From: Kothur, Bheem
To: Mayberry, Eric
Subject: FW: FCC Response to NOD- Plant City Used Oil Permit
Date: Wednesday, August 21, 2013 10:17:03 AM
Attachments: FDEP_PC_UO_Proc_updated_pages_two_8_21_13.pdf

Hi Eric,
Please insert the attachments and the e-mails into OCULUS under permit application related documents.
The facility I.D: FLD 065 680 613
Subject: Revised NOD Responses

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

From: Crandall, Scott [mailto:scott.crandall@fccenvironmental.com]
Sent: Wednesday, August 21, 2013 10:09 AM
To: Kothur, Bheem; Knauss, Elizabeth
Cc: Glorioso, Vinnie; Pousa, Angelo
Subject: RE: FCC Response to NOD- Plant City Used Oil Permit

Bheem

Attached are the revision.

Scott

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Wednesday, August 21, 2013 7:56 AM
To: Crandall, Scott; Knauss, Elizabeth
Cc: Glorioso, Vinnie; Pousa, Angelo
Subject: RE: FCC Response to NOD- Plant City Used Oil Permit

Hi Scott,
Thanks for taking care of this discrepancy very promptly.
As you know, once I receive the revised pages to the application then the renewal application is called complete.
Then I will send the Courtesy Draft Permit very shortly for your review and any comments.

Bheem

From: Crandall, Scott [mailto:scott.crandall@fccenvironmental.com]
Sent: Tuesday, August 20, 2013 5:01 PM
To: Kothur, Bheem; Knauss, Elizabeth
Cc: Glorioso, Vinnie; Pousa, Angelo
Subject: RE: FCC Response to NOD- Plant City Used Oil Permit

Beth/Bheem

I am in agreement with Beth's wording regarding comment 15. We will revise to: *FCC Samples our finished oil tank, 552, daily per the requirements to make on –specification used oil claims pursuant to 40 CFR 279.11. Additional analyses may be conducted to meet customer specifications*.

I understand your comment now that it is our client's obligation to provide the fuel parameter but they often rely on our analytical.

We will also make the changes with the District new phone and fax.
I will get you these revised pages tomorrow
Thanks

Scott Crandall, PE
Director of EH&S & Risk Management
813-335-5341

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Tuesday, August 20, 2013 4:22 PM
To: Crandall, Scott
Subject: FW: FCC Response to NOD- Plant City Used Oil Permit

Hi Scott,
Please give call to Beth or response to her comment ASAP.
And revise the document to her comment accordingly.
Thanks.
Bheem

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.
From: Knauss, Elizabeth
Sent: Tuesday, August 20, 2013 4:09 PM
To: Kothur, Bheem
Cc: McGinnis, Sean
Subject: RE: FCC Response to NOD- Plant City Used Oil Permit

I approve of most of the responses, except to items 15 and 21. For 21(and 22), the table should be revised to include the new District phone numbers as well. 813/470-5700 and 813/470-5993 (fax)

For 15. I disagree with the facility's contention that they do not sample their finished product for clean air act regulated fuel parameters. I have seen certificates of analysis that the processors provide to their customers.

FCC sells oil for fuel and non fuel uses. I agree we would not require oil sold for non fuel use to meet

Clean Air Act analytical requirements.

Fuel customers are either required to analyze the fuel themselves or obtain a certification from the fuel seller that the fuel meets the facility's limits for sulfur etc.

I would be OK with something like: FCC Samples our finished oil tank, 552, daily per the requirements to make on –specification used oil claims pursuant to 40 CFR 279.11. Additional analyses may be conducted to meet customer specifications.

An example condition taken from an air permit:

General Asphalt of Lakeland, LLC Air Permit No. 1050387-006-AO Operation Permit Revision Page 16 of 25

A.16. Asphalt Concrete Batch Plant Dryer Fuel Type Usage Recordkeeping - In order to determine compliance with Specific Condition No. A.11. the following records shall be kept:

a. If the last compliance test was conducted while the dryer was fired with natural gas, the permittee shall keep a daily record of dryer operating hours while firing on-specification reclaimed fuel oil and/or new No. 5 fuel oil, along with a cumulative total of on-specification reclaimed fuel oil and/or new No. 5 fuel oil dryer operating hours since the last dryer compliance test*.

*(*Permitting Note - When the operating hours of using on-specification reclaimed fuel oil and/or new No. 5 fuel oil in the dryer since the last compliance test exceed 400 hours, additional compliance testing is required (see Specific Condition No. A.11.).)*

b. If the last compliance test was conducted while the dryer was fired with on-specification reclaimed fuel oil, the permittee shall keep a daily record of dryer operating hours while firing new No. 5 fuel oil along with a cumulative total of operating hours using on new No. 5 fuel oil since the last dryer compliance test*.

*(*Permitting Note: When the operating hours of using new No. 5 fuel oil in the dryer since the last compliance test exceeds 400 hours, then additional compliance testing is required (see Specific Condition No. A.11.).)*

c. For each delivery of on-specification reclaimed fuel oil, the vendor shall provide an analysis documenting the on-specification fuel oil meets the requirements of Specific Condition A.3.

d. In order to document continuing compliance with the sulfur content limitation in Specific Condition No. A.3., in % by weight of the fuel oil, the permittee shall keep records on either vendor provided as-shipped analysis or on analysis of as-received samples taken at the plant. The analysis shall be determined by appropriate ASTM methods.

[Rules 62-4.070(3), 62-210.300(c)2.c., and 62-710, F.A.C.; Construction Permit 1050387-005-AC]

From: Kothur, Bheem

Sent: Thursday, August 15, 2013 11:34 AM
To: Knauss, Elizabeth
Cc: Tripp, Anthony; Eldredge, Susan F.
Subject: FW: FCC Response to NOD- Plant City Used Oil Permit

Hi Beth,
Attached are the NOD responses from the facility.
Please review and let me know whether the responses are adequate.
Thanks.
Bheem

From: Crandall, Scott [mailto:scott.crandall@fccenvironmental.com]
Sent: Thursday, August 15, 2013 11:19 AM
To: Kothur, Bheem
Cc: Glorioso, Vinnie
Subject: FCC Response to NOD- Plant City Used Oil Permit

Bheem
Attached is a pdf of our response to the NOD along with the requested revised Tank Table and revised Site Plan. You should receive 2 hardcopies tomorrow. I will also send a hardcopy to the District office.

thanks

Scott Crandall, PE
Director of EH&S & Risk Management
813-335-5341