

Thursby, Kim

From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Thursday, February 09, 2017 3:06 PM
To: Epost HWRS (Shared Mailbox)
Subject: RE: Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484; Minor Permit Modification: To add Four (4) Fats, Oils, and Grease (FOG) Tanks with a Capacity of Total 115,000 Gallons

This is to verify the receipt of the referenced document.

Yuri Turovsky

Liquid Environmental Solutions
1640 Talleyrand Ave
Jacksonville, FL 32206
904-438-2138 main
904-265-2109 direct
904-509-2032 cell
904-353-4033 fax
www.liquidenviro.com

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From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Thursday, February 09, 2017 2:09 PM
To: Yuri Turovsky
Cc: Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; 'Merizalde.carlos@epa.gov'; Dilmore, Cory; McBride, Ashanti; Eldredge, Susan F.; Fellabaum, Pamela; 'admin@mittauer.com'; Kothur, Bheem
Subject: Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484; Minor Permit Modification: To add Four (4) Fats, Oils, and Grease (FOG) Tanks with a Capacity of Total 115,000 Gallons

Please delete first e post sent on this. Had to delete draft and put today's date on it for date of issue so this one is the corrected one.

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.

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.
Environmental Administrator
Hazardous Waste Program & Permitting





Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

February 9, 2017

Mr. Yuri Turovsky, Plant Manager
Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida 32206
yuri.turovsky@liquidenviro.com

SUBJECT: Liquid Environmental Solutions of Florida, LLC
EPA ID Number: FLD 981 928 484
Used Oil Processing Permit Numbers: 72815-H0-016/72815-SO-017
County: Duval;
Minor Permit Modification: To add Four (4) Fats, Oils, and Grease (FOG)
Tanks with a Capacity of Total 115,000 Gallons.

Dear Mr. Turovsky:

This letter is in response to your request to modify your permit for the addition of four (4) FOG Tanks numbered 112, 113, 114, and 115. Upon review, the Department finds your request is satisfactory. Therefore, pursuant to Section 403.769, Florida Statutes, and Chapters 62-701 and 62-710, Florida Administrative Code (F.A.C.), the Department modifies the permit issued April 17, 2013 and previously modified on June 30, 2015. This permit modification becomes effective immediately. All other conditions of the permit remain unchanged. This letter and the attached revised pages of the permit must be attached to the existing permit and become part of that document. As Permittee, you have appellate rights as set forth in the enclosed Notice of Rights.

If you have any questions, please contact Bheem Kothur at 850-245-8781 e-mail:
bheem.kothur@dep.state.fl.us.

Mr. Yuri Turovsky, Plant Manager


February 09, 2017

Page 2

Issued: February 9, 2017

STATE OF FLORIDA

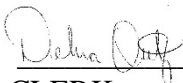
DEPARTMENT OF ENVIRONMENTAL PROTECTION



KIMBERLY A, WALKER, PROGRAM ADMINISTRATOR
PERMITTING AND COMPLIANCE ASSISTANCE PROGRAM

Filing and Acknowledgment

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.



CLERK

February 9, 2017

DATE

KAW/bk

Enclosure

cc: (with enclosure)

Brian Bastek, EPA Region 4, bastek.brian@epa.gov

Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov

Cory Dilmore, DEP Tallahassee, cory.dilmore@dep.state.fl.us

Ashanti McBride, OGC Tallahassee, Ashanti.mcbride@dep.state.fl.us

Susan Eldredge, DEP Tallahassee, susan.eldredge@dep.state.fl.us

Pam Fellabaum, DEP Northeast District, pam.fellabaum@dep.state.fl.us

Joseph Mittauer, Mittauer & Associates, admin@mittauer.com

NOTICE OF RIGHTS

1. If you dispute any issue of material fact raised by this permit modification, you have the right to a formal administrative hearing pursuant to Sections 120.569 and 120.57(1), Florida Statutes (F.S.). At a formal hearing, you will have the opportunity to be represented by counsel, to present evidence and argument on all issues involved, to conduct cross-examination and submit rebuttal evidence, to submit proposed findings of fact and orders, and to file exceptions to any order or hearing office's recommended order.
2. If you do not dispute any issue of material fact raised by this permit modification, you have the right to an informal administrative proceeding pursuant to Sections 120.569 and 120.57(2), F.S. If an informal proceeding is held, you will have the opportunity to be represented by counsel, to present to the agency written or oral evidence in opposition to the Department's Order, or to present a written statement challenging the grounds upon which the Department is justifying its proposed action.
3. If you desire a formal hearing or an informal proceeding, you must file a written "Petition for Administrative Proceeding" within 21 days of receipt of this Order. The petition must be in the form required by Rule 28-106.201(2) Florida Administrative Code (F.A.C.) A petition is "filed" when it is received by the Department's Agency Clerk, Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000.
4. You will waive the right to a formal hearing or an informal proceeding if a Petition is not filed with the Department within 21 days of the date you receive this permit modification. If you file a written request for extension of time within the time limit and show good cause for an extension, the Department may extend the time by issuing another written order.
5. Mediation is not available in the context of this Order.
6. A party who is adversely affected by this Order when it becomes Final is entitled to Judicial Review pursuant to Section 120.68, F.S. Review proceedings are governed by the Florida Rules of Appellate Procedure. Such proceedings are commenced by filing one copy of a Notice of Appeal with the Agency Clerk, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, and a second copy, accompanied by filing fees prescribed by law, with the First District Court of Appeal or with the District Court of Appeal in the Appellate District where the party resides. The Notice of Appeal must be filed within 30 days of rendition of the Order to be reviewed. The Order is rendered on the date it becomes Final. The Order becomes Final on the letterhead date, unless a Petition for formal hearing or informal proceeding is filed as outlined in this notice.

Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida

I.D. Number: FLD 981 928 484
Permit No: 72815-HO-015; 72185-SO-014
Expiration Date: November 20, 2017

PERMITTEE:

Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida 32206

I.D. Number: FLD 981 928 484
Used Oil Permit Number: 72815-HO-016
Solid Waste Permit Number: 72815-SO-017
Date of Issue: February 9, 2017
Expiration Date: November 20, 2017
County: Duval
Lat/Long: 30°20'36"N / 81°37'46"W

Attention:
Mr. Yuri Turovsky, Plant Manager

Project: Used Oil and Material Processing Facility

This is a permit issued under the provisions of Section 403 of the Florida Statutes (F.S.), Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740, 62-762 and 62-780 of the Florida Administrative Code (F.A.C.), and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated September 19, 2012 and revised or supplemented by submissions dated December 11, 2012, January 28, 2013, and March 18, 2013. The Permittee submitted a permit modification on February 26, 2015 and revised or supplemented by submissions dated May 22, 2015, May 26, 2015 and June 25, 2015. The Permittee submitted a subsequent permit modification on February 01, 2017 that are incorporated herein and collectively referred to as the "permit application." The permit application also includes any approved closure cost estimates and financial assurance, and approved drawing(s), plans and other documents attached hereto or on file with the Department and made a part hereto. The facility is specifically authorized and described as follows:

To operate a Used Oil and Material Processing Facility hereinafter referred to as the "Facility". The Used Oil and Material Processing Facility is located on an approximately 1.6-acre parcel of land leased by Liquid Environmental Solutions of Florida, LLC in Duval County, at 1640 Talleyrand Avenue, Jacksonville, Florida, 32206. Diagrams of the site layout and tank storage area are included as Attachment A of this permit. Tank capacity and contents are shown in Attachment B (Tank Table) of this permit.

The facility is authorized to process used oil, oily wastewater, petroleum contact water, used antifreeze, oily solid waste and used oil filters. Oily waters/wastewaters are separated and/or decanted and they are pretreated on-site prior to discharge off-site for disposal at a permitted facility.

The Facility currently consists of seventy six (76) tanks including eight (8) proposed tanks. All current tanks and piping are located within secondary containment. Twenty two (22) tanks are dedicated to used oil (UO), twenty three (23) tanks are dedicated to oily water (OW), two (2) tanks are dedicated to petroleum contact water (PCW), seven (7) tanks are dedicated to solids or sludge (S), three tanks (3) are dedicated to sludge and oily water (S/OW), fifteen (15) tanks are dedicated to waste water, two (2) tanks are dedicated to fuel and two tanks are dedicated to Fat, Oil & Grease (FOG) with additional four (4) more tanks dedicated to Fat, Oil & Grease (FOG). The primary and secondary materials stored in these tanks are as listed in Attachment B of this permit. The facility also includes an oil/water separator, a filter press and other ancillary processing equipment which includes sumps, pumps, piping and valves. The facility is authorized to store and use a total of 342,175-gallons of used oil in the aboveground storage tanks and related appurtenances currently in use at the facility. Details for specific tanks are listed in Attachment B of this permit. Tanks designated as wastewater storage tanks comprise a total of approximately 758,215 gallons. These

wastewater tanks are not part of this permit. The facility has a drum storage area consisting of approximately 1,000 square feet. The maximum number of drums of oily wastes awaiting processing on site at any one time shall not exceed 200 (two hundred) 55 gallon drums.

In addition, the Permittee may generate solid waste from their wastewater treatment processes and used oil processing. These wastewater treatment solids and oily solid wastes are placed into no more than five 20-cubic yard roll-off containers and shipped to a permitted, lined solid waste landfill for disposal.

Tank Inspection Report: The submittal of a tank inspection report has been deferred until after the issuance of this permit. The tank inspection reports are due no later than June 30, 2013 as specified in condition 10, Part II – Used Oil Processing Conditions of this permit. Facility submitted the report on January 16, 2013 and the inspection was conducted on May 31, 2013 through June 17, 2013. Any deficiencies noted in the inspection reports must be addressed in a timely manner.

The Permittee added two (2) new vertical, 20,000 gallon tanks (Tanks 110 and 111) for storage of Fats, Oils, and Grease (FOG) within the secondary containment area of tanks storing used oil. In addition to these, Permittee added three (3) more new vertical, 37,000 gallon tanks (Tank 112, 113, and 114), and one (1) more new vertical 4,000 gallon tank (Tank 115) for storage of Fat, Oil, and Grease (FOG). However, these tanks (tanks 110 and 115) are not permitted to be used for the storage or handling of used oil (as defined in 40 CFR 279.1).

Five – Year Plant Modification Plan:

As Liquid Environmental Services continues to improve its operations and facilities during the next five (5) years, the following activities are anticipated to occur:

Tanks 6 and 81 through 87: Tanks 6, and 83 through 87 are currently used to store oily water (OW), and Tanks 81 and 82 are currently used to store petroleum contact water (PCW). These tanks are to be Modified or Converted to use PCW or oily water within the five (5) year period of this permit. Please see Attachment B, Tank Table for further details.

Closure Requirements For The Former Hazardous Waste Tanks: The Permittee shall close Tanks 6, and 81 through 87, associated loading/unloading areas and secondary containment areas in compliance with the requirements of 40 CFR 264-Subpart G and 40 CFR 264.197, and Chapter 62-730 for closure of hazardous waste Tanks, as they were operated for the storage and processing of hazardous waste in the Temporary Operation Permit application dated December 16, 1991. For details, please refer to the Closure Plan as described in Attachment C-9 of the temporary operating permit application dated December 16, 1991, and Part V - Closure Conditions of this permit. LES must provide notification and a closure schedule to the department 30 days prior to the closure (conversion) of these tanks. Tanks 6 and 81 through 87 will be used to store oily water (OW), and/or petroleum contact water (PCW). Please see Attachment B, Tank Table for further details.

The addition of up to eight (8) new, vertical, 14,000 gallon tanks (Tanks 102-109) for the storage of oily water. These tanks will be located just south of the currently existing Tanks 1 and 2.

The Permittee shall submit as-built drawings for all the proposed or constructed new tanks within 30 days of completion of construction. Each drawing shall be certified and dated by a

Professional Engineer registered in Florida. The tanks cannot be used for permitted activities until the as-built drawings have been accepted by the Department.

The closure and removal of Tanks 3A, 3B, 4A, and 4B: These tanks and associated piping/equipment will be removed from the site and a drum storage/handling area will be located in place of the tanks. LES must provide notification and a closure schedule to the department 30 days prior to the closure (conversion) of these tanks. Within 30 days after closing these tanks, the Permittee shall submit a certification of closure completion to the Department that demonstrates that the tanks were closed in substantial compliance with the approved closure plan.

Three (3) 20,000 – gallon frac tanks: LES has entered the lease agreement for the adjacent property located immediately west and south of the existing plant. LES intends to deploy up to three (3) mobile 20,000-gallons frac tanks on the expanded property. The frac tanks will be used on an intermittent basis to store accumulated off-spec fuel prior to shipping to the end user for energy recovery. The tanks will be deployed for the period not exceeding 180 days and will have valid vehicle registration as per Rule 62-762.201(48), F.A.C. Each tank will be placed inside a portable secondary containment system. LES is planning to stage the tanks on the southern end of the expanded property. The locations of the property and the mobile tanks are shown on the Aerial Map, Figure 1 following Page 2 of the Revised Renewal Application dated December 11, 2012.

The following documents were used in preparation of this permit:

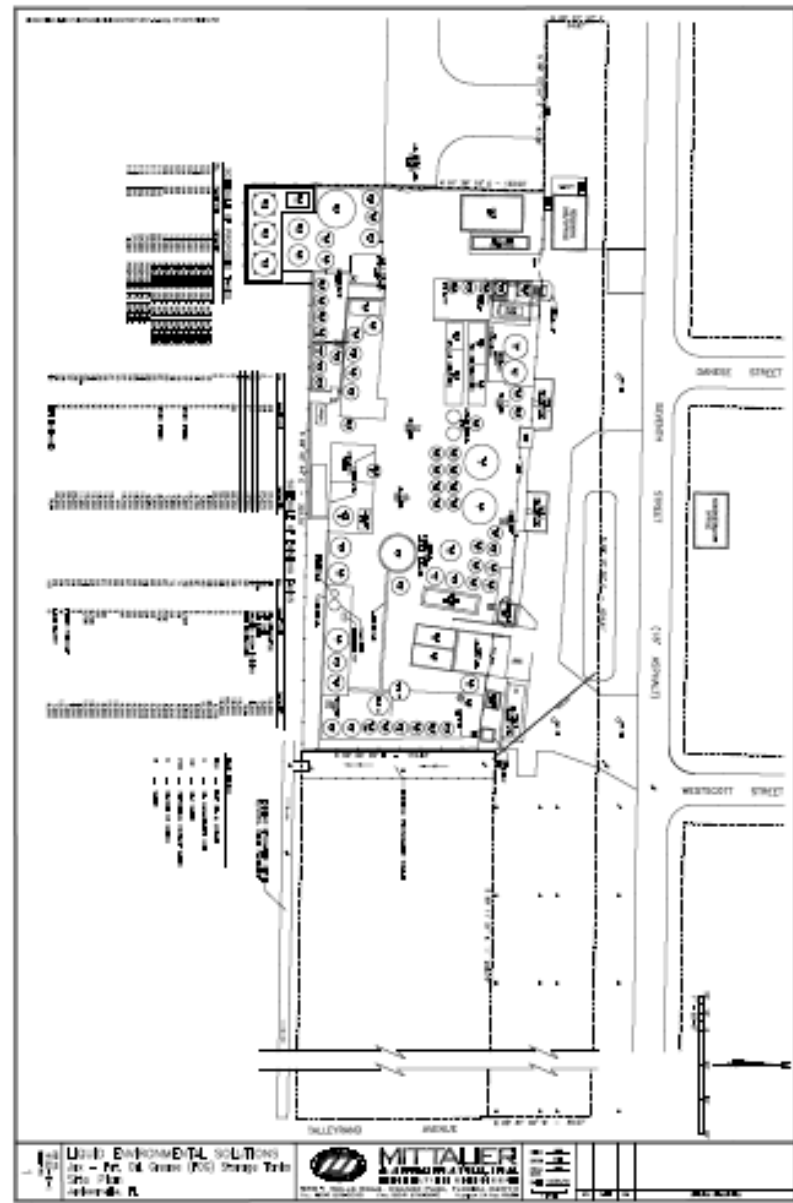
1. Temporary Operation Permit Application dated December 16, 1991.
2. Used Oil Processing Facility Permit HO16-308146, issued on November 20, 1997 and the Department addressed the closure of hazardous waste tanks in Part II-closure.
3. Closure Certification dated June 8, 2000 for Tanks 8, 10, 11, and 82B and Department acceptance dated October 20, 2000.
4. Closure Certification dated August 27, 2001 for Tank 9 and Department acceptance dated November 20, 2001.
5. Used Oil Processing Facility Permit Renewal Application dated August 26, 2002.
6. Additional information dated November 1, November 4, November 7, December 27, 2002 and January 15, 2003.
7. Operating Permit dated May 9, 2003.
8. Additional information dated January 13, July 9, and September 15, 2004.
9. Used Oil Processing Facility Permit Renewal & Solid Waste Management Facility Operation Application dated October 17, 2007

Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida

I.D. Number: FLD 981 928 484
Permit No: 72815-HO-015; 72185-SO-014
Expiration Date: November 20, 2017

10. Sludge Dryer Closure Report dated November 28, 2007.
11. Response to Department NOD dated January 11, 2008 and revised application dated April 9, 2008.
12. Permit Transfer Request dated December 22, 2009, and additional information dated December 31, 2009 and January 6, 2010.
13. Permit Renewal Application dated September 19, 2012.
14. DEP Request for Additional Information letter dated October 19, 2012.
15. Revised Application with the revisions to DEP dated December 11, 2012, January 28, 2013 and March 18, 2013.
16. Permit Minor Modifications Application dated February 19, 2015 and DEP received on February 26, 2015. DEP review and NOD comments letter dated March 25, 2015.
17. Site Rehabilitation Completion Order with conditions for closure of eight hazardous waste storage tanks, March 18, 2015. Supplemental Site Assessment Report Addendum, August 29, 2104. Supplemental Site Assessment Report, August 28, 2013.
18. Facility Response to Department NOD dated May 22, 2015 and June 25, 2015.
19. Facility submitted the Solid Waste Permit Application dated May 26, 2015 and DEP received June 01, 2015.
20. Facility submitted the Solid Waste Permit application dated January 31, 2017 and DEP received February 01, 2017.

**ATTACHMENT- A
SITE MAP**



Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida

I.D. Number: FLD 981 928 484
Permit No: 72815-HO-015; 72185-SO-014
Expiration Date: November 20, 2017

ATTACHMENT- B TANK TABLE

Liquid Environmental Solutions of Florida, LLC December 13, 2016						
TANK TABLE						
No.	Tank	Closure Capacity	Purpose	Regulated	Regulated Capacity	Less 2% (Overflow)
1	1	27,270	OW	Yes	27,270	26,725
2	2	27,270	OW	Yes	27,270	26,725
3	3A (R)	15,000	OW	Yes	15,000	14,700
4	3B (R)	15,000	OW	Yes	15,000	14,700
5	4A (R)	10,000	UO	Yes	10,000	9,800
6	4B (R)	20,000	UO	Yes	20,000	19,600
7	6	62,000	OW	Yes	62,000	60,760
8	7	22,000	WW	No		
9	8	22,000	WW	No		
10	9	23,000	WW	No		
11	10	4,800	UO	Yes	4,800	4,704
12	12	7,800	UO	Yes	7,800	7,644
13	14	9,750	UO	Yes	9,750	9,555
14	16	16,075	UO	Yes	16,075	15,754
15	17	1,200	VIRGIN FUELS	Yes		
16	18	9,950	UO	Yes	9,950	9,751
17	19	7,800	UO	Yes	7,800	7,644
18	20	7,800	UO	Yes	7,800	7,644
19	21	8,000	VIRGIN FUELS	Yes		
20	22	7,800	UO	Yes	7,800	7,644
21	23	9,950	UO	Yes	9,950	9,751
22	24	15,000	UO	Yes	15,000	14,700
23	25	15,000	UO	Yes	15,000	14,700
24	26	15,000	UO	Yes	15,000	14,700
25	27	15,700	UO	Yes	15,700	15,386
26	30	500	WW	No		
27	31	10,000	WW	No		
28	32	12,000	WW	No		
29	33	12,000	WW	No		
30	34	12,000	WW	No		
31	35	10,000	WW	No		
32	35A	11,850	WW	No		
33	36	20,000	WW	No		
34	37	20,000	WW	No		
35	38	30,000	WW	No		
36	39	30,000	WW	No		
37	51	15,000	UO	Yes	15,000	14,700
38	52	15,000	UO	Yes	15,000	14,700
39	53	85,000	UO	Yes	85,000	83,300
40	54	19,000	UO	Yes	19,000	18,620
41	55	9,750	UO	Yes	9,750	9,555
42	56	20,000	UO	Yes	20,000	19,600
43	60	12,000	S	Yes	12,000	11,760
44	61	8,000	S	Yes	8,000	7,840
45	62	8,000	S	Yes	8,000	7,840
46	70	9,500	S/OW	Yes	9,500	9,310
47	71	8,500	OW	Yes	8,500	8,370
48	72	8,500	OW	Yes	8,500	8,370
49	81	5,000	PCW	Yes	5,000	4,900
50	82	5,000	PCW	Yes	5,000	4,900
51	83	5,500	OW	Yes	5,500	5,390
52	84	5,500	OW	Yes	5,500	5,390
53	85	6,000	OW	Yes	6,000	5,880
54	86	6,000	OW	Yes	6,000	5,880
55	87	6,000	OW	Yes	6,000	5,880
56	88	6,000	OW	Yes	6,000	5,880
57	89	10,000	S	Yes	10,000	9,800
58	90	10,000	S	Yes	10,000	9,800

Liquid Environmental Solutions of Florida, LLC December 13, 2016						
TANK TABLE						
No.	Tank	Closure Capacity	Purpose	Regulated	Regulated Capacity	Less 2% (Overflow)
59	91	5,000	OW	Yes	5,000	4,900
60	92	5,000	OW	Yes	5,000	4,900
61	93	12,000	S/OW	Yes	12,000	11,780
62	94	12,000	S/OW	Yes	12,000	11,780
63	95	4,000	S	Yes	4,000	3,920
64	96	4,000	S	Yes	4,000	3,920
65	98	12,000	WW	No		
66	101	6,000	UO	Yes	6,000	5,880
67	102 (P)	14,000	OW	Yes	14,000	13,720
68	103 (P)	14,000	OW	Yes	14,000	13,720
69	104 (P)	14,000	OW	Yes	14,000	13,720
70	105 (P)	14,000	OW	Yes	14,000	13,720
71	106 (P)	14,000	OW	Yes	14,000	13,720
72	107 (P)	14,000	OW	Yes	14,000	13,720
73	108 (P)	14,000	OW	Yes	14,000	13,720
74	109 (P)	14,000	OW	Yes	14,000	13,720
75	110 (P)	20,000	FOG	Yes	20,000	19,600
76	111 (P)	20,000	FOG	Yes	20,000	19,600
77	112 (N)	37,000	FOG	Yes	37,000	36,260
78	113 (N)	37,000	FOG	Yes	37,000	36,260
79	114 (N)	37,000	FOG	Yes	37,000	36,260
80	115 (N)	4,000	FOG	Yes	4,000	3,920
Ancillary Equipment					913,215	894,951
1	40	N/A	Heat Exchanger	N/A		N/A
2	44	10,000	Oil Separator	Yes	10,000	9,800
3	45	2,000	DAF Unit	Yes	2,000	1,960
4	45A	1,000	DAF Inlet	Yes	1,000	980
5	47	4,200	DAF Clarifier	Yes	4,200	4,116
6	50	N/A	Heat Exchanger	Yes	N/A	N/A
7	97	1,000	Filter Press Precoat	Yes	1,000	980
8	99	1,000	Lime Slurry	No		
Totals		1,188,765			931,415	912,787
Tanks		88			68	68

Tank Legend	Number of Tanks	Total Volume	Less 2%
Used Oil (UO)	22	342,175	335,332
FUEL	2		
Oil Water (OW)	23	316,540	310,209
Petroleum Contact Water (PCW)	2	10,000	9,800
Sludge (S)	7	58,000	54,880
Sludge / Oil Water (S/OW)	3	33,500	32,830
Wastewater (WW)	15		
Fat, Oil and Grease (FOG)	6	155,000	151,900
	80	913,215	894,951

R - To be Removed within 5-Year Permit Renewal Period (Issued April 17, 2013)

P - Proposed within 5-Year Permit Renewal Period (Issued April 17, 2013);
(Permitted but not yet installed)

N - New FOG Tanks Proposed in Used Oil Permit App. Modification;
(Originally Submitted on February 19, 2015)