

Thursby, Kim

From: Ed Kinley <ekinley@uestampa.com>
Sent: Thursday, January 3, 2019 4:05 PM
To: Kothur, Bheem
Cc: Thursby, Kim
Subject: RE: Universal Environmental Solutions, LLC – Tampa; FLR 000 199 802;First Request for Additional Information (RAI)

Hello Bheem. We have received and are working on our reply. Is this response acceptable via email or does it require going into the DEP business portal to confirm?

Regards,
EK



Ed Kinley, President
(813)390-0659

From: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Sent: Thursday, January 3, 2019 3:41 PM
To: Ed Kinley <ekinley@uestampa.com>
Cc: Thursby, Kim <Kim.Thursby@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: FW: Universal Environmental Solutions, LLC – Tampa; FLR 000 199 802;First Request for Additional Information (RAI)

Hello Ed,

Please to the Epost that you have received on December 18, 2018, ASAP.
Thanks,

Bheem

From: Thursby, Kim
Sent: Tuesday, December 18, 2018 11:11 AM
To: 'ekinley@uestampa.com' <ekinley@uestampa.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>; Ashwood, Janet <Janet.Ashwood@dep.state.fl.us>; Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Financial Assurance Working

Group <Financial.Assurance.Working.Group@dep.state.fl.us>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; 'jimseavy@seavyassociates.com' <jimseavy@seavyassociates.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Subject: Universal Environmental Solutions, LLC – Tampa; FLR 000 199 802; First Request for Additional Information (RAI)

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

REQUEST FOR ADDITIONAL INFORMATION

December 18, 2018

Mr. Ed Kinley, President
1650 Hemlock St.
Tampa, Florida 33605
ekinley@uestampa.com

Re: First Request for Additional Information (RAI)
Hillsborough County – Hazardous Waste
Facility Name: Universal Environmental Solutions, LLC – Tampa
Facility ID: FLR 000 199 802
Current Permit Number: 330300-001-HO
DEP Application Number: 330300-002-HO

Dear Mr. Kinley:

Thank you for your Used Oil Processing Permit Major Modification application for the above referenced Facility. The Department has assigned DEP Application No. 330300-002-HO to the application. A Department staff review of the application and supporting documentation dated November 1, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, January 17, 2019 unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

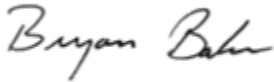
Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to bheem.kothur@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to

Mr. Ed Kinley, President
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bheem.kothur@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at 850-245-8781 or by e-mail at bheem.kothur@floridadep.gov.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G., Administrator
Hazardous Waste Program and Permitting

Attached: List of Requested Information

cc (w. Attachments):

Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov

Bradley Buselli, DEP Headquarters, bradley.buselli@floridadep.gov

Janet Ashwood, DEP Headquarters, janetashwood@floridadep.gov

Elizabeth Knauss, DEP Southwest District, elizabeth.knauss@floridadep.gov

Financial Assurance Working Group, DEP Headquarters,

financial.assurance.working.group@floridadep.gov

Shannon Kennedy, DEP Southwest District, Shannon.kennedy@floridadep.gov

Jim Seavy, Seavy & associates, jimseavy@seavyassociates.com

Attachment: List of Requested Information

Facility Name: Universal Environmental Solutions, LLC – Tampa

Facility ID: FLR 000 199 802

Current Permit Number: 330300-001-HO

DEP Application Number: 330300-002-HO

Review Comments: The modification application has been reviewed with respect to the applicable requirements in 62-710.800, F.A.C.; comments are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. **Application, DEP Form 62-710.901(6),**
 - a. **Part II, Page 7 of 8, Land Owner Certification:** It is the Department's understanding that the current land owner is Hendry Holdings, as indicated in the DEP Form 8700-12FL (Item #8, Page 1 of 5) and Part I.A of the Modification Application (Item #13, Page 2 of 8). The current Land Owner Certification form is not signed by the land owner. If Ed Kinley is an authorized representative, please attach a letter of authorization; if not, please resubmit this page of the application with the current land owner's signature.
 - b. **Part II, Page 8 of 8, P.E. Certification, Item #2, Tank Numbers:** This item indicates there are 27 total tanks, 16 of which are noted as "Oil Bearing." The DEP Form 8700-12FL (Item #13, Page 3 of 5) and other parts of the Modification Application also indicate that PCW Recovery and Transport activities are performed on site as well as stored in several tanks. Please provide clarification regarding omission of these tanks from the Tank Numbers item description on the P.E. Certification form. Revision / resubmittal of this form is not required. Also, please verify if there are any PCW designated tanks at the facility? If not review and revise the documents as appropriate.
2. **Attachment 8, Contingency Plan / SPCC Plan:** Pages 100, 125, and 126 within this attachment are missing the P.E. Certification and management approval signature from Universal Environmental Solutions, LLC, as applicable. The Department acknowledges that these certifications / signatures are provided on Page 112 of this attachment, however these forms must be completed and resubmitted.
3. **Attachment 10, Closure Plan, Table 10.2-1, Waste Management Unit Information (Page 173):** This table indicates that there are four (4) "21,000 Gal Frac Tanks;" however, these tanks are identified elsewhere in the Modification Application as 20,000 gallons each. Please provide clarification and revision as appropriate throughout the document.
4. **Attachment 11, Employee Training Plan, Revision 3, and Page 192:** The Training plan in this attachment seems to be specific to SPCC requirements, and does not address the Used oil Rule 62-710, training. Additional annual training is needed for employees involved in transporting used oil. Also, DEP recommend that the training

Mr. Ed Kinley, President
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plan include specifics on the tank and container management, labeling and recordkeeping.