

September 22, 2005

Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Attention: Bheem Kothur

RECEIVED

RCRA

SEP 29 2005

Hazardous Waste Regulation

Subject: **Water Recovery, Inc.**
Used Oil Processor Permit Number 79677-002-HO
Facility Permit Renewal – Response to Notice of Deficiencies (NOD)

Dear Mr. Kothur,

In response to your September 13 letter stating that our permit application remains incomplete, Water Recovery, Inc. (WRI) is submitting the following additional information. This information will follow the general outline of the attachment of your letter.

1. The existing permit lists WRI's EPA identification number incorrectly. The original permit application was submitted prior to the issue of the new number (FLR000069062). Because of this, all of the existing permit documentation has the old number on it. I left the number the same for continuity, but I certainly agree that it should be changed. Over the years, we have always been careful to use the new number. I also did a database review and spot-checked the hard copy files to make sure that the old number did not show up anywhere. To correct the problem, I am submitting a revised application form (Part II – Certification) with the correct identification number (attached).
2. At the time of the last CEI, WRI was registered as a used oil filter processor, but not a used oil filter transfer facility. I thought that 'processor' was inclusive of 'transfer facility'. I apologize for this oversight. WRI modified its used oil registration immediately after the CEI to correct the problem. WRI has prepared revision text to update the facility operation description to include this activity. These revisions, including one for the 'Operating Information' section and one for the 'Used Oil Process Flow Plan' are provided on the attached revision page.
3. WRI made some corrective actions in response to the last CEI. These included a set of manifest guidelines as well as some procedures for ensuring that WRI's used oil transporters are all certified. While these new guidelines and procedures do not contradict any part of the existing permit, they should be included in it to increase the level of detail. WRI has prepared revisions to be added to the Used Oil Permit under

1819 Albert Street
P.O. Box 330569

Jacksonville
FL 32233-0569

Fax (904) 475-9449

Tel (904) 475-9320

Used Oil Tracking Plan. These revisions are also provided on the attached revision page.

4. WRI has received FDEP's letter dated August 26, 2005 and will begin the process of estimating closure costs soon.

Please let me know as soon as possible if the above information does not complete our application. If you have any questions please do not hesitate to call me at (904) 475-9320 or e-mail at mowens@wrijax.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'Mark Owens', followed by a long horizontal line.

Mark Owens, P.E.
Plant Manager
Water Recovery, Inc.

Water Recovery, Inc.
Used Oil Processor Permit Number 79677-002-HO
Facility Permit Renewal – Response to Notice of Deficiencies (NOD)
Attachment 1 – Revised Application Form (Part II Certification)

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification	XXX	_____ Recertification
1. DEP Facility ID Number: <u>FLR 000069062</u>	2. Tank Numbers: <u>1P,2P,3P,4P,5P,6P,7P,8P,9P,10P</u>	
3. Facility Name: <u>Water Recovery, Inc.</u>		
4. Facility Address: <u>1819 Albert Street, Jacksonville, FL 32202</u>		

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature _____

Mark Owens

Name (please type) _____

Florida Registration Number: 54966

Mailing Address: 1819 Albert Street

Street or P. O. Box
Jacksonville, FL 32202

City _____ State _____ Zip _____
Date: _____ Telephone **(904) 475-9320**

[PLEASE AFFIX SEAL]



Water Recovery, Inc.
Used Oil Processor Permit Number 79677-002-HO
Facility Permit Renewal – Response to Notice of Deficiencies (NOD)
Attachment 2 – Revisions

1. Modify the last paragraph of the first page of (C) Operating Information to the following:

‘The nature of the WRI business is to (1) receive, store, process, treat and market used oil, (2) manage, **transfer**, and process used oil filters, (3) receive, store, process, treat and discharge industrial wastewater, (4) receive, store, process and treat petroleum contact water (PCW) and (5) receive, store, process, treat and market fuel products. This permit application does not address the treatment of industrial wastewater or fuel products.’

2. Modify Section 2.4 – Other Processing of the Used Oil Process Flow Plan to the following:

“Used oil filters will be processed by crushing the filters to remove the used oil. The spent filter material will either be recycled or shipped to a permitted solid waste landfill. Used oil residuals will be received and consolidated or shipped directly off site to a reccycling faciility or a premitted solid waste landfill. The original shipping container will be cleaned in accordance with 40 CFR Part 261.7. **In some cases, WRI may ship the uncrushed filters to another permitted facility acting only as a used oil transfer facility.** The WRI Used Oil Facility does not plan to conduct any other used oil processing tht the present time. Should other processing become necessary, this section will be revised.”

3. Modify Section 2.0 – Description of the Used Oil Tracking Plan to add the following paragraph directly after the first paragraph of the section.

“WRI will accept used oil loads on a nonhazardous waste manifest. All nonhazardous waste manifests will be competed according to the attached Manifest Completion Guidelines.”

Also, please add the included Manifest Completion Guidelines at the end of the Used Oil Tracking Plan.

Water Recovery, Inc.

Manifest Completion Guidelines

November 17, 2004

Introduction

Proper completion of the manifest is the legal responsibility of the generator. In practice, the generator usually depends on either WRI (the disposal facility) or the transporter (such as MER) to prepare the manifest for them. When WRI prepares the manifest all appropriate sections will be completed. In cases where WRI accepts a shipment of waste on a manifest prepared by another company, certain minimum information is required. If a required piece of information is missing, the shipment will be held until the generator (or their agent) can be contacted and the missing information is retrieved. In many cases, WRI personnel will need to make a modification to a manifest based on a discussion with the transporter or the generator. In these cases, the change should be initialed and noted in the discrepancy indication space (Box 19).

Specific Guidelines

The following provides completion guidelines and requirements for each box on a nonhazardous manifest (Keller 12-BLS-C5 Rev 12/98):

1. Generator's US EPA ID No. – This is the facility-specific EPA ID number of the generator. This section needs to be completed where possible, but not all facilities generating waste (wastewater or used oil) will have one. If WRI is dealing directly with the generator, we will ask for this information prior to preparing the manifest. If another company is bringing us the waste on behalf of the generator, we will make a reasonable amount of effort to retrieve this information, but leave it blank if it is unavailable.
2. Manifest Doc No. – This is optional. WRI has a unique numbering system for all the manifests that we prepare. Many of our customers (MER mainly) also have numbering systems.
3. Generator's Name and Mailing Address – This is very important and required information. Note that it refers to mailing address and not site address.
4. Generator's Phone Number – Also required.
5. Transporter 1 Company Name – Also required.
6. Transporter 1 EPA ID Number and Phone Number – The phone number is required for all waste shipments. The EPA ID number is required for all used oil shipments (including PCW). For non used oil shipments, the EPA ID number will be completed when the transporter HAS an EPA ID number. Almost all of the transporters that WRI uses have one. Only very small or independent hauling companies (which do not transport used oil) would not have an EPA ID number.
7. Transporter 2 Company Name – Required if the transportation was completed by two transporters.

8. Transporter 2 EPA ID Number – To be completed when the transportation was completed by two transporters. Same requirements as #6 above.
9. Designated Facility Name and Site Address – For all inbound shipments, this section will be completed with the following information:

Water Recovery, Inc.
1819 Albert Street
Jacksonville, FL 32202

For outbound shipments, this section will be completed with the destination facility name and the physical address.

10. Facility EPA ID Number and Phone Number – For incoming shipments this section will be completed with WRI's ID #: FLR000069062. For outbound shipments, this section will be completed with the EPA ID Number of the receiving facility. The phone number of the receiving is required in all instances.
11. Waste Shipping Name and Description – The description in this space must reasonably fit with the description used on the waste profile. Very general descriptions such as 'used oil' and 'nonhazardous industrial wastewater' are acceptable, but more specific descriptions such as 'crankcase oil' and 'contaminated stormwater' are preferred. Note that the term 'nonhazardous' is not appropriate for used oil or PCW loads. Completion of this field is required for all shipments.

There are additional lines such that multiple materials can be shipped on the same manifest. Also, there is a space for additional descriptions and another for waste handling codes. The WRI approval number can either be listed here or in Box 15 – Special Handling. A valid WRI approval number is required for acceptance of any waste shipment.

12. Containers – Note the number and type of containers. The two most common types are 'TT' for tanker truck and 'DM' for drum. Completion of this field is required
13. Total Quantity – This information is required.
14. Unit – Gallons, pounds, tons, etc. This information is required.
15. Special Handling – Additional information about the waste goes here. Also, the emergency response number should be listed here. WRI will add the result of our fingerprint analyses in this section (pH, TOX, Flash, etc.) as well as the time in and time out of the truck.
16. Generator's Certification – A legible name, a signature and a date are required.
17. Transporter 1 – A legible name, a signature and a date are required.
18. Transporter 2 – A legible name, a signature and a date are required for shipments that used two transporters.
19. Discrepancy Information – If WRI is the receiving facility and there are any discrepancies in the above portions of the manifest that required changing, they should be indicated here and initialed.
20. Facility Owner – This signature certifies that the waste material were received as per the information on the manifest. For waste shipments received by WRI, the person signing in this space is responsible and accountable for the completeness of the manifest.