

## Thursby, Kim

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**From:** Berman, Stephen [berman.stephen@cleanharbors.com]  
**Sent:** Friday, August 05, 2011 9:33 AM  
**To:** Epost HWRS  
**Cc:** Bahr, Tim; Dregne, James; Echevarria, Edgar; BOSEK, JOHN E; Camp, Shannon D.; Russell, Merlin; Tripp, Anthony  
**Subject:** RE: Clean Harbors Florida, LLC, FLD 980 729 610;First Notice of Deficiencies

Receipt of document :1<sup>st</sup> NODs - Confirmed.

*Steve*

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**From:** Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]  
**Sent:** Friday, August 05, 2011 8:06 AM  
**To:** BOSEK, JOHN E  
**Cc:** Bahr, Tim; Berman, Stephen; Dregne, James; Echevarria, Edgar; Camp, Shannon D.; Russell, Merlin; Tripp, Anthony  
**Subject:** Clean Harbors Florida, LLC, FLD 980 729 610;First Notice of Deficiencies

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.

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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)

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# Florida Department of Environmental Protection

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2600 Blair Stone Road  
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Governor

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Secretary

August 5, 2011

**Sent Via E-mail**

[Bosekj@cleanharbors.com](mailto:Bosekj@cleanharbors.com)

Mr. John Bosek  
Clean Harbors Florida, LLC  
170 Bartow Municipal Airport  
Bartow, Florida 33830

**Subject: Clean Harbors Florida, LLC, FLD 980 729 610  
Operating Permit No. 64247-HO-009  
Polk County  
First Notice of Deficiencies**

Dear Mr. Bosek:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-730.220 and Chapter 403.722, Florida Statutes (F.S.).

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be schedule as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

An official response to these comments is due within thirty (30) days of receipt of this document. Additional time can be granted if it becomes apparent during the response process that more time is needed.

Mr. John Bosek  
August 5, 2011  
Page 2 of 14

If you would like to arrange a meeting or have any questions, please call me at 850-245-8796 or [merlin.russell@dep.state.fl.us](mailto:merlin.russell@dep.state.fl.us)

Sincerely,



Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation

MR/mdr  
Enclosure

cc via e-mail w/enclosure:

Stephen Berman, Clean Harbors, [berman.stephen@cleanharbors.com](mailto:berman.stephen@cleanharbors.com)  
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**ENCLOSURE**  
Clean Harbors Florida, LLC  
Operating Permit No. 64247-HO-009  
Polk County

**General Comments:**

1. Any revisions to the Part B in one location must be done throughout the document. It is the responsibility of Clean Harbors to ensure changes are made throughout the Part B.
2. Revised pages or sections can be submitted to replace pages in the 2/14/11, Revision 0 Part B. Any revisions must be identified as Revision 1 on each page.
3. A "solid waste management unit" (SWMU) includes any unit which has been used for the treatment, storage, or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste including RCRA regulated hazardous waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (e.g., product or process spills).

**Specific Comments:**

(Page/paragraph or section)

**Part I**

4. Part I.A.11 and 12: The Operator's and Owner's name and telephone number are inconsistent with the name and phone number on the certification page. Michael Crisenbery (513-823-2280) signed the certification as the facility operator and owner. His name, address and phone number need to be used in A.11 and A.12.
5. Part I.A.17: Complete the information on the engineer of record
6. Part I.A.19: The "RCRA" permit and "HSWA" permits are the same permit. The state issues an operating permit that contains the HSWA corrective action requirements; hence, the hazardous waste permit only needs to be listed once. In addition verify that the permit numbers for the FDEP storage tanks, the USDA APHIS permit and SWFWMD are correct as the permit numbers in the application are different than the permit numbers on your online Fact Sheet (as of June 30, 2011) located at:  
[http://clark.cleanharbors.com/ttServerRoot/Download/13134\\_FINAL\\_Bartow\\_FL\\_Facility\\_FS\\_100208.pdf](http://clark.cleanharbors.com/ttServerRoot/Download/13134_FINAL_Bartow_FL_Facility_FS_100208.pdf)

7. Part I.B.1: The Section/Township/Range is no longer required but the Method and Datum must be provided as required.

8. Part I.B.3: Facility Drawing/Plot Plan Chapter 1, Appendix A

1. The scale on this figure (1"=60') is inconsistent with South Container Storage Building Layout, Figure F-1.5. On Appendix A, the western side of the building is approximately 70' in length but on Figure F-1.5 the western side is 120'. Correct the discrepancies.
2. The "Rolloff Storage" locations are not consistent with Figure 18.5.3 that identifies the "Designated Roll-off Areas".
3. The legend identifies an Air Emission Stack but it is not located on the figure.
4. In the legend, the Roof Line and Containment Area use the same symbol (a black line). If the original drawing was colored to differentiate the symbols, then submit an updated, colored figure.
5. Need to indicate location of Hazardous Waste Transfer area on this and other appropriate figures throughout the application.

9. Part I.B.3: Appendix C does not illustrate traffic patterns-Appendix C is "Description of Operation". Part I.B.3 of the permit application requires a scale drawing showing the hazardous wastes traffic pattern including the estimated volume and control.

10. Part I.B.4: Appendix D (the topographic map) is missing [Note: There is an Appendix D.1 "Physical Setting Source Map" that may have been intended but its clarity as a topographic map is of poor quality]. Part I.B.4 requires a topographic map which show all the features indicated in the instruction sheet for this part [Note: multiple maps are acceptable].

### **Part I.D Operating Information**

11. I.D.3: The Table should reference Appendix II-G rather than Appendix G.

### **Chapter 1 Appendix C, Description of Operation**

12. I-C.1.1.1, paragraph 5 and Figure F-1.3: This paragraph discusses the offsite disposal of the crushed cans. Although (presumably) the waste cans meet the definition of RCRA empty, the cans themselves need to be characterized. It would be appropriate to include procedures for the characterization of the crushed cans even if it is as simple as using generator knowledge.

13. I-C.1.1.2, paragraph 3: Referenced Section F-1.2 is missing

14. I-C-1.2.4, paragraph 2: Referenced Section F-1.4.3 is missing

15. Figures F-1.5 and 7.1: Is the grinder located in the Legend actually represented by the  symbol in the figure?

16. Appendix D.1 should be labeled Known Water Wells. It would be very appropriate to identify the location of the Clean Harbors facility on the figure. It is unclear why many of the icons and descriptors in the legend do not appear on the figure. It is also unclear what the numbers (some are illegible) next to the "Water Wells" and "Public Water Supply Wells" represent. In the legend, what does "Cluster of Multiple Icons" represent? Also, the black dot is indistinguishable from the black dot used for sinkholes. The Department recommends cleaning up the figure. First, the information for the figure must be clear and legible. Secondly, unnecessary information should be eliminated.

## **Part II A. General**

17. Part II.A.1.a; 270.14(b)(19): A topographic map showing the facility and a distance of 1000 feet around it must be submitted. The topographic map (Appendix II-A) does not illustrate the area 1,000' to the east. Also, the figure does not include a legend.

18. Part II.A.1.a and A.1.a(7); 270.14(b)(19): A topographic map (using an appropriate scale) illustrating the contours sufficient to show surface water flow in the vicinity of and from each operational unit was not submitted. Part II.A.3 requires a topographic map showing a distance of 1,000 feet around the hazardous waste management area at a scale of 1 inch to 200 feet. Contours must be shown on the map with intervals sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility (e.g., contour intervals of 5 feet if relief is greater than 20 feet or an interval of 2 feet if relief is less than 20 feet). The maps should clearly show scale, date and 100-year flood plain level. The scale on Appendix E appears incorrect.

19. Part II.A.1.a(5); 270.14(b)(19)ix: Onsite and offsite injection & withdrawal wells were not identified. If there are none, this can be noted in the text.

20. Part II. A.1.a(9); 270.14(b)(19)xi: A map illustrating barriers for drainage or flood control was not submitted.

21. Part II.A.1.a(11): A map showing the runoff control system was not submitted. Much later, Section 9.10 of the Closure Plan discusses the paved, curbed roadway surrounding the facility. It would be appropriate to include this information earlier in the application, along with the map.

22. Part II. A.8: Indicate all other federal laws that may apply to the issuance of the permit according to 270.3.

## Appendix II-D Cost Estimate and Financial Assurance

23. Page 19 of 24 refers to Attachment 2, but it was not included. Submit Attachment 2.

24. **Appendix II-F.2 The Contingency Plan** (Note: the CP can be combined with the Prevention & Preparedness Plan as there are similar requirements in each):

1. A facility layout map that meets the requirements of 40 CFR Part 264.37(a)(1) is required for first responders. The figure(s) should clearly identify the locations of products and wastes, and their general hazard type (e.g., storage of flammable hazardous waste, used oil storage, pressurized gas tanks, fuels blending area, etc.).
2. Section 2.1.2: Your RCRA permit requires notifications to the Department under certain emergency circumstances. The requirements of General Condition 8.c include verbal and written notifications with deadlines for any noncompliance that may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies or the occurrence of a fire or explosion from the facility that could threaten the environment or human health outside the facility. These requirements should be included in the CP.
3. Section 2.1.2, page 1, paragraph 2 identifies notification for the Polk County Fire Department. Is this department different from the Polk County Fire Services identified on Figure 6.10 (The telephone numbers are different)? If there are inconsistencies here, they must be corrected.
4. Section 2.1.2, page 3, paragraph 5: This paragraph states that discarded protective clothing will be containerized and sent to a permitted TSDF. This is acceptable but unnecessary if the clothing does not meet the definition of a hazardous waste. By keeping the language as is in the CP, CH will be required to ship off the discarded protective clothing as a hazardous waste.
5. Section 2.1.2, Page 4, paragraph 1: Your permit (General Condition 8.c) requires a written report to DEP within 5 days for noncompliance which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility.
6. Section 2.3.2, page 5, paragraph 3: Figure 6.7 is missing from the CP. Also, this paragraph discusses fire hydrants with foam capabilities. Later in the application, 6.0 (7) on page 10 of 22, a foam-generating fire suppression system is discussed. Are these hydrants and those systems the same or is clarification required?
7. Section 3.0: In addition to a copy of the CP being maintained on site, a copy should be kept at a nearby location or be readily available in the event that the onsite CP cannot be accessed.
8. Based upon EPA's guidance entitled *Preparedness and Prevention Requirements for RCRA TSDFs (Response to Chemical Safety Board Recommendation 2007-01-I-NC)*, FDEP is recommending that the plan be reviewed at least annually. We plan to have such



- a requirement in your new permit. In addition, we plan to require that an electronic copy (and subsequent revisions) be submitted to first responders each time a revision is approved (The agencies identified in Figure 6.10).
9. Section 2.4, page 6: The secondary evacuation routes (the east and west gates) are normally locked. Are the locks combination locks? If not, the CP should discuss how keys will be easily accessed.
  10. Figure 6.6 should be updated to identify the locations of fire hydrants (and the two with foam capabilities) discussed in Section 2.3.2, page 5, paragraph 3, First Aid Kits (Section 2.3.1, paragraph 1) and the Emergency Response Cabinets discussed in Section 2.3.1. The figure needs to identify the "H" and insert it into the Legend.
  11. Appendix II-F.3 contains information required in the CP. This Appendix must be integrated into the CP as the CP should be a stand-alone document.
  12. Similarly, there is some redundancy between the CP and Preparedness and Prevention Plan. Our recommendation would be to consolidate plans.
  13. The CP must be updated to address hurricanes. You should visit EPA's *As Hurricane Season Begins: A Reminder to Minimize Process Shutdown Related Releases and to Report Releases In a Timely Manner*, located at:  
[http://www.epa.gov/region4/r4\\_hurricanereleases.html](http://www.epa.gov/region4/r4_hurricanereleases.html) for information on hurricane preparedness and EPA requirements.

### **Appendix II-F.5 Personnel Training**

25. Page 1, paragraph 3 should also include the proper operation of trucks, forklifts, or any other machinery used in waste management.
26. Page 2, paragraph after the 18 training topics: The examples of training these employees receive seem inaccurate. Although every position should have training in the CP and emergency procedures, why would, for example, the lawn care or janitorial positions require training in manifests and land ban forms or waste tracking and transportation? Also, the paragraph states that truck drivers and lab employees are not routinely involved in the day-to-day waste handling. This is not an accurate statement.
27. The minimum training should explicitly identify the 40-hour or 8-hour refresher HAZWOPER training (29 CFR 1910.120) or the hazard communication program (29 CFR 1910.1200).
28. Section 2.0 Training Documentation: If on-the-job training (OJT) is used as a substitute for, or supplement to, formal classroom training, the content, schedule, and techniques to be used in the on-the-job training program must be described in the training records maintained at the facility
29. Section 3.0 Job Descriptions:

1. Along with the job title, provide the name of each employee filling every position related to hazardous waste management (§264.16(d)(1)).
2. Provide written job description (including the requisite skills, education level or other qualifications, and duties) for each position related to hazardous waste management (§264.16(d)(2)).
3. Provide a written description of the type and amount of initial and annual review training that will be given to each person filling a hazardous waste position (§264.16(d)(3)).

## Appendix II-F.6 Inspections

30. Appendix II-F.6 specifies that daily tank inspections are only Monday through Friday except designated holidays. Inspections are required each operating day per 40 CFR Part 264.195. EPA has clarified that each operating day has been defined as “every day the tank is in operation (i.e., storing or treating hazardous waste) and not necessarily just on days the facility is open for business [Source: *Introduction to Tanks*, EPA/530/K-05/018, September 2005,

<http://www.epa.gov/osw/inforesources/pubs/hotline/training/tanks05.pdf>] Where daily visual inspections are being used as a means of leak detection, the inspections must occur every day that the tank is in operation.

31. Section 3.0 states that “Safety and emergency equipment will be inspected on a weekly basis” and Section 4.0 states that “Safety and security devices will be inspected on a monthly basis.” The Part B should clearly differentiate between safety “equipment” and safety “devices”. There is a template inspection form for the monthly inspections but not the weekly inspections. What equipment is inspected weekly?

## 32. Appendix II-H Waste Analysis Plan (WAP):

1. (1.0/1): Please provide the difference in accepted waste codes between the permitted facility and the transfer facility.
2. (1.0/4): The Department recommends the following change in text-“...provided no underlying hazardous constituents...”
3. (1.0/4): 40 CFR Part 268 Appendix I is reserved (no information). Provide the intended reference.
4. (1.0/5): Clarify the sentence: “All hazardous waste managed at CHF is managed in areas designated for ignitable hazardous waste.” Was *designed* rather than *designated* intended?
5. (2.0/1): The waste generator must include all documents to support MPS determination including analytical results and MSDS.
6. (3.2/2): Clean Harbors is ultimately responsible for the accuracy of every waste profile, including permitted and transfer wastes. Further, under 49 CFR 171.1, CH is performing pre-transportation functions for their customers and is jointly responsible for ensuring compliance with materials classification, labeling, marking, packaging and preparation

of shipping papers on behalf of their customers. Clean Harbors is liable for waste profiles and shipping papers supplied to the generator unless the generator's representative certifies under penalty of law that he has received training in USEPA hazardous waste regulations and USDOT hazardous materials regulations within the last three years and that he is fully aware that providing false information on a waste profile may subject him to civil and criminal penalties pursuant to federal and state law.

7. (3.2/3): The number of checks for lab pack verification is unacceptable. If Clean Harbors labpicks the drum, then 10% of the CH-packed drums must be inspected. For non-CH lab packs, 100% of the drums must be inspected.
8. (3.2/4 and 5.3.1/1): Provide a more specific explanation of what is meant by "small cans."
9. (4.1/3): This paragraph should specify who will do the screening i.e. transporter or CHF, the type of test kit, and procedures to be followed if the generator can't rebut the presumption.
10. (5.3.1) If only 10% of the containers are sampled, why are those samples then composited?
11. (5.3.2/1): What is meant by a larger container?
12. Figure 2.1, Page 15, Paragraph F: Regulatory Status of CH Profile Sheet should include "Is this an Used Oil as defined by 40 CFR 279?"

## **Part II.B Containers**

33. Page 1, end of page; NOTE, what is the typical height of an 85 gallon drum?
34. Page 3, paragraph 3 states that "...spilled or leaked waste and accumulated precipitation will be removed within 24 hours of discovery...". If there is a hazardous waste spill or leak, it must be cleaned up immediately.
35. Page 4, first paragraph, please describe the outside access drain. Is the containment for this drain sufficiently high to match the elevations being drained inside the building?
36. Page 5, last paragraph, discusses the rolloffs. It would be appropriate to reference their location as illustrated in Figure 18.5.3. Also, Figure 18.5.3 identifies the "Designated Roll-off Areas". These designated areas are not consistent with the "Rolloff Storage" locations on Chapter 1, Appendix A.
37. The application must state that hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material per 264.177(b) (Part II.B.2 of the application).

38. Include a description of the procedures used to comply with 264.172 (Compatibility of waste with containers), and 264.173 (Management of Containers) as required by Part II.B.4 of the application:

1. The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired (264.172).
2. A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak (264.173(b)).

### **Part II.J Tank System**

39. Page 1, Venting Requirements: Specify the units used for the Wetted Area. Do these requirements apply to all tanks with flammable liquids? On the second page the relief-pressure setting on the manhole is given as 0.5 oz/in<sup>2</sup>. Are these the units you intend to use and if so confirm that this value corresponds to 0.03125 lbs/in<sup>2</sup> and 0.2155 kPa.

40. Page 3, paragraph 2: The text states that the crude storage tanks are 6,600 gallons but Figures 12.1(a) and (b) indicate maximum capacities of 6,000 gallons. If the figure is updated, "Storage" is misspelled on the Title of the Figure 12.1(a).

41. Page 5, paragraph one discusses the use of a Satellite Accumulation Area (SAA) for storage of wastes from the pans or pails. Submit the information for SWMUs for this SAA required under parts II.P and II.Q of the application (See comment 61.5).

42. Page 9, paragraph 1: If there is a release of a hazardous waste, we recommend that the spill be cleaned up immediately.

43. Page 9, paragraph 3 (discussion of reportable releases). If a spill becomes a Solid Waste Management Unit (SWMU), the timeframe (15 days) and requirements for reporting are located in your permit under Part V - General Corrective (Remedial) Action Conditions, Specific Condition 2.

44. Figure 12.1b, Title states: "Crude Storage Tanks T-106 to T-110..." Tank T-106 has been removed.

45. Are secondary containment areas sealed? If so, a description of the sealant (MSDS or other similar information) should be submitted.

46. The Part B is silent on inspection for cracks in the secondary containment, and subsequent corrective actions.

47. Piping associated with the tanks is not identified on figures although there is some mention of pipes in other documentation (e.g., RFA). "Piping" is mentioned in 2.1 and 2.2. The photos show overhead piping.

48. Page 14 of 16 is blank. Is this intentional?

49. Page 15 of 16, have there been any changes to the current physical and structural condition of the process area and/or equipment? If these changes affect the original engineering certification status, then they need to be documented.

## **Part II.K Closure**

50. Your closure plan lacks some of the details that would normally be included if you were preparing to close at this time (final closure). However, for this operating permit, a few specific requirements/clarifications are identified below. If and when you intend to close (final closure), we recommend that you notify the Department as soon as practicable (Your plan requires notification at least 180 days before closure). At that time, we can mutually work out any remaining closure details based upon site-specific circumstances, and current regulations and guidance as you review the closure plan. Requirements for postclosure care (if needed) can be discussed at that time.

51. For clarification, the term "Partial Closure" refers to the closure of a hazardous waste unit before final closure (see definition under 40 CFR Part 264.10). Maintenance or repairs would not meet the definition of partial closure.

52. If site assessment, interim measures or corrective action is required, these actions must be done in accordance with Chapter 62-780, F.A.C. and permit requirements.

53. Here and elsewhere, if contaminants in the rinseate, concrete or debris are known to be from a listed hazardous waste, then TCLP would not need to be performed for the purposes of a hazardous waste determination, i.e., the waste would be hazardous by the mixture rule. However, TCLP or other analyses may be desired by the recipient of the waste.

54. Section 9.1: It would be appropriate to also reference the closure requirements of 40 CFR Part 264.178 (Closure requirements for containers) and 264.111 (Closure performance standard).

55. Section 9.5, item 13: This section (and elsewhere throughout the closure plan) should be updated as ComQAPs are no longer required for laboratories although they must be NELAC certified. The Quality Assurance Chapter 62-160 should be used to address quality assurance activities.

56. Section 9.5, item 14 and elsewhere: There may be more appropriate criteria than groundwater cleanup target levels for comparing decontamination levels but those levels can be determined at a later date.

57. Section 9.5, item 23 and elsewhere: The specific Soil Cleanup Target Levels (SCTLs) used for comparison purposes are not specified. Briefly, if concentrations are above the leachability-based SCTLs, then you may be required to install groundwater monitoring wells to determine if soils have leached. Also, if Commercial/Industrial SCTLs are selected, Institutional Controls will also be required, and clean closure will not be an option. Also, the Department is currently evaluating alternate sampling protocols that might be available for your use at the time of closure.

58. Section 9.8: It would be appropriate to include a map identifying the Perimeter Road and limits of the staging (9.8.1) and non-staging (9.8.2) areas.

59. Section 9.8.1, item 18: The Perimeter Road is not a regulated unit subject to postclosure. It would be subject to other cleanup authorities such as the HSWA corrective action process and/or Chapter 62-780, F.A.C.

#### **Attachment 1 Closure Plan for PCB Area**

60. The State of Florida is not authorized for the PCB program, so final approval of this plan, its implementation and subsequent reporting requirements will need to be done with EPA Region 4. Environmental remediation will need to meet state cleanup criteria. A few missing items and inconsistencies are noted:

1. Section 8.1.3, paragraph 1: The specific location of the PCB Storage Area (Cell O) should be included in the PCB Closure Plan. The secondary containment calculations, page 7, estimate a 1,565.9 gallon containment which is greater than the 1,468 gallon containment in this paragraph.
2. Section 8.1.3, paragraph 3 cites a Figure 8.4 which is not included in the application. Also, Section 6.2.3 seems to be missing.
3. Section 8.3.3, paragraph 2 cites Attachment 8-2 which is not included.
4. Section 8.4, paragraph 1 cites Figure 8.4 that is not included.

#### **Part II.P Information Requirements Regarding Potential Releases from Solid Waste Management Units**

61. Certain Solid Waste Management Units (SWMUs) discussed in the Part B are not identified in Parts P & Q. A map showing the location of all SWMUs is required. In addition, SWMUs not listed in your Part B include (some were discussed on June 8, 2011):

1. Two 5,800-gallon used oil tanks (AST 700 and AST 701) or are these the same tanks as the "Petroleum Wastewater Tanks" (SWMU 14)?

2. Consolidation of gases described in Section I-C-1.1.1. Also discussed in WAP, page 4.
3. Pharmaceutical Storage Area? Photograph #9. Also discussed in WAP, page 4 and Section B (Containers...), page 6, last paragraph.
4. Electronic waste-WAP, page 4, last paragraph in Section 3.4.
5. Satellite Accumulation Areas (See comment 41 above).
6. Scrap Metal area or building identified on Chapter 1, Appendix A.
7. Transfer facility (Chapter 3 of Part B)

You should carefully determine if there are other SWMUs at your facility. Common examples include, fluorescent bulb crushers, used oil management areas, septic tanks and drainfields, etc. Part II.P and Q information requirements for each new SWMU must be submitted. A spreadsheet is acceptable for "generator" SWMUs (e.g. Satellite Accumulation Areas (SAAs), <90-day storage units). The Department will provide a spreadsheet in Excel format to complete, upon request.

62. P.1: The "Yes" box should be checked (at a minimum) for surface impoundments (stormwater ponds), storage tanks (surge tank for stormwater, Freon wash water storage tank, etc.), container storage area (SAAs), waste recycling operations and probably "other".

#### **Part II.Q Information Requirements for Solid Waste Management Units**

63. The most recent RFA is the "Revised RCRA Facility Assessment" dated August 21, 1991. The referenced July 1991 RFA was draft.

#### **Part II.S Requirements for Equipment**

64. Page 3 of 9: There are several leak detection methods mentioned in the text, please specify which method is currently being utilized. The Department will need to be notified if this method changes in the future.

65. Pages 4 and 5 of 9: Does the facility have any un-safe or difficult-to-monitor valves?

66. Page 7 of 9: Does the facility have any control devices other than those listed?

67. Figure 14.2: Is this list comprehensive or are these just a few example pages? Areas E and F are on this list but not on Figure 14.1, and Area D is on Figure 14.1 but not on the list.

#### **Section V AIR EMISSION STANDARDS (SUBPART CC)**

68. Page 1 of 4: Reference is made to 40 CFR 264.1082(2), but this reference does not exist, please clarify the reference.

#### **Chapter Three Transfer Facility**

Mr. John Bosek

August 5, 2011

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69. The Transfer Facility (TF) meets the definition of a SWMU so Parts P and Q of the application need to be completed for the TF as noted in earlier comments.

70. The location of the transfer facility within the permitted facility must be specified to provide assurance that the setback requirements of 40 CFR 264.176 are being maintained and that incompatible wastes are not being stored in proximity to each other.