



September 17, 2021

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 10<sup>th</sup> SE / TPN 040274118)  
Refurbish and Reuse of existing Tank 3

Dear Ms. Wals,

Ecolube Recovery received approval to refurbish and reuse 6 atmospheric storage tanks, three for used motor oil and three for antifreeze. After some months of operation, it has become apparent that there is need for additional storage of used motor oil onsite for segregation and transport volumes. As part of the used oil recycling regulations, there are requirements for collection, holding for lab screening and storage for out-bound product(s). Ecolube would like to separate out-bound products into different distribution grades and requires another storage tank to adequately segregate grades. Additionally, there has been an increase in used oil volumes by 15 to 20% since the original tank plan design was submitted.

Ecolube Recovery has refurbished and reused 3 tanks (Tanks 1, 2 & 4) previously based on evaluation of tank inspection company and structural engineer and completing the required recommendations from those reviews. The proposed modifications will include minor modifications to Tank 3 and connecting piping between Tank 3 and the existing unload and loading piping manifolds. Ecolube is requesting to follow the same protocol to allow for the reuse of Tank 3 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 3 covers 95 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 Tank 3.**

- (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.

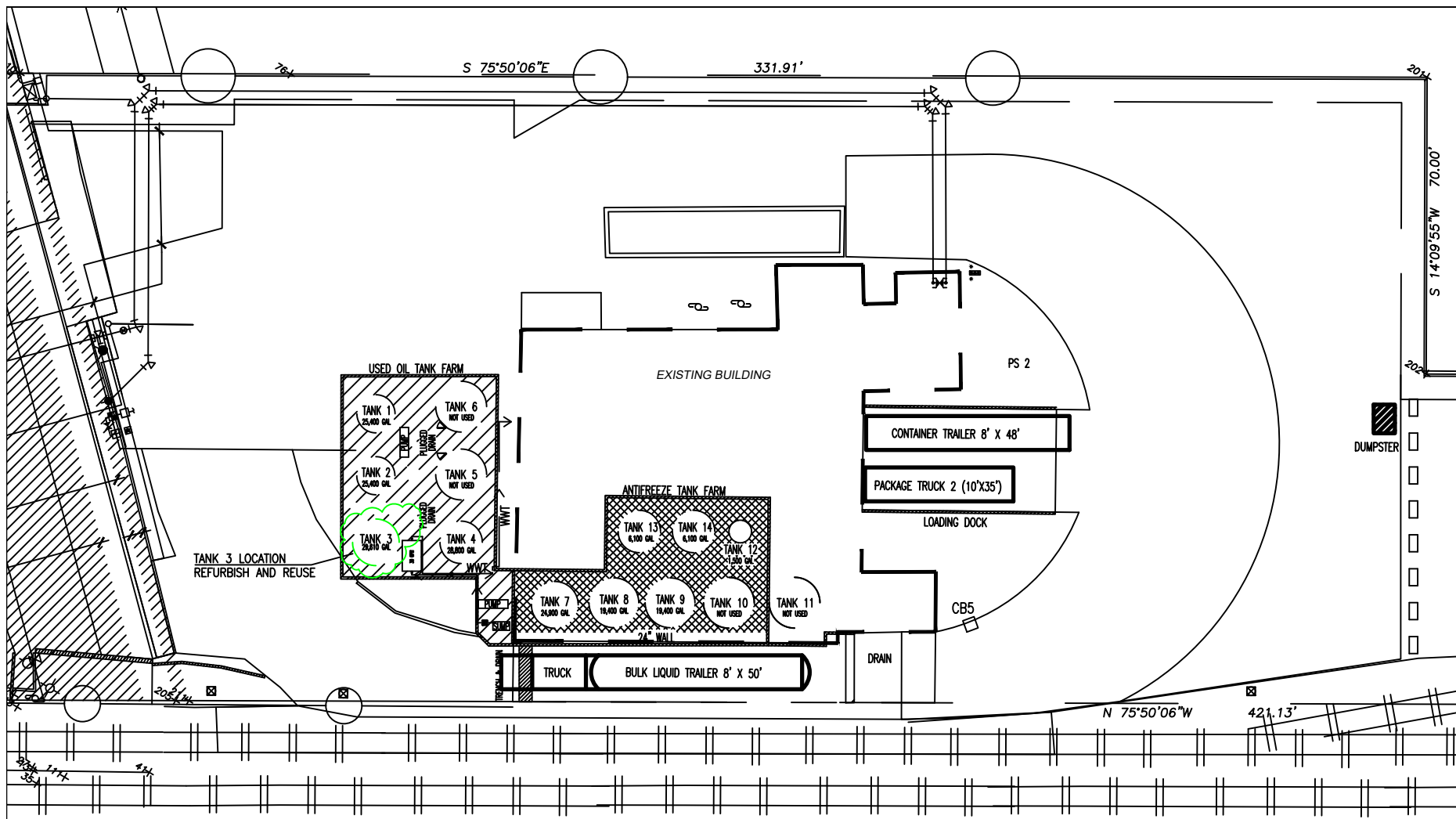
**ECL Response: There are no changes to vehicle traffic associated with the reuse of Tank 3.**

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



# B. N. S. F. RAILROAD

WWT = WASTEWATER TREATMENT EQUIPMENT

**1** WASTEWATER\_PLAN  
NOT TO SCALE

NO.	REVISION	DATE	BY	CHK.	APP.	DATE	REVISION	NO.	REVISION	DATE	BY	CHK.	APP.	DATE	REVISION	NO.	REVISION	DATE	BY	CHK.	APP.	DATE	
1	ISSUED FOR TANK 3 REUSE	05/20/21																					



ECOLUBE RECOVERY  
213 10TH ST SE  
PUYALLUP, WA 98731

ECOLUBE PUYALLUP  
TANK 3 REUSE PROJECT  
SITE PLAN