



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 25, 2008

Ronald Patterson, President
Fuels Unlimited, Inc.
Post Office Box 259
Sanford, Florida 32772

OCD-HW-08-119

Seminole County - HW
Fuels Unlimited, Inc.
Information in NCL

Dear Mr. Patterson:

Based on the Department's October 11, 2007, inspection, Fuels Unlimited must ensure the requirements below are met to bring the facility into compliance:

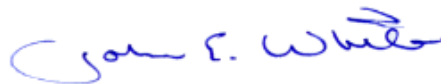
- Fuels Unlimited must ensure that the driver verifies the used oil has been tested using either a "sniffer" or a Dexsil kit (or equivalent) for halogens and that the testing is recorded prior to acceptance. You should also include a "pass / fail" note on the shipping paper.
- The collection tote in the loading area needs to be clearly labeled "Used Oil."
- Loads of used oil can only be accepted if accompanied by adequate test results performed by the generator or, analysis conducted by Fuels Unlimited that documents the used oil being accepted is on-specification prior to off-loading the used oil into the facility's tanks. Also, the facility must document all analyses performed on-site and include information such as time, date, type of analysis, origin of sample, who performed the analyses, and the results of the analyses.
- Based on the results of the Department's laboratory testing versus the XRF machine testing, it appears the values reported for lead by the XRF machine are not correct. The machine must be repaired or replaced or Fuels Unlimited must use an outside laboratory to perform the analyses.
- Fuels Unlimited must properly analyze all out-going shipments of used oil fuel before claiming the fuel meets on-specification requirements of 40 CFR 279.11. When a tank of oil is full and/or ready for shipment off-site as on-specification fuel, Fuels Unlimited must test the contents of the tank to document it meets all of the specifications of 40 CFR 279.11. At this point, no further oil can be placed

into the tank unless the facility wants to re-analyze the used oil fuel. Copies of these analyses must be kept in the facility record.

- Fuels Unlimited must document the EPA identification number of the generator, transporter, or processor/re-refiner who provided the used oil for transport on each shipping paper. Fuels Unlimited was provided with a link to the Department's database containing Florida EPA identification numbers to ensure Fuels Unlimited can easily meet this requirement in the future.

If you have any questions, please contact me at john.white@dep.state.fl.us or at (407)893-3323.

Sincerely,



John White
Environmental Specialist

jw