



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

April 7, 1998

Frances Braaksma, President  
Florida Waste Environmental Services, Inc.  
5218 St. Paul Street  
Tampa, Florida 33619

**RE: Florida Waste Environmental Services, FLR 000 013 888  
Operating Permit Application 76517-HO06-001  
Extension of Time to Respond to First NOD**

Dear Ms. Braaksma:

The Department has received your letter, dated March 12, 1998 and received on March 16, 1998, requesting an extension in submitting your response to the First Notice of Deficiency (NOD). Based upon your request above and the meeting held on March 30, 1998, the request is granted. The Department agrees to a submittal date of July 3, 1998.

The processing of the Florida Waste Environmental Services (FWES) application creates certain problems for the Department. Rule 62-710, Florida Administrative Code (FAC), as it currently exists, does not have any specific provisions for the permit application processing of a used oil processing facility that has not been constructed. The Department has determined that two options are available:

- 1) FWES can submit a written waiver of the Department permit processing time clock, construct the processing and storage units, then restart the permitting time clock. This option will mean that the units cannot receive used oil until after the used oil processing permit is issued by the Department.
- 2) FWES can develop the facility standard operating procedures and attachments in response to the First NOD. When the application is as complete as it can be before construction, the Department will prepare a permit that would address the construction. The permit will have conditions that require submittal of plans and other details as they become available during the construction of the processing facility. The permit will also have conditions that will require FWES to submit final drawings and an engineering assessment when the processing and storage units are completed. The submittal of the final drawings and the engineering assessment will be considered a permit modification and will require a modification fee. This option will allow FWES to operate as a used oil processing facility while the permit modification is being processed by the Department.

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The selection of either option described above is left to FWES. Should you have any questions concerning this matter, please contact me at the letterhead address or call (813)744-6100, extension 390.

Sincerely,



Stanley Tam  
Professional Engineer II  
Hazardous Waste Section

ST:st

cc: Raoul Clarke, FDEP - Tallahassee  
Satish Kastury, FDEP - Tallahassee