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November 14, 2017

VIA E-MAIL (bryan.baker@dep.state.fl.us)

Bryan Baker, P.G.,
Environmental Administrator
Hazardous Waste Program and Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road; MS 4560
Tallahassee, FL 32399-2400

Re: Florida Recycling Solutions, LLC Permit Modification
for removal of Tank 8 for transfer to Aqua Clean Environmental Co., Inc.
in Lakeland, Polk County, Florida
FDEP Permit Nos.: 294693-HO-004 and 294693-SO-003

Dear Mr. Baker:

Pursuant to our recent telephone conversations, enclosed please find the documentation prepared by and on behalf of Florida Recycling Solutions, LLC ("FRS") for the transfer of Tank 8 from the used oil processing facility to Aqua Clean Environmental Co., Inc. The final Closure Report and transfer documentation was submitted to the Department on September 28, 2017, however, we recently learned that Mr. Bheem Kothur is on extended leave. Therefore, you requested that re-submit this information to your attention at the Department's offices in Tallahassee.

I believe you will find the enclosed Closure Report and additional documentation consistent with our prior discussions and the proposed course of action for transfer of Tank 8 from FRS to Aqua Clean as set forth in my correspondence to the Department dated May 31, 2017 (copy enclosed). We would appreciate the Department expediting its final review and approval of the Closure Report and the transfer of Tank 8 from FRS to Aqua Clean. In the

Bryan Baker, P.G.
November 14, 2017
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interim, please do not hesitate to contact me should you have any questions regarding the above matters or if the Department requires any additional information.

Sincerely yours,

BUCHANAN INGERSOLL & ROONEY PC



Ron H. Noble

cc: Mr. Mike Zellars (via e-mail mszellars@acelkd.com)

Enclosures

4845-3045-6917, v. 1

Noble, Ron

From: Mike Zellars <mszellars@acelkd.com>
Sent: Thursday, September 28, 2017 8:48 AM
To: Bheem.Kothur@dep.state.fl.us
Cc: Noble, Ron; Knauss, Elizabeth; justin_winn@doh.state.fl.us
Subject: Tank 8 Closure letter

Dear Mr. Kothur,

Please accept the following as Florida Recycling Solutions Tank 8 closure report.

On August 25th, a small volume not exceeding 60 gallons of on specification used oil was transferred from tank 8 to FRS tank 7 in preparation for Tank 8 closure.

On August 28th, Maintenance and Machinery Erectors, Inc., initiated construction of the re-piping work as shown in the submitted drawings previously provided. The purpose of this piping work was to:

1. Disconnect any and all piping and fittings connected into the FRS system.
2. Run new piping so tank 8 could be transferred to the ACE water treatment system.

Maintenance and Machinery Erectors, Inc. finished all changes per the previously submitted drawing on September 1, 2017.

On September 2, 2017, the manway to Tank 8 was opened and a small amount (approx. 20 gallons) of remaining on-specification used oil not previously transferred was transferred to FRS tank 7. There were no solids or "tank bottoms" found in tank 8, therefore no sampling was conducted.

On September 5th, 2017, the manway was put back on tank 8 and it is ready to be used for ACE water treatment.

I would like to thank the Department for their assistance in removing tank 8 from the FRS permit.

If you have any questions, please do not hesitate to contact me.

Sincerely

Mike Zellars
Vice President/Director, FRS & Aqua Clean Environmental co. Inc.

Noble, Ron

From: Mike Zellars <mszellars@acelkd.com>
Sent: Wednesday, November 01, 2017 2:32 PM
To: Noble, Ron
Subject: FW: Tank 8 Closure/Reassignment
Attachments: Bheem Kothur LETTER 05-31-17 (4845-1747-4377 v1).pdf

From: Mike Zellars
Sent: Tuesday, June 20, 2017 8:52 AM
To: Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>; justin_winn@doh.state.fl.us
Cc: Noble, Ron <Ronald.Noble@bipc.com>
Subject: Tank 8 Closure/Reassignment

Dear Beth and Justin,

Per the attached closure/reassignment plan and instructions of notifications to be made, I am providing notification that the closure/reassignment procedures of Tank 8 back to Aqua Clean will begin on 6/28/17. Of course, I will keep documentation of the process which will be included in the final report. I expect the reassignment to take about 30 days but not more than 60.

If you have any questions, please do not hesitate to call me. Also, please reply back to this email that you have received this so I can make sure the email found its way to you. Thanks.

Sincerely,

Mike

Ron H. Noble
Direct Dial: 813 222 1175
ronald.noble@bipc.com

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May 31, 2017

VIA E-MAIL ONLY bheem.kothur@dep.state.fl.us

Mr. Bheem R. Kothur, P.E., DEE
Hazardous Waste Program and Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road; MS 4560
Tallahassee, FL 32399-2400

Re: Florida Recycling Solutions, LLC Used Oil Facility Operating Permit Minor
Modification for Removal of Tank 8 for transfer to Aqua Clean Environmental
Co., Inc. in Lakeland, Polk County
FDEP Operating Permit Nos.: 294693-HO-004 and 294693-SO-003

Dear Mr. Kothur:

The purpose of this submittal is to provide the Department the requested information for the minor modification of the Florida Recycling Solutions, LLC's ("FRS") Used Oil Facility Operating Permit to remove Tank 8 from the permitted FRS facility and transfer and return Tank 8 back to Aqua Clean Environmental Co., Inc. ("Aqua Clean"). Tank 8 is a 30,000 above-ground storage tank located in secondary containment that is used to store finished used oil that has been processed by FRS. Tank 8 currently stores on-specification used oil for sale to third parties by FRS, and when this tank is transferred back to Aqua Clean, it will be utilized in the Aqua Clean industrial wastewater pretreatment plant. Tank 8 was historically utilized and operated by Aqua Clean prior to the permitting and construction of the FRS used oil processing facility.

Pursuant to the Closure Conditions of Part VI of the Permit, the "permitted facility" is not closing, and therefore, the majority of the Closure Conditions of the Permit are not applicable to

the transfer of Tank 8 from FRS back to Aqua Clean. Specifically, the only Closure Conditions applicable to the Tank 8 closure and transfer to Aqua Clean are as follows:

1. Remove and properly handle or dispose of the Tank 8 contents. Tank 8 is used to store finished oil that has already been processed and determined to be on-specification. This oil will be sold to a third party as opposed to disposal.
2. Tank 8 will be rendered "empty" by removing all of its used oil contents to less than one inch of residuals remaining in the bottom of the tank. Because Tank 8 has never been used to store hazardous wastes, our understanding is Tank 8 does not have to be triple rinsed. FRS does not expect to encounter or produce any residue or sludge from the Tank 8 closure because it has been used to store finished oil. If sludges are identified or generated during the Tank 8 closure from the bottom of the tank, any such sludges will be properly characterized and handled accordingly; and
3. The Tank 8 Closure Report submitted to the Department will address the specific issues and action items set forth above, but not the remaining Closure Conditions of the Permit which are not applicable to the closure and transfer of Tank 8.

Because Tank 8 was constructed and located within secondary containment, the closure requirements of Rule 62-762.801(4) are not applicable or required. Because Tank 8 is currently registered with the Department's Storage Tanks Program, the Polk County Storage Tank Program will be notified of the Tank 8 closure activities pursuant to the provisions of Rule 62-762.451(1)(b)2, F.A.C. Specifically, within 30 days after completion of the Tank 8 closure, FRS will provide the Polk County Storage Tanks Program an updated Storage Tank Registration Form 62-761.900(2) confirming the closure and transfer of Tank 8 from the permitted facility. When Tank 8 is transferred back to Aqua Clean, Tank 8 will no longer be a registered or regulated storage tank pursuant to Chapter 62-762, Florida Administrative Code.

Upon approval of the Permit Minor Modification by the Department, FRS will submit a Closure Report to the Department providing the pertinent information and any sampling or test results that are generated, if any, in the course of this project. Attached to this submittal please find two figures which identify the re-piping and retrofitting of the FRS and Aqua Clean facilities to remove Tank 8 from the permitted FRS facility and transfer same to the Aqua Clean Industrial Wastewater Pretreatment Plant. The schedule to perform the Tank 8 closure is as follows: After the Department approves in writing the Tank 8 closure proposal set forth herein, FRS will commence the Tank 8 closure activities and complete same within 60 days. Upon completion of the Tank 8 closure, FRS will submit a Closure Report to the Department within 30 days after project completion. Upon review and approval of the Tank 8 Closure Report, the Department will then modify the Used Oil Facility Operating Permit to remove Tank 8 from the Permit.

We understand there are no application or other fees applicable to the minor modification of the above-referenced Permit. I want to thank the Department in advance for its assistance and cooperation in the timely processing of this minor modification. In the interim, please do not

Mr. Bheem R. Kothur, P.E., DEE

May 31, 2017

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hesitate to contact me should you have any questions regarding the above matters or if the Department requires any additional information.

Sincerely yours,

BUCHANAN INGERSOLL & ROONEY PC

A handwritten signature in black ink, appearing to read "R. Noble", written in a cursive style.

Ron H. Noble

cc: Mr. Mike Zellars (FRS) (via e-mail mszellars@acclkd.com)
Mr. Bryan Baker, (FDEP) (via e-mail bryan.baker@dep.state.fl.us)
Ms. Beth Knauss (FDEP) (via e-mail Elizabeth.Knauss@dep.state.fl.us)

Enclosures

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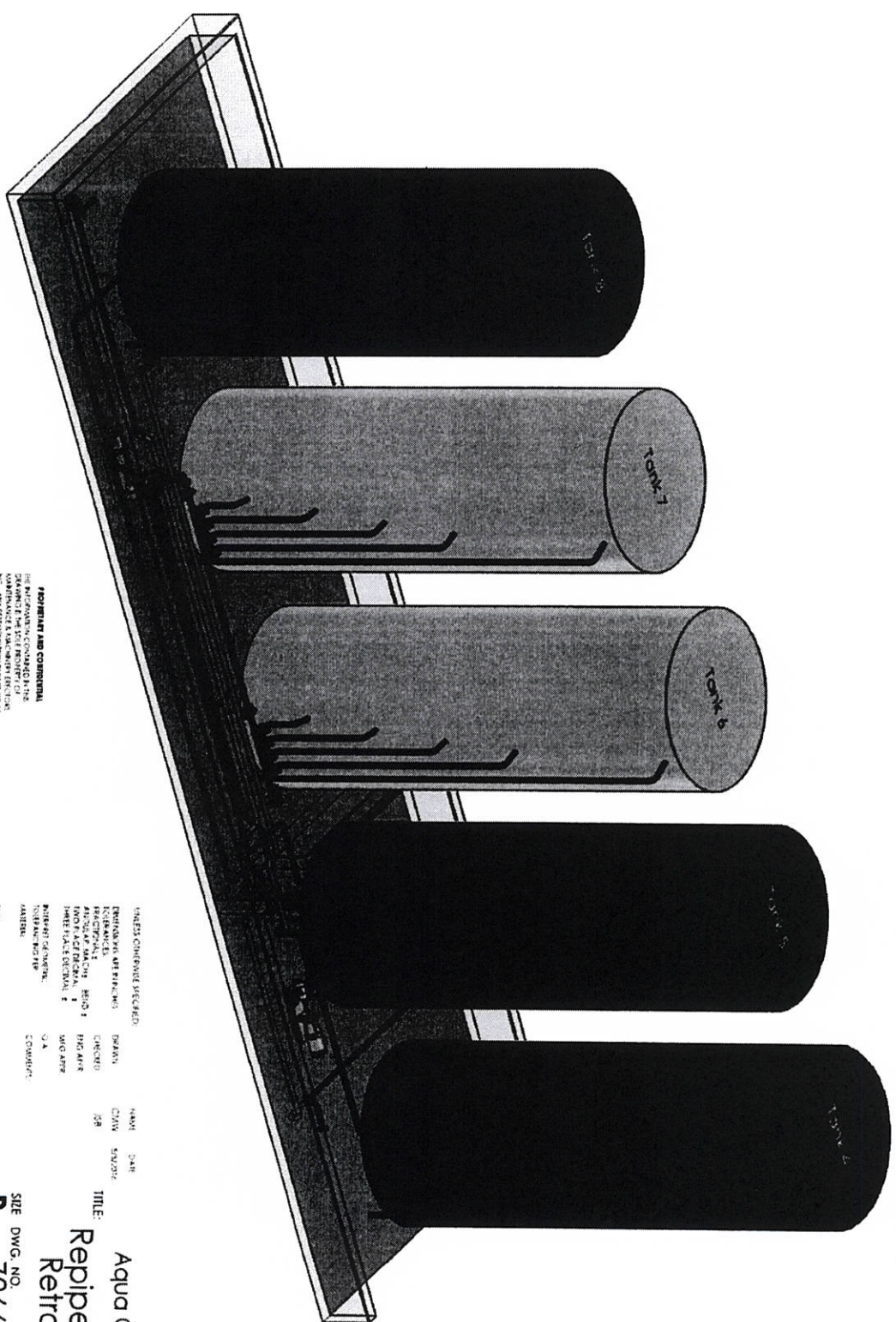
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