

**From:** [Buselli, Bradley](#)  
**To:** ["Kelly Brandenburg"](#)  
**Cc:** [Kothur, Bheem](#)  
**Subject:** CBI Jacksonville - Permit Renewal & RAI Responses  
**Date:** Wednesday, April 18, 2018 8:37:00 AM  
**Attachments:** [Page 116 from 2018 02 02\\_CBI Jacksonville - Renewal Application.pdf](#)  
[image001.png](#)

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Good Morning Kelly,

We are currently working on a draft permit for your review, and are requesting a few minor clarifications regarding the SPCC revisions as well as the attached proposed site layout (from page 116/116 PDF of the Permit Renewal Application dated February 2, 2018).

The tank table and "general specifications #2" verbiage provided on the attached Used Oil Tank Farm Plan does not match either of the tank tables sent with the permit application / RAI responses. Please clarify which information is correct, and revise either the attached site plan or update the other tank tables as appropriate.

This is the site layout we'd like to insert into the final permit documentation, which will reflect your proposed changes to the facility; ensuring it is up to date prior to the final permit issuance will negate the need to request any permit modifications later on. General conditions will be in the final permit requiring DEP notifications and the submittal of as-built documents, once construction/installation is completed; when accepted you will be authorized to use the proposed new tanks.

The revised/updated Section 7 of the SPCC that was provided with the RAI Responses includes a material table that is missing information required by 40 CFR 279.52(b)(2)(v), such as the physical description of each item on the list and a brief outline of its capabilities. The date of revision on this table is listed as January 1, 2017, whereas the date of revision on the original table submitted with Permit Renewal Application is listed February 8, 2018. The intent of comment 3c in the RAI was to ensure that the reference to the location of this equipment was correct, and a that map was provided in the application; while revisions to the table are acceptable, they are missing information. Please indicate which version of the table is correct, and provide updated documents as needed.

Please also note for future submittals, that the "Last Revised: Month xx, year" text located at the bottom of the several pages was not updated in revised sections of the SPCC (pages revised as requested in the RAI comment 3).

Please let me know if you have any questions.



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