From: Ed Kinley
To: Knauss, Elizabeth; Kothur, Bheem
Cc: Kennedy, Shannon
Subject: RE: Universal Environmental Solutions - permit
Date: Monday, May 21, 2018 12:08:41 PM
Attachments: image001.png

Beth – these frac tanks do not move from the Frac Tank Containment Pad. The contents are emptied with frequency. I'm certain that they are included in our permit. I'm also certain that they are included in our Closure Estimate.

I do acknowledge that the word "Future" does appear on one of the drawings. I think this was an Engineering oversight.

The only "future" activity would be a Solidification Operation. We discussed this with Bheem and submitted draft design information & a draft permit. We have not submitted a formal application. We have not constructed anything with regards to Solidification.

Could you or Bheem please give me a call to discuss further?

Regards,
Ed Kinley

Universal Environmental Solutions, LLC

Ed Kinley, President
(813)390-0659

From: Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>
Sent: Friday, May 18, 2018 11:00 AM
To: Kothur, Bheem <Bheem.Kothur@dep.state.fl.us>
Cc: Ed Kinley <ekinley@uestampa.com>; Kennedy, Shannon <Shannon.Kennedy@dep.state.fl.us>
Subject: Universal Environmental Solutions - permit

Bheem

Ed Kinley called me this morning to discuss the status of his last inspection report, and we discussed what is authorized under the facility's current permit. The facility/process description on page 1 says:

"The Facility currently consists of eight (8) tanks ranging in capacity from 5,000 gallons to 69,115 gallons. The primary and secondary materials stored in these tanks are as listed in Attachment B of this permit. All tanks and piping are located within secondary containment as shown in Attachment A. The facility is authorized to store and use a total of 10,000 gallons of used oil in the above ground storage tank and related appurtenances currently installed at the facility. Three (3) Tanks (Tank 6, 7, and 8) with a capacity of 5,000 gallons each are dedicated to petroleum contact water (PCW) storage and for wastewater treatment/processing. These tanks are located in the Tank Containment Pad Area"

Specific conditions I 27 & 28 say :
27. The Permittee is allowed to store used oil only in the aboveground tanks within the secondary containment, and/or within double-walled tanks as shown in Attachment - A of this permit. The permitted units and tank capacities are shown for Tanks in Attachment - B.
28. The Permittee shall not exceed the maximum storage capacities of the permitted tanks as specified in
the Operating Information section of the permit application and Attachment B of this permit

The tank and container conditions in Part III beginning on page 14 do not mention any specific container storage quantity limits or locations – it just discusses the tank system. The site map (Figure 1) lists the frac tank containment area as "future". Attachment B – the containment pad capacity calculations does not include the frac tank containment pad. The frac tanks at the facility would probably qualify as containers, provided they are not kept in the containment more than 180 days. If they are kept there longer, they would become regulated as ASTs under the storage tanks program.

Ed – how often do you move or change out the frac tanks?

Bheem – Ed is concerned because he thought that the frac tank expansion area was covered under the current permit. He pointed out sections of the application where the area is discussed. These include sections in Revision 2

Page 108 (pg 143 of the pdf in Oculus) – describes the loading and unloading area containment to be constructed in March 2015, with 4 frac tanks. The containment capacity calculations are on pg 110. There is additional screening equipment and pumps in the area not described in the application.

Page 133 – (pg 168 in the pdf in Oculus) 9.4.2 – Tank Table – includes the 4 frac tanks as holding

bilge oily water. However this description is not consistent with the current use.

Pg 149 (pg 184 of the pdf) includes the frac tanks and containment pad and the pipeline area within the closure plan. However, looking at Page 156 (pg 191 of the pdf) I did not see a closure cost estimate for removal of the waste or decontamination of the frac tanks.

What do you think should be the next step?

Elizabeth Knauss
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Southwest District
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