

Thursby, Kim

From: Tripp, Anthony
Sent: Monday, November 02, 2009 2:46 PM
To: Thursby, Kim
Subject: FW: e-mail receipt

Kim,
Use this as confirmation of the e-posts of October 21, 2009 to the Jacksonville facility FLR000154278 and the Port Everglades facility FLR000120014.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

From: McCord, Catherine [mailto:Catherine.McCord@Crystal-Clean.com]
Sent: Monday, November 02, 2009 2:30 PM
To: Tripp, Anthony
Subject: RE: e-mail receipt

I will send an email. I was out on Friday and did not read the email from the department. I did read the earlier emails.

Catherine A. McCord
Vice President - Environment, Health, and Safety
Heritage-Crystal Clean, LLC

2175 Point Blvd, Suite 375
Elgin, Illinois 60123

catherine.mccord@crystal-clean.com
www.crystal-clean.com

(O) 847-783-5949
(C) 847-226-0756

From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Monday, November 02, 2009 11:37 AM
To: McCord, Catherine
Subject: e-mail receipt

Catherine,

DEP sent e-posts to Heritage-Crystal Clean on October 21, 2009 (one each for the Jacksonville facility and the Port Everglades facility) and on October 29, 2009 for the Tampa location. The person who tracks these e-mails has informed me that as of today there has not been a reply that you have received the e-mails. These receipts are part of our document tracking system. I would appreciate it if you could reply, either individually to each e-mail, or collectively to this e-mail, that you did receive these e-mails.

Thank you.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

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.

Thursby, Kim

From: Epost HWRS
Sent: Wednesday, October 21, 2009 8:40 AM
To: 'Catherine.mccord@crystal-clean.com'
Cc: Patel, Ashwin; Perry, Jenna D.; Posner, Augusta; Bahr, Tim; Tripp, Anthony
Subject: Heritage Crystal Clean – Jacksonville;FLR000154278;Hazardous Waste Transfer Facility Initial Notification Supplemental Material of September 24, 2009.
Attachments: 10-21-09-Heritage Crystal Clean-FDEP reply to Sept 24, 2009 HCC response.pdf-Receipt.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. (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.

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



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

October 21, 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: Heritage Crystal Clean – Jacksonville, Florida. FLR000154278
Hazardous Waste Transfer Facility Initial Notification Supplemental Material of
September 24, 2009.

Ms. McCord:

The Florida Department of Environmental Protection (DEP) has reviewed the information submitted by Heritage Crystal Clean in response to letters from the Department dated June 10th and 22nd, 2009. The DEP has the following attached comments on Heritage Crystal Clean's September 24, 2009, submittal regarding its Transfer Facility Notification for its 103rd Street facility in Jacksonville, FL.

Approval of the 10-day hazardous waste transfer facility is pending submittal and approval of the attached items. Please submit these requested items within 30-days of receipt of this letter. If you have questions regarding these comments please contact me at 850-245-8766 or

Anthony.tripp@dep.state.fl.us

Sincerely,

Anthony R. Tripp, Ph.D., P.E.
Hazardous Waste Regulation, Tallahassee

cc: Ashwin Patel, DEP Northeast District, Ashwin.patel@dep.state.fl.us
Jenna Perry, DEP Northeast District, jenna.d.perry@dep.state.fl.us
Agusta Posner, OGC Tallahassee, agusta.posner@dep.state.fl.us

3. a. 40 CFR 265.112(b)(3) – “An estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility *and a detailed description of the methods to be used during partial and final closure, including, but not limited to methods for removing, transporting, treating, storing or disposing of all hazardous waste*, identification of and the type(s) of off-site hazardous waste management unit(s) to be used, if applicable;” (emphasis added)

The facility’s submittal states, “The closure plan indicates that the waste will be sent to off-site third parties.” After a thorough review of the closure plan submitted by the facility, no such reference was found. Are these third parties mentioned in the closure plan permitted to accept hazardous waste?

b., c., d., e. The facility should include, as part of its closure plan, a plan for the visual inspection of the facility to determine if any visible staining or contamination is present at the time of closure. In addition, a review of the facility’s spill history should also be done at the time of closure. The closure plan should state that if either of these two activities reveals a release to the environment, then the facility will submit a soil sampling plan to determine whether contamination is present. Also, if the facility changes its practice to bulk waste at the site, the facility should develop and submit a detailed closure plan.

f. The submitted closure plan does not address the type of waste that will be at the facility; however, the DEP accepts the waste codes submitted under section 4 of the facility’s September 24, 2009, submittal.

5. The Contingency Plan submitted on September 24, 2009, was a plan for the Ft. Lauderdale, Florida facility. The Jacksonville facility should have a separate, site-specific plan, as requested in the DEP’s June 22, 2009, letter.

a. The arrangements letters provided in submittal were sent to Broward County Fire Rescue, Broward County Sheriff, and Sunshine Medical Center. These agencies are located in Ft. Lauderdale, FL, and likely would not respond to an emergency situation in Jacksonville, FL. Emergency arrangements letters should be sent to local authorities in Duval County as detailed in the DEP’s June 22, 2009, letter.

- b.** The emergency coordinators given were Johnny Reyes and Billy Hurin. Neither of these individuals could respond to an emergency at the Jacksonville facility within a short period of time as required in 40 CFR 265.55.
 - c.** A Jacksonville facility site-specific list of emergency equipment should be provided, as described in section 5.c. of the DEP's June 22, 2009, letter.
 - d.** An evacuation plan is required as part of a Contingency Plan under 40 CFR 265.52(f).
- 6.** The site diagrams provided in Attachment E of the September 24, 2009, letter were the same maps that were originally submitted to the DEP in the facility's initial Transfer Facility Notification package. The facility is requested to provide updated maps as described in the DEP's June 22, 2009, letter.