

Thursby, Kim

From: Jones, Carol (WT) [Carol.Jones@siemens.com]
Sent: Monday, December 03, 2007 10:26 AM
To: Epost HWRS
Subject: RE: Siemens Water Technologies, Corp., Pompano Beach;FLD 984 262 410;51348-HO-004;Notice of Deficiency

document has been received
Carol Jones, PE

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Monday, December 03, 2007 10:13 AM
To: Jones, Carol (WT)
Cc: Kantor, Karen E.; Winston, Kathy; Posner, Augusta; Neves, Richard; Wick, Fred; Grieco, Vincent (WT); beernie.korzekwinski@siemens.com; johnmyones@sbcglobal.net; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Siemens Water Technologies, Corp., Pompano Beach;FLD 984 262 410;51348-HO-004;Notice of Deficiency

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services

provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 3, 2007

SENT VIA E-MAIL
carol.jones@siemens.com

Carol Beth Jones, PE
Siemens Water Technologies, Corp.
105 South Alexander St.
Plant City, FL 33563

RE: Siemens Water Technologies, Corp., Pompano Beach
EPA I.D. No. FLD 984 262 410
Permit No. 51348-HO-004
Notice of Deficiency

Dear Ms. Jones:

The Florida Department of Environmental Protection (Department) has received your permit renewal application dated October 18, 2007 to operate a Used Oil and Material Processing Facility at 1280 Northeast 48th Street, Pompano Beach, Florida.

The review of the permit renewal application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies (two copies to Tallahassee and one copy to West Palm Beach district office) of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Carol Beth Jones, PE
December 3, 2007
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp
Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Kathy Winston, DEP/West Palm Beach, Kathy.winston@dep.state.fl.us
Agusta Posner, DEP/Tallahassee, agusta.posner@dep.state.fl.us
Richard Neves, DEP/Tallahassee, richard.neves@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Mr. Vincent Grieco, Siemens, Vincent.grieco@siemens.com
Beernie Korzekwinski, Siemens, beernie.korzekwinski@siemens.com
John Jones, Jones Echosystem Management/Miramar,
johnmyones@sbcglobal.net

ATTACHMENT
November 30, 2007
Siemens Water Technologies, Corp.
Pompano Beach, Florida
EPA I.D. No. FLD 984 262 410
Notice of Deficiency

1. **Certification:** Please provide a letter stating that Mr. Vincent Grieco, assistant Secretary is authorized to sign as Operator, Facility Owner and Land Owner.
2. **Figures:** All the drawings in the renewal application must be certified by a professional engineer registered in the State of Florida.
3. **Site Map and Tank Table:** Please provide a site map (8 ½"x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½"x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table can be attached to the permit. Also include hard copies of the map and tank table with your response.
4. **SPCC Plan:** Please note that SPCC plan must be updated in the appropriate areas when the two additional tanks are in place per 40 CFR 112.5(a). Plan and tanks must be certified by a professional engineer per 40 CFR 112.3(d). The facility will be required to update their financial assurance (increase to \$640,382.00 from \$604,083.00) before using the new tanks.
6. **Attachment 6, Preparedness and Prevention Contingency Plan:**

Security: No description of 24 hr surveillance required by 40 CFR Part 265.14(b)(1). Please revise as appropriate.

Arrangements with Local Authorities: No proof that Contingency Plan, SPCC, and Emergency Action Plan (which together make up the complete Contingency Plan) has been provided to appropriate authorities per 40 CFR Part 265.37.

Page 6-3: Please correct the mailing address and fax number for DEP Southeast district office as follows:

FDEP
400 N. Congress Ave., Suite 200
West Palm Beach, Florida 33401
Fax Number: (561) 681-6770

6-SPCC, page 2: Please correct the SED's Bureau of Emergency response address as follows:

Bureau of Emergency Response
7251 West Palmetto Park Rd., Suite 201
Boca Raton, FL 33433
(561) 393-5877

6-EAP (Emergency Action Plan), page 7: Last bolded sentences reads "If you Observe of Receive a Suspicious Looking Package or Letter", should read "If you Observe OR Receive...".

6-EAP, page 14, Section 6.18.2: Third sentence "It is important hat the impairment", should read "It is important that the impairment".

6-EAP, page 19: Wrong numbering missing a section 10.4.

6-EAP, page 21 and 22: Exhibits I and II are left blank, please review and revise as appropriate.

7. **Application for Permit to Construct, Operate or Modify a Waste Processing Facility, Tab Mat. Applic.:** The date fields are left blank. Please enter correct date in the date field.
8. **Closure of Tank Storage, page 8-2:** Maximum tank storage of 285,000 gallons for used oil appears to be incorrect. Please review and revise as appropriate.
9. **Attachment 8, Closure Plan, page 8-1:** The sentence in the first paragraph "under Rules 62-720..." should be changed to "under Rules 62-701..."
10. The application shall be processed to issue the permit to Siemens Water Technologies, Corp., not Hydrocarbon Recovery Services, Inc., unless Financial Assurance requirement issues are complied with by the permittee .