

Clean Harbors
ENVIRONMENTAL SERVICES, INC.
170 Bartow Municipal Airport
863-533-6111 xt:6319

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RCRA

AUG 22 2008

Hazardous Waste Regulation

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August 20, 2008

SENT VIA FEDEX

**Cover ltr and fee sent to FDEP PO Box in Tallahassee as directed.

BY: BSHW

Environmental Administrator
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

SUBJECT: Minor Modification – Universal Pharm Waste Mgt

Permittee: Clean Harbors Florida LLC
170 Bartow Municipal Airport
Bartow, FL. 33830
EPA ID No. FLD980729610
RCRA Permit # 64247-HO-009

Dear Dr. Kuncicky:

Clean Harbors Florida LLC. (CHF) is resubmitting this request for the purpose of revision/updating of the facility's Waste Analysis Plan as a minor modification (Not otherwise listed) as defined under FAC 62-730.290(4) and as a Class 1 permit modification as reflected under B.1.a. in Appendix I to 40 CFR 270.42.

None of the plan's substantive conditions are being changed. The only change is to page three of Chapt 2A Appx H (WAP) of the permit application and page 33 of 33 of the issued permit. (Attached). Please replace existing pages with these upon approval. The revision is necessary to ensure compliance with security access and control of Rx Drugs managed on site under the regulations, guidance and permitting rules found under FAC 64F-12.013 by exempting it from the WAP required sampling and testing onsite and to identify the storage location of UW Pharm on site.

If you have any questions concerning this matter, please contact me at (863) 519-6319.

Respectfully Submitted,



Steve Berman, CHMM
Environmental Compliance Manager

Cc: File

Email: Tim Bahr, Daniel Kuncicky, Anthony Tripp, James Dregne, Tara Swanson,
ENCL(s)

Summary of revision.

DEP Form 62-730.900(2)(d)

Revised pg 3 of 15 of existing approved WAP found in Chapt 2A Appx H (WAP) of the permit application.

Revision of pg 33 of 33 of existing permit issued #64247-HO-009.

August 20, 2008

CLASS ONE MODIFICATION SUMMARY

- Change facility WAP to reflect UW Pharm exempt from testing.

In order to manage UW Pharm on site we will require certification of inventory prior to acceptance. To comply with internal safety requirements and minimize any unauthorized access to such sensitive materials we will forbid / prohibit onsite access. Current Waste Analysis Plan requires sampling of incoming materials for conformance testing and in order to ensure we can implement the access restriction we need to specifically exempt this material from being opened on site.

- Change permitted roll off figure in permit issued.

The storage of UW Pharm (also known as "non viable Rx Drugs" under DOH regulations), requires secured storage with restricted access. In order to comply with the security and access requirements we will use a sealed "storage unit" know also as a "conex or sea container" which can be locked and access to it monitored and controlled. When storage of this material is required, the unit will occupy and be located in one of our RCRA permitted storage locations for our roll offs. We have numbered our locations on the revised facility plot to make identification and reference convenient.

Number one roll off storage area will be "interchangeable" with this UW Pharm storage unit. Meaning the area designated as roll off storage area number one will either be used for RCRA roll off storage as currently permitted or UW Pharm material storage, not both, hence there will be no increase in any waste storage volume on site. The RCRA roll off storage area numbered one is currently permitted for up to 40 cubic yards of RCRA solid waste. The UW Pharm storage unit is physically smaller and in no way will exceed capacity currently permitted for RCRA solid waste in that location.

quantity of waste than the whole container with the same characteristics of the whole contents. Containers of Universal Waste Pharmaceuticals received under our DOH Rx Restricted Prescription Drug Distributor – Destruction License will not be opened or sampled due to security access concerns. Content certification made by generator as required by DOH will be confirmed at final disposal facility.

2.3.2 Lab Pack and Paint Can Procedures

CHF also receives lab pack wastes and small cans of wastes (such as paint cans). The primary use of these wastes is for fuels. However should the waste not meet fuels specifications it will be reclaimed or shipped to an off-site permitted TSDF. This waste is shipped to CHF in small containers (ampoules to 5 gallon) inside larger containers. These wastes may be consolidated from the small containers into larger containers (typically 55 gallon drums). After the waste has been emptied into the larger container it is then sampled and analyzed.

The quality control procedure for a lab pack begins when the materials are packaged for shipment. Clean Harbors chemists who provide the packaging service are trained to follow the guidelines for lab packs. Each container is examined and the label verified prior to packaging. A packing list is prepared identifying the contents of every container packaged in the lab pack. CHF requires a packing list to be provided for each lab pack before the lab pack is received.

For the lab packs not packaged by Clean Harbors personnel, 10% of the lab packs are opened and the contents compared to the packing list to identify any discrepancies in quantity or identity. Should the contents in the container not match the description of same on the packing list, the discrepancy will be resolved with the generator or the lab pack could be rejected.

For small cans, as described in Chapter One, a packing list is not included. CHF, therefore, will sample a portion of these containers to verify the contents before they are emptied into a receiving drum. These waste streams are very consistent waste streams, so each container will not need sampling. The sampling procedures for sampling paint cans are given in Section 2.5.3.3.

2.3.3 In-Processing of Tank Trucks and Roll-offs

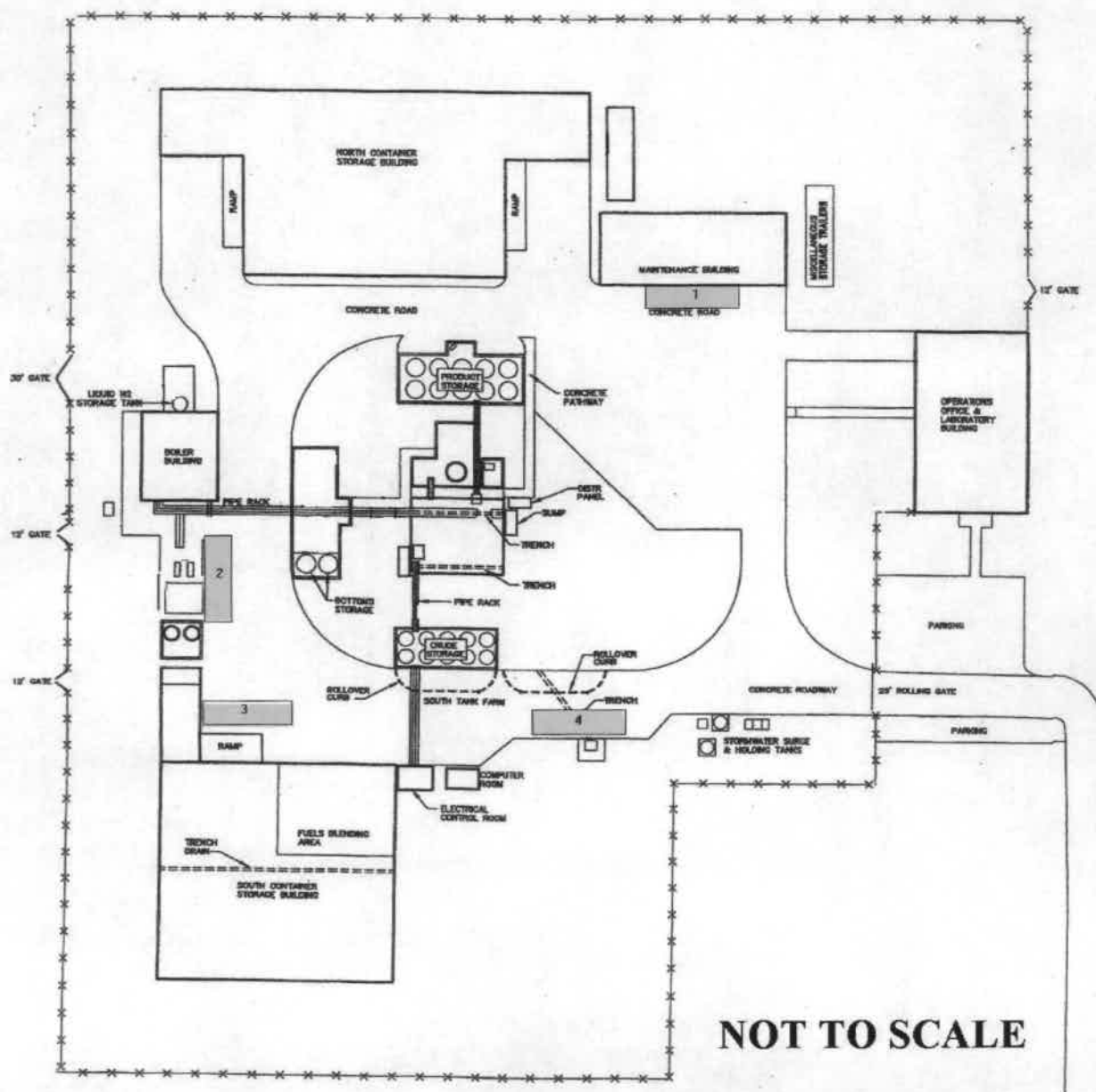
Documentation of the waste sample is initiated after a tanker is sampled. An internal process form is used to document this for all wastes received. An example of this form is presented in Figure 2.2. The sampling procedures for sampling these large bulk shipments are given in Section 2.5.3.2.

2.4 Waste Verification Methods, and Rationale

PERMITTEE:
Clean Harbors Florida LLC.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

I.D. NUMBER: FLD 980 729 610
PERMIT/CERTIFICATION NUMBER: 64247-HO 01-009
EXPIRATION DATE: DECEMBER 10, 2011

Attachment 6 – 40 Cubic Yards Rolloffs Storage



**DESIGNATED ROLLOFF
STORAGE AREAS**

REFERENCE DRAWINGS

AUG 2008 REV 1

REV. FOR APPROVAL DESCRIPTION

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Date	
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**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT CERTIFICATION
TO BE COMPLETED BY ALL APPLICANTS**

Signature and Certification

Facility Name CLEAN HARBORS FLORIDA LLC
EPA/DEP I.D. No. FLD 980 729 610

The following certifications must be included with the submittal of an application for a hazardous waste authorization. The certifications must be signed by the owner of a sole proprietorship; or by a general partner of a partnership; or by a principal executive officer of at least the level of vice president of a corporation or business association, or by a duly authorized representative of that person. If the same person is a facility operator, facility owner, and real property owner, that person can cross out and initial the signature blocks under "1. Facility Operator" and "2. Facility Owner," and add the words "Facility Owner and Operator" at the line "Signature of the Land Owner or Authorized Representative."

1. Facility Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, F.A.C., and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.

William F. Connors
Signature of the Operator or Authorized Representative*

William F. Connors, Sr. Vice President
Name and Title (Please type or print)

Date 8/18/08

Telephone (781) 792-5169

- Attach a letter of authorization

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2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or conduct remedial activities at a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection.

William F. Connors
Signature of the Facility Owner or Authorized Representative*

William F. Connors Sr. Vice President
Name and Title (Please type or print)

Date 8/18/08

Telephone (781) 792-5169

* Attach a letter of authorization

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit for the construction, operation or postclosure of a hazardous waste management facility on the property as described. For hazardous waste facilities that close with waste in place, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR 264.119 and 265.119, as adopted by reference in Chapter 62-730, F.A.C.

Cynthia L. Barrow
Signature of the Land Owner or Authorized Representative*

CYNTHIA L. BARROW Executive Director
Name and Title (Please type or print)

Date August 21, 2008

Telephone (863) 533-1195

* Attach a letter of authorization

Revision Number	
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4. Professional Engineer Registered in Florida

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(7), F.A.C.

This is to certify that the engineering features of this hazardous waste management facility have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature _____

Name (please type) _____

Florida Registration Number

N A

Mailing Address _____

street or P.O. Box

city

state

zip

Date _____

Telephone (____) _____

(PLEASE AFFIX SEAL)

Revision Number
Date
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5. Professional Geologist Registered in Florida

Complete this certification when required to do so by Chapter 492, F.S., or when not exempted by Rule 62-730.220(8), F.A.C.

This is to certify that the interpretations of geology at this hazardous waste management facility have been examined by me, and the interpretations conform to sound geological principles. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and the rules of the Department of Environmental Protection.

Signature _____

Name (please type) _____

Florida Registration Number NA _____

Mailing Address _____
street or P.O. Box

_____ city state zip

Date _____

Telephone (____) _____

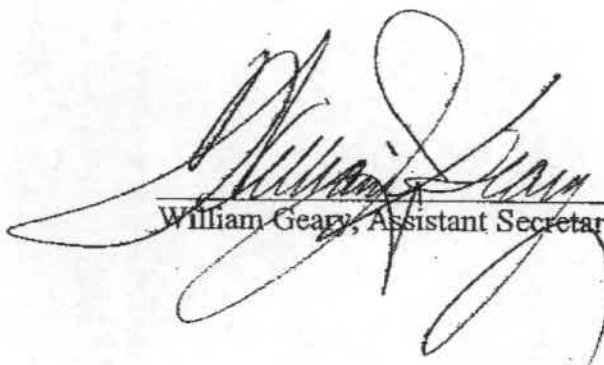
(PLEASE AFFIX SEAL)

Assistant Secretary's Certificate

I, William Geary, Assistant Secretary of Clean Harbors, Inc. and all of its subsidiaries listed on Exhibit A, certify that each corporate compliance and corporate health & safety person with the title of Vice President has the authority to sign and certify environmental documents, including but not limited to environmental reports, related to the operation of any and all of the subsidiaries listed on Exhibit A. I further certify, that each corporate compliance and corporate health & safety person with the title of Vice President has the authority to sign and certify permit applications related to the operation of any facility with more than 250 people or having gross annual sales or expenditures in excess of \$25 million dollars.

Witness the execution hereof under seal.

November 6, 2002



William Geary, Assistant Secretary

Exhibit A
to
Assistant Secretary's Certification
11-06-02

Company
Altair Disposal Services, LLC
Baton Rouge Disposal, LLC
Bridgeport Disposal, LLC
Clean Harbors Andover, LLC
Clean Harbors Antioch, LLC
Clean Harbors Aragonite, LLC
Clean Harbors Arizona, LLC
Clean Harbors Baton Rouge, LLC
Clean Harbors BDT, LLC
Clean Harbors Buttonwillow, LLC
Clean Harbors Canada, Inc.
Clean Harbors Chattanooga, LLC
Clean Harbors Chemical Sales, LLC
Clean Harbors Coffeyville, LLC
Clean Harbors Colfax, LLC
Clean Harbors Deer Park, LP
Clean Harbors Deer Trail, LLC
Clean Harbors Environmental Servies, Inc.
Clean Harbors Florida, LLC
Clean Harbors Grassy Mountain, LLC
Clean Harbors Kansas, LLC
Clean Harbors LaPorte, LP
Clean Harbors Laurel, LLC
Clean Harbors Lone Mountain, LLC
Clean Harbors Los Angeles, LLC
Clean Harbors Mercier, Inc.
Clean Harbors of Baltimore, Inc.
Clean Harbors of Braintree, Inc.
Clean Harbors of Connecticut, Inc.
Clean Harbors of Mexico, LLC
Clean Harbors of Texas, LLC
Clean Harbors Pecatonica, LLC
Clean Harbors Plaquemine, LLC
Clean Harbors PPM, LLC
Clean Harbors Quebec, Inc
Clean Harbors Reidsville, LLC
Clean Harbors San Jose, LLC
Clean Harbors Tennessee, LLC
Clean Harbors Westmorland, LLC
Clean Harbors White Castle, LLC
Crowley Disposal, LLC
Disposal Properties, LLC
GSX Disposal, LLC
Harbor Industrial Services Texas, LP
Hillard Disposal, LLC
Laidlaw Environmental Services de Mexico, S.A. de C.V.
Northeast Casualty Real Property, LLC
Roebuck Disposal, LLC
Sawyer Disposal Services, LLC
Tulsa Disposal, LLC
510127 N.B. inc.
Clean Harbors Lone Star Corp.



Bartow Municipal Airport and Industrial Park

September 20, 2006

To Whom It May Concern:

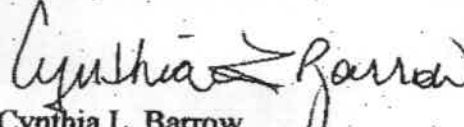
The Bartow Municipal Airport Development Authority was created by Legislation in 1967. The airport property is owned by the city of Bartow and per an agreement with the city and by city Ordinance (Section 203.1), the Airport Authority has exclusive rights to lease and develop the property, etc. I answer to an Airport Authority Board, which consists of the same five City Commissioners that were elected to the city of Bartow. When they meet on behalf of the Airport, they are considered Airport Authority Board members and when they meet to conduct city business, they meet as City Commissioners.

I personally was hired in 1976 and appointed as Executive Director in 1994. I have authorization to conduct and manage the Airport operations, including aviation and industrial park and more specifically with Clean Harbors – Bartow, Florida.

If additional information or verification is needed, please contact me or the Airport/City Attorney, Mr. George T. Dunlap, III, at 863/533-3146.

Very truly yours,

BARTOW MUNICIPAL AIRPORT DEVELOPMENT AUTHORITY



Cynthia L. Barrow
Executive Director