

## Thursby, Kim

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**From:** Epost HWRS  
**Sent:** Monday, September 15, 2008 11:46 AM  
**To:** 'emiranda@wpcorp.net'  
**Cc:** Winston, Kathy; 'johnmjonespe@sbcglobal.net'; Wick, Fred; Posner, Augusta; 'dvanlanding@broward.org'; Martin, Lee; 'steve.brown@dep.state.fl.us'; Bahr, Tim; Neves, Richard; Kothur, Bheem  
**Subject:** World Petroleum Corporation;FLD 980 709 075;54228-HO-003;Notice of Deficiency  
**Attachments:** 9-15-08-World Petroleum NOD Cover Letter (Draft 2).pdf

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](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). 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](http://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](mailto:epost_hwrs@dep.state.fl.us)

**Tracking:**

Recipient	Delivery	Read
'emiranda@wpcorp.net'		
Winston, Kathy	Delivered: 9/15/2008 11:47 AM	
'johnmjonespe@sbcglobal.net'		
Wick, Fred	Delivered: 9/15/2008 11:47 AM	Read: 9/16/2008 8:41 AM
Posner, Augusta	Delivered: 9/15/2008 11:46 AM	Read: 9/15/2008 1:27 PM
'dvanlanding@broward.org'		
Martin, Lee	Delivered: 9/15/2008 11:47 AM	
'steve.brown@dep.state.fl.us'		
Bahr, Tim	Delivered: 9/15/2008 11:47 AM	
Neves, Richard	Delivered: 9/15/2008 11:47 AM	Read: 9/15/2008 12:51 PM
Kothur, Bheem	Delivered: 9/15/2008 11:47 AM	



# 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

September 15, 2008

**SENT VIA E-MAIL**  
[emiranda@wpcorp.net](mailto:emiranda@wpcorp.net)

Mr. Eric Miranda, President  
World Petroleum Corporation  
3650 SW 47<sup>th</sup> Avenue  
Davie, FL 33314

RE: World Petroleum Corp.  
EPA I.D. No. FLD 980 709 075  
Permit Number: 54228-HO-003  
Used Oil Processing Facility Permit  
Notice of Deficiency

Dear Mr. Miranda:

The Florida Department of Environmental Protection (the Department) has received your permit renewal application dated August 8, 2008 to operate a Used Oil Processing facility at 3650 SW 47<sup>th</sup> Avenue, Davie, Florida, 33314.

The review of the permit renewal application indicates that it is incomplete. Please provide the information requested in the enclosed attachment. 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 of your written response (two copies to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southeast District office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Eric Miranda, President  
September 15, 2008  
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rick Neves at (850) 245-8755, e-mail: [richard.neves@dep.state.fl.us](mailto:richard.neves@dep.state.fl.us).

Sincerely,



Bheem Kothur, P.E. III  
Hazardous Waste Regulation

BK/rn

Enclosure: Attachment

cc: Kathy Winston, DEP/West Palm Beach, [kathy.winston@dep.state.fl.us](mailto:kathy.winston@dep.state.fl.us)  
John Jones, Jones Ecosystem Management/Miramar, [johnmjonespe@sbcglobal.net](mailto:johnmjonespe@sbcglobal.net)  
Fred Wick, DEP/Tallahassee, [fred.wick@dep.state.fl.us](mailto:fred.wick@dep.state.fl.us)  
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Lee Martin, DEP/Tallahassee, [lee.martin@dep.state.fl.us](mailto:lee.martin@dep.state.fl.us)  
Steve Brown, DEP/West Palm Beach, [steve.brown@dep.state.fl.us](mailto:steve.brown@dep.state.fl.us)

**ATTACHMENT**  
**September 15, 2008**  
**World Petroleum Corporation (WPC)**  
**Davie, Florida**  
**EPA I.D. Number: FLD 980 709 075**  
**Notice of Deficiency**

**GENERAL COMMENTS**

1. Site Maps: Please identify all tanks on all site maps and provide these maps in both hard copy (8½" x 11") and electronic format (PDF). Please also provide larger hard copy versions of all three site maps:

- a) Map A1.1 (follows page 31)
- b) Map A2.1 and map A3.1 (both of which follow page 52)

2. Page 23, Table 3.2, Oil Storage Locations: Please revise this table to include size, capacity, and date of installation for all tanks on site. Please submit this table in both hard copy (8½" x 11") and electronic format (PDF).

3. Please identify the location of any and all solid waste processing operations on all maps.

**SPECIFIC COMMENTS**

**Part I A. General Information**

1. Page 1, item 4: Please check and provide the correct date that the current operation began (is it in 1960 or 1983?). See also the Departments comments on the SPCC plan, page 20, where the Date of Operation is given as August, 2007. Please revise the date of operation as appropriate and be consistent throughout the application.

**Part 1B, Site Information**

1. Page 2, item 1, Facility Location: Please provide the Section/Township/Range information.

**Part 1C: Operating Information**

1. Page 3, item 1: Please identify the hazardous waste status as appropriate; not all three.

## **Attachment A: Description of the Facility Operation**

1. Page 9: Please describe any on-site treatment you may perform to the used oil, used oil filters, sorbents, sludges and anti-freeze.
2. Page 9: Is WPC managing Petroleum Contact Water (PCW)? If so, please provide a description of how this material will be managed by WPC, including how WPC will comply with the applicable requirements of Rule 62-740, F.A.C.

## **Attachment B: Process Flow Description**

1. Page 10, fourth paragraph: Please provide either a detailed description of the procedures for “on-spec” testing or, if thoroughly explained in the Analysis Plan, provide reference here to that plan.

## **Attachment C: Waste Analysis Plan**

1. General comment on the Waste Analysis Plan: Please include a description of the best methods used to test for all of the chosen parameters, as per the requirements of 40 CFR, Part 264.13(b)(2).
2. Page 12, Procedures, item 1: Please provide a copy of the record keeping form used by the driver indicating the result of the halogen screening at the pick-up site, as per the requirements of Rule 62-710.510(2), F.A.C.
3. Page 12, Procedures, item 1, paragraph 2 of this section: Please explain in detail how and how often the Tiff 5050 is calibrated. Please define “elevated reading.” Please describe in detail the field sampling procedures.
4. Page 12, Procedures, item 1, paragraph 4 of this section: Please describe how a “rebuttable presumption test” is performed.
5. Page 12, Procedures, item 1, paragraph 5 of this section: please correct “reputable” to read “rebuttable.”

6. Page 13, Procedures, Item 2, first paragraph: API/MPMS, Chapter 8.1, reference is not sufficient for sampling description and procedure. Please explain in detail the sampling procedure.

7. Page 13, Procedures, item 2, paragraph 3 of this section: If used oil contains > or = 1,000 PPM, "Salt Extraction" test is conducted. Is this an appropriate test? Please explain in detail.

8. Page 13, Procedures, item 3, first paragraph of this section: The testing to determine whether or not used oil meets the fuel specifications of 40 CFR, Part 279.11 need not be done prior to processing. The specification determination is not applicable for re-refining used oil. World Petroleum Corp. has not indicated that it is re-refining used oil back into a lubricant. Only the rebuttable presumption is required prior to processing. Once the used oil has been processed, tested, and shown to meet the fuel specification, the used oil is no longer subject to 40 CFR, Part 279. Please clarify the procedure used by World Petroleum Corp. to test for the used oil fuel specification.

9. Page 14, On-specification table: Please change the records retention sentence below the On-specification table to read: "... must be retained for at least five years" (not three years, as stated in the application).

#### **Attachment D: Sludge, Residue and Byproduct Management Description**

1. WPC states, in Attachment A of this application, that it collects absorbents and sludges. Please include a detailed description of how such wastes are sampled, analyzed and managed.

2. Page 15: Please correct the Rule citations in the last sentence to read as follows:

a) 62-710.800(9), FAC should read as 62-710.800(5), FAC

b) 62-761.800(5), FAC should read as 62-762.800(1), FAC

#### **{Attachment F, not identified as such in the application}: World Petroleum Corp SPCC Plan**

##### General Comments Regarding WPC's SPCC Plan

1. Page 17: Please label the SPCC plan as Attachment F, as listed in the application Form.

2. Please address the hazardous assessment and control of fires and explosion in the SPCC plan, in accordance with the requirements of 40 CFR, Part 270.14(b)(7) and Parts 264.50 through 264.56.

3. In accordance with the provisions of 40 CFR, Part 264.34(a), included in the SPCC document should be information pertaining to what type of internal communications or alarm system is in place to provide immediate emergency instructions to facility personnel. This equipment should also be part of the general facility inspection requirements per 40 CFR, Part 264.15(a) & (b).

#### Specific Comments Regarding WPC's SPCC Plan

1. Page 20, Date of Operation: Please clarify the date of operation as appropriate: Is it 1960, 1983 (see Page 1, Item 4), or August 2007 as stated on this page? Please revise the date of operation as appropriate and be consistent throughout the application.

2. Page. 20: Please provide the home address of Eric Miranda.

3. Page 23, Table 3.2: The existing permit addresses 14 tanks. The renewal permit application addresses only 10 tanks. Please explain which tanks were taken out of service or closed and revise the table and maps as appropriate. Please revise the closure plan to reflect the closed tanks and submit a closure report.

4. Page 24, Section 6.0, Inspection, Tests and Records: Please provide a description of weekly container inspections, as per the provisions of 40 CFR, Part 264.174 and 62-730.160(6).

5. Page 26, Section 10.4, Waste Disposal: Please provide a process flow diagram.

#### **Appendix A: Site Map**

1. Please provide Tank Relocation/Dismantling/ Testing/ and In-service Schedules.

#### **Appendix F: Calculation of Secondary Containment Capacity**

1. Secondary Containment Calculations: Please review the calculations and revise document as follows:

Item 1: Total containment volume of 58,970 should read 58,972

Item 3: 60,256 should read 58,970; and 38,765 should read 37,480

Item 4: 38,765 should read 37,480; and the factor of safety indicated as 1.29 should read 1.25



2. Conclusion: Please correct the Rule citation to read: Rule 62-762 F.A.C. instead Rule 62-761 F.A.C.

#### **Appendix G: Records of Tank Integrity and Pressure Tests**

1. Page 37: The facility must provide documentation of the last detailed inspection and certifications for all tanks to the Department. Tanks appear to be more than 25 years old. Provide documentation of when the last thickness test and tank system integrity assessment was performed by a professional engineer registered in the State of Florida. Also, facility must specify in the application the frequency of sludge removal from the tanks. Please provide documentation and record of Tank Integrity and Pressure Tests in accordance with API 653.

#### **Appendix H: Emergency Contacts**

1. Appendix H, page 38: The emergency notification list does not include the numbers of closest hospital or police department, only fire rescue and there is no proof of a coordination agreement with these outside agencies per 264.53. Generally certified return receipt showing the Contingency Plan has been provided to these facilities is acceptable to meet this requirement.

2. Appendix H, page 38: On the emergency notification list, the number given for FDEP is that of the West Palm Beach office. Instead, it should be the number of our BER office in Boca Raton (561-393-5877). Please revise as appropriate.

#### **Attachment G: Description of the Facilities Unit Management for Tanks and Containers...**

1. Page 45, first paragraph, third sentence: Please edit "Attachment 5, SPCC Plan" to read "Attachment F, SPCC Plan."

#### **Attachment H: Facility Closure Plan**

1. Page 49, first paragraph, second sentence: Please delete the typo "re 1." which follows the address.

2. Page 49, first paragraph, third sentence: Please correct the Rule citation as follows: "62-710.800(9)(a)" to read "62-710.800(5)".

3. Page 50, Facility Closure Procedures, first paragraph: Please correct the Rule citation as follows: "62-710.800(9)(a)" to read "62-710.800(5)".
4. Page 50, Facility Closure Procedures, second paragraph: Please correct the Rule citation as follows: change "62-761.800(5)" to read "62-762.801"
5. Page 51, first paragraph, second sentence: Please change "...in accordance with Rule 62-780," to read "...in accordance with Rule 62-777 and Rule 62-780"
6. Page 51, Closure Cost Estimate: Please provide a current detailed closure cost estimate or attach the approved closure cost estimates.
7. The facility must update the closure plan to reflect the location of all existing tanks and describe any proposed new tank locations in the closure plan.

**Attachment I – Training Plan (Labeled in the Application as Appendix I)**

1. Page 52: Please label this portion of the application: "Attachment I – Training Plan."
2. Page 52: Please provide the training plan for Solid waste processing facility in accordance Rule 62-701.320(15)(a).