

**Thursby, Kim**

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**From:** Phillip Pierre-Louis [ppierre-louis@wpcorp.net]  
**Sent:** Tuesday, September 10, 2013 2:14 PM  
**To:** Epost HWRS  
**Cc:** Kothur, Bheem  
**Subject:** World Petroleum Corp

Got it...

Thanks,

**Philip Pierre-Louis**  
**World Petroleum Corp**  
**3701 SW 47th Ave Suite #101, Davie, FL 33314**  
**954 327-0724,**  
**954 327-0755 Fax**  
[ppierre-louis@wpcorp.net](mailto:ppierre-louis@wpcorp.net)

## Thursby, Kim

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**From:** Epost HWRS  
**Sent:** Monday, September 09, 2013 2:03 PM  
**To:** emiranda@wpcorp.net  
**Cc:** Bahr, Tim; Goddard, Charles; kathy.winston@dep.state.fl.us;  
susan.eldredge@dep.state.fl.us; randy.j.miller@dep.state.fl.us; tor.bejnar@dep.state.fl.us;  
johnmjonespe@sbcglobal.net; ppierre-louis@wpcorp.net; lee.martin@dep.state.fl.us;  
dvanlandingham@broward.org; ayounes@broward.org; anthony.tripp@dep.state.fl.us;  
bheem.kothur@dep.state.fl.us  
**Subject:** World Petroleum Corp; FLD980709075; Request for Additional Information on Permit  
Renewal Application  
**Attachments:** 9-6-13-World Petroleum Corp Request for Additional Information.pdf  
**Tracking:**

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

September 9, 2013

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

Mr. Eric Miranda, President  
World Petroleum Corp  
3650 SW 47<sup>th</sup> Ave  
Davie, Florida 33314

RE: World Petroleum Corp  
EPA I.D. No: FLD 980 709 075  
Permit Number: 54228-HO-005/54228-SO-006  
Used Oil and Material Processing Facility Permit Application  
Notice of Deficiency

Dear Mr. Miranda:

The Florida Department of Environmental Protection (the Department) has reviewed your permit applications dated August 12, 2013, and August 29, 2013 and received on August 13, 2013 and August 30, 2013, respectively, to operate a Used Oil and Material Processing Facility in Davie, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled 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.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit one hard copy and one electronic copy response to the Tallahassee Solid and Hazardous Waste Regulation Section, and one hard copy to the Southeast District Office. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

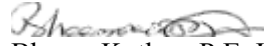
Mr. Eric Miranda, President

September 9, 2013

Page Two

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us)

Sincerely,



Bheem Kothur, P.E. III

Hazardous Waste Program and Permitting

BK/bk

Enclosure: Attachment

cc:

Kathy Winston, FDEP/Southeast District, [kathy.winston@dep.state.fl.us](mailto:kathy.winston@dep.state.fl.us)  
Susan Eldredge, FDEP/Tallahassee, [susan.eldredge@dep.state.fl.us](mailto:susan.eldredge@dep.state.fl.us)  
Randy Miller, FDEP/Tallahassee, [randy.j.miller@dep.state.fl.us](mailto:randy.j.miller@dep.state.fl.us)  
Tor Bejnar, FDEP/Tallahassee, [tor.bejnar@dep.state.fl.us](mailto:tor.bejnar@dep.state.fl.us)  
John Jones, P.E., [johnmjonespe@sbcglobal.net](mailto:johnmjonespe@sbcglobal.net)  
Philip Pierre-Louis, [ppierre-louis@wpcorp.net](mailto:ppierre-louis@wpcorp.net)  
Lee Martin, FDEP/Tallahassee, [lee.martin@dep.state.fl.us](mailto:lee.martin@dep.state.fl.us)  
David Vanlandingham, Broward County, [dvanlandingham@broward.org](mailto:dvanlandingham@broward.org)  
Ali Younes, Broward County, [ayounes@broward.org](mailto:ayounes@broward.org)

**ATTACHMENT**  
**September 9, 2013**  
**World Petroleum Corp**  
**Davie, Florida**  
**EPA I.D. No. FLD 980 709 075**  
**Permit No. 54228-HO-005/54228-SO-006**  
**Notice of Deficiency**

**Specific Comments:**

1. Please provide the Table of Contents to the Permit Application including Page Numbers with appropriate Attachment Identification. For Example: A, B, C, D or 1, 2, 3, 4 etc.
2. Used Oil Processing Facility Permit Application, Part I, and Part II - Certifications: It appears that the facility used the "Used Oil Processing Facility Permit Application Form Effective Date June 9, 2005" instead the facility should use the latest Permit Application Form Effective Date April 23, 2013. Please access the web to view the latest document at.  
[http://www.dep.state.fl.us/waste/quick\\_topics/forms/documents/62-710/710\\_6.pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-710/710_6.pdf)
3. Facility Storage Capacities, Page 12, Page 13, Page 35 (Table 3.2), Tank Summary, Page 50: The total storage capacities appears to be inconsistent throughout the application (For Example: 250,000 or 206,000 or 231,000, or the existing permit shows 241,500 gallons ). Please review the total storage capacities and revise as appropriate. Also, check the contents (waste oil/oily water or oily water/process oil) in the tables on page 35 and 50, and be consistent.
4. Site Plan Figure A 1.1 and Table 3.2, Page 35; A Comprehensive Range of Services, Page 12: Please review and identify the PCW tanks and Antifreeze tanks if the facility is collecting, storing and processing PCW and Antifreeze.
5. The Facility appears to be in violations in accordance with the Issued permit Part I - General And Standard Conditions 1, 2, 8, 9, 16, 22, 23, and 27. Also, Part II - Used Oil Processing Condition 7, Submittal of As Built Drawings, and Part VI - Closure Condition 1.e, and 2. Please explain in detail why the facility has not informed the Department according to the cited issued permit conditions regarding the relocation of tanks and submitted the appropriate documentation, including the tank closure reports.

6. Attachment B, A Comprehensive Range of Services, Antifreeze, Page 12: The form of recycling is considered disposal under the Departments Best Management Practices Guidelines, dated May 22, 2012. If antifreeze or other hazardous waste from conditionally exempt small quantity generators is accepted after mixture with used oil, please explain how World Petroleum Corporation will confirm the customer's rate of generation.
7. Appendix F, Calculation of Secondary Containment Capacity, Items 1, 3, and 4, Page 49: Total Containment Volume should be "58,972" instead of "60,256". The Net Containment Volume should be "37,481" instead of "38,765". The Ratio of Net Containment Volume should be "1.25" instead of "1.29". Please review these numbers and revise as appropriate. Also, correct the above ground tank rule citation to read 62-762, F.A.C., instead 62-761, F.A.C.
8. Appendix G, Record of Tank Integrity and Pressure Test, Page 50 and API 653 Tank Inspection Summary Form, Pages 51 through 90: The Inspection Forms appear to be incomplete, specifically the forms are not signed and the inspection reports are not included. Please review the application and revise as appropriate.
9. Appendix H, Emergency Contacts, Page 91: The facility indicates that their emergency response contractor is SWS, however; in Part A, two other companies are named as emergency contractors. Please review and revise the application as appropriate.
10. Appendix J, Discharge Response Equipment Inventory, Page 94: The facility lists the emergency response equipment on site and quantities thereof, but there is no mention of the equipment's capabilities or where it is located. Please review and revise as appropriate.
11. Appendix M, Contingency Plan and Emergency Procedure, Page 98: The Regulations on hazardous waste management state that at least one person must be designated to act in the position of emergency coordinator if this Contingency Plan is implemented. This person must have authority to commit the resources needed to carry out the Contingency Plan. Please review and revise the documents as appropriate.
12. Attachment H, Closure Plan, General, 106: The Closure Plan is not included in this application. The closure plan should include the closure schedule, and address all wastes that need to be tested for hazardous waste characteristics. The closure plan should also describe the decontamination process and how a

completion determination is made. Please review and revise the documents as appropriate.

13. Attachment I, Employee Training, Page 4, and Page 108: The Description of Employee Training is not addressed in this document. Also make sure to include the employee training program for USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. World Petroleum Corporation used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor D test kits will not assess the flammability of the materials World Petroleum Corporation may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.
14. Emergency Telephone Numbers, Page 101, and Page 105: Environmental Protection Agency, Region 4, Atlanta; the phone number should be "1-404-562-8700" instead "(707) 347-3012". Also, Florida Department of Environmental Protection, State Warning Point should be "1-800-320-0519" instead "(850) 413-9911". Please review and revise as appropriate.
15. Site Plan, A1.1: Evacuation Routes are not shown. Please review and revise the map as appropriate.
16. Site Plan, Used Oil Filters: The Site Map does not show the location where the drummed oil filters are stored. Please review the Site Plan and revise as appropriate.
17. Attachment D, Analysis Plan, Procedure, Page 18, 19, and 20, On-Specification Claim, 40 CFR 279.11, on-Specification Criteria: Total halides (halogens) cannot exceed 4,000 ppm to meet the on-spec determination. Total halides exceeding 1,000 ppm in the used oil must be rebutted or the used oil must be managed as hazardous waste. Please provide a Rebuttable Presumption Analysis Flow Chart in the Application. Also, please explain what is the basis of testing every 75, 000 gallons rather than every batch to determine if it meets the fuel specifications of 40 CFR 279.11.
18. Attachment E, Sludge, Residue, And Byproduct Management Description, Page 21: The proposed testing period of once a year is not acceptable. The hazardous waste determination should be made biannually instead of annually to verify any changes in the documented TCLP parameters.



19. Attachment E, Sludge, Residue, And Byproduct Management Description, Page 21: Please show on a map of the facility where this activity will be conducted. Please ensure that the sludges are also tested similarly?
20. Attachment G, Preparedness and Prevention Plan, Site Map A 1.1: Please update the map of the facility showing the location of all emergency equipment.
21. Attachment G, Preparedness and Prevention Plan, Page 33: Please add the FDEP Tallahassee (normal business hours) phone number to read (850) 245-8707, the State Warning Point (24 hour-spill contact) phone number to read (800) 320-0519 and EPA Emergency Response (Atlanta) phone number to read (404) 562-8700.
22. Attachment G, Preparedness and Prevention Contingency Plan, Page 42, Emergency Contacts: Please add the Oil Spill Contractors name and their emergency contact phone number. Also, add local address for all Emergency Contacts to the list.
23. Attachment B, Fire Protection and Emergency Action Plan, Item 10.6, and 10.7, Page 42: Please add the Hazardous Materials Clean-up Contractor and the Alternate Emergency Coordinator Cell Numbers.
24. Attachment B, Fire Protection and Emergency Action Plan, Page 42: The Facility has not listed the contact numbers for the police and EMTs. In addition to this, please provide non-emergency telephone numbers of the closest fire and police station, as well as, the nearest hospital. Facility may list both and instruct their people to call the 911 number in emergencies, but both numbers need to be included. Please review and revise as appropriate.
25. Attachment G, Unit Management, Page 29, Table 3.2, Aboveground Storage Tanks: Please include PCW tanks to the tank table.
26. Attachment I, Employee Training, Page 108: The Employee Training list should update the records including name of the employee, date and type of training including 8 hours refresher course.
27. Facility should update the site map in accordance with the comments addressed in this NOD and re-submit in an electronic format (pdf preferred) so that this map can be inserted into the permit.

28. Facility should revise the used oil tank table in accordance with the comments in this NOD and re-submit in an electronic format (pdf preferred) so that this tank table can be inserted into the permit.

**Solid Waste Permit Application General Comments:**

29. In the solid waste application, Section A.16, the narrative indicates wastes may be consolidated for shipment and solidification may be performed to allow placement in landfills, however, no details describing the solidification processes, materials to be used, where and how the wastes will be managed, or what quantities will be processed are included in the Process Description for Solid Waste Management narrative. If solidification is to be performed, please provide details of the process.
30. No financial assurance details or closure cost estimates were provided with the solid waste application.
31. In the Process Description for Solid Waste Management, the wastes received will be other than oily solid wastes and may include wastes generated from remedial activities, site investigations, and industrial processes, however, no description of employee training was included. Please describe employee training to be provided to ensure unauthorized wastes are removed from the waste stream and placed in appropriate containers for disposal at a permitted facility.
32. In the Process Description for Solid Waste Management, when consolidation is performed, drums will only be opened during transfer but there is no language describing the management of the roll off container/s. Will they be covered? Where will they be stored? How will leakage be managed? How often will they be removed to a disposal facility?
33. In the Process Description for Solid Waste Management, the maximum amount of solid waste stored at the site, including treated material, will be 40 tons. What combination of 55 gallon drums and roll off containers is anticipated to equate to 40 tons?
34. In the Facility Closure Procedures, when will the constituents for liquid and soil samples taken as part of the closure sampling plan be identified/approved?