

Bheem,

I have made only a few notes on the draft permit. I am only sending the pages where I have made any type of note. It is in blue so you should be able to read them clearly.

I am sending the following pages: 1, 2, 10, 15, 22, and 23

I do have two questions.

1. What does it entail to store PCW? (Page one, paragraph 3, last sentence...It is not authorized to store PCW.) There are other areas where you have written in storage of PCW. What does it entail to store PCW?
2. Referring to page 8, number 26; what would it entail to get a 30 day TSD permit? We wanted to know in case we ever wanted to go that direction.

Thank you.

Karen





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard  
Jr.  
Secretary

## PERMITTEE:

Fuels Unlimited, Inc.  
509 South French Avenue  
Sanford, Florida, 32771

I.D. Number: FLR 000 050 369  
Permit Number: 266845-HO-002  
Date of Issue: DRAFT  
Expiration Date: March 26, 2017  
County: Seminole  
Lat/Long: 28° 48' 27" N, 81° 16' 22" W

Attention:  
Ronald Patterson, President

Project: Used Oil Processing Facility

This is a new permit issued under the provisions of Section 403 of the Florida Statutes (F.S.), Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740, 62-762 and 62-770 of the Florida Administrative Code (F.A.C.), and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated January 30, 2012 and revised or supplemented by submissions dated April 30, 2012, May 25, 2012, June 25, 2012 and June 28, 2012 that are incorporated herein and collectively referred to as the "permit application". The permit application also includes any approved closure cost estimates, approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereto. The facility is specifically authorized and described as follows:

To operate a Used Oil Processing Facility hereinafter referred to as the "Facility". The Used Oil Processing Facility is located on an approximately 0.39 - acre parcel of land owned by Fuels Unlimited, Inc. in Seminole County, 509 South French Avenue, Sanford, Florida 32771. Diagrams of the site layout and tank storage area are included as Attachment A of this permit. Tank capacity and contents are shown in Attachment B (Tank Table) of this permit.

The facility is authorized to process used oil, accepts only non-hazardous, non-biological industrial wastewater, primarily from the following: petroleum contact water (PCW) consisting almost entirely of gasoline/diesel/water mixtures from petroleum storage facilities; industrial process wastewater; landfill leachate; wastewater from tank cleaning, transportation and environmental remediation sources. This facility is authorized to handle PCW. It is not authorized to store PCW.

17503  
5008  
for  
The Facility consists of eight (8) tanks. Tanks numbered 1 through 8. Tanks 1 through 4 have a capacity of ~~17,740~~ gallons each used for used oil. Tank 5 and 6 having a capacity of ~~20,490~~ gallons each of used oil, Tank 7 having a capacity of ~~5,000~~ gallons used for oily water and Tank 8 having a capacity of ~~5,000~~ gallons of Recyclable Coolant. All storage tanks are constructed of steel and are located within secondary containment. These tanks are located in a concrete secondary containment structure that is sealed and impervious to petroleum products shown on the drawing in Attachment A of this permit. 20,001

Used  
Use oil is either picked in a tanker truck owned and operated by Fuels Unlimited, Inc. or used oil is brought to the facility by another used oil transporter. Fuels Unlimited, Inc. operates a used oil



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processor facility for storage only and does not conduct any additional used oil processing on site. The Fuels Unlimited, Inc. facility consists of a main office building, a spill control shed, an equipment storage shed, a used oil transfer area, ~~an in-active fuel loading rack~~. Attachment B summarizes aboveground tanks status. *delete*

**The following documents were used in preparation of this permit:**

1. Permit Application dated May 31, 2006 and additional information dated August 10, 2006.
2. Permit Renewal Application dated January 30, 2012
3. FDEP letter dated February 24, 2012.
4. Revised Used Oil Processing Facility Application dated April 30, 2012, FDEP received on May 01, 2012, and revised or supplemented by submissions dated May 25, 2012, June 28, 2012.
5. The Department approved closure cost estimates and its adequately funded financial assurance letter dated July 15, 2012.



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- (7). Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.
- c. All tank systems shall be provided with secondary containment that at a minimum meets the requirements of 40 CFR 279.54(d) or 4 CFR 279.54(e) and Subsection 62-710.401(6), F.A.C.
33. 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 CFR 279.54(d)(2) and 40 CFR 279.54(e)(2)].
34. The Permittee shall label or mark all containers and aboveground tanks, used for storage or processing of used oil, with the words "Used Oil" [Subsection 62-710.401(6), F.A.C., and 40 CFR 279.54(f)].
35. The Permittee shall label or mark all containers or tanks which are solely used for the storage of Petroleum Contact Water with the words "Petroleum Contact Water" [Rule 62-740.100, F.A.C.]. *(page one states not authorized to store PCW)*
36. The Permittee shall store used oil, PCW, used oil residues or used oil filters only in those containers or tanks which are made of or lined with materials that will not react with and are otherwise compatible with the waste to be stored. *?*
37. If a container or tank holding used oil, PCW, used oil residues or used oil filters is not in good condition (e.g., rusting, bulging) or begins to leak, the Permittee shall transfer the waste to another container or tank which is in good condition [40 CFR 279.22]. *?*
38. As part of the general operating requirements, the Permittee shall:
- Not place used oil, other wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;
  - Use appropriate controls and practices to prevent spills and overflows;
  - Follow the operating procedures described in the permit application; and
  - Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.
39. The Permittee shall inspect the tank system in accordance with the permit application. These requirements include:
- Developing and following a schedule and procedure for inspecting overfilling controls;
  - Inspecting at least once each operating day the aboveground portions of the tank system, and the construction materials and area immediately surrounding the tank storage area. However, the Permittee shall document the daily inspections at least once a week; and
  - The results of the inspections in (a) and (b) of this condition shall be maintained in the operating record at the facility.



### PART III – TANK AND CONTAINER CONDITIONS

“Tank system”, for the purpose of Part III of this permit, is defined as storage tank(s) 1 through 8, appurtenant equipment and secondary containment structures comprising the Permittee used oil processing facility.

1. The Permittee shall prevent the release of (petroleum contact water, used oil, oily waste or oily wastewater) to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:
  - a. All new components shall have secondary containment as required by Parts (b) and (c) of this condition prior to being put into service.
  - b. The secondary containment system shall meet the requirements of 40 CFR 279.54 and shall be:
    - (1). Designed, installed and operated to prevent any migration of waste or accumulated liquid to the soil, groundwater or surface waters.
    - (2). Capable of detecting and collecting releases and run-on until the collected material is removed.
    - (3). Constructed of, or lined with, materials compatible with the waste to be stored and of sufficient strength to sustain the stresses induced by failure of the primary containment system as well as other stresses that may be induced by the environment.
    - (4). Placed on a foundation or base capable of providing support to the secondary containment system.
    - (5). Provided with 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.
    - (6). Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.
    - (7). Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.
  - c. Ancillary equipment shall be provided with secondary containment.
2. The Permittee shall, in the event of a release:
  - a. Stop the release;
  - b. Contain the release;
  - c. Clean up and manage properly the released waste and other materials; and



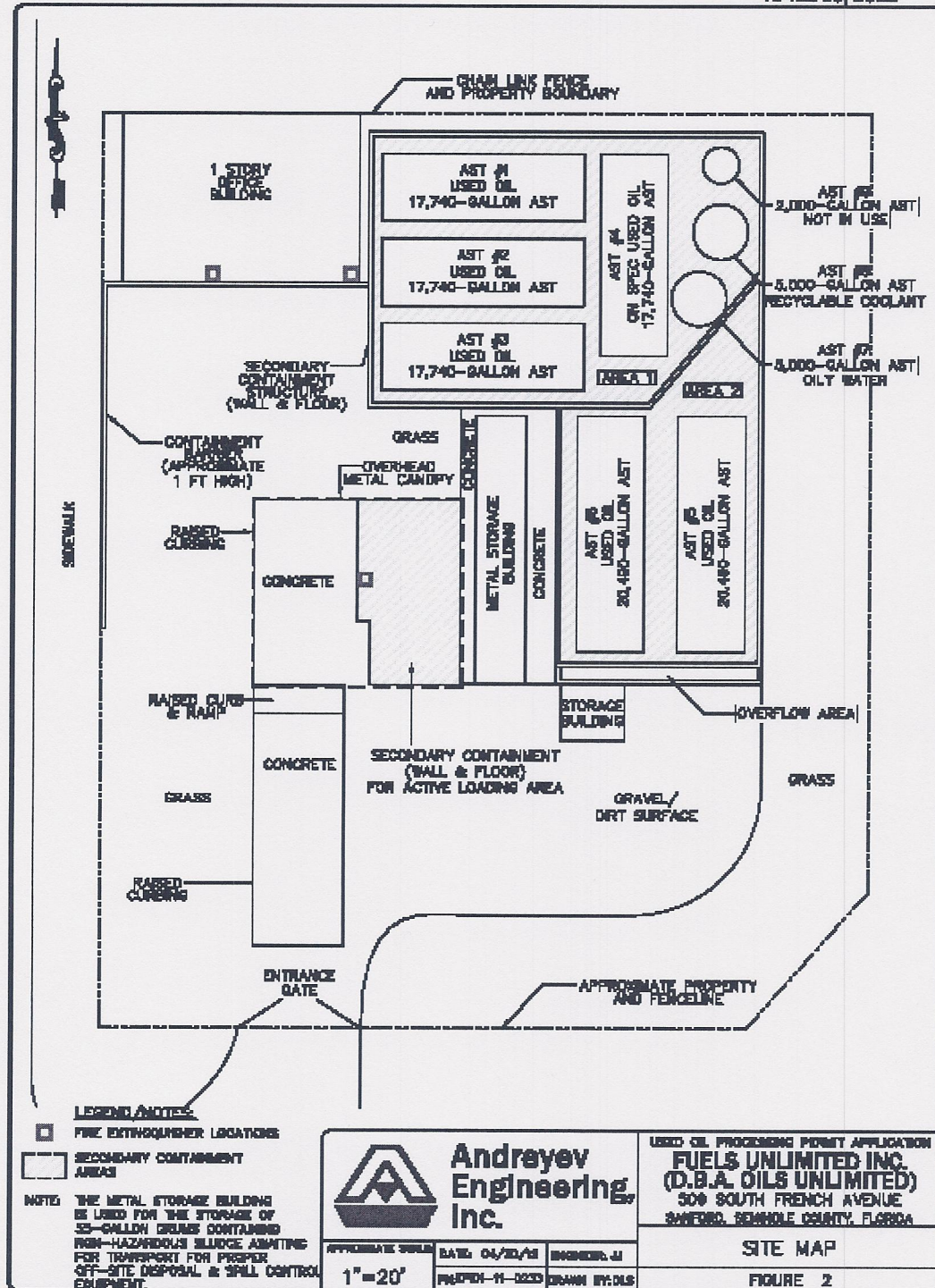
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# ATTACHMENT- A Site Map

*new  
revision  
sheet needed*

REVISION 1.0  
APRIL 30, 2012





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**ATTACHMENT B**  
**Tank Table**

<b>Tank Type</b>	<b>Size (gallons)</b>	<b>Date Installed</b>	<b>Product Type</b>
AST #1	<del>17,740</del> 17503	1920's	Used Oil
AST #2	<del>17,740</del> 17503	1920's	Used Oil
AST #3	<del>17,740</del> 17503	1920's	Used Oil
AST #4	<del>17,740</del> 17503	1920's	Used Oil
AST #5	<del>20,490</del> 20001	1981	Used Oil
AST #6	<del>20,490</del> 20001	1981	Used Oil
AST #7	<del>5,000</del> 5008	1998	Oily Water
AST #8	<del>5,000</del> 5008	1998	Recyclable Coolant