

Thursby, Kim

From: Wyluda, John H. [jwyluda@triumvirate.com]
Sent: Monday, June 03, 2013 8:13 AM
To: Epost HWRS; McQuillan, John
Cc: Bahr, Tim; Goddard, Charles; Green, James F.; Kraemer, Janine; vsanagustin@feccorporation.com; Russell, Merlin; Tripp, Anthony; Kothur, Bheem; White, John
Subject: RE: Triumvireate Environmental (Florida); FLD080559728; First Request for Additional Information

Verifying receipt.

From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Friday, May 31, 2013 4:57 PM
To: McQuillan, John
Cc: Bahr, Tim; Goddard, Charles; Green, James F.; Kraemer, Janine; vsanagustin@feccorporation.com; Wyluda, John H.; Russell, Merlin; Tripp, Anthony; Kothur, Bheem; White, John
Subject: Triumvireate Environmental (Florida); FLD080559728; First Request for Additional Information

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.

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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

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

May 31, 2013

Sent Via E-mail

jmcquillan@triumvirate.com

Mr. John F. McQuillan
President/CEO
Triumvirate Environmental (Florida) Inc.
10100 Rocket Boulevard
Orlando, Florida 32824

**Subject: Triumvirate Environmental, FLD 980 559 728, Permit Number 26916-HO-008
Orange County
First Request for Additional Information**

Dear Mr. McQuillan:

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.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. 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

Sincerely,

Merlin D. Russell Jr.
Professional Geologist II
RCRA Program & Permitting

MR/mdr
Enclosure

Mr. John F. McQuillan

May 31, 2013

Page 2 of 30

cc via e-mail w/ enclosure:

James F. Green, Triumvirate, jgreen@triumvirate.com

Janine Kraemer, DEP/Orlando, Janine.kraemer@dep.state.fl.us

Victoriano L. San Agustin, Jr., vsanagustin@feccorporation.com

John Wyluda, Triumvirate, jwyluda@triumvirate.com

Enclosure
Triumvirate Environmental, FLD 980 559 728
Permit Number 26916-HO-007
Triumvirate Part B renewal (May 9, 2013 version) received May 13, 2013

General Comments:

1. All revisions to the Part B in one location must be made throughout the entire Part B
2. The Part B is inconsistent with the use of your name, Triumvirate Environmental, Inc (TEI) or Triumvirate Environmental Florida, Inc (TEIF). Use consistent nomenclature.
3. The Part B is inconsistent throughout the permit with using the proper citations, 40 CFR XXX.XX or Chapter 62-730 F.A.C. To assist you, this is what a piece of a rule is called:

Chapter	62-520, F.A.C.
Rule	62-520.300, F.A.C.
subsection	62-520.300(1), F.A.C.
paragraph	62-520.300(1)(a), F.A.C.
subparagraph	62-520.300(1)(a)1., F.A.C.
4. There are numerous typographic and editing errors throughout the Part B. We have noted some of these errors in the following comments, primarily where words were misspelled or missing. We suggest running spell check on your final draft, and carefully editing the document before finalizing.
5. It appears that different sections of the Part B were authored by different people. This is not uncommon. However, at the end, each section should be consistent with one another. As an example, there are numerous discussions on consolidation, and each is somewhat different. It would be best if a thorough and complete explanation of the consolidation process was located in one section, and other parts of the Part B could either copy that text exactly or simply refer to the section. This would eliminate inconsistencies. Similarly, with the figures, a single, correct base map should be developed that could be used for various figures.
6. According to the Department's solid waste (SW) permitting program, if Triumvirate intends on solidifying solid waste other than wastewater, antifreeze, latex paint and resin, you will need to submit a permit modification to the SW section because your SW permit only allows the aforementioned solidification.
7. Unless otherwise noted, this Notice of Deficiencies is based upon review of your hard copy because your electronic copies do not appear to match the hard copy.

Although the electronic copies were not reviewed, in the process of reviewing your Part B and spot checking the electronic copies, the following inconsistencies are noted:

1. There are two electronic files that contain Part II.P (files II.P.DEP.pdf and 730_2c.pdf). These files are different from one another. In addition, both are different than the hard copy of Part II.P.
2. Two certification sections were submitted with the electronic copy. One copy has no signatures. Neither contains the signed engineer's certification. The hard copy contains one unsigned engineer certification page, and a signed engineer certification page inserted into the front pocket.
3. The hard copy must contain original (wet) signatures for the Facility Operator, Facility Owner, and Land Owner along with the Professional Engineer certification.

8. The electronic copy of your revised Part B must be submitted as a complete copy of your hard copy, in a single .pdf file.

Specific Comments:

Part I

Section A. General Information

9. A.1: The "Miscellaneous Unit" box should not be checked. Your proposed treatment is in containers rather than a Miscellaneous Unit. A miscellaneous unit is subject to 40 CFR Part 264 Subpart X requirements.

10. A.10: James Green is listed as the Operator's name but John McQuillan signed the certification pages as the Facility Operator. These two sections must have the same person.

11. A.15: McQuillan is misspelled.

12. A.16: It should be Rockett_ (two t's) Boulevard Properties LLC according to the Orange County Property Appraiser (<http://www.ocpafl.org/Searches/ParcelSearch.aspx>). The mailing address for Rockett Boulevard Properties LLC should be 200 Inner Belt Rd, Somerville, MA 02143.

13. A. 17: Complete the information for the engineer of record.

14. A.19:

1. Triumvirate did not identify themselves as Used Oil Processors in their last Used Oil Handler registration.
2. A pending or issued permit from the Orange County Health Department identified on page 2AWP-19, Section 10.0, item c is not identified on this table.

Section B. Site Information

15. B.1: The degree symbol (°) is not included in the lat/long.
16. B.3: The September 25, 2009 FIRM map is illegible and the text is cut off on both sides. Submit a full-sized color copy of this map. The December 6, 2000 FIRM map is impossible to read in the black areas. Resubmit a full-sized color map.
17. B.4, Page I-10: The USGS map is a 7.5-minute quadrangle.

Section D. Operating Information:

18. Page I-10, item 3. Photo I.B.3.-18 is not included in the Part B.
19. Page I-13 paragraph 2, fourth sentence should read: "The profile is reviewed by knowledgeable person(s) which assign the process code at Triumvirate Environmental."
20. Page I-14, paragraph 1 states: "Failure of waste to pass a compatibility test is evidence that the waste in questions does not conform to the specifications stated in the profile." Although that is one explanation, failure of a compatibility test could also be due to other reasons, such as testing errors by an individual (inadvertently mixing incompatible materials).
21. Page I-16, third paragraph states: "Consolidation codes replace the hazard class as the communication media used to identify the storage cell." The permitted storage area is segregated by hazard class but apparently the consolidated waste is not going to use this method. Please explain why.
22. Page I-17, Stabilization (Solidification and Stabilization):
1. First sentence "1) solidification of wastes containing free liquids by adding absorbent..." Is Triumvirate referring to hazardous waste, non-hazardous waste or both?
 2. Reference to "D012" on line 4 of the first paragraph should read "D011".
 3. Reference to "40 CFR 270.1(c)(2)(vii)" on line 4 of the first paragraph should be removed as it applies to addition of absorbent to a container *provided* it occurs at the time waste is first placed in the container.
 4. The word "ash" should be added between "fly" and "will" on line five of the first paragraph.
 5. Reference to solidification of "...non-hazardous liquids and sludges also requires thorough mixing.": According to the SW permit, Triumvirate has only been authorized to solidify wastewater, antifreeze, latex paint and resin.

6. Paragraph 2, sentence four should read: "Reagents may include fly ash or cement."

23. Page I-18, paragraph 2, Storage of non-hazardous waste: This would be the appropriate section to briefly discuss the other, non-hazardous waste that is managed at Triumvirate such as used oil, used antifreeze, solid waste stabilization, etc.

24. Page I-19, Part I.D.3:

1. The Process Design Capacity and Units of Measure entries were not included within the Table as required by Part I.D.3. Table 1.D.3 should be labeled.
2. Some of the P and U listed wastes contain the characteristic code C, I, R and/or T. Some do not. You may wish to add those codes that are not included in your list for consistency.
3. We found the following errors in Table 1.D.3:
 - a. "0-Cresol" should be "o-Cresol" (D023)
 - b. Spent Cyanide Plating ~~Solvents~~ Solutions (F007)
 - c. Creosote Residuals (F034)
 - d. ~~Stop Slop~~ Oil... (K049)
 - e. The K160 listing was removed in 1997 (FR Vol. 62, No. 116, June 17, 1997).
 - f. Warfarin and Salts when >0.03% (P001)
 - g. Allyl Alcohol should be Allyl Alcohol (P005)
 - h. Aminopyridine should be 4-aminopyridine (P008)
 - i. H₃AsO₄ should be H₃AsO₄ (P010)
 - j. As₂O₅ should be As₂O₅ (P011)
 - k. As₂O₃ should be As₂O₃ (P012)
 - l. Arsine, Diethyl (P038)
 - m. 0,0-Diethyl... should be O,O-Diethyl... (P040)
 - n. Aldicarb should be aldicarb (P070)
 - o. P114 is listed as Selenious Acid, thallium (1+) salt (CAS 12039-52-0) and not as Thallium (1) Selenide (CAS 15572-25-5).
 - p. P115 is listed as Plumbane, tetraethyl (CAS 7446-18-6) and not as thallium sulfate (CAS 10031-59-1).
 - q. P190 should be Metolcarb.
 - r. U032 should be calcium chromate.
 - s. U047 should be beta-chloronaphthalene
 - t. U073 should be 3,3'-dichlorobenzidine
 - u. U087 should be O,O-Diethyl...
 - v. U158 should be ...(2-chloroaniline)
 - w. U171 should be 2-Nitropropane
 - x. U202, saccharin and salts. In December, 2010, EPA amended RCRA regulations to remove saccharin and its salts from the lists of hazardous constituents and commercial chemical products which are hazardous wastes when discarded.

- y. U248 should include "...when present at concentrations of 0.3% or less"
- z. U277 Sulfallate is no longer listed
- aa. U365 Molinate is no longer listed
- bb. U366 Dazomet is no longer listed
- cc. U375-U386 are no longer listed
- dd. U390-U393 are no longer listed
- ee. U396-U403 are no longer listed
- ff. U407 Ethyl Ziram is no longer listed

Figures and Photographs

25. Figure I B 1 Facility Layout

1. There are two different Figure I B 1. The smaller copy is on page 2ACP. The other is a foldout under the Maps/Figures Tab. Both maps should be identical.
2. Neither figure has a scale as required by the application instructions.
3. The smaller map has the Used Oil Tank labeled as the Waste Consolidation Area.
4. The smaller map should identify the north building as the Waste Consolidation and Stabilization Area, as on the large map.
5. Identify the room in the southeast corner of the Container Storage Unit.
6. The figure does not identify the proposed stabilization area to the west of the "Waste Consolidation and Stabilization Area".
7. The "Oil Tank" should be labeled "Used Oil Tank".
8. According to page 2A-1 (Part II A 1 a (4)), the chain link fence lies on the property boundary. The shape of the property is different than what is illustrated on other figures [Note that the length of the eastern property (642.92') is inconsistent with Figures II A 2 and A 4 but this may be due to changes in property.].
9. The outdoor consolidation area discussed in on page ACP-9, Section 5.2 is not identified on this figure.

26. Figure I.B.2 Facility Traffic Patterns

1. The figure does not identify the proposed stabilization area to the west of the "Waste Consolidation and Stabilization Area".
2. There is no scale as required by the application instructions.
3. The figure does not indicate the path taken by trucks accessing the east side of the facility.


27. First FIRM map

1. Should this be identified as Figure I.B.3?
2. The September 25, 2009 FIRM map is illegible.
3. The text is cut off on both sides. Submit a full-sized color copy of this map.

28. Figure I.B.4 (FIRM map)

1. The December 6, 2000 FIRM map is impossible to read in the black areas. Resubmit a full-sized color map.
2. Identify the location of Triumvirate on the map.
3. There is no legend on the map (Figure I B 4).
4. There is no legible Zone AE (discussed in the text) on the map (Figure I B 4).

29. Figure I.B.5

1. The figure does not have a north arrow as required by the application instructions.
2. On the legend, the icon for the "Streets" is missing.
3. If the  are not being used, then they should be eliminated from the legend.

30. Photo I.B.3-18 Revision 0

1. Because this figure is not labeled (no title or legend), it is unclear what information this figure is intended to illustrate for the purposes of the application.
2. The figure does not have a north arrow as required by the application instructions.
3. There is no scale as required by the application instructions.

31. Photos I.B.3-1 through I.B-3 were not included in the Part B.

32. Photos I.B.3-4 through 3-9, and 3-13 through 3.15 are of poor to fair quality. If original photographs are still available, then better quality copies need to be made. It would be appropriate to add the date of the photographs and photographer (if available) to all photographs. These photos need to be updated to reflect the current state of the facility and the surroundings.

33. Figure II A 2

1. Many of the elevations are illegible. Submit a legible copy. Submit an updated copy.
2. In comparing Figure II A 2 (Boundary and Topographic Survey) and Figure II A 4 (Topographic Survey) clarification is needed. Figure II A 4 shows a property length of 312.88' (the survey is dated March 11, 1994. Figure II A 2 shows a property length of 842.92' (the survey is dated July 5, 1995. Is this simply a matter of additional property being purchased sometime between the surveys?

34. Figure II A 4 illustrates an L-shaped retention pond in the northeast corner of the property. Figure II A 5 shows a rectangular stormwater retention basin in the north center portion of the property. It is unclear if the 2008 figure (II A 5) illustrates a reconfiguration of the earlier pond or if the new stormwater retention basin was constructed in a different location (Figure II A 5 is not to scale, therefore difficult to determine the location of the stormwater retention basin). The appropriate place to discuss the retention basins is in Parts II.P and II.Q under the solid waste management unit information. This figure needs to be updated to include the current facility boundaries.

35. Figure II A 6

1. Because this figure is not labeled (no title or legend), it is unclear what information this figure is intended to illustrate for the purposes of the application.
2. The figure does not have a north arrow as required by the application instructions.
3. There is no scale as required by the application instructions.
4. Some of the streets are illegible. A legible copy of this figure must be submitted.
5. There is no longer a Bee-line Expressway; it is now Beach-Line.

36. Figure II A 7

1. The figure does not have a north arrow as required by the application instructions.
2. There is no scale as required by the application instructions.
3. Some of the streets are illegible. A clearer copy of this figure must be submitted.
4. The legend needs to be fixed. Some of the icons were not provided in the copy.
5. Figure II A 7 identifies a "Hazardous Materials Response Team #50" but page 2ACP-6, paragraph 1 discusses the "Orange County Fire Rescue Station 350". Nomenclature needs to be consistent for clarity.
6. There is no longer a Bee-line Expressway; it is now Beach-Line.

37. Figure II A 8

1. There are two different Figure II A 8s. Both should be identical. The smaller figure is on page 2ACP-22, and the larger is in the Maps/Figures Tab.
2. The smaller map has the Used Oil Tank labeled as the Waste Consolidation Area.
3. Both maps should identify the north building as the Waste Consolidation and Stabilization Area.
4. Neither figure has a north arrow as required by the application instructions.
5. There is no scale as required by the application instructions.
6. Neither figure should contain breaks in scale or continuity.

38. Figure II A 9

1. The figure does not have a north arrow as required by the application instructions.
2. There is no scale as required by the application instructions.
3. A backup (secondary) Rally Point must be identified in the event that egress to the primary Rally Point is obstructed.

39. Figure 1 D 1, Facility Storage Layout

1. This is one of two Figure 1 D 1s. The other is located in Part II.Q Facility Storage Layout of SWMU's.
2. The figure does not have a north arrow as required by the application instructions.
3. There is no scale as required by the application instructions.
4. The subunits discussed on page 2APP-1, paragraph 4, are not illustrated on the figure.

5. The stabilization area discussed on Page 2APP-3, paragraph 4 must be identified on this figure.
6. The outside consolidation area discussed on Page 2ACP-9, section 5.2 must be identified on this figure.
7. Each area (e.g., container storage unit, both waste consolidation areas, stabilization area) should clearly be delineated (e.g., using a heavy line) on this figure (The container storage unit can be interpreted to include the office).
8. Ensure that the nomenclature for the "Waste Consolidation Area" is consistent in figures and throughout the text. As noted previously, this area should be identified as the Consolidation and Stabilization Area. Throughout the Part B, this area is also referred to as the north building. The photographs refer to this building as the "North Building Waste Stabilization/Consolidation Area."

Certification Pages:

40. The P.G. certification is not needed as the application contains no interpretive geology.

Part II.A General

41. Part II A 1.a, page 2A-1, second paragraph and later under "(2)": Figure II A 1 is not included in the application.

42. Part II A 1.a(5) and (7), top of page 2A-2 and Page 2ACP-14, last sentence of item d: The stormwater pond is a retention pond, not a prevention pond.

43. Part II A 1.a(7), page 2A-2: Because the hazardous waste permit application instructions (Page 7, item B.4.d of the application) requires the identification of surface water features within ¼ mile, ensure that the conveyances (culverts, ditches, streams, etc.) from the stormwater pond to Boggy Creek are clearly identified on a map or figure. Part II A 1.a(9) indicates that this is illustrated on Figure II A 1 but as noted earlier, this Figure is missing from the Part B.

44. Part II A 1.a(11), page 2A-2: The text should identify the map that indicates no residences, schools, churches or public gathering places within 1,000'.

45. Part II A.1.b: The wind rose diagram (Figure II A 3) is five years old and from the Tampa Airport. A more recent wind rose from the immediate area (i.e., Orlando) must be submitted.

Part II.A.2 Financial Responsibility Information

46. Part II A.2., page 2A-4: While there are several options for financial assurance mechanisms, only those that are applicable may be used.

Part II.A.3 Flood Map/Information

47. Page 2A-14, paragraph 5:

1. There is no legend or legible Zone AE (discussed in the text) on the map (Figure I B 4).
2. Exhibit II.A.3.-1 is missing from the Part B (Flood Zone Determination).

48. Page 2A-15: Exhibits II.A.3.-2, II.A.3-3 and II.A.3-5 are missing from the Part B so it was not possible to evaluate this page.

49. Page 2A-16, paragraph 5: Exhibit II.A.3.b.-1 is missing from the Part B.

50. Page 2A-20, paragraph 1: “equipment” is misspelled in the last sentence of the paragraph.

Part II.A.4.a Security Procedure

51. Page 2A-18: 40 CFR 264.14 is not accurately summarized. Option 3, which is 264.14(b)(2), does not involve signs. Option 3 should require a fence to completely surround the active portion of the facility and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility). The posting of signs on the fence does not satisfy this provision.

Part II.A.4.b Contingency Plan

52. The Department recommends an electronic copy of the CP be offered to first responders, and an annual review of the CP.

53. Once approved, ensure that the approval date is used on the title page.

54. An emergency contractor must be identified in the contingency plan.

55. Page 2ACP-4, paragraph 1: The purchase of the facility was in 2011, not October 2012.

56. Page 2ACP-6, paragraph 1: Nomenclature needs to be consistent for clarity. This paragraph discusses the “Orange County Fire Rescue Station 350” but Figure II A 7 identifies a “Hazardous Materials Response Team #50”.

57. Page 2ACP-8, paragraph 3: For clarification, EPA hazardous waste codes are also assigned based upon listings, not just characteristics.

58. Page 2ACP-8, paragraph 4: Material Safety Data Sheets are now called Safety Data Sheets as pointed out elsewhere in your application (2AWP-7, paragraph 3).

59. Page 2ACP-9, section 5.2: The outside consolidation area must be identified on this Figure 1 D 1.

60. Page 2ACP-9, Section 5.2:

1. The consolidation area is not identified on this Figure 1 D 1.
2. Whenever consolidation is discussed, the Part B must consistently state what you plan to consolidate. Different chemicals and/or terms are used in the various discussions on consolidation.

61. Page 2ACP-10, item 6: Remove “Hazardous Waste Section”.

62. Page 2ACP-10: item 10 is captured within item 9. A hard return needs to be added after “utilized”.

63. Page 2ACP-11: After item 14, suggestions should be deleted because the first and last suggestions are included in items 9 and 13. However, the CP must address the requirement to monitor pressure buildup, leaks and gas generation required by 40 CFR Part 264.56(f).

64. Page 2ACP-13, second paragraph: As mentioned previously (comment 60 above Page 2ACP-9, Section 5.2) the Part B must consistently state what you plan to consolidate.

65. Page 2ACP-16, Section 10: For your information, EPA maintains a website containing information on how to prepare for a hurricane. The webpage is entitled: *As Hurricane Season Begins: A Reminder to Minimize Process Shutdown Related Releases and to Report Releases In a Timely Manner*, and it can be located at http://www.epa.gov/region4/r4_hurricanereleases.html

66. Table II.A.4.b.-1:

1. The National Incident Management System (discussed on page 2ACP-17, last paragraph) must be added to this table.
2. The State Warning Point is a centralized phone bank managed by the Department of Community Affairs' Division of Emergency Management.
3. EPA's Region 4 website (<http://www.epa.gov/region4/home/contact.html>) identifies the phone number for 24-hour spill reporting as 1-800-424-8802 (same as the NRC).

67. Table II.A.4.b.-3. The table was reviewed through the P-listed waste, and comments are provided. *Ensure that the U-listed wastes are carefully checked.* The DOT Hazard Class was not reviewed.

1. D028, 1,2-dichloroethane should be CAS 107-06-02.
2. D043, vinyl chloride should be CAS 75-01-4 (CAS 110-86-1 is for azabenzene).
3. Spent Cyanide Plating ~~Solvents~~ Solutions (F007).
4. ~~Stop Slop~~ Oil... (K049).
5. The K160 listing was removed in 1997 (FR Vol. 62, No. 116, June 17, 1997).
6. Warfarin and Salts when >0.03% (P001).
7. P040, should be "O,O-diethyl..."
8. P042 is listed as Epinephrine CAS 51-43-4. You have listed the CAS number (CAS 329-65-7) for its stereoisomer.
9. P108, strychnine should be CAS 157-24-9.
10. P114, Selenious acid, dithallium (1+) salt should be CAS 12039-52-0.
11. P115 is listed as Plumbane, tetraethyl (CAS 7446-18-6) and not as thallium sulfate (CAS 10031-59-1).
12. P118 is listed as Trichloromethanethiol (CHCl₃S), CAS 75-70-7.
Perchloromethylmercaptan (CCl₃SCI), also known as Perchloromethanethiol has a CAS 594-42-3.

68. Table II.A.4.b.-4:

1. It appears that all emergency equipment, including equipment contained within the Personnel Safety Equipment Cabinet is combined into a single list. This is acceptable, however this list does not include the following items identified elsewhere in the Part B:
 - a. Hand-held explosion meter discussed on page 2A-21, paragraph 8.
 - b. 5-lb. hand held fire extinguisher identified on 2APP-5.
 - c. 10-lb. hand held fire extinguisher identified on 2APP-5.
 - d. 150-lb. wheel-mounted fire extinguisher identified on 2APP-5.
 - e. Automatic sprinkler system.
 - f. Spill control equipment (granular absorbent material (oil dry), shovels, brooms and dust pans) identified on 2APP-5.
 - g. Air-driven pumps of various sizes used for spills identified on 2APP-5.
 - h. Alarms.
 - i. Stretcher identified on Figure II A 8.
2. Typographic errors:
 - a. In the Tyvek description, contaminates should be contaminants.
 - b. In the Rubber gloves, " ..to protect hands."

69. Exhibit II.B.1.2: The location of the Hazmat Storage Locker should appear in the various figures for the facility.

Part II.A.4.c Procedures, Structures or Equipment

70. Page 2A-19, paragraph 4: The last sentence references consolidating solid hazardous waste into bulk containers just outside the west wall of the north building.

Consolidation of hazardous waste outside the building would be acceptable under certain conditions:

1. Consolidation of HW is acceptable in tanks or containers.
2. Consolidation must be on an impervious surface. The surface must be sealed.
3. Consolidation must not occur during rain events. It would be best if this area were covered.
4. Tanks and containers must be closed except when loading/unloading/mixing.
5. Tanks and containers used for consolidation must be in good condition so that there are no releases.
6. Limiting the consolidation to solids (physical state) unless bermed.

71. Page 2A-20, paragraph 1: The last line should be "...equipment..."

72. Page 2A-20, paragraph 4:

1. Regarding the "consolidation of inhalation hazard waste", at no time during the pre-application meeting did Triumvirate mention consolidating inhalation hazards. If Triumvirate is going to consolidate inhalation hazards the Part B needs to include some air monitoring equipment.
2. This paragraph should be expanded to discuss the length of use and frequency of cartridge change-out.

73. Page 2A-21, paragraph 5: If inhalation hazards exist (See comment 72 above), leaving the doors open during consolidation should require the need for air emission equipment?

74. Page 2A-22, item 5: This paragraph discusses containment of hazardous runoff into the stormwater pond as a backup to secondary containment failure for the storage unit. The pond might be the primary containment unit in the event of a release from wastes outside the containment area, as might occur with a release from trucks. First, there is no figure or text to support that a major release will flow to the pond from anywhere on site. Such documentation is needed if the pond is going to be considered a backup. Also, describe the type of controls, if any, for containing a release in the stormwater pond. Part II A 1.a(9) indicates that the stormwater pond is connected to Boggy Creek.

Also, the second paragraph states that according to the 2009 FEMA floodplain map, Triumvirate is not located in a 100-year floodplain area. Earlier in your application (Page 2A-14, paragraph 5) the text states:

"...the TEI site is located in a 100-year floodplain designated as Zone AE, per the 2000 map."

75. Page 2A-22, paragraph 5: If Triumvirate intends to consolidate inhalation hazards, then the statement in the first paragraph may be incorrect depending upon the magnitude of the air release.

76. Page 2A-23, first paragraph: Earlier, the Part B discusses consolidation being conducted with the doors open. This is inconsistent with:

“Gases from accidental releases occurring at these operational areas will be confined to the space where the operation is conducted.”

Correct this discrepancy.

Part II.A.4.d Preparedness and Prevention Plan

77. The following information is missing from the PPP:

1. The types of wastes for the container storage unit are not included in the narrative or in Figure 1 D 1 as recommended by EPA guidance¹. It would still be appropriate to update the text and modify your figure to indicate the type(s) of waste(s) in the container storage unit. As an example, corrosives should be identified. Specific types of corrosives (e.g., type of acid) need not be identified in this section. The type of hazard would be sufficient (e.g., corrosive, flammable, toxic, etc.). Also include the types of solid waste managed in the unit should be noted on the figure (used antifreeze, fluorescent bulbs, etc.).
2. Decontamination equipment is not included in the PPP (40 CFR 264.32(c)).
3. Where state or local authorities decline to enter into arrangements for emergency assistance, you must document the refusal in the operating record (40 CFR Part 264.37(b)).

78. The Department recommends an electronic copy be offered to first responders, a copy be located near the facility (in the event the PPP cannot be accessed due to an incident) and an annual review.

79. Page 2APP-1, paragraph 4: The subunits are not labeled as such on Figure 1 D 1.

80. Page 2APP-1, paragraph 4: This paragraph should reference where the secondary containment calculations are located in the application that supports the penultimate sentence.

81. Page 2APP-3: We suggest, that for clarity, the discussions on consolidation be separated from discussions on stabilization. As an example, it is not entirely clear whether you are referring to stabilization or consolidation of the flammables. As

¹ *1 Preparedness and Prevention Requirements for RCRA TSDFs (Response to Chemical Safety Board Recommendation 2007-01-I-NC) dated March 5, 2010

discussed earlier, the Part B must be consistent about the types of wastes Triumvirate is proposing to consolidate. This paragraph mentions non-regulated materials (which they may require a modification to the SW permit), alkalines and toxics. Another section of the Part B discusses inhalation hazards.

82. Page 2APP: The stabilization location must be labeled on Figure 1 D 1.

83. Page 2APP-3, paragraph 3: Consolidation of solid wastes is regulated by the department's solid waste section. Solid waste consolidation activities in this Part B should reference the specific solid waste permit. Also, the metals should be D004-D008 and D010-D011.

84. Page 2APP-3, paragraph 4: Referencing the use of "tote tanks", they are "totes". Totes meet the definition of containers.

85. Page 2APP-4, paragraph 1, last sentence: Be specific about the type of management you propose for the corrosive and other non-combustible liquids.

86. Page 2APP-4, paragraph 2: The secondary containment volume should reference the calculation located elsewhere in the Part B.

87. Page 2APP-5, paragraph 5: Section II.C.11 is missing. It is not even listed in the Table of Contents.

88. Page 2APP-7, paragraph 1: Table II.A.4.b.-1 was not included in the Part B.

Part II.A.4.e Training

89. Page 2ATP-6, Under the Environmental Personnel, Safety Measures and Protective Equipment, Regulations, 29 CFR Part 1910.120: Exhibit II.A.4.e.-1 is missing. In the next section Exhibit II.A.4.e.-3 is also missing.

90. For the Position Title "Driver/Facility, Orlando Facility" we recommend the following thoughts be captured as additional duties:

1. If there is a release during loading/unloading, the driver should respond to the release. This may range from a simple cleanup to yelling and clearing the area if a large release occurs.
2. The driver should provide a first response if involved in a traffic accident. Again, there are a wide range of responses depending upon the type of accident but the driver should be able to initiate an appropriate response regarding health and safety, and waste management issues.

91. As discussed earlier, if consolidation is going to be performed, a chemist must be on site, and a description of the chemists training must be included.

Part II.A.5 Chemical & Physical Analyses

92. Page 2A-25, item 5 should read 40 CFR 264.13 and 40 CFR 270.14(b)(2).
93. Page 2A-25, item 6 should read 40 CFR 264.13(b) and 40 CFR 270.14(b)(3).
94. Page 2A-25: We concur that it would be unnecessary to submit all of your analytical reports with this renewal. As we have done with other similar TSDFs, submit a few examples of actual reports for your most common wastes you managed.

Part II.A.6 Waste Analysis Plan

95. Page 2AWP-1 is the same page as 2A-25. See previous comments regarding Page 2A-25.
96. Page 2AWP-4, paragraph 1 should reference 40 CFR 264.13(b) and (c).
97. Page 2AWP-5, paragraph 2, last sentence: It would be appropriate to add (at the end of the sentence) "...of this plan but information on the Transfer Facility is located in Part II.A Section 7.0"
98. Page 2AWP-4, paragraph 3, last sentence: For clarification, we suggest adding "... on Charts 2-9 of Table II.A.5/6.-1a." .
99. Page 2AWP-5, paragraph 4, item c: Please clarify the text "Set the frequency that analyses that should occur with hazardous waste."
100. Page 2AWP-6, item f: The text should read "Determine ~~its~~ the wastes' regulatory status."
101. Page 2AWP-6, paragraph 2 (first paragraph of section 5.0): The reference to Part 265 should be removed. Part 265 is for interim status facilities, and Triumvirate is a permitted facility. We also suggest the additional insertion:
- "...40 CFR Part 264 ~~or 265~~ and or disposed in accordance with the Land Disposal Restriction..."
102. Page 2AWP-11: The fourth sentence from the bottom needs to be clarified. Something is incorrect or missing.
103. Page 2AWP-12, paragraph 4, second bullet: A change needs to be made to the sentence: "That contaminants in the must be capable of being treated using the same process".

104. Page 2AWP-14, paragraph 3:

1. This section needs to be specific on the number of random checks to verify conformance. It appears that Triumvirate uses three levels of verification (in order of complexity): 1) visual identification of color and physical state, 2) on-site testing such as pH, specific gravity, flash point, etc. and 3) laboratory analysis. The WAP needs to be very specific about the frequency of the random checks for each step. We expect that a high percentage of incoming wastes are verified using level 1, a lower percentage using level 2 and the lowest percentage being verified through the offsite lab.
2. Documentation of the verification process must be included. It would be acceptable to document the verification on the waste profile sheet.

105. Page 2AWP-15, paragraph 1:

1. Last sentence: Exhibit II.A.5/6.-1 should be Attachment II.A.5/6.-1
2. The Part B needs to include a time limit for consolidating containers. Because the oldest date of a container should be entered onto the consolidation drum, Triumvirate must remove it within one year from the time the earliest (consolidation) container enters the facility. As an example, a drum is pulled from the container storage unit and consolidated in a tote. The tote gets the date of the oldest drum. The tote can be returned to the container storage unit but maintains the oldest date.

106. Page 2AWP-15, paragraph 3: This section on the analysis of treated waste is missing the following information:

1. Will every batch of treated waste be tested to ensure that the waste has been decharacterized? Will the sample be discrete or a composite? If composite, describe the procedures for obtaining the composite (e.g., sampling device, number of samples for compositing, sample locations (e.g., different locations, top, middle, sides of container, etc.)).
2. Will every batch of treated waste be tested to ensure that the waste meets LDRs? Keep in mind that testing LDRs for non-wastewaters must be made on grab samples (40 CFR Part 268.48(a)). Compositing is not allowed for non-wastewaters.
3. Describe the process for determining UHCs². If the generator is initially responsible, then detail your verification process.
4. Because you are proposing only metals for treatment, a table with the non-wastewater UTSeS for metals should be included with the Part B. Also, because you propose to treat metal-bearing soils, the alternate LDR Treatment Standards for soils (40 CFR Part 268.49) should be included. You might wish to also include the TCLP limit as the TCLP limit and UTS are not necessarily the same (e.g., lead).

² RCRA Online 14325 states that where no institutional knowledge exists concerning waste contaminants, analysis should be conducted for the entire 268.48 constituents.

5. A discussion of how the alternate LDR Treatment Standards in 268.49 apply to soils should be included here. Sampling procedures to meet the 90% reduction must be included.

107. Page 2AWP-16, paragraph 1: Rule 62-17-730.171, F.A.C. should be Rule 62-730.171, F.A.C.

108. Page 2AWP-16, paragraph 2: Identify wastestreams, other than metal-bearing wastestreams that will be candidates for solidification.

109. Page 2AWP-17, paragraph 4: Explain how the treated waste will be managed if it passes TCLP but does not meet LDRs?

110. Page 2AWP-19, Section 10.0:

1. Item b: Should Division 1.6 also be included?
2. Item c: Part I.A.19 of your application does not identify a pending or issued permit from the Orange County Health Department. Part I.A.19 does identify DOH as having issued a Biomedical Waste Storage Operating Permit. These discrepancies need to be resolved.

111. Page 2AWP-20, Section 11.0, Frequency of Analysis must include the frequency for analyzing (verifying) incoming wastes and the frequency of analyzing treated wastes.

112. Page 2AWP-21, paragraph 1: Analyses must be performed by a NELAC approved Laboratory. We suggest the following language be added:

“Such analyses may be performed at an off-site, NELAC-approved laboratory.”

113. Page 2AWP-21, paragraph 2: Regarding “...Observing the mixture for reaction signs.”, identify the signs that would be expected. There should be a pass/fail log, and if failed, the reason should be noted. Similar changes should be made on page 2AWP-65, paragraph 3.

114. Page 2AWP-22, Table II.A.5/6.-1: This Table appears to have the same errors (and additional) as Table II.A.4.b.-3 (See comment 67). Therefore, this table will not be reviewed until the errors previously mentioned are corrected. A few examples include:

1. Chromium, D007, should probably be listed as “Chromium (Haz. Substance)”.
2. D028, 1,2-dichloroethane should be CAS 107-06-02.
3. D043, vinyl chloride should be CAS 75-01-4 (CAS 110-86-1 is for azabenzene).
4. Spent Cyanide Plating ~~Solvents~~ Solutions (F007).
5. ~~Stop Slop~~ Oil... (K049).
6. The K160 listing was removed in 1997 (FR Vol. 62, No. 116, June 17, 1997).

115. Page 2AWP-32, Table II.A.5/6.-1a:

1. Page 2AWP-32, second paragraph omits an explanation of Chart 2a.
2. Chart 1-the nitroglycerin row has cut off the wrapped text.
3. Define "HZ B" used for chloropicrin on Chart 2 and hydrogen sulfide on Chart 2a.
4. Spelling of the chemicals should be carefully checked. A few incorrect spellings are identified:
 - a. Allyl Bromide should be Allyl Bromide on Chart 3
 - b. Bis(trimethylsilyl)methane should be Bis(trimethylsilyl)methane on Chart 3.
 - c. "Cx_anogerBromide" on Chart 6 is misspelled. Should this be Cyanogen bromide?

116. Page 2AWP-52, Table II.A.5/6-2: Footnote (1) reference an old (1980) EPA guidance document. DEP's current Standard Operating Procedures (SOPs) must be used. FS 5000 is on waste sampling. DEP SOPs (Chapter 62-160) can be located at: <http://www.dep.state.fl.us/water/sas/sop/sops.htm>

117. Page 2AWP-53, Table II.A.5/6-3: Under metals, "700B" should be "7000B".

118. Page 2AWP-54, Exhibit II.A.5/6.-1 Waste Material Profile Form:

1. You may want to add a section to this form for the generator to identify reasonably expected underlying Hazardous Constituents (UHCs) for characteristic wastes.

119. Page 2AWP-65, paragraph 2: Additional details of the consolidation are needed for the labpacks:

1. The volume of waste removed from each container for compatibility testing is unclear. Is the intent to keep the volumetric ratios of each container the same? As an example, if you were combining 10 one-gallon and one five-gallon containers, would you combine one cup of waste from each one-gallon container, and five cups from the five-gallon container?
2. For this first step, provide an estimate of the volumes of each waste used in the test. Also, provide a volumetric estimate of the test vessel (e.g., Are we talking test tube sized samples being consolidated into a gallon container on a table top or pints of wastes being consolidated into a drum on the floor?).
3. Although your intent is to combine the wastes within the shortest time as possible, do you not want to pour wastes into the consolidation container one at a time with some time to observe a reaction? It would seem that combining all the containers in the shortest period of time to achieve maximum reaction would make it difficult to identify the incompatible waste.
4. How long is the test (after consolidation) run?
5. What chemical changes are observed?
6. Is temperature taken and recorded?

120. Page 2AWP-65, paragraph 3:

1. For clarity, is the initial labpack mixture discussed in paragraph 2 mixed with an existing mixture (consolidation container) at a 1:2 ratio?
2. How long is the test (after consolidation) run?
3. For labpack consolidation, results of the consolidation tests will not be recorded. For the labpack shipping container, documentation will be kept to indicate whether the compatibility test was performed or not.
4. Is temperature taken and recorded?

121. Page 2AWP-65, paragraph 4: Similar questions are raised for the consolidation of bulk containers:

1. For clarification, how are bulk containers defined? Are 55-gallon drums included, as well as tanker trucks?
2. We suggest moving the last sentence (This Part of the compatibility test is labeled STEP A) to the first sentence, and using this same sentence in the paragraph for the labpack discussions.
3. The volume of waste removed from each container for compatibility testing is unclear. Is the intent to keep the volumetric ratios of each container the same? As an example, if each you were combining 10 one-gallon and one five-gallon containers, would you combine one cup of waste from each one-gallon container, and five cups from the five-gallon container?
4. For Step A, provide an estimate of the volumes of each waste used in the test. Also, provide a volumetric estimate of the test vessel.
5. How long is the test (after consolidation) run?
6. Figure 4-1 (reaction log) is not included in the Part B.

122. Page 2AWP-65, paragraph 5:

1. How long is the test (after consolidation) run?

123. Page 2AWP-66, paragraph 1: Exhibit II.A.5/6-1-1 is missing from the Part B.

124. Page 2AWP-66, paragraph 2: The last sentence indicates that some of the bulk consolidation wastes will be stored in storage tanks. If this is in error, it should be deleted. If storage does occur in tanks, additional information on the tanks must be submitted with the Part B. Because we have had no indication that storage of hazardous wastes in tanks is envisioned at Triumvirate, if they are <90-day storage tanks, they will need to be identified as a SWMU.

125. Page 2AWP-66, Respiratory: According to the text, respirators are not needed provided an exhaust fan is in use. Is this the case for every chemical proposed for consolidation any chemical?

126. Page 2AWP-66, Section 6.0:

1. The list of equipment is out of place.

2. The end of the last sentence appears to be in the next section (Section 7.0).

127. Page 2AWP-67, Section 7.0 Indication of Suspected Reactants: The only indication of suspected reactants listed in this section is generation of gas or bubbling mixture. It would be appropriate to include other signs of reactions such as an increase in temperature, creation of fumes or mist, fire, explosion, polymerization, etc. Many of these are listed in Section 8.0.

Part II.A.7 Recordkeeping

128. Page 2A-30, second paragraph, second bullet: The text should read Rule ~~Chapter~~ 62-730.160, F.A.C.

129. Page 2A-33, third paragraph: Transfer placed inside the permitted storage area should be roped off to clearly identify it as 10-day transfer waste.

130. Page 2A-33, last paragraph: The text should read Rule 62-730.171, F.A.C. Also, 264.111 should be 265.111 Also, there is no regulatory citation listed as 62-730.180(10), F.A.C. What regulatory citation should replace this one? Also be advised that Chapter 62-730, F.A.C. was revised effective April 2013. Please go to <https://www.flrules.org/gateway/ChapterHome.asp?Chapter=62-730> for the latest version of this Chapter.

131. Page 2A-34, second paragraph, and second bullet: this sentence needs to be clarified.

132. The following exhibits are illegible. Submit legible copies:

1. Exhibit II.A.7.-1 Hazardous Waste Manifest
2. Exhibit II.A.7.-2
3. Exhibit II.A.7.-3

133. Exhibit II.A.7.-5 is cut off on the right side. Submit a complete exhibit.

134. Exhibit II.A.7.-8: The staging areas identified on this figure are inconsistent with the staging areas in Figure 1 D 1.

Part II.B Containers

135. Page 2B-3, paragraph 2 and Page 2B-4, item 3, third paragraph: Provide details on the fire wall (fire rating, construction characteristics, location, etc.). It is important that this information be included in appropriate sections of your Preparedness and Prevention Plan and/or Contingency Plan.

136. Page 2B-3, paragraph 2: The office is located in the southeast corner rather than the northeast corner. Also, Figure II B 1 is missing from the Part B.

137. Page 2B-3, paragraph 3: “Two 3.5-inchhigh” should be “inch high”

138. Page 2B-4, first sentence: Exhibit II.B.1-1 should be labeled (the MSDS for 1-Part Epoxy Concrete & Garage Floor Paint Slate Gray).

139. Page 2B-9, paragraph 3, first sentence. Double check to see if the reference to Figure II B 2 is correct because that figure doesn’t really illustrate the arrangement of drums. It illustrates the dimensions and layout of the cells.

140. Page 2B-10, first paragraph:

1. The wording appears to be incorrect. Should the second sentence state “...container is correct by ~~comparison~~ comparing the electronic tracking system...”?
2. “The electronic tracking system is a system that tracks every inbound and outbound...”. The “electronic tracking system” appears to be a smaller font than the remainder of the text.

141. Page 2B-10, paragraph 3: We suggest that the phrase “...or mixed with hazardous waste.” be clarified. We presume you mean that it will not be stored with hazardous waste in the same cell although you could also interpret the phrase to mean that you will not consolidate solid and hazardous wastes.

142. Page 2B-10, paragraph 4: The “hazardous waste storage area” should be “container storage unit”

143. Page 2B-11, paragraph 2: The last sentence indicates that a hand-held explosimeter will be kept on site after NFPA upgrades. Earlier in the Part B (Page 2A-21, last paragraph), it is indicated that the explosimeter is already available. Correct this inconsistency.

144. Page 2B-11, Consolidation and Stabilization Operations

1. Triumvirate cannot re-date wastes that are consolidated. The treated waste is allowed to remain on site for one year including cumulative timeframes for storage, consolidation and treatment.
2. As with the previous operator, if you wish to consolidate, a chemist needs to be on site. This was initially conveyed to Chemical Conservation Corporation approving the consolidation of acids in a letter dated December 18, 1997. The use of a trained chemist for the Commencement of Consolidation Activities was acknowledged in a letter from John Wyluda to Michael Eckhof as recently as February 13, 2013.

145. Page 2B-11, paragraph 3: "Hazardous waste storage unit" should be "container storage unit."

146. Page 2B-11, paragraph 4: References non-labpack consolidation of solid waste in bulk containers are addressed in the SW permit. Two items should state "non-hazardous solid waste" and currently labpacks are NOT addressed in the SW permit.

147. Page 2B-12, paragraph 3: The abbreviation RGN (Reactivity Group Name) should be identified (spelled out in its entirety) the first time it is used. This should be done with all abbreviations and acronyms or include a definitions page at the beginning of the Part B.

148. Page 2B-14, paragraph 2:

1. Cement is misspelled.
2. If only metals are intended for treatment, the reference to D012 (Endrin) should be removed.

149. Page 2B-14, Solidification and Stabilization Section: This is the appropriate section to include details of the solidification and stabilization process although we suggest they be discussed separately. Although in some cases, the meaning of solidification and stabilization can be the same, solidification, as defined in the first sentence means the addition of a material to a liquid waste in order to solidify the material. This process can be as simple as adding kitty litter to a container containing liquids. Stabilization, as defined in this paragraph, is a binding of leachable materials using an additive. Although details of the actual sampling (pre-/post-treatment) should be detailed in the WAP, the following items need to be addressed in this section.

1. Explain the types of equipment that will be used for mixing. Will a mix tub be used? If so, provide information on the mix tub (e.g., manufacturer's information, volume of mix tub, etc.). If a mix tub is used, explain how the treated material will be transferred to drums, rollofs or other containers.
2. If mixing is to occur in rollofs, explain how the mixing will be done to ensure that the wastes are thoroughly mixed. Thorough mixing is especially important if you intend to decharacterize the waste *and* treat to meet Land Disposal Restrictions. Sampling or the process for determining Underlying Hazardous Constituents (UHCs), and sampling to verify the decharacterization and LDR requirements should be in the WAP.
3. Is there sufficient room inside the Consolidation Area for a front-end loader or backhoe to mix the wastes in containers?
4. How will the front-end loader or backhoe be decontaminated? How frequently will the front-end loader or backhoe be decontaminated?
5. Provide additional information on the fly ash. Will testing be done on the fly ash prior to use (by you or the vendor) to determine metals' concentrations and pozzolanic

properties? Provide information on your storage of the fly ash (e.g., estimated volume, inside/outside storage, etc.).

6. Identify the additives proposed for solidification. Are cement and fly ash the only materials for solidification?
7. Identify the additives for stabilization. Are cement and fly ash the only materials for solidification?
6. Identify the intended use or destination of the stabilized wastes. Will all wastes be disposed in a permitted Subtitle D landfill?
7. Although sand blast grit is listed as a metal-bearing waste for treating, other anticipated or proposed waste streams should be included in this section.
8. It appears that only metal-bearing wastes/soils that are a characteristic hazardous waste are slated for treatment. Are metal-bearing listed wastes/soils or metal-bearing debris (solid material exceeding 60 mm particle size) slated for treatment? If so, details must be submitted with the Part B.

150. Page 2B-14, Solidification and Stabilization Section: The table on this page should be moved to page 2B-10.

151. Page 2B-17, paragraph 1: Suggest the clarification "...along south wall of the container storage unit, which..."

152. Page 2B-18, paragraph 1, last sentence: Inspection Forms (Figures II B 4 and II B 5) were not included.

Part II.K Closure

153. Page 2K-3: The first paragraph should point out that the closure plan includes closure of the transfer waste areas. In addition, this closure plan does not address the transfer facility although page 2A-33 acknowledges that the transfer facility have a written closure plan as required by subparagraph 62-730.171(3)(a)5, F.A.C.

154. Page 2K-3: The third paragraph: Keep in mind that if waste or contamination is immobilized, then the immobilized waste or contamination may have to be removed or postclosure may be required. Immobilization appears inconsistent with your objective in the next sentence: "...to remove contamination."

155. Page 2K-3: The last sentence: Chapter 62-785, F.A.C. applies to Brownfields, and does not apply to your facility, unless your facility qualifies as a Brownfields in the future.

156. Page 2K-5, second paragraph:

1. Identify the codes "CO, IH, MH, PH, RI and RX".
2. Include the maximum inventory for the Transfer Waste Areas.

157. Page 2K-5, third paragraph: Table II.K.1.c-1 (waste inventory table) is missing from the Part B.

158. Page 2K-5, last paragraph: The surface area for the transfer areas needs to be included. The staging areas for transfer facility are illustrated on page 2A-50.

159. Page 2K-6, first sentence: The term “waste group” is duplicated.

160. Page 2K-8: Decontamination of the Transfer Areas needs to be included here.

161. Page 2K-8, third paragraph: Describe collection of wash water, containerization and characterization prior to the rinsate sample. Will this water not be analyzed because you plan to assume it is hazardous or will it be sampled? Although procedures are likely to be similar, describe the collection of rinsewater, containerization and characterization. Include the chemicals and parameters that will be included in the characterization. That same question applies to the consolidation/stabilization section below.

162. Page 2K-8, fifth paragraph: Here and elsewhere in the closure plan, the text should be clarified to note that “...acceptable decontamination levels will be discussed with DEP, and will be based upon current rules and guidance at the time of closure.”

163. Page 2K-10, paragraph 2: We believe the sentence should read, “Decontamination waters generated from steam cleaning the container storage area, transfer waste areas and consolidation/stabilization areas will be properly characterized and managed ~~determined by The State DEP~~ at the time of closure.”

164. Page 2K-10, paragraph 2: The second sentence should be removed. Did you intend to state that a final rinsate sample will be taken as discussed earlier?

165. Page 2K-10, paragraph 4: This paragraph needs additional information. Soil samples from the top 6” for initial analysis is reasonable for the outside consolidation/stabilization areas. However, the sample location (depth) is unclear for samples taken underneath the container storage unit. In other parts of the application, the container storage building was constructed 4’ above land surface. This prevents run-on from storms. If the foundation of the building was constructed with outside walls and filled with soil before the floor was poured, the top 6” soil sample would be within this fill material. Although this interval would not represent native soils, it would be an appropriate interval for determining if contamination migrated through any cracks discovered in the floor. Please clarify.

166. Page 2K-10, paragraph 5: Provide details on the composite sampling:

1. Composites are not allowed for volatiles unless composited in the lab. Is this intended?

2. Will subsamples be taken from different depths at each location on Figure II K 1 and combined or are some of the sample locations (at 6" depths) proposed to be composited?
3. Sample locations are not proposed for the waste transfer areas or outside consolidation area.
4. We suggest some flexibility in sample location. It may be more important to sample outside the container storage, consolidation/ stabilization and transfer areas than through the concrete (except for cracks).
5. Volatile constituents must be included in the sampling although they may not be composited (except in the lab).

167. Page 2K-11, paragraph 2: The date "expected to begin" closure must be no later than 30 days after last receipt of hazardous waste (see 40 CFR Part 264 Subpart G). The 90 and 180 day periods are counted from the time after receiving the final volume of hazardous waste at the facility, not from the time the Department is notified of the beginning of closure activities.

168. Page 2K-14, Summary of Data Used to Estimate Costs for Disposal of Inventory

1. The Table is not labeled.
2. The Process Codes are not identified.
3. Should "HI" (Process Code for Waste fuels) be "IH" as noted on page 2K-5?
4. The last row should include decontamination water with a "DW" code as discussed on page 2K-5, paragraph 4.
5. The quantities and codes are inconsistent with the quantities reported on page 2K-5.

169. Page 2K-16, Summary of Data used to Estimate Cost of Transportation: AES is identified to transport 268 55-gallon drums of inorganics but they are not identified to do so on the table at the end of page 2K-14. On pages 2K-14 and 2K-16, Stablax is identified to transport the inorganics. You may have over-estimated costs here.

170. Page 2K-17, paragraph 2 (first paragraph under "Engineering"): At the end of the first sentence, we recommend that you add "...and requirements of the permit."

171. Table II.K.1.e.-1: This table and the discussions on page 2K-10, paragraph 5 need to be consistent. This table explains where the samples forming the composites originate but it does not include volatiles for each area or the flexibility in sampling outside locations (See comment 166 above).

172. Table II.K.1.g.-1a: Some of the codes and quantities for each waste are different than those listed on page 2K-5. The list does not appear to include used oil/antifreeze, or consolidation/ stabilization wastes. The Quantity for Corrosive Liquids should be 72 and the Quantity for Oxidizers should be 12. Then adjust the total.

173. Table II.K.1.g.-2a: You need to be consistent with the number of drums per truck. This number varies throughout the application.

174. Figure II K 1

1. There is no scale as required by the application instructions.
2. The bottom of the figure is cut off.
3. Identify the codes used for the sample location (e.g., SC, EC, NC and CA).
4. There are no samples proposed for the transfer area or identified for the outside consolidation area.

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

175. To the best of our knowledge, the “yes” boxes should be checked for at least the storage tank (used oil tank), waste recycling units (fluorescent bulbs, antifreeze) and “other” (stormwater retention pond) [Note: There are two Part II.P’s in the electronic submittal (files II.P.DEP.pdf and 730_2c.pdf) and both of these forms are different than the hard copy]. Together, Parts II.P and II.Q contain the SWMU information, and both sections must be completed. Submit a list of the SWMUs (narrative form or spreadsheet) and a description of each. The descriptions may be taken from the RFA but any updates should be included. As an example, it appears that the stormwater retention configuration has changed (shape and possibly location). Such changes must be added to the original description.

The Perma-Fix permit lists 13 SWMUs in Table A.7-No Further Action. However, you have additional SWMUs that should have been previously reported. As an example, the used oil tank by the loading dock is a SWMU. Your WAP (page 2AWP-19) identifies biomedical waste that may be stored on site in box trucks or waste transfer areas. Complete the attached Solid Waste Management Unit (SWMU) Profile Sheet for the Used Oil Tank (SWMU 14), Biomedical Waste Storage (SWMU-15 for the outside storage and the SWMU-1 description should be updated to include biomedical waste) and any other previously unidentified SWMUs. SWMUs, even if permitted, must be identified.

Your current permit also identifies three SWMUs that, collectively, comprise the container storage unit (SWMUs 1, 4 and 5). You may combine these into one SWMU (SWMU-1) together with the other wastes managed within the container storage facility such as fluorescent light bulbs, solid wastes and used antifreeze instead of identifying these wastes as new SWMUs. If combined, the descriptions of these different wastes and management information should be included along with the description and management portion(s) of the container storage unit (SWMU 1). Figures must also be included to show the location(s) where the bulbs, solid waste and antifreeze will be stored. SWMUs physically located outside the container storage unit will need to be identified as new SWMUs.

You must carefully evaluate your facility and determine if there are other unreported SWMUs (e.g., satellite accumulation areas, septic tanks/drainfields, solid waste units (even if permitted), etc.) that must be reported with the renewal.

Part II.Q Information Requirements for Solid Waste Management Units

176. Page 2Q-1/paragraph 1: "ADC" should be "AOC"

177. Page 2Q-1/paragraph 4: Insert narrative explaining the additional investigation that EPA required, and the results of the investigations.

178. Page 2Q-1/paragraph 5: The text needs to be changed because EPA's HSWA permit expired or was terminated.

179. Figure 1 D 1, Facility Storage Layout of SWMU's

1. This is one of two Figure 1 D 1s. The other is located in the Maps/Figures Tab, Facility Storage Layout.
2. Seven SWMUs (1, 2, 3, 6, 7, 9 and 13) are not identified on this figure.
3. It appears that the locations for SWMU-4 and SWMU-5 are incorrect. SWMU-4 is the Northeast Drum Storage Area, and SWMU-5 is the Northwest Drum Storage Area.
4. The waste recycling areas, although suggested to be part of SWMU 1 (See comment 175 above), must be identified on this map.

Part II.S Requirements for Equipment (including Tab "Part II.SA" Requirements for Tanks and Containers)

180. Page Sa-1: Throughout the page, m3 should be m³.

181. Page Sa-1, paragraphs 4 and 5: Containers must be inspected at least weekly, not annually.

Exhibits inserted into back pocket of application

182. Exhibits A.7-2 Land Disposal Restriction Notification, Exhibit II.A.7-3 UTS Notification, and Exhibit II.A.7 Hazardous waste Manifest are illegible. Submit clear, legible copies.

Solid Waste Management Unit (SWMU) Profile Sheet

183. Please provide an accurate record of the SWMUs listed in Attachment A and for any other SWMUs or AOCs not previously identified.

ACTION	DESCRIPTION
Number:	SWMU No.
Name:	Identification of SWMU
Unit Characteristics:	General description, including location, dimensions, SWMU components, construction material, and secondary containment.
Operational History:	Dates of operations and any operational permits or permit applications.
Current Status:	Active, inactive, physically closed, or certified closed.
Waste Characteristics:	Description of types, volumes, and hazardous or nonhazardous characteristics of waste media.
Waste Management:	Description of handling, treatment, storage, and disposal practices, including names and addresses of disposal facilities used.
Maintenance Procedures:	Description of maintenance and inspection procedures to assure unit integrity.
Release History:	Visual evidence or reports of hazardous materials releases, including associated dates and any regulatory actions performed.
Potential Pathways:	Potential migration pathways, such as air, surface water, groundwater, soil, and subsurface gas.
Exposure Potential:	Location and use of nearby water wells, surface water, and other potential human and environmental receptors.
Remedial Action:	Description of any remedial action performed due to past releases, including dates and types of remediation performed and waste media disposition.