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Oils Unlimited
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Oils Unlimited

April 15, 2015

RECEIVED

APR 20 2015

U.S. District

John White
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

Dear Mr. White:

As you know we are being investigated criminally by federal EPA investigators. Your warning letter is separate from the federal complaint yet they are related.

We are inundated in trying to respond to both allegations and would humbly ask to deal with your administrative actions upon resolving the federal issues.

We appreciate the gravity of the situation and can assure you we did not willfully receive or sell off-spec used oil.

Reference to off-spec oil by us previously was a colloquial mistake and made in ignorance of the specific regulatory definition of off-spec.

We have a bad habit of referencing to used oil as on-spec or off-spec. Our language will be corrected to use only terms defined in the regulations.

Attached is an outline of our revised operational procedure and would welcome your input and or comments.

We are aware that our previous record keeping is deficient and have corrected the same.

Regards,



Ronald C Patterson
Fuels Unlimited Inc dba Oils Unlimited

Enclosure: Oil Processing Procedures

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Oil Processing Procedures

- 1. All incoming oil is field tested for halogens.**
- 2. Upon arrival @ French Avenue plant incoming oil is placed in tank numbers 2 & 6 labeled "Used Oil". Tank 5 is separate and filled with "Used Oil" for testing by independent lab for compliance to on-specification criteria.**
- 3. Upon receipt of lab analysis the oil in tank 5 is now deemed on-spec and is moved to either Tanks 1, 3 and 4 which are labeled as such.**
- 4. All the above operations are recorded in a Used Oil tank log respectively and referenced to shipping manifests and lab analysis as well as date correlated.**
- 5. All on-spec tank operations are manifested and identified by lab analysis.**
- 6. All on-spec tank operations are entered into on-spec tank log as duplicated the Used Oil procedure.**
- 7. No off spec oil or hazardous wastes are to be accepted onto the premises. Should any incursion occur they shall be manifested and a company authorized to deal as such will be engaged for legal disposition.**

All incidents will be logged as to quantity, date and particulars.