallahassee, susan.eldredge@dep.state.fl.us
John Svec, FEDP/Tallahassee, john.svec@dep.state.fl.us
Keith Coates, Seavy & Associates, kcoates@acgtampa.com

ATTACHMENT
December 05, 2014
Universal Environmental Solutions, LLC
Tampa Facility, Florida
EPA I.D. No. FLR 000 199 802
Permit No. 330300-HO-001
Notice of Deficiency

General Comments:

1. Permit Renewal Application Cover Letter dated October 16, 2014: The subject facility I.D. should be "FLR 000 199 802" instead of "FLR 000 199 80". Please review and correct the subject cover letter as appropriate in future correspondence.
2. Used Oil Processing Facility Permit Application, Part I, Item 3, Marketers, Page 1 of 8: It appears that the facility marked as "Marketer". However, in the DEP inspection report dated August 12, 2014 it is noted that "Universal does not market used oil". Please review and revise as appropriate and also revise and re-submit the 8700-12FL Form (accessible at http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-730/730_1b.pdf), accordingly.
3. Used Oil Processing Facility Permit Application, Part I, Item 9, Page 1 of 8: Please verify the contact person telephone number and revise as appropriate.
4. Used Oil Processing Facility Permit Application, Part I, Item 13, Site Ownership Status, Page 2 of 8: Please review the lease expiration date and update as appropriate.
5. Tab 1, Attachment 1, Sub-Section 1.1, Detailed Facility Processes Figures, Third Line: Please identify the appropriate Tab and Attachment for Sub-Section 1.7 and Sub-Section 1.8, etc. through the permit application.
6. Tab 1, Attachment 1, Facility Detailed Processes Description, Sheet 3 of 3, Processes Flow Map, Page 5: Please provide the detailed calculations for secondary containment for the Frac Tank Storage Area and Main Tank Storage Area. Also, identify the Roll-Off Area on this map. Processes Flow Map should also identify Evacuation Routes and gathering places during an emergency situation.

7. Tab 2, Attachment 2, Facility Description, Sub-Section 2.2- Waste Management Unit Designations, Third Line, Page 9: Please Identify Section B.3-Figure 3?
8. Tab 3, Attachment 3, Detailed Process Flow Description, Page 11: The facility should include details of petroleum contact water (PCW) management practices, including descriptions of product receipt, water separation and shipment of reclaimed product to the ultimate user or to another recycler. DOT compliance is a concern regarding identification of gasoline/diesel mixtures. Please see Comment 29 in this document regarding information for compliance and training per USDOT.
9. Tab 4, Attachment 4, Waste Analysis plan, and Sampling Plan, On-Specification Claim, 40 CFR 279.11, on-Specification Criteria, Analytical Testing, Page 22: Please add Sulfur, and Total Halides parameters to the list. Please explain and or provide Rebuttable Presumption Analysis Flow Chart to the Application.
10. Tab 4, Attachment 4, Waste Analysis Plan, Industrial Wastewater: Information on the facility's centralized wastewater treatment permit under the Clean Water Act should be referenced in this section, if non-hazardous industrial wastewater is accepted for treatment. What categories of wastewaters are accepted? Is the facility's permit under Subcategory A (metals), B (oils), C (organics), or D (multiple waste streams subcategory)? Also, information regarding industrial wastewater in this application, it must be made clear that the permit being issued is for disposal of industrial wastewater.
11. Tab 5, Attachment 5, Sludge, Residue, And Byproduct Management Plan, Page 30: It appears that the sampling was conducted on September 8, 2014 to determine the waste stream to be non-hazardous. It is not clear that this sampling will be done annually, semi-annually, or quarterly. If it is proposed for annually, then this is not acceptable. However, the hazardous waste determination should be made semi-annually at minimum to verify any changes in the documented TCLP parameters.
12. Tab 5, Attachment 5, Sludge, Residue, And Byproduct Management Plan Page 30: Please show on a map where the waste sludge is transferred to an on-site roll-off for sampling and disposal. Please ensure that the sludges are also tested semi-annually.
13. Tab 6, Attachment 6, Tracking Plan, 6.1.1-What are halogens?, the Second Sentence, Page 31: The second sentence should be re-worded to read that "the following wastes are often mixed with used oil and may be contaminated with halogenated organic compounds".

14. Tab 6, Attachment 6, Tracking Plan, 6.1.4.2-Testing, Page 33: It appears that during the inspection, the facility indicated that they did not use TIF sniffers, and only used Dexil Kits. However, 6.1.4.2 refers to sniffers. Please review and revise as appropriate.
15. Tab 6, Attachment 6, 6.2-Waste Tracking Documents, 31: Facility must provide a sample field documentation form that you will use for sampling and recordkeeping. Also, the facility must maintain a sample log noting the date and time of sampling, the name of the sampler, the container or tank samples, analytes, the lab analysis number for cross reference, etc. This is so that every sample can be tracked to its analysis, and every analysis can be tracked to a specific sample. Please see the FDEP 62-160, F.A.C., QA/QC Rule and SOP's.
16. Tab 8, Attachment 8, Contingency Plan and SPCC Plan, Page 55: Please show the location of all emergency equipment on a map.
17. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, Record Keeping And Reporting, State & Local Agencies, Page 75: Please update the FDEP Tallahassee (normal business hours) phone number to read (850) 245-8707, the State Warning Point (24 hour-spill contact) phone number to read (800) 320-0519 and EPA Emergency Response (Atlanta) phone number to read (404) 562-8700.
18. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, Page 75: Please provide all agencies physical mailing addresses.
19. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, Emergency Contacts, Page 75: Please add the Oil Spill Contractor name and their emergency contact phone number. Also, add local addresses for all Emergency Contacts to the list.
20. Tab 8, Attachment 8, Spill Prevention, Control, And Countermeasure Plan, Fire Protection And Emergency Action Plan, Statement Of Policy, Page 86: The policy statement must be signed by appropriate facility manager.
21. Tab 8, Attachment 8, Contingency Plan SPCC Plan, 75: Please add Hazardous Materials Clean-up Contractor and Alternate Emergency Coordinator Cell phone numbers, respectively.
22. Tab, 8, Attachment 8, Contingency Plan, SPCC Plan Page 80: Facility has listed contact numbers for the police and EMTs. In addition to this, please provide numbers of the closest fire and police station, as well as, the nearest hospital. Facility may list both and instruct their people to call but both numbers need to

be there. Also need to include your outside cleanup contractor information here. Facility's primary and secondary emergency coordinators phone numbers and home mailing address must be included. Please review and revise as appropriate.

23. Tab 8, Attachment 8, Contingency Plan/SPCC Plan, Page 62: Please review the P.E., Certification page. This page needs to be signed.
24. Tab 9, Attachment 9, Unit Management Plan, Sub-Section 9.3-Tank Certification, Page 106: Please obtain the Variance letter from the Department and attach the same.
25. Tab 10, Attachment 10, Closure Plan, Sub-Section 10.9- Closure Cost Estimates, Page 131: The Certification By Engineer and Owner/Operator is incomplete. Please review this page. This page needs to be signed.
26. Tab 10, Attachment 10, Table 10.2-1, Waste Management Unit Information, Page 121: Please identify the PCW tank to the tank table.
27. Tab 10, Attachment 10, Closure Plan, Closure of Tank Storage: All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.
28. Tab 10, Attachment 10, Closure Plan, Closure Cost Estimate, Page 130: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items.
29. Tab 11, Attachment 11, Employee Training, Page 136: The employee training program does not include USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. Universal Environmental Solutions, LLC used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor-D-tect kits will not assess the flammability of the materials Universal Environmental Solutions, LLC may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.
30. Tab 11, Attachment 11, Employee Training, Page 136: This Section needs to be expanded. Also state that writer training records including name of the employee, date and type of training will be kept at the site.

31. Tank Inspection: The facility must provide documentation of each Tank's last detailed inspection, installation and certification to the Department.
32. Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be added to the permit.
33. Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this table can be added to the permit.
34. Solid Waste Permit Application: The facility expressed their interest through a conference call on December 4, 2014 to obtain a combined permit including Solid Waste Permit to operate solid waste operations as bulking and solidification of oily waste and petroleum impacted soil and groundwater, with reference to the used oil application for further details. However, the details provided in the used oil application with respect to the bulking, solidification, and management of non-hazardous oily wastes were not adequate to address the items in this permit application. Therefore, DEP explained about the Solid Waste Permit Application, Short Version, 62-710.900(4), F.A.C., and the permit fee of \$2,000.00 required to process. Please review and let me know your thoughts and decisions.