

Kantor, Karen E.

From: Thornburgh, Jack H (WT) [Conrad.Thornburgh@siemens.com]
Sent: Thursday, September 27, 2007 6:08 PM
To: Kantor, Karen E.; Jones, Carol (WT)
Cc: Kothur, Bheem; Winston, Kathy; Masella, Jack J (WT)
Subject: RE: Response to Exit Interview dated 8/16/07



DOC070927.pdf

Karen,

Please find attached our response to your email below. I have also placed this information as well as the full revised SPCC and EAP Plans (together comprising our Contingency Plan) in the mail to you via UPS Overnight. Please let me know if there are any further issues.

Thanks,

Jack Thornburgh
Branch Manager, Hydrocarbon Services
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, Florida 33064
Conrad.Thornburgh@Siemens.com
phone: 954-785-2320 x 1104
fax: 954-783-6913
cell: 954-868-1376

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-----Original Message-----

From: Kantor, Karen E. [mailto:Karen.E.Kantor@dep.state.fl.us]
Sent: Monday, September 17, 2007 1:56 PM
To: Thornburgh, Jack H (WT); Jones, Carol (WT)
Cc: Kothur, Bheem; Winston, Kathy
Subject: Response to Exit Interview dated 8/16/07

Jack:

I have received and reviewed your compliance submittal in response to the Department's inspection dated 8/16/07, and offer the following comments (by item number on the Exit Interview):

1.a) I recall reviewing your facility's Contingency Plan or SPCC Plan during the inspection, and noting that your facility did have in place most of the requirements of the Contingency Plan (Spill Response procedure, instructions for handling contaminated materials & residues, description of emergency response arrangements [needed update], emergency equipment list and capabilities, etc.). The Fire Protection and Emergency Action Plan in your submittal appears to be only a portion of the full Contingency Plan that is required for your facility, since it doesn't contain some of the items I notated during your inspection. With regard to this, there are portions of the Contingency Plan/SPCC Plan that also require updating with regard to emergency coordinators,

including a section that describes the current and updated emergency response arrangements with local authorities. For the purposes of the compliance inspection, please provide copies of those portions of all the associated Contingency Plan documents that required updating. Please ensure that your permit renewal application clearly includes all the documents that your facility maintains to collectively to meet the Contingency Plan requirement. A blank copy of the Department's compliance evaluation checklist for Used Oil Processor facilities is attached for your reference; it is useful in providing a list of the required elements of the Contingency Plan (either as a single document or a compilation of documents):

<<OILPROC.doc>>

b) Your submittal only includes documentation of distribution of your updated Fire Protection and Emergency Action Plan to the fire department. Any updates to the Contingency Plan document(s) must be distributed to all authorities: police (BSO), fire (Deerfield Beach FR), hospital (North Broward), and emergency response contractor (SWS). Please submit documentation that the updates were also distributed to the other authorities (police, hospital, SWS), and ensure that this documentation is included in your Contingency Plan.

c) starting around page 11, the page numbering for the document's sections is off from the Table of Contents.

2-4. Items corrected.

5. Please provide close-up photograph(s) of labeling on the rollofs.

Please provide the requested items within ten (10) days so that I can close your case as returned to compliance. Please contact me if you have any questions.

Karen Kantor, P.G.
Professional Geologist I
Florida Department of Environmental Protection 400 N. Congress Avenue,
Suite 200 West Palm Beach, FL 33401 561-681-6720 561-681-6770 fax
karen.e.kantor@dep.state.fl.us

Siemens Water Technologies Corp., 1280 NE 48th Street, Pompano Beach, FL 33064

Karen Kantor
Permitting Coordinator
Florida Department of Environmental Protection
400 N. Congress Ave, Ste 200
West Palm Beach, FL 33401

Phone: 561-681-6600
Fax: 561-681-6770

Name	Jack Thornburgh
Telephone	954-785-2320 x 1104
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Cell	954-868-1376
E-mail	Conrad.Thornburgh@siemens.com
Internet	www.usfilter.com
Date	September 27, 2007

Dear Karen:

Re: Response to email comments dated 9/17/2007.

This report is in response to your email comments dated 9/17/2007, paraphrased below in italics. These comments were in response to Siemens response to your Notice of Potential Hazardous Waste Non-Compliance dated August 16, 2007. We have addressed the deficiencies noted and have attached supporting evidence.

1.a) "...Please ensure that your permit renewal application clearly includes all the documents that your facility maintains to collectively to meet the Contingency Plan requirement..."

Answer: Enclosed please find both a revised Emergency Action Plan and a revised SPCC Plan, which collectively make up our Contingency Plan. We believe this addresses all of the areas included on the checklist you provided.

b) "Your submittal only includes documentation of distribution of your updated Fire Protection and Emergency Action Plan to the fire department. Any updates to the Contingency Plan document(s) must be distributed to all authorities: police (BSO), fire (Deerfield Beach FR), hospital (North Broward), and emergency response contractor (SWS). Please submit documentation that the updates were also distributed to the other authorities (police, hospital, SWS), and ensure that this documentation is included in your Contingency Plan."

Answer: Enclosed please find copies of the Certified Mail letters used to transmit the Contingency Plan to the police department, fire department, hospital, emergency response contractor, and the Broward County Emergency Response Agency. Copies of the letters are also included in the site's Contingency Plan.

c) "starting around page 11, the page numbering for the document's sections is off from the Table of Contents."

Answer: We have corrected the Table of Contents in the enclosed plan.

2-4. "Items corrected."

5. "Please provide close-up photograph(s) of labeling on the rollofs."

Answer: Photos below.



Should you have any questions or comments regarding this matter, please feel free to contact me at (954)785-2320.

Sincerely,

A handwritten signature in blue ink, reading "Jack Thornburgh". The signature is fluid and cursive, with the first name "Jack" and last name "Thornburgh" clearly legible.

Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Didier Dupuy

Siemens Water Technologies Corp., 1280 NE 48th Street, Pompano Beach, FL 33064

Richard W. Sudol
Coordinator Safety Services
North Broward Hospital District
1600 Andrews Ave
Fort Lauderdale, FL 33316

Phone: (954)831-2782

Name	Jack Thornburgh
Telephone	954-785-2320 x 1104
Fax	954-783-6913
Cell	954-868-1376
E-mail	Conrad.Thornburgh@siemens.com
Internet	www.usfilter.com
Date	September 27, 2007

Certified Mail: 7099 3400 0000 2226 6330

Dear Mr. Sudol:

Re: Contingency Plan Update
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, FL 33064

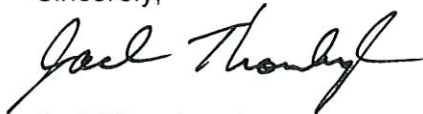
Please find enclosed an updated Emergency Action Plan and Spill Prevention Control and Countermeasure (SPCC) Plan for the above referenced facility. The emergency contact information has been changed, and the plans have been updated in several sections since our last plan submission. Please update your records.

Together, these plans constitute our Contingency Plan in compliance with 40 CFR 279.52(b).

We would also like to invite you to visit our facility at your convenience to review emergency entry procedures, and site specific hazards related to emergency response.

Should you have any questions or comments regarding this matter, or would like to arrange for a tour of our facility, please feel free to contact me at (954)785-2320 x1104.

Sincerely,



Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Karen Kantor, FDEP Permitting Coordinator

SIEMENS

Water Technologies

Siemens Water Technologies Corp, 1280 NE 48th Street, Pompano Beach, FL 33064

Sherman "Tony" Carper, Jr.
Director, Broward Emergency Management Agency
201 Northwest 84 Avenue
Plantation, Florida 33324

Phone: (954)831-3905
Fax: (954)382-5805

Name	Jack Thornburgh
Telephone	954-785-2320 x 1104
Fax	954-783-6913
Cell	954-868-1376
E-mail	Conrad.Thornburgh@siemens.com
Internet	www.usfilter.com
Date	September 27, 2007

Certified Mail: 7099 3400 0000 2226 6361

Dear Mr. Carper:

Re: Contingency Plan Update
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, FL 33064

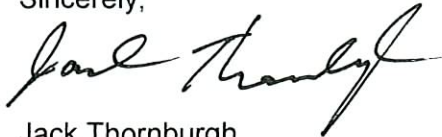
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Sincerely,



Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Karen Kantor, FDEP Permitting Coordinator

SIEMENS

Water Technologies

Siemens Water Technologies Corp, 1280 NE 48th Street, Pompano Beach, FL 33064

Gail Knapp
Deerfield Beach Fire & Rescue
1441 FAU Research Park Blvd.
Deerfield Beach, FL 33441-6258

Phone: 954-480-4350
Fax: 954-427-3349

Name	Jack Thornburgh
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E-mail	Conrad.Thornburgh@siemens.com
Internet	www.usfilter.com
Date	September 27, 2007

Certified Mail: 7099 3400 0000 2226 6422

Dear Gail:

Re: Contingency Plan Update
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, FL 33064

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Sincerely,



Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Karen Kantor, FDEP Permitting Coordinator

Siemens Water Technologies Corp, 1280 NE 48th Street, Pompano Beach, FL 33064

Major William Knowles
Broward County Sheriff's Office, Pompano District
100 SW 3rd Street
Pompano Beach, FL 33060

Phone: (954) 786-4201

Name	Jack Thornburgh
Telephone	954-785-2320 x 1104
Fax	954-783-6913
Cell	954-868-1376
E-mail	Conrad.Thornburgh@siemens.com
Internet	www.usfilter.com
Date	September 27, 2007

Certified Mail: 7099 3400 0000 2226 6392

Dear Major Knowles:

Re: Contingency Plan Update
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, FL 33064

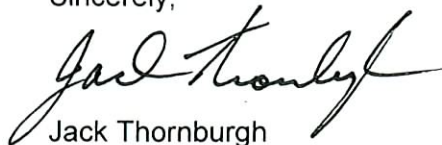
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Sincerely,



Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Karen Kantor, FDEP Permitting Coordinator

Siemens Water Technologies Corp, 1280 NE 48th Street, Pompano Beach, FL 33064

Sean Hagerott
SWS, Inc.
3133 NW 25th Avenue
Pompano Beach, FL 33069

Phone: (954) 957-7271
Fax: (954) 957-7807

Name	Jack Thornburgh
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Cell	954-868-1376
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Internet	www.usfilter.com
Date	September 27, 2007

Certified Mail: 7099 3400 0000 2226 6248

Dear Sean:

Re: Contingency Plan Update
Siemens Water Technologies Corp.
1280 NE 48th Street
Pompano Beach, FL 33064

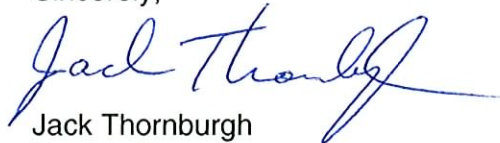
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Sincerely,



Jack Thornburgh
Branch Manager

cc: Jack Masella, Corporate EH&S
Karen Kantor, FDEP Permitting Coordinator