

From: [Eddie Maylon](#)
To: [Epost HWRS](#)
Subject: Water Recovery, LLC - Tampa;FLR000199802;First Request for Additional Information (RAI)
Date: Monday, March 3, 2025 7:48:44 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

EXTERNAL MESSAGE

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

Received, thank you

Respectfully,



Edward Maylon
General Manager
Water Recovery, LLC

Direct Line: 781.353.5332

WRIJax.com

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From: [Thursby, Kim](#)
To: emaylon@wrijax.com
Cc: [Smith, Michell M.](#); [Kromhout, Elizabeth](#); [Bastek, Brian](#); ["Merizalde.carlos@epa.gov"](mailto:Merizalde.carlos@epa.gov); [Echevarria, Edgar](#); [Buselli, Bradley](#); [Pedigo, Leslie](#); [Ciaravella, Philip](#); nward@wrijax.com; akimball@wrijax.com; blake.holcomb@swca.com; Mike.Connelly@swca.com; [Parker, Andie](#)
Subject: Water Recovery, LLC - Tampa;FLR000199802;First Request for Additional Information (RAI)
Date: Monday, March 3, 2025 7:39:00 AM
Attachments: [3-3-25 WRI Tampa First RAI.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 (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.

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

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

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

REQUEST FOR ADDITIONAL INFORMATION

March 3, 2025

Mr. Edward Maylon, General Manager
75D York Ave.
Randolph, MA 02368
emaylon@wrijax.com

Re: **First Request for Additional Information (RAI)**
Water Recovery, LLC - Tampa
EPA ID Number: FLR000199802
Current Used Oil & Material Processing Permit: 330300-008-HO and 330300-007-SO
DEP Application Number: 330300-009-HO and 330300-010-SO
Hillsborough County – Hazardous Waste

Dear Mr. Maylon

Thank you for your application for the Used Oil & Material Processing Permit for the above-mentioned Facility. The Department has assigned DEP Application No. 330300-009-HO and 330300-010-SO to the application. A Department staff review of the application and supporting documentation submitted on February 6, 2025, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information requested in the attached documents and refer to this correspondence in your response.

For the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 90 days of the date of this letter, May 28, 2025, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to andie.parker@floridadep.gov and philip.ciaravella@floridadep.gov. If the file is very large, you may contact Andie Parker to set up a link to a shared folder. After posting the document, send an

Mr. Edward Maylon, General Manager

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e-mail to HWPP@dep.state.fl.us, with a copy to andie.parker@floridadep.gov, alerting us that it has been posted.

If you have any questions regarding the Used Oil portions of the application, please contact Andie Parker by telephone at 850-245-8766 or by e-mail at andie.parker@floridadep.gov. If you have any questions regarding the Solid Waste Material Processing portions of the application, please contact Phil Ciaravella by telephone 850-245-8742 at or by email at philip.ciaravella@floridadep.gov.

Sincerely,



Michell Mason Smith, Environmental Administrator
Hazardous Waste Program & Permitting

MS/ap

Attachment 1: List of Requested Information – Used Oil

Attachment 2: List of Requested Information – Solid Waste

cc (w/ Attachments):

Brian Bastek, EPA Region 4 bastek.brian@epa.gov

Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov

Edgar Echevarria, DEP Headquarters, Edgar.Echevarria@floridadep.gov

Bradley Buselli, DEP Headquarters, bradley.buselli@floridadep.gov

Leslie Pedigo, DEP Southwest District, leslie.pedigo@floridadep.gov

Phil Ciaravella, DEP Headquarters, philip.ciaravella@floridadep.gov

Nadia Ward, WRI Jacksonville, nward@wrijax.com

Amanda Kimball, WRI Jacksonville, akimball@wrijax.com

Blake Holcomb, SWCA Environmental, blake.holcomb@swca.com

Mike Connelly, SWCA Environmental, Mike.Connelly@swca.com

Attachment 1: List of Requested Information – Used Oil

Facility Name: Water Recovery, LLC - Tampa

Facility ID: FLR000199802

DEP Application No.: 330300-009-HO and 330300-010-SO

General Comments:

- 1) Comment formatting note; comments have been separated into parts I and II in congruence with the application. Each comment will begin with reference to which application item the comment is addressing.
- 2) The information provided in the application varies from the information provided on the current DEP Form 8700-12FL dated February 29, 2024. Specific differences are found when comparing information regarding contact information and waste codes. It's possible that the 8700-12FL form and/or the used oil permit application need updates.
- 3) During the pre-application meeting on November 14, 2024, facility representatives described a planned tank replacement and process change. With additional site file documentation, specifically the Inspection report dated October 31, 2023, it is understood that the original frac tanks used for primary settling, heat treatment, and chemical addition have or will be replaced with vertical equalization tanks. The Department is unclear whether or not these activities have taken place yet. Please clarify the current layout and ensure the application distinguishes current and proposed onsite activities.

Part I:

- 4) A.2. The initial application revision number should be listed as 0. The next revision should be listed as 1.
- 5) A.6. The EPA ID number does not appear to be correct, please revise.
- 6) C.4. Although the process flow seems to adequately describe how trucks are received and offloaded at the offloading pad it is not clear how UO is received from Berths #247 and #248. Appendix A. Figure 3 of the Oil Spill Prevention, Control, Countermeasures and Contingency Plan depicts intake at Berth #247 and discharge to the wastewater treatment area. It is also unclear which tanks are utilized as primary settling tanks. Please provide a detailed description of the process flow, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment.
- 7) C.6. Oil Spill Prevention, Control, Countermeasures and Contingency Plan supplied to meet the requirements for (40 CFR, Part 379.52(a)) Preparedness and Prevention and (40 CFR, Part 379.52(b)) Contingency Plan and Emergency Procedures.
 - a. Facility Layout information, Section 6.4 of the Oil Spill Prevention, Control, Countermeasures and Contingency Plan, varies from General Information Part I.A. and Site Information Part I.B.
 - i. "The Hendry Corporation owns the property where WRI operates"
 - ii. "WRI facility consists of 3.2 acres"
 - b. Include figures showing evacuation routes.
 - c. All emergency equipment response items must be described – inventory, type, size, location and testing and maintenance schedule.
 - i. Fire control equipment must be described. If fire control equipment requires water is an adequate volume and pressure available?

Mr. Edward Maylon, General Manager

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- ii. If pressurized horns are used to alert employees to evacuate describe their location, this could be a map.
- 8) C.11. Changes to the closure plan would require a recalculation of the closure cost estimate. Please confirm and document that the closure cost estimate is based on current site conditions.

Mr. Edward Maylon, General Manager
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Attachment 2: List of Requested Information – Solid Waste



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, FL 32399

Memorandum

TO: Andie Parker
Hazardous Waste Program & Permitting

FROM: Phil Ciaravella
Solid Waste Program & Permitting

SUBJECT: Review Comments, Application for Renewal of the Solid Waste Processing Operation Permit; received February 6, 2025

DATE: February 27, 2025

1. Please provide a completed application form 62-701.900(4). Rule 62-701.710(2), F.A.C. The form can be found at: [Application to Construct, Operate, or Modify a Waste Processing Facility | Florida Department of Environmental Protection](#)
2. Please provide a description of the operation of the facility including: Rule 62-701.710(2)(a), F.A.C.
 - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
 - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
 - c. How the materials will be managed or processed;
 - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
 - e. The types of equipment that will be used;
 - f. The maximum time materials will be stored at the facility;
 - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
 - h. The expected disposition of materials after leaving the facility.

Note: Facility information that was submitted to the Department to support the expiring permit, and which is still valid, does not need to be re-submitted for permit renewal. The permit renewal application shall list and reaffirm that the information is still valid. Rule 62-701.320(10)(c)