

# Oils Unlimited, Inc.

655 West Fulton Street, Suite 8  
Sanford, FL 32771  
407-302-3183  
407-302-3189 fax

William P. Patterson  
President  
Oils Unlimited

March 12, 2000



Mr. Robert T. Snyder, P.E.  
Program Manager  
Hazardous Waste

RE: Compliance response to your referenced OCD-HW/C-00-0041

We offer the following, using your reference letter:

12a- As related in person to your site visitors, we do not collect any industrial waste waters. The only water that we accept is secondary containment water, which is exempt. This water is collected directly from our customer's tank storage secondary containment area by our representative and transported exclusively by our truck.

We do not drain or generate any aqueous or solid waste incidental to our oil operations. If it has free water, we do not accept these oils.

12b- As explained to your representatives previously, we received a lab report on one load of fuel/oil of 1052.7 ppm. We performed two dexsil tests and each showed results of halogens content of less than 1000 ppm. This in fact was not a high halogen load. Any loads in future will not be accepted as is and has been our policy.

12c- We do not accept "used oil" from other transporters. We only accept E.P.A. on specification oils, which are exempt. In two years, we have sold 3 million gallons of oil. None were off specification.

As you know, we applied for a USED OIL PROCESSOR Permit when we were located on the Sanford Airport. Your requirement that a landowner must accept collateral liability stemming from processing. This requirement for terms of practicality negates any functional possibility of securing a processing permit unless the permittee owns the land where the process is to take place. Twice, we have approached current landlord and previous, to secure their consent to collateral liability only to be refused both times.

We have purchased a property from Catherine Hanson Realty in Lake County and have secured appropriate zoning for used oil processing. It is our intent to move to this site and apply for a Used Oil Processor Permit at that time. This is to be accomplished this calendar year.

As previously stated, there is no possibility for us to obtain landowners acceptance of collateral liability at our present rental site. We already sent you \$2000.00, which you kept in an abortive pursuit of a processor permit.

In light of the above, we are taking the following measures:

- a. We have purchased an x-ray fluorescence analyzer, which will test all incoming oil for E.P.A. on specification requirements prior to the oil being unloaded from the vendor's truck. We will not accept any off-spec. This machine will be delivered in late March 2000 with appropriate training by manufacturer provided to our lab people.
- b. Until we have the analyzer operational, we will segregate incoming loads by vendor in a dedicated vendor tank (i.e. one tank each vendor). Each load will be held in isolation until we get an overnight test result from Bristol. Once the respective test validates that this oil is E.P.A. on-spec, we will then move it to our bulk storage tank. If any load fails to meet E.P.A. on-spec criterion, it will be returned to vendor for appropriate disposition by them.

At no time will we have in excess of 25,000 gallons of used oil pending testing on our premises.

In summary, we do NO processing at our present facility. We do nothing to improve our incoming oil to E.P.A. on-specification. We do NOT store "used oil" in excess of twenty-five thousand gallons. We do NOT accept used oil from anyone, only E.P.A. on-spec fuel. We do NOT process industrial waste water.

We appreciate your review of the above and will continue to cooperate with you in any way required.

Sincerely,



William P. Patterson

KAREN VIOLET FOR  
WILLIAM P. PATTERSON