



Your Sustainable Advantage

June 8, 2023

Kendall Wals
City of Puyallup
333 South Meridian
Puyallup, WA 98371

Re: Request for Minor Modification to Conditional Use Permit (P-18-0154)
Ecolube Recovery Puyallup (213 10th SE / TPN 040274118)
Refurbish and Reuse of existing Tank 5 & 6

Dear Ms. Wals,

Ecolube Recovery ("ELR") is seeking approval to refurbish and reuse 2 atmospheric storage tanks for used motor oil. After several years of operation at this location and continued growth in incoming volumes of used oil for recycling from the greater Seattle-Tacoma area, it has become apparent that there is need for additional storage capacity at the site. As part of the used oil recycling regulations, there are requirements for the collection, proper testing of the used oil via independent laboratory and storage for out-bound product(s). The overall increase in volume, longer turn-around times on lab results, and more comprehensive testing requirements is making it challenging for ELR operations under current storage configuration at the site.

Ecolube Recovery has plans to refurbish and reuse the last two pre-existing and in-place storage tanks (Tanks 5 & 6). This decision is based on evaluation of the tanks by a certified tank inspection company and a structural engineer. We will modify the tanks to remedy the required recommendations provided by the tank inspector and structural engineer's evaluation. The proposed modifications will include minor modifications to Tanks 5 & 6 and connecting piping between Tanks 5 & 6 with the existing unload and loading piping manifolds. Ecolube is requesting to follow the same protocol to allow for the reuse of Tanks 5 & 6 at the site within the CUP requirements presented below.

"20.80.031 Minor additions or modifications to sites and structures.

Minor additions or modifications to sites and structures permitted under existing valid conditional use permits may be administratively approved by the community development director, subject to the following findings:

- (1) The proposed addition or modification is determined to be in substantial conformity with any and all previous valid conditional use permits for existing uses on the site.

ECL Response: The proposed change continues to meet the authorized use for "collection, storage and transfer of used oil to an off-site facility" consistent with the CUP.

- (2) The proposed addition or modification directly relates to a use or structure established under a previous valid conditional use permit.

ECL Response: The modification request directly relates to “collection, storage and transfer of used oil to an off-site facility” consistent with the CUP.

- (3) Structural additions or modifications permitted administratively shall not constitute more than 1,000 new net square feet nor shall nonstructural additions or modifications involve greater than 2,000 square feet of site area.

ECL Response: Tank 5 covers 110 sq ft and Tank 6 cover 110 sq ft of site area that is existing onsite but not administratively allowed for use at this time.

- (4) No more than one administrative approval for any such minor addition or modification shall be granted on a single property within any two-year period.

ECL Response: This is the only administrative approval request made since installation. Ecolube understands that no other administrative approval can be made within any two-year period.

- (5) The proposed addition or modification shall still be subject to all other applicable city codes and development standards, including setback, screening, or buffering requirements.

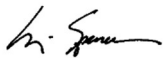
ECL Response: There is no change to meeting applicable codes and development standards, including setback, screening, or buffering requirements related to the reuse of Tanks 5 & 6.

- (6) The proposed addition or modification will be served by existing streets, driveways and utilities, and will not require relocation of any existing structures or other site modifications.

ECL Response: There are no changes to vehicle traffic associated with the reuse of Tank 5 & 6.

Please let us know if there are any questions associated on the responses to required provisions for allowing minor modifications to the Condition Use Permit (CUP) Permit (P-18-0154).

Sincerely,



Eric Spencer
Chief Executive Officer
Ecolube Recovery, LLC