



South Carolina Department and Environment

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Post-It® Fax Note	7671	Date	2/10	# of pages	1
To	Clark Env.	From	Joanna H.		
Co./Dept.		Co.	DMNI		
Phone #		Phone #	ext 209		
Fax #		Fax #			

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. FL 990061947		Document no. 11844		of 1 required by Federal law, but is by State law.					
3. Generator's Name and Mailing Address CSW Energy, Inc. P.O. Box 782 Bartow FL 33830				A. State Manifest Document Number							
4. Generator's Phone (941) 534-1141				B. State Generator's ID							
5. Transporter 1 Company Name Clark Environmental, Inc.				C. State Transporter's ID							
6. U.S. EPA ID Number FL R000009605				D. Transporter's Phone (861) 464-4844							
7. Transporter 2 Company Name Freehold Carriage, Inc.				E. State Transporter's ID							
8. U.S. EPA ID Number NJ D064128164				F. Transporter's Phone (808) 462-1001							
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER, SC 29150				G. State Facility's ID							
10. U.S. EPA ID Number S C D 0 3 6 2 7 5 6 2 6				H. Facility's Phone 803-773-1400							
11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number) H/M a. RQ, Hazardous waste, liquid, n.o.s.(benzene), 9, NA3082, PG III X				12. Containers No. Type 002 DM		13. Total Quantity 00110					
				14. Unit G		I. Waste Number 0018					
J. Additional Descriptions for Materials Listed Above a. SF-31029-0018 b.				K. Handling Codes for Wastes Listed Above a. S01, MD41							
15. Special Handling Instructions and Additional Information a. Oil-Water Separator Sludge Site Address: 1801 Clear Springs Road, Bartow, FL ERG #: a. 126 Emergency Contact (941) 534-1141 CEI #: 871662				Public reporting burden for the collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing the burden, to Chief Information Policy Branch, PM 223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name Coryne Johnson				Signature Coryne Johnson		Month Day Year 02 05 99					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Wesson Joyce				Signature Wesson Joyce		Month Day Year 02 05 99					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Perry Atkins				Signature Perry Atkins		Month Day Year 02 05 99					
19. Discrepancy Indication Space				a. lbs. c. lbs. b. lbs. d. lbs.							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Lisa Simon								Signature Lisa Simon		Month Day Year 02 05 99	

Emergency Contact Telephone Number
(727) 722-4299

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. FLT-980061287	Manifest Document No. 11550	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address National Uniform Service, Inc. 1420 Peachtree Street, N.E. Atlanta, GA 30309				A. State Manifest Document Number	
4. Generator's Phone (727) 722-4299				B. State Generator's ID	
5. Transporter 1 Company Name Clark Environmental, Inc		6. US EPA ID Number FLR000009605		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (561) 484-4884	
9. Designated Facility Name and Site Address Safety-Kleen (Bartow), Inc. 170 Bartow Municipal Airport Bartow, FL 33830		10. US EPA ID Number FLD980729610		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (941) 533-6111	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. <input checked="" type="checkbox"/> Toxic liquids, organic, n.o.s. (o-isopropoxyphenol methylcarbamate), 6.1, UN2810, PG II		No. Type			Waste No.
		.001 DM		.00035	G
b. <input checked="" type="checkbox"/> RQ, Waste fluorosilicic acid, 8, UN1778, PG II		.002 DF		.00110	G
					D002
c. <input checked="" type="checkbox"/> RQ, Waste corrosive liquid, basic, inorganic, n.o.s. (sodium silicate), 8, UN3266, PG II		.001 DF		.00055	G
					D002
d. <input checked="" type="checkbox"/> RQ, Waste corrosive liquid, basic, inorganic, n.o.s. (sodium silicate), 8, UN3266, PG II		.001 DF		.00055	G
					D002
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. ZEP 10X Insecticide (2)		a. S01 M041			
b. Turboizer - Hydronuosilicic Acid Solution (15, 16)		b. S01 M121			
c. Special Alkali # 45 Sodium Silicate Sol'n (17, 18)		c. S01 M121			
d. Special Alkali # 45 Sodium Silicate Sol'n (17, 18)		d. S01 M121			
15. Special Handling Instructions and Additional Information					
Approval #: a. BTNus-001 b. BTNus-004 c. BTNus-005 d. BTNus-006					
Site Address: 2440 U.S. Hwy 98 North, Lakeland, FL					
ERG #: a. 154; b. 154; c. 154; d. 154					
CEI # 661627					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.					
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Printed/Typed Name MIKE KORTAS		Signature <i>M. Kortas</i>		Month Day Year 11/06/98	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Wesson Joyce		Signature <i>Wesson Joyce</i>	
				Month Day Year 11/06/98	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
				Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Robert C. G...		Signature <i>Robert C. G...</i>		Month Day Year 11/06/98	

TRANSPORTER #1

**UNIFORM HAZARDOUS
WASTE MANIFEST**
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest
Document No.

22. Page

Information in the shaded areas is not
required by Federal law.

ELT 98.0061287

11550

2

23. Generator's Name

National Uniform Service, Inc.

1420 Peachtree Street, N.E.

(727) 722-4299

Atlanta

GA 30309-

L. State Manifest Document Number

M. State Generator's ID

N. State Transporter's ID

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

24. Transporter Company Name

Clark Environmental, Inc

25. US EPA ID Number

FLR00009605

26. Transporter Company Name

27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers

30. Total
Quantity31. Unit
WVVol

R. Waste No.

HM

a.

Corrosive liquid, basic, organic, n.o.s. (morpholine), 8, UN3267, PG III

No.

Type

001

DF

00020

G

b.

RQ, Waste corrosive liquid, basic, organic, n.o.s. (morpholine, cyclohexylamine), 8, UN3267, PG III

001

DF

00030

G

c.

Corrosive liquid, basic, organic, n.o.s. (morpholine), 8, UN3267, PG III

001

DF

00030

G

d.

Industrial waste, liquid - Non regulated material

001

DM

00035

G

e.

Industrial waste, liquid - Non Regulated material

001

DM

00020

G

f.

g.

h.

i.

S. Additional Descriptions for Materials Listed Above

a. Zep-Sanex Industrial Cleaner (8)

T. Handling Codes for Wastes Listed Above

a. S01, M121

b. S01, M121

c. S01, M121

a. NC-1003-C - Morpholine Solution (22)

b. NC-1005-C - Morpholine & Cyclohexylamine (23)

c. NC-1010-C - Morpholine & Cyclohexylamine (24)

d. Zep Amine A - Disinfectant/Sanitizer (8)

32. Special Handling Instructions and Additional Information

Approval #: a. BTNUS-006; b. BTNUS-007; c. BTNUS-008; d. BTNUS-002; e. BTNUS-003

ERG #: a. 153; b. 153; c. 153

33. Transporter Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy Indication Space



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE
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(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. <u>FLT980061287</u>	Manifest Document No. <u>11551</u>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.
3. Generator's Name and Mailing Address National Uniform Service, Inc. 1420 Peachtree Street, N.E. Atlanta GA 30309		4. Generator's Phone (727) 722-4299		A. State Manifest Document Number	
5. Transporter 1 Company Name Clark Environmental, Inc.		6. U.S. EPA ID Number <u>FLR000009805</u>		B. State Generator's ID	
7. Transporter 2 Company Name Freemhold Cartage, Inc.		8. U.S. EPA ID Number <u>NJID054126164</u>		C. State Transporter's ID	
9. Designated Facility Name and Site Address SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER, SC 29150		10. U.S. EPA ID Number <u>SCD036275626</u>		D. Transporter's Phone (981) 464-4824	
11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		E. State Transporter's ID	
a. <input checked="" type="checkbox"/> RQ, Waste paint related material, 3, UN1263, PG III		1001 DM		F. Transporter's Phone (803) 462-1001	
b. <input checked="" type="checkbox"/> RQ, Waste paint related material, 3, UN1263, PG III		1001 DM		G. State Facility's ID	
c. <input type="checkbox"/>				H. Facility's Phone (803) 773-1400	
d. <input type="checkbox"/>				I. Waste Number	
J. Additional Descriptions for Materials Listed Above		13. Total Quantity		14. Unit Wt/Vol	
a. <u>SE 30542 DOW</u>		00066		G	
b. <u>SE 30593 DOW</u>		00005		G	
15. Special Handling Instructions and Additional Information		Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
a. ZEP Map And Seal (5) b. ZEP-O-SEAL Concrete Floor Sealer (8)					
Site Address: 2440 U.S. Hwy 90 North, Lakeland, FL					
ERG #: <u>6.127 6.127</u>					
Emergency Contact: (727) 722-4299 CEI #: <u>001427</u>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.					
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Printed/Typed Name MIKE KORTAS		Signature <i>M. Kortas</i>		Month Day Year <u>11/01/98</u>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Type Name Wesson Joyce		Signature <i>Wesson Joyce</i>		Month Day Year <u>11/06/98</u>	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name Perry Atkins		Signature <i>Perry Atkins</i>		Month Day Year <u>11/08/98</u>	
19. Discrepancy Indication Space		a. <input type="checkbox"/> lbs. c. <input type="checkbox"/> lbs. b. <input type="checkbox"/> lbs. d. <input type="checkbox"/> lbs.			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Tom Anderson		Signature <i>Tom Anderson</i>		Month Day Year <u>11/13/98</u>	

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WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Part 121 of Act 651, 1996, as amended

Failure to file may subject you to
criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Form Approved: OMB No. 2050-0039

Please print or type.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

FLT 980061287

Manifest
Document No.
115522. Page 1
of 1Information in the shaded areas
is not required by Federal
law.3. Generator's Name and Mailing Address
National Uniform Service, Inc.

1420 Peachtree Street, N.E.

Atlanta

GA 30309

A. State Manifest Document Number

MI 7015230

B. State Generator's ID

4. Generator's Phone (727) 722-4299

6. US EPA ID Number

FLR000009605

C. State Transporter's ID

5. Transporter 1 Company Name

Clark Environmental, Inc

D. Transporter's Phone (561) 464-4884

7. Transporter 2 Company Name

Freehold Cartage, Inc.

8. US EPA ID Number

NJD054126164

E. State Transporter's ID

F. Transporter's Phone (908) 462-1001

9. Designated Facility Name and Site Address

Envotech Management Services

49350 N. I-94 Service Drive

Belleville

MI 48111-

10. US EPA ID Number

MID000724831

G. State Facility's ID

H. Facility's Phone

(800) 592-5489

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
ID NUMBER)

a. X RQ, Waste sodium hydroxide solution, 8, UN1824, PG II

b. X RQ, Waste sodium hydroxide solution, 8, UN1824, PG II

c. X RQ, Waste sodium hydroxide solution, 8, UN1824, PG II

d. X RQ, Waste corrosive liquid, basic, inorganic, n.o.s. (potassium
hydroxide), 8, UN3262, PG II

J. Additional Descriptions for Materials Listed Above

a. Turbopower - Alkaline Laundry Detergent (15)

c. Polysperse - Alkaline Cleaner (20.21)

b. Boiler Klean - Alkaline Cleaner (10)

d. 1200-2-L - Potassium Hydroxide Solution (25)

Emergency Contact: (727) 722-4299

per Bobby Patterson @ Clark Env.

K. Handling Codes

a. S01, M121

b. S01, M121

c. S01, M121

d. S01, M121

12. Proper Shipping Name, Hazard Class, and ID Number

Site Address: 2440 U.S. Hwy 98 North, Lakeland, FL

CEI #: 681527

G/P
10/1416. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the
present and future threat to human health and the environment; OR: If I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

MIKE KORTAS

Signature

Date

Month Day Year

10/14/98

Date

Month Day Year

10/14/98

Date

Month Day Year

10/14/98

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

W. J. Jones Joyce

Signature

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Perry Atkins

Signature

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

DUANE JONES

Signature

Date

Month Day Year

10/14/98

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4700 OR OUT OF STATE AT 1-800-252-4700. CENTER AT 1-800-252-4700 24 HOURS PER DAY.



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Failure to file may subject you to
criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Form Approved OMB No. 2650-0039

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. FLT 950061257		Manifest Document No. 11553		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address National Uniform Service, Inc. 1420 Peachtree Street N.E. Atlanta GA 30309						A. State Manifest Document Number MI 7015231							
4. Generator's Phone (770) 722-4244						B. State Generator's ID							
5. Transporter 1 Company Name Clark Environmental, Inc.						C. State Transporter's ID							
6. US EPA ID Number FLR000008605						D. Transporter's Phone (661) 464-8814							
7. Transporter 2 Company Name Freehold Cartage, Inc.						E. State Transporter's ID							
8. US EPA ID Number NJD054126164						F. Transporter's Phone (908) 462-1001							
9. Designated Facility Name and Site Address Envotech Management Services 49350 N. I-94 Service Drive Belleville MI 48111						G. State Facility's ID							
10. US EPA ID Number MID000724831						H. Facility's Phone (800) 592-5489							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. X Corrosive liquid, basic, organic, n.o.s. (morpholine), 8, UN3267, PG III						001 DF		00035		G			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above a. NC-1003-C - Morpholine Solution (43) 100998 MO per Bobby Patterson @ Clark Emergency Contact: (770) 722-4280 ERG # a. 153 Site Address: 2440 U.S. Hwy 98 North, Lakeland, FL CEI # 681627 Tracking purposes only										K. Handling Codes 601, M121			
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Printed/Typed Name MIKE KORTAS						Signature <i>[Signature]</i>						Date Month Day Year 10/1/98	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name W. H. S. O. J. S. O.						Signature <i>[Signature]</i>						Date Month Day Year 10/1/98	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Perry Atkins						Signature <i>[Signature]</i>						Date Month Day Year 10/1/98	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Duane Jones													
Signature <i>[Signature]</i>						Date Month Day Year 10/1/98							

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4768 OR OUT OF STATE AT 517-373-7568 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6802 24 HOURS PER DAY.

Reasonable assurance that the proposed project will cause minimal adverse environmental impacts has not been provided. Supporting information has not been provided to the Department demonstrating compliance with the soil thermal treatment requirements of F.A.C. 62-775. A list of concerns follows:

(1) A well inventory as required by Chapter 62-775.610, F.A.C. of all potable, agricultural and industrial water supply wells located within one mile of the site was not provided. This inventory should include SWFWMD records, Polk County Public Health Unit records, and a drive through reconnaissance of the area. The locations shall be identified on a 7.5 minute quadrangle. Construction details, lithology logs, type of use and pumping details (pumping rate, duration, frequency, and cone of depression radius) shall be provided for each well as applicable.

(2) The Chapter 62-775, F.A.C., groundwater monitoring wells should have been located immediately down gradient of and adjacent to each potential source area associated with the thermal operation. Typical source areas include the leachate collection sumps, pretreatment soil storage areas, scale(s) for weighing potentially dripping contaminated media, hopper, etc. It is not clear whether the two proposed buildings have individual leachate sumps or whether both drain to the existing 1000 gallon sump in Building 2. Other potential sources of contamination were not indicated. The MW-1 location would be acceptable to monitor background quality. The proposed location for MW-6R is not acceptable because it is not close enough to the building and identified potential sources of ground water contamination.

(3) Analytical results listed in Table 2, Appendix C, raised concerns for groundwater quality in monitoring well MW-4. The dissolved oxygen and the pH measurements were significantly different from the other four wells. It was unclear why groundwater parameters were so different and whether this well would be acceptable to detect or monitor potential problems from the soil to be stored, treated, and stockpiled at the proposed soil thermal treatment facility. The low pH may alter natural background metal concentrations. Metal concentrations may be elevated in this well and it would be difficult or perhaps impossible to know if soil treated at the thermal treatment process somehow contributed or would be responsible for additional groundwater contaminants detected in the well or perhaps the other wells proposed. Typically, a Chapter 62-775, F.A.C. groundwater monitoring plan would be sufficient to identify existing conditions and be designed with local geologic and hydraulic considerations so that any contaminants would be detected if released from the Chapter 62-775, F.A.C. treatment

facility. It is the intent of 62-775, F.A.C. to insure that the treatment process maintain groundwater quality and not increase any contamination concentrations. Additional wells could be considered to demonstrate that groundwater contamination is considered "background" or coming from another source.

(4) It was not clear how MW-6 was destroyed. The well appears to be located far from traffic patterns. It should have been replaced before submitting this application.

(5) At least three deep soil borings located in the immediate area would be needed to establish the lithology sequences, the site specific thickness and the site specific lateral continuity of (a) the surficial aquifer and (b) the underlying confining unit.

(6) A thickness of 100 feet for the surficial aquifer was used (see page 13) to calculate the aquifer transmissivity. Figure 4 indicates that the depth of the surficial aquifer is 6 to perhaps 10 feet below land surface. An assumed surficial aquifer thickness of 100 feet may not be appropriate.

(7) The vertical hydraulic conductivity of the surficial aquifer and of the confining unit was not provided.

(8) Lithology logs and specific well construction details were not provided for each monitor well as required in the groundwater monitoring plan, i.e. MW-1 and the four new wells. A description of the type of casing joints was also not provided.

(9) Specific locations of and a discussion of all offsite potential sources of groundwater contamination located within one mile of this facility was not provided.

(10) No impervious surfaces are present on site, other than the buildings. Site procedures to address incidental spillage and methods to keep contaminated media off the exposed ground was not provided.

(11) A proposal to collect the groundwater elevation data from all existing and new monitor wells was not provided. A proposal to concurrently measure surface water elevations (lakes, wooded wetlands, etc.) relative to groundwater elevations, during all quarterly groundwater sampling events was not provided.

(12) Groundwater quality data from MW-1 and the four new wells was not provided (Analytical method detection limits must be less than or equal to the Chapter 62-520/550 F.A.C. groundwater standards and minimum criteria). In addition, the analyses must specifically include methyl tert butyl ether (MTBE) which was not included on the submitted lab reports.

(13) A proposal for quarterly reports to include all lab results, plotted and contoured groundwater elevation data, and the field parameter data was not provided.

(14) Procedures to insure that dust and other airborne contaminants do not falsely contaminate the groundwater samples during the collection process were not provided.

(15) A proposal to collect groundwater samples for metals analysis using a low flow peristaltic pump and procedure was not provided.

(16) The nomenclature for the Hawthorn Group and the Ocala Limestone needs to be updated, pursuant to Florida Geological Survey Bulletin #59 (*The Lithostratigraphy of the Hawthorn Group (Miocene) of Florida* by Thomas M. Scott, 1988) and Special Publication #32 (*Florida's Ground Water Quality Monitoring Program Hydrogeological Framework* by Copeland et al, 1991).

(17) The northwest retention pond on the Site Plan, Figure 1, was not to scale.

(18) According to the Site Plan, Figure 2, the size of proposed Building 4 is 100' X 120', in the text the dimensions are stated as 70' X 100'. The dimensions were inconsistent.

(19) A description of the surface water drainage structures and estimated sheetflow across the site was not provided. A discussion of how the construction of the new buildings and driveways will affect the site's surface water drainage was not provided.

(20) The design and as-built drawings for buildings 2, 3, and 4 were not provided. The reported slab thickness for Building 2 does not meet the 4-inch minimum thickness requirement. No indication of how the facility will comply with the 10-7cm/sec maximum hydraulic conductivity for the slabs was provided.

(21) The roof of building 2 is reported to be 32 feet in height and the building is open on two sides. No indication of how rainfall is to be prevented from coming into contact with the stockpiled soil was provided.

(22) It was not indicated when and at what temperature the treated soil would be sampled. The location of all sampling points was not identified on the Process Flow Diagram.

(23) The time to reach operating temperature or shut down to a safe temperature was not provided.

(24) As stated on page 3, uncontaminated soil will not be used for blending; however, a statement whether decontaminated soil would not be used for blending was not provided.

(25) In section 62-775.400 of the permit application, it was not clear if soils that fail TRPH would also be analyzed for VOC and BTEX. The analytical methods and quality assurance considerations were not provided.

(26) No description of the material handling procedures to be employed pending the receipt of analytical results was provided. No indication of laboratory response time was necessary to accommodate the process was provided.

(27) A discussion of the Update 3 revisions to SW846 and its implementation for VOC sampling was not provided. A method for composites versus discrete, undisturbed sampling was not discussed.

(28) The application did not indicate how the facility will evaluate and manage soil contaminated with used oil containing more than 1000 ppm of total organic halides. The application did not indicate how the facility will demonstrate that the used oil does not contain a hazardous waste.

(29) The submittal did not clearly state that only soils contaminated with petroleum products will be accepted for treatment. The facility will not treat hazardous waste soils; the facility must also not treat soils contaminated with other materials, such as paint.

(30) The submittal was not clear on the difference in the regulatory status of soils contaminated by petroleum from a UST versus soils contaminated from spills from an AST or

transportation spill. The first has an exemption, and may be treated even if it fails TCLP for benzene. The rest is not exempt and may only be treated if it doesn't fail TCLP.

(31) The location of the screening process area was not identified. The screening process was not included in the Process Flow Sheet. It can be expected that screened debris will contain petroleum residues as a result of contact with the contaminated soil. A discussion of how the screened debris would be managed in order to prevent leaching of contaminants into the environment was not provided.

(32) The Process Flow Diagram did not include all soil thermal treatment operations, including staging and testing of the soil upon arrival and after treatment, processing of the "floor" leachate and the location of the process controls. A description of processes and an identification of which processes are batch operation and which are continuous flow was not provided.

(33) In section 62-775-620, page 4, it is not clear if "receiving" includes pre-acceptance procedures. Screening procedures prior to acceptance and verification procedures were not provided.

(34) In section 62-775.620(a-c), page 4, it was not indicated whether or not the leachate sumps are polyurethane lined. The frequency of sump inspections to determine cracking or leaking was not provided. It was not stated that leachate that fails HW characteristics for D001, D002 or TC toxicity for D004-D017 must be treated as hazardous waste, not treated on site or disposed of as industrial waste water.

(35) The permit application contains statements which indicate the potential for hazardous and unacceptable soils to be received at the site. No discussion of how the facility will characterize and handle any leachate that has collected in the floor sump from these hazardous soils was provided.

(36) On page 15, the report indicates that contaminants were present at levels of concern; no organic compounds were detected according to results presented in Appendix F. This discrepancy was not explained.

(37) A description of how the facility will insure that the baghouse fines meet the clean soil criteria of Chapter 62-775.400, F.A.C. was not provided (note they propose to mix

baghouse fines with the treated soil). Locations where treated soil are to be stored were not provided.

(38) The Permit submittal does not include sufficient information regarding the handling, treatment, and disposal/reuse of PCB containing soils. A detailed description of how the facility will comply with all the Chapter 62-775, F.A.C., criteria for PCB containing soil was not provided. No discussion of how the PCB containing soils will be disposed of or reused was provided.

(39) The Permit submittal does not include sufficient information regarding the handling, treatment, and disposal/reuse of PCB containing soils. A detailed description of how the facility will comply with all the Chapter 62-775, F.A.C., criteria for PCB containing soil was not provided. No discussion of how the PCB containing soils will be disposed of or reused was provided.

(40) The process of re-treating any soils that fail to comply with Chapter 62-775, F.A.C. was not provided.

(41) A discussion of the facility's emergency response and contingency plans for security and fire safety measures was not provided.

A person whose substantial interests are affected by this section may petition for an administrative (proceeding) hearing in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Notice. A petitioner other than the applicant shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request

an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of the facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition and to become a party to the proceeding. The petition must conform to the requirements

specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. Mediation is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from

the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

 5.1.58

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/amb

Copies furnished to:

Larry Morgan, OGC Tallahassee
Beth Knauss, BWC Tampa
William Kutash, Program Administrator, BWC Tampa
Mary Yeargan, Tampa
Tom Douglas, BWC Tallahassee
Zoe Kulakowski, BWC Tallahassee

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF DENIAL TO USE A GENERAL PERMIT and all copies were mailed before the close of business on

Anna Black to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
Section 120.52(11), Florida
Statutes, with the designated
Department Clerk, receipt of which
is hereby acknowledged.

Anna Black
(Clerk)

5-1-98
(Date)



Department of Environmental Protection

RB 11

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

SITE INSPECTION REPORT

OWNER/OPERATOR: Jim Clark and Elizabeth Clark
MAILING ADDRESS: 755 Prairie Industrial Parkway
Mulberry, Fl. 33860

**INSPECTION
DATE:** June 4, 1998

NAME OF SITE: CEI Material Processing Facility
SITE ADDRESS: (same as above)
CITY: Mulberry

PERMIT NO: 38627-001-SO

REASON FOR VISIT:

- COMPLIANCE INSPECTION X
- PERMITTING INSPECTION
- COMPLAINT INVESTIGATION

PERSONS PRESENT: Susan Pelz, Danielle Nichols (FDEP);
Beth Clark, Jim Clark, Steve Hanley (Clark Env.)

SUMMARY REPORT:

This inspection was a general compliance inspection. This report is a supplement to the inspection report which was completed at the conclusion of the inspection. Comments in this report are not intended to be comprehensive, but are to detail specific areas of concern which were discussed at the inspection. During the inspection, I randomly selected two drums to check for compliance with the recordkeeping requirements of the permit. The first drum was marked "20011 - D05 Millennium, Ash - Boiler Soot." The second drum was marked "600 - D01 Orange Industrial, baghouse bags." CEI showed us copies of the "Non-hazardous Waste Manifest" forms and "Waste Profile" sheets for each of these drums.

The "boiler soot" profile included analyticals dated July 26, 1995. I asked if any recent analyticals had been done. CEI indicated that more recent analyticals had not been done. Jim Clark explained the process which generated this waste. The boiler was not a hazardous waste incineration unit. We discussed the requirements of the permit with regard to "consistent" industrial waste streams. See Specific Condition [SC] #11.a(4). Although the permit does not specify the minimum frequency for the industrial facility's "confirmation...that the process had not changed since the analyses were performed," after some discussion, it was agreed by CEI and the Department that the industrial facility should "re-confirm" at least annually. CEI indicated that they would consider including a "re-confirmation" statement on their Non-Hazardous Waste Manifest forms. By this statement, the generator would confirm that the process which generated the waste had not changed since the most recent analyticals were done. Either an annual re-confirmation from the generator, or the proposed change to the Non-Hazardous Waste Manifest would be acceptable for compliance with SC #11.a(4).

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The "baghouse bags" had no analyticals. I asked if the generator had provided, or CEI had performed analyticals on this material. CEI explained the process which generated the bags. The bags are located on vac trucks for particulate control during dry vacuum operations. The particular generator, Orange Industrial, reportedly cleans out decorative fountains (e.g. at Disney World), other industrial sumps, and also conducts cleanup of petroleum related spills (emergency response?). CEI indicated that neither they nor the generator had performed any analyticals on this waste stream. I indicated that I would discuss this material with other DEP staff to evaluate the potential for this material to be hazardous. After some discussion with RCRA staff, it does not appear that analyticals for this type of waste have been commonly (if ever) encountered such that the waste stream would be "assumed" to be "non-hazardous." It does not appear that this material has been adequately characterized to be considered "non-hazardous."

I also asked to review other Waste Profile sheets for "600" (Orange Industrial) to clarify a description on one of the sheets. The description of the waste on one of the profiles I reviewed had been changed (hand-written). This waste (600 - D015? or D011?) was originally described as "spent catalyst" but had been changed to indicate that it was an unused product, and an MSDS sheet was attached for analytical (waste acceptance) purposes. CEI indicated that the generators have copies of CEI's Waste Profile sheets, and that they generally characterize their wastes in terms consistent with the Waste Profile. If this is the case, and the Waste Profile sheet is changed, then the generator should have a revised Waste Profile sheet. If the generator does not have a revised Waste Profile sheet, then their characterization of the waste may not be correct. Is the waste a "spent catalyst" or an unused product? If it is a "spent catalyst," then an MSDS sheet would not be an adequate characterization of the waste. We discussed this at length, and CEI agreed to ensure that its customers have the correct Waste Profiles.

RECOMMENDATIONS:

1. Please provide analyticals from a representative sample of the baghouse bags. If the generator demonstrates that the process which generates this waste stream is a "consistent industrial waste stream," then documentation which complies with SC#11.a(4) would apply. (See discussion above.) However, in order to demonstrate that the waste is a consistent industrial waste stream, the generator must show that the types and sources of contamination which are serviced by the vac trucks are consistent. If the generator does not demonstrate that the baghouse bags are a consistent industrial waste stream, then analyticals must be performed (by the generator or CEI) to demonstrate that the materials are "non-hazardous."

DEP REPRESENTATIVE: _____

Susan J. Pelz, P.E., Solid Waste Section

6/16/98
Date Mailed to Facility

cc: Beth Knauss, FDEP RCRA



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Mr. Jim Clark
Clark Environmental Inc.
755 Prairie Industrial Parkway
Mulberry, Fl. 33860

February 17, 1998

RE: Solid Waste Volume Reduction/Processing Facility
Permit No. 38627-001-SO, Polk County

Dear Mr. Clark:

This letter is to acknowledge receipt of the following information:

1. Received October 22, 1997. MSDS Sheets for the following:
 - a. Fatty Amide - Westvaco Corp.;
 - b. A002, Ammonium Lignosulfate - Tembec Inc.;
 - c. Adhesive AB Drum - Franklin International;
 - d. Ucare Polymers KR-125, 400, 30M - Amerchol Corp.;
 - e. Lanolin, hydrous - J.T. Baker, Inc.;
 - f. Lanette Wax O, Cetearyl Alcohol - Henkel Corp.;
 - g. Glyceryl Monostearate - Smith & Nephew United Inc.;
 - h. Petrolatum (not an MSDS Sheet, the source of this information is unclear);
 - i. SoloSite Wound Gel, Glycerol X181 polymer - Smith & Nephew United Inc.;
 - j. UniSalve Protective Ointment - Smith & Nephew United, Inc.;
 - k. UniCare Lotion - Smith & Nephew United, Inc.; and
 - l. Lini-Derm (Uni-Derm?) Moisturizer - Smith & Nephew united, Inc.
2. Received January 16, 1998. Fax requesting approval of batteries for acceptance, including:
 - a. Eveready letter dated May 12, 1994 and summary of TCLP results, November 1991;
 - b. RayoVac letter dated May 11, 1994 and 1993 TCLP testing;
 - c. Memorandum from Jeffery Blake to Gwen Shofner dated May 24, 1994 and TCLP analysis dated June 1992 and April 1993; and
 - d. Phos Lab results for Phoenix Phospors (it is not clear if this is the mylar plastic information as indicated on the fax).
3. Received January 21, 1998. Cement Kiln Dust analyses dated:
 - a. 1998 - January 14; and
 - b. 1997 - December 23, November 24, October 20, September 17, August 19, July 16, June 11, May 16, April 22, March 24, and February 17.

4. Received January 28, 1998.
 - a. "Material for Approval." DEP Memorandum from Jack Price, dated May 16, 1996 concerning batteries (including attachments); and
 - b. Hard copy of the fax dated January 16, 1997 (concerning batteries).
 5. Received February 2, 1998. Fax concerning batteries, aerosols, and oil filters.
 6. Received February 5. MSDS Sheets for the following:
 - a. Bitumastic No. 300-M - Carboline Co.;
 - b. Lock n' Pop X3237 - Key Tech Corp.;
 - c. National R (11-2000), Adhesive - National Starch & Chemical;
 - d. Polythane Component "B" HCFC - Polythane Systems, Inc.;
 - e. Epoxy Resin Glaze, 3561 part A - General Polymers Corp.;
 - f. Epoxy Resin Glaze, 3561 part B - General Polymers Corp.;
 - g. Stonproof MES Part B - Stonhard Inc.;
 - h. Stonclad GS Part B - Stonhard Inc.; and
 - i. Primer Stonset Part B - Stonhard Inc.
 7. Received February 9, 1998. Fax requesting status.
-

Due to the uniqueness of your facility's operation, the Department has been flexible with regard to the procedures for obtaining modifications to your permit. The Department will not require a modification fee to process your request to modify your facility operations to include the above-referenced materials. However, future modifications will require a processing fee. Additional information is needed to process your request. Please provide the following information:

1. Cement Kiln Dust analyses. Please provide the pH for the cement kiln dust leachate for each of the analyses listed in Item #3, above.
2. Batteries. The information received January 28, 1998 (see Item #4, above) does not adequately address the management of batteries at the facility. Since the May 16, 1996 memorandum is not an official Department policy, and the 1994-1995 "Draft Position Paper" may not represent the Department's position, this information should not be interpreted as authorizing the management of batteries at your facility. Sections 403.7192(3)(a) and (b), Florida Statutes (1996), require that,

"After January 1, 1994, a person may not knowingly place in a mixed solid waste stream a dry cell battery that uses a mercuric oxide electrode or a product containing such a battery,...

Eighteen months after the effective date of this subsection, or October 1, 1995, whichever is later, a person may not knowingly place in a mixed solid waste stream a rechargeable battery, or a product containing such a rechargeable battery,..."

(Comment #2, cont'd)

Since the prohibition is for rechargeable batteries and batteries which contain mercuric oxide electrodes, other batteries may be managed by the facility with the appropriate Department-approved permit modification. Please provide specific operational procedures for managing the batteries at the facility. These procedures must include, at a minimum, procedures for determining if the batteries are rechargeable or contain mercuric oxide electrodes ("unacceptable"), storage and disposal procedures for unacceptable and acceptable batteries, and recordkeeping. The management of unacceptable batteries (i.e. rechargeable and mercuric oxide electrode) may be required to comply with the other DEP Rules and Universal Waste Management Standards in 40 CFR 273.

3. Aerosols and Oil Filters. The information submitted in Item #5, above, is insufficient. Please provide detailed operational procedures for the management of these materials.

a. **Aerosols.** Will the materials be received as part of mixed loads or as separate loads? Will the cans be mixed with the other solid wastes?

b. **Oil Filters.** How/where will the filters be kept separate from the other solid wastes which are being disposed in Florida? How many filters will be accumulated prior to shipping offsite for disposal, i.e. what is the maximum quantity of filters that may be onsite?

4. Additional materials requested (see Items #1 and #6, above.)

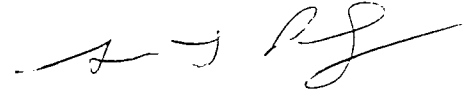
a. The nature of the wastes is unclear. It is not clear if the wastes are packaged finished goods, off-specification chemicals, spent chemicals, or other materials. The information in Item #5 indicates that all materials are virgin products. Although MSDS sheets may be acceptable to describe virgin products, some of the MSDS sheets provided do not include information relative to pH (e.g. Items #1.a., 1.c., 1.d., etc.), the flashpoint data may not be based on appropriate test methods for hazardous waste determination, or flashpoint information is not provided (e.g. Items #1.c., 1.d., etc.). In general, please provide a description of the process which generates the waste, and a description of the waste (including the packaging). Please be advised that since the generator has determined that these materials are "waste," an adequate hazardous waste characterization must have been performed for each of these materials.

b. Please provide legible copies of the following MSDS Sheets:

- 1) Ucare Polymers KR-125, 400, 30M - Amerchol Corp.;
- 2) Epoxy Resin Glaze, 3561 part A - General Polymers Corp. (left edge is cut off on copy provided); and
- 3) Epoxy Resin Glaze, 3561 part B - General Polymers Corp. (left edge is cut off on copy provided).

You are requested to submit your response to this letter as one complete package, within 30 days of the date of this letter. In order to ensure that the information submitted is not misplaced or mis-filed, please include a letter of transmittal or cover letter with your submittal (and all future submittals). If there are points which must be discussed and resolved, please contact me at (813) 744-6100 ext. 386.

Sincerely,



Susan J. Pelz, P.E.
Solid Waste Section
Southwest District

sjp

cc: Jack Price, FDEP TAL-RCRA
Beth Knauss, FDEP Tampa-RCRA
Robert Butera, P.E., FDEP Tampa-Solid Waste



Jim Clark, CHMM

Clark Environmental, Inc.

755 Prairie Industrial Parkway
Mulberry, Florida 33860
813-425-4884 • Fax: 813-425-4642

Clark Environmental, Inc.

~~941~~ 425-4884 • FAX 941-425-4642

863



Beth Clark
President

Corporate Headquarters
755 Prairie Industrial Parkway
Mulberry, FL 33860



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

March 20, 1998

Mrs. Elizabeth Clark
Clark Environmental, Inc.
755 Prairie Industrial Parkway
Mulberry, Florida 33860

Re: FLD 984 206 003

Dear Mrs. Clark:

Thank you for your assistance during the RCRA compliance inspection conducted on January 9, 1998.

Enclosed is the inspection report generated from this visit. Based upon the information gathered from this inspection, Clark Environmental, Inc. was found to be in compliance with applicable RCRA and State regulations governing hazardous waste, petroleum contact water, used oil, and used oil filters.

Issues regarding potential violations of your solid waste volume reduction/materials processing permit have been referred to the Department's Solid Waste Section for compliance evaluation.

If you have any questions, or if I can be of further assistance to you, please contact me at (813) 744-6100, extension 399.

Sincerely,

Gilbert T. Dembeck
Environmental Specialist III
Division of Waste Management

GTD/gtd

Enclosure

cc: Panduranga Ojili, BWP&R
Susan Pelz, Solid Waste Section

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Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Clark Environmental, Inc. EPA ID # FLD 984 206 003

STREET ADDRESS 755 Prairie Industrial Parkway, Mulberry, Florida 33860

MAILING ADDRESS Same

COUNTY Polk PHONE 941/425-4884 DATE 1/9/98 TIME 12:30 P.M..

NOTIFIED AS: ☐ N/A

CURRENT STATUS:

- ☒ Non Handler
☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☐ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☐ Used Oil:

- ☒ Non Handler
☐ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☐ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
Unit Type(s):
☐ Exempt Treatment Facility
☐ Used Oil: Transfer Facility

2. APPLICABLE REGULATIONS:

- | | | | |
|---------------------------------------|--------------------------------------|--------------------------------------|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL(s):

Elizabeth Clark

4. INSPECTION PARTICIPANTS:

Elizabeth Clark

Jim Clark

Robert Sellers, FDEP

Gilbert T. Dembeck, FDEP

5. LATITUDE/LONGITUDE 27° 44' 17" 81° 59' 39"

6. SIC Code: 7389

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT #: N/A ISSUE DATE: EXP. DATE:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

9. PROCESS DESCRIPTION:

Clark Environmental, Inc. (CEI) is a permitted solid waste volume reduction/materials processing facility. CEI is also registered as a hazardous waste, used oil, and used oil filter transporter under the EPA ID number FLR 000 009 605. CEI's permit does not authorize them to store or process hazardous waste, used oil, or used oil filters. Although the facility is permitted to process petroleum contact water, no processing is done on site.

This inspection was made to verify the status of the permitted facility only, and how waste such as used oil was handled at the facility.

Processing takes place in one of two buildings. Bulk containers of material such as petroleum contaminated soil, oily wastewater, petroleum contaminated wastewater, or industrial wastewater are processed in the northwest building, where free liquids are drained off and pumped through a filter system and collected in a tank trailer. The remaining solids are stabilized with cement kiln dust to make them amenable for landfilling. All processing takes place within a secondary containment system and, while being filled the tank trailer is stored within secondary containment.

Processing of drummed material takes place in the central building. This building has a containment area where petroleum contaminated soil, oily wastewater, petroleum contaminated water, and other industrial solid/liquid waste mixtures are processed to separate the liquids from the solids. The liquids are pumped through a filter system and collected in a tank trailer. This tank trailer is also stored within secondary containment system. The remaining solids are stabilized with cement kiln dust to make them amenable for landfilling. Observed in the containment area in addition contaminated soil and other solid debris were used oil filters and aerosol containers. Except for a narrow aisle to the east end of the building, the entire area outside the containment area was nearly full of drums. One group of drums at the southwest end were all closed head type drums. Two of these drums were labeled as "Lube, grease." One drum at the northeast end was labeled "Used Oil."

CEI's permit requires that all waste must be profiled before it can be accepted for processing. Part of the profiling process may include the requirement to provide analytical results if the waste is a potential hazardous waste. Waste profile and confirmatory analytical data for some of the material CEI deems acceptable for processing were reviewed and were found to meet their permit requirements.

Profile information for material accepted at the facility indicate that some material may contain as much as 80% oil/grease. CEI claims that this material is oily waste. Oily wastes is defined in 62-701.200(76), F.A.C. as "those materials which are mixed with used oil and have become separated from that used oil." Likewise 40 CFR 279.10(c) defines materials containing and otherwise contaminated with used oil as material "from which the used oil has been properly drained or removed to the extent possible such that no visible signs of free-flowing oil remain in or on the material." At issue is CEI's responsibilities under 62-710, F.A.C. It appears that the sole responsibility for the determination of what is used oil vs. oily waste rest upon the generator of that material and not upon CEI. In addition CEI maintains that it does not process used oil for recycling, only for disposal, so 62-710, F.A.C. and 40 CFR 279 processor requirements do not apply. CEI maintains that it is allowed to process any oily waste that does not fail TCLP for disposal, regardless of the % oil content. While present regulations do not prohibit such action, it must be stressed that since the state has adopted 40 CFR 279, and specifically 40 CFR 279.81, any used oil or material meeting the definition of used oil when destined for disposal is subjected to a waste determination to verify that it is not hazardous waste.

Likewise it is CEI's position that as long as the used oil filters they process are being disposed of outside of Florida that it does not have to comply with 62-710.850, F.A.C. which prohibits disposal of used oil filters in landfills.

Profile records also indicated that material such as spent parts washer solvent, alkaline and zinc carbon batteries also are deemed acceptable, and processed at the facility for disposal. The facility's permit is very specific as to what materials are acceptable for processing. Used oil, used oil filters, aerosol containers, spent parts washer solvent, alkaline and zinc carbon batteries are not included in the permitted list of materials acceptable for processing at the facility. Acceptability of the above material is being reviewed by the Department's Solid Waste Section.

All petroleum contact water brought into the facility is kept segregated from the petroleum contaminated wastewater and other industrial wastewater separated from the solid waste being processed. This is done by storage in a compartmentalized tank trailer. Both petroleum contact water and wastewater are shipped to Industrial Water Services of Jacksonville for treatment and disposal. TCLP analysis of the wastewater is done on an annual basis to confirm it is non-hazardous. No analysis is required for the petroleum contact water since it is going for product recovery.

10. SUMMARY OF ALLEGED VIOLATIONS:

No hazardous waste, petroleum contact water, used oil, or used oil filter management violations have been determined by this inspection. A determination is to be made by the Department's Solid Waste Section as to what waste CEI may accept for future processing at their facility.

Report prepared by: Gilbert T. Dembeck Date 3/20/98
Gilbert T. Dembeck
Environmental Specialist III

Approved by: Elizabeth Knauss Date 3/20/98
Elizabeth Knauss
Environmental Manager

re: Clark

You may want to add a "Recommendations" section

Clark may not accept any oily waste for processing unless a flash point and TCLP analysis has been performed and the waste is non-hazardous. Clark should check incoming shipments of oily waste to ensure that used oil is not being improperly classified as oily waste by the generator. Clark should reject loads that are not consistent with the waste profile. Waste profiles should not be amended to include more than one waste. Instead, separate profiles should be used for each process waste from each generator.

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of

3. Generator's Name and Mailing Address

Addison Products (Weather King)
7050 OVERLAND RD
ORLANDO, FL. 32810

4. Generator's Phone (407) 292-4400

5. Transporter 1 Company Name

ORANGE INDUSTRIAL

6. US EPA ID Number

FL.D.052.1.045.36

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CLARK ENVIRONMENTAL, INC.
755 PRAIRIE INDUSTRIAL PKWY,
MULBERRY, FL. 33860

10. US EPA ID Number

FL.D.9.842.0.6.0.03

A. Transporter's Phone 407 482 9101

B. Transporter's Phone

C. Facility's Phone

941-425-4884

11. Waste Shipping Name and Description

a. NON-REGULATED INDUSTRIAL WASTE
REFRIGERANT OIL

12. Containers
No. Type

13.
Total
Quantity

14.
Unit
Wt/Vol

001 d.r. 000.55 G

D. Additional Descriptions for Materials Listed Above

3958-DOI

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

OZZIE VARGAS

Signature

[Signature]

Month Day Year

10/24/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Keith Florio

Signature

[Signature]

Month Day Year

10/24/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Barbara Davis

Signature

[Signature]

Month Day Year

10/25/87

Trans 2 Copy

PROFILE DOCUMENT

GENERATOR: WEATHERKING/ADDISON CEI APPROVAL #: 3958-DO1 Digo #45/55
SITE ADDRESS: 7050 OVERLAND RD BROKER: RUST
CITY: ORLANDO STATE: FL ZIP: ADDRESS:
MAILING ADDRESS: SAME CITY: ORLANDO STATE: ZIP:
CITY: STATE: ZIP: TELEPHONE: 407 851 0040
TELEPHONE: 407-292-4400 CONTACT: SIM BENJAMIN CONTACT: PAUL
TYPE OF BUSINESS: REFRIGERATED TRUCK BOXES - MANUFACTURER/SERVICE
PROCESS DESCRIPTION: T & D DRUMMED WASTE REFRIGERANT OIL/WATER
PROPER D.O.T. SHIPPING NAME: NON-REGULATED INDUSTRIAL WASTE

COMPOSITION:

WASTE OIL 50 %
WATER 50 %
Analytical on File @ CEI / Rust
COLOR: BROWN ODOR: oil

1. SINGLE PHASE <input checked="" type="checkbox"/>	BI-LAYERED ()	MULTI-LAYERED ()
2. LIQUID <input checked="" type="checkbox"/>	SEMI-SOLID ()	SOLID ()
3. SOLIDS: <1% 1-5 () 5-10 () 10-20 () 20-30 () >30% ()		
4. BTU/LB: <5000 () 5000-7500 () 7500-9000 () 9000-10500 () >10500 ()		
5. WATER: <1 () 1-5 () 5-10 () 10-20 () 20-50 () >50 ()		
6. CHLORIDES %: 0.1-0.5 () 0.5-1.0 () 1.0-5.0 () 5-10 () 10-20 () >20 ()		
7. FLASH POINT: <70 () 70-100 () 100-140 () 140-200 () >200 ()		
8. PH: 5 () 2-5 () 5-9 () 9-12.5 () >12.5 ()		
9. SPECIFIC GRAVITY: 0.8-0.9 () 0.9-0.99 () 1.0-1.1 () 1.1-1.3 () >1.3 ()		

INDICATE IF THE WASTE CONTAINS ANY OF THE FOLLOWING

1	CONSTITUENT	TC REG. PPM	CALIF. LIST PPM	ACTUAL PPM
D004	ARSENIC	<5	>500	
D005	BARIUM	<100	N/A	
D006	CADMIUM	<1	>100	
D007	CHROMIUM	<5	>500	
D008	LEAD	<5	>500	
D009	MERCURY	<0.2	<0.2	
D010	SELENIUM	<1	>100	
D011	SILVER	<5	N/A	
	COPPER	N/A	N/A	
	NICKEL	N/A	N/A	
	THALLIUM	N/A	N/A	
	ZINC	N/A	N/A	
D012	ENDRIN	<0.02		
D013	LINDANE	<0.4		
D014	METHOXYCHLOR	<10		
D015	TOXAPHENE	<0.5		
D016	2,4 D	<10		
D017	2,4,5,T,PSILVEX	<1.0		
D018	BENZENE	<0.5		
D019	CARBON 1ET.	<0.5		
D020	CHLORDANE	<0.03		
D021	CHLOROBENZENE	<100		

AND THE AMOUNTS. IF NONE PRESENT, WRITE 0 (ZERO).

1	CONSTITUENT	TC REG. PPM	ACTUAL PPM
D022	CHLOROFORM	<6.0	
D023	O-CRESOL	<200	
D024	M-CRESOL	<200	
D025	P-CRESOL	<200	
D026	CRESOL	<200	
D027	1,4 DICHLOROBENZENE	<7.5	
D028	1,2 DICHLOROETHANE	<0.5	
D029	1,1 DICHLOROETHYLENE	<0.7	
D030	2,4 DINITROTOLUENE	<0.13	
D031	HEPTACHLOR	<0.008	
D032	HEXACHLOROBENZENE	<0.13	
D033	HEXACHLOROCYCLODIENE	<0.5	
D034	HEXACHLOROETHANE	<3.0	
D035	METHYL ETHYL KETONE	<200	
D036	NITROBENZENE	<2.0	
D037	PENTACHLOROPHENOL	<100	
D038	PYRIDINE	<3.0	
D039	TETRACHLOROETHYLENE	<0.7	
D040	TRICHLOROETHYLENE	<0.5	
D041	2,4,5 TRICHLOROPHENOL	<400	
D042	2,4,6 TRICHLOROPHENOL	<2.0	
D043	VINYL CHLORIDE	<0.2	
	PCB'S	<50	

ANTICIPATED VOLUME: 3 DRUMS 165 GALLONS 55 LBS PER IX MONTH QUARTER

TYPE CONTAINER: 55 gal SIZE: 55 gal SAMPLE INCLUDED: Y N

ATTACH ALL MSDS AND CURRENT ANALYSIS. I CERTIFY THAT ALL INFORMATION SUBMITTED IS ACCURATE AND THIS MATERIAL IS A NON-RCRA MATERIAL AND/OR WASTE.

GENERATOR'S SIGNATURE

DATE 10-26-95
TOTAL P.01

PHOSLAB

Phone 941-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 941-683-3279

Client: Clark Environmental, Inc.
755 Prairie Industrial Parkway
Mulberry, Florida 33860

Attn.: Mr. Steve Handley
P. O. #:
Project: CEI 142-BC03
Reference:

Sampled By: SH
Sample Date: 09-08-97
Date Received: 09-08-97
Analysis Date: 09-08/09-97
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: CEI 142-BC03

Parameters:	Conc., mg/L	Regulatory Limits, mg/L
Arsenic	<0.01	5.00
Barium	0.93	100.00
Cadmium	<0.01	1.00
Chromium	0.01	5.00
Lead	<0.01	5.00
Mercury	<0.01	0.20
Selenium	<0.10	1.00
Silver	<0.01	5.00


QA OFFICER

FDER QA/QC #870308G


CHEMIST

PHOSLAB

Phone 941-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 941-683-3279

Client: Clark Environmental, Inc.
755 Prairie Industrial Parkway
Mulberry, Florida 33860

Attn: Mr. Steve Handley
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Date Received: 09-08-97
Analysis Date: 09-08/09-97
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311-VOLATILES

Sample ID: CEI 142-BC03

Parameters:	Conc., mg/L	Regulatory Level, mg/L
Benzene	<0.01	0.5
Carbon Tetrachloride	<0.01	0.5
Chlorobenzene	<0.01	100.0
Chloroform	<0.01	6.0
1,2-Dichloroethane	<0.01	0.5
Trichloroethene	<0.01	0.5
Tetrachloroethene	<0.01	0.7
1,4-Dichlorobenzene	<0.01	7.5
1,1-Dichloroethene	<0.01	0.7
Vinyl Chloride	<0.01	0.2

QA OFFICER

FDER QA/QC #870308G


CHEMIST



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

SITE INSPECTION REPORT

OWNER/OPERATOR: Jim Clark and Elizabeth Clark
MAILING ADDRESS: 755 Prairie Industrial Parkway
Mulberry, Fl. 33860
INSPECTION DATE: October 23, 1997

NAME OF SITE: Clark Environmental Material Processing Facility
SITE ADDRESS: (same as above)
CITY: Mulberry
PERMIT NO: 38627-001-SO

REASON FOR VISIT:

- COMPLIANCE INSPECTION X
- PERMITTING INSPECTION
- COMPLAINT INVESTIGATION

PERSONS PRESENT: Susan Pelz, Robert Butera, Richard Tedder (FDEP); Beth Clark (Clark Env.)

SUMMARY REPORT: ¹²⁶ This inspection was a general compliance inspection.

The facility manages non-hazardous industrial wastes, including solids, sludges, and liquids. The facility has two processing buildings: one for drummed wastes and the other for bulk wastes. The operations generally include unloading the materials onto the floor within a containment structure to allow for the gravity separation of the liquids and solids. The process also includes the addition of a "stabilization agent" (e.g. cement kiln dust) to further solidify the sludges and/or liquids. Solid materials are stored and ultimately loaded into roll-off or tractor-trailer vehicles for offsite disposal. Liquids are stored in one (of two) 6000 gallon tanker trucks, and are also ultimately removed for offsite disposal.

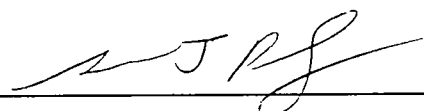
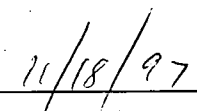
Upon arrival at the site, we noticed an unusual fishy odor. It appeared that this odor was coming from the drum processing building. We could not determine the exact source of the odor, but there was some fish net, (apparently) oil-contaminated booms and pads, and miscellaneous solid waste debris within (west part of) the containment area. The drum processing building seemed to be near capacity for unprocessed drums. We noted that a couple of areas in the containment wall appeared to need repair. We pointed these out to Beth Clark. There were also materials unloaded on the ramp which leads into the containment area. I reminded Beth that materials are not to be stored in this area. She agreed and explained that they had just received some large shipments and the "place was... messy," but that it would be cleaned up shortly. A few of the drums of unprocessed materials appeared to be leaking. We then went around to the cement kiln dust (CKD) storage area. Workers were shoveling cement kiln dust back into the storage bunker. Beth explained that when the CKD was unloaded, a portion of it had inadvertently been unloaded outside of the storage bunker and containment berms. I reminded her that the CKD must not be discharged outside of the containment area (berms and pavement).

We also discussed the loadout procedures for the processed solid materials at the drum processing building. The solid materials are loaded (via front-end loader) into a roll-off (or similar) truck in the same area as the CKD storage area (east part of the building). I expressed some concern about potential spillage in this area. Beth explained that the facility does not load out materials during inclement weather, and that they remove any spillage immediately. I requested that they place a berm along the east side of the paved loadout area to prevent any spillage from discharging to the ground. The areas outside the storage bunkers appeared to be clean and in good repair. Bob also asked if (at a later time) we could schedule an appointment and observe the cleaning of the sump in the drum processing building. Beth indicated that this would be acceptable, and that we should call to arrange the inspection.

We then proceeded to the bulk processing building. Beth pointed out that they had constructed a concrete containment berm along the west side (outside) of the building to alleviate previous concerns that I had expressed regarding seepage through the building's containment walls. A (compartmentalized) tanker truck was located on the north side of the bulk processing building. Beth indicated that this truck was intended for PCW (?) storage and would only be at the site for a short timeframe (1 week?). If liquids are expected to be stored in this truck for extended periods of time, the facility's maximum storage quantities may need to be re-evaluated. Some spillage was observed outside the berm at the north loadout area of the bulk processing building. Since the loadout area is not covered, or bermed on three (of four) sides, we expressed some concern about spillage discharging to the environment from the loadout activities. We suggested that berms be constructed around the loadout area to minimize surface runoff from the loadout area.

RECOMMENDATIONS:

1. Berms should be constructed around each of the loadout areas to minimize potential runoff from spillage of contaminated materials or CKD.

DEP REPRESENTATIVE:
Susan J. Pelz, P.E., Solid Waste Section
Date Mailed to Facility

cc: Beth Knauss, FDEP RCRA



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE
Clark Environmental, Inc.
Ms. Elizabeth G. Clark,
President
755 Prairie Industrial Parkway
Mulberry, Fl. 33860

PERMIT/CERTIFICATION
GMS ID No: 4053P99280
Permit No: 38627-001-SO
Date of Issue: NOV 19 1997
Expiration Date: 08/01/2002
County: Polk
Lat/Long: 27°30'88"N
82°00'02"W
Sec/Town/Rge: 03/30S/23E
Project: Volume Reduction/
Materials Processing
Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-3, 62-4, 62-330, 62-522, 62-550, 62-701, 62-730, and 62-770. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To construct and operate a volume reduction/materials processing facility, referred to as the Clark Environmental Materials Processing Facility, for the processing, consolidation and bulking of non-hazardous solid waste materials, subject to the specific and general conditions attached, located at 755 Prairie Industrial Parkway (off SR 60, west of Mulberry), Bartow, Polk County, Florida. The specific conditions attached are for the construction and operation of:

1. Materials Processing Facility

Replaces Permit Number: S053-199280, Polk County

This permit contains compliance items summarized in Attachment 1 that shall be complied with and submitted to the Department by the dates noted. If compliance dates are not met and submittals are not received by the Department on the dates noted, enforcement action may be initiated to assure compliance with this permit.

PERMITTEE: Clark Environmental Inc.
Ms. Elizabeth G. Clark, President

PERMIT NO: 38627-001-SO
Materials Processing Facility

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of rights, nor any infringement of federal, State, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE: Clark Environmental Inc.
Ms. Elizabeth G. Clark, President

PERMIT NO: 38627-001-SO
Materials Processing Facility

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

(a) Have access to and copy any records that must be kept under conditions of the permit;

(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of noncompliance; and

(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300, Florida Administrative Code, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - (a) Determination of Best Available Control Technology (BACT)
 - (b) Determination of Prevention of Significant Deterioration (PSD)
 - (c) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - (d) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
 - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 1. the date, exact place, and time of sampling or measurements;
 2. the person responsible for performing the sampling or measurements;
 3. the dates analyses were performed;
 4. the person responsible for performing the analyses;
 5. the analytical techniques or methods used;
 6. the results of such analyses.

GENERAL CONDITIONS:

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

16. In the case of an underground injection control permit, the following permit conditions also shall apply:

- (a) All reports or information required by the Department shall be certified as being true, accurate and complete.
- (b) Reports of compliance or noncompliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- (c) Notification of any noncompliance which may endanger health or the environment shall be reported verbally to the Department within 24 hours and again within 72 hours, and a final written report provided within two weeks.
 - 1. The verbal reports shall contain any monitoring or other information which indicate that any contaminant may endanger an underground source of drinking water and any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
 - 2. The written submission shall contain a description of and a discussion of the cause of the noncompliance and, if it has not been corrected, the anticipated time the noncompliance is expected to continue, the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance, and all information required by Rule 62-28.230(4)(b), F.A.C.
- (d) The Department shall be notified at least 180 days before conversion or abandonment of an injection well, unless abandonment within a lesser period of time is necessary to protect waters of the State.

GENERAL CONDITIONS:

17. The following conditions also shall apply to a hazardous waste facility permit.

(a) The following reports shall be submitted to the Department:

1. Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the permittee shall attempt to rectify the discrepancy. If not resolved within 15 days after the waste is received, the permittee shall immediately submit a letter report, including a copy of the manifest, to the Department.
2. Unmanifested waste report. The permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.
3. Biennial report. A biennial report covering facility activities during the previous calendar year shall be submitted by March 1 of each even numbered year pursuant to Chapter 62-730, F.A.C.

(b) Notification of any 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, shall be reported verbally to the Department within 24 hours, and a written report shall be provided within 5 days. The verbal report shall include the name, address, I.D. number, and telephone number of the facility, its owner or operator, the name and quantity of materials involved, the extent of any injuries, an assessment of actual or potential hazards, and the estimated quantity and disposition of recovered material. The written submission shall contain:

1. A description and cause of the noncompliance.
2. If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

(c) Reports of compliance or noncompliance with, or any progress reports on, requirements in any compliance schedule shall be submitted no later than 14 days after each schedule date.

(d) All reports or information required by the Department by a hazardous waste permittee shall be signed by a person authorized to sign a permit application.

SPECIFIC CONDITIONS:

1. **Facility Designation.** This site shall be classified as a materials processing facility for the processing of **non-hazardous** materials only.

a. **Definitions.** The following terms are defined as follows for the purposes of this permit:

1) "Contamination" or "Contaminated" as defined in F.A.C. 62-770.200(1).

2) "Impervious surface" means a surface which has been constructed to prevent the discharge of contaminants into or onto the soil mantle. Asphalt pavement shall not be considered "impervious" for the purposes of this permit. Concrete which has been sealed by a chemical resistant sealant, and which does not exhibit cracking, spalling, gouges, or other deficiencies, may be considered "impervious" for the purposes of this permit.

3) "Non-hazardous materials" are materials which are **not** included in the definition of hazardous wastes pursuant to Chapter 62-730, F.A.C., or 40 CFR 261.3, and also do not exhibit the characteristics of hazardous waste listed in 40 CFR 261, Subpart C.

4) "Petroleum contaminated soil" as defined F.A.C. 62-775.200(9).

5) "Petroleum contaminated water" means water which has been contaminated, as defined above in Specific Condition #1.a(1), exclusively by petroleum products as defined in Section 376.301(21), Florida Statutes (1995), in quantities which may result in a violation of Chapter 62-3, F.A.C., water quality standards.

6) "Processing" means separating and consolidating the materials received based on physical characteristics, and includes bulking and consolidation of materials from small containers into larger containers, and separation of liquids and solids. "Processing" also includes treatment, such as the stabilization of materials by the addition of stabilization agents, only if the treatment, stabilization and/or solidification is performed in accordance with the requirements of this permit, and the resulting material is non-hazardous, as defined in Specific Condition #1.a(3), above.

SPECIFIC CONDITIONS:

(Specific Condition #1.a., cont'd)

7) "Stabilization Agents" are limited to non-hazardous (as defined in Specific Condition #1.a(3), above) materials such as cement kiln dust, flyash, lime, or other chemical reagents whose addition may alter the chemical characteristics of the materials. For the purposes of this permit, "oil-dri", vermiculite, clay absorbents, clean soil, and other materials which may change the physical characteristics (e.g. solid/liquid state), but not the chemical characteristics, of the materials are not considered to be "stabilization agents."

b. The materials which are permitted to be accepted, processed, stored or otherwise managed at the facility are the non-hazardous materials identified below:

- 1) Petroleum contaminated soil.
- 2) Petroleum contaminated sorbent materials (e.g. pads, booms, etc.), and personal protective equipment (PPE).
- 3) Petroleum tank bottom sludges from petroleum storage tank systems regulated pursuant to Chapters 62-761 and 62-762, F.A.C.
- 4) Petroleum contaminated water as defined in this permit, Specific Condition #1.a(5), above.
- 5) Petroleum contact water (PCW) as defined in 62-740.030(1), F.A.C.
- 6) Petroleum contaminated sediments, sludges and liquids which originate from oil/water separators at residential car washes, rollover car washes, and tunnel car washes as defined in 62-660.803(3), F.A.C.
- 7) Soils and liquids, contaminated by virgin, non-hazardous materials, which have originated from accidental spills.
- 8) Investigation-derived soil and water waste from sites contaminated by dry-cleaning solvents as defined in Chapter 376.301(8) and (9), F.S. (1995) which do not fail TCLP and have concentrations of tetrachloroethylene of less than 12 mg/kg for solids or 56 ug/l for wastewaters.
- 9) Non-petroleum contaminated industrial wastewaters, liquids, solids, semi-solids, and sludges on a case-by-case basis, subject to prior Department approval.
- 10) Anti-freeze.
- 11) Latex paint and paint sludges.

SPECIFIC CONDITIONS:

(Specific Condition #1.b., cont'd)

12) Inks and ink sludges.

13) Empty containers which previously contained materials listed in this Specific Condition (#1.b).

c. Unless specifically stated otherwise in this permit, the materials listed in Specific Condition #1.b., above, may be accepted, processed, stored and managed only if the permittee performs, or requires the generator to perform, the analyses listed in **Attachment 3** of this permit, at a minimum. If the generator performs the sampling and analyses, copies of the results shall be retained by the permittee in accordance with the recordkeeping requirements of this permit. Notwithstanding the sampling and analyses conducted pursuant to **Attachment 3**, the permittee shall ensure that only non-hazardous materials as defined in Specific Condition #1.a(3), above, are accepted, processed, stored or otherwise managed at this facility.

d. Materials **not** specifically listed or described in Specific Condition #1.b., above, may **only** be managed at the facility on a case-by-case basis with prior approval from the Department.

e. This permit **does not** specifically authorize the acceptance, processing, storage or other management of materials identified in Chapters 62-710 (used oil rule), and 62-737 (mercury containing device rule), F.A.C. The management of these materials may require a separate Department permit.

f. This permit **does not** authorize the management of household hazardous wastes (described in 40 CFR 261.4), or hazardous wastes generated by conditionally exempt hazardous waste generators regulated under 40 CFR 261.5 (CESQG's).

g. This facility shall be constructed and operated in accordance with all applicable requirements of Chapters 62-3, 62-4, 62-330, 62-520, 62-522, 62-550, 62-701, and 62-770, Florida Administrative Code (F.A.C.) and all applicable requirements of all Department Rules.

2. **Permit Application Documentation.** This permit is valid for operation of the materials processing facility and related facilities in accordance with the reports, plans and other information, submitted by **DRG-Geologic and Environmental Services and Ruby Consulting Services, Inc.** as follows:

a. Solid Waste Management Volume Reduction Facility Permit Application Submittal, dated January 11, 1996 (received January 26, 1996);

b. Additional information (including revised pages) dated June 24, 1996 (received June 28, 1996);

SPECIFIC CONDITIONS:

(Specific Condition #2, cont'd)

- c. Additional information dated December 20, 1996 (received December 24, 1996);
- d. Additional information dated February 20, 1997 (received February 21, 1997);
- e. "Groundwater Monitoring Plan," dated May 4, 1995, received as Appendix F, of reference #2.a., above, dated January 11, 1996 (received January 26, 1996), including revisions;
- f. Additional information concerning groundwater monitoring, dated July 22, 1996 (received July 23, 1996);
- g. Plan Sheets, Engineering Drawings Volume Reduction Facility Permit,... signed and sealed by Momtaz Al-Barq, P.E., on January 11, 1996, (received January 26, 1996) including:
 - 1) Sheet 1 of 3, Cover Sheet;
 - 2) Sheet 2 of 3, Site Plan/Aerial Photograph; and
 - 3) Sheet 3 of 3, Floor Plans and Details;
- h. Sheet 1 of 1, Drum and Bulk Processing Building Cross-Sections, signed and sealed by Momtaz Al-Barq, P.E., on October 15, 1996 (received December 24, 1996);
- i. Additional information received (via fax) September 24, 1997;
- j. and in accordance with all applicable requirements of Department rules.

3. Permit Modifications.

- a. Any activities not previously approved as part of this permit shall require a separate Department permit unless the Department determines a permit modification to be more appropriate. Permits shall be modified in accordance with the requirements of 62-4.080, F.A.C. A modification which is reasonably expected to lead to substantially different environmental impacts which require a detailed review by the Department is considered a substantial modification.
- b. Subject to the requirements of Specific Conditions #6.b. and 7.d(3), below, the operations of this facility may alter the chemical characteristics of the solid or semi-solid materials received, processed, stored or otherwise managed by the addition of stabilization agents, or other methods.

4. Permit Renewal. No later than one hundred eighty (180) days before the expiration of the Department Permit, the permittee shall apply for a renewal of a permit on forms and in a manner prescribed by the Department, in order to assure conformance with all applicable Department rules.

SPECIFIC CONDITIONS:

5. **Prohibitions.** The prohibitions of F.A.C. 62-701.300 shall not be violated.
6. **Facility Operation Requirements.**
- a. The permittee shall operate this facility in accordance with 62-701.700, F.A.C., the **Operations Plan**, and other operational information included in the documents listed in Specific Condition #2, above, and any other applicable requirements.
 - b. All processed materials shall be transferred to, or disposed of at, an appropriately permitted disposal or treatment facility, such as those listed on Page 12 in the **Engineering Report, Part D** as referenced in Specific Condition #2.a., above. The permittee shall not transfer any material, processed or unprocessed, for treatment or disposal, to a facility not specifically approved for the disposal or treatment of such materials. The permittee shall maintain on-site, and provide to the Department upon request, copies of the disposal and treatment facilities' permits which demonstrate that each disposal and treatment facility is authorized to receive the specific types of wastes which are transferred to the disposal or treatment facility from this materials processing facility.
 - c. Non-petroleum contaminated materials shall be pre-approved by the intended disposal facility prior to acceptance at this materials processing facility.
 - d. In the event that the processing equipment becomes inoperable, the permittee shall complete repairs, or provide reserve equipment, within **one week** of discovery of the equipment failure. In the event that sufficient reserve equipment is not available within one week of the equipment failure, and the facility has reached its permitted storage capacity, the facility shall not accept additional waste materials until sufficient equipment is operating at the site.
 - e. Incompatible materials shall not be combined during receipt, storage or processing at the facility.
 - f. The liquid filtering systems shall be cleaned at least once daily, or more frequently if liquids do not effectively flow into the sumps.
7. **Monitoring of Waste.**
- a. **Hazardous Waste or Hazardous Substances.**
 - 1) This permit does not authorize the acceptance, processing or storage of any hazardous waste or any hazardous substance at this site. Hazardous wastes are those defined in Chapter 62-730, F.A.C. Hazardous substances are those defined in Section 403.703, Florida Statutes or in any other applicable state or federal law or administrative rule.

SPECIFIC CONDITIONS:

(Specific Condition #7.a., cont'd)

2) In the event that hazardous waste, or materials which do not comply with the definition in Specific Condition #1.a(3), are received at the facility, the owner or operator shall notify the Department's Hazardous Waste and Solid Waste sections **by the end of the next business day**. These materials shall be stored in an area of the drum processing building separate from the solid waste storage and processing areas. Every effort shall be made to determine the origin of the waste, and the waste shall be characterized and disposed of in accordance with applicable federal, state and local regulations.

3) The owner or operator shall ensure that the materials accepted at the site are non-hazardous materials as described in **Specific Condition #1**.

b. Waste Characterization.

1) "Generator's knowledge" shall not be the sole basis for acceptance of the representation of the material as non-hazardous.

2) MSDS sheets may be acceptable for determining the character of the waste for virgin (unused) materials.

c. Waste Acceptance.

1) Materials shall be accepted in accordance with the **Operations Plan**, other information listed in Specific Condition #2, above, and the conditions of this permit.

2) Prior to acceptance of materials at the facility, the owner or operator shall obtain from the generator a signed Profile Document and laboratory analytical results (MSDS sheets may be accepted for virgin, unused materials) which demonstrate that the materials are non-hazardous as described in Specific Condition #1.a., above.

3) The permittee shall perform, or shall require the generator to perform, the minimum sampling and analysis, required by **Attachment 3** of this permit. Records which correlate and track the samples taken, analytical results, and waste shipments (received and disposed) shall be maintained at the facility, and shall be provided to the Department upon request.

4) Prior to acceptance at this facility, industrial wastewaters shall be tested in accordance with **Attachment 3** of this permit, and shall be tested for parameters of concern based on the particular waste stream as required by the intended disposal facility.

SPECIFIC CONDITIONS:

(Specific Condition #7.c., cont'd)

5) In the event that materials which are received do not correlate with the associated Profile Document, a description of the discrepancy and actions taken shall be recorded. A summary of these incidents shall be provided to the Department upon request.

6) Stabilization Agents.

a) At a minimum monthly, the permittee shall perform, or require the supplier to provide to the permittee, TCLP 8 RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Ag, Se) EPA Method 1311 analyses, for each batch/load/lot of each type of stabilization agent which is received at the facility. These analyses shall demonstrate that each stabilization agent is non-hazardous, as defined in Specific Condition #1.a(3), above. The sampling and analyses required by this Specific Condition shall be conducted more frequently if the character of the stabilization agent or the process which produces the stabilization agent changes.

b) Since the stabilization agents may be waste materials from non-specific sources, and the composition may vary, these analyses shall be required for each batch/load/lot received at this facility for a time sufficient to demonstrate that the stabilization agents have a uniform composition and are consistently non-hazardous. After a sufficient demonstration, the permittee may request modification of this permit, to reduce this testing requirement. This request may be made after a minimum of one year (from the date of permit issuance) demonstration period.

c) These records shall be maintained on-site, and copies shall be provided to the Department upon request.

7) In the event that storage of the contaminated materials at the generator's site presents an unreasonable risk to public health and safety or the environment, e.g. on highway right-of-way, the permittee may accept petroleum contaminated materials prior to receipt of the analytical results required by **Attachment 3** of this permit in accordance with the following:

a) The Department shall be notified **no later than the start of next business day** after materials are received at the facility.

SPECIFIC CONDITIONS:

(Specific Condition #7.c(7), cont'd)

b) In the event that these materials are hazardous wastes or hazardous substances, the Emergency Response on-Scene Coordinator must authorize the storage of the materials at the Clark Environmental processing facility. The permittee shall notify the Department's Solid Waste Section in writing (Fax #813-744-6125) **by the next business day**, that these materials are stored at the Clark Environmental processing facility.

c) These materials shall be stored separately from other materials at the facility, inside the processing buildings or in covered containers.

d) **No later than the end of the next business day** after receipt of these materials at the facility the permittee shall perform the sampling required by **Attachment 3** of this permit.

e) These materials shall not be processed with other materials until analytical results have been received. The analytical results must demonstrate that the materials are acceptable for management at this facility in accordance with Specific Condition #1, above.

d. Waste Disposal.

1) The permittee shall ensure that the materials which are disposed have been adequately characterized to meet the intended disposal facilities' acceptance criteria.

2) Unless specifically noted otherwise in this permit, or otherwise approved by the Department, processed solids shall be disposed of in accordance with Specific Condition #6.b., above, and processed wastewaters shall be disposed of at a wastewater treatment (or pre-treatment) facility permitted by the Department to receive the types of wastes listed in Specific Condition #1.

8. Storage of Materials.

a. The **maximum quantity** of material stored at the facility shall be in accordance with **Attachment 2** of this permit.

b. Unprocessed liquids shall be stored inside the processing buildings, within the containment areas. Processed liquids shall be stored in tanks adjacent to the processing buildings, within the secondary containment areas (shown on **Sheet 3 of 3**, reference Specific Condition #2.g., above).

c. Processed solids shall be stored within the containment areas of the processing buildings, or in covered, lined roll-off containers or covered, lined dump trucks, on impervious surfaces.

SPECIFIC CONDITIONS:

(Specific Condition #8, cont'd)

d. Unprocessed solids shall be stored inside the processing buildings, within the containment areas.

e. Used, empty drums which have not been sufficiently decontaminated, shall be covered (i.e. have lids in place) and shall be stored inside the drum processing building. Used, empty drums which have been sufficiently decontaminated, may be stored outside the drum processing building on the covered concrete slab shown on Sheet 3 of 3, reference Specific Condition #2.g., above.

f. Scrap metals which are recovered from the materials shall be stored in covered, lined roll-off containers or in covered areas on impervious surfaces.

9. Materials Processing.

a. All materials shall be processed on impervious surfaces.

b. The owner or operator shall ensure that neither liquids nor solids are discharged outside the containment areas in the processing buildings.

c. During liquid transfer and processing operations, the truck and all associated hoses and equipment shall be located within the secondary containment areas such that spillage outside of the secondary containment does not occur.

d. Solid materials shall not be processed outside the containment of the processing buildings.

e. Equipment which is used to mix materials shall not be stored or operated outside of the containment of the processing buildings unless it has been decontaminated immediately prior to removal. In no event shall residues from the waste materials be discharged to the environment outside the containment of the processing buildings by processing equipment, trucks, or any other means.

f. Rinsate from the decontamination of equipment or drums shall be managed within the containment areas of the buildings.

g. Cement kiln dust and other stabilization agents shall be managed in a manner which minimizes dust and health hazards to facility personnel. Stabilization agents shall be stored in covered containers or shall be covered and stored on impervious surfaces. Stormwater which contacts the stabilization agents shall be managed as leachate.

10. Operation Plan and Operating Record. A copy of the Department-approved permit, Operations Plan, Engineering Report, Employee Training Manual, Contingency Plan, construction reports and record drawings, and supporting information shall be kept at the facility at all times for reference and inspections.

SPECIFIC CONDITIONS:

11. Waste Records.

a. The owner or operator of the materials processing facility shall maintain at the site, and provide to the Department upon request, the following waste records (at a minimum, the most recent three years):

- 1) The amount of material received, stored, processed and disposed. The amount of material shall include: the estimated quantities of drums received (gallons), an estimate of the percentage of solids and liquids in each drum, the estimated quantities of bulk liquids received (gallons), the estimated quantities of bulk solids received (tons), and the estimated quantities of liquids (gallons) and solids (tons) disposed of, and stored onsite.
- 2) The Profile Document (or internal document equivalent), and other waste characterization documentation, for each drum or shipment accepted at the facility.
- 3) The analyses required by **Attachment 3** of this permit.
- 4) In the event that a consistent industrial waste stream is received, documentation which includes the original analytical results, a description of the process which produced the waste, and confirmation by the industrial facility indicating that the process has not changed since the analyses were performed, shall be acceptable as "pre-acceptance analyses" for this permit. These records shall be maintained onsite, and provided to the Department upon request.
- 5) The analyses for all processed materials, if required by the disposal facility, and documentation indicating the acceptance of the material at the disposal or treatment facility for each shipment from this permitted facility.
- 6) Documentation that all analyses performed by the generator or the permittee is in accordance with a Department approved Quality Assurance Plan. Documentation may consist of a title page, dated and signed by the Department's QA Section, and the Plan's Table of Contents.
- 7) Weekly and Monthly facility inspection logs.
- 8) The analyses of the stabilization agents required by Specific Condition #7.c(6), above.

SPECIFIC CONDITIONS:

(Specific Condition #11, cont'd)

b. The following information shall be compiled monthly and a summary submitted to the Department **quarterly**, by **January 15th, April 15th, July 15th and October 15th** of each year:

1) A material balance including the estimated quantities of drums received (gallons), an estimate of the percentage of solids and liquids in each drum received, the estimated quantities of bulk liquids received (gallons), the estimated quantities of bulk solids received (tons), and the estimated quantities of liquids (gallons) and solids (tons) disposed of, and the estimated quantity of liquids, solids and unprocessed drums stored onsite.

2) The disposal or treatment facility name and location for all materials removed from the facility.

12. Drainage Requirements.

a. All areas outside of the containment areas in the processing buildings shall be cleaned at the end of each day's operation, at a minimum, or as needed, to prevent nuisance conditions, hazardous conditions, odor or vector problems.

b. Except within the containment areas in the processing buildings, floors shall be free of standing liquids.

c. Except for discharges to permitted disposal facilities by approved methods, liquids **shall not** be discharged outside of the containment areas in the processing buildings.

d. Liquids which accumulate in the tanker storage secondary containment areas shall be managed as leachate.

e. In the event that liquids do not drain adequately to the sumps, the filtering system shall be cleaned, and other obstructions removed.

13. Water Quality Monitoring Quality Assurance.

a. All field and laboratory work done in connection with the facility's Water Quality Monitoring Plan shall be conducted by a firm possessing a Comprehensive Quality Assurance Plan approved by the Department to meet the requirements of F.A.C. 62-160. The Quality Assurance Plan must specifically address the types of sampling and analytical work that is required by the permit. The Quality Assurance Plan shall be required of all persons performing sampling or analysis, and shall be followed by all persons collecting or analyzing samples related to this permit. Documentation of an approved QAP shall be submitted **annually** to the Department with the groundwater sampling report due **January 15th**. Documentation shall include the completed signature page and the Table of Contents of the approved plan.

SPECIFIC CONDITIONS:

(Specific Condition #13, cont'd)

b. The field testing, sample collection and preservation and laboratory testing, including quality control procedures, shall be in accordance with methods approved by the Department in accordance with F.A.C. 62-4.246 and 62-160. Approved methods published by the Department or as published in Standard Methods, A.S.T.M., or EPA methods shall be used.

14. **Groundwater Monitoring Well Locations.** The Groundwater Monitoring System is designed and constructed in accordance with the Groundwater Monitoring Plan prepared by DRG Geologic & Environmental Consulting Services dated May 4, 1995 and revised in subsequent permit renewal submittals by the permittee, dated June 24, 1996, December 20, 1996 and February 20, 1997. The groundwater monitoring wells are located as per Figure 2, Site Plan dated April 30, 1995, attached.

<u>Well Number</u>	<u>Aquifer</u>	<u>Designation</u>
MW-1	Surficial	Background
MW-2	"	Compliance
MW-3	"	Compliance
MW-4	"	Background
MW-5	"	Compliance
MW-6	"	Information

15. **Groundwater Sampling.** All compliance and background wells listed in Specific Condition 14 above shall be sampled and analyzed **annually** for the groundwater monitoring parameters listed as follows:

<u>Field parameters</u>	<u>Laboratory parameters</u>
Static Water Level	Arsenic
before purging	Barium
pH	Cadmium
Dissolved Oxygen	Chromium
Turbidity	Lead
Temperature	Mercury
	Selenium
	Silver
	The parameters listed in EPA Test Methods 624 and 625

Monitoring well MW-6 shall be measured for static water levels only.

All samples shall be collected **unfiltered**. Additional samples, wells, and parameters may be required based upon subsequent analysis.

SPECIFIC CONDITIONS:

16. Groundwater Monitoring Well Construction. Any new wells constructed must be approved by the Department through permit modification. The following information shall be submitted to the Department by **within 90 days** of well completion:

a. Documentation of the following for each well installed:

Well Identification	Boring (Lithology) Log
Aquifer monitored	Total depth of well
Screen type and slot size	Casing diameter
Screen length	Casing type and length
Screen diameter	SWFWMD well construction permit Nos.
Well seal and filter pack type and thickness	

b. A surveyed drawing shall be submitted showing the location of the new monitoring well(s), horizontally located in degrees, minutes and seconds of latitude and longitude, and the elevation of the top of the well casing and ground surface by the well casing to the nearest 0.01 foot, National Geodetic Vertical Datum.

17. Well Abandonment. All wells not a part of the approved Water Quality Monitoring Plan are to be plugged and abandoned in accordance with F.A.C. 62-532.440, and the Southwest Florida Water Management District (SWFWMD). Documentation of abandonment shall include a map showing well locations and SWFWMD abandonment records. The permittee shall submit a written report to the Department providing verification of the well abandonment **within 30 days of abandonment**. A written request for exemption to the abandonment of a well must be submitted to the Department's Solid Waste Section for approval. The on-site water well shall be abandoned by **December 1, 1997**, and documentation of abandonment submitted by **January 1, 1998**.

18. Assessment Monitoring. If at any time monitoring parameters are detected at concentrations significantly above background water quality, or exceed the Department's water quality standards or criteria at the edge of the zone of discharge, the permittee has 15 days from receipt of the sampling results to resample the monitor well(s) to verify the original analysis. Should the permittee choose not to resample, the Department will consider the water quality analysis representative of current groundwater conditions at the facility, and assessment or corrective action shall be initiated.

19. Water Quality Reporting Requirements. All ground water monitoring analyses shall be reported on the Department Form 62-522.900(2), Ground Water Monitoring Report (attached). This submittal shall include a ground water flow map of the surficial aquifer at the time of sampling. The permittee shall submit to the Department the results of the water quality by **January 15th**. The results shall be sent to: Solid Waste Section, Department of Environmental Protection, Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318 and to Solid Waste Section, Department of Environmental Protection, 2600 Blainstone Road, Tallahassee, Fl. 32399-2400.

SPECIFIC CONDITIONS:

20. **Groundwater Monitoring Plan Evaluation.** Ninety days before the expiration of the Department Permit, the permittee shall submit an evaluation of the Groundwater Monitoring Plan as described in F.A.C. 62-701.510(9). Any groundwater contamination that may exist, shall be addressed as part of a groundwater investigation for the landfill assessment. The Groundwater Monitoring Plan shall be adequate to monitor any modifications to the existing site operations.
21. **Closure Requirements.** The facility owner or operator shall notify the Department of the facility's closure, no later than 180 days prior to the date when the facility is expected to close, as required by F.A.C. 62-701.700(3)(d). The facility shall be closed in accordance with F.A.C. 62-701.700(3)(d) and the **Closure Plan submitted in the Engineering Report** in the references listed in Specific Condition #2, above.
22. **Financial Assurance.** The owner or operator shall provide financial assurance for the materials processing facility in accordance with F.A.C. 62-701.700(4).
- a. All costs for closure shall be adjusted and submitted annually, by March 1st each year, to: Solid Waste Manager, Solid Waste Section, Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318.
- b. Proof that the financial mechanism has been funded adequately shall be submitted annually to: Financial Coordinator, Solid Waste Section, Department of Environmental Protection, 2600 Blairstone Road, Tallahassee, Fl. 32399-2400.
23. **Facility Maintenance and Repair.**
- a. The site shall be properly maintained including building maintenance, maintenance of processing equipment, containment systems, impervious surfaces and drainage systems.
- b. In the event of damage to any portion of the site facilities, failure of any portion of the associated systems, any spill outside of the containment areas which discharges to the environment, or a fire or explosion at the facility, the permittee shall immediately (within 24 hours) notify the Department of Environmental Protection explaining such occurrence and remedial measures to be taken and time needed for repairs or remediation. Written detailed notification shall be submitted to the Department within seven (7) days following the occurrence.
- c. In the event that the sealant on the concrete containment structures, sump, ramps, or other facility structures becomes damaged, gouged, cracked, spalled, cut, or does not provide a consistently sealed surface, the areas shall be repaired. The Department shall be notified if the containment has become compromised.

PERMITTEE: Clark Environmental Inc.
Ms. Elizabeth G. Clark, President

PERMIT NO: 38627-001-SO
Materials Processing Facility

SPECIFIC CONDITIONS:

24. **Control of Nuisance Conditions.** The owner or operator shall be responsible for the control of odors and fugitive particulates arising from this operation. Such control shall minimize the creation of nuisance conditions on adjoining property. Complaints received from the general public, and confirmed by Department personnel upon site inspection, shall constitute a nuisance condition, and the permittee must take immediate corrective action to abate the nuisance. The owner or operator shall control disease vectors so as to protect the public health and welfare.

25. **Stormwater System.** The site shall continue to have a stormwater management system and/or drainage system operated and maintained in accordance with Department or water management district rules, or the conditions for exemption from stormwater management permitting.

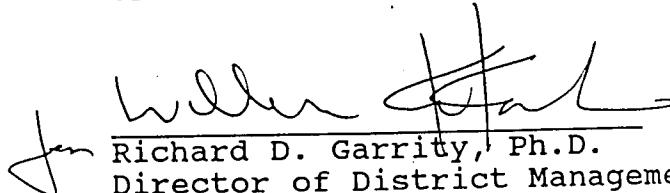
26. **Professional Certification.** Where required by Chapter 471 (P.E.) or Chapter 492 (P.G.), Florida Statutes, applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professional(s) who prepared or approved them.

27. **General Conditions.** The permittee shall be aware of and operate under the "General Conditions". General Conditions are binding upon the permittee and enforceable pursuant to Chapter 403, Florida Statutes.

28. **Permit Acceptance.** By acceptance of this Permit, the Permittee certifies that he/she has read and understands the obligations imposed by the Specific and General Conditions contained herein and also including date of permit expiration and renewal deadlines. It is a violation of this permit for failure to comply with all conditions and deadlines.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

ATTACHMENT 1

SPECIFIC CONDITION	SUBMITTAL DUE DATE	REQUIRED ITEM
4.	180 days prior to permit expiration (February 1, 2002)	Permit Renewal Application
7.a(2)	By end of next business day	Notification of receipt of hazardous waste
11.b.	Quarterly, by January 15th, April 15th, July 15th, and October 15th	Waste quantity reports
13.a.	Annually, by January 15th	Documentation of approved QAP
15.	Annually	Sample groundwater monitoring wells
17.	December 1, 1997	Abandon on-site water supply well
17.	January 1, 1998	Submit documentation of well abandonment
19.	Annually, by January 15th	Submit groundwater monitoring results
20.	90 days prior to permit expiration	Submit groundwater monitoring plan evaluation
21.	180 days prior to date of final material acceptance	Closure notification.
22.	Annually, by March 1st	Financial assurance cost estimates
23.b.	Within 24 hours of occurrence	Notification of system failure or spill or discharge

ATTACHMENT 2

<u>Container Type</u>	<u>Max. Quantity</u>	<u>Storage Location</u>
Unprocessed Drums (includes liquids and solids)	357 ea. (117 tons)	Inside drum processing bldg.
Processed Liquids	12,000 gallons	2 - 5000 gallon tanker trucks inside containment and 2 - 1000 gallon sumps
Unprocessed Bulk Solids	212 CY (297 tons)	Inside bulk processing bldg.
Processed Solids (total)	419 CY (586 tons)	Inside bulk processing and drum processing buildings
Empty (used) Drums	300 ea.	Stored on covered concrete pad outside or inside drum processing building warehouse
Scrap Metal	10 CY	Lined, covered roll-off or covered impervious area near bulk processing building
<hr/>		
Total solids	1000 tons	Inside the containment areas of the processing buildings
Total liquids	12,000 gallons	Tankers within containment areas and sumps.

Derived from information included in Part D, Engineering Report, page 17,
and Appendix C, Engineering Calculations-Operational Capacity, dated January
11, 1996; Financial Assurance information dated December 20, 1996; and
information dated February 20, 1997.

ATTACHMENT 3

Minimum Pre-Acceptance or
Post-Acceptance QC Analyticals

Waste Type	Minimum Analyses	EPA Test Method
Petroleum Contact Water	Generator's Certification	
Used Oil	Field Screening (for halogenated compounds)	
Used Oil filters	None	
Petroleum Contaminated Soil	Virgin Diesel Gasoline- TCLP Benzene Used Oil- TCLP Volatiles TCLP Metals	None 1311 1311 1311
Non-Virgin Processed or Waste Petroleum Contaminated Water (not regulated as PCW)	Volatile organics	601/602
Petroleum Contaminated Water (contaminated with virgin product, not regulated as PCW)	MSDS	
Petroleum Tank Bottom Sludges	Diesel: Tank Certification Gasoline: Flashpoint TCLP Benzene TCLP Lead Used Oil: Flashpoint TCLP Volatiles TCLP Metals	1010 1311 1311 1010 1311 1311

PERMITTEE: Clark Environmental Inc.
Ms. Elizabeth G. Clark, President

PERMIT NO: 38627-001-SO
Materials Processing Facility

ATTACHMENT 3, cont'd

Waste Type	Minimum Analyses	EPA Test Method
Petroleum Contaminated sor bent materials (pads, booms, etc.)	Virgin diesel: none Gasoline: TCLP Benzene Used Oil: TCLP Metals	1311 1311
Liquid and/or Sediments from Car or Truck Wash sump cleanouts	Flashpoint TCLP Metals TCLP Volatiles	1010 1311 1311
Oil/water separator sludges (other than car/truck washes)	TCLP Metals	1311
IDW (soil, water drilling mud) from dry cleaning sites	Volatile Organics	601/602
Any non-RCRA regulated virgin chemical not listed above	MSDS Additional analysis case by case	
Industrial Wastewater, IDW from non-petroleum, non-dry cleaning sites	Analysis determined case by case	
Antifreeze	TCLP Benzene TCLP Lead TCLP PCE TCLP TCE	8240 7421 8240 8240

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
3804 COCONUT PALM DR.
TAMPA, FLORIDA 33619

Protecting Florida and Your Quality of Life



CLARK
ENVIRONMENTAL,
INC.

755 Prairie Industrial Parkway, Mulberry, FL 33860



Date: 1-12-98

Number of pages including cover sheet: _____

To:

Gilbert T. Dembeck

Phone: 744-6100 Ext. 373

Fax phone: 813-744-6125

CC:

From:

Jim Clark

Phone: (941) 425-4884

Fax phone: (941) 425-4642

REMARKS:



Urgent



For your review



Reply ASAP



Please comment

C.O.D.'s on Fla Plating approved waste stream,

Invoice # 7773

CERTIFICATE OF DISPOSAL

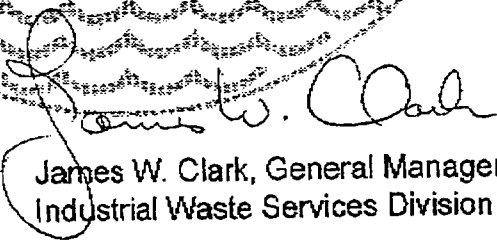
This is to certify that Clark Environmental, Inc. has received ten (10 drums) of Non-Regulated Industrial Waste material from:

GENERATOR: Florida Plating and Machining
1555 Centennial Boulevard
Bartow, FL 33830

ON: March 9, 1997

and that said material has been processed and disposed of in an EPA approved chemical secure landfill as certified by South Carolina Waste Manifest Document 01071 dated March 25, 1997.

January 9, 1998


James W. Clark, General Manager
Industrial Waste Services Division



South Carolina Department of Health and Environmental Control

PLEASE PRINT or TYPE

(Form designed for use on 8 1/2 x 11 inch typewriter)

Form Approved, OMB No. 2050-0039 Expires 9-30-01

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is by State law

3. Generator's Name and Mailing Address

Clark Environmental, Inc.
755 Prairie Industrial Parkway, Mulberry, Florida 33860

4. Generator's Phone (941) 425-4884

5. Transporter 1 Company Name

Clark Environmental, Inc.

6. U.S. EPA ID Number

FLD918421061003

7. Transporter 2 Company Name

8. U.S. EPA ID Number

9. Designated Facility Name and Site Address

Laidlaw Environmental Services of South Carolina, Inc.
Route 1, Box 255
Pinewood, SC 29125

10. U.S. EPA ID Number

SCD070375985

A. State Manifest Document Number

R. State Generator's ID

SAME

C. State Transporter's ID

N/A

D. Transporter's Phone

941-425-4884

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

803-452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

a. Industrial Waste
Non-Regulated12. Containers
No. Type

0,01 D,T

13. Total Quantity

446.00

14. Unit
Nt/Wt

P

15. Waste Number

7777

J. Additional Descriptions for Materials Listed Above

a. P.W.-104831-191001 T

b. - - - - -

15. Special Handling Instructions and Additional Information

24 Hour: 941-425-4884

In #: 216-605

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Jim Clark

Signature

Month Day

03/24/98

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Lloyd Hedges

Signature

Month Day

03/24/98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day

03/24/98

19. Discrepancy Indication Space

a. 446.00 lbs. c. -

b. - lbs. d. -

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18.

Printed/Typed Name

LARRIS

Signature

Month Day

03/24/98

Invoice # 8608

CERTIFICATE OF DISPOSAL

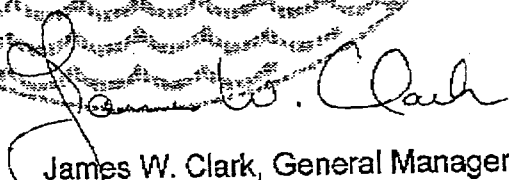
This is to certify that Clark Environmental, Inc. has received eight (8) drums of Non-Regulated Industrial Waste material from:

GENERATOR: Florida Plating and Machining
1555 Centennial Boulevard
Bartow, FL 33830

ON: August 1, 1997

and that said material has been processed and disposed of in an EPA approved chemical secure landfill as certified by South Carolina Waste Manifest Document 01223 dated September 3, 1997.

January 9, 1998


James W. Clark, General Manager
Industrial Waste Services Division

PLEASE PRINT or TYPE

Form designed for use on this (12-plate) typewriter

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is by State law.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

F.L.D.9.0.4.2.0.6.0.0.3.0.1.2.1.3

Manifest Document No.

3. Generator's Name and Mailing Address

Clark Environmental, Inc.
755 Prairie Industrial Parkway, Mulberry, Florida 33860

4. Generator's Phone (941) 425-4884

5. Transporter 1 Company Name

Clark Environmental, Inc.

7. Transporter 2 Company Name

8. Designated Facility Name and Site Address

Laidlaw Environmental Services of South Carolina, Inc.
Route 1, Box 255
Pinewood, SC 29125

S.C.D.0.7.0.3.7.5.2.0.5

A. State Manifest Document Number

B. State Generator's ID

SAME

C. State Transporter's ID

N/A

D. Transporter's Phone

941-425-4884

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

803-452-5003

10. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

Industrial Waste
Non-Regulated12. Containers
No. Type

0,0,1 0,1

13. Total Quantity

44,080

14. Unit
MVR

P

15. Waste Number

212121

16. Waste Number

17. Waste Number

18. Waste Number

19. Waste Number

20. Waste Number

21. Waste Number

22. Waste Number

23. Waste Number

24. Waste Number

25. Waste Number

26. Waste Number

27. Waste Number

28. Waste Number

29. Waste Number

30. Waste Number

31. Waste Number

32. Waste Number

33. Waste Number

34. Waste Number

35. Waste Number

36. Waste Number

37. Waste Number

38. Waste Number

39. Waste Number

40. Waste Number

41. Waste Number

42. Waste Number

43. Waste Number

44. Waste Number

45. Waste Number

46. Waste Number

47. Waste Number

48. Waste Number

49. Waste Number

50. Waste Number

J. Additional Descriptions for Materials Listed Above

P.W.-(0.4.8.3.1.1)-12.1.0.1.1

12.1.0.1.1

15. Special Handling Instructions and Additional Information

24 Hour: 941-425-4884

In F: 220-797

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations or the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Jim Clark

Signature

Jim Clark

Month Day Year

09 02 98

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

Lloyd Hodges

Signature

Lloyd Hodges

Month Day Year

09 02 98

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

09 02 98

19. Discrepancy Indication Space

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest as set forth in Item 10.

Printed/Typed Name

Mr. Justice

Signature

Mr. Justice

Month Day Year

09 02 98

Invoice # 6979

CERTIFICATE OF DISPOSAL

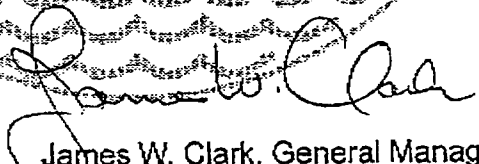
This is to certify that Clark Environmental, Inc. has received eleven (11) drums) of Non-Regulated Industrial Waste material from:

GENERATOR: Florida Plating and Machining
1555 Centennial Boulevard
Bartow, FL 33830

ON: October 19, 1997

and that said material has been processed and disposed of in an EPA approved chemical secure landfill as certified by South Carolina Waste Manifest Document 01271 dated November 6, 1997.

January 9, 1998


James W. Clark, General Manager
Industrial Waste Services Division



03-28-1995 03:27PM FROM CLARK ENVIRONMENTAL
 Clark Environmental, Inc.
 755 Prairie Industrial Parkway
 Mulberry, FL 33860

TO Trans #5

6470921 P.09

OFFICE: (813) 425-4642
 Fax: (813) 425-4642

PROFILE DOCUMENT

Over-pack - 30/24

Trans #20/55gal

GENERATOR: FLORIDA PLATING AND MACHINING, INC.

CEI APPROVAL #: 4993-DO1 Disposal #90/55gal

SITE ADDRESS: 1555 CENTENNIAL BLVD

BROKER: International Environmental Services, Inc.

CITY: BARTOW STATE: FL ZIP: 33830

ADDRESS: 2636 Clubhouse Rd

MAILING ADDRESS: -SAME AS ABOVE-

CITY: Bartow STATE: FL ZIP: 33830

CITY: STATE: ZIP:

TELEPHONE: 647-0822 FAX: 647-0921

TELEPHONE: (813) 533-8868 CONTACT: PATTIE LAWSON

CONTACT: Dave Davenport

TYPE OF BUSINESS: MACHINE SHOP

PROCESS DESCRIPTION: OIL/WATER SEPARATOR

PROPER D.O.T. SHIPPING NAME: Industrial Waste Non-Regulated

COMPOSITION:

Petroleum Sludge 100 %

1. SINGLE PHASE ☒ BI-LAYERED ☐ MULTI-LAYERED ☐2. LIQUID ☐ SEMI-SOLID ☐ SOLID ☐ LIQUID & SOLID ☒3. SOLIDS: <1% 1-5% 5-10% 10-20% ☒ 20-30% >30% ☐

4. HTU/LB: <5000 5000-7500 7500-9000 9000-10500 >10500

5. WATER: <1% 1-5% 5-10% 10-20% 20-50% ☒ >50% ☐

6. CHLORIDES %: 0.1-0.5 0.5-1.0 1.0-5.0 5-10 10-20 >20

7. FLASH POINT: <70 70-100 100-140 140-200 >200 F

8. PH: <2 2-5 5-9 9-12.5 >12.5

9. SPECIFIC GRAVITY: 0.8-0.9 ☒ 0.9-0.99 1.0-1.1 1.1-1.3 >1.3

COLOR: BLACK ODOR: Pkt. Oil

INDICATE IF THE WASTE CONTAINS ANY OF THE FOLLOWING AND THE AMOUNTS. IF NONE PRESENT, WRITE 0 (ZERO).

#	CONSTITUENT	TC REG. PPM	CALIF. LIST PPM	ACTUAL PPM	#	CONSTITUENT	TC REG. PPM	ACTUAL PPM
D004	ARSENIC	0.03 <5	>500		D022	CHLOROFORM	<6.0	
D005	BARIUM	6.72 <100	N/A		D023	O-CRESOL	<200	
D006	CADMIUM	0.17 <1	>100		D024	M-CRESOL	<200	
D007	CHROMIUM	0.28 <5	>500		D025	P-CRESOL	<200	
D008	LEAD	0.04 <5	>500		D026	CRESOL	<200	
D009	MERCURY	0.01 <0.3	<0.2		D027	1,2-DICHLOROBENZENE	<7.5	
D010	SELENIUM	0.01 <1	>100		D028	1,4-DICHLOROETHANE	<0.5	
D011	SILVER	0.04 <5	N/A		D029	1,1-DICHLOROETHYLENE	<0.7	
	COPPER	N/A	N/A		D030	2,4-DINITROBENZENE	<0.13	
	NICKEL	N/A	N/A		D031	HIPTACILOR	<0.008	
	THALLIUM	N/A	N/A		D032	HEXACHLOROBENZENE	<0.13	
	ZINC	N/A	N/A		D033	HEXACHLOROBUTADIENE	<0.5	
D012	ENDRIN	<0.03			D034	HEXACHLOROETHANE	<2.0	
D013	LINDANE	<0.4			D035	METHYL ETHYL KETONE	<200	
D014	METHOXYCHLOR	<10			D036	NITROBENZENE	<2.0	
D015	TOXAPHENE	<0.5			D037	PENTACHLOROPHENOL	<100	
D016	2,4-D	<10			D038	PYRIDINE	<5.0	
D017	2,4,5,T,P SILVEX	<1.0			D039	TETRACHLOROETHYLENE	<0.7	
D018	BENZENE	<0.5			D040	TRICHLOROETHYLENE	<0.5	
D019	CARBON TET.	<0.5			D041	2,4,5-TRICHLOROPHENOL	<400	
D020	CHLORDANE	<0.03			D042	2,4,6-TRICHLOROPHENOL	<2.0	
D021	CHLOROBENZENE	<100			D043	VINYL CHLORIDE	<0.2	
						PCB'S	<30	

ANTICIPATED VOLUME: 4 DRUMS (55 GALLONS ea) LBS PER 1X MONTH QUARTER

TYPE CONTAINER: SIZE: SAMPLES INCLUDED: Y N

ATTACH ALL MSDS AND CURRENT ANALYSIS. I CERTIFY THAT ALL INFORMATION SUBMITTED IS ACCURATE AND THIS MATERIAL IS A NON-RCRA MATERIAL AND/OR WASTE.

GENERATOR'S SIGNATURE

John A. O'Neil
 Florida Plating & Machining

DATE

9/5/95

TOTAL P.09

PHOSLAB

Phone 813-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 813-683-3279

Client: International Environmental & Engineering, Inc.
P. O. Box 5302
Lakeland, Florida 33807-5302

Attn: Mr. L. H. Davanport
P.O. #:
Project: FPM-Bartow
Reference:

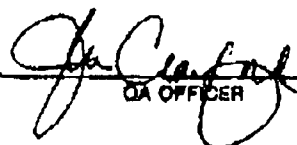
Sampled By: LHD
Sample Date: 08-29-95
Date Received: 08-29-95
Analysis Date: 08-31-95
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS


TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: O/W 1

	<u>Conc., mg/L</u>
Arsenic	0.03
Barium	6.72
Cadmium	0.17
Chromium	0.28
Lead	0.09
Mercury	<0.01
Selenium	<0.01
Silver	0.04


QA OFFICER

PCR 04/0C #5703010


CHEMIST

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

N/A

Manifest
Document No.

2. Page 1
of 1

3. Generator's Name and Mailing Address

FLORIDA PLATING
1555 CENTENNIAL BOULEVARD, BARTOW, FLORIDA 33830

4. Generator's Phone (941) 533-8888

5. Transporter 1 Company Name

CLARK ENVIRONMENTAL, INC.

6. US EPA ID Number

N/A

7. Transporter 2 Company Name

8. US EPA ID Number

N/A

9. Designated Facility Name and Site Address

CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860

10. US EPA ID Number

N/A

A. Transporter's Phone

B. Transporter's Phone

C. Facility's Phone

941-425-4884

11. Waste Shipping Name and Description

a. INDUSTRIAL WASTE
NON-REGULATED

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

DM

011

60005

E

D. Additional Descriptions for Materials Listed Above

6) 4993-D01 (SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

CONTACT: RUSTY - ON SITE
DROP OFF 9 EMPTY DRUMS

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Signature

Month Day Year

11/17/97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

11/17/97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

GENERATOR'S COPY

Please print or type
(Form designed for use on 8 1/2 (12-pitch) typewriter.)

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

N/A

Manifest
Document No.

2. Page 1
of 1

3. Generator's Name and Mailing Address

FLORIDA PLATING
1555 CENTENNIAL BOULEVARD, BARTOW, FLORIDA 33530

4. Generator's Phone (941) 533-8868

5. Transporter 1 Company Name

CLARK ENVIRONMENTAL, INC.

6. US EPA ID Number

N/A

7. Transporter 2 Company Name

8. US EPA ID Number

N/A

9. Designated Facility Name and Site Address

CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860

10. US EPA ID Number

N/A

A. Transporter's Phone

B. Transporter's Phone

C. Facility's Phone

941-425-4884

11. Waste Shipping Name and Description

a. INDUSTRIAL WASTE
NON-REGULATED

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

008

DR

10/16
1000

lb

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

a) 4993-D01 (PETROLEUM SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

CONTACT: RUSTY - ON SITE
DROP OFF 9 EMPTY DRUMS

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Signature

Month Day

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day

GENERATOR'S COPY

12-815-00-Rev

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

N/A

Manifest
Document No.

N/A

2. Page 1

of

3. Generator's Name and Mailing Address

FLORIDA PLATING
1555 CENTENNIAL BOULEVARD, BARTOW, FLORIDA 33820

4. Generator's Phone (941-533-8868)

5. Transporter 1 Company Name

6. US EPA ID Number

N/A

CLARK ENVIRONMENTAL, INC.

7. Transporter 2 Company Name

8. US EPA ID Number

N/A

9. Designated Facility Name and Site Address

10. US EPA ID Number

CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860

N/A

A. Transporter's Phone (941-425-4884)

B. Transporter's Phone

C. Facility's Phone

941-425-4884

11. Waste Shipping Name and Description

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

a. INDUSTRIAL WASTE
NON-REGULATED

007

DM

00385

G

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

a) 4993-D01 (SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

CONTACT:

RUSTY - ON SITE
DROP OFF 5 EMPTY DRUMS

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

RUSTY LAWSON

Signature

Rusty Lawson

Month Day Year

11 17 97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

D. Caswell

Signature

D. Caswell

Month Day Year

10 11 97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Trene Canning

Signature

Trene Canning

Month Day Year

01 11 97

ORIGINAL - RETURN TO GENERATOR

Florida Department of
Environmental Protection

Facsimile Cover Sheet

To: Steve Donovan
Company: Clark Environmental
Phone:
Fax: (407) 398-3444

From: Gilbert T. Dembeck
Company: DEP Hazardous Waste Section
Phone: (813) 744-6100, extension 399
or S.C. 542-6100, extension 399
Fax: (813) 744-6125

Date: January 31, 1995

Pages including this
cover page: 4

Comments: 62-730 revisions per your request.

407 398 3444

8-24-84, 7-5-85, 10-3-85; Formerly 17-30.16; Amended
9-19-86, 10-31-86, 3-31-87, 5-26-87, 6-28-88; Formerly
17-30.160; Amended 1-25-89, 8-13-90, 9-10-91, 10-14-92,
10-7-93; Formerly 17-730.160; Amended _____.

62-730.161 Emergency Identification Numbers.

(1) 40 CFR 262.12(b) requires all generators to obtain an EPA identification number before offering hazardous waste for transport. Under certain special circumstances, the Department processes applications for an emergency identification number [referred to as an emergency EPA/DEP I.D. number]. These special circumstances are:

- (a) Emergency situations such as spills;
- (b) Cleanup of abandoned sites; and
- (c) One-time cleanup of a site that does not normally generate hazardous waste, and will not generate waste in the foreseeable future.

(2) In order to apply for an emergency EPA/DEP I.D. number, the generator of the hazardous waste(s) shall send the Department a completed DEP Form 62-730.900(3) and shall follow the instructions on the form.

(3) For the purpose of this section:

(a) An "emergency situation" shall mean a sudden release of hazardous waste or hazardous materials during transportation or at a product storage facility.

(b) A "one-time cleanup" shall mean removal of hazardous waste where waste has been abandoned on a property; or the property is under bankruptcy proceedings or

an administrative, civil, criminal, or judicial proceeding to compel facility closure; or any other situation which necessitates a one-time cleanup or removal of hazardous waste.

(4) It shall be a violation of this rule for a generator to:

(a) Provide false or incorrect information on DEP Form 62-730.900(3);

(b) Ship hazardous wastes not listed on DEP Form 62-730.900(3) without prior Department approval;

(c) Ship a greater volume of hazardous waste than listed on DEP Form 62-730.900(3) without prior Department approval or without delivering within 24 hours of the shipment, a written explanation of the reason for exceeding the original estimated volume.

(d) Ship hazardous waste either after 60 days from the issue date of the emergency EPA/DEP I.D. number for an emergency EPA/DEP I.D. number which has not been extended, or after the time limit of a 30 day extension granted by the Department.

(e) Fail to send the Department a legible copy of all signed and returned manifests and the land disposal restriction notices and certifications required under 40 CFR 268.7 for the hazardous wastes shipped under the emergency EPA/DEP I.D. number within 45 days of the last shipment.

(5) A generator with an emergency EPA/DEP I.D. number who generates greater than 1000 kg of hazardous waste in a

calendar month, shall submit a biennial report as described in Rule 62-730.160(5), F.A.C.

Specific Authority: 403.704, 403.72, 403.721, F.S.

Law Implemented: 403.704, 403.721, F.S.

History: New

62-730.170 Standards Applicable to Transporters of Hazardous Waste.

(1) The Department adopts by reference 40 CFR Part 263 revised as of July 1, 1993 ~~July 1, -1992~~.

(2) and (2)(a) No change.

~~(2)(b) Evidence of financial responsibility in the amounts specified above shall be submitted to the department within 180 days of the effective date of this paragraph:~~ Evidence of coverage shall include submittal of an originally signed copy of one or more of the following forms adopted in Florida Administrative Code rule Rule 62-730.900(5), F.A.C.:

1. Hazardous Waste Transporter Certificate of Liability Insurance,
2. Hazardous Waste Transporter Liability Endorsement,
3. Hazardous Waste Transporter Liability Surety Bond.

(2)(c) through (2)(g) No change.

(3) Evidence of financial responsibility, updated for the current year, shall be verified annually by the submission of the appropriate DEP Form 62-730.900(5)(a) through (c) ~~form~~ or by the submission of a certificate of insurance. A certificate of insurance shall include a certification by the insurer that the original insurance

EVALUATION - VIOLATION - ENFORCEMENT FORM 1

LDF ☐ TSF ☐ INC ☐ LQG ☐ SQG ☐ TRA ☐ CES ☐ NHR ☒

Date Submitted: 03/11/93 By: KMB Date Entered: / / By:

EPA ID # FLD984206003

County: HENDERSON POLK

Facility Name: CLARK ENVIRONMENTAL, INC.

Street: 755 PRARIE INDUSTRIAL WAY City: MULBERRY

EVALUATION DATA Add: ☒ Update: ☐ Delete: ☐ (☐ = Required Field)

Evaluation Date Mo. 02 Day 11 Year 93 Data Seq # Resp. Agency S Evaluation Type CEI Reason (Option) District Office 40 Inspector KMB

Coverage Areas (EV = Evaluated, NE = Not Evaluated, NA = Not Applicable)

Generators

	EV	NE	NA
GGR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GLB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GPT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GRR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GSC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GSQ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NHD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Transporters

	EV	NE	NA
TGR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TPR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TWD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

TSD's

	E	N	N		E	N	N		E	N	N
DLB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DCL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DSI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DMC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DGS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DTT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DGW	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DWP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DIN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DOT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Compliance Schedule (TSD, GEN, TRA)
FEA EV NE NA CAS EV NE NA

Comments:
(72) 1:

EVALUATION DATA (FOLLOW UPS) Add: Update: Delete: (☐ = Required Field)

Evaluation Date Mo. Day Year Data Seq # Resp. Agency Evaluation Type Reason (Option) District Office Inspector

EVALUATION DATA (FOLLOW UPS) Add: Update: Delete: (☐ = Required Field)

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Comments: