



Florida Department of Environmental Protection

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June 22, 2009

Sent Via e-Mail

Catherine.mccord@crystal-clean.com

Catherine A. McCord
Environment, Health and Safety
Heritage-Crystal Clean
2175 Point Blvd, Suite 375-EHS
Elgin, IL 60123

Subject: Hazardous Waste Transfer Facility Initial Notification dated March 19, 2009.

Ms. McCord:

As additional information to your submittal for a hazardous waste transfer facility application please incorporate the attached comments regarding documents previously submitted. If you have any questions or require additional information please contact me at (850) 245-8766 or Anthony.tripp@dep.state.fl

Sincerely,

Anthony R. Tripp, Ph.D., P.E.
Hazardous Waste Permitting

cc:

Ashwin Patel, DEP Northeast District, Ashwin.patel@dep.state.fl.us
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Heritage Crystal Clean Transfer Facility Notification – 103rd Street in Jacksonville

The facility should revise the Closure Plan, Contingency Plan, and any other documentation that is site specific to the Jacksonville facility instead of submitting documents that refer to the Port Everglades facility.

The following items are still needed to complete the Transfer Facility Notification for the Jacksonville 103rd Street facility:

1. Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), FS. The certification shall state a factual basis for the conclusion that the location criteria are met, and how those facts were determined.
2. Evidence of the transporter's financial responsibility as required under subsection 62-730.170(3), FAC were not in the submitted package.
3. The closure plan submitted does not satisfy the closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112, 265.114, and 265.115. The following items, specifically, were missing from the plan:
 - 265.112(b) - Content of Plan
 - a. How and where final waste will be disposed of.
 - b. How the storage and containment system will be evaluated and decontaminated.
 - c. Confirmatory soil sampling at the time of closure.
 - d. Contingent soil and groundwater sampling if initial soil sampling shows contamination.
 - e. Full closure as a unit and post closure care if all of the contaminated soils cannot be removed and groundwater is contaminated.
 - f. A maximum inventory and type of waste stored.
 - g. A schedule of closure from the receipt of the last shipment.

265.115 - Closure certification must be submitted within 60 days of completion of closure activities.

Under the "Closure Cost Estimates" section of the submittal, the facility is referred to as the "Port Everglades 10-day transfer facility."

4. The packet did include a brief general description of the transfer facility operations, which included the requirements listed in Rule 62-730.171(3)(a)(4), FAC, but the description was missing the anticipated waste codes.
5. A copy of the facility's Contingency Plan was submitted, however it did not include the following required information:
 - a. Description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, state and local emergency response teams to coordinate emergency services, pursuant to 265.37. [265.52(c)]

- b. Emergency Coordinators (primary or otherwise) with their phone numbers and addresses. [265.52(d)]
- c. List of all emergency equipment at the facility, such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. Plan should include the location and a physical description of each item on the list, as well as a brief description of its capabilities. [265.52(e)]
- d. Evacuation plan for facility personnel, including signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes. [265.52(f)]

In addition to these items, the section titled "Contingency and Spill Response Plan Site-Specific Supplement – Jacksonville, Florida" had a sub-section that was titled "Section 7: Site Specific Supplement – Port Everglades, Florida." HCC should revise this supplement to reflect the Jacksonville facility. Also, the supplement seems to have been cut off, with the final sentence reading, "Under certain circumstances, employees will be directed by a corporate EHS manager to perform limited spill cleanup activities, depending upon material spilled and " HCC should submit the remainder of this document for review.

- 6. The maps that were submitted are not up to date. During the inspection of the facility on 6/1/09, an updated map was observed inside the aluminum/metal shop that depicted different structure placement than the maps that were submitted in the packet. The updated map should be submitted to the Department for review.