

Jones Ecosystem Management

Mr. Bheem Kothur
Florida Department of Environmental Protection
MS # 4560
2600 Blair Stone Road
Tallahassee, Florida 32399

January 25, 2008

RE: Ricky's Oil Company Permit Number 61835-HO-001

Dear Mr. Kothur:

We have received the Notice of Deficiency dated January 4, 2008. Please note the following responses:

1. Attachment C, Analysis Plan, page 12: The Tek Mate Leak Detector is self-calibrating each time the unit is activated. Attached is the Operating Manual for the Leak Detector used by the drivers.

A batch of oil for outgoing shipment is a maximum of 25,000 gallons. Samples are taken from each tank using a thief. The methods used for analyses are SW 846- 6010 for As, Cd, Cr, and Pb. PCB's are analyzed using Method SW 846- 8042.

2. Attachment E, Tracking Plan. An example of the tracking log with the indicated checking of the incoming load is attached to this response.
3. Attachment F, SPCC Plan - Section 5.0 with the requested signature of the president of the company, is attached to this response.
4. Attachment F, SPCC Plan – Location of equipment. A diagram showing the locations of the emergency response equipment, is attached to this response.
5. Attachment F, SPCC Plan – Personnel Training. Ricky's Oil employees receive training required for processing used oil, as defined in 62-710, F.A.C. No hazardous waste, as defined in 62-730 F.A.C. (or 40 CFR Part 261) will be managed by Ricky's employees. In the event that sludge from tank clean-outs is determined to be hazardous, the waste will be handled by a firm licensed to manage hazardous waste.

RECEIVED
RCRA

FEB 12 2008

Hazardous Waste Regulation

RECEIVED

FEB 11 2008

BY: BSHW

6. Attachment F, SPCC Plan – Substantial Harm Determination. The signed Certification is included with the revised SPCC Plan attached to this response.
7. Attachment F, SPCC Plan - Secondary Containment Calculations. The signed Certification is included with the revised SPCC Plan attached to this response.
8. Site Location Plan – The signed and sealed site diagram is attached to this response.
9. Site Location Map and Tank Table. Electronic versions of the requested Map and Table will be sent via e-mail.

I believe these responses address the Department's comments. Thank you for your prompt review. If you need any additional information, please contact me.

Sincerely,



John M. Jones, P.E.

cc: Mr. Chris Ricci – Ricky's Used Oil
Ms. Kathy Winston – FDEP Southeast District

Thursby, Kim

From: Epost HWRS
Sent: Friday, January 04, 2008 12:50 PM
To: chris@rickysoil.com
Cc: Kantor, Karen E.; Winston, Kathy; Posner, Augusta; Wick, Fred; Neves, Richard; Raoul.Clarke@dep.state.fl.us; johnmjonespe@sbcglobal.net; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Rickys Oil Service, Inc.;FLD 981 019 755;61835-HO-001;Notice of Deficiency
Attachments: 1-4-08-Rickys Permit Application NOD letter.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 4, 2008

SENT VIA E-MAIL
chris@rickysoil.com

Mr. Chris Ricci, President
Ricky's Oil Service, Inc.
Post Office Box 669295
Miami, Florida 33166-2253

RE: Rickys Oil Service, Inc.
EPA ID Number: FLD 981 019 755
Permit Number: 61835-HO-001
Notice of Deficiency

Dear Mr. Ricci:

The Florida Department of Environmental Protection (Department) has received your permit renewal application to operate a Used Oil Processing Facility at 7209 NW 66th Street, Miami, Florida dated November 20, 2007.

The review of the permit renewal application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies (two copies to Tallahassee and one copy to West Palm Beach district office) of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Chris Ricci, President
January 4, 2008
Page 2 of 2

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp
Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Kathy Winston, DEP/West Palm Beach, kathy.winston@dep.state.fl.us
Augusta Posner, DEP/Tallahassee, augusta.posner@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Richard Neves, DEP/Tallahassee, richard.neves@dep.state.fl.us
Raoul Clarke, DEP/Tallahassee, raoul.clarke@dep.state.fl.us
John Jones, Miramar, johnmjonespe@sbcglobal.net

ATTACHMENT
January 4, 2008
Ricky's Oil Services, Inc.
Miami, Florida
EPA I.D. No. FLD 981 019 755
Notice of Deficiency

1. **Attachment C, Analysis Plan, page 12:** In accordance with Rule 62-710.600(b)(3) Florida Administrative Code (F.A.C.), please provide the capabilities, calibration methods, and frequencies of the Tek Mate Leak Detector used for halogen screening by drivers.

Please describe the procedure for taking batch samples, how many gallons are per batch sample, and what analytical methods are used for analyzing As, Cd, Cr, Pb, and PCBs.

2. **Attachment E, Tracking Plan:** The example invoice in this attachment does not have any indication that halogens were checked on site as pursuant to 40 CFR Parts 279.44 and 279.46. Your acceptance records or logs must indicate that loads are checked upon arrival and before processing. An example of this log should be provided.
3. **Attachment F, Spill Prevention, Control, and Counter Measure (SPCC) Plan, Section 5.0, Management Approval, page 20:** The Management section must be signed and dated by the president of the company.
4. **Attachment F, SPCC Plan, Section 9.3, Contingency Plan and Emergency Response Procedures, page 25:** Pursuant to 40 CFR Part 264.52(e), please identify the locations of emergency equipment specified here and in Attachment 8, page 38.
5. **Attachment F, SPCC Plan, Section 10, Personnel, Training and Discharge Procedures, page 27:** As per requirement of 40 CFR Parts 264.16(d)(1) & (2), please provide job title, job duties and job descriptions for each employee handling hazardous waste.
6. **Attachment F, SPCC Plan, Attachment 1, Substantial Harm Determination, page 30:** The certification page must be signed and dated by the owner. Please review and revise as appropriate.
7. **Attachment F, SPCC Plan, Attachment 5, Secondary Containment Calculations, page 35:** The secondary containment calculations must be certified by a professional engineer with proper seal and date. Please revise the document as appropriate and resubmit.
8. **Figure 2, Site Location Plan, page 58:** All drawings must be certified by a professional engineer with proper seal and date. Please revise the document as appropriate and resubmit.
9. **Site Location Map and Tank Table, page 60:** Please provide a site map (8 ½"x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½ "x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table

can be attached to the permit. Also include hard copies of the map and tank table with your response.