

Perry, Jenna D.

From: Greg Reynolds [greynolds@wrijax.com]
Sent: Wednesday, October 13, 2010 4:20 PM
To: Perry, Jenna D.
Subject: re: Water Recovery LLC - inspection 9/2/10
Attachments: 100_1204.JPG; 100_1205.JPG; fire extinguishers and spill kits.pdf; 100_1190.JPG; 2008 FUO_Permit.pdf

Dear Ms Perry,

We received your September 28th email and have prepared the following status report for the listed items.

1. Two plastic cups containing a small amount of used oil were found in the trash outside the lab.

The two oily plastic cups were removed from the trash can outside the lab.

Direct follow up training has been conducted to reinforce with Water Recovery personnel that no oily trash should be placed in this container.

2. There were three containers (2 buckets, 1 bin) of used oil and two buckets of used oil/sludge in the containment that were not labeled "Used Oil."

The buckets and bins that are used to contain any drips from falling on the containment surfaces during connection and disconnection of transfer hoses have been labeled "Used Oil." (see attached photo)

Records Related issues:

3. On 3/18/10 (doc tracking # CR 031810) – APC is listed as the transporter of 5,847 gallons of used oil to Coastal Refining. There was no EPA ID number on the delivery record for APC, and APC is not a registered used oil transporter in Florida. The destination or end use of the used oil was also not included in the record. The EPA ID # for Coastal Refining (the destination) was not on the record.

The carrier Associated Petroleum Carriers (APC) was never hired by Water Recovery, but was hired by our customer Coastal Refining. Upon further records checking, we have discovered that APC was properly registered as a used oil transporter in Florida (see attached file) through 6/30/2009. We had verified and documented with our customer Coastal Refining that APC had current Florida used oil transporter registration in 2009, when they once previously requested APC be hired by them to pick up used oil from Water Recovery. I have recently spoken directly with Mr. Jared Bishop of APC, and he indicated that APC was in process of renewing this registration. Water Recovery, LLC will not permit that used oil be transported from our facility by any carrier that is not properly registered. We have modified our standard used oil record keeping forms (submitted in the Water Recovery, LLC Used Oil Permit Renewal) to include the recording of the end use code. As part of the training review with WRI lab personnel, we reinforced that the shipping documents and record keeping forms must be fully and properly completed, including EPA ID numbers, even when the shipping documents are prepared by others.

4. On incoming "oily water" shipments, you indicated that halogens are only run on these shipments if the total of used oil is determined to be 90% or greater. Is this correct?

All incoming shipments of materials manifested as used oil or petroleum contact water are tested and results recorded for halogens content prior to acceptance at WRI.

I believe the confusion on this item may be regarding our fingerprint screening of incoming shipments to our industrial wastewater plant, as potentially non-conforming to the generators waste profiles.

Contingency Plan – there is not a good list of emergency equipment (fire extinguishers, spill control kits, etc.) included in the Plan that contain locations, specifications, and capabilities of the equipment.

The detailed diagrams in the contingency plan identify the locations, types and capacities of the fire extinguishers as well as the location of spill kits and decontamination materials. (see attached file) In addition we maintain a detailed full listing of the spill kit inventory, readily available in an urgent situation

on the inside of the container lid. (see attached photos) The spill kit inventory is maintained and verified as complete periodically by WRI maintenance personnel.

Once again, your inspection efforts and comments are sincerely appreciated. Please contact me directly should you require any additional information.

Kindest regards,

Gregory Reynolds
Vice President & General Manager
Water Recovery, LLC.
Office 904-475-9320
Mobile 904-614-0145
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greynolds@wrijax.com

----- Original Message -----

From: "Perry, Jenna D." <Jenna.D.Perry@dep.state.fl.us>
To: "Greg Reynolds" <greynolds@wrijax.com>
Date: Tue, 28 Sep 2010 16:23:33 -0400
Subject: Water Recovery LLC - inspection 9/2/10

Greg,

Here is a list of the issues found during my inspection of the Water Recovery LLC used oil processor:

Facility issues:

5. Two plastic cups containing a small amount of used oil were found in the trash outside the lab.
6. There were three containers (2 buckets, 1 bin) of used oil and two buckets of used oil/sludge in the containment that were not labeled "Used Oil."

Records Related issues:

7. On 3/18/10 (doc tracking # CR 031810) – APC is listed as the transporter of 5,847 gallons of used oil to Coastal Refining. There was no EPA ID number on the delivery record for APC, and APC is not a registered used oil transporter in Florida. The destination or end use of the used oil was also not included in the record. The EPA ID # for Coastal Refining (the destination) was not on the record.
8. On incoming "oily water" shipments, you indicated that halogens are only run on these shipments if the total of used oil is determined to be 90% or greater. Is this correct?
9. Contingency Plan – there is not a good list of emergency equipment (fire extinguishers, spill control kits, etc.) included in the Plan that contain locations, specifications, and capabilities of the equipment.
10. On incoming "oily water" shipments, you indicated that halogens are only run on these shipments if the total of used oil is determined to be 90% or greater. Is this correct?

This may not be a complete list of items requiring further action. I am still in discussion with Ashwin regarding some PCW stuff, so that may be included in the report as well. If you have any questions, please let me know.

Regards,

Jenna Perry
Environmental Specialist III - Hazardous Waste
Florida Department of Environmental Protection
office: 904-807-3382 | fax: 904-448-4362

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