



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
SOUTHEAST DISTRICT OFFICE
400 NORTH CONGRESS AVENUE, 3RD FLOOR
WEST PALM BEACH, FL 33401
561-681-6600

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR
SECRETARY

June 3, 2014
ELECTRONIC CORRESPONDENCE

Mr. Mark Lukin, President/CEO
Scrubbers, Inc.
465 Brickell Ave, Suite 3702
Miami, Florida 33131
Email: mark@getscrubbed.com

Palm Beach County
IW – Scrubbers, Inc.

Dear Mr. Lukin:

RE: Permit Exemption - Scrubbers, Inc.
Mobile Pressure Cleaning and Water Reclamation

The Department has received your request for permit exemption for Scrubbers, Inc. for mobile pressure washing with water reclamation. The Department has determined that an industrial wastewater discharge permit will not be required and will authorize a permit exemption for mobile pressure washing service as described in the exemption request.

This exemption is contingent upon Scrubbers, Inc. following the Best Management Practices (BMPs) proposed in document submitted and dated May 28, 2014 and outlined on the following page.

This exemption is in accordance with Rule 62-4.040, Florida Administrative Code. Please be advised that failure to comply with above requirements may lead to revocation of this exemption and enforcement action. Please also note that this letter does not exempt you from any other State, Local and Federal permitting requirements.

Should you have any additional questions, please call Bradley Akers at telephone number (561)681-6690 or email Bradley.Akers@dep.state.fl.us.

Sincerely,

Bradley M. Akers, P.E.
Environmental Administrator
Wastewater Permitting

Scrubbers, Inc. Best Management Practices (BMPs)

1. The service fleet of Scrubbers, Inc. are equipped with a fully self-contained, closed-loop proprietary system which allows Scrubbers to clean a variety of horizontal and vertical surfaces with high temperature, variable pressure and flow pressure cleaners and reclaim up to 95% of the water being used and subsequently effectively remove the contaminants (petrochemicals, oils, solids, heavy metals and sludge) and re-use the same water to continue the cleaning process.
2. This is accomplished through a proprietary filtration system utilizing oil-water separation technology, various bag filtration media and purpose-built filter cartridge technology. The system has been tested to remove contaminants and particulates down to 40 microns.
3. Our system introduces zero discharge in surface or ground waters.
4. All surfaces being cleaned are swept, prior to washing.
5. Any solvents, degreasers or brighteners which are utilized are 100% biodegradable, non-toxic and contain zero phosphates, petroleum distillates, nitrates or chlorine.
6. There is no need to discharge any waste water generated into an approved storm water management system.
7. Since zero wastewater flows into surface drains during our process, it is less than the allowable 2,000 gallons per week per site as per the guidelines.
8. Solid wastes (grit, sludge, etc.) are disposed of in accordance with Florida DEP and Federal EPA Standards and Practices.
9. Scrubbers, Inc. maintains all records of each facility cleaning, indicating the time, date, work scope and location of each activity which can demonstrate that applicable exemption criteria were met. The records are available for your Department's personnel upon request.