From: Kothur, Bheem
To: Knauss, Elizabeth; Morgan, Steve
Cc: Baker, Bryan; Cinquino, Dawn; Kothur, Bheem; Eldredge, Susan F.
Subject: RE: Universal Environmental Solutions
Date: Thursday, April 26, 2018 9:24:58 AM

Hi Beth and Steve:
No, they have not submitted the permit modification to include any solid waste activities at the site.

Also, frac tanks are new news to me.

Yes, please gohead and ask to submit the permit modification application to include the solid waste permit conditions ASAP.

Also, it is better to have conference call to discuss the pre-application submittal.

Please let me know, if you need any additional inform from us.
Thanks,

Bheem

From: Knauss, Elizabeth
Sent: Wednesday, April 25, 2018 3:53 PM
To: Kothur, Bheem <Bheem.Kothur@dep.state.fl.us>
Cc: Morgan, Steve <Steve.Morgan@dep.state.fl.us>
Subject: Universal Environmental Solutions

Bheem – did UES ever submit an application to modify their permit to add solid waste processing conditions?

From what I can see, the facility has constructed and is already using the containment in the area designated "frac tank containment area (future)" in Attachment A. Further, a frac tank with oi was parked in the leachate only unloading area on the map. This has since been emptied and moved. They have added some processing equipment (screen filter boxes) in the unloading area, and Tank 10 is no longer being used for used oil – however the four frac tanks in the containment are all holding oil or oily water.

As far as I can see, the frac tank containment was never permitted – I don't see any drawings or containment calculations for it. The extra capacity is not included in the facility's financial assurance or SPCC plan.

I will be asking them to submit a permit mod.

Elizabeth Knauss
Environmental Consultant
Southwest District

Florida Department of Environmental Protection
813/470-5902