

August 5, 2010

Mr. Bheem Kothur, P.E. III
Hazardous Waste Regulation
2600 Blair Stone Rd. MS 4560
Tallahassee, FL 32399-2400

RE: Water Recovery, LLC. – Jacksonville Facility
EPA ID No. FLR 000 069 062; Permit No. 79677-HO-07
Application Response to FDEP April 8, 2010 Letter, Attachment Item 7

Dear Mr. Kothur,

Water Recovery Inc. (WRI) applied for renewal of the above referenced permit on February 15, 2010. Our initial request was early in advance of the October 11, 2010 expiration date primarily in connection with a revised Part I application submittal for an Operator name change from WRI to Water Recovery LLC (WR LLC). When making this request, WRI anticipated the renewal process would not require substantial effort in light of past experience and given the fact that there have been no substantial changes to the facility plant or operation.

WR LLC received comments from your department on April 8, 2010 stating the application was incomplete with a number of additional information requests. WR LLC respectfully submits this letter as a response to the additional information request, attachment item 7, Tank Inspection.

WR LLC considers the used oil tank systems a mission critical component of our business. As such, we invest the necessary resources to maintain these important systems to ensure operational reliability, and longevity of these assets. To achieve these goals we have comprehensive programs for maintenance and inspection, which I will detail below.

Maintenance

In a typically year, three of the used oil tanks are selected, on a rotating basis, to be taken completely off line for sludge cleaning and visual inspection of the interior condition of the tank. The specific number of tanks selected for this action may be increased based on unusual sludge loading of the systems which could negatively impair the functional operation of the used oil processing activities.

A considerable investment in maintenance of the tank system condition was made recently in 2007. Water Recovery retained a professional industrial tank painting contractor to prepare the used oil tanks for external inspection, and application of a new coating. All of the used oil tanks were professionally repainted in 2007.

Inspection

In 2001, Law Engineering and Environmental Services, Inc. (LAW) was retained by Water Recovery to perform an external and internal assessment of tanks 1P through 10P, 1SW and the discharge tank of our industrial wastewater plant. The assessment included industry standardized nondestructive testing (NDT) of all of these tanks. A copy LAW complete report has been attached (#1A and #1B). Also included is a copy of the corrective action documentation showing that the recommendations from the LAW report were completed by a qualified contractor, IND-MAR Industries (#2).

Water Recovery has a program of routine tank system inspection and documentation. These tanks have been inspected weekly by the Plant Engineer or the Production Manager since they were put into service by Water Recovery. A copy of the weekly tank inspection reports for the full year 2009 (#3) and year to date 2010 (#4) are attached.

Our used oil tanks systems are subject to formal annual FDEP Storage Tank Facility Compliance Inspection program. This inspection process is comprehensive, and copies of the FDEP inspection reports beginning in 2001 through 2010 are attached (#5).


In addition to our normal tank cleaning and inspection program, tanks 1P and 9P were recently taken completely out of service for NDT evaluation. GE Inspection Services was retained by Water Recovery to perform industry standardized nondestructive testing (NDT) of these tanks. A copy of the GE Inspection Services report is included as attachments (#6A, 6B, 6C, 6D).

Summary

WR LLC considers the used oil tank systems a critical component of our business. We invest the necessary resources to maintain these important systems to ensure their operational reliability, and longevity. We have comprehensive programs for internal and external tank system maintenance, including regular cleaning and sludge removal. We have multiple layers of tank inspection, including well documented weekly inspections, formal annual FDEP tank system inspections, and periodic standardized NDT testing by qualified professionals.

Please do not hesitate to call should you have any questions or require further information at this time.

Kindest Regards,



Gregory Reynolds
Vice President & General Manager