



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

Sent via email only (ekinley@uestampa.com)

Mr. Ed Kinley, President
Universal Environmental Solutions, LLC
1650 Hemlock Street
Tampa, Florida 33605

Subject: Alternative Procedure Approval Order: AP-1180
Alternative Procedures & Requirements
Universal Environmental Solutions
1650 Hemlock Street, Tampa, Florida 33605
FDEP Facility Number: 29/ 9814309

Dear Mr. Kinley:

The District and Business Support Program (DBSP) has concluded its review of the alternate procedure AP-1180 (dated July 10, 2018, received July 27, 2018) and the supplemental information with the Professional Engineer's evaluations (received through October 15, 2018). AP-1180 and the supplemental information are enclosed in Exhibit A. The request is to allow storage of "processed used oil" in a portable 20,000-gallon tank (Tank #4) on the Universal Environmental Solutions' (UES) frac tank containment pad and to allow formal registration of this tank.

Per Exhibit A, UES is limited by space and financial resources to utilize any other tank storage method. The subject tank was constructed new in 2013. It was procured by UES as a cost saving measure from an equipment auction. The tank's integrity reports and engineering evaluations, certifying that the referenced tank's integrity and its placement in the secondary containment provide an equivalent degree of protection for the lands, surface waters, or groundwaters of the State of Florida. The DBSP concurs with the applicant's conclusions that the described arrangement provides an equivalent degree of protection for the lands, surface waters, or groundwaters of the State of Florida.

The Department's Order shall become final unless a timely petition for an administrative hearing is filed under sections 120.569 and 120.57, Florida Statutes (F.S.), within 21 days of receipt of this Order. Persons who have filed such a petition may seek to mediate the dispute and choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning a hearing and pursuing mediation are set forth below.

Persons affected by this Order have the following options:

- A. If you choose to accept the Department's decision regarding the Order, you do not have to do anything. This Order is final and effective as of the clerked date on the page 6 of this Order.
- B. If you choose to challenge the decision, you may do the following:
 - 1. File a request for an extension of time to file a petition for hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order. This request should be made if you wish to meet with the Department in an attempt to resolve any disputes without first filing a petition for hearing or negotiate an agreement to mediate; or
 - 2. File a petition for administrative hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order.
 - 3. In addition to requesting an administrative hearing, any petitioner may elect to pursue mediation under Section 120.573, F.S., and must negotiate an agreement to mediate within 10 days after the deadline for filing a petition.

How to Request an Extension of Time to File a Petition for Hearing

For good cause shown, pursuant to Rule 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) by the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from the applicant, shall mail a copy of the request to the applicant at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from the applicant shall mail a copy of the petition to the applicant at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Subsection 120.569(2), F.S., and Rule 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information.

- a) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, the site owner's name and address, if different from the petitioner, the DEP facility number, and the name and address of the facility;
- b) A statement of when and how the petitioner received notice of the Department's action or proposed action;
- c) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
- d) A statement of the disputed issues of material fact, or a statement that there are no disputed facts;
- e) A concise statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- f) A statement of the specific rules or statutes the petitioner contends requires reversal or modification of the Department's action or proposed action; and
- g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

How to Pursue Mediation

In addition to requesting an administrative hearing, any petitioner may elect to pursue mediation. The election may be accomplished by filing with the Department a mediation agreement with all parties to the proceeding (i.e., the applicant, the Department, and any person who has filed a timely and sufficient petition for hearing). The agreement must contain all the information required by Rule 28-106.404, F.A.C. The agreement, signed by all parties, must be received by the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000 within 10 days after the deadline for filing a petition, as set forth above. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement.

Pursuant to Rule 28-106.404, F.A.C., an agreement to mediate must include the following:

- (i) The name, address, and telephone number of the persons who may attend the mediation, (also the DEP facility number, the name and address of the facility if applicable);
- (ii) The name, address, and telephone number of the mediator agreed to by the parties;
- (iii) How the costs and fees associated with the mediation will be allocated (the Department will not pay any of the costs of mediation);
- (iv) The agreement of the parties regarding the confidentiality of discussions and documents introduced during mediation to the extent authorized by law;
- (v) The date, time, and place of the first mediation session;

- (vi) The name of the party's representative who shall have authority to settle or recommend settlement; and
- (vii) The signature of the parties.

As provided in Section 120.573, F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57, F.S., for holding an administrative hearing and issuing a final order. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons seeking to protect their substantial interests that would be affected by such a modified final decision must file their petitions within 21 days of receipt of this notice, or they shall be deemed to have waived their right to a proceeding under Sections 120.569 and 120.57, F.S. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57, F.S., are resumed.

This Order is final and effective as of the date that it is clerked and filed (see page 5). Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or mediation settlement.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Agency Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within thirty days after this order is filed with the clerk of the Department (see page 5 below).

Mr. Ed Kinley

AP-1180

Page 5

Questions

Any questions regarding the Department's review of your alternate procedure should be directed to Elena Compton at 850-245-8911. Questions regarding legal issues should be referred to Rebecca Robinette, Office of General Counsel, at 850-245-2278. Contact with any of the above does not constitute a petition for administrative hearing, a request for a time extension to file a petition for hearing or an agreement to mediate.

Sincerely,

Tim J. Bahr

Digitally signed by

Tim J. Bahr

Date: 2018.11.09

08:23:25 -05'00'

Tim J. Bahr, P.G., Acting Director
Division of Waste Management

TJB/ec

Enclosed: Exhibit A Petition for Alternate Procedure Request

ec: J Laurel Culbreth - FDEP Southwest District - Laurel.Culbreth@floridadep.gov
Elena Compton, P.E. – FDEP DBSP – Elena.Compton@floridadep.gov

FILING AND ACKNOWLEDGMENT:

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Tamela Sterling
Clerk

11/9/18
Date



Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form: 62-762.901(4)

Form Title: Alternative Procedure Form

Effective Date: January 2017

Incorporated in Rule 62-762.851, F.A.C.

Alternative Procedure Form

Print or type, fill out completely and attach additional sheets for multiple facilities

Section 1

Facility ID #: FLR000199802 County: Hillsborough

Facility Name: Universal Environmental Solutions, LLC

Facility Location: 1650 Hemlock Street (Building #2) / Tampa, FL. 33605

Section 2

Applicant's Name: Ed Kinley

Address: Physical: 1650 Hemlock Street / Tampa, FL. 33605 Mail: P.O. Box # 76105 / Tampa, FL. 33675

Applicant's Telephone Number: (813) 241 - 9206 X 301

Section 3

Rule citation within Chapter 62-761 or 62-762, F.A.C., that an Alternative Procedure is being requested for:

Permanent storage of processed "used oil" in a portable 20,000 Gallon Frac Tank.

Difference between Chapter 62-761 or 62-762, F.A.C., requirement and Alternative Procedure Request:

Requesting to store processed "used oil" in a portable 20,000 gallon Frac Tank (Identified as Tank #4) on the UES Frac Tank Containment Pad. Requesting formal registration of this tank.

Please write a brief description of proposed Alternative Procedure. (If you need additional space, please attach a separate sheet):

UES is limited by space and financial resources to utilize any other tank storage method. The subject tank was constructed new in 2013. It was procured by UES as a cost saving measure from an equipment auction. We have attached a tank integrity test report. The tank is within concrete containment and the containment drawing "As - Built" will be provided soon from a Florida licensed Professional Engineer.

Section 4

Please provide a brief demonstration of how the proposed Alternative Procedure provides a substantially equivalent degree of protection for the lands, surface waters, or groundwaters of the State versus established requirements. (If you need additional space, please attach a separate sheet).

We have attached a tank integrity test report. The tank is within concrete containment and the containment drawing "As - Built" will be provided soon from a Florida licensed Professional Engineer. Containment requirements are acknowledged, as required, to be 110% = 22,000 gallons. A collection sump captures storm water or other residual oily waters and directs the liquid into the UES pre-treatment facility. Electric pump has a float switch in the sump.

Section 5

ED KINLEY
Applicant's Name (Print or Type)

E. Kinley
Applicant's Signature

07/10/18
Date

Document Information: Provide supporting documents including this form via email to Tanknotify@dep.state.fl.us, or documents can be sent to:
Florida Department of Environmental Protection, Division of Waste Management, 2600 Blair Stone Road, MS 4560, Tallahassee, FL 32399

AP Number AP-1180
(For DEP Use Only)

TECHNICAL REPORT

Date	:	06 Sep 2018
Author	:	STH
Revision	:	---
Report	:	18553.01.0630.01

UNIVERSAL ENVIRONMENTAL SOLUTIONS, LLC

INSPECTION AND TESTING OF FRAC TANK No. 4

KNUD E. HANSEN USA
NAVAL ARCHITECTS • DESIGNERS • MARINE ENGINEERS

1650 SE 17TH STREET, SUITE 212 • FORT LAUDERDALE, FLORIDA 33316
PHONE: (954) 541-3963 • E-MAIL: KEH@KEH-US.COM • WEB: WWW.KEH-US.COM



TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date : 06 Sep 2018
Author : STH
Revision : ---
Report : 18553.01.0630.01

Universal Environmental Solutions, LLC

Address : 1650 Hemlock Street
Tampa, Florida 33605

Contact Person : Ed Kinley
Phone : (813) 241-9206
Mobile : (813) 390-0659
E-mail : ekinley@uestampa.com


KNUD E. HANSEN USA

Author : Steve Hancock

Checked by : Peter Johansson

Contact Person : Steve Hancock
Senior Naval Architect & Marine Engineer
Phone : (954) 541-3963
Mobile : (954) 257-2286
E-mail : sth@keh-us.com

Signed and Sealed By:


Wesley L. Scott, P.E.
Licensed Professional Engineer
Florida License No. 41197
Date: 07 SEP 2018

Summary:

This report provides the results of the inspection and testing of Frac Tank No. 4 at the UES Pre-treatment Wastewater Facility in Tampa, Florida.

Document Classification:

Commercial in Confidence

Document History:

Document Number				Name of Document
KEH 18553.01.0630.01				Inspection and Testing of Frac Tank No. 4
	06 Sep 2018	STH	PEJ	Original Issue
Rev.	Date	Orig	Chkd	Remarks

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TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date	: 06 Sep 2018
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1 INTRODUCTION

Universal Environmental Solutions, LLC ("UES") tasked Knud E. Hansen USA Inc. ("KEH") to perform the inspection and testing of Frac Tank No. 4 at the UES Pre-treatment Wastewater Facility in Tampa, Florida. The inspection and testing was performed on 05 September 2018 by Steve Hancock and Wesley Scott P.E. of KEH; this report summarizes the findings of the inspection.

2 GENERAL DESCRIPTION

Frac Tank No. 4 is located at the UES Pre-treatment Wastewater Facility in Tampa, Florida. It is sited on a heavy concrete pad designated as the UES Truck Receiving and Outbound Oil Containment Area. Frac Tank No. 4 is the southernmost of the frac tanks in this location and is used solely for storage of oil recovered during the treatment process.

Frac Tank No. 4 was constructed by Hohenwald Fabrication of Hohenwald, Tennessee in November 2013. It is a single skin tank of welded steel construction built for highway use and has a capacity of 20,000 gallons. Approximate overall dimensions are 50'-0" long x 8'-6" wide x 11'-0" tall. The tank has a cylindrical bottom, flat vertical sides, and flat vertical ends with recesses as needed for walkways and accesses. All framing is external to the tank.

3 EXTERNAL INSPECTION

The external steel surfaces of the frac tank were visually inspected for deformation, deterioration, and physical damage, and other deficiencies. All steel elements were found to be in excellent condition with minimal pitting, visually acceptable weld quality, and original intact protective coatings. No visible deficiencies were found.

4 INTERNAL INSPECTION

The frac tank was emptied, cleaned, and certified safe for entry prior to entry for inspection by KEH personnel. The interior of the tank was found to be clean and smooth with no evidence of pitting or loss of material and visually acceptable weld quality. There was some minor loss of the original interior coating, though this is not an issue given the tank's usage. No visible deficiencies were found.

5 ACCESS AND PIPING INSPECTION

The accesses and piping connections were found to be in excellent condition with no visible signs of deterioration. Access gaskets were in good condition and well secured, and all drop-bolt dogs were in good condition and easily operated. Connection flanges for piping were found to be in good condition. No visible deficiencies were found.

Inspection of hoses and piping external to the frac tank was not performed and is beyond the scope of this report.

6 ULTRASONIC INSPECTION

An ultrasonic thickness survey of the tank structure was performed by the Q-Sea Corporation of Tampa, Florida ("Q-Sea") on 12 July 2018. The gaugings performed were reviewed by KEH and were found to show little if any reduction of material thickness, which is to be expected in a tank only five years old.

No unacceptable gaugings or areas of concern were noted by Q-Sea.

7 RUNNING GEAR AND WALKWAY INSPECTION

Inspection of the tires, axles, tail lights, braking system, trailer connection, associated wiring, and other associated components were beyond the scope of this report. Operational tests were not performed, but no obvious visible deficiencies were noted.

Inspection of the walkway, hand rails, fixed ladder, and folding access ladder were beyond the scope of this report. No obvious visible deficiencies were noted.

8 HYDROSTATIC TESTING

Upon completion of internal and external visual inspections, the tank accesses were closed and the tank was filled with fresh water and hydrostatically tested for a period of one hour. The tank structure was then checked for distortion and the tank boundaries and welds were inspected for leakage. Accesses and piping connections were also checked for tightness and distortion. No visible deficiencies were found.

9 CONCLUSIONS

Based on the visual inspection performed by KEH, the ultrasonic testing performed by Q-Sea, the age of the unit, and the results of the hydrostatic test, it was found that Frac Tank No. 4 was in excellent condition and fit for its intended service.

APPENDIX A

MANUFACTURER'S DATA PLATE

TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date : 06 Sep 2018
Author : STH
Revision : ---
Report : 18553.01.0630.01



MANUFACTURER'S DATA PLATE



LOCATION OF MANUFACTURER'S DATA PLATE

APPENDIX B

EXTERIOR OF TANK

TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

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LEFT SIDE PLATING & FRAMING



ACCESS HATCH AND REAR FACE

TECHNICAL REPORT

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RIGHT SIDE PLATING & FRAMING



RIGHT SIDE TIRES AND ACCESS HATCH

TECHNICAL REPORT

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UES Frac Tank No.4

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Author : STH

Revision : ---

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RIGHT SIDE PLATING & FRAMING



BLANKED FILL / DISCHARGE VALVE

TECHNICAL REPORT

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FRONT FACE AND RIGHT SIDE WALKWAY



REAR OF RIGHT SIDE WALKWAY RECESS

TECHNICAL REPORT

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FRONT PORTION OF TOP OF TANK AND WALKWAY



REAR HALF OF TOP OF TANK AND ACCESS HATCH

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Inspection and Testing of
UES Frac Tank No.4

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TYPICAL ACCESS HATCH



TYPICAL BRACING FOR TANK BOTTOM & SKID

APPENDIX C

INTERIOR OF TANK

TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

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OVERALL VIEW LOOKING TO REAR OF TANK



OVERALL VIEW LOOKING TO FRONT OF TANK

TECHNICAL REPORT

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UES Frac Tank No.4

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INSTALLATION OF ACCESS HATCH AT FRONT FACE



MINOR LOSS OF COATING ON BOTTOM

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COATING ON BOTTOM



MINOR LOSS OF COATING ON LEFT SIDE

TECHNICAL REPORT

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HANGERS FOR REMOVED PIPING AND CLOSE UP OF COATING



COATING ON TOP PLATING

TECHNICAL REPORT

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UES Frac Tank No.4

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COATING ON SIDE OF WALKWAY RECESS



COATING ON BOTTOM OF WALKWAY RECESS

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UES Frac Tank No.4

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COATING ON LEFT WALL



COATING AT REAR OF TANK

TECHNICAL REPORT

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UES Frac Tank No.4

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Revision : ---

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OVERALL VIEW OF TANK

TECHNICAL REPORT

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UES Frac Tank No.4

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APPENDIX D

Q-SEA GAUGING REPORT

TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date	: 06 Sep 2018
Author	: STH
Revision	: ---
Report	: 18553.01.0630.01



UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

06/12/2018

ABS Americas 18-NO3495436-A, 18-NO3495436-B, 18-NO3495436-C
Lloyd's Register MNDE/2016/7518 * Det Norske Veritas-GL AOSS0000D1W
Bureau Veritas MIA0/CAD/20160920085602 * Class NK 17TZ041

1500 4th Street, Suite A, Harvey, Louisiana 70058 * Phone (504) 368-8762 * Fax (504) 368-8764
5275 Causeway Blvd, Suite 2, Tampa, Florida 33619 * Phone (813) 740-1800 * Fax (813) 740-1888



TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date : 06 Sep 2018
Author : STH
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INDEX

UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

FORM	DESCRIPTION	PAGE NO.
GP	GENERAL PARTICULARS	GP
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	ON SITE CALIBRATIONS	
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QSEA DRAW	PLATING & FRAMING	2
TM6A	PLATING & FRAMING	3
TM6	PLATING	4
	FWD AND AFT ENDS	
	PORT AND STBD. SIDES	
	PORT AND STBD. SIDES	
	TOP OF TANK	



TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date : 06 Sep 2018
Author : STH
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THICKNESS MEASUREMENT REPORT GENERAL PARTICULARS

Vessel Name: UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

Classification Society: AMERICAN BUREAU OF SHIPPING

Name of Company performing thickness measurements: Q-SEA CORPORATION
Thickness measurement company certified by: AMERICAN BUREAU OF SHIPPING
Certificate No.: 18-NO3495436-A, 18-NO3495436-B,
18-NO3495436-C
Certificate valid from: 05/09/2018 to: 01/06/2021
Place of measurement: UES YARD TAMPA, FL
First date of measurement: 06/12/2018
Last date of measurement: 06/12/2018
Special survey/intermediate survey due: OWNER'S REPORT
Details of measurement equipment: CYGNUS 2+ S/N 21552
CALIBRATION STD S/N 06-2076

Qualification of operator: L-II TECHNICIAN

Q-SEA Report No. TPA-00180 consisting of 4 Sheets

Name of operator: MR. J. POLITTE

Signature of operator:
Operator Official Stamp:



TMGP

TECHNICAL REPORT

Inspection and Testing of
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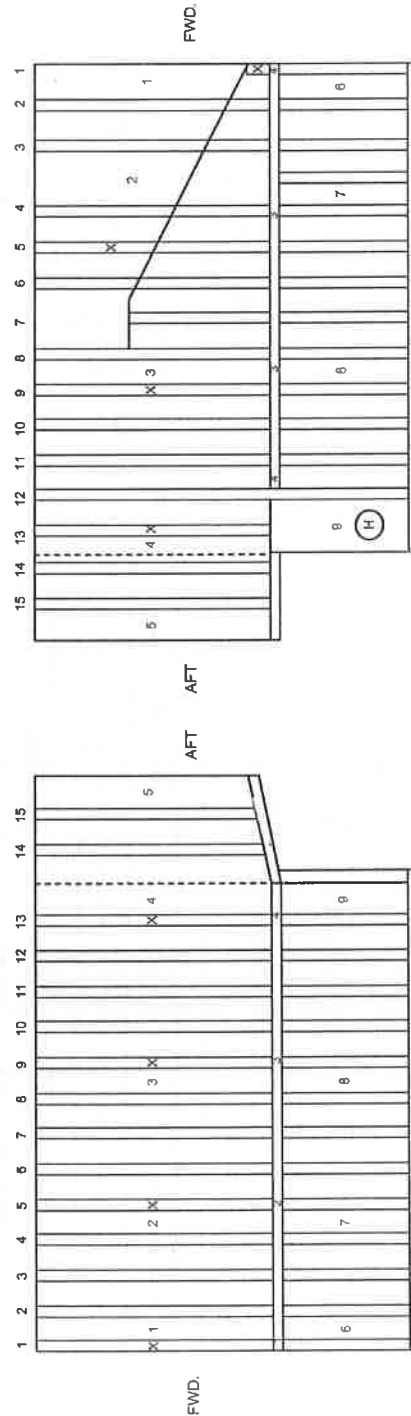
QSEA DRAW

Q-SEA CORPORATION NON DESTRUCTIVE TESTING SERVICES

Vessel Name: **UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)** Date: **06/12/2018**
Structural Member: **PLATING & FRAMING** Location of Structure: **PORT AND STBD. SIDES**

PORT SIDE
LOOKING INBD.

STBD. SIDE
LOOKING INBD.



(H) HATCH

TECHNICAL REPORT

Inspection and Testing of
UES Frac Tank No.4

Date : 06 Sep 2018
Author : STH
Revision : ---
Report : 18553.01.0630.01

Report on THICKNESS MEASUREMENT OF MISCELLANEOUS PLATE

TAGA

YPA-00180

Report No.

Class Identity No.

UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

Vessel Name:

STRUCTURAL MEMBER:		PLATING & FRAMING									
LOCATION OF STRUCTURE:		PORT AND STBD. SIDES									
DESCRIPTION	POS	Org. Thk.	Maximum Allowable Diminution		Gauged		Diminution P		Diminution S		DESCRIPTION
			In	%	Port	Stbd	In	%	In	%	
PLATE	1	250	.063	25%	252	246			.004	1.6	
	2	250	.063	25%	256	246			.004	1.6	
	3	250	.063	25%	252	246			.004	1.6	
	4	250	.063	25%	252	248			.002	0.8	
	5	250	.063	25%	246	250	.004	1.6			
	6	250	.063	25%	262	264					
	7	250	.063	25%	264	268					
	8	250	.063	25%	264	266					
	9	250	.063	25%	264	244			.008	2.4	
VERTICAL STIFFENER	NO. 1	.188	.047	25%	174	174	.014	7.4	.014	7.4	
	5	.188	.047	25%	178	176	.010	5.3	.012	6.4	
	9	.188	.047	25%	176	172	.012	6.4	.018	8.5	
	13	.188	.047	25%	178	178	.010	5.3	.012	6.4	
HORIZONTAL STIFFENER	NO. 1	.188	.047	25%	178	184	.010	5.3	.004	2.1	
	2	.188	.047	25%	176	176	.012	6.4	.012	6.4	
	3	.188	.047	25%	176	178	.012	6.4	.010	5.3	
	4	.188	.047	25%	188	180			.008	4.3	

Surveyor

MR. J. POLITTE
Q-SEA CORPORATION
06/12/2018

Operator

STATE OF FLORIDA STORAGE TANK CERTIFICATE OF INSURANCE

Reference: 40 CFR 280.97(b)(2)

Insurer or Risk Retention Group:

ACE American Insurance Company, (herein referred to as "Insurer"),
[Name of Insurer or Risk Retention Group]
c/o CHUBB Environmental Risk, P.O. Box 1000, 436 Walnut Street WA07A, Philadelphia PA 19106
[Business address of Insurer or Risk Retention Group]

"Insurer" is a(n) Insurer.
[Enter "insurer" or "risk retention group"]

Insured:

Universal Environmental Solutions, LLC
[Name of owner or operator]

P.O. Box 7-6105, Tampa, FL 33675
[Business address of owner or operator]

Policy Number: G24815894 003 **Endorsement Number:** N/A [If applicable]

Period of Coverage: 01/29/2018 – 01/29/2019 [Current policy period] **Policy Effective Date:** 01/29/2018

Covered Locations:

[List for each facility covered: the FDEP identification number and the name and site address of the facility where tanks assured by this instrument are located and the number of tanks at that site. If separate mechanisms or combinations of mechanisms are being used to assure any of the tanks at this facility, list each tank assured by this instrument by the tank identification number provided in the notification submitted pursuant to Rules 62-761.400 and 62-762.401, F.A.C. If coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location.]

See Attached.

FDEP FacID	Facility Name and Site Address	Number of Tanks or Tank I.D. Nos.
STFV01562-08	1650 Hemlock St 1650 Hemlock St Tampa, Florida 33605	4 ASTs

Certification:

1. "Insurer" hereby certifies that it has issued to the Insured the liability insurance identified above to provide financial assurance for corrective action and compensating third parties for bodily injury and property damage caused by [Insert "corrective action" and/or "compensating third parties for bodily injury and property damage"] accidental releases in accordance with and subject to the limits of [Insert "sudden accidental releases" or "nonsudden accidental releases" or accidental "releases"] liability, exclusions, conditions, and other terms of the policy arising from operating the facilities/tanks identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 280.97(b), as adopted by reference in Rule(s) 62-761.420 and/or 62-762.421, Florida Administrative Code (F.A.C.) for the above specified financial assurance. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

The limits of liability are:

Each Occurrence: \$1,000,000

Annual Aggregate: \$1,000,000

[If the amount of coverage is different for different types of coverage or for different storage tanks or locations, indicate on the facility list above or by separate attachment the amount of coverage for each type of coverage and/or for each storage tank or location.]

exclusive of legal defense costs, which are subject to a separate limit under the policy.

2. "Insurer" further certifies the following with respect to this policy:

- a. Bankruptcy or insolvency of the insured shall not relieve "Insurer" of its obligations under the policy to which this certificate applies.
- b. "Insurer" is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the insured for any such payment made by "Insurer". This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102 and 280.104 - 280.107.
- c. Whenever requested by the Florida Department of Environmental Protection (FDEP) Secretary or the Secretary's designee ("designee"), "Insurer" agrees to furnish, to the FDEP Secretary or designee, a signed duplicate original of the policy and all endorsements.
- d. Cancellation or any other termination of the insurance by "Insurer" except for non-payment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured. Cancellation for non-payment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of 10 days after a copy of such written notice is received by the insured.

☐

X Check this box if the following paragraph, for claims-made policies, applies

- e. The insurance covers claims otherwise covered by the policy that are reported to "Insurer" within six months of the effective date of cancellation or non-renewal of the policy except where the new or renewed policy has the same retroactive date or a retroactive date earlier than that of the prior policy, and which arise out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.

The person whose signature appears below hereby certifies that the wording of this instrument is identical to the wording as adopted and incorporated by reference in subsection(s) 62-761.420(4) and/or 62-762.421(4), F.A.C., and that "Insurer" is

licensed to transact the business of insurance in Florida

[Insert "licensed to transact the business of insurance" or "eligible to provide insurance as an excess or surplus lines insurer in Florida"]



JOHN J. LUPICA, President

[Signature of Authorized Representative of Insurer]

John J. Lupica, President

[Name and Title]

436 Walnut Street, Philadelphia, PA 19106


[Address]

(215) 640-1000

[Telephone Number]

tanksafepolicychange@chubb.com

[Email Address]



[Signature of Witness or Notary]

William P. Hazelton

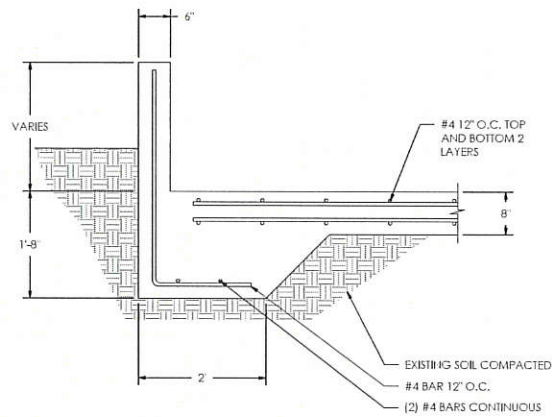
[Printed Name of Witness or include Notary Seal]

Embossed seal of "Insurer" must be included.



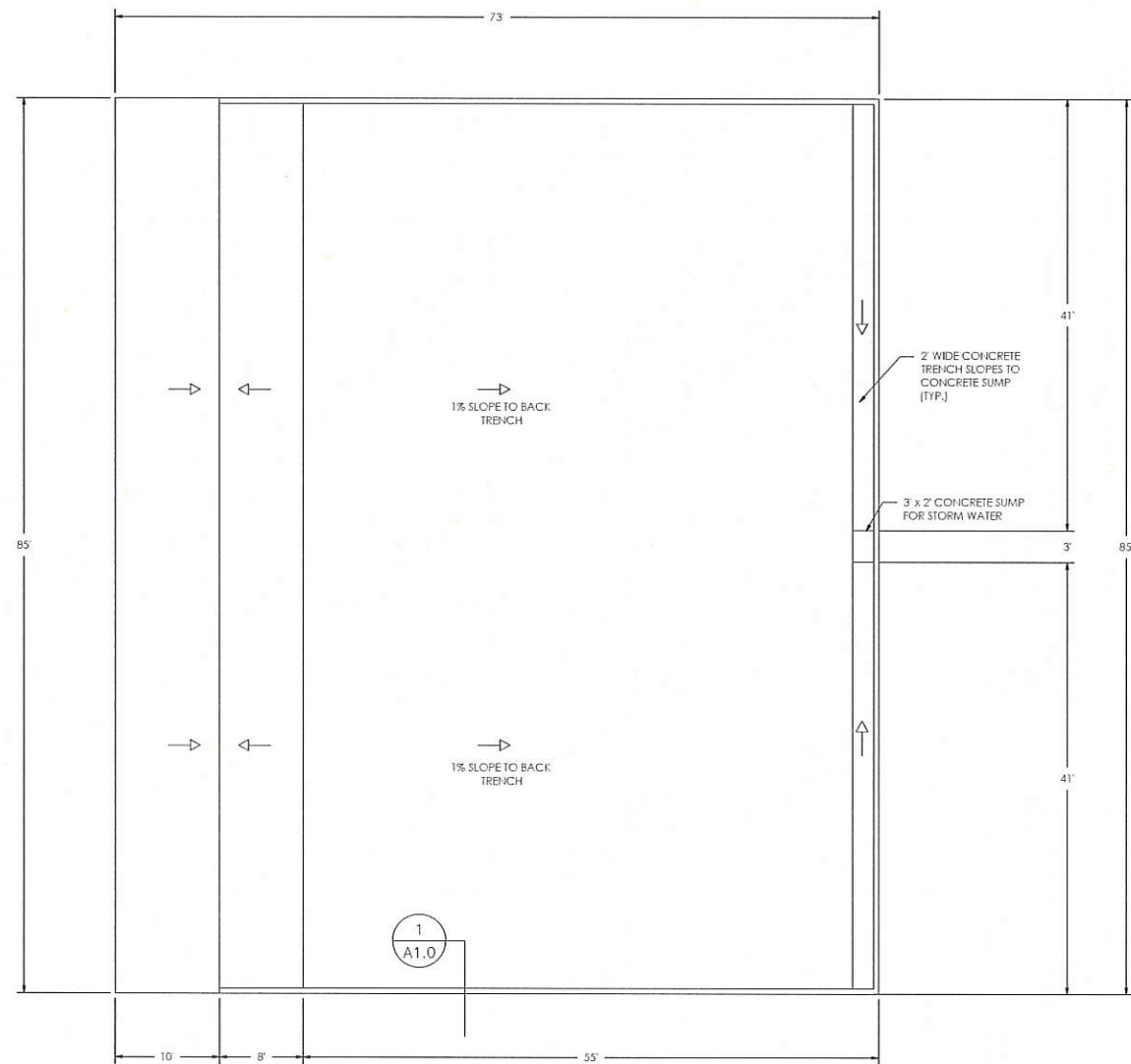
06/29/2018

[Date of Witness or Notary]

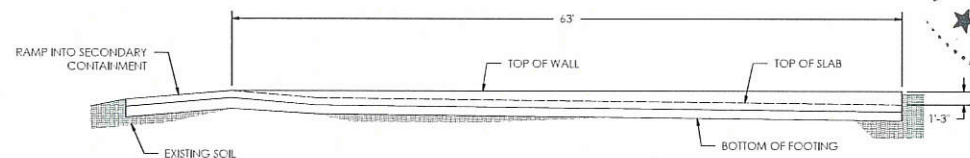


1 WALL SECTION
A1.0 SCALE: 3/4" = 1'-0"

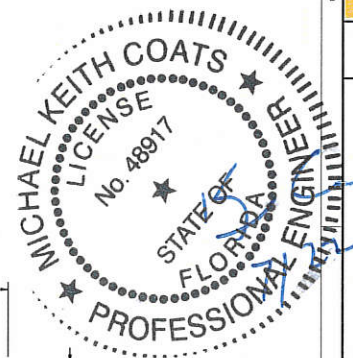
Total Storage Volume - 35,875 gallons
Control joints cut no more than 12 ft. x 12 ft. to prevent uncontrolled cracking
Control joints filled with PolySpec Thiokol 2225M NSF approved chemical resistant elastomeric joint sealant



PLAN VIEW
SCALE: 1/8" = 1'-0"



SECTION VIEW
SCALE: 1/8" = 1'-0"



SECONDARY CONTAINMENT AS-BUILT

UNIVERSAL ENVIRONMENTAL SOLUTIONS
1650 HEWLOCK ST, TAMPA, FL 33605

DESIGN + BUILD
AUSTIN CONSTRUCTION GROUP
ACG TAMPA
1302 N 23RD STREET
TAMPA, FL 33605
813-917-9267
SEAL

KEITH COATS
FL P.E. NO. 48917
FL C.O. NO. 30718

DRAWN: A.C.
DATE: 6/28/18

CHECKED: K.C.
DATE: 6/28/18

APPROVED:

PROJECT NUMBER:

SCALE:
AS SHOWN

SHEET NO.

A1.0

INDEX:

UES OILY WATER PRETREATMENT SYSTEM PERMIT UPDATE

TANK & PROCESS USE, CONTAINMENT CAPACITY & OFFLOADING PAD DESIGN DETAIL UPDATE

Process Modification and Tank Use Modification Description

The following submission is developed to provide a response to the inspection violations regarding treatment process additions, equipment repurposing and modifications of permit conditions at the UES Oily Water Pretreatment facility located at 1650 Hemlock Ave Tampa, FL 33568, permit FLR000199802. On 03/16/18 the FDEP conducted an inspection of the facility. On 06/17/18 UES received Warning Letter #WL18-33HW29SWD which detailed several warnings violations. Process modifications, repurposing of the existing system components and appearance of additional tanks were identified as violations of permit conditions. As detailed below in this submission the modifications were conducted to maintain the UES treatment facility compliance with wastewater standards and regulations of the City of Tampa POTW treatment plant and allow economical recycling of waste oils.

Although the original OWS/DAF system operated as designed, the DAF technology could not achieve the required reduction in the allowable metal concentration limits that were recently lowered by the POTW. Also, recent quality restrictions have been placed on the acceptance of the type and quality of recycled oils permitted at several bulk recycled oil facilities. The following minor process changes were instituted at the plant to address these changes while maintaining plant operation. This allowed UES to maintain a local source of oil recycling options for our customers.

To address the stated wastewater metal concentration reductions, a wastewater clarification system was installed and has achieved its purpose allowing us to continue to be compliant with the local POTW. To continue to operate and recycle the waste oils collected at the facility, a thermal oil/water separation systems and additional bulk collection / settling tank was installed. The thermal treatment system has allowed UES to continue to meet the elevated standards imposed by the bulk recycled waste oil handlers.

The OWS/DAF as identified as the original permitted process continues to be the primary technology for oily water separation, no modifications to the permitted OWS/DAF technology have been made at the facility. Installation of the wastewater and oil clarification/polishing process required some of the tanks identified and utilized as storage tanks in the original OWS/DAF. These tanks that were not being fully utilized to operate the OWS/DAF system were repurposed and some additional treatment and settling tanks were added as well. [Table 1-1](#) provides updated information about the type and use for all tanks located at the facility. [Figure 1-1](#) shows the original OWS/DAF Process components, [Figure 1-2](#) is an update to this original permit figure and includes new and repurposed process system components including new tanks and equipment.

The following identifies the new post separation oil and wastewater polishing processes, details tank repurposing and addition of tanks and systems that were required to meet these updated standards:

OWS/DAF – Existing Oil Water Separation and Dissolved Air Floatation (DAF) Process. An offloading pad was installed as detailed in the original permit submission. Two primary filtration box tanks (Tank ID#s 1&2) and three frac tanks (Tank ID#s 3,4 & 5) were added to the offloading pad for oily water storage and additional primary debris separation.

Wastewater Clarification –The wastewater clarification system utilizes a 2-stage process to clarify the wastewater post separation after the primary OWS/DAF process. Stage one is a Sodium Hydroxide / Sulfur Acid Hydroxide precipitation of metals. The second stage uses a filtration and Ionic exchange package system prior to discharge. Tank 4 and Tank 5 (Tank ID#s 10 & 15) of the original permitted OWS/DAF process were repurposed to treat the wastewater post OWS/DAF separation and prior to disposal to the POTW. Two chemical dosing tanks (Tank ID #s 17 &18) were added to the tank farm to accommodat the Precipitation

process and 2 tanks (Tank ID#s 15 & 16) were added to the tank farm for the Ionic Exchange process.

RO Thermal Treatment – Recycled Oil Thermal Treatment was utilized to provide additional oil and water separation and clean the oil prior to shipment offsite for recycling. Tank 1 (Tank ID# 9) identified in the original OWS/DAF permit submission was repurpose by closing the top, installing heat exchange piping internally and installing insulation on the sides and top of the existing tank. A frac tank (Tank ID# 6) was added to the offloading pad for storage and final clarification of recycled thermally treated oil and a steam blowdown tank (Tank ID# 19).

Attachment Descriptions

Table 1-1 Tank Process Use and Update – Provides and update to tanks that were added or modified in each containment area.

Table 1-2 Tank Farm Containment Capacity Update – Provides new containment capacities based on tanks added for new processes.

Table 1-3 Offloading Pad Containment Capacity Update—Provides new containment capacities based on tanks added for new processes.

Figure 1-1 Process Flow Plan – Original permit location and designation of the tanks within the tank and offloading pad areas, included for reference.

Figure 1-2 Process Flow & Tank Location/Use Plan Update (09/28/18) – New plan depicting the location and designation of the new and modified tanks within the tank farm and offloading area.

Figure 1-3 Secondary Containment Pad Design & Tank Farm & Offloading Pad Containment Calculations – P.E. stamped pad and containment calculation figure.

Containment Pad Capacity Calculations

Figure 1-3 is the permit design figure for the installation of the offloading pad and was designed for containment of tank capacities required. The containment capacities are summarized below in **Table 1-2** and **Table 1-3** and are included on **Figure 1-3** for the new offloading pad and **Figure 1-2** for the existing tank farm area.

TABLE 1-1
UES TANK PROCESS USE & UPDATE TABLE
Permit Update Submission 09/28/18

Tank ID #	Tank Type	Pre-Update Process Use	Post-Update Process Use	Containment Area	Name / Primary Content / Purpose	Capacity (Barrels)	Capacity (Gals)
1	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
2	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
3	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 1 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
4	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 2 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
5	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 3 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
6	Steel	New	RO Thermal Treatment	Offloading Pad	Frac Tank 4 / Recycled oil storage final settling & clarification prior to shipment.	477	20,000
7	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 1 / Oily bilge water gravity separation.	1,646	69,115
8	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 2 / Oily bilge water open topped gravity separation tank.	1,646	69,115
9	Steel	OWS/DAF	RO Thermal Treatment	Tank Farm	Post processed oil storage and thermal treatment closed topped square tank.	1,646	69,115
10	Steel	OWS/DAF	Wastewater Clarification	Tank Farm	Wastewater polishing tank 1. Post processed wastewater storage and clarification.	1,646	60,318
11	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 1 / Temporary storage of virgin diesel prior to recycling.	120	5,000
12	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 2 / Temporary storage of virgin diesel prior to recycling.	120	5,000
13	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Gasoline storage tank 1 / Temporary storage of virgin gasoline prior to recycling.	120	5,000
14	Poly	OWS/DAF	Wastewater Clarification.	Tank Farm	Final wastewater settling tank 1. / Hydroxide precipitation settling tank.	240	10,000
15	Poly	New	Wastewater Clarification	Tank Farm	Conical bottom tank 1. Ionic exchange supernate containment tank.	24	1,000
16	Poly	New	Wastewater Clarification	Tank Farm	Round tank with removable lid. Water softener mixing tank	2.5	100
17	Poly	New	Wastewater Clarification	Tank Farm	Wastewater precipitation Sodium Hydroxide storage tank.	24	1,000
18	Poly	New	Wastewater Clarification	Tank Farm	Wastewater precipitation Sulfuric Acid storage tank.	24	1,000
19	Steel	New	Oil Thermal Treatment	Containment Not Required	Conical bottom steam settling tank. Boiler steam condensate.	2	80
20	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sodium Hydroxide storage tank.	24	1,000
21	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Flocculant storage tank.	24	1,000
22	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Coagulant storage tank.	24	1,000
23	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Separated wastewater tank.	48	1,200
24	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF separated oil collection tank.	48	1,200
25	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sludge collection and settling tank.	24	1,000
26	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	Open topped square cone bottom tank for wastewater coarse sand filtration.	18	750
27	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	Open topped square cone bottom tank for wastewater fine sand filtration.	18	750

Poly= Polyethylene tank not used for oily water or oil storage.

UES TANK FARM CONTAINMENT PAD CAPACITY CALCULATION UPDATE

Permit Update Submission 09/28/18

Table 1-2 Tank Farm Containment Pad Capacity Table

Unit Designator	Tank Farm Pad
Calculation Type	Multiple Tanks and Types
Date of Dike Construction	3/1/2014
Is containment protected from rain?	No sumps collect and process rainwater

Date	9/28/2018
ID of largest tank?	Tank ID # 7
Capacity of largest tank (gals)	69,118

Containment Dimensions Inside	Tank Pad Capacity	Quick Conversions
	Containment Part 1	
Length (ft)	85.34	1"=.08
Width (ft)	77.91	2"=.16
Height (ft)	2.5	3"=.24
Volume (gals.)	124,333	4"=.33
Total Volume (gals.)	124,333	5"=.42
		6"=.50

Tank ID and Size (Gallons from Table 1-1) <i>Exclude largest tank</i>	Round Flat-Bottom Tanks *			Rectangle or Square			Total Tank displacement volume (gals)
	Tank Diameter (ft)	Height of cylinder below wall (ft)	Cylinder displacement volume (gal)	Length (ft)	Width (ft)	Height of tank below wall (ft)	
TankID# 7 : 69,115				Excluded**	Excluded**	Excluded**	Excluded
TankID# 8 : 69,116				55.00	14.00	2.50	14,399
TankID# 9 : 69,117				55.00	14.00	2.50	14,399
TankID# 10 : 60,318				48.00	14.00	2.50	12,566
TankID# 11 : 5,000	10.00	2.50	1468.65				1,469
TankID# 12 : 5,000	10.00	2.50	1468.65				1,469
TankID# 13 : 5,000	10.00	2.50	1468.65				1,469
TankID# 14 : 10,000	12.00	2.50	2114.86				2,115
TankID# 15 : 1,000	5.00	2.50	367.16				367
TankID# 16 : 100	3.00	2.50	132.18				132
TankID# 17 : 1,000	5.00	2.50	367.16				367
Tank ID# 18 : 80	5.00	2.50	367.16				367

* Conical bottom tanks assumed flat bottom for ease of calculation.

**Largest tank excluded capacity already included in 110% calculation.

The following results are in gallons:

Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank (69,118 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	124,333	76,030	49,119	123,909	75,214	816	

UES OFFLOADING PAD CONTAINMENT PAD CAPACITY CALCULATION UPDATE

Permit Update Submission 09/28/18

Table 1-3 Offloading Containment Pad Capacity Table

Unit Designator	Offloading Pad
Calculation Type	Multiple Tanks and Types
Date of Dike Construction	12/1/2016
Is containment protected from rain?	No sump collect and process rainwater in system.

Date	9/28/2018
ID of largest tank?	Tank ID # 3
Capacity of largest tank (gals)	20,000

Containment Dimensions Inside	Tank Pad Capacity (See Figure 1-3 for design size)		Quick Conversions	
	Containment Part 1			
Length (ft)*	84		1"=.08	
Width (ft)	63		2"=.16	
Height (ft)**	0.9		3"=.24	
Volume (gals.)	35,875		4"=.33	
Total Volume (gals.)	35,875		5"=.42	
			6"=.50	

* Pad floor meets wall height prior to end of pad to allow truck exiting and entry on concrete ramp without loss on containment liquids. Pad length on design figure includes concrete ramp that is not included in the capacity calculations.

** Pad floor is poured at a 2% grade not flat. The wall height will be averaged over the entire width to calculate the reduction of capacity for this sloping. The most conservative calculations are utilized for capacity calculation.

Tank ID and Size (Gallons from Table 1-1) <i>Exclude largest tank</i>	Round Flat-Bottom Tanks *			Rectangle or Square			Total Tank displacement volume (gals)
	Tank Diameter (ft)	Height of cylinder below wall (ft)	Cylinder displacement volume (gal)	Length (ft)	Width (ft)	Height of tank below wall (ft)	
TankID# 1 : 500 (Raised 6")				22.00	8.00	0.50	0***
TankID# 2 : 500 (Raised 6")***				22.00	8.00	0.50	0***
TankID# 3 : 20,000				Excluded**	Excluded**	Excluded**	**Excluded**
TankID# 4 : 20,000				45.00	8.00	0.50	1,346
TankID# 5 : 20,000				45.00	8.00	0.50	1,346
TankID# 6 : 20,000				45.00	8.00	0.50	1,346

* Conical bottom tanks assumed flat bottom for ease of calculation.

** Largest tank excluded capacity already included in 110% calculation.

*** These filtration tanks are raised 6" off of the so no reduction in capacity will included in capacity

The following results are in gallons:

Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank (20,000 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	35,875	22,000	4,039	26,039	31,836	9,836	

Figure 1-1 Process Flow Plan – Original Permit Figure

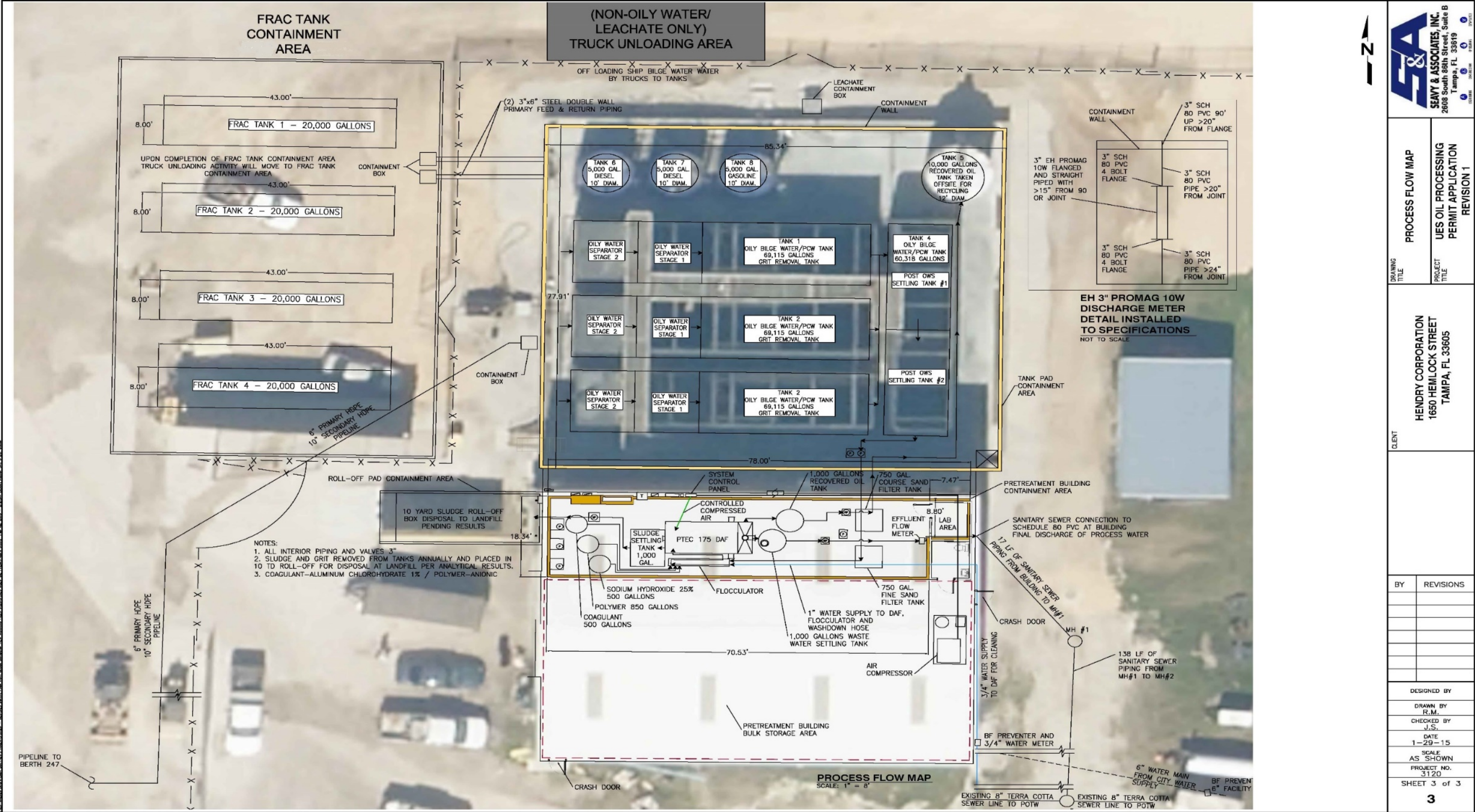


Figure 1- 3 Offloading Area Pad Design and Tank Farm & Offloading Pad Containment Calculations – (Recommended paper print size 24" x 36")

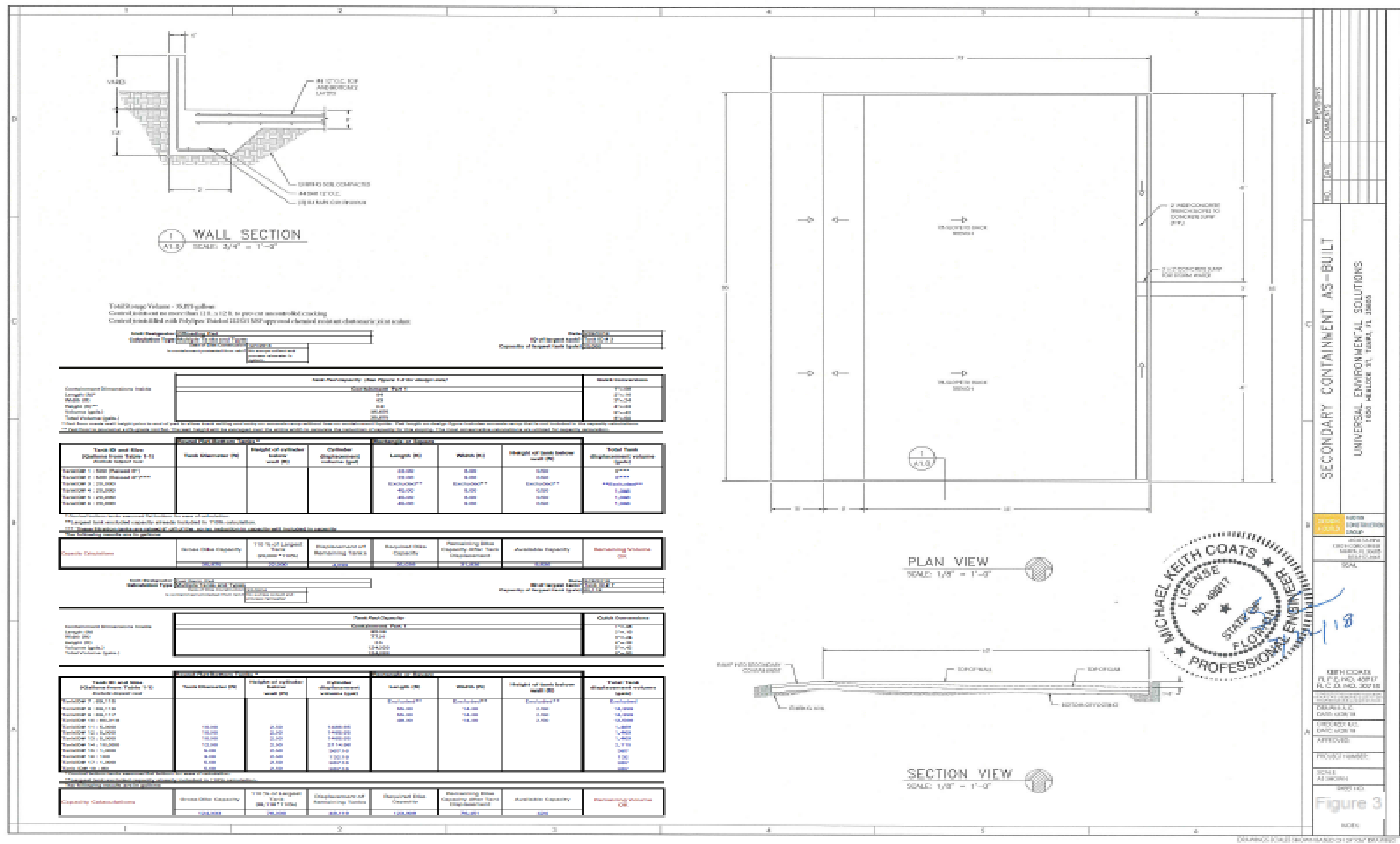


TABLE 1-1
UES TANK PROCESS USE & UPDATE TABLE
Permit Update Submission 09/28/18

Tank ID #	Tank Type	Pre-Update Process Use	Post-Update Process Use	Containment Area	Name / Primary Content / Purpose	Capacity (Barrels)	Capacity (Gals)
1	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
2	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
3	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 1 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
4	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 2 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
5	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 3 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
6	Steel	New	RO Thermal Treatment	Offloading Pad	Frac Tank 4 / Recycled oil storage final settling & clarification prior to shipment.	477	20,000
7	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 1 / Oily bilge water gravity separation.	1,646	69,115
8	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 2 / Oily bilge water open topped gravity separation tank.	1,646	69,115
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11	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 1 / Temporary storage of virgin diesel prior to recycling.	120	5,000
12	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 2 / Temporary storage of virgin diesel prior to recycling.	120	5,000
13	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Gasoline storage tank 1 / Temporary storage of virgin gasoline prior to recycling.	120	5,000
14	Poly	OWS/DAF	Wastewater Clarification.	Tank Farm	Final wastewater settling tank 1. / Hydroxide precipitation settling tank.	240	10,000
15	Poly	New	Wastewater Clarification	Tank Farm	Conical bottom tank 1. Ionic exchange supernate containment tank.	24	1,000
16	Poly	New	Wastewater Clarification	Tank Farm	Round tank with removable lid. Water softener mixing tank	2.5	100
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19	Steel	New	Oil Thermal Treatment	Containment Not Required	Conical bottom steam settling tank. Boiler steam condensate.	2	80
20	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sodium Hydroxide storage tank.	24	1,000
21	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Flocculant storage tank.	24	1,000
22	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Coagulant storage tank.	24	1,000
23	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Separated wastewater tank.	48	1,200
24	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF separated oil collection tank.	48	1,200
25	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sludge collection and settling tank.	24	1,000
26	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	Open topped square cone bottom tank for wastewater coarse sand filtration.	18	750
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Poly= Polyethylene tank not used for oily water or oil storage.

UES TANK FARM CONTAINMENT PAD CAPACITY CALCULATION UPDATE

Permit Update Submission 09/28/18

Table 1-2 Tank Farm Containment Pad Capacity Table

Unit Designator	Tank Farm Pad
Calculation Type	Multiple Tanks and Types
Date of Dike Construction	3/1/2014
Is containment protected from rain?	No sumps collect and process rainwater

Date	9/28/2018
ID of largest tank?	Tank ID # 7
Capacity of largest tank (gals)	69,118

Containment Dimensions Inside	Tank Pad Capacity	Quick Conversions
	Containment Part 1	
Length (ft)	85.34	1"=.08
Width (ft)	77.91	2"=.16
Height (ft)	2.5	3"=.24
Volume (gals.)	124,333	4"=.33
Total Volume (gals.)	124,333	5"=.42
		6"=.50

Tank ID and Size (Gallons from Table 1-1) <i>Exclude largest tank</i>	Round Flat-Bottom Tanks *			Rectangle or Square			Total Tank displacement volume (gals)
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TankID# 10 : 60,318				48.00	14.00	2.50	12,566
TankID# 11 : 5,000	10.00	2.50	1468.65				1,469
TankID# 12 : 5,000	10.00	2.50	1468.65				1,469
TankID# 13 : 5,000	10.00	2.50	1468.65				1,469
TankID# 14 : 10,000	12.00	2.50	2114.86				2,115
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* Conical bottom tanks assumed flat bottom for ease of calculation.

**Largest tank excluded capacity already included in 110% calculation.

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Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank (69,118 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	124,333	76,030	49,119	123,909	75,214	816	

UES OFFLOADING PAD CONTAINMENT PAD CAPACITY CALCULATION UPDATE

Permit Update Submission 09/28/18

Table 1-3 Offloading Containment Pad Capacity Table

Unit Designator	Offloading Pad
Calculation Type	Multiple Tanks and Types
Date of Dike Construction	12/1/2016
Is containment protected from rain?	No sump collect and process rainwater in system.

Date	9/28/2018
ID of largest tank?	Tank ID # 3
Capacity of largest tank (gals)	20,000

Containment Dimensions Inside	Tank Pad Capacity (See Figure 1-3 for design size)	Quick Conversions
	Containment Part 1	
Length (ft)*	84	1"=.08
Width (ft)	63	2"=.16
Height (ft)**	0.9	3"=.24
Volume (gals.)	35,875	4"=.33
Total Volume (gals.)	35,875	5"=.42
		6"=.50

* Pad floor meets wall height prior to end of pad to allow truck exiting and entry on concrete ramp without loss on containment liquids. Pad length on design figure includes concrete ramp that is not included in the capacity calculations.

** Pad floor is poured at a 2% grade not flat. The wall height will be averaged over the entire width to calculate the reduction of capacity for this sloping. The most conservative calculations are utilized for capacity calculation.

Tank ID and Size (Gallons from Table 1-1) <i>Exclude largest tank</i>	Round Flat-Bottom Tanks *			Rectangle or Square			Total Tank displacement volume (gals)
	Tank Diameter (ft)	Height of cylinder below wall (ft)	Cylinder displacement volume (gal)	Length (ft)	Width (ft)	Height of tank below wall (ft)	
TankID# 1 : 500 (Raised 6")				22.00	8.00	0.50	0***
TankID# 2 : 500 (Raised 6")***				22.00	8.00	0.50	0***
TankID# 3 : 20,000				Excluded**	Excluded**	Excluded**	**Excluded**
TankID# 4 : 20,000				45.00	8.00	0.50	1,346
TankID# 5 : 20,000				45.00	8.00	0.50	1,346
TankID# 6 : 20,000				45.00	8.00	0.50	1,346

* Conical bottom tanks assumed flat bottom for ease of calculation.

**Largest tank excluded capacity already included in 110% calculation.

*** These filtration tanks are raised 6" off of the so no reduction in capacity will included in capacity

The following results are in gallons:

Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank (20,000 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	35,875	22,000	4,039	26,039	31,836	9,836	

From: Jim Seavy
To: ["Ed Kinley"](#); [Compton, Elena](#); [Kothur, Bheem](#)
Cc: [Knauss, Elizabeth](#); [Kennedy, Shannon](#); [Cinquino, Dawn](#); [Baker, Bryan](#); [Dougherty, Brian](#)
Subject: RE: UES Drawings - (EPA ID# FLR000199802)
Date: Monday, October 15, 2018 10:59:53 AM
Attachments: [image001.png](#)
[Pages from UES Tank ID Table Capacity Calcs and Offloading Pad Design Build Permit Update 092418 Tables Only.pdf](#)

Elena/Ed

Attached is the copy of the Updated Tank Table identified as Table 1-1 and included on Figure 1-2 in the submission package and the updated Tank Pad and Unloading Pad 110% capacity calculations identified as Table 1-2 and included on Figure 1-3 that was in submission package.

Let me know if you need the source files for larger or custom printing.

Jim Seavy
Project Manager

Seavy & Associates, Inc.
2608 South 86th St
Ste E
Tampa, FL 33619
813-363-0863 cell (Primary)
813-679-0531 office
813-630-1607 fax

From: Ed Kinley <ekinley@uestampa.com>
Sent: Tuesday, October 9, 2018 2:19 PM
To: Compton, Elena <Elena.Compton@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; 'Jim Seavy <jimseavy@seavyassociates.com>' <jimseavy@seavyassociates.com>
Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Dougherty, Brian <Brian.Dougherty@dep.state.fl.us>
Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Yes – we can as it is part of what we are working on now.

Jim Seavy – please send Elena the tank tables.

Regards,
EK



Ed Kinley, President
(813)390-0659

From: Compton, Elena <Elena.Compton@dep.state.fl.us>
Sent: Tuesday, October 9, 2018 2:11 PM
To: Ed Kinley <ekinley@uestampa.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; 'Jim Seavy' <jimseavy@seavyassociates.com> (<jimseavy@seavyassociates.com> (<jimseavy@seavyassociates.com>)
Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Dougherty, Brian <Brian.Dougherty@dep.state.fl.us>
Subject: Re: UES Drawings - (EPA ID# FLR000199802)

Mr. Kinley,

Thank you for the update.

From the perspective of AP-1180 approval, it will be processed timely. However, I have one more request.

In the past, I decided to spare you the trouble of printing out and mailing to us the P.E. drawings. Due to limited clarity of the last drawing (page #8, see the attached), can you please e-mail me separately the tables of this drawing?

Thank you,

Elena

From: Ed Kinley <ekinley@uestampa.com>
Sent: Tuesday, October 9, 2018 1:19 PM
To: Kothur, Bheem; 'Jim Seavy' <jimseavy@seavyassociates.com> (<jimseavy@seavyassociates.com>)
Cc: Knauss, Elizabeth; Kennedy, Shannon; Compton, Elena; Cinquino, Dawn; Baker, Bryan

Subject: RE: UES Drawings - (EPA ID# FLR000199802)

All – We are working diligently on the permit modification. We respectfully request a delay until 10/26 for the revision pages to our current permit.

Please advise.

Regards,

Ed Kinley



Ed Kinley, President

(813)390-0659

From: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Sent: Monday, October 8, 2018 11:13 AM

To: Ed Kinley <ekinley@uestampa.com>; 'Jim Seavy' <jimseavy@seavyassociates.com> (<jimseavy@seavyassociates.com>)' <jimseavy@seavyassociates.com>

Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Compton, Elena <Elena.Compton@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>

Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Hi Ed,

Yes, we are going to modify the permit.

Please submit the application with modification (62-710.901(6), all 8 pages need to complete.

Any updates including Contingency Plan, Emergency Response, Training and SPC Plan, etc.

Updated Site Plan, Revise Tank Table, Containment Calculations, any other changes as appropriate..

Fee of \$ 500, for this major modification.

Bheem

From: Ed Kinley [<mailto:ekinley@uestampa.com>]

Sent: Monday, October 8, 2018 10:58 AM

To: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; 'Jim Seavy' <jimseavy@seavyassociates.com> (jimseavy@seavyassociates.com)' <jimseavy@seavyassociates.com>

Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Compton, Elena <Elena.Compton@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>

Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Thanks for your reply Bheem. Please confirm:

- UES needs to submit “Used Oil Processing Facility Permit Application / Part I” (FDEP Form 62-710.901 (6)). Do we do as an addendum to the currently approved one?
- UES needs to include addendums to current: “Part II Operator Certification” , “Owner Certification”, and “Land Owner Certification”. Plus addendum to current “P.E. Certification”.

Thanks for your continued guidance.

Regards,
EK



Ed Kinley, President
(813)390-0659

From: Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>
Sent: Monday, October 8, 2018 9:42 AM
To: Ed Kinley <ekinley@uestampa.com>; 'Jim Seavy' <jimseavy@seavyassociates.com> (<jimseavy@seavyassociates.com>) <jimseavy@seavyassociates.com>
Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Compton, Elena <Elena.Compton@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>
Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Hello Ed,

As we all know, there are two things are going to be happen and are as follows:

1. Approval of variance for tank 4.
2. Major permit modification to include the tank 4, as UO tank and any other changes to the existing permit conditions. Please go back to our last conference call meeting notes CO and follow.
3. As you know, the application for permit modification was due on September 20, 2018, with a fee?
4. In the meantime, Elena Compton is working on variance approval process.
5. Until the variance is approved, permit modification is Issued, facility cannot use the Frank Tank-4, cannot be used.

If you all have any questions, please let me know.

Thanks,

Bheem R. Kothur, P.E., DEE

From: Ed Kinley [<mailto:ekinley@uestampa.com>]

Sent: Monday, October 8, 2018 9:07 AM

To: Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>

Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Good morning. I thought you all were off today. I know there is a fee associated with this modification. How do we handle that piece?

Regards,

EK



Ed Kinley, President

(813)390-0659

From: Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>

Sent: Monday, October 8, 2018 9:04 AM

To: Ed Kinley <ekinley@uestampa.com>

Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Subject: RE: UES Drawings - (EPA ID# FLR000199802)

Good morning Mr. Kinley. Please let this serve as confirmation the District received a hard copy of UES's "Facility Process Plan & Containment Capacity

Update” drawing plans. Thank you.



Shannon Kennedy
Environmental Manager

Florida Department of Environmental
Protection
Southwest District
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637
Office: 813-470-5789
Shannon.Kennedy@FloridaDEP.gov

From: Ed Kinley [<mailto:ekinley@uestampa.com>]
Sent: Friday, October 05, 2018 10:23 AM
To: Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>
Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>
Subject: RE: UES Drawings

I'll drop them off to your attention.

Regards,
EK



Ed Kinley, President
(813)390-0659

From: Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>
Sent: Friday, October 5, 2018 10:05 AM
To: Ed Kinley <ekinley@uestampa.com>
Cc: Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>
Subject: RE: UES Drawings

Hi Ed! I am currently in the field, with Beth Knauss actually. If it's easier for

you, an electronic copy of the drawings is acceptable for the District. If you wish to drop off a hard copy to the office, you may do so at any time between 8am and 4pm during the week. Regarding review of the drawings, that would be something Bheem would need to conduct (he's a P.E.), but if you have general questions, Beth or I may be able to assist. Speak with you soon. Thanks!



Shannon Kennedy
Environmental Manager

Florida Department of Environmental
Protection
Southwest District
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637
Office: 813-470-5789
Shannon.Kennedy@FloridaDEP.gov

From: Ed Kinley [<mailto:ekinley@uestampa.com>]
Sent: Friday, October 05, 2018 9:30 AM
To: Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>
Subject: UES Drawings

Shannon – are you available this morning to briefly go over our drawings?
11:00?

Regards,
EK



Ed Kinley, President
(813)390-0659

[illegible][illegible]