

Thursby, Kim

From: David Hodges <DHodges@mittauer.com>
Sent: Tuesday, May 8, 2018 1:34 PM
To: Epost HWRS
Subject: Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484; Permit Minor Modification

Cc; received by permittee's engineer.

Sincerely,

DAVE HODGES
PROJECT ENGINEER
MITTAUER & ASSOCIATES, INC.
580-1 Wells Road
Orange Park, FL 32073
Office: (904) 278-0030
Direct: (904) 644-0648
Email: dhodges@mittauer.com



Thursby, Kim

From: Epost HWRS
Sent: Friday, May 4, 2018 8:18 AM
To: 'David.Tedford@puraglobe.com'
Cc: Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; McBride, Ashanti; Cinquino, Dawn; Eldredge, Susan F.; White, John; Eckoff, Michael; Kothur, Bheem
Subject: Puraglobe Florida, LLC (fka NexLube Tampa LLC); FLD 982 108 136; Closure Plan, dated April 09, 2018
Attachments: 5-4-18-Puraglobe Fla LLC-Nexlube Tampa-Closure plan review comments.Receipt.pdf

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

Noah Valenstein
Secretary

May 8, 2018

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

RE: **Permit Minor Modification: Liquid Environmental Solutions of Florida, LLC**
EPA ID Number: FLD 981 928 484
Operating Permit Numbers: 72815-019-HO; 72815-018-SO
Duval County

Dear Mr. Turovsky:

This letter is in response to your Permit Minor Modification request for the addition of two (2) 37,000-gallon tanks for Oily Water Storage, Tanks 121 and 122, and the closure and removal of Tanks 3A, 3B, 4A, and 4B as documented in Tank Closure Report dated March 13, 2018, as-built documentation for Tanks 121 and 122 dated April 6, 2018, and the Certification of Closure Completion dated April 11, 2018. Upon review of your submittal, the Department finds your request is satisfactory. Therefore, pursuant to Section 403.769, Florida Statutes (F.S.), and Chapters 62-701 and 62-710, Florida Administrative Code (F.A.C.), the Department modifies the following conditions of the permit: pages one (1) through four (4), seventeen (17), twenty-four (24) and twenty-five (25) of the current permit shall be replaced with the attached revised pages to reflect changes in the tank storage capacity and site map.


This permit modification becomes effective immediately. All other conditions of the permit remain unchanged. This letter must be attached to the existing permit and becomes part of that permit. As Permittee, you have appellate rights as set forth in the enclosed Notice of Rights.

If you have any questions, please contact Bradley Buselli by telephone at (850) 245-8989 or by email at bradley.buselli@floridadep.gov.

Issued: May 8, 2018

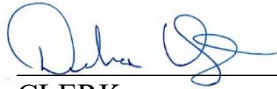
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

May 8, 2018
DATE

BB/bb
Enclosure

cc (with enclosure):

Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Brian Bastek, EPA Region 4 bastek.brian@epa.gov
Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov
Bheem Kothur, DEP Headquarters, bheem.kothur@floridadep.gov
Dawn Cinquino, DEP Headquarters, dawn.cinquino@floridadep.gov
Financial Assurance Working Group, DEP Headquarters,
Financial.Assurance.Working.Group@floridadep.gov
Pam Fellabaum, DEP Northeast District, pam.fellabaum@floridadep.gov
David Hodges, Mittauer & Associates, Inc., dhodges@mittauer.com
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 or agency.clerk@dep.state.fl.us.
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.



Florida Department of Environmental Protection

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

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

Noah Valenstein
Secretary

PERMITTEE:

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

I.D. NUMBER: FLD 981 928 484

USED OIL PERMIT NUMBER: 72815-019-HO

SOLID WASTE PERMIT NUMBER: 72815-018-SO

DATE OF ISSUE: May 8, 2018

EXPIRATION DATE: November 20, 2022

ATTENTION:

Yuri Turovsky, Plant Manager

COUNTY: Duval

PROJECT: Used Oil and Material Processing Facility

Pursuant to authorization obtained by the Florida Department of Environmental Protection (FDEP) under the Resource Conservation and Recovery Act [42 United States Code (U.S.C.) 6901, *et seq.*, commonly known as RCRA], and 40 Code of Federal Regulations 279, this permit is issued under the provisions of Section 403.722 Florida Statutes (F.S.), and Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740, 62-762, 62-777 and 62-780 Florida Administrative Code (F.A.C.). This permit modifies conditions of permit 72815-017-HO, and replaces expired permits 72815-016-HO & 72815-017-SO. The above-named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated August 18, 2017 and supplemented by additional information submitted September 25, 2017, December 5, 2017, February 9, 2018, March 13, 2018, April 6, 2018, and April 11, 2018 that are incorporated herein and collectively referred to as the "permit application." The permit application also includes any approved drawing(s), plans, and other documents that are specifically identified and incorporated by reference. The permitted units or permitted activities are specifically 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 (Facility Map) 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. 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 (5) 20-cubic yard roll-off containers and shipped to a permitted, lined solid waste landfill for disposal.

The Facility consists of seventy (70) tanks including the addition of Tanks 121 & 122 for the storage of oily water, as indicated in Attachment A. All current tanks and piping are located within secondary containment. The primary and secondary materials stored in these tanks are as listed in Attachment B of this permit. Twenty (20) tanks are dedicated to used oil (UO), fifteen (15) 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 (3) tanks are dedicated to sludge and oily water (S/OW), six (6) tanks are dedicated to fat, oil & grease (FOG), two (2) tanks are dedicated to virgin fuels, and fifteen (15) tanks are dedicated to wastewater.

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 296,566 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 two hundred (200) 55-gallon drums.

The location of former Tanks 3A, 3B, 4A, and 4B will be made available for a drum storage/handling area in place of the tanks, with additional processing units to be determined as indicated in Attachment A. The Permittee must notify the Department prior to the implementation of any additional drum storage and handling operations or new processing units.

The Permittee is required to investigate any releases of contaminants to the environment at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Pursuant to 40 CFR 260.10 [as adopted by reference in Rule 62-730.020(1), F.A.C.], and Chapter 62-780 F.A.C. corrective requirements extend to all property under control of the Permittee (see Attachment A, a map of the property boundaries of the land under the Permittee's control) and to all contamination that originated from discharges at the property under control of the Permittee.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with Rules 62-4.050 and 62-710.800 F.A.C. and potential enforcement action.

The following documents were used in the 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
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. Operating Permit dated April 17, 2013.
17. Conditional Site Rehabilitation Completion Order (SRCO) dated March 18, 2015 outlining groundwater use restrictions and controls to satisfy site rehabilitation.

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

I.D. NUMBER: FLD 981 928 484
PERMIT NUMBER: 72815-019-HO; 72815-018-SO
EXPIRATION DATE: November 20, 2022

18. Permit Renewal Application dated August 18, 2017 and supporting documentation submitted September 25, 2017.
19. DEP Request for Additional Information letter dated October 6, 2017.
20. Response to Request for Additional Information letter dated December 4, 2017.
21. Operating Permit Numbers 72815-017-HO and 72815-018-SO dated January 19, 2018.
22. Facility Permit Minor Modification Request dated February 9, 2018.
23. Closure Activities Report for Tanks 3A, 3B, 4A, and 4B dated March 13, 2018.
24. Updated Tank Table, Site Map, and As-built documentation for Tanks 121 and 122 dated April 6, 2018.
25. Certification of Closure Completion dated April 11, 2018.

- b. Deliveries: Used oil processor/re-refiners must keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:
 - (1) The name, address and EPA identification number (if applicable) of the transporter who delivers the used oil to the burner, processor/re-refiner, or disposal facility;
 - (2) The name, address and EPA identification number (if applicable) of the burner, processor/re-refinery or disposal facility who will receive the used oil;
 - (3) The quantities of used oil shipped and date of shipment; and
 - (4) The laboratory analytical results.
- c. The records described in paragraph (a) and (b) of this section must be maintained for at least three years. The records shall be kept at the permitted facility and shall be available for inspection by the Department during normal business hours.

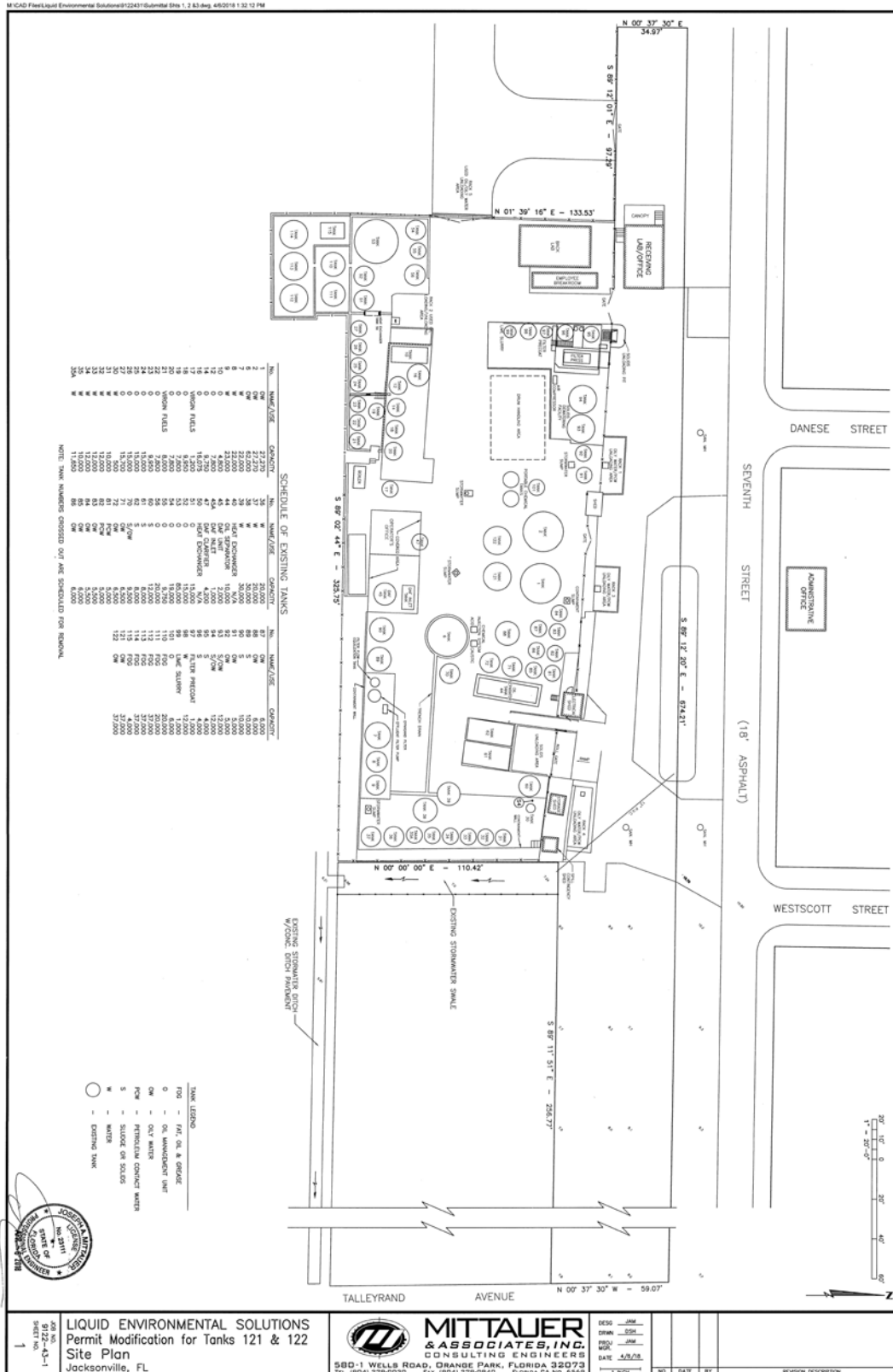
Part II Subpart C – Tank and Container Conditions

- 1. “Tank system” for the purpose of this permit, is currently defined as the storage tank(s) listed on Attachment B of this permit, along with ancillary equipment and any secondary containment structures.
- 2. Volumes of used oil should not exceed 296,566 gallons in processing at any given time (95% of 312,175 [total of all used oil tanks listed in Attachment B]). To prevent overflow, the Permittee shall notify the Department when the volume of used oil, oily wastewater or PCW stored in any of the permitted tanks exceeds 95% of the maximum storage capacity of the tank.
- 3. Labeling of tanks and containers:
 - a. Used Oil: The Permittee shall label or mark all containers and aboveground tanks, used for storage or processing of used oil, with the words “Used Oil” [Rule 62-710.401(6), F.A.C., and 40 CFR 279.54(f)].
 - b. PCW: The Permittee shall label or mark all containers or tanks which are solely used for the storage of Petroleum Contact Water with the words “Petroleum Contact Water” [Rule 62-740.100(1), F.A.C.].
- 4. The Permittee shall store wastes only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.
- 5. The Permittee shall keep containers and tanks closed or covered except when adding or removing waste in accordance with 62-710.401(6), F.A.C.
- 6. Aboveground storage and process tanks having a capacity greater than 550 gallons, and all integral piping shall comply with the performance standards for shop fabricated tanks

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

I.D. NUMBER: FLD 981 928 484
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ATTACHMENT A – FACILITY MAP



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

I.D. NUMBER: FLD 981 928 484
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ATTACHMENT B – TANK TABLE

LIQUID ENVIRONMENTAL SOLUTIONS Jacksonville, Florida TANK TABLE						
Updated 04/02/2018						
Tank	Closure Capacity	Purpose	Regulated	Regulated Capacity	Less 2% (Overflow)	Man Hours
1	27,270	OW	Yes	27,270	26,725	10
2	27,270	OW	Yes	27,270	26,725	10
6	62,000	OW	Yes	62,000	60,760	10
7	22,000	W	No			
8	22,000	W	No			
9	23,000	W	No			
10	4,800	O	Yes	4,800	4,704	10
12	7,800	O	Yes	7,800	7,644	10
14	9,750	O	Yes	9,750	9,555	10
16	16,075	O	Yes	16,075	15,754	10
17	1,200	VIRGIN FUELS	Yes			10
18	9,950	O	Yes	9,950	9,751	10
19	7,800	O	Yes	7,800	7,644	10
20	7,800	O	Yes	7,800	7,644	10
21	8,000	VIRGIN FUELS	Yes			10
22	7,800	O	Yes	7,800	7,644	10
23	9,950	O	Yes	9,950	9,751	10
24	15,000	O	Yes	15,000	14,700	10
25	15,000	O	Yes	15,000	14,700	10
26	15,000	O	Yes	15,000	14,700	10
27	15,700	O	Yes	15,700	15,386	10
30	500	W	No			
31	10,000	W	No			
32	12,000	W	No			
33	12,000	W	No			
34	12,000	W	No			
35	10,000	W	No			
35A	11,850	W	No			
36	20,000	W	No			
37	20,000	W	No			
38	30,000	W	No			
39	30,000	W	No			
51	15,000	O	Yes	15,000	14,700	10
52	15,000	O	Yes	15,000	14,700	10
53	85,000	O	Yes	85,000	83,300	10
54	19,000	O	Yes	19,000	18,620	10
55	9,750	O	Yes	9,750	9,555	10
56	20,000	O	Yes	20,000	19,600	10
60	12,000	S	Yes	12,000	11,760	10
61	8,000	S	Yes	8,000	7,840	10
62	8,000	S	Yes	8,000	7,840	10
70	9,500	S/OW	Yes	9,500	9,310	10
71	6,500	OW	Yes	6,500	6,370	10
72	6,500	OW	Yes	6,500	6,370	10
81	5,000	PCW	Yes	5,000	4,900	10
82	5,000	PCW	Yes	5,000	4,900	10
83	5,500	OW	Yes	5,500	5,390	10
84	5,500	OW	Yes	5,500	5,390	10
85	6,000	OW	Yes	6,000	5,880	10
86	6,000	OW	Yes	6,000	5,880	10
87	6,000	OW	Yes	6,000	5,880	10
88	6,000	OW	Yes	6,000	5,880	10
89	10,000	S	Yes	10,000	9,800	10
90	10,000	S	Yes	10,000	9,800	10
91	5,000	OW	Yes	5,000	4,900	10
92	5,000	OW	Yes	5,000	4,900	10
93	12,000	S/OW	Yes	12,000	11,760	10
94	12,000	S/OW	Yes	12,000	11,760	10
95	4,000	S	Yes	4,000	3,920	10
96	4,000	S	Yes	4,000	3,920	10
98	12,000	W	No			
101	6,000	O	Yes	6,000	5,880	10
110	20,000	FOG	Yes	20,000	19,600	10
111	20,000	FOG	Yes	20,000	19,600	10
112	37,000	FOG	Yes	37,000	36,260	10
113	37,000	FOG	Yes	37,000	36,260	10
114	37,000	FOG	Yes	37,000	36,260	10
115	4,000	FOG	Yes	4,000	3,920	10
121	37,000	OW	Yes	37,000	36,260	10
122	37,000	OW	Yes	37,000	36,260	10
Ancillary Equipment				815,215	798,911	
40	N/A	Heat Exchanger	N/A		N/A	
44	10,000	Oil Separator	Yes	10,000	9,800	10
45	2,000	DAF Unit	Yes	2,000	1,960	10
45A	1,000	DAF Inlet	Yes	1,000	980	10
47	4,200	DAF Clarifier	Yes	4,200	4,116	10
50	N/A	Heat Exchanger	Yes	N/A	N/A	N/A
97	1,000	Filter Press Precoat	Yes	1,000	980	10
99	1,000	Lime Slurry	No			
Totals	1,090,765			833,415	816,747	600
Tanks	74			59	59	
Tank Legend	Number of Tanks	Total Volume	Less 2%			
O	20	312,175	305,932			
FUEL	2					
OW	15	248,540	243,569			
PCW	2	10,000	9,800			
S	7	56,000	54,880			
S/OW	3	33,500	32,830			
FOG	6	155,000	224,420			
W	15					
	70	815,215	871,431			

DEP Permitted Tanks