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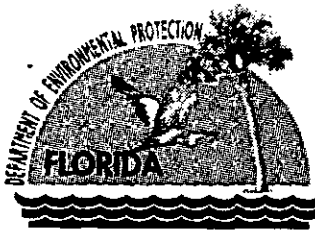
Mr. Mark Owens

Street, Apt. No., or PO Box No.

1819 Albert Street

City, State, ZIP+4

Jacksonville Florida 32202



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

September 13, 2005

## CERTIFIED - RETURN RECEIPT

7000 0600 0026 4130 8203

Mr. Mark Owens, P.E.  
Plant Manager  
Water Recovery, Inc.  
1819 Albert Street  
Jacksonville, Florida 32202

Subject: WRI used oil processing permit, renewal application dated August 4, 2005,  
Notice of Deficiencies (NOD), EPA ID No: FLR 000 069 062


Dear Mr. Owens:

The Hazardous Waste Regulation Section of the Florida Department of Environmental Protection (FDEP) has reviewed the renewal application for your used oil facility. The renewal permit application remains incomplete. Please see the attachment for comments.

Pursuant to Section 120.60 (2), Florida Statutes (F.S.) the Department may deny an application if the applicant, after receiving timely notice, fails to correct errors or omissions or supply additional information within 30 days.

If you have any questions on used oil issues or if you would like to set up a meeting to discuss these issues at your convenience, please contact Rabin Prusty at (850) 245-8780 or Bheem Kothur at (850) 245-8781.

Sincerely,

  
Doug Outlaw, Professional Engineer III  
Hazardous Waste Regulation

Enclosure:

cc: Raoul Clarke, DEP Tallahassee  
Ashwin Patel, DEP/Jacksonville  
Fred Wick, DEP/Tallahassee

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ATTACHMENT  
September 13, 2005

1. The existing permit lists WRI's EPA identification number incorrectly. WRI should ensure that the correct identification number FLR 000 069 062 is included in the application for renewal of the permit. The EPA ID Number FLD 101 877 876 is for DLAC/WRI LLC (the RCRA Closure Site). Additionally, WRI should review all manifests, documents and other related items to ensure that the correct EPA identification number is listed.
2. At the time of the last CEI, WRI was accepting used oil filters from various off-site locations. WRI was not registered as a used oil filter transfer facility. This was in violation of Rule 62-710.850 (4), Florida Administrative Code (F.A.C.) and Specific Condition Part III (2) of permit number 79677-002-HO. Subsequent to the inspection, WRI notified the Department that they are operating a used oil filter transfer facility. WRI should update the facility operation description to include this activity.
3. There may be some additional changes to the permit which WRI suggested as a result of the August 9, 2004 CEI findings. We could not find any of these changes in our file. WRI may have a record of such proposed changes. Please provide these changes.
4. DEP has sent a letter dated August 26, 2005 requesting the facility to submit the closure cost estimates with respect to Rule 62-710.800. Please provide the detailed closure cost estimates and proof of financial assurance. This must be provided within 60 days after approval of cost estimates by the Department.