

## Thursby, Kim

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**From:** Kothur, Bheem  
**Sent:** Friday, January 27, 2023 10:16 AM  
**To:** Thursby, Kim  
**Cc:** Kothur, Bheem  
**Subject:** FW: January Environmental Services, Inc - FLD 982 162 943  
**Attachments:** Closure Plan Revision 1\_esign.pdf

Hi Kim,

Please accept the below response for the consultant, Geo-Tech, for our Epost on January 24, 2023.

Thanks,

Bheem

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**From:** Nilesh Lakhani <Neil@geotech-usa.com>  
**Sent:** Thursday, January 26, 2023 12:03 PM  
**To:** Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; Pedigo, Leslie <Leslie.Pedigo@FloridaDEP.gov>; Bahr, Tim <Tim.Bahr@FloridaDEP.gov>  
**Cc:** cris@januaryservices.com; Chris@globalenviroteam.com  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

### EXTERNAL MESSAGE

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Good morning Mr. Kothur,

Thank you for taking the time to speak with me regarding the FDEP letter dated 1/24/23 relating to the comments of the Closure Plan prepared by GeoTech dated 12/30/22. GeoTech has addressed the changes in the attached Closure Plan Revision 1 for FDEP review and approval. I am hopeful that the FDEP will expedite its review.

In addition, GeoTech and Permittee are requesting FDEP to address the following:

1. Why the Closure Plan cannot be implemented before receiving the Consent Order (CO)? The CO is a finalization of formal administrative enforcement process while implementing Closure Plan is a permitting process which the Permittee is required to perform under its permit conditions. As indicated from the very beginning, Permittee has shown full cooperation to move forward with implementing facility closure as required in the two permit conditions. What liability or environmental harm is it causing the FDEP or the planet if we are to perform Closure?
2. On October 20, 2022, GeoTech and Permittee notified FDEP our intent to not renew the permits, why has it taken the Department over three months to prepare the Consent Order, which we still do not have, nor do we know what it really entails?. When should we get the CO??
3. The Permittee and GeoTech are presuming the CO relates to the Permittee not submitting the financial responsibility information for 01/25/2019 to 04/28/2020 and Certification of Financial Responsibility Form Part P forms for the coverage periods of 01/25/2019 to 04/28/2020 and for 04/28/2020 to 01/25/2021. If such is the case, please be informed that the Permittee has requested its insurance company to deliver these documents to FDEP today certainly before receiving final closure certification from FDEP. Then why hold the Permittee hostage from implementing facility closure as described in the Closure Plan?

The Property Owner is selling the property on February 17, 2023 to a buyer who will be conducting the same activity and ready to apply for permits as stipulated in the two permits issued to the Permittee. Kindly answer the above so we know the direct we should take.

If you have any questions regarding this email, please do not hesitate to call or email me directly at the contact information below.

May All Beings Be Happy



**Neil Lakhiani**  
**Director/Broker**  
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---

**From:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>  
**Sent:** Monday, December 12, 2022 9:56 AM  
**To:** Nilesh Lakhiani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>; Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>  
**Cc:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>;  
[cris@januaryservices.com](mailto:cris@januaryservices.com); [Chris@globalenviroteam.com](mailto:Chris@globalenviroteam.com); Steve MacLaren <[stevem@steppsabc.com](mailto:stevem@steppsabc.com)>; Tom Putnam  
([tom@globalenviroteam.com](mailto:tom@globalenviroteam.com)) <[tom@globalenviroteam.com](mailto:tom@globalenviroteam.com)>  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Neil,

I believe Friday, December 16<sup>th</sup> at 10AM will work best for the Department.

Thank you,

Michell



**Michell Mason Smith**  
***Environmental Administrator***  
Division of Waste  
Florida Department of Environmental Protection  
Hazardous Waste Program & Permitting  
[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)  
Office: 850-245-8721

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**From:** Nilesh Lakhiani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>  
**Sent:** Monday, December 12, 2022 7:48 AM  
**To:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>  
**Cc:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>;

[cris@januaryservices.com](mailto:cris@januaryservices.com); [Chris@globalenviroteam.com](mailto:Chris@globalenviroteam.com); Steve MacLaren <[stevem@steppsabc.com](mailto:stevem@steppsabc.com)>; Tom Putnam ([tom@globalenviroteam.com](mailto:tom@globalenviroteam.com)) <[tom@globalenviroteam.com](mailto:tom@globalenviroteam.com)>; Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>

**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

**EXTERNAL MESSAGE**

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Hi Leslie,

On behalf of January Environmental Services, Inc. (Client/Permittee), GeoTech Environmental, Inc. (GeoTech) greatly appreciates your and David Petti's valuable time on meeting with me, Chris Sappington, and Tom Putnam, Owners/Partners of Global Environmental and Response, LLC (Purchasers) on Friday, December 9, 2022. It is refreshing to learn that we share a similar background and common goals, which is for FDEP is to minimize threat to human health, safety, and the environment, for the Permittee to exit the facility without further expense and liability, for the Purchaser to gain economic opportunity while assuring the Lender it is worth taking the risk to finance the acquisition, and for GeoTech to represent in full transparency the outcome that benefits all parties concerned.

The meeting with Florida Department of Environmental Protection - Southwest District (FDEP) was to conduct an inspection of the facility, assess the environmental risk areas where the used oil, used oil filters, non hazardous wastewater were stored that include the six (6) registered 24,000-gallon single-walled Aboveground Storage Tanks (ASTs; TK 101 thru TK 106)) for the storage of used oil, two (2) 5,600-gallon single-walled ASTs blending tanks (BT 301 & 302) previously used for processing activities such as blending used oil with virgin petroleum products, one 200-gallon double-walled AST containing used oil, and the waste storage area inside the Warehouse that was used to store used oil drums (prior to pump out to ASTs), used oil filters, used oil absorbents, and petroleum contact water (PCW), including the secondary containment areas, sumps, and the associated piping. Please note that the bulk transport tankers (5,500-gallon capacity and one 3,200-gallon capacity) previously utilized by Permittee to collect used oil or oily water from outside vendors were not onsite. A 20,000-gallon single-walled AST (TK-107/green tank) was erected in circa 2015, but no product was ever placed inside it, not connected, not registered, thus never utilized and is at the site. Another tank, a single-walled 20,000 gallon (TK-108) also never installed was observed on the ground just west of Tank TK-107. Further, the rail cars containing used oil have not been at the premises for several years.

Regarding the site inspection, GeoTech notified FDEP that Permittee had removed all used oil from TK-101 thru TK-106, one 200-gallon AST and upon GeoTech's conversation with Mr. Cruz Torres, Permittee staff earlier in the morning, approximately, 6,500-gallon of used oil was being transported to the Permittee's facility in Oklahoma City. A copy of the waste manifest was sent via messaging to GeoTech, and a completed manifest will be provided this week, at the latest (see attached). The used oil filters and drums that were previously observed by FDEP in the Warehouse and during the April 2022 inspection were also in transit to the same facility. As indicated, all documentation will be shared with FDEP as soon as the final manifests are processed and complete by the Permittee. In summary, the ASTs 24-inch Manways were open and assessable for FDEP to inspect and confirm that majority of the used oil (less residual oily sludge) were pumped out. The inside of the warehouse was empty of drums/roll offs containing the materials previously stored and no evidence of discharge of used oil was noted inside the secondary containment areas, inside the warehouse floors, loading dock, and including the exterior areas such as the truck wagon area and/or the rail car area. Suffice to say that we all agree the risk of environmental contamination from the potential discharge of such products to the ground has been minimized at the facility. However, GeoTech will respectfully reserve to the FDEP findings as the final decision that will be forthcoming at your earliest convenience.

Now directing our attention to how the Permittee should close the two permits and the facility is summarized below. GeoTech looks forward to the FDEP input on this matter in the upcoming meeting tentatively proposed and requested by Ms. Smith this week (see below). We offer the following dates to consider: **Thursday, December 15, 2022, at 10 am or 2 pm**, or **Friday, December 16, 2022 at 10 am or 2 pm**. Ms. Michell Smith, kindly advise GeoTech what date and time suits FDEP.

Since time is of essence, and as part of our upcoming meeting discussion, GeoTech is summarizing our proposed activities and timelines below:

1. **Monday, December 19, 2022 – GeoTech to provide a written Closure Plan** per the Part III Closure Conditions of the Permit (including 40 CFR 279.54 & Rule 62-710.800(5), F.A.C) that will detail to FDEP how the facility will be closed so that there is no need for further maintenance. The Closure Plan will address the closing out of Permittee's Used Oil & Material Processing and Solid Waste Operating Permits. GeoTech will also include a Closure Activities Report and Time Schedule of Closure Implementation.
2. **Tuesday, December 27, 2022 - GeoTech requests the FDEP's assistance to expedite the review of the Closure Plan** for the proposed date so that we could address comments (if any) and begin its implementation in earnest and as stated below.



Based on our calendars, we would prefer to conduct the inspection in the morning and propose meeting at the facility at 9:30 a.m. Please let us know if the proposed time is acceptable.

Sincerely,



Leslie Pedigo  
Environmental Consultant  
Compliance Assurance Program  
Florida Department of Environmental  
Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
(813) 470-5870

---

**From:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>

**Sent:** Thursday, December 1, 2022 1:28 PM

**To:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>

**Cc:** [cris@januaryservices.com](mailto:cris@januaryservices.com); Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; [Chris@globalenviroteam.com](mailto:Chris@globalenviroteam.com); Steve MacLaren <[stevem@stepsabc.com](mailto:stevem@stepsabc.com)>

**Subject:** Re: January Environmental Services, Inc - FLD 982 162 943

**EXTERNAL MESSAGE**

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Good day Ms. Smith,

Thank you for your email and taking the time to assist GeoTech Environmental, Inc. (GeoTech) on this project. On behalf of January Environmental Services, Inc. (JESI/Permittee), GeoTech acknowledges receipt of your email message below.

The property owner, January Transport, Inc. (Owner) has engaged GeoTech Realty, Inc. (Brokerage) to sell the real property to Global Environmental and Industrial Response, LLC (Global/Purchaser). Global is located at 5014 N. 56<sup>th</sup> Street, Tampa, FL 33610 and provides environmental, industrial, and emergency response services to clients in Florida. The Purchaser has agreed to conduct used oil processing activities and operate the facility under the current permit conditions (Permit Numbers 00307171-004-HO & 00307171-005-SO) as issued to the Permittee. They have also agreed to engage GeoTech to facilitate the transfer of the said permits to them.

As a result, and to expedite this process, GeoTech/Brokerage is requesting FDEP assistance and clarification on the following concerns:

1. How the current permits fees already paid by JESI and issued for the permits 00307171-004-HO and 00307171-005-SO that are active (per Bheem Kothur with FDEP) should be transferred to the Purchaser.
2. Please provide specific documents, forms, or process(es) to transfer the said permits to the new purchaser, and release of financial assurance.
3. Should the sale occur to the Purchaser described above, GeoTech understands that a Closure Plan and certification of closure will not be necessary from JESI/purchaser.
4. Should the Purchaser not conduct used oil operations per the permits, GeoTech/JESI will comply with the FDEP notification prior to the scheduled date of closing the facility and after closing the facility, JESI shall submit a certification of closure completion. An updated Closure Plan and Schedule will be submitted to FDEP and prior to its implementation.

5. Regarding a phone call received from Ms. Leslie Pedigo, Environmental Consultant, FDEP SW District on Tuesday, November 28, 2022, requesting to conduct a site inspection, JESI has indicated that they are available to meet with FDEP on Friday, December 9, 2022 at 2:00 pm. Please advise me if this date and time is suitable for FDEP.

May All Beings Be Happy



**Neil Lakhani**  
Director/Broker  
Environmental Consulting & Commercial Real Estate Brokerage  
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**From:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>  
**Date:** Wednesday, November 16, 2022 at 4:16 PM  
**To:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>, loren.januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>, [cris@januaryservices.com](mailto:cris@januaryservices.com) <[cris@januaryservices.com](mailto:cris@januaryservices.com)>  
**Cc:** Bahr, Tim <[Tim.Bahr@FloridaDEP.gov](mailto:Tim.Bahr@FloridaDEP.gov)>, Boatwright, Kelley M. <[Kelley.M.Boatwright@dep.state.fl.us](mailto:Kelley.M.Boatwright@dep.state.fl.us)>, Boeshaghi, Teresa <[Teresa.Boeshaghi@dep.state.fl.us](mailto:Teresa.Boeshaghi@dep.state.fl.us)>, Vazquez, Pamala <[Pamala.Vazquez@dep.state.fl.us](mailto:Pamala.Vazquez@dep.state.fl.us)>, Walker, Kim (Waste) <[Kim.Walker@FloridaDEP.gov](mailto:Kim.Walker@FloridaDEP.gov)>, Petersen, Dane <[Dane.Petersen@FloridaDEP.gov](mailto:Dane.Petersen@FloridaDEP.gov)>, Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>, Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>, Petti, David <[David.Petti@FloridaDEP.gov](mailto:David.Petti@FloridaDEP.gov)>  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Mr. Lakhani,

The Department acknowledges receipt of your message below. Please be aware that pursuant to permits 00307171-004-HO and 00307171-005-SO and Chapter 62-710.800(5) F.A.C., (d) the owner or operator shall notify the Department in writing at least 60 days prior to the scheduled date of closing the facility and (e) Within 30 days after closing the facility, the owner or operator shall submit a certification of closure completion to the Department which demonstrates that the facility was closed in substantial compliance with the detailed closure plan.

Please respond to this message and provide the implementation status of the closure plan pursuant to Part III Conditions 1 through 9 of permits 00307171-004-HO & 00307171-005-SO.

Thank you,

Michell



**Michell Mason Smith**  
**Environmental Administrator**  
 Division of Waste  
 Florida Department of Environmental Protection  
 Hazardous Waste Program & Permitting  
[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)  
 Office: 850-245-8721

**From:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>  
**Sent:** Thursday, October 20, 2022 2:49 PM  
**To:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>  
**Cc:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; Green, Sarah <[Sarah.Green@FloridaDEP.gov](mailto:Sarah.Green@FloridaDEP.gov)>; Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>; Ciaravella, Philip <[Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov)>; Kromhout, Elizabeth <[Elizabeth.Kromhout@FloridaDEP.gov](mailto:Elizabeth.Kromhout@FloridaDEP.gov)>; Eldredge, Susan F <[Susan.Eldredge@dep.state.fl.us](mailto:Susan.Eldredge@dep.state.fl.us)>; loren januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; [cris@januaryservices.com](mailto:cris@januaryservices.com); Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

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Good afternoon Ms. Smith,

At the request of January Environmental Services, Inc. (JESI/Permittee), GeoTech Environmental, Inc. (GeoTech) is notifying the Florida Department of Environmental Protection (FDEP/Department) that JESI is withdrawing its interest in renewing the permit application to operate a Used Oil Processing Facility at the above mentioned site.

Further, JESI will not be conducting any operations per the Permit Numbers 00307171-004-HO & 00307171-005-SO issued by FDEP.

If you have any questions regarding this email, please contact me at (954) 347-8684 or via e-mail at [Neil@geotech-usa.com](mailto:Neil@geotech-usa.com).

May All Beings Be Happy



**Neil Lakhani**  
 Director/Broker  
 Environmental Consulting & Commercial Real Estate Brokerage  
 A: 12555 Orange Drive, Suite 4221, Davie, Florida 33330  
 P: 954 597 9100 M: 954 347 8684  
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**From:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>  
**Sent:** Wednesday, September 21, 2022 10:16 AM  
**To:** Nilesh Lakhlani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>  
**Cc:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; Green, Sarah <[Sarah.Green@FloridaDEP.gov](mailto:Sarah.Green@FloridaDEP.gov)>; Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>; Ciaravella, Philip <[Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov)>; Kromhout, Elizabeth <[Elizabeth.Kromhout@FloridaDEP.gov](mailto:Elizabeth.Kromhout@FloridaDEP.gov)>; Eldredge, Susan F <[Susan.Eldredge@dep.state.fl.us](mailto:Susan.Eldredge@dep.state.fl.us)>; loren januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; [cris@januaryservices.com](mailto:cris@januaryservices.com); Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Nilesh,

Your 30 day time extension request has been approved. January's response to the Second Request for Information is due on or by October 21<sup>st</sup>, 2022.

Thank you,

Michell



**Michell Mason Smith**  
*Environmental Administrator*  
Division of Waste  
Florida Department of Environmental Protection  
Hazardous Waste Program & Permitting  
[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)  
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---

**From:** Nilesh Lakhlani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>  
**Sent:** Friday, September 16, 2022 11:01 AM  
**To:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Cc:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>; Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; Green, Sarah <[Sarah.Green@FloridaDEP.gov](mailto:Sarah.Green@FloridaDEP.gov)>; Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>; Ciaravella, Philip <[Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov)>; Kromhout, Elizabeth <[Elizabeth.Kromhout@FloridaDEP.gov](mailto:Elizabeth.Kromhout@FloridaDEP.gov)>; Eldredge, Susan F <[Susan.Eldredge@dep.state.fl.us](mailto:Susan.Eldredge@dep.state.fl.us)>; loren januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; [cris@januaryservices.com](mailto:cris@januaryservices.com)  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

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Good morning Mr. Kothur,

I trust that all is well. As per our meeting discussions of September 14, 2022, and on behalf of January Environmental Services, Inc (JESI/Client), GeoTech Environmental, Inc (GeoTech) requests a **30 day-time extension** to respond to the Second Request for Information (Second RAI) for the above-mentioned facility. In our meeting we agreed, the request is justifiable to facilitate both GeoTech and FDEP to clarify concerns to the Second RAI comments 2 and 5a ( Page 4 of 5).

In reference to comment 2 above, GeoTech has already spoken with Carol Cassels, Environmental Specialist II / Inspector Environmental Health, Storage Tank Regulation -Florida Department of Health in Polk County to assist in providing information on any open violations pertaining to Financial Insurance and clarification permitting of TK-107. Further, time extension allows JESI to



submit the insurance documents and decide if they want to keep the tank and proceed with the registration and permitting (inspection, fees, as-Builts, etc.) or proceed with proper closure via removal in accordance with all applicable regulations or utilize the tank as a wastewater tank.

In summary, we all agree that this information is crucial for all parties to move forward with JESI being in full compliance with all regulatory authorities and for the renewal of the used oil permit application or other with FDEP;.

I await your response on this matter.

May All Beings Be Happy



**Neil Lakhani**  
**Director/Broker**  
**Environmental Consulting & Commercial Real Estate Brokerage**  
**A: 12555 Orange Drive, Suite 4221, Davie, Florida 33330**  
**P: 954 587 8100 M: 954 947 9884**  
**E: [neil@geotech-usa.com](mailto:neil@geotech-usa.com) W: [www.geotech-usa.com](http://www.geotech-usa.com)**  
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**From:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Sent:** Tuesday, September 13, 2022 11:19 AM  
**To:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>  
**Cc:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>; Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; Green, Sarah <[Sarah.Green@FloridaDEP.gov](mailto:Sarah.Green@FloridaDEP.gov)>; Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>; Ciaravella, Philip <[Philip.Ciaravella@FloridaDEP.gov](mailto:Philip.Ciaravella@FloridaDEP.gov)>; Kromhout, Elizabeth <[Elizabeth.Kromhout@FloridaDEP.gov](mailto:Elizabeth.Kromhout@FloridaDEP.gov)>; Eldredge, Susan F <[Susan.Eldredge@dep.state.fl.us](mailto:Susan.Eldredge@dep.state.fl.us)>; loren.januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Hi Leslie and all,  
Will do!

Thanks,  
Bheem

---

**From:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>  
**Sent:** Tuesday, September 13, 2022 10:39 AM  
**To:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>  
**Cc:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>; Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; Green, Sarah

<[Sarah.Green@FloridaDEP.gov](mailto:Sarah.Green@FloridaDEP.gov)>; Miller, Michael B. <[Michael.B.Miller@FloridaDEP.gov](mailto:Michael.B.Miller@FloridaDEP.gov)>

**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Bheem,

Yes! Please send both Sarah Green and I an invite; and invite Brandon Miller (Michael B. Miller in Outlook) as optional.

Thanks!



Leslie Pedigo  
Environmental Consultant  
Compliance Assurance Program  
Florida Department of Environmental  
Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
(813) 470-5870

---

**From:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>

**Sent:** Monday, September 12, 2022 10:19 AM

**To:** Pedigo, Leslie <[Leslie.Pedigo@FloridaDEP.gov](mailto:Leslie.Pedigo@FloridaDEP.gov)>

**Cc:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Nilesh Lakhlani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>; Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>; Bradshaw, Bonnie M. <[Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>

**Subject:** FW: January Environmental Services, Inc - FLD 982 162 943

Hi Leslie,

Would be interested in participating in our conference call with January Environmental Services, Inc. on Wednesday, September 14<sup>th</sup> at 11:00am, to discuss Second RAI.

Please let me know ASAP.

Thanks,

Bheem

---

**From:** Buselli, Bradley <[Bradley.Buselli@dep.state.fl.us](mailto:Bradley.Buselli@dep.state.fl.us)>

**Sent:** Monday, September 12, 2022 8:31 AM

**To:** Nilesh Lakhlani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>

**Cc:** loren januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; [cris@januaryservices.com](mailto:cris@januaryservices.com); Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>

**Subject:** RE: January Environmental Services, Inc - FLD 982 162 943

Wednesday the 14<sup>th</sup> works for me. The 8700-12FL can be found at the following link (also searchable within the 'Hazardous Waste' Catalog and 'Permitting\_Authorization' Profile):

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=2.479752.1\]&\[profile=Permitting\\_Authorization\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=2.479752.1]&[profile=Permitting_Authorization])



**Bradley Buselli, Environmental Consultant**  
 Florida Department of Environmental Protection  
 Hazardous Waste Program & Permitting  
 2600 Blair Stone Road, MS 4560  
 Tallahassee, FL 32399  
[Bradley.Buselli@FloridaDEP.gov](mailto:Bradley.Buselli@FloridaDEP.gov)  
 Office: 850-245-8989

**From:** Nilesh Lakhani <[Neil@geotech-usa.com](mailto:Neil@geotech-usa.com)>  
**Sent:** Monday, September 12, 2022 7:58 AM  
**To:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Buselli, Bradley <[Bradley.Buselli@dep.state.fl.us](mailto:Bradley.Buselli@dep.state.fl.us)>  
**Cc:** loren januaryservices.com <[loren@januaryservices.com](mailto:loren@januaryservices.com)>; [cris@januaryservices.com](mailto:cris@januaryservices.com)  
**Subject:** January Environmental Services, Inc - FLD 982 162 943

**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Good morning Mr. Kothur,

In furtherance to our conversation last Friday, GeoTech requests a meeting to discuss the Second Request for Additional Information (RAI) FDEP letter dated July 21, 2022.

In addition, GeoTech requests a copy of the DEP Form 8700-12FL1 on file dated June 1, 2022, which was mentioned in the FDEP Comment #1. We were unable to locate this document in OCULUS.

GeoTech can host the meeting via Microsoft Teams on the following proposed dates listed below:

1. Tuesday, September 13, 2022 at 10 am or
2. Wednesday, September 14, 2022, at 11 am

If these dates and times are not suitable, please provides times that work for you.

May All Beings Be Happy



**Neil Lakhani**  
 Director/Broker  
 Environmental Consulting & Commercial Real Estate Brokerage  
 A: 12559 Orange Drive, Suite 4221, Davie, Florida 33330  
 P: 954 597 8100 M: 954 947 8884  
 E: [neil@geotech-usa.com](mailto:neil@geotech-usa.com) W: [www.geotech-usa.com](http://www.geotech-usa.com)  
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<input type="checkbox"/>

## Thursby, Kim

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**From:** /O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7413839EC0A24212B3420B8453290984-THURSBY\_K  
**Sent:** Tuesday, January 24, 2023 7:47 AM  
**To:** 'Nilesh Lakhani'  
**Cc:** Smith, Michell M.; Walker, Kim (Waste); Bastek, Brian; Rodgers-Smith, Delores; 'Merizalde.carlos@epa.gov'; Ciaravella, Philip; Kromhout, Elizabeth; Pedigo, Leslie; Petersen, Dane; Ashwood, Janet; Eldredge, Susan F; Brock, James; 'Michael.miller@floridadep.gov'; 'Dsvld.petti@floridadep.gov'; Kothur, Bheem  
**Subject:** January Environmental Services, Inc. Florida, FLD 982 162 943; Facility Closure Plan dated December 30, 2022  
**Attachments:** 1-24-23 January UO Closure Plan Review Comments.Receipt.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us) (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith  
Environmental Administrator  
Hazardous Waste Program & Permitting



# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

January 24, 2023

Mr. Nilesh Lakhani, Project Manager  
January Environmental Services, Inc.  
1920 State Road 60 W  
Bartow, Florida 33830-4261  
[neil@geotech-usa.com](mailto:neil@geotech-usa.com)

Re: Facility Closure Plan dated December 30, 2022  
January Environmental Services, Inc. Florida, Facility I.D.: FLD 982 162 943; Expired  
Permit No: 307171-005-HO

Dear Mr. Lakhani:

The Department has completed its review of the referenced document regarding closure of the Used Oil and Material Processing facility located at 1820 State Road 60 West in Bartow, Florida 33830. The Closure Plan, dated December 30, 2022, addresses the requirements for a Used Oil Closure Plan under Chapter 62-710, Florida Administrative Code (F.A.C.). Please review the comments and revise Closure Plan accordingly.

A certification of closure completion that demonstrates the facility was closed in substantial compliance with the closure plan shall be submitted within 30 days of the conclusion of closure activities at this facility.

If the facility cannot be clean closed under this closure plan, the facility shall submit a permit application to close the facility and perform post-closure care in accordance with the closure and post-closure requirements of 40 CFR 264.310 that apply to hazardous waste landfills and in accordance with Chapter 62-730, F.A.C.

The Department also recommends the following comments for review and revise the closure plan and submit for the Final Approval:

1. *Closure Plan, Site Plan, List of Figures, Figure 2, Stormwater Pond, Page 22*: DEP suggest taking surface water samples for used oil parameters. Please see for detail comment #17, below of this document.
2. *Closure Plan, List of Table, Table-1, Closure Activities "Schedule" not "Report", Page 27*: Please revise the table title as appropriate.



January 24, 2023

3. *Closure Plan, Table 1, Task 8, Page 27*: FDEP releases the financial assurance, up on the acceptance of closure certification, and submitting the revised 8700-12FL, Form and surrendering the facility I.D. please review and revise as appropriate.
4. Closure plan is acceptable up on review, revise and resubmit.
5. Final closure plan should be updated to reflect all the changes.
6. Facility should submit the Final Closure Plan with a Hard Copy and Electronic Version to the Department.
7. *Closure Plan, Definitions, Page 5: The definition of a Regulated Substance is listed twice in items 14 and 17*: Please review and revise as appropriate.
8. *Closure Plan, Section 1, 1.1 Purpose, second paragraph Page 7*: Please let us know, the date the facility “ceased their activities at the Facility”? The way the department understand that would not have been until the facility had removed the used oil from the tanks and removed all of the used oil filters on December 9, 2022, according to the disposal receipts in Appendix B. The way the facility has it phrased it make it seem like the ceased activities once the permit expired. Please explain?
9. *Closure Plan, 2. Site Description, Section 3.4, Business operations, Page 10*: “January Transport, Inc (Property owner) is a family-owned and operated business that specializes in the wastewater management business since 1952. The waste management services are provided in various states Shouldn’t both sentence say waste management or include both waste and wastewater management. Please review and revise as appropriate.
10. *Closure Plan, Section 3.4, Business Operations, Page 10*: "One driver, Mr. Cruz Torres currently works at the facility and transports used oil and used oil filters to the Property Owner’s recycling facility at 4300 SW 36th Street, Oklahoma City, Oklahoma. “The Department recall that the facility has also transported used oil to a facility in Texas and the used oil filter used to be transported to US Foundry in Miami. Or the sentence could be changed to “One driver, Mr. Cruz Torres currently works at the facility and most recently transported used oil and used oil filters to the Property Owner’s recycling facility at 4300 SW 36th Street, Oklahoma City, Oklahoma.” The yellow highlighted misspelling is as provided in the report.
11. *Closure Plan, Subsection 3.4.2, Page 10*: “The containers are stored in concrete Secondary Containment # 4 which is elevated approximately 4 feet above land surface”. While some drums were stored in the area indicated, when the department have been on site, the bins and some drums were stored on the west wall of the warehouse and not in the area inducted on Figure 3. The area indicated on Figure 3 contained a large poly tanks and sampling waste drums. Please review the subsection and revise as appropriate.
11. *Closure Plan, Subsection 3.4.2, last paragraph, Page 11*: Since the permit requires the disposal of unused equipment and the buyer does not want tank TK

- 108, please describe how this tank will be handled. Please review and revise as appropriate.
12. *Closure Plan, Section 4, 4.0 Closure Activities, Second Paragraph, Page 14*: The paragraph states “After cleaning, decontamination, and verification that all structures are reusable, it is Permittee’s intent to leave all six (6) tanks (TK 101 through TK107), two blending tanks BT 301 and 302, one (1) 200-gallon AST, all piping, pumps, secondary containments, and sumps at the facility for the buyer. This should be all seven (7) tanks not six (6) tanks. Please review and revise as appropriate.
  12. *Closure Plan, Subsection 4.4, Task 4, Removal of oily waste, cleaning, characterization, disposal, sampling and analysis, first paragraph, Page 15*: As mentioned in Task 1, used oil and oily waste generated from the tanks were previously cleaned and disposed of by the Permittee. It is more appropriate to say that the contents were removed rather than cleaned. Please review and revise as appropriate.
  13. *Closure Plan, Subsection 4.4, third Paragraph, Page 15*: Once it is confirmed that most of the solids are evacuated, physical methods involving high pressure will be used inside the tank and contained area and only as necessary and with caution to avoid spreading contamination. Facility may use High pressure air or high-pressure water. Please review the paragraph and revise as appropriate.
  14. *Closure Plan, Subsection 4.8, Task 8, Second Paragraph, Page 19*: Within 30 days of determining that the facility was closed in accordance with its closure plan, the FDEP shall review the closure certification and accepts. The facility may request for release from its financial assurance obligations by providing the revised the 8700-12FL” form and surrounding the facility I.D.
  15. *Figure 2: If we require surface water sampling as above comment #1, suggestions, this will need to be added to Section 4 as well*: Please review Section 4.7 and 4.8 on page 19 and revise appropriate.
  16. *Figure 3*: This figure should be revised to indicate the drum and bin storage on the west side of the warehouse. Please document Photos in previous DEP inspection documents.
  17. *Figure 4*: An additional soil sample directly south of SB-9 should be considered to account to the drum and bin storage along the west wall of the warehouse. Please review and revise as appropriate.
  18. *Figure 5*: An additional temporary well directly south of SB-9 should be considered to account to the drum and bin storage along the west wall of the warehouse. Please review the document and revise as appropriate.
  19. *Storage Tank Program*: The facility currently has two open violations for not having financial responsibly for the six (6) regulated Storage Tanks (Tanks 101 through Tank 106 (see below). Documentation of current insurance needs to be provided to the Department. Please note that the facility has the FA for the closure of the facility.

Mr. Nilesh Lakhlani, Project Manager

Page 2 of 2

January 24, 2023

20. *General Comment:* Please review the entire document and correct the spellings as appropriate.

21. *General Comment:* The permit is expired on April 16, 2022, the closure plan submitted on December 30, 2022. The closure plan may be addressed and implemented according to the Consent Order (CO).

1.

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Facility Information  
Regulatory Information

Date Cited	Citation Type	Status	Significance	Violation	Reevaluation	Resolved Date	Resolving Activity Id
04/30/2020	Violation	Open	Minor	Incomplete documentation demonstrating financial responsibility.	Review		
04/30/2020	Violation	Open	SNC-B	Failure to maintain and demonstrate financial responsibility.	Review		

**Violation Code:** 5012

**Description:** Incomplete documentation demonstrating financial responsibility.

**Explanation:** Certification of Financial Responsibility Form Part P forms: none available.

**Corrective Action:** Completed Part P Forms for the coverage periods of 01/25/2019 to 04/28/2020 and for 04/28/2020 to 01/25/2021 must be provided to the Department.

**Violation Code:** 5011

**Description:** Failure to maintain and demonstrate financial responsibility.

**Explanation:** Financial Responsibility: Nautilus Insurance Company insurance policy; coverage period is 04/28/2020 to 01/25/2021. - The financial responsibility information for 01/25/2019 to 04/28/2020 was not available.

**Corrective Action:** Financial responsibility documentation for this timeframe must be provided to the Department.

If you have any questions, please contact Michell Smith at 850-245-8721 or email: [Michell.M.Smith@floridadep.gov](mailto:Michell.M.Smith@floridadep.gov); or Bheem Kothur at 850-245-8781 or email at [Bheem.Kothur@floridadep.gov](mailto:Bheem.Kothur@floridadep.gov);

Sincerely,



Michell Mason Smith, Environmental Administrator  
Hazardous Waste Program and Permitting  
MS/bk

cc:

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)

Delores Rogers-Smith, EPA Region 4, [Rodgers-smith.delores@epa.gov](mailto:Rodgers-smith.delores@epa.gov)

Carlos Merizalde, EPA Region 4, [Merizalde.carlos@epa.gov](mailto:Merizalde.carlos@epa.gov)

Phil Ciaravella, DEP Headquarters, [phil.ciaravella@floridadep.gov](mailto:phil.ciaravella@floridadep.gov)

Mr. Nilesh Lakhani, Project Manager

Page 2 of 2

January 24, 2023

Elizabeth Kromhout, DEP Headquarters, [Elizabeth.kromhout@floridadep.gov](mailto:Elizabeth.kromhout@floridadep.gov)

Leslie Pedigo, FDEP Southwest District, [allah.irwin@floridadep.gov](mailto:allah.irwin@floridadep.gov)

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Susan Eldredge, FDEP Headquarters, [susan.eldredge@floridadep.gov](mailto:susan.eldredge@floridadep.gov)

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