



Ron H. Noble
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Received

MAY 03 2010

BSHW

April 29, 2010

MAY 05 2010

Mr. Bheem Kothur
Florida Department of Environmental Protection
2600 Blair Stone Road
MS 4560
Tallahassee, FL 32399-2400

Re: Clarification on Leak Detection and Release Detection Methods for
Florida Recycling Solutions, LLC Used Oil Processing Facility Permit
ID No.: FLR 000 034 033
Permit No.: 294693-HO-001

Dear Mr. Kothur:

Thank you for the Florida Department of Environmental Protection's Notice of Intent to Issue Permit for the Used Oil Processing Facility Permit for the Florida Recycling Solutions, LLC facility in Lakeland, Florida. This correspondence will confirm that Florida Recycling Solutions, LLC does not have any further comments or proposed revisions to the Permit.

However, Florida Recycling Solutions, LLC wants to clarify any issues in connection with the Permit requirements to provide a leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours. This leak detection requirement is set forth in Part I, Condition 32.(b)5 of the Permit, with additional references to the same condition in Part II, Condition 6.(b)5 and again in Part III, Condition 1.(b)5.

This correspondence will confirm that Florida Recycling Solutions, LLC will comply with applicable leak detection and release detection standards by utilizing visual inspection methods and procedures, including applicable recordkeeping requirements for the visual inspections. The purpose of this correspondence is to ensure that the Department and Florida Recycling Solutions, LLC are in agreement that visual monitoring of the regulated aboveground storage tank system shall fulfill and comply with applicable leak detection and release detection requirements. If the Department has any concerns or questions regarding this correspondence, we ask that you contact me as soon as possible to address same. As always, please do not

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hesitate to contact me should you have any questions regarding the above matters or if you require any additional information.

Sincerely yours,

FOWLER WHITE BOGGS P.A.



Ron H. Noble

cc: Mr. W.D. Miller
Mr. James Dregne

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