

From:

Dee Miller [deemiller@tampabay.rr.com] Tuesday, June 14, 2011 1:57 PM Kothur, Bheem; Dregne, James

Sent:

To: Cc:

Noble, Ron

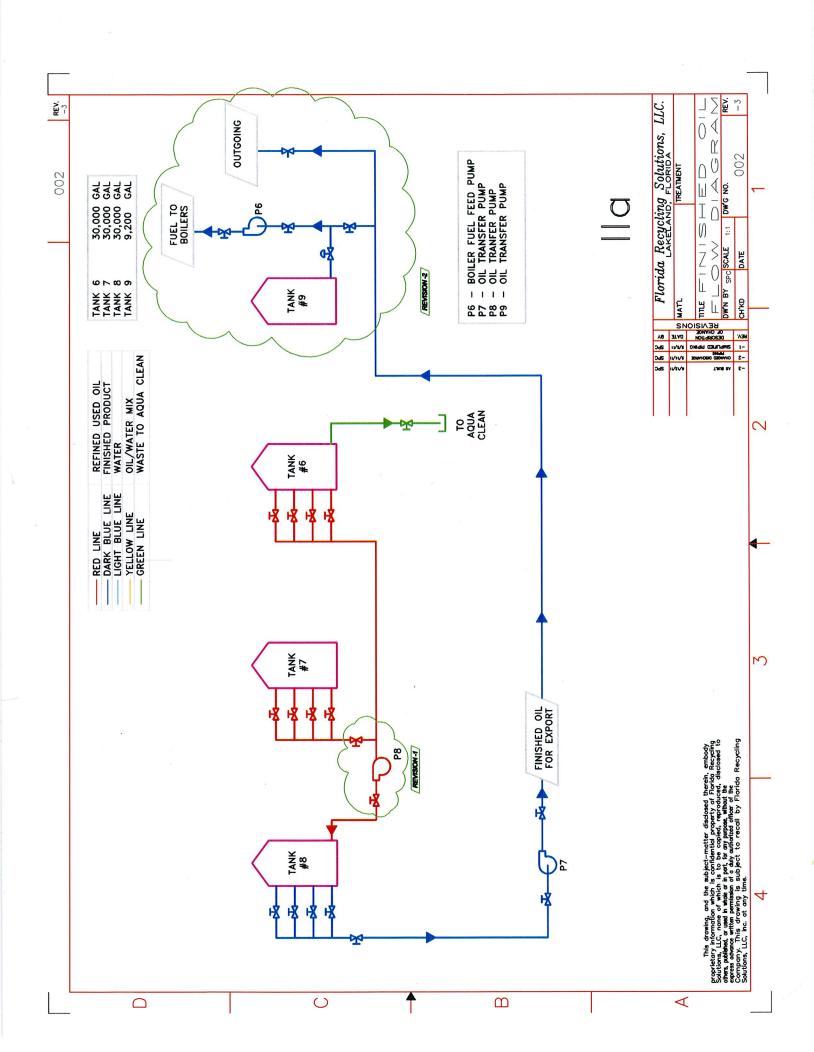
Subject:

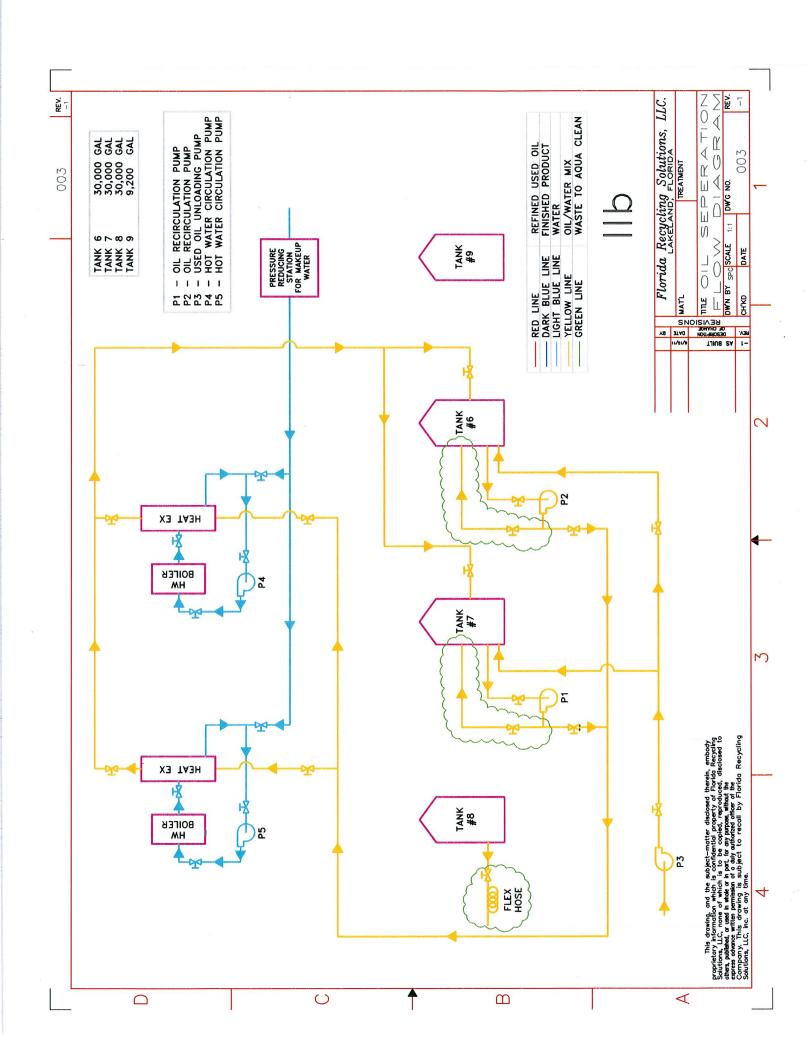
Permit: 294693-HO-001:294693-SO-002

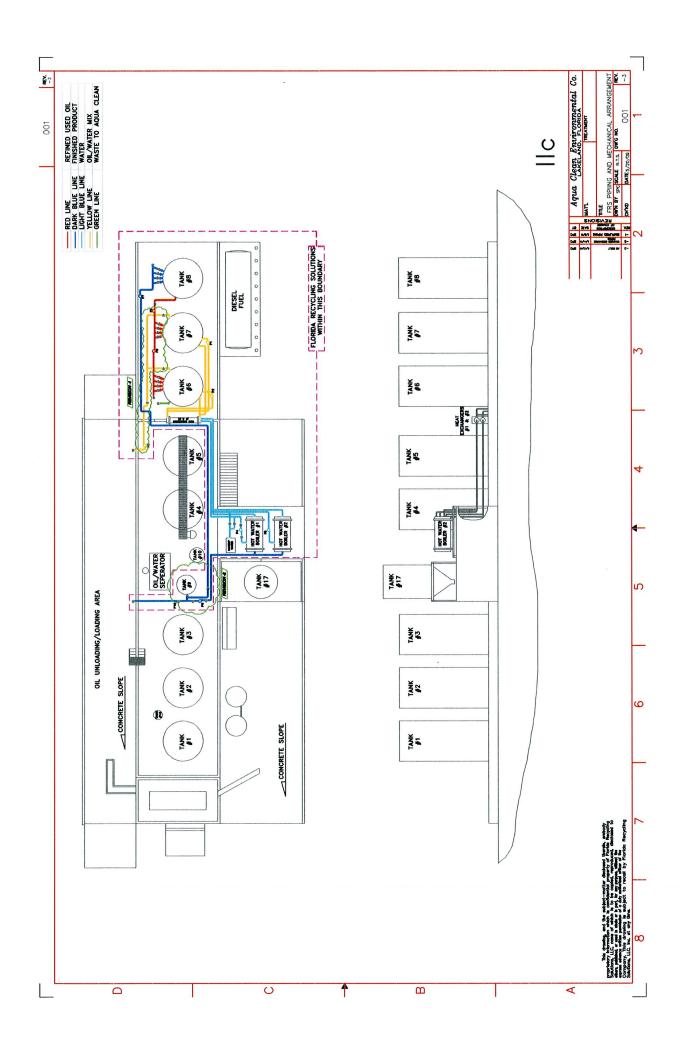
Attachments:

AQ 001 REV 3.pdf; AQ 002 REV 3.pdf; AQ 003 REV 1.pdf

Please find attached the as built drawings for the FRS plant in Lakeland.







From:

Noble, Ron [rnoble@fowlerwhite.com]

Sent:

Friday, June 10, 2011 3:12 PM

To:

Kothur, Bheem

Cc: Subject: 'Dee Miller'; Tripp, Anthony; Dregne, James; Noble, Ron RE: Send data from MFP-07182301 03/22/2011 12:46

Thanks Bheem.

We appreciate the Department's confirmation that no Permit Modification is required based upon the minor revision to the final piping layout and configuration. FRS will submit the final as-built drawing which depicts the final piping configuration to the Department within the next 10 days. After submittal of this drawing, FRS plans to place the used oil processing facility into operation.

Thanks again to you and Jim Dregne for your assistance on this project, Ron

Ron H. Noble

Fowler White Boggs P.A.

501 E. Kennedy Blvd, Suite 1700

Tampa, Florida 33602 Direct: 813 222 1175 Fax: 813 229 8313

rnoble@fowlerwhite.com

----Original Message----

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]

Sent: Thursday, June 09, 2011 1:33 PM

To: Noble, Ron

Cc: 'Dee Miller'; Tripp, Anthony; Dregne, James

Subject: RE: Send data from MFP-07182301 03/22/2011 12:46

Hello Ron,

As you know, based on your discussions with DEP/SW District (Jim Dregne) on June 8, 2011 about our comments regarding the Tank 8 and its piping connection. DEP is satisfied With your explanation and the use of Tank 8 piping related issues.

Accordingly, please revise the appropriate as-built drawings as per the discussion with Jim Dregne and re-submit the revised drawings for our approval and record. Upon receiving and approving the as built drawings by the department, facility may start using those tanks to store the used oil and processing it (PART II.7 and 8 of the permit issued dated May 12, 2011).

If you have any questions, please let me know. Thanks.

Bheem

----Original Message----

From: Noble, Ron [mailto:rnoble@fowlerwhite.com]

Sent: Friday, May 13, 2011 2:15 PM

To: Kothur, Bheem

Cc: 'Dee Miller'; Tripp, Anthony; Dregne, James

Subject: RE: Send data from MFP-07182301 03/22/2011 12:46

Hi Bheem:

The purpose of this transmittal to respond to the Department's question set forth below for the FRS facility in Lakeland, Polk County.

We do not believe any revisions to either of the drawings are necessary to respond to the Department's inquiry. Specifically, there is no oil/water mixture generated from Tank 8. That tank is the finished oil storage tank as set forth in the Permit Application and backup documentation for this facility. If there is ever a need to remove water from the bottom of Tank 8, FRS maintains a fitting at the bottom of this tank that can be connected to a flexible hose.

We hope the information set forth above is fully responsive to the Department's question and request for information. We look forward to the Department's response to our correspondence dated February 22, 2011.

Thanks, Ron

Ron H. Noble
Fowler White Boggs P.A.
501 E. Kennedy Blvd, Suite 1700
Tampa, Florida 33602
Direct: 813 222 1175
Fax: 813 229 8313
rnoble@fowlerwhite.com

----Original Message----

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]

Sent: Tuesday, March 22, 2011 5:10 PM

To: Noble, Ron

Cc: 'Dee Miller'; Tripp, Anthony; Dregne, James

Subject: FW: Send data from MFP-07182301 03/22/2011 12:46

Hello Ron,

I have received the above attachments and reviewed and have the following comments:

- 1. Drawing No. 002, Finished Oil Flow Diagram (IIa): No comments
- 2. Drawing No. 003, Oil Separation Flow Diagram (IIb) and Drawing Number No 001, FRS Piping And Mechanical Arrangement (IIC):

Please clarify where does Oil/Water Mix from Tank 8 go? There is not an Oil Water Mix line here. Please review these two drawings and revise as appropriate.

Please ignore that my scanned drawings and these are incomplete, and you may have complete drawings.

If you have any questions, please feel free to call me.

Thanks.

Bheem

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Copy the url below to a web browser to complete the DEP survey: http://survey.dep.state.fl.us/?refemail=Bheem.Kothur@dep.state.fl.us Thank you in advance for completing the survey.

From: exchadmin@DEP.state.fl.us [mailto:exchadmin@DEP.state.fl.us]

Sent: Tuesday, March 22, 2011 3:46 PM

To: Kothur, Bheem

Subject: Send data from MFP-07182301 03/22/2011 12:46

Scanned from MFP-07182301. Date: 03/22/2011 12:46

Pages:5

Resolution:200x200 DPI

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If you desire a formal opinion on a particular tax matter for the purpose of avoiding the imposition of any penalties, we will discuss the additional Treasury requirements that must be met and whether it is possible to meet those requirements under the circumstances, as well as the anticipated time and additional fees involved.

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From:

Dregne, James

Sent:

Thursday, June 09, 2011 12:04 PM

To:

Kothur, Bheem

Subject:

FRS

Importance:

High

Hi Bheem,

Looking at the permit, I see that FRS needs to do these three things prior to beginning operations. The key item is paragraph #8 which say we must give our approval of the as built drawings. Do you see anything else?

PART I

33. Prior to beginning operation, the Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps prior to beginning operation of the used oil processing facility [40 C.F.R. 279.54(d)(2) and 40 C.F.R. 279.54(e)(2)].

Part II

- 7. Permittee shall submit as built drawings for any changes to tanks during the Permit Application review period or the permit Intent to Issue process period for the proposed and constructed tanks within thirty (30) days of issuing this permit. Each drawing shall be signed and sealed and certified by a Professional Engineer registered in the State of Florida.
- 8. The Permittee shall not use, operate, or otherwise conduct any activities with the proposed new tanks until the Final Permit is Issued and the as built drawings for any changes to any tank have been approved by the Department. Then the Permittee may start using those tanks to store the used oil and processing it.

Jim

JAMES M. DREGNE
FL. DEPT OF ENVIRONMENTAL PROTECTION
Hazardous Waste Program Manager, Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
ph (813) 632-7600 ext.410, fax (813) 632-7664
james.dregne@dep.state.fl.us

To:

Noble, Ron

Cc:

'Dee Miller'; Tripp, Anthony; Dregne, James

Subject:

RE: Send data from MFP-07182301 03/22/2011 12:46

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As per the discussion with Time regulation and the use of Tank 8 piping related issues.

Accordingly,
Please revise and reflect the changes in as appropriate as-built drawings and re-submit the revised drawings for our approval and record. Upon receiving and approving the as built drawings by the department, facility may start using those tanks to store the used oil and processing it (PART II.7 and 8 of the permit issued dated May 12, 2011).

If you have any questions, please let me know. Thanks.

Bheem

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Subject: RE: Send data from MFP-07182301 03/22/2011 12:46

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Thanks, Ron

Ron H. Noble

Fowler White Boggs P.A.

501 E. Kennedy Blvd, Suite 1700

Tampa, Florida 33602 Direct: 813 222 1175 Fax: 813 229 8313

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Bheem

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matter(s) addressed in this message.

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Ron H. Noble Direct Dial: 813-222-1175 rnoble@fowlerwhite.com Received

FEB 23 2011

February 22, 2011

BSHW

VIA FEDERAL EXPRESS

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

FEB 2 3 2011

Hazardous Waste Regulation

Re:

Revision to Piping Plan for Florida Recycling Solutions, LLC Used Oil and

Material Processing facility Permit EPA ID No.: FLR 000 034 033

FDEP Permit No.: 294693-HO-001; and 294693-SO-002

Lakeland, Polk County, Florida

Dear Mr. Kothur:

Pursuant to our recent telephone conversation, the purpose of this correspondence is to provide additional information to the Florida Department of Environmental Protection in connection with a revision to the approved plans and drawings for the Florida Recycling Solutions, LLC ("FRS") used oil and material processing facility in Lakeland, Polk County, Florida. As we discussed, FRS is preparing to initiate construction of the used oil and material processing facility which is authorized by the above-referenced Permit issued by the Department.

The engineers and contractors retained by FRS have identified a more simplistic and effective piping layout and plan for regulated Tanks 6, 7 and 8 identified in the above-referenced Permit. We have enclosed three separate drawings which identify the minor revisions for the simplification of the piping plan for Tanks 6, 7 and 8. The "revision" areas are highlighted and identified on each of these three drawings.

All of the piping, pumps and other appurtenaces for these tanks will still be located within the designated secondary containment structures set forth in the above-referenced permit. FRS and this office are requesting the Department's review of this correspondence and the attached drawings to confirm that no formal Permit Modification or Permit Modification Application is required in connection with this minor revision to the piping plan. If the Department is in agreement that no formal Permit Modification is required in connection with this revision, FRS and its consultants will construct the facility and identify the revisions on the

FOWLER WHITE BOGGS P.A.

Mr. Bheem Kothur February 22, 2011 Page 2

final As-Built Drawings which will be submitted to the Department after the facility is constructed pursuant to the terms and provisions of the Permit.

After the Department has an opportunity to review this correspondence and the enclosed drawings, we simply request brief written confirmation or an e-mail from the Department confirming that no formal Permit Modification is required in connection with this matter. We want to thank the Department in advance for its review and consideration of this request, and we look forward to the Department's written confirmation at your earliest possible convenience. In the interim, please do not 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. James. Dregne (w/encl.) Mr. W.D. Miller (w/o encl.)

Enclosure

43147471v1

RED L DARK LIGHT YELLC **GREEN** TANK TANK #8 #7 W Р8 REVISION -1 / FINISHED OIL FOR EXPORT This drawing, and the subject—matter disclosed therein, embody proprietary information which is confidential property of Florida Recycling Solutions, LLC, none of which is to be copied, reproduced, disclosed to others, published, or used in whole or in part, for any purpose, without the express advance written permission of a duly authorized officer of the Company. This drawing is subject to recall by Florida Recycling Solutions, LLC, inc. at any time.

