CHRONOLOGICAL ENTRY FORM FOR FOLDERS

Universal Waste and Transit:

FLD 981 932 494 HO29-263213:

Application Correspondence Page 1 Vol 1 (3-c)

NO	DATE	TO	FROM	REFERENCE
1/95	1-3-95	W. Crawford	J. Taylor	Submittal of operating permit renewal
2/95	1-4-95	S. Kastury	B. Crawford	Transmittal of records (1/95)
3/95	2-1-95	B. Crawford	J. Ashwood	Comments on renewal application
4/95	3-30-95	J. Taylor	R. Evans	First Notice of Deficiency
5/95	5-4-95	File	—	List of Attendees - Discussion of 1st NOD
6/95	5-19-95	R. Evans	J. Taylor	Revised Emergency Notifications
7/95	5-22-95	R. Evans	J. Taylor	Response time for 1st NOD
8/95	5-23-95	J. Taylor	B. Crawford	Provide engineering assessment on filter press.
9/95	6-23-95	R. Evans	J. Taylor	Revisions and responses to 1st NOD
10/95	6-26-95	S. Kastury	R. Evans	Transmittal of records (9/95)
11/95	6-26-95	S. Kastury	R. Evans	Summary pages of revised corrections to application
12/95	7-13-95	J. Taylor	R. Evans	2nd Notice of Deficiency
13/95	8-9-95	File	—	List of Attendees - Discussion of 2nd NOD
14/95	8-22-95	R. Evans	J. Taylor	Revisions and responses to 2nd NOD
15/95	8-24-95	S. Kastury	R. Evans	Transmittal of records (14/95)
16/95	9-28-95	File	—	List of Attendees - Discussion of UWT's response to 2nd NOD
17/95	10-30-95	R. Evans	J. Taylor	Letter confirming extension of time to submit additional info.
18/95	10-30-95	B. Crawford	J. Taylor	Use of an aerosol recycling processing unit
19/95	11-9-95	R. Evans	J. Taylor	Revisions and responses to Sept 28, 1995 meeting
20/95	11-15-95	S. Kastury	R. Evans	Transmittal of records (19/95)
21/95	12-4-95	File	—	List of Attendees - Discussion of responses submitted Nov 9, 1995.
22/96	1-4-96	R. Evans	J. Taylor	Letter confirming extension of time to submit additional info.
23/96	1-4-96	K. McCann	D. Mason	Provide amended demonstration for financial assurance.
24/96	1-10-96	R. Evans	J. Taylor	Revisions and responses to Dec 4, 1995 meeting
25/96	1-12-96	S. Kastury	R. Evans	Transmittal of records (24/96)
26/96	1-19-96	J. Taylor	R. Evans	Forms to complete for Facility Change of Name.
27/96	1-29-96	File	—	List of Attendees - Discussion of responses submitted Jan 10, 1996.
28/96	2-14-96	B. Crawford	J. Taylor	Permission to store containers along wall in Bay 2
29/96	2-14-96	R. Evans	J. Taylor	Permission to relocate Waste Profile files
30/96	2-21-96	J. Taylor	R. Evans	File relocation granted
31/96	2-28-96	R. Evans	J. Taylor	Revisions and responses to January 29, 1996 meeting
32/96	3-4-96	S. Kastury	R. Evans	Transmittal of records (31/96)
33/96	3-25-96	R. Evans	J. Taylor	Revisions and responses discussed in telephone conversation
34/96	4-1-96	S. Kastury	R. Evans	Transmittal of records (33/96)
35/96	5-2-96	B. Crawford	T. Maurer	Proposed change of wording to SC Art II.16a
36/96	5-8-96	R. Evans	J. Taylor	Comments on draft permit
37/96	7-22-96	J. Taylor	R. Evans	Required info prior to issuance of operating permit
38/96	8-29-96	R. Evans	J. Taylor	Submitted info in response to letter of 37/96
39/96	9-3-96	R. Evans	J. Taylor	Revised financial assurance specifying new name "City Env."

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

FACSIMILE COVER SHEET

DATE: 9/3/96

TO: Roger Evans - Fax# 744 6125

FROM: John Taylor

OF PAGES: 13
(INCLUDING COVER SHEET)

MESSAGE: Revised Fin. Assur.

CITY

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CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. Fred Wick
FDER
RCRA/Hazardous Waste Regulation Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Wick:

Enclosed is City Management's revised financial assurance package. This submittal reflects a change in closing cost estimates and the test is based on our most recent audited fiscal year ending June 30, 1995. An updated test will be promptly forwarded upon receipt of our fiscal 1996 audited financial statements in mid-September.

If you have any questions regarding this submittal, please do not hesitate to contact me at (313) 567-4700.

Sincerely,

Michael L. Piesko
Chief Financial Officer
City Management Corporation

Enclosure

CITY

Recycled Paper

DEP Form 62-730.900(4)(a)
Form Title HW Facility Financial Test
Effective Date
DEP Application No.

STATE OF FLORIDA
HAZARDOUS WASTE FACILITY LETTER FROM CHIEF FINANCIAL OFFICER TO DEMONSTRATE FINANCIAL ASSURANCE
FOR

☒ Closure ☐ Post-Closure ☐ Corrective Action
[Check Appropriate Box(es)]

The term "Required Action," as used in this document means closure, post-closure care, or corrective action, or any combination of these, which is checked above.

Virginia B. Wetherell, Secretary
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

I am the chief financial officer of City Management Corporation
3400 East Lafayette, Detroit, Michigan 48207
Name and Address of Firm

This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265, as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.).

Fill out the following eight paragraphs regarding facilities and associated cost estimates. If your firm has no facilities that belong in a particular paragraph, write "NONE" in the space indicated. For each facility, include its EPA/DEP or DEP GHS Identification Number, name, address, and current "Required Action" cost estimates. Identify each cost estimate as to whether it is for closure, post-closure or corrective action.

1. This firm is the owner or operator of the following facilities in the State of Florida for which financial assurance for "Required Action" is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265, as adopted by reference in Section 62-730.180, F.A.C. The current "Required Action" cost estimates covered by the test are shown for each facility:

A.	City Environmental Services, Inc. of Florida EPA ID No. FLD 981 932 494 2002 North Orient Road Tampa, Florida 33619	$207,409 (Closure only)

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, as adopted by reference in Section 62-730.180, F.A.C., the "Required Action" of the following facilities in the state of Florida owned or operated by subsidiaries of this firm. The current cost estimates for the "Required Action" so guaranteed are shown for each facility:

NONE

DEP FORM 62-730.900(4)(a)

SEP 03 '96 05:12PM UNIVERSAL WASTE TAMPA P.3

*7.	Net working capital (line 5 minus line 6)	$ 49,812,275
*8.	The sum of net income plus depreciation, depletion, and amortization	$ 37,422,589
*9	Total assets in U.S. (required only if 90 percent of firm's assets are located in the U.S.)	$ 229,913,240

	YES	NO
10. Is line 3 at least $10 million?	X	
[illegible]	X	

7. This firm is the owner, operator or guarantor of the following solid waste management landfill(s) for which financial assurance for "Required Action" is required under 40 CFR Parts 264 Subpart H as [illegible] in Rule 62-701, F.A.C. The current "Required Action" cost estimates, as required by [illegible]

3. In States other than Florida where EPA is administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner, operator or guarantor, is demonstrating financial assurance for the "Required Action" of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current "Required Action" cost estimates covered by such test are shown for each facility:

NONE

4. In States other than Florida where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner, operator or guarantor, is demonstrating financial assurance for the "Required Action" of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current "Required Action" cost estimates covered by such a test are shown for each facility:

A. City Environmental - Kansas City
EPA ID No. MOD 981 706 856
901 Woodswether Road
Kansas City, MO 64101
$288,414 (Closure only)

B. City Environmental - Harper
EPA ID No. MID 054 683 479
1550 Harper Avenue
Detroit, MI 48211
$361,646 (Closure only)

C. City Environmental - Frederick
EPA ID No. MID 980 991 566
1923 Frederick Street
Detroit, MI 48211
$1,413,086 (Closure only)

5. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care or corrective action is <u>not</u> demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265, or equivalent or substantially equivalent state mechanisms. The current "Required Action" cost estimates <u>not</u> covered by such financial assurance are shown for each facility:

NONE

6. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144 and/or Section 62-28.27(2), F.A.C. The current plugging and abandonment cost estimates as required by 40 CFR 144.62 and/or Section 62-28.27(9), F.A.C. are shown for each facility:

NONE

DEP FORM 62-730.900(4)(a)

I hereby certify that the wording of this letter is substantially identical to the wording specified in 40 CFR 264.151(f), as adopted by reference in Section 62-730.180, F.A.C., as such regulations were constituted on the date shown immediately below.

Signature

Michael L. Piesko

Type Name

Chief Financial Officer

Type Title

August 16, 1996

Date

DEP FORM 62-730.900(4)(a)

Coopers &Lybrand

Coopers & Lybrand L.L.P.

a professional services firm

400 Renaissance Center
Detroit, Michigan
48243-1607

telephone (313) 446-7100

facsimile (313) 446-7117

August 27, 1996

To the Stockholder and Management of
City Management Corporation:

We have audited, in accordance with generally accepted auditing standards, the balance sheets of City Management Corporation as of June 30, 1995 and 1994, and the related statements of income, stockholder's equity, and cash flows for the years then ended, and have issued our report thereon dated September 11, 1995.

At your request, we have read the letter and the attachment thereto from the Corporation's chief financial officer, dated August 16, 1996, in support of the Corporation's use of the financial test to demonstrate financial assurance.

We compared the data presented under Alternative I in the attachment to the aforementioned letter, with the financial statements of City Management Corporation for the year ended June 30, 1995.

In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specific data should be adjusted. This report is intended solely for the information and use of the stockholder and management of City Management Corporation and the U.S. Environmental Protection Agency, and should not be used for any other purpose.

Very truly yours,

Coopers + Lybrand L.L.P.

SHE

Attachment

Coopers & Lybrand L.L.P., a registered limited liability partnership, is a member firm of Coopers & Lybrand (International).

CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. R. Davis Layne
Region IV Administrator
U. S. E.P.A.
345 Courtland St., N.E.
Atlanta, GA 30365

Dear Mr. Layne:

Enclosed is City Management's revised financial assurance package. This submittal reflects a change in closing cost estimates and the test is based on our most recent audited fiscal year ending June 30, 1995. An updated test will be promptly forwarded upon receipt of our fiscal 1996 audited financial statements in mid-September.

If you have any questions regarding this submittal, please do not hesitate to contact me at (313) 567-4700.

Sincerely,

Michael L. Piesko
Chief Financial Officer
City Management Corporation

Enclosure

CITY

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CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. R. Davis Layne
Region IV Administrator
USEPA
345 Courtland Street, NE
Atlanta, Georgia 30365

Dear Mr. Layne:

I am the chief financial officer of City Management Corporation, 3400 East Lafayette, Detroit, Michigan 48207. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure cost, as specified in Subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

   NONE

2. This firm guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure of post-closure care so guaranteed are shown for each facility:

   NONE

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

   A. City Environmental Services, Inc. of Florida — $207,409
      EPA ID No. FLD 921 932 494 — (Closure only)
      2002 North Orient Road
      Tampa, Florida 33619

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B.	City Environmental - Kansas City EPA I.D. No. MOD 981 706 856 901 Woodswether Road Kansas City, Missouri 64101	$288,414 (Closure only)
C.	City Environmental - Frederick EPA I.D. No. MID 980 991 566 1923 Frederick Street Detroit, Michigan 48211	$1,413,086 (Closure only)
D.	City Environmental - Harper EPA I.D. No. MID 054 683 479 1550 Harper Avenue Detroit, Michigan 48211	$361,646 (Closure only)

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to the EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H or 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

   NONE

5. This firm is the owner or operator of the following UIC Facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

   NONE

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year for this firm ends on June 30. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended June 30, 1995.

ALTERNATIVE I

1. Sum of current closure and post-closure cost estimate	$ 2,270,555
*2. Total liabilities	150,681,619
*3. Tangible net worth	72,325,324

*4. Net worth	79,231,621
*5. Current assets	79,330,231
*6. Current liabilities	29,517,956
7. Net working capital	49,812,275
*8. The sum of net income plus depreciation, depletion, and amortization	37,422,589
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	N/A

	YES	NO
10. Is line 3 at least $10 million?	X	
11. Is line 3 at least 6 times line 1?	X	
12. Is line 7 at least 6 times line 1?	X	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14	X	
14. Is line 9 at least 6 times line 1?	N/A	
15. Is line 2 divided by line 4 less than 2.0?	X	
16. Is line 8 divided by line 2 greater than 0.1?	X	
17. Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Michael L. Piesko
Chief Financial Officer
City Management Corporation

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

August 23, 1996

D.E.P.
AUG 29 1996
SOUTHWEST DISTRICT
TAMPA

Mr. Roger Evans
Permitting Engineer, Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Re: City Environmental Services, Inc. of Florida (CESF)
FLD 981 932 494
Permit Application H029-263213

Dear Mr. Evans:

Enclosed is the information requested to complete issuance of the CESF hazardous waste permit. The information includes the following items:

1. Name change documentation
2. Revised closure cost estimate and worksheets
3. Financial assurance documents
4. Original proof of publication

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kcp

CITY

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38
96

Department of
Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

08-05-96

JOHN TAYLOR, TECH SERV MGR
CITY ENVIRO SERVICES OF FLORIDA INC
7202 E 8TH AVE
TAMPA FL 33619

RE: Facility ID # FLD981932494
LOC: 2002 N ORIENT RD
TAMPA

Based on information supplied by you, we have processed and accepted at the state level your request for the facility identified with the above ID number to receive the following name change under RCRA:

FROM: UNIVERSAL WASTE & TRANSIT INC

TO: CITY ENVIRO SERVICES OF FLORIDA INC

The status of your facility:

Generator.
Treater.
Storer.
Transporter.

will remain unchanged.

We are advising EPA of this change. Please notify us if there is any further change in your operations which would affect your status.

THIS LETTER IS INTENDED TO NOTIFY YOU OF YOUR EPA ID NUMBER. THIS LETTER IS NOT AN APPROVAL TO TRANSPORT HAZARDOUS WASTE OR OPERATE A HAZARDOUS WASTE TREATMENT, STORAGE OR DISPOSAL FACILITY. PLEASE CONTACT THE DEPARTMENT FOR COMPLETE REQUIREMENTS.

Sincerely,

Michael X. Redig

Michael X. Redig
Environmental Supervisor II
Hazardous Waste Management Section

cc: Dave Gray - EPA/Region IV
DER/Tampa
GMS-ID # 4029P00472

FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State

January 5, 1996

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA
7202 EAST 8TH AVENUE
TAMPA, FL 33619

Subject: **CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA**

REGISTRATION NUMBER: **G96003000068**

This will acknowledge the filing of the above fictitious name registration which was registered on January 3, 1996. This registration gives no rights to ownership of the name.

Each fictitious name registration must be renewed every five years between July 1 and December 31 of the expiration year to maintain registration. Three months prior to the expiration date a statement of renewal will be mailed.

IT IS THE RESPONSIBILITY OF THE BUSINESS TO NOTIFY THIS OFFICE IN WRITING IF THEIR MAILING ADDRESS CHANGES. Whenever corresponding please provide assigned Registration Number.

For information regarding fictitious names on file or to search the record call (904) 488-9000.

Should you have any questions regarding this matter you may contact our office at (904) 487-6058.

Fictitious Name Section
Division of Corporations

Letter No. 496A00000519

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

REQUEST FOR STATUS OR INFORMATION CHANGE FOR HAZARDOUS WASTE GENERATORS, TRANSPORTERS, FACILITIES

This form may be used by hazardous waste generators, transporters, or treatment, storage, or disposal facilities in Florida to request a change in their status. The request is subject to verification by the Department.

BUSINESS EPA/DEP ID NUMBER F L D 9 8 1 9 3 2 4 9 4

Check below if information has changed

BUSINESS NAME (F/K/A Universal Waste & TRansit, Inc.) City Environmental Services, Inc. of Florida [X]

LOCATION ADDRESS 2002 North Orient Road
CITY, STATE Tampa, FLorida 33619

MAILING ADDRESS 7202 East 8th Avenue [X]
CITY, STATE, ZIP Tampa, Florida 33619

CONTACT PERSON John A. Taylor [X]
CONTACT TITLE Technical Services Manager
PHONE NUMBER 813 / 623-5302 [ ]

PREVIOUS STATUS: Large Generator, TSDF, Transporter

IF YOUR CURRENT FACILITY STATUS IS:

X LARGE QUANTITY GENERATOR
___ SMALL QUANTITY GENERATOR (SQG)
___ CONDITIONALLY EXEMPT SQG
X TRANSPORTER
___ HAZARDOUS WASTE FUEL MARKETER/BURNER
___ USED OIL MARKETER/BURNER

X TREATMENT FACILITY
X STORAGE FACILITY
___ DISPOSAL FACILITY
___ MOVED*

PLEASE COMPLETE THE ATTACHED EPA FORM 8700-12 (NOTIFICATION OF REGULATED WASTE ACTIVITY) TO NOTIFY THE DEPARTMENT OF YOUR CURRENT STATUS (FLORIDA ADMINISTRATIVE CODE 17-730.150(5)).

* IF BUSINESS HAS MOVED, SUBMIT FORM 8700-12 FOR THE NEW BUSINESS LOCATION IF THE NEW LOCATION WILL BE INVOLVED IN HAZARDOUS WASTE MANAGEMENT ACTIVITIES.

OUT OF BUSINESS: N/A

_____ Business closed on _____ (Date)

NON-HANDLER STATUS N/A

This status change is requested because:

_____ Business no longer generates, transports, treats, stores, or disposes of hazardous waste.

_____ Waste generated by business has been delisted.

_____ Other; explain: _____

HAZARDOUS WASTE TRANSFER FACILITY STATUS

X Hazardous waste transfer facilities must also notify as a hazardous waste transporter and must comply with FAC 17-730.170 and 17-730.171.

Please attach any documentation or additional explanations and justification to support your request for a status change. You may be asked to submit additional information.

I HEREBY CERTIFY THAT UNDER PENALTY OF LAW I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

John A. Taylor	Technical Services Manager
NAME	TITLE
John A. Taylor	March 29, 1996
SIGNATURE	DATE

Please mail completed forms to :

Hazardous Waste Regulation Section
Florida DEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attachment: EPA Form 8700-12 and instructions

CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. Fred Wick
FDER
RCRA/Hazardous Waste Regulation Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Wick:

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If you have any questions regarding this submittal, please do not hesitate to contact me at (313) 567-4700.

Sincerely,

Michael L. Piesko
Chief Financial Officer
City Management Corporation

Enclosure

CITY

Recycled Paper

DEP Form # 62-730.900(4)(a)
Form Title HW Facility Financial Test
Effective Date
DEP Application No.

STATE OF FLORIDA
HAZARDOUS WASTE FACILITY LETTER FROM CHIEF FINANCIAL OFFICER TO DEMONSTRATE FINANCIAL ASSURANCE
FOR

☒ Closure ☐ Post-Closure ☐ Corrective Action
[Check Appropriate Box(es)]

The term "Required Action," as used in this document means closure, post-closure care, or corrective action, or any combination of these, which is checked above.

Virginia B. Wetherell, Secretary
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

I am the chief financial officer of City Management Corporation

3400 East Lafayette, Detroit, Michigan 48207

Name and Address of Firm

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Fill out the following eight paragraphs regarding facilities and associated cost estimates. If your firm has no facilities that belong in a particular paragraph, write "NONE" in the space indicated. For each facility, include its EPA/DEP or DEP GMS Identification Number, name, address, and current "Required Action" cost estimates. Identify each cost estimate as to whether it is for closure, post-closure or corrective action.

1. This firm is the owner or operator of the following facilities in the State of Florida for which financial assurance for "Required Action" is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265, as adopted by reference in Section 62-730.180, F.A.C. The current "Required Action" cost estimates covered by the test are shown for each facility:

A. Universal Waste & Transit EPA ID No. FLD 981 932 494 2002 North Orient Tampa, FL 33619	$207,409 (Closure only)

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, as adopted by reference in Section 62-730.180, F.A.C., the "Required Action" of the following facilities in the state of Florida owned or operated by subsidiaries of this firm. The current cost estimates for the "Required Action" so guaranteed are shown for each facility:

NONE

3. In States other than Florida where EPA is administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner, operator or guarantor, is demonstrating financial assurance for the "Required Action" of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current "Required Action" cost estimates covered by such test are shown for each facility:

NONE

4. In States other than Florida where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner, operator or guarantor, is demonstrating financial assurance for the "Required Action" of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current "Required Action" cost estimates covered by such a test are shown for each facility:

A. City Environmental - Kansas City
EPA ID No. MOD 981 706 856
901 Woodswether Road
Kansas City, MO 64101
$288,414 (Closure only)

B. City Environmental - Harper
EPA ID No. MID 054 683 479
1550 Harper Avenue
Detroit, MI 48211
$361,646 (Closure only)

C. City Environmental - Frederick
EPA ID No. MID 980 991 566
1923 Frederick Street
Detroit, MI 48211
$1,413,086 (Closure only)

5. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care or corrective action is <u>not</u> demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265, or equivalent or substantially equivalent state mechanisms. The current "Required Action" cost estimates <u>not</u> covered by such financial assurance are shown for each facility:

NONE

6. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144 and/or Section 62-28.27(9), F.A.C. The current plugging and abandonment cost estimates as required by 40 CFR 144.62 and/or Section 62-28.27(9), F.A.C. are shown for each facility:

NONE

7. This firm is the owner, operator or guarantor of the following solid wa... management landfill(s) for which financial assurance for "Required Action" is required under 40 CFR Parts 264 Subpart H as adopted by reference in Rule 62-701, F.A.C. The current "Required Action" cost estimates, as required by Rule 62-701, F.A.C., are shown for each facility:

NONE

8. This firm is the owner, operator or guarantor of the following solid waste facility(ies), other than landfills (i.e. underground storage tank(s), phosphogypsum stack(s), etc.), for which financial assurance for "Required Action" is demonstrated through the use of a financial test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current "Required Action" cost estimates covered by the test are shown for each facility.

NONE

This firm is not required to file a Form 10K with the Securities
(Insert "is required" or "is not required")

and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on June 30 (Month, Day). The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended June 30, 1995 (Date).

Fill in Alternative I if the criteria of paragraph (f)(1)(I) of §§264.143 or 264.145, or of paragraph (e)(1)(I) of §§265.143 or 265.145, as adopted by reference in Section 62-730.180, F.A.C., are used. Fill in Alternative II if the criteria of paragraph (f)(1)(II) of §§264.143 or 264.145, or of paragraph (e)(1)(II) of §§265.143 or 264.145, as adopted by reference in Section 62-730.180, F.A.C., are used.

ALTERNATIVE I

1.	Sum of current "Required Action" cost estimates (total of all cost estimates shown in the eight paragraphs above)	$ 2,270,555
*2.	Total liabilities (If any portion of the "Required Action" cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	$ 150,681,619
*3.	Tangible net worth	$ 72,325,324
*4.	Net worth	$ 79,231,621
*5.	Current assets	$ 79,330,231
*6.	Current liabilities	$ 29,517,956

*7.	Net working capital (line 6 minus line 6)	$ 49,812,275
*8.	The sum of net income plus depreciation, depletion, and amortization	$ 37,422,589
*9	Total assets in U.S. (required only if 90 percent of firm's assets are located in the U.S.)	$ 229,913,240

		YES	NO
10.	Is line 3 at least $10 million?	X	
11.	Is line 3 at least 6 times line 1?	X	
12.	Is line 7 at least 6 times line 1?	X	
13.	Are at least 90 percent of firm's assets located in the U.S.? If not, complete line 14.	X	
14.	Is line 9 at least 6 times line 1?	X	
15.	Is line 2 divided by line 4 less than 2.0?	X	

		YES	NO
16.	Is line 8 divided by line 2 greater than 0.1?	X	
17.	Is line 5 divided by line 6 greater than 1.5?	X	

ALTERNATIVE II

1.	Sum of current "Required Action", cost estimates (total of all cost estimates shown in the eight paragraphs above)	$
2.	Current bond rating of most recent issuance of this firm and name of rating service.	
3.	Date of issuance of bond	
4.	Date of maturity of bond	
*5.	Tangible net worth (if any portion of the "Required Action" cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line)	$
*6.	Total assets in U.S. (required only if less than 90 percent of firm's assets are located in the U.S.)	$

		YES	NO
7.	Is line 5 at least $10 million?		
8.	Is line 5 at least 6 times line 1?		
*9.	Are at least 90 percent of firm's assets located in the U.S.? If not, complete line 10.		
10.	Is line 6 at least 6 times line 1?		

I hereby certify that the wordi. of this letter is substantially identical to t ording specified in 40 CFR 264.151(f), as adopted by reference in Section 62-730.180, F.A.C., as such regulations were constituted on the date shown immediately below.

Signature

Michael L. Piesko

Type Name

Chief Financial Officer

Type Title

August 16, 1996

Date

DEP FORM 62-730.900(4)(a)

Coopers &Lybrand

pers & Lybrand L.L.P.

a professional services firm

400 Renaissance Cen.
Detroit, Michigan
48243-1507

telephone (313) 446-7100

facsimile (313) 446-7117

August 27, 1996

To the Stockholder and Management of
City Management Corporation:

We have audited, in accordance with generally accepted auditing standards, the balance sheets of City Management Corporation as of June 30, 1995 and 1994, and the related statements of income, stockholder's equity, and cash flows for the years then ended, and have issued our report thereon dated September 11, 1995.

At your request, we have read the letter and the attachment thereto from the Corporation's chief financial officer, dated August 16, 1996, in support of the Corporation's use of the financial test to demonstrate financial assurance.

We compared the data presented under Alternative I in the attachment to the aforementioned letter, with the financial statements of City Management Corporation for the year ended June 30, 1995.

In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specific data should be adjusted. This report is intended solely for the information and use of the stockholder and management of City Management Corporation and the U.S. Environmental Protection Agency, and should not be used for any other purpose.

Very truly yours,

Coopers + Lybrand L.L.P.

SHE

Attachment

Coopers & Lybrand L.L.P., a registered limited liability partnership, is a member firm of Coopers & Lybrand (International).

CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. R. Davis Layne
Region IV Administrator
U. S. E.P.A.
345 Courtland St., N.E.
Atlanta, GA 30365

Dear Mr. Layne:

Enclosed is City Management's revised financial assurance package. This submittal reflects a change in closing cost estimates and the test is based on our most recent audited fiscal year ending June 30, 1995. An updated test will be promptly forwarded upon receipt of our fiscal 1996 audited financial statements in mid-September.

If you have any questions regarding this submittal, please do not hesitate to contact me at (313) 567-4700.

Sincerely,

Michael L. Piesko
Chief Financial Officer
City Management Corporation

Enclosure

CITY

Recycled Paper

CITY MANAGEMENT CORPORATION • 3400 EAST LAFAYETTE • DETROIT, MICHIGAN 48207 • (313) 567-4700
FAX: (313) 567-0966

August 16, 1996

Mr. R. Davis Layne
Region IV Administrator
U. S. E.P.A.
345 Courtland St., N.E.
Atlanta, GA 30365

Dear Mr. Layne:

I am the chief financial officer of City Management Corporation, 3400 East Lafayette, Detroit, Michigan 48207. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure cost, as specified in Subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

   NONE

2. This firm guarantees, through the guarantee specified in Subpart H of 40 CFR parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

   NONE

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

A.	Universal Waste & Transit EPA I.D. No. FLD 981 932 494 2002 North Orient Tampa, Florida 33619	$207,409 (Closure only)

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B.	City Environmental - Kansas City EPA I.D. No. MOD 981 706 856 901 Woodswether Road Kansas City, Missouri 64101	$288,414 (Closure only)
C.	City Environmental - Frederick EPA I.D. No. MID 980 991 566 1923 Frederick Street Detroit, Michigan 48211	$1,413,086 (Closure only)
D.	City Environmental - Harper EPA I.D. No. MID 054 683 479 1550 Harper Avenue Detroit, Michigan 48211	$361,646 (Closure only)

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to the EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H or 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

   NONE

5. This firm is the owner or operator of the following UIC Facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

   NONE

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year for this firm ends on June 30. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended June 30, 1995.

ALTERNATIVE I

1. Sum of current closure and post-closure cost estimate	$ 2,270,555
*2. Total liabilities	150,681,619
*3. Tangible net worth	72,325,324

*4. Net worth	79,231,621
*5. Current assets	79,330,231
*6. Current liabilities	29,517,956
7. Net working capital	49,812,275
*8. The sum of net income plus depreciation, depletion, and amortization	37,422,589
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	N/A

	YES	NO
10. Is line 3 at least $10 million?	X	
11. Is line 3 at least 6 times line 1?	X	
12. Is line 7 at least 6 times line 1?	X	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14	X	
14. Is line 9 at least 6 times line 1?	N/A	
15. Is line 2 divided by line 4 less than 2.0?	X	
16. Is line 8 divided by line 2 greater than 0.1?	X	
17. Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Michael L. Piesko
Chief Financial Officer
City Management Corporation

Coopers &Lybrand

ers & Lybrand L.L.P.

a professional services firm

400 Renaissance Cen
Detroit, Michigan
48243-1507

telephone (313) 446-7100

facsimile (313) 446-7117

August 27, 1996

To the Stockholder and Management of
City Management Corporation:

We have audited, in accordance with generally accepted auditing standards, the balance sheets of City Management Corporation as of June 30, 1995 and 1994, and the related statements of income, stockholder's equity, and cash flows for the years then ended, and have issued our report thereon dated September 11, 1995.

At your request, we have read the letter and the attachment thereto from the Corporation's chief financial officer, dated August 16, 1996, in support of the Corporation's use of the financial test to demonstrate financial assurance.

We compared the data presented under Alternative I in the attachment to the aforementioned letter, with the financial statements of City Management Corporation for the year ended June 30, 1995.

In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specific data should be adjusted. This report is intended solely for the information and use of the stockholder and management of City Management Corporation and the U.S. Environmental Protection Agency, and should not be used for any other purpose.

Very truly yours,

Coopers + Lybrand L.L.P.

SHE

Attachment

Coopers & Lybrand L.L.P., a registered limited liability partnership, is a member firm of Coopers & Lybrand (International).

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

JOINT PUBLIC NOTICE

was published in said newspaper in the issues of

JUNE 17, 1996

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me, this 18 *day of* JUNE, *A.D. 19* 96

*Personally Known*_____ *or Produced Identification*_____

*Type of Identification Produced*_____

(SEAL)

INA S. KENNEDY
Notary Public, State of Florida
My comm. expires April 21, 2000
No. CC548841
NOTARY PUBLIC

JOINT PUBLIC NOTICE OF PROPOSED AGENCY ACTION
Newspaper Publication
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3804 Coconut Palm Drive
Tampa, Florida 33619-8138
813/744-6100
In conjunction with the
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV, RCRA
345 Courtland Street, N.E.
Atlanta, Georgia 30365
404/347-3555
DEP FILE NUMBER: H029-263213
EPA FILE NUMBER: FLD981932494

INTENT TO ISSUE

THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) GIVES NOTICE OF THEIR INTENT TO ISSUE JOINT PERMITS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), AS AMENDED BY THE HAZARDOUS AND SOLID WASTE AMENDMENTS OF 1984 (HSWA), SECTION 403.722, FLORIDA STATUTES (FS), AND CHAPTERS 62-4 AND 62-730 OF THE FLORIDA ADMINISTRATIVE CODE (FAC) TO Universal Waste & Transit, Inc., for the operation of the existing hazardous waste treatment and container storage facility located at 2002 North Orient Road, Tampa, Hillsborough County, Florida, having assigned facility I.D. number FLD 981 932 494. The two permits, if issued, will constitute the RCRA permit required by Florida DEP and the U.S. EPA.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

A draft permit, prepared in accordance with the provisions of Chapter 62-730 FAC, contains the conditions for the operation of a hazardous waste treatment and container storage facility at Universal Waste & Transit.

Those wastes authorized for storage at the facility includes materials having the following EPA Waste Identification

Codes:
D001-D012, D013-D024, D025-D036, D037-D043
F001, F002-F005, F006-F012, F019, F020-F028, F032-F035, F037-F039
K001-K011, K013-K052, K060-K062, K064-K066, K069, K071, K073, K083-K088, K090-K091, K093-K118, K123-K126, K131-K132, K136, K140-K145, K147-K151, K156-K161, K162-K166
P001-P018, P020-P024, P026-P031, P033-P034, P036-P051, P054, P056-P060, P062-P078, P081-P082, P084-P085, P087-P089, P092-P099, P101-P106, P108-P116, P118-P123, P127-P128, P185, P187-P205
U001-U012, U014-U039, U041-U053, U055-U064, U066-U099, U101-U103, U105-U112, U113-U139, U140-U174, U176-U194, U196-U197, U200-U211, U213-U223, U225-U228, U234-U240, U243-U244, U246-U249, U271, U277-U280, U328, U353, U359-U411

The application and copy of both the State and Federal proposed permits are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at either:
Florida Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8318
(813) 744-6100
OR
Florida Department of Environmental Protection
Hazardous Waste Permitting Section
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0300.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, FS, and Chapters 62-103, and 28-5, FAC. Petitions must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS. #35, Tallahasee, Florida 32399-3000, within forty-five (45) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the time of filing. Failure to file a request for hearing within this time frame shall constitute a waiver of any right such person may have to request a hearing under Section: 120.57, FS, or a meeting under Section 403.722 (10), FS.

A petition for formal or informal administrative hearing pursuant to Section 120.57, FS, shall contain the following information; (a) The name, address, and telephone number of each petitioner. If the petitioner challenges a Department action or proposed action on a permit application, the application's name and address, the Department Permit File Number and the county in which the project is proposed, shall also be included; (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 those material facts (i.e., those facts upon which the Department's action or proposal is based) disputed by petitioner. If no facts are disputed, petitioner shall so state; (e) A statement of 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; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition on the Department's permit is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Persons whose substantial interests have been affected by any decision of the Department have the right to intervene in the proceeding. A petition for intervention must be filed pursuant to Section 28-5.207, FAC, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administrative, 2009 Appalachee Parkway, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver or any right such person has to request a hearing under Section 120.57, FS.

The Federal draft permit contains conditions requiring the facility to investigate prior/continuing releases of hazardous waste or constituents from solid waste units. FDEP and U.S. EPA have made a preliminary determination that the proposed permits will comply with applicable state and federal regulations.

The proposed U.S. EPA permit and statement of basis are available for public inspection Monday through Friday, except legal holidays, from 8:00 a.m. to 5:00 p.m. at the U.S. EPA Library. All data submitted by the applicant to the U.S. EPA is available as part of the administrative record at:
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR (p) 124.11. The hearing request must be in writing and should be addressed to Mr. Alan Farmer, U.S. EPA, at the above address within 45 days of this notice.

A copy of the proposed U.S. EPA permit may be obtained by contacting Mr. Alan Farmer, U.S. EPA at the above address. A nominal fee for copying may be charged.

Any interested person may submit written comments on this proposed State agency action to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619-8138, or the proposed U.S. EPA action to the U.S. Environmental Protection Agency, Region IV, 345 Courtland Street, N.E., Atlanta, Georgia 30365 Attention: Mr. Alan Farmer, within forty-five (45) days of publication of this notice. All comments on the facility will be considered by the Department in formulating a decision on issuing this permit.

2679 6/17/96

ORDER CONFIRMAT N

in agreement with
WZTM 820-AM
11300 4th St. N. Suite #318
St. Petersburg, FL 33716
(813) 577 - 7131

The Team
SPORTS RADIO
820 AM

ORDER NO.	ORDER DATE	CUSTOMER ID	CO-OP FOR
6787	06/14/96	CIT850	
ADVERTISER		SALESPERSON	
WZTM-AM		KYLE CALDWELL	PAGE: 1

BILL TO: CITY ENVIRONMENTAL SERVICES

CITY ENVIRONMENTAL SERVICES
7202 EAST 8TH AVE.
TAMPA, FL 33619-

CONDITIONS

All programs and announcements must conform to the standard spot radio conditions approved by the American Association of Advertising Agencies, National Association of Broadcasters, Station Representatives Association, Radio Advertising Bureau and the National Association of FM Broadcasters.

Two (2) Weeks notice of cancellation is required on announcements, and (4) four weeks notice is required on programs.

Terms Net 30 days.

Commercial production requires two (2) working days prior to broadcasting.

JOHN TAYLOR
813 623 5302

LOGGED AS: CITY ENVIRONMENTAL SERVICE

LINE	START DATE	END DATE	LENGTH	ALT WKS	TIME PERIODS	WK	DAY M	T	W	T	F	S	S	UNIT PRICE
1	06/17/96	06/17/96	240		0936p	1	1	0	0	0	0	0	0	140.00

SPECIAL INSTRUCTIONS: CITY ENVIRONMENT/INTENT TO ISSUE

		JUNE 1996		JULY 1996		TOTAL SCHEDULE	
LINE	RATE	ANNS	BILLING	ANNS	BILLING	ANNS	BILLING
1	140.00	1	140.00	0	0.00	1	140.00
		1	140.00	0	0.00	1	140.00

JOHN - This is a confirmation. You might want a copy for your files. A bill (STATEMENT) will follow.
K

JUN 96: 140.00	JUL 96:	AUG 96:	SEP 96:	PROJECTED ANNUAL BILLING
OCT 96:	NOV 96:	DEC 96:	JAN 97:	
FEB 97:	MAR 97:	APR 97:	MAY 97:	

ACCEPTED BY K B Caldwell
Conditions printed above and on reverse side approved and agreed to on behalf of the Advertiser, Agency, or Programmer

APPROVED BY _____
When signed by authorized representatives of the advertiser and the station this order becomes a contract binding upon both parties.

744-Q125

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

July 22, 1996

Mr. John A. Taylor
Technical Services Manager
City Environmental Services, Inc. of Florida
7202 East Eight Avenue
Tampa, Florida 33619

Dear Mr. Taylor:

This letter is a reminder that pending issuance of the Operating Permit renewal HO29-263213 you should submit:-

i) The required information for the Facility Change of Name as outlined in the Department's letter dated 1/19/96.

ii) The revised estimate for waste disposal and financial assurance documents to cover the maximum inbound and outbound wastes that may be present on transport vehicles at the facility.

iii) Original proof of publication for radio and newspaper broadcast.

Should you have any questions , do not hesitate to contact Bill Crawford or myself at 813-744-6100, extension 372 or 388.

Sincerely,

Roger Evans
Permitting Engineer
Hazardous Waste Regulation
Division of Waste Management

l/uwtcors2

CITY ENVIRONMENTAL SERV. S, INC. OF FLORIDA • 7202 EAST HTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

RECEIVED
MAY 08 1996
Department of Environmental Protection
BY SOUTHWEST DISTRICT

May 8, 1996

Mr. Roger Evans
Florida Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Dear Mr. Evans:

We have reviewed the draft Hazardous Waste Permit for City Environmental Services, Inc. of Florida (formerly known as Universal Waste & Transit, Inc.). The comments discussed with you during our telephone conversation on April 2, 1996 and in our April 24, 1996 meeting are attached.

You may contact me at (813) 623-5302 should you have any questions regarding this matter.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kcp
Attachment

CITY

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36 96

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA (CESF)
DRAFT HAZARDOUS WASTE PERMIT COMMENTS

1. Please confirm that there is no problem with the actual permit being issued to City Environmental Services, Inc. of Florida (CESF) instead of Universal Waste & Transit, Inc.

2. Change mailing address change to: 7202 East 8th Avenue
   Tampa, Florida 33619

3. On Page 2 of 20, waste codes P093 - P098 are omitted from the accepted waste list.

4. On Page 2 of 20, last paragraph, the word "re-manifested" should be changed to "or originated at the facility with CESF listed as the generator." Specific Condition, Part II, No. 14a should be 15a.

5. On page 3 of 20, third paragraph, (HHW), the second sentence should be qualified with "....if it has been characterized and manifested as hazardous waste by the generator."

6. On Page 3 of 20, the CESF permitted solid waste activities should be acknowledged.

7. On Page 7 of 20, Item 16.(3), annual should be changed to biennial.

8. On Page 11 of 20, Item 16, first bullet, RCRA-related should be RCRA-regulated.

9. On Page 15 of 20, Item 16.a, the words "at the opening of" should be deleted. The last sentence "This inventory shall be counted towards the maximum inventory of the storage area." should be changed to "The inventory of containers that have been loaded onto transport vehicles for outbound shipment shall be counted towards the maximum inventory of the storage area. The inventory of receipted waste which remain unloaded on the transport vehicle shall not be counted towards the maximum capacity of the facility but shall be included in the closure plan, financial assurance documents, and inspection logs. The closure plan, financial assurances, and inspection log will be modified to include an additional 15,000 gallons to cover the inventory of receipted waste which remain unloaded."

10. On Page 19 of 20, Item C.1., the word presented should be changed to prevented.

JAT:kcp

FOLEY & LARDNER
ATTORNEYS AT LAW

SUITE 1800
111 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801
TELEPHONE (407) 423-7656
FACSIMILE (407) 648-1743
MAILING ADDRESS:
POST OFFICE BOX 2193
ORLANDO, FL 32802-2193

JACKSONVILLE
TALLAHASSEE
TAMPA
WEST PALM BEACH
MILWAUKEE
MADISON
CHICAGO
WASHINGTON, D.C.

A MEMBER OF GLOBALEX
WITH MEMBER OFFICES IN

BERLIN
BRUSSELS
DRESDEN
FRANKFURT
LONDON
PARIS
SINGAPORE
STUTTGART
TAIPEI

May 2, 1996

D.E.P.
MAY - 6 1996
SOUTHWEST DISTRICT
TAMPA

Via Facsimile and
Regular Mail

William C. Crawford
District Permitting Engineer
Hazardous Waste Regulation
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Re: ***City Environmental Services/Universal Waste & Transit***
FLD981 932 492
Permit No. HO29-263213

Dear Bill:

Pursuant to our meeting of April 24, 1996 concerning the inventory of hazardous waste that remain unloaded on the transport vehicles and all containers that have been loaded on the transport vehicles for outbound shipment, we offer the following proposed change to the last two sentences of Specific Condition Part II 16a:

> "The inventory of containers that have been loaded onto transport vehicles for outbound shipment shall be counted towards the maximum inventory of the storage area. The inventory of receipted waste which remain unloaded on the transport vehicle shall not be counted towards the maximum capacity of the facility but shall be included in the closure plan, financial assurance documents, and inspection logs."

35
96

Please let us know as soon as possible whether this language is acceptable to the Department. If the language is acceptable, John Taylor will provide you with a modified closure plan, financial documents, and inspection logs.

Sincerely,

Thos K. Maurer

Thomas K. Maurer

TKM/jh
cc: Mr. John Taylor

FOLEY & LARDNER

111 North Orange Avenue, Suite 1800
Post Office Box 2193
Orlando, Florida 32802-2193
Telephone (407) 423-7656
Facsimile (407) 648-1743

TELECOPY TRANSMISSION COVER SHEET

TO: **William C. Crawford (DEP)**

TELECOPIER PHONE NUMBER: **(813) 620-6084**

FROM: **Thomas K. Maurer**

DATE: **May 2, 1996**

TIME: **10:06am**

NUMBER OF PAGES, INCLUDING COVER SHEET: **3**

CLIENT/MATTER NUMBER: **021941-0102**

COMMENTS/SPECIAL INSTRUCTIONS:

CC: Mr. John Taylor - (813) 628-0842

The information contained in this facsimile message is intended only for the personal and confidential use of the designated recipients named above. This message may be an attorney-client communication, and as such is privileged and confidential. If the reader of this message is not the intended recipient, or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Thank you.

IF YOU HAVE ANY QUESTIONS OR EXPERIENCE ANY PROBLEMS IN RECEIVING THIS TRANSMISSION, PLEASE CALL OUR OFFICE AT (407) 423-7656.

FOLEY & LARDNER
ATTORNEYS AT LAW

SUITE 1800
111 NORTH ORANGE AVENUE
ORLANDO, FLORIDA 32801
TELEPHONE (407) 423-7656
FACSIMILE (407) 648-1743
MAILING ADDRESS:
POST OFFICE BOX 2193
ORLANDO, FL 32802-2193

JACKSONVILLE
TALLAHASSEE
TAMPA
WEST PALM BEACH
MILWAUKEE
MADISON
CHICAGO
WASHINGTON, D.C.

A MEMBER OF GLOBALEX
WITH MEMBER OFFICES IN

BERLIN
BRUSSELS
DRESDEN
FRANKFURT
LONDON
PARIS
SINGAPORE
STUTTGART
TAIPEI

May 2, 1996

Via Facsimile and
Regular Mail

William C. Crawford
District Permitting Engineer
Hazardous Waste Regulation
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Re: City Environmental Services/Universal Waste & Transit
FLD981 932 492
Permit No. HO29-263213

Dear Bill:

Pursuant to our meeting of April 24, 1996 concerning the inventory of hazardous waste that remain unloaded on the transport vehicles and all containers that have been loaded on the transport vehicles for outbound shipment, we offer the following proposed change to the last two sentences of Specific Condition Part II 16a:

> "The inventory of containers that have been loaded onto transport vehicles for outbound shipment shall be counted towards the maximum inventory of the storage area. The inventory of receipted waste which remain unloaded on the transport vehicle shall not be counted towards the maximum capacity of the facility but shall be included in the closure plan, financial assurance documents, and inspection logs."

how will the financial assure numbers be calculated? That is how will the FDEP know what the maximum amount of this waste will be?

Please let us know as soon as possible whether this language is acceptable to the Department. If the language is acceptable, John Taylor will provide you with a modified closure plan, financial documents, and inspection logs.

Sincerely,

Thos K Maurer

Thomas K. Maurer

TKM/jh
cc: Mr. John Taylor

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: April 1, 1996

Subject: ***Universal waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Revised pages to the application

Attached are documents dated and submitted March 25, 1996, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. Revised pages.

Please replace information in the original application and provide any comments you may have within 30 days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

b:/uwtmemo

34
96

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

RECEIVED
MAR 25 1996
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

March 25, 1996

Mr. Roger Evans
Permitting Engineer, Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: City Environmental Services, Inc. of Florida (CESF)
FLD 981 932 494
Permit Application H029-263213

Dear Mr. Evans:

Enclosed are the revisions and responses discussed in our March 14 telephone conversation. The response includes a summary of all items noted.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kcp

enclosures

Revisions placed in application.
RE.

CITY

Recycled Paper

33
96

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: March 4, 1996

Subject: ***Universal waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 5th Notice of Deficiency (Formal Meeting)

Attached are documents dated February 28, 1996, and submitted February 29, 1996, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. A summary page of revised corrections to the application.
3. Summarized responses to each item discussed in meeting of 1/29/96.

Please replace information in the original application and provide any comments you may have within 30 days.

Note: **Universal Waste & Transit** has recently changed their name to **City Environmental Services, Inc. of Florida**

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

b:/uwtmemo

32
96

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

February 28, 1996

Mr. Roger Evans
Permitting Engineer, Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: City Environmental Services, Inc. of Florida (CESF)
FLD 981 932 494
Permit Application H029-263213

Dear Mr. Evans:

Enclosed are the revisions and responses requested in our January 29, 1996 meeting. The response includes a summary of all items noted.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kcp

enclosures

RECEIVED
FEB 29 1996
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

CITY

Recycled Paper

31 96

REQUEST FOR ADDITIONAL INFORMATION SUMMARY

February 28, 1996

1. Attachment 5.12A revised.

2. References to gas cylinders removed.

3. Inspection Plan container compatibility wording removed.

4. Inspection Log form revised to note bulk shipment capacity instead of outbound.

5. Section 7 revised to remove references to pallets of containers along walls.

6. The Contents Page of Section 14 has been modified to match previous text revisions.

7. Section 14 summary, page 6, revised for consistency.

8. Section 14, pages 9 and 10, headings reworded for consistency with Contents Page.

9. Closure Plan rewritten to include additional information on decontamination of warehouse floor, sumps, walls, and loading/unloading area.

10. Closure Plan rewritten to include additional information on sampling and analysis of decontamination fluids.

11. Closure worksheets revised to include decontamination fluid sampling and analysis for each sump and also the loading/unloading area.

12. Closure worksheets revised to include decontamination fluid volumes from all five sumps.

13. The application forms and Section 2, 3, 5, 6, 7, 9, 10, 11, 12, and 13 have been revised to change references from Universal Waste & Transit, Inc. (UWT) to City Environmental Services, Inc. of Florida (CESF).

14. Section 2, page 5 has been revised to note that if forklifts are used in Bay 2, they will be rated for ignitable work areas.

15. Other similar revisions of UWT to CESF in Section 4, 8, 14, 15, 17 and other attachments will be submitted within 10 days.

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

February 21, 1996

Mr. John A. Taylor
Technical Services Manager
City Environmental Services, Inc. of Florida
7202 East Eight Avenue
Tampa, Florida 33619

RE: ***City Environmental Services (formerly known as Universal Waste & Transit)***
Relocation of records FLD 981 932 494

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) has received your request to keep master files of Waste Profiles at your administrative office which is located across the street at 7202 East 8th Avenue. The FDEP has agreed to allow the storage of these records provided they are easily accessible for inspections, and to all local authorities that may be called upon to provide emergency services.

Should you have any questions , do not hesitate to contact me at 813-744-6100, extension 388.

Sincerely,

R Evans.

Roger Evans
Permitting Engineer
Hazardous Waste Regulation
Division of Waste Management

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP Tallahassee

1/uwtcors1

CITY ENVIRONMENTAL SER. .ES, INC. OF FLORIDA • 7202 EAS IGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

D.E.P.
FEB 20 1996
SOUTHWEST DISTRICT
TAMPA

February 14, 1996

Mr. Roger Evans
DEP, SW District
Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Evans:

City Environmental Services, Inc. of Florida (CESF), formerly known as Universal Waste & Transit, requests permission to keep master files (including originals with signatures) of Waste Profiles at our administrative office across the street from our facility. The office is located at 7202 East 8th Avenue, across 9th Avenue from the facility. Facility employees still have direct access to waste profile information electronically by means of our computerized Waste Operations Management (WOM) System.

Sincerely,

John A. Taylor
Technical Services Manager

CITY

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29
96

CITY ENVIRONMENTAL SER ES, INC. OF FLORIDA • 7202 EAS IGHTH AVENUE • TAMPA, FLORIDA 33619
(813) 623-5302
(800) 624-5302
FAX: (813) 628-0842

February 14, 1996

D.E.P.
FEB 20 1996
SOUTHWEST DISTRICT
TAMPA

Mr. Bill Crawford
DEP, SW District
Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Mr. Crawford:

A RCRA compliance inspection of the CESF TSDF was conducted by you and Roger Evans on January 24, 1996. During the inspection, containers were found to be temporarily staged along the wall in Bay 2. This was noted as a concern that may be considered a violation. The CESF TSDF permit renewal submitted January 1995 specified permissible storage of containers along the walls of Bay 2 (Figure 5.12A). I am requesting permission to store containers along the wall in Bay 2 immediately (as specified in the January 1995 permit renewal submittal). Please note that all other conditions will remain unchanged until the renewal is approved and issued. Specifically, adequate aisle space will be maintained and the facility capacity will not increase.

Please contact me as soon as possible regarding this issue.

Sincerely,

John A. Taylor
Technical Services Manager

CITY

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28
96

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: 1/29/96

TIME: 1:40

SUBJECT: Universal Waste & Transit - Discussion of applicant's last submittal on Jan 10, 1996.

A T T E N D E E S

Name	Affiliation	Telephone
Bill Crawford	FDEP - Tampa	813-744-6100 ext 372
Roger Evans	DEP	744-6100 x 388
John A. Taylor	City Environmental (formerly UWT)	813 623-5302

J. Taylor will submit his responses to the Departments concerns within 30-days RE 1/29.

TPA-02
06/93

Printed on recycled paper.

27 96

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

January 19, 1996

Mr. John A. Taylor
Technical Services Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Re: ***Universal Waste & Transit, Inc., FLD 981 932 494***
Active Permit No. HO29-171163
Pending Permit No. HO29-263213
Facility Change of Name

Dear Mr. Taylor:

As per our conversation on January 18, 1996, the information required by the Department for a facility change of name is outlined below.

1. A completed Application for Transfer of Permit Form 17-1.210(1);

2. A completed Application for Hazardous Waste Facility Permit Part I (DEP Form 62-730.900(2)(a));

3. A completed Application for Hazardous Waste Facility Permit Certification (DEP Form 62-730.900(2)(d));

4. Notification of Regulated Waste Activity (EPA Form 8700-12);

5. A certification stating that no changes are to be made which would require major modification of the existing permit or pending permit;

6. A demonstration that the new owner or operator meets the financial responsibility requirements adopted in Section 62-730.180, FAC;

7. A processing fee of $50.00 in accordance with Rule 62-4.050(4)(p)3, FAC.

The forms requiring completion in (1), (2) and (3) are enclosed. The FDEP will utilize the new name of your company as soon as the requirements are met. The information requested shall be completed and submitted with original signatures to our office, FDEP-Tallahassee and EPA -Region IV.

Sincerely,

R Evans.

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV (w/o attachment)
Satish Kastury, Administrator, FDEP - Tallahassee (w/o attachment)

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: January 12, 1996

Subject: ***Universal waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 4th Notice of Deficiency (Formal Meeting)

Attached are documents dated January 9, 1996, and submitted January 10, 1996, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. A summary page of revised corrections to the application.
3. Summarized responses to each item discussed in meeting of 12/4/95.

Please replace information in the original application and provide any comments you may have within 30 days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

b:/uwtmemo

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

January 9, 1996

RECEIVED
JAN 10 1996
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

RE: Universal Waste & Transit, Inc. (UWT)
FLD 981 932 494
Permit Application H029-263213
Fourth Response

Dear Mr. Evans:

Enclosed are the revisions and responses requested in our December 4, 1995 meeting. The response includes a summary of all items noted.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:vrd

enclosures

24
96

REQUEST FOR ADDITIONAL INFORMATION SUMMARY

(4th Submittal)

January 2, 1996

1. INSPECTION PLAN

The Inspection Plan (Section 5) has been revised to include an additional facility hazardous waste inventory form. All bulk (tankers, roll-offs, etc.) hazardous waste volumes or weights will be included on the inspection inventory forms for ease of verification that the facility is operating within its hazardous waste capacity limit. Page 3 of Section 5 has been reworded for clarification of the inspection of the loading and unloading area outside the warehouse.

The Inspection Log has been modified to note the inspection of emergency exits (specifically flammable bay doors).

2. PROCESSES, PROCEDURES, STRUCTURES, EQUIPMENT

This section (14) has been rewritten to clarify the time periods involved in the management of inbound transportation, inbound bulk shipments, unloading, loading, and outbound shipments of hazardous waste. These items are summarized on Page 6 of Section 14.

3. PREPAREDNESS AND PREVENTION

Page 8 of Section 7 has been revised to note that storage of containers along a wall will be as indicated on Attachment 5.12.

4. PROCESSES

The UWT Standard Operating Procedure (SOP) is referenced in Section 14 for the operation of the paint can processor.

5. CLOSURE

The Closure Plan and worksheets have been revised to indicate that closure is managed and conducted by an independent third party. The bulking of waste inventory to tankers, roll-offs, and sludge boxes for offsite shipment (for closure) is noted. Decontamination of 25% of the loading and unloading areas are included in the closure calculations. Decontamination of all interior walls three feet up from the floor is included in the closure calculations. Sampling and analysis of decontamination fluids are included in the revision. Several numerical mistakes have been corrected.

Department of
Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road MS #4565
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

January 2, 1996

CERTIFIED MAIL

Kathleen McCann, CPA
Corporate Controller, Waste Group
City Management Corporation
3400 East Lafayette
Detroit, Michigan 48207

Re: FLD 981932494 - Universal Waste & Transit, Inc., Tampa, Florida

Dear Ms. McCann:

I reviewed the documentation submitted to demonstrate financial responsibility for the above referenced facility and find it deficient. The financial test dated September 26, 1995, adequatley demonstrates financial assurance in the amount of $99,266 however it does not cover the most recent closure cost estimates of $128,490.

Please provide within 30 days receipt of this letter an amended financial test document reflecting the most recent closure estimate of $128,490

If you have any questions, please contact me at (904) 488-0300.

Sincerely,

David W. Mason

David W. Mason
Environmental Specialist
Solid and Hazardous Waste

D.E.P.
JAN - 4 1996
SOUTHWEST DISTRICT
TAMPA

DWM

cc: Jeff Pallas
Bill Crawford
Doug Outlaw
Merlin Russell
Fred Wick

HAZARDOUS WASTE FINANCIAL ASSURANCE STATUS REPORT
SOUTHWEST DISTRICT
07/21/95

FACILITY INFORMATION

UNIVERSAL WASTE & TRANSIT INC
EPA-981932494
HILLSBOROUGH

FINANCIAL COMPLIANCE STATUS: **SATISFACTORY** DATE OF LAST REVIEW: **6/8/95**
REQUIRED ACTION DATE: **9/30/95**
STATUS: **A** CERT CLOSED DEPT ACCEPTED: **NO** DATE ACCEPTED: **/ /**

DOCUMENT INFORMATION

DOCUMENT	REQUIRED	TYPE *	IN COMPLIANCE	COMPLIANCE DATE
Closure:	YES	FT	YES	6/8/95
Post-Closure	NO			/ /
Sudden Liability	YES	IN	YES	6/8/95
Nonsudden Liability	NO			/ /
Corrective Action:	NO			/ /
			ANNUAL DEMONSTRATION DUE:	9/30/95

ESTIMATE INFORMATION

ESTIMATE	REQUIRED	AMOUNT	DATE	APPROVED	TYPE
Closure:	YES	97,484.00	9/24/94	YES	INFLATION ADJUSTED
Post-Closure:	NO	0.00	/ /		
Corrective Action:	NO	0.00	/ /		
TOTAL:		$97,484.00			
				ESTIMATE UPDATE DUE:	9/30/95

COMMENTS

(FISCAL YEAR ENDS JUNE 30)
(COST ESTIMATES ARE INFLATION ADJUSTED INITIAL ESTIMATE
USING CORRECTED DEPT. OF COMMERCE INFLATION FACTORS)

* LC/Letter of Credit, TF/Trust Fund, PB/Performance Bond, GB/Guarantee Bond, FT/Financial Test, INS/Insurance, ES/Escrow Account, SP/Specificity
">" Requires district staff action, "(" For informational purposes")"

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

January 4, 1996

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection
Southwest Division
3804 Coconut Palm Drive
Tampa, Florida 33619

RE: Universal Waste & Transit, Inc. (UWT)
FLD 981 932 494
Permit Application H029-263213

Dear Mr. Evans:

This letter is confirmation of our conversation acknowledging that the UWT responses for the permit renewal will be submitted Tuesday, January 9, 1996.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:vrd

22
96

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: 12/4/95

TIME: 10:00 AM.

SUBJECT: Universal Waste & Transit – Discussion of application revisions and responses submitted on 11/9/95.

A T T E N D E E S

Name	Affiliation	Telephone
Roger Evans	DEP	744-6100 x 388
William Crawford	FDEP	744-6100 372
John Taylor	UWT	623-5302

John Taylor will submit a response to the Departments concerns within 30 days.

RE. 12/4/95

TPA-02
06/93

Printed on recycled paper.

21 95

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: November 15, 1995

Subject: ***Universal Waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 3rd Notice of Deficiency (Formal Meeting)

Attached are documents dated and submitted November 9, 1995, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. A summary page of revised corrections to the application.
3. Summarized responses to each item discussed in the meeting of 9/28/95.

Please replace information in the original application and provide any comments you may have within 30 days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

20
95

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

November 9, 1995

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED
NOV 09 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

RE: Universal Waste & Transit, Inc. (UWT)
FLD 981 932 494
Permit Application H029-263213
Third Response

Dear Mr. Evans:

Enclosed are the revisions and responses requested in our September 28, 1995 meeting. The response includes a summary of all items noted.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:vrd

enclosures

19
95

THIRD REVISION (11/06/95) CORRECTIONS SUMMARY

REMOVE	REPLACE / ADD
P.E. CERTIFICATION	P.E. Certification
SECTION 2	Entire Section
SECTION 3	
Page 4	Page 4
SECTION 8	Entire Section
SECTION 11	Entire Section
----------	CLOSURE WORKSHEETS
SECTION 14	Entire Section

RESPONSE SUMMARY

10/30/95 (3rd Submittal)

6. DOUBLE STACKING CLARIFICATION

The sectioning between single and double stacked storage utilization will be by a containment sump basis. Specifically, the stacking requirements will apply to all containers utilizing the same containment sump. This would make it permissible to have the containers in Bay 1A double stacked and the containers in Bay 1B single stacked since Bay 1A utilizes different containment sumps from Bay 1B. If any containers are double stacked (other than small containers manually stacked on top of single-stacked containers) in the area contained by a common containment sump, then all containers in that area would have to meet the double stacked requirements. Small containers may be manually stacked on top of single stacked containers. Section 2, Page 4 has been revised to note these items.

11. PROPOSED SECOND GATE

The proposed second gate is scheduled to be constructed by December 31, 1995. Section 3, page 4 has been revised to note this change.

42. HAZARDOUS WASTE SHIPMENT RECEIPT ACKNOWLEDGMENT

UWT will sign manifests acknowledging receipt of hazardous waste shipments within 24 hours of arrival at the facility or prior to the transporter leaving the facility, whichever is sooner. Inbound hazardous waste shipments will be unloaded within three operating days of this receipt. If the arrival dates or unloading dates are different from the receipt dates, they will be noted in the operating record.

43. DESIGNATED STORAGE AND TEMPORARY PROCESSING AREAS

Section 14, page 4 has been revised to provide additional information concerning designated storage and temporary processing areas. The section has also been revised (wording) for clarification purposes.

TRANSFER FACILITY OPERATIONS

UWT concedes to the FDEP interpretation that the UWT on-site transfer facility (located at the permitted UWT TSDF) cannot be utilized for up to 10 days transfer storage (incidental to transportation) for outbound hazardous waste shipments managed by the permitted UWT TSDF. Should the FDEP interpretation change to allow utilization of the UWT on-site transfer facility for outbound shipments, UWT would then utilize the UWT on-site transfer facility for outbound shipments. Transfer facility waste shipments will not include shipment to UWT (designated facility) or from UWT (generator). Transfer facility waste shipments will be noted in a separate Transfer Log (operating record).

UWT will insure that all UWT generated outbound hazardous waste shipments are shipped off-site from the UWT permitted facility by the fifth business day after loading the outbound shipment has been initiated (as proposed by the FDEP). The registered UWT transfer facility will continue other transfer operations per the state and federal regulations. Section 14, Page 4 has been revised to include this information.

BULK SHIPMENTS MANIFESTED TO UWT

Section 14, Page 3 has been modified to include requirements for the management of hazardous waste bulk shipments manifested to UWT. Bulk shipments may include tankers, roll-offs, and other similar type shipments. Bulk shipments are usually "brokered" via the UWT facility to secondary (ultimate) TSDFs. The UWT Waste Analysis Plan (WAP) applies to bulk shipments (manifested to UWT) as it would to container shipments of hazardous waste. Other requirements for containerized hazardous

waste shipments would also apply to bulk hazardous waste shipments (manifested to UWT). Specifically, UWT will sign manifests acknowledging receipt of bulk hazardous waste shipments (manifested to UWT) within 24 hours of arrival at the facility or prior to the transporter leaving the facility, whichever is sooner. Inbound bulk hazardous waste shipments (manifested to UWT) will be unloaded (if applicable) within three operating days of receipt. Bulk hazardous waste shipments (manifested to UWT) will be sampled and analyzed per the UWT WAP to verify conformance to its waste profile. Bulk hazardous waste shipments (manifested to UWT) will be shipped off-site by the fifth operating day after receipt at the UWT facility.

44. LOADING AND UNLOADING

Section 14, page 4 has been revised to remove the word "essentially".

45. FLUORESCENT LAMP

Section 14, page 8 has been revised concerning fluorescent lamp operations description. Specifically, fluorescent lamp crushing may occur for lamps that are managed as hazardous waste for disposal. A specific mercury-containing lamps and devices recycling permit must first be obtained prior to fluorescent lamp crushing if the lamps are managed for recycling and are not managed as hazardous waste.

34, 37, 39, 40 CLOSURE

The Closure Plan (Section 11) has been significantly revised to incorporate the Closure Worksheets utilized by the FDEP and US EPA. The revisions specifically address the following items:

- Warehouse, containment sumps, and vehicle loading/unloading areas decontamination
- Equipment purchases / rental
- Sampling locations selection
- Sampling and analysis requirements and costs
- Disposal costs
- Verification of decontamination costs and methods
- Cost of third-party closure certification, administration, overhead, and labor

50. FILTER REPLACEMENT

Section 14, page 7 has been revised to provide information on filter replacement for the aerosol can recycling unit and the fluorescent lamp crushing unit. The filters or filter media will be changed out as per the manufacturer's specifications (or equivalent). Spent filters will be managed as solid or hazardous waste (based upon waste determination). Filter specifications for the aerosol recycling unit suggest using approximately 1/2 pound of activated carbon per 1,200 aerosols. Filter specifications for the fluorescent lamp crushing unit suggest filter change-out every 2,400 lamps if utilizing the standard filter.

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

D.E.P.
OCT 30 1995
SOUTHWEST DISTRICT
TAMPA

October 25, 1995

Mr. William Crawford
Hazardous Waste Section
FDEP, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Crawford:

This letter will confirm our recent discussion (Permitting meeting September 28, 1995) concerning the use of an aerosol recycling processing unit at the UWT permitted hazardous waste facility.

UWT may begin using the unit now and will adhere to the requirements documented in our permit renewal concerning this unit. Specifically, aerosols will be mechanically emptied into a container equipped with a carbon filtration system for vapor emissions. The collected liquid will be managed as solid or hazardous waste (based upon waste determination). The crushed empty aerosols will be managed as solid waste, scrap metal, or hazardous waste (based upon waste determination). The filters or filter media will be changed out as per the manufacturer's specifications (or equivalent). Spent filters will be managed as solid or hazardous waste (based upon waste determination). Filter specifications suggest using approximately 1/2 pound of activated carbon per 1,200 aerosols. The unit will be operated in the permitted ignitable storage bay (Bay 2).

Please feel free to contact me at (813) 623-5302 should you have any questions.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kc

18
95

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

D.E.P.
OCT 30 1995
SOUTHWEST DIST.
TAMPA

October 26, 1995

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
FDEP, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Evans:

This letter is written confirmation of our recent telephone conversation setting November 9, 1995 as the date for submittal of additional information and revisions for the UWT permit renewal (H029-263213).

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kc

Copy of this letter was transmitted by fax to the Department on 10/26/95. RE

17
95

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: 9/28/95

TIME: 11:00 AM

SUBJECT: Discussion of Universal Waste & Transits response to 2nd NOD

A T T E N D E E S

Name	Affiliation	Telephone
Bill Crawford	FDEP	813-744-6100 ext 372
Terry Muse	UW+T	813 623 5302
John A. Taylor	UWT	813 623-5302
Roger Evans	DEP	744-6100 x 388

UWT will respond to comments discussed at the meeting, within 30 days unless an extension of time is requested.

RE 9/28/95.

TPA-02
06/93

Printed on recycled paper.

16
95

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: August 24, 1995

Subject: ***Universal waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 2nd Notice of Deficiency

Attached are documents dated August 21, 1995, and submitted August 22, 1995, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. A summary page of revised corrections to the application.
3. Summarized responses to each item identified in the 2nd NOD.

Please replace information in the original application and provide any comments you may have within 30 days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

b:/uwtmemo

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Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

August 21, 1995

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED
AUG 22 1995
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

Re: Universal Waste & Transit, Inc. (UWT)
FLD 981 932 494
Permit Application H029-263213
Second Notice of Deficiency Response

Dear Mr. Evans:

Enclosed are the revisions and responses requested in the Second Notice of Deficiency (NOD) issued by the FDEP on July 13, 1995. The response includes a summary of all items noted in the NOD.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:vrd

Enclosures

14
95

SECOND NOTICE OF DEFICIENCY (JULY 13, 1995)
RESPONSE SUMMARY

6. The second paragraph of Section 2, Page 4, has been revised to remove the phrase "capacity increase allows for double stacking containers ..." The revised section describes how the facility will utilize the container arrangement shown on Attachment 5.12A. The containers will normally be stored in a "single-stacked" arrangement. "Single-stacked" indicates that no forklift is necessary to load, unload, or move any container. Although the storage is referred to as "single-stacked," small containers (such as 5-gallon pails) will be manually stacked on top of the "single-stacked" containers.

ok

UWT will occasionally utilize a double-stack container arrangement. The same storage arrangement (Attachment 5.12A) shown for single-stacking will be utilized for double-stacking with the exception that the highlighted storage rows will not be utilized for container storage so that each row of double-stacked containers has access to an eight-foot aisle. Attachment 5.12A shows the container storage arrangements for both single and double stacking. The eight-foot aisle will allow turning radius access for a forklift to stack and unstack containers. Forklifts will not be utilized in the ignitable/reactive bay (Bay 2).

conflict with note on the referenced attachment

The single and double stacked container arrangements are summarized below:

SINGLE STACKED	DOUBLE STACKED
No forklift utilized.	Forklift utilized.
Two-foot (minimum) aisle space.	Eight-foot (minimum) aisle access for each row.
All bays.	Bays 1A, 1B, 3A, and 3B only (not Bay 2).
Small containers manually stacked on top of containers.	Small containers manually stacked on top of containers.
Attachment 5.12A storage arrangement.	Attachment 5.12A storage arrangement.

Not acceptable for best management practices.

The forklift utilized will be equivalent to the specifications provided for the LS2200 model. These specifications have been added to Attachment 16.

The sump grids utilized in the UWT facility warehouse are 2 inch by 3/16 inch bar grating. The gratings are ten square feet in area (each section) and cover a span of three feet. The uniform load capacity of each section of bar grating (of these specifications) is 18,330 pounds. This far exceeds the maximum expected load of 2,400 pounds for the stacking forklift plus 2,400 pounds for a pallet of four heavy 55-gallon drums (4,800 pounds total).

OK

OK 7. The title of Pages 3 through 6 of Attachment 2 has been revised to "EPA Hazardous Waste Codes". Please note that UWT is requesting to be permitted for all existing and proposed hazardous waste codes as of August 18, 1995.

9. Section 14, pages 3-6, and 14 (Processes, Procedures, Structures, and Equipment) have been revised to provide a more detailed description of the precautions for the prevention of and procedures for minimizing drips and spill. Attachments 5.12C and 5.12 D have been revised to indicate that no RCRA regulated storage or recontainerization operations will occur on the loading ramp which adjoins to Bay 3B. These revised figures also reflect that no RCRA regulated hazardous waste storage will occur in the loading docks except for transfer waste and inbound and outbound hazardous waste shipments as described in the permit.

OK

OK 10. Section 14, pages 3-6, have been revised to provide a more detailed description of the precautions and procedures for loading and unloading of roll-off containers and the management of regulated versus unregulated materials.

Proposed date inconsistent with text. 11. The second (proposed) gate is schedule to be constructed by December 31, 1995. Section 3, Page 4 has been revised to reflect this change.

OK 13. Page 10 of Section 3 has been revised to delete the word "similarly" and to delete the reference to a 9.5 mm sieve.

OK 15. Section 6, Page 5 describes where training received by UWT operations and field personnel will be documented.

34. The Closure Cost Estimate includes:

Certification	$2,000
Administrative and Overhead	$5,000
Labor	$4,000
Subtotal	$11,000

The $11,000 subtotal is to cover a third party performing the closure of the facility.

OK 37. The Closure Plan (Section 11) has been revised to provide additional information on facility decontamination.

OK 39. The Closure Cost Estimate for TSDF Operations had been revised to indicate 33 cubic yards of characteristic solids instead of 30 cubic yards. The revision is on Page 19 of Section 11.

OK 40. The schedule for final closure on Page 22, Section 11 has been revised to be consistent with the time line chart.

42. UWT will sign manifests acknowledging receipt of hazardous waste shipments within 24 hours of arrival at the facility or prior to the transporter leaving the facility, whichever is sooner. Inbound hazardous waste shipments will be unloaded within three operating days of this receipt.

Needs to be incorporated into application (Sect. 14 p.3)

43. Designated storage areas are the areas indicated on Attachment 5.12A. Hazardous waste management operations are fully described throughout this permit application. The temporary process areas are staging areas for inbound shipment, outbound shipments and recontainerization operations. The temporary processing areas may be utilized if its use can aid safe and efficient loading, unloading, or processing of hazardous waste. The temporary processing areas may be utilized to temporarily stage an inbound shipment so that labeling and documentation can be confirmed, waste analysis samples taken, and waste analysis confirmed prior to moving the containers to their designated storage location. The temporary processing areas may be utilized to temporarily stage an outbound shipment so that labeling, piececount, and documentation can be confirmed, waste analysis samples taken (if necessary), and waste analysis confirmed (if necessary) prior to moving the containers to their designated outbound vehicle. The temporary processing areas may be utilized to facilitate hazardous waste processing operations such as recontainerizations. Section 14, Page 3, provides additional information about the temporary processing areas.

Transfer Facility Operations

The utilization of the UWT Transfer Facility for outbound hazardous waste shipments from UWT to other designated TSDFs is permissible. There are no federal or state regulations which specifically prohibit this practice. An EPA memorandum (October 31, 1990 enclosed) on Transfer Facility Regulation Interpretation specifically states that "a permitted or interim status treatment and storage facility that is the *designated facility* for a particular shipment off waste cannot function as a transfer facility with respect to that waste." This specifically refers to inbound shipments. UWT agrees with this interpretation and does not seek to operate as a transfer facility for inbound hazardous waste shipments manifested to the UWT TSDF. However, it is entirely appropriate for UWT to act as a transfer facility with regard to outbound shipments. UWT is the generator and transporter for outbound shipments and is not the "designated facility." The EPA memorandum therefore does not prohibit the use of a transfer facility for outbound shipments from a TSDF. The term "transfer facility" is defined in 40 CFR 260.10 as "any transportation-related facility including docks, parking areas, storage areas and other similar areas

where shipments of hazardous waste are held during the normal course of transportation." There is no question that UWT is a registered transfer facility. The only remaining issue is whether or not the hazardous waste is held during the normal course of transportation.

UWT initiates an outbound hazardous waste shipment by loading a vehicle. A load list and a hazardous waste manifest are generated for that vehicle the day the load is initiated. All hazardous waste containers are accounted for in the facility operating record and on the manifest. The manifest is signed by the generator and transporter the day the load is initiated. Any changes to the load are acknowledged on the load list and manifest. Changes may include (but are not limited to) adding containers manifested from other generators to a TSDF (other than UWT) or adding containers manifested from UWT as the generator. All hazardous waste transfer facility shipments will remain at the facility a maximum of ten days. All transporters load vehicles for shipment and must comply with 40 CFR 263 during loading operations. Therefore, these practices meet the definition of hazardous waste being held during the normal course of transportation. UWT believes that if this same transfer facility storage were to occur at an offsite transfer facility, it would be acceptable. Thus, UWT is being "penalized" for being a permitted TSDF if it is not allowed to have full use of its onsite transfer facility.

OK 44. The first sentence of Paragraph 2, Page 4, in Section 14 has been revised to remove the word "similar".

OK 45. UWT will pursue specific mercury recycling permits at a later date prior to the initiation of any mercury recycling operation requiring these permits. This permit application addresses hazardous waste mercury management operations.

Question was not answered. 50. Attachment 13 (Filter Press Log) has been revised to include a notation documenting filter cloth inspections and replacements.

Need to address the filter unit on the aerosol can recycler and fluorescent bulb crushing.

Florida Department of

Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: 8/9/95

TIME: 12:45

SUBJECT: UWT - Discussion of 2nd NOD

A T T E N D E E S

Name	Affiliation	Telephone
Roger Evans	FDEP	744-6100 x 388
Bill Crawford	FDEP	744-6100 x 372
John Taylor	UWT	813 623-5302
TERRY MUSE	UWT	" "

TPA-02
06/93

13
95

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

July 13, 1995

Mr. John A. Taylor
General Manager
Universal Waste & Transit, Inc.
9280 Bay Plaza Boulevard
Suite 707
Tampa, Florida 33619

RE: ***Universal Waste & Transit Inc., FLD 981 932 494***
Permit Application HO29-263213
Second Notice of Deficiency

Dear Mr. Taylor :

The Florida Department of Environmental Protection (FDEP) has completed its review of the revised Operating Permit Application and determined that the information submitted is not complete. When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-730.200 and Chapter 403.0876 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 30 days could subject you to formal enforcement action. If you cannot submit this information in 30 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

Three copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response.

In addition, each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper of lower right-hand margin) and the response must be labeled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

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If you would like to arrange a meeting or if you have any questions, please contact me at (813) 744-6100 extension 388.

Sincerely,

R. Evans.

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee

NOTICE OF DEFICIENCY

6. The second paragraph of Section 2, page 4, identifies that "capacity increase allows for double stacking containers.....". Please explain how the "capacity increase" can "allow" any action. The capacity increase allows the storage of more containers, but does not dictate how to manage the containers.

According to the information provided, UWT plans to utilize double stacking of containers in Bays 1, 2 and 3. Please include the type of equipment that will be used to stack containers or pallets. If for example, you plan to utilize a forklift, provide information for load capacity, weight and turning radius. Also provide scale drawings of aisle space to allow for the turning radius of a forklift for movement within the bays. What is the load bearing capacity of the sump grid supports? How will this equipment meet the fire code requirements of Bay 2 that has been specifically designed and built for storage of ignitable and reactive hazardous waste.

The management of containers at other facilities is immaterial. UWT needs to direct their comment specifically to their facility since this is what is being permitted.

7. Attachment 2 identifies waste codes that UWT proposes to be added to the permit application. The permitted hazardous waste numbers listed on pages 3 through 6 of Attachment 2 shows that these waste codes are already permitted. Please explain how this is possible when the Department has not issued a permit.

9. According to Figure 5.12C, and the associated legend in Figure 5.12D, recontainerization operations may be located anywhere in the loading docks or bays. The application should describe the precautions for the prevention of and procedures for minimizing drips and spills as the equipment is moved from one area to the next, especially in the area of the concrete loading docks where these operations could possibly increase the risk of contamination to the environment.

Note: Storage or recontainerization operations on the loading ramp which adjoins to Bay 3B is *not* acceptable. Also storage (except for transfer waste) in the loading docks is *not* acceptable. Please revise the legend in Figure 5.12D to reflect this change.

10. The discussion of roll-offs is still incomplete. No discussion was presented in your response for unloading practices and the management of regulated versus unregulated materials.

11. The construction date of the second proposed gate is not consistent with that mentioned in your response and the revised Section 3, page 4.

13. Your response did not address our comments. The question regarded the use of the word *similarly* in the description of the management practices for hazardous debris. The response refers to land disposal restrictions differences that affect management at the treatment or disposal facility. The concern of the FDEP is for the differences at UWT.

15. Please identify where training received by UWT operation and field personnel are/ will be documented?

34. No adjustment to the closure cost estimate was calculated to show that it is based on a third party performing the closure of the facility.

37. This is not an acceptable response. Please provide documentation to support your figures.

39. Conversion tables show that 6655 gallons equates to approximately 33 cubic yards and not 30 cubic yards. Please revise all affected estimates in Section 11 to reflect the new closure cost estimate for TSDF Operations.

40. The time line chart provided does not appear to reflect your written schedule. Examples of some differences are noted in the Waste Processing & Disposal and Facility Decontamination time schedule. Please clarify this inconsistency.

42. The FDEP agrees that receipt of waste is documented by the receiving treatment storage or disposal facility signing the manifest. The intent of the original question was to determine at what point in time, after arrival of a shipment of hazardous waste at the UWT facility, does the operator sign the manifest.

43. Your response did not fully address our comments. Please identify or describe the differences between the designated and temporary storage areas.

Please explain what is implied by "UWT plans to continue utilization of the transfer facility" found in the first paragraph of Section 14, page 4. This appears to have no relationship to your discussion of the processing areas.

The FDEP agrees that UWT has incorporated the transfer facility into the Contingency Plan and Closure Plan, however, we disagree with UWT's position of holding outbound re-manifested waste in the transfer mode. The FDEP position for the 10-day storage of waste applies to waste that has neither being terminated nor re-manifested at the facility.

44. The Department understands that loading is putting on and unloading is taking off. UWT has stated in Section 14, page 4, paragraph 2 first sentence "Loading of outbound shipments will be managed similar.....". Please explain the differences or rewrite the process description to remove the word similar.

45. If UWT plans to receive mercury containing devices destined for recycling they must obtain a Chapter 62-737 F.A.C. permit. UWT may incorporate the information required by the mercury application with this operating application provided they satisfy the requirement of Chapter 62-737 F.A.C., submit the completed mercury application form with references to the hazardous waste operating application, and appropriate application fee.

50. Where in the facility's operating record will the filter replacement for recontainerization operations be documented?

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: June 26, 1995

Subject: ***Universal waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 1st Notice of Deficiency

Attached are documents submitted on June 27, 1995 which are subject to the referenced permit application. This package contains the following information:

1. Four summary pages of revised corrections to the application.

Please incorporate this information into the response to 1st NOD.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

11
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REVISION 02 (06/19/95) CORRECTIONS SUMMARY

D.E.P.
JUN 27 1995
TAMPA

REMOVE	REPLACE / ADD
GENERAL	
Binding Title Page	Binding Title Page
Cover Page	Cover Page
None	Summary p. 1-12
SECTION 1 - APPLICATION	
P.E. Certification	P.E. Certification
Part 1 A, Application, Page 1 of 5	Part 1 A, Application, Page 1 of 5
Part 1 A, Application, Page 3 of 5	Part 1 A, Application, Page 3 of 5
SECTION 2 - GENERAL INFORMATION	
Page 1 - 10	Page 1 - 11
SECTION 3 - GENERAL FACILITY STANDARDS	
Page 1	Page 1
Page 4	Page 4
Page 7	Page 7
Page 10	Page 10
SECTION 4 - WASTE ANALYSIS PLAN	
Page 1	Page 1
Page 4 - 7	Page 4 - 7
Page 10 - 17	Page 10 - 17
Page 24 - 26	Page 24 - 26
SECTION 5 - INSPECTION PLAN	
Page 1	Page 1

SECTION 6 - TRAINING PROGRAMS

Page 1	Page 1
Page 4	Page 4

SECTION 7 - PREPAREDNESS AND PREVENTION PROCEDURES

Page 1	Page 1
Page 4	Page 4
Page 8	Page 8

SECTION 8 - CONTINGENCY PLAN

Page 1	Page 1
Page 5	Page 9 (should read Page 5)
Page 12	Page 12
Page 15	Page 15
Page 28	Page 28

SECTION 9 - RECORDKEEPING

Page 1	Page 1

SECTION 10 - SOLID WASTE MANAGEMENT UNITS

Page 1	Page 1
Page 5	Page 5

SECTION 11 - CLOSURE PLAN

Page 1	Page 1
Page 6	Page 6
Page 9	Page 9
Page 13	Page 13
Page 14	Page 14
Page 18	Page 18
None	Closure Schedule

SECTION 12 - FINANCIAL REQUIREMENTS

Page 1	Page 1

SECTION 13 - USE AND MANAGEMENT OF CONTAINERS

Page 1	Page 1
Page 7	Page 7

SECTION 14 - PROCESSES AND PROCEDURES

Page 1	Page 1
Page 3 - 16	Page 3 - 17

SECTION 15 - MISCELLANEOUS UNITS

Page 1	Page 1
Page 4	Page 4
Page 5	Page 5
Page 9	Page 9
None	P.E. Certification Letter (P.1-3)

SECTION 16 - AIR REQUIREMENTS

Page 1	Page 1
Page 12	Page 12
Page 13	Page 13
None	Figure 6-1 (Fick's Law)

SECTION 17 - ITEMS NOT APPLICABLE

Page 1	Page 1

ATTACHMENT 2

Page 1	Page 1-6

ATTACHMENT 3

None	Page 1-4, 1-18, 1-3, 1-11

ATTACHMENT 5

5.6	5.6
None	5.12 A, B, C, D

ATTACHMENT 13

None	P.E. Certification Letter (P.1-3)

ATTACHMENT 16

None	16.1

State of Florida
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Interoffice Memorandum

To: Satish Kastury
Administrator, Tallahassee

Thru: Bill Crawford, District Engineer, Tampa
Hazardous Waste Regulation

From: Roger Evans, District Engineer, Tampa
Hazardous Waste Regulation

Date: June 26, 1995

Subject: ***Universal Waste & Transit, FLD 981 932 494***
Operating Permit Application HO29-263213
Response to 1st Notice of Deficiency

Attached are documents dated June 19, 1995, and submitted June 23, 1995, which are subject to the above referenced permit application. This package contains the following information:

1. Single page cover letter from UW&T.
2. Summarized responses to each item.

Please replace information in the original application and provide any comments you may have within 30 days.

Attachments

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV

10
-95

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

RECEIVED
JUN 23 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

June 19, 1995

Mr. Roger Evans
Permitting Engineer
Hazardous Waste Section
Department of Environmental Protection, SW District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: Universal Waste & Transit, Inc. (UWT)
FLD 981 932 494
Permit Application H029-263213
Notice of Deficiency Response

Dear Mr. Evans:

Enclosed are the revisions and responses requested in the First Notice of Deficiency (NOD) issued by the FDEP on March 30, 1995. The response includes a summary of all items noted in the NOD.

Please contact me at (813) 623-5302 should you have any questions or require any additional information.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kc

Enclosures

9
95

BEST AVAILABLE COPY

RECEIVED
JUN 23 1995
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Revision: 01
Date: 6/19/95

FIRST NOTICE OF DEFICIENCY (MARCH 30, 1995) RESPONSE SUMMARY

GENERAL

1. Permit number H029-171163 refers to the existing UWT permit. References to this number have been deleted and replaced by permit number H029-263213 which was issued for this permit renewal.

OK

SECTION 1- APPLICATION

2. The site is owned by Universal Transit Property Company. The application has been revised to clarify this item.

OK

3. Process code T40 refers to Filtration (utilizing the UWT filter press) as referenced in 40 CFR Appendix I to Part 264.

OK

Attachment 2 has been revised to list all waste codes and designate which waste codes will be stored within each bay.

4. The site is owned by Universal Transit Property Company. The application has been revised to clarify this item.

OK

SECTION 2 - GENERAL INFORMATION

5. Section 2, Page 3, refers to "approved" transfer facility. This has been revised to "registered" transfer facility.

OK

6. Section 2 has been revised to provide additional information describing double stacking of containers including movement, leaks, inspections and other information.

7. Attachment 2 has been revised to provide a complete list of all waste codes (listing all codes separately).

OK 8. Section 2, Page 8, has been revised to change the word "typically" to "some" so that Paragraph 2 is consistent with Paragraph 1.

9. The recontainerization operations locations have been identified on Attachment 5.12.

10. Section 2, Page 10, has been revised to provide additional information describing roll-off loading and unloading practices.

SECTION 3 - GENERAL FACILITY STANDARDS

11. The second (proposed) gate will utilize essentially the same means to control entry as the existing gate. It will consist of a 6 foot chain-link gate topped with barbed wire. The gate will remain closed and electronically locked except when admitting vehicles and personnel in or out. The gate is proposed to be constructed by June 30, 1995.

OK 12. All areas of Bay 2 (including the east wall) are at least 50 feet from the property line.

13. Hazardous debris will be managed similarly and in the same locations as other non-debris hazardous waste. The only difference is that the land disposal restrictions of some hazardous debris may vary from those of non-debris hazardous waste. UWT will comply with land disposal restrictions specified in 40 CFR Part 268 for all hazardous waste whether it is debris or non-debris.

SECTION 4 - WASTE ANALYSIS PLAN

OK 14. All RCRA-regulated wastes treated or stored at the facility will be handled in accordance with the Waste Analysis Plan (WAP) procedures. Non-RCRA regulated waste is, by definition, not regulated by RCRA. The term "all wastes" throughout the application should read to mean "all RCRA regulated wastes" unless the application specifically references non-RCRA regulated wastes. Non-RCRA regulated waste will be managed at the facility. This will not interfere with the management of hazardous waste at the facility. It is UWT's current policy to screen non-RCRA regulated waste for hazardous characteristics utilizing the UWT WAP.

15. UWT operations and field personnel are trained annually in completing waste profiles, DOT regulations (hazard classes, shipping names, and more) manifesting, and Land Disposal Restrictions (LDR).

OK 16. Section 4, Page 6, has been revised to the following:

6. The pre-acceptance evaluation will be recertified at minimum annually. Recertification or pre-acceptance evaluations will be done when any of the following occur:

   Annually
   Waste Generation Process Changes
   Waste Analyses or Screening Changes
   Regulatory Changes Related to Waste Analysis

OK 17. UWT operations personnel are trained in sampling methods and procedures. The training includes personal protective equipment, sampling requirements, sampling equipment, and sampling techniques.

OK 18. Section 4, Page 11, has been changed to include the proper sampling method for crushed or powdered material (ASTM D364-75).

OK 19. The use of a spot check system is intended to verify that the waste received is the same as the waste that was characterized and identified on the pre-acceptance evaluation (waste profile). This is not designed to characterize the waste.

OK 20. All RCRA-regulated waste shipments will be sampled and analyzed according to the UWT Waste Analysis Plan (WAP). This includes bulk shipments manifested to UWT even though it may be remanifested out immediately and not stored at the facility.

OK 21. The terms Mandatory Waste Analysis, Waste Analysis Fingerprint, and Mandatory Fingerprint Analyses all refer to the same thing. All references to these terms have been revised to "Mandatory Waste Fingerprint Analyses" to reflect consistency.

OK 22. A minimum of 10% of UWT packed hazardous waste lab packs will be opened and inspected. Each generator packed hazardous waste lab pack (100%) will be opened and inspected.

OK 23. The word "materials" has been replaced by the term "hazardous waste" on Page 26 of Section 4 (Waste Analysis Plan).

SECTION 6 - TRAINING PROGRAMS

OK 24. The acronym for Hazardous Waste Operations and Emergency Response has been corrected to "HAZWOPER".

OK 25. The UWT Training Data Sheet of Page 21 of Section 6 (Training Programs) heading of "UWT HW Date" is the date that the UWT employee was assigned to hazardous waste operations.

SECTION 7 - PREPAREDNESS AND PREVENTION

OK 26. The 1/8 inch per foot slope of the floors provides additional available containment beyond the 1,000 gallons of each containment sump. Conservatively, the additional containment available from the floor slope has not been included in containment calculations.

OK 27. The containment sumps are able to be inspected even if containers are stored on the containment grating cover. UWT personnel have been inspecting the sumps daily for five years and the DEP has inspected the facility on numerous occasions. The contents of the sump are visible even with containers on the grating because the containers or pallets do not completely obstruct the view of the sumps.

SECTION 8 - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

OK 28. The word "extend" has been replaced by the work "extent" on Page 12 of Section 8.

OK 29. Page 12 of Section 8 has been revised to reflect the new FDEP 24-hour emergency telephone number (904 413-9911).

OK 30. The last two sentences of Page 15 of Section 8 have been revised to the following sentence:

> The coordinator or alternative is therefore able to identify the source, characteristics, amounts, and extent of any released materials by observations, review of the facility data, records and shipping documents, or chemical analysis.

OK 31. Item 8 of Page 28 of Section 8 has been corrected to state "Dispatch waste shipments to secondary approved permitted waste treatment or disposal facilities."

OK 32. The mobile filter press may be utilized or stored at a generator site, at the UWT facility, or expansion facility. The mobile filter press will be cleaned and decontaminated after completion of processing batches of hazardous waste prior to removal from the facility or being brought back to the facility.

SECTION 10 - SOLID WASTE MANAGEMENT UNITS

OK 33. The UWT voluntary groundwater monitoring wells are identified on Attachment 8.1, the facility record drawing (site plan and survey). The wells are sampled and analyzed, at minimum, annually. The selection of constituents to analyze for is dynamic and depends on the results of previous analyses and on the results of analyses from other facilities in the area (particularly the National Priorities List sites). Copies of previous analytical results are on file with the DEP.

SECTION II - CLOSURE PLAN

34. The UWT Closure Plan has been revised to reflect a third party managing all waste inventory and overseeing closure of the facility.

OK 35. Page 9 of Section 11 has been corrected to indicate 12,100 gallons instead of 8,800.

OK 36. The selection of only four locations for soil sampling is justified for several reasons. The inclusion of one sample from the stormwater pretreatment unit area and one from the stormwater retention pond should be sufficient without additional sampling. No further action or sampling should be required if these samples do not indicate releases of hazardous constituents from the facility. In the unlikely event that releases of hazardous waste or hazardous waste constituents were to occur by the facility, the most likely path of migration would be the stormwater system. It would be highly unlikely that releases occurred if they were not detected in these two areas. The inclusion of two additional samples allows an upgradient sample from the northwest corner of the facility and a downgradient sample from the southeast corner of the facility be investigated beyond the stormwater pretreatment and retention areas.

37. The volumes of 275 gallons of equipment decontamination residuals and 1,100 gallons of warehouse decontamination residuals are conservative estimates based on 5 years of commercial emergency response and field services experience.

OK 38. The Reactive/Flammable Solids closure cost subtotal has been corrected from $10,200 to $12,900.

39. The expected maximum quantity of other (characteristic) hazardous waste at closure at the UWT permitted hazardous waste facility is indicated on Page 8 of Section 11 as 13,310 gallons. This volume was split in half to include 6,655 gallons of liquids and 6,655 gallons of solids. The 6,655 gallons of solids converts approximately to 30 cubic yards. $6655 \text{ gals} \times (4.951 \times 10^{-3}) = 32.9$
≈ 33 cu yds.

40. A closure time line chart has been incorporated into the permit renewal as Page 24 of Section 11. Does not appear to reflect written schedule.

SECTION 13 - CONTAINER MANAGEMENT

ok 41. Wastes will be removed from sumps as soon as possible. Wastes will be removed the same day that waste is discovered in the sump by the daily (or other) inspections.

SECTION 14 - PROCESSES, PROCEDURES, STRUCTURES AND EQUIPMENT

42. Receipt of a hazardous waste shipment is constituted by the TSDF authorized representative's signature on the hazardous waste manifest acknowledging receipt of the waste.

43. Temporary processing areas have been identified on Attachment 5.12. The areas are normally utilized as normal permitted hazardous waste storage and processing areas. A temporary berm or containment will be utilized to designate and contain the temporary processing area when in use. A sign designating "Temporary Processing Area" and "Temporary Processing Start Date _____" will also be utilized for each temporary processing area. The temporary processing area, temporary berm or containment will contain the volume of the largest container or 10% of all containers in the temporary area (whichever is greater). UWT plans to continue utilization of the transfer facility. The transfer facility has been fully identified in this permit submittal, is incorporated in the UWT Contingency Plan, is incorporated into the UWT Closure Plan, and exceeds all applicable requirements.

Rule 62-730.180(10), F.A.C. states that "the owner or operator of a permitted hazardous waste facility who desires to locate a transfer facility at the hazardous waste facility shall apply for a permit modification. The permit modification shall require public notice as described in Rule 62-730.220(9)(c) and (d), F.A.C." UWT has been operating a registered transfer facility at the UWT permitted hazardous waste TSDF for approximately five years. The transfer facility operations, including outbound shipments, is specifically identified in this permit renewal. The Contingency Plan, Closure Plan,

and several other sections specifically address transfer facility requirements. Since the proposed 10-day storage as part of a transfer facility meets all applicable requirements, UWT will continue utilization of the transfer facility as set forth in the application. Transfer facilities which are not located at permitted hazardous waste TSDFs are allowed to store waste up to 10 days with significantly less protection against the release of hazardous waste (secondary containment, emergency response training, procedures, and equipment, facility security, facility monitoring, financial responsibility, and more).

44. The main differences between unloading of inbound waste and the loading of outbound waste are that unloaded inbound waste is physically removed from the transport vehicle and placed into the warehouse for storage and processing, while the loading of outbound waste is essentially the reverse. The waste is physically removed from the warehouse and placed into the transport vehicle. Inbound waste paperwork is reviewed for completeness, accuracy, quantities, and piece count. Outbound paperwork is completed and reviewed for the same items. Inbound loads are unloaded within three days, while outbound loads are loaded within three days. Outbound loads utilizing the transfer facility are loaded within ten days.

45. UWT has been managing spent mercury containing lamps and devices for the duration of its existing permit. The items were managed as hazardous waste, recycled, or managed as solid waste depending upon waste analyses, profiles, and regulatory requirements. UWT recently registered with the FDEP as a Mercury-Containing Lamp and Device Transporter and Storage Facility. UWT has previously conducted, currently conducts, or plans to conduct three activities which may require permitting by Chapter 62-737, F.A.C. A Mercury Recovery Facility permit may be required for operations such as removing a sealed ampule of mercury from a piece of equipment. An example would be removing the mercury containing float switch from a sump pump. A Mercury Volume Reduction Facility permit may be required for any volume reduction operations.

An example would be utilizing the fluorescent lamp crusher. A Storage Facility permit may be required for the storage of mercury lamps or devices beyond 180 days, 2,000 kilograms of lamps, or 100 kilograms of devices.

The current UWT hazardous waste permit and the UWT hazardous waste permit renewal allow these operations for the management of mercury as hazardous waste. The additional permits only cover mercury for recycling. Therefore, the three specified mercury permits should be incorporated into this permit renewal. UWT will comply with all requirements of Chapter 62-737, F.A.C.

ok 46. The word "if" has been replaced by "it" on Page 9 of Section 14.

ok 47. The last sentence of the first paragraph of Page 13 of Section 14 has been deleted to avoid confusion.

ok 48. The words "loading and unloading" have been deleted from the first sentence of the second paragraph of Page 13 of Section 14.

ok 49. Documentation of filter carbon replacement will be included in the facility operating record. UWT may increase the amount of sand or carbon if it becomes necessary.

50. The paint can processing, aerosol recycling, fluorescent bulb crushing, and empty drum and rag compactor equipment will be inspected prior to each batch use. The inspections will be included in the facility operating record. Filter replacement will be according to the manufacturer's specifications. Filter replacement will be documented in the facility operating record.

SECTION 15 - MISCELLANEOUS UNIT

OK 51. All applicable information required by 40 CFR 264 Subpart X is included in this renewal. An independent, qualified Professional Engineer registered in the State of Florida has provided an engineering assessment of the filter press system. The assessment has been included in this section.

SECTION 16 - AIR EMISSIONS

OK 52. The assumption that VOC emissions from covered roll-offs is further substantiated in Section 16.

OK 53. Item 1 of Page 8 of Section 16 has been re-worded for clarification.

OK 54. A copy of Figure 6-1 (Fick's Law correction factor) has been included in Section 16.

MISCELLANEOUS

OK 55. The maximum storage capacity within each bay is listed below:

Bay 1 - 20,000 gallons
Bay 2 - 10,000 gallons
Bay 3 - 20,000 gallons

This is indicated on attachment 2.

OK 56. Page 7 of Section 13 and Page 5 of Section 15 have been revised to indicate that the warehouse floor is approximately four feet above the exterior ground elevation, as previously indicated on the record drawings (site plan / survey) included as Attachments 8.1 and 8.2.

OK 57. The FDEP permit checklist has been included in Attachment 3.

OK 58. Attachment 5.6 has been revised to include land uses for properties north and east of the UWT facility.

59. Attachment 5.12 has been revised to show recontainerization locations.

OK with proviso. 60. The proper closure cost is $128,490. Attachment 12 is a draft example of financial assurances. Upon approval of the permit renewal, the actual financial assurances will reflect the actual closure cost.

OK 61. The equipment specifications for the drum compactor have been included as Attachment 16.

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Mr. John A. Taylor
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, FL 33619-3356

May 23, 1995

Re: *Universal Waste & Transit, Inc., FLD 981 932 494*
Operating Permit Application HO29-263213
Miscellaneous Unit(s)

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) is in receipt of your letter dated May 16, 1995 concerning the miscellaneous unit(s) at the Universal Waste site in Hillsborough County. The information provided in the referenced application describes the filter press and associated operations, but fails to provide an engineering assessment of the system by an independent, qualified Professional Engineer registered in the state of Florida.

The engineering assessment must establish that the filter system has sufficient structural integrity and is acceptable for the treating of hazardous waste. The assessment must show that the structural supports, seams, connections and pressure controls are adequately designed and that the filter system is compatible with the waste to be treated. Additionally, the assessment should provide design standards for the head tank and the filter press.

Do not hesitate to contact me at 744 - 6100 extension 372, should you have any questions.

Sincerely,

William C. Crawford
District Permitting Engineer
Hazardous Waste Regulation
Division of Waste Management

wcc

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator , FDEP - Tallahassee

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Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

D.E.P.
MAY 22 1995
SOUTHWEST DISTRICT
TAMPA

May 16, 1995

Mr. Roger Evans
Southwest District
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Evans:

This letter is to confirm our previous conversations concerning the schedule for submitting responses to the First Notice of Deficiency. The Department agreed to notify UWT of the specific additional information requirements (if any) concerning Section 15 Miscellaneous Units. UWT cannot address this item until this information is received. All information concerning the First Notice of Deficiency will be submitted within 30 days of recipet of the specific additional information requirements (concerning Section 15 Miscellaneous Unit) from the Department.

You may contact me at (813) 623-5302 should you have any questions concerning this matter.

Sincerely,

John A. Taylor
Technical Services Manager

JAT:kc

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Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

May 15, 1995

RECEIVED
MAY 19 1995
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

Florida Dept. of Environmental Protection
Attention: Mr. Roger Evans
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr Evans:

Universal Waste & Transit, Inc. (UWT) operates a permitted hazardous waste treatment, storage, and transfer facility at 2002 North Orient Road, Tampa, Florida. Non-hazardous and hazardous wastes are stored and transported in Department of Transportation (DOT) approved containers at the facility. All wastes are shipped off-site for disposal in accordance with all local, state, and federal regulations.

A copy of the UWT Contingency/Emergency Response Plan was previously sent to you. The plan is designed to minimize hazards to human health and environment. It describes actions which would be taken if a fire, explosion, or release of hazardous waste should occur. Enclosed is a copy of the revised Emergency Notifications page. Please replace Page 7 with the 5/15/95 revision of Page 7.

Universal has a staff of trained and experienced employees. Universal has maintained an outstanding safety record since it began operations in 1990. However, in the unlikely event that an emergency should occur, we wish to call upon you for assistance. Please review our Contingency/Emergency Response Plan.

You may contact me at (813) 623-5302 should you have any questions or wish to schedule a familiarization tour of the facility.

Sincerely,

John A. Taylor

John A. Taylor
Technical Services Manager

Enclosures

Revised Emergency Notifications
was placed in Section 8, p. 5
of Operating Permit Application
H029-263213

RE.

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EMERGENCY NOTIFICATIONS

ALL EMERGENCIES - 911.

After normal working hours, contact the following Universal Waste & Transit Emergency Coordinators:

Bob Mulholland	Alternates:	Larry Sinatra	Matt Edson	Melvin Mackey
6522 Woodland Blvd.		6816 Thomas Cir	309 Palm Key Cir #107	5206 Nesmith Road
Pinellas Park, FL 34665		Tampa, FL 33619	Brandon, FL 33511	Plant City, FL 33567
813 544-5272		813 623-6567	813 661-3520	813 767-4647
Pager: 813 271-4012		813 271-4015	813 271-4013	813 292-1770

All Emergency Coordinators have the authority to commit corporate funds during an emergency incident.

Fire Department and Outside Contractor Notifications

In any emergency situation, contact the following: (1) Tampa Fire Department (911). Indicate the extent and type of emergency which exists (fire, spill, etc.). (2) In the event of emergencies involving chemical spills, leaks, or explosions, (which may require additional assistance) at the direction of the Universal Waste & Transit Emergency Coordinator/Alternate one of the following spill response contractors should be notified:

Inland Waters Pollution Control, Inc. 8955 Palm River Road Tampa, Florida 33619 (813) 626-5564	OHM 1340 Mohawk Road Clermont, FL 34711 (904) 394-8601 / Fax: 904 394-7722

Hospitals

Tampa General Hospital Davis Island, Tampa 813 251-7000	Brandon Hospital 119 Oakfield Drive, Brandon 813 681-5551

Government Agency Notification

In the event of an emergency where environmental contamination is eminent, in addition to notifying the Tampa Fire Department (911 emergencies), the following governmental agencies will be notified by the UWT Emergency Coordinator/Alternate.

Florida Dept. of Environmental Protection	904 488-0190 (normal working hours) 904 413-9911 (24-hour)
US Coast Guard National Response Center (NRC)	800 424-8802
Florida DEP, SW District, Tampa Office	813 744-6100 (normal working hours)
US Coast Guard-Tampa Marine Safety Div.	813 228-2189
Hillsborough County Solid Waste Dept.	813 272-5680
Florida Marine Patrol	813 272-2516
City of Tampa HAZMAT Team	813 227-7015 (Emergencies - 911)

In addition to the NRC, you must contact the government official designated as the On-Scene Coordinator (OSC). This can be accomplished by calling (904) 413-9911.

5/15/95

Florida Department of

Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: 5/4/95

TIME: 10:30

SUBJECT: Universal Waste & Transit - Discussion of 1st NOD

A T T E N D E E S

Name	Affiliation	Telephone
Jerry M Mure	Universal Waste & Transit	623-5463
John J Taylor	" " "	623-5302
Tom Maurer	Foley & Lardner	407 423-7656
SRI RAO	Engl & Applied Sci	973-3850
Warren Pandorf	KBN Eng & Applied Sci.	287-1717
Gilber Dembeck	FDEP	(813) 744-6100, ext. 399
Walter C Lufrist	FDEP -	813-744-6100 ext 372
Roger Evans	FDEP	744-6100 x 388

TPA-02
06/93

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Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

March 30, 1995

Mr. John A. Taylor
General Manager
Universal Waste & Transit, Inc.
9280 Bay Plaza Boulevard
Suite 707
Tampa, Florida 33619

RE: ***Universal Waste & Transit Inc., FLD 981 932 494***
Permit Application HO29-263213
First Notice of Deficiency

Dear Mr. Taylor :

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-730.200 and Chapter 403.0876 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 30 days could subject you to formal enforcement action. If you cannot submit this information in 30 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Universal Waste & Transit to each item shall be as noted in Section 62-730.220(5), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper of lower right-hand margin) and the response must be labeled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Three copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or if you have any questions, please contact me at (813) 744-6100 extension 388.

Sincerely,

REvans.

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

re

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee

NOTICE OF DEFICIENCY

General
The permit number HO29-171163 is identified on the cover page of each section. This should be deleted as it has no relation to the renewal of this application.

Section 1 Application
If the site is presently leased as indicated, what is the expiration date of this lease?

Page 5 of 5 of DEP Form 17-730.900(2)(a) & Attachment 2
- What type of process is code T40 referring to?
- Please include as an addition to Attachment 2 a breakdown of all waste codes which will be stored within Bays 1, 2 and 3.

Page 2 of 4 of DEP Form 17-730.900(2)(d) indicates that the facility owner is Universal Transit Property Company and the land owner is Universal Transit Property Company, so how can the land be leased when the facility and land owner is the same?

Section 2 General Information
p.3 The third paragraph makes reference to a state "approved" transfer facility. Please remove this word as there is no formal approval process in becoming a transfer facility.

p.4 UWT is requesting a hazardous waste storage capacity increase from 33,600 gallons to 50,000 gallons. Please specify where double stacking of containers will occur to accommodate this capacity increase. How will management of these containers be addressed to satisfy movement, leaks, inspections, etc?

p.4 Paragraph three identifies that previously omitted and new waste codes are being added. Please provide a complete list of all waste codes that you are requesting to be added, as well as, any previously permitted waste codes that are being deleted from this application submittal.

p.8 Paragraph one indicates "some" waste will be recontainerized whereas paragraph two, says "typically" waste are recontainerized. Please clarify this inconsistency.

p.8-9 Please identify the location within the facility where recontainerization operations will be performed.

p.10 The discussion of roll-offs is incomplete. Please include a discussion of the unloading practices and when free-flowing liquids will be added and under what circumstance. (See second comment for Sect.14, p.3)

Section 3 General Facility Standards

p.4 Describe means to control entry, at all times, through the second (proposed) gate into the active portion of the facility (e.g., by means of an attendant, television monitors, etc.). When will this proposed gate be constructed?

p.7 The application states that all ignitable and reactive wastes are stored at least 50-feet from all property lines. Figure 5.12 shows that waste stored in Bay 2 (flammables/reactives) will abut the east wall of the container storage building. The application should describe the measures to be taken to ensure the required 50-feet setback. [40 CFR 264.176]

p.10 Identify where in the facility UWT will manage hazardous debris and in what types of containers will it be managed. Explain why there is a difference in particle size between solid materials and nonfriable inorganic solids?

Section 4 Waste Analysis Plan

p.4 According to paragraph one, "*all wastes*" treated or stored at the facility will be handled in accordance with the Waste Analysis Plan (WAP) procedures. Please describe how non-RCRA regulated waste will be managed under this WAP.

p.4 Please include a narrative description of the involvement that UWT field personnel have in completing the waste profile and land disposal restriction forms.

p.6 Item 6 appears to be a run-on sentence. Please revise as needed.

p.10 According to the first sentence in Sampling Methods, "Sampling is performed at the facility by UWT personnel trained to sample incoming materials". Please identify the type of training required for UWT personnel trained to sample incoming waste.

p.11 Is the sampling method for crushed or powdered material correctly identified (ASTM D364-73)?

p.12 The use of a spot check system to quickly verify that received waste is the same as the material contracted for receipt is not designed to characterize a waste, and is not sufficient for this purpose. This sentence should be revised to more accurately describe the purpose of the spot check system.

p.16 Paragraph four states that "all *waste shipments* will be sampled and analyzed....." What are the sampling procedures for bulk shipments that are not stored at UWT.

p.17 Are the terms identified below inter-related? If this is the case please correct the text to reflect consistency.

Mandatory waste analyses (p.12)
Waste analysis fingerprint (p.16)
Mandatory fingerprint analyses (p.17)

p.26 There is a lack of clarity between the last two sentences as to how lab packs will be managed at the facility. Please specify what percentage of UWT packed and generator packed lab packs will be opened and inspected.

p.26 The word "materials" is not defined. The application should not contain any ambiguous terms. Please rephrase to be more specific.

Section 6 Training Programs

p.4 Should the acronym for Hazardous Waste Operations and Emergency Response be written as HAZWOPER instead of HAZWOPR?

p.21 The chart on this page identifies one of the title headings as "UWT HW Date". What does this title mean?

Section 7 Preparedness and Prevention

p.4 Please expand on what you intend when you say, "sloping of the floor would nearly double the available containment".

p.8 Please explain how daily inspections of the containment sumps are possible if sumps are covered by containers.

Section 8 Contingency Plan and Emergency Procedures

p.12 "Extend" should be replaced by "extent".

p.12 The new FDEP 24-hour emergency telephone number has been changed to (904)413-9911.

p.15 Last sentence on this page does not make sense and appears to need some sentence restructuring.

p.28 Please explain how the disposal of these waste materials will be facilitated.

Where will the mobile filter press unit (Figure 5.12) be located when <u>not</u> in use.

Section 10 Solid Waste Management Units

p.5 The text identifies that UWT voluntarily monitors groundwater at the facility. Please explain in more detail, what this monitoring entails. Please include diagrams locating any monitoring wells that are part of your voluntary monitoring program.

Section 11 Closure Plan

The closure plan is based upon UWT shipping the final inventory of waste and decontamination fluids to off-site treatment and disposal facilities. Although this may be the case, the closure cost estimate must be based upon a third party managing all waste inventory and overseeing the closure of the facility. [40 CFR 264.142 (a)(2)]

p.9 In paragraph one, please identify where 8,800 gallons was obtained.

p.13 Your closure plan identifies that soil sampling will be performed at four locations around the site. The application should justify the selection of only four locations.

p.13 Identify how estimates of 275 gallons from decontamination of process equipment and 1,100 gallons from other equipment and floors were calculated.

p.18 The cost associated for disposal of Reactive/Flammable Solids identifies a subtotal of $10,200. How was this amount calculated?

p.19 Please show how the amount of 30 cubic yards, for disposal of solids, was calculated.

p.22 The Department recommends a time line chart (a simplified representation of your anticipated time frame to complete final closure activities) to be incorporated along with your descriptive schedule for final closure.

Section 13 Container Management

p.7 Paragraph two states that waste will be removed from sumps in a "timely" manner. Please be more specific.

Section 14 Processes, Procedures, Structures, and Equipment

p.3 The last line of the first paragraph states:- ".....will be unloaded within three days of receipt of the shipment". What constitutes *receipt* of shipment?

p.3 What are the differences between the designated processing area and the temporary processing area? Where are the locations of these temporary and designated processing areas which are occasionally used for outbound and inbound waste?
Please be advised that past practices of the temporary storage of outbound shipments in the "transfer mode" will no longer be acceptable. The Department will consider a reasonable period of time for load consolidation. This has typically been three days or less.

p.3 Line one in paragraph two makes reference to the word "similar" when comparing loading of outbound waste with unloading of inbound waste. The word similar implies some differences. What are these differences?

p.5 The application outlines the intended use of a fluorescent bulb crusher for recontainerization of waste. Please provide documentation that UWT will meet all requirements of Chapter 62-737 F.A.C., "Management of Spent Mercury - Containing Lamps and Devices Destined for Recycling".

p.9 The word "if" probably should be "it".

p.13 Please explain what is intended by the last sentence of the first paragraph.

p.13 Please explain what is intended by the first sentence of the second paragraph.

p.14 This section specifies that carbon filters for the Stormwater Pre-Treatment System will be replaced at least annually. Please include verbiage to reflect that filter replacement will be documented.

Please provide an inspection schedule for the machinery (i.e. aerosol can recycling, fluorescent bulb crushing, etc.) which will be utilized in waste recontainerization operations. Filter replacement for specified machinery needs to be documented as well.

Section 15 Miscellaneous Unit
p.3 This text refers to the filter press as a miscellaneous unit. Should this be the case please submit all the required information that meets the requirements of 40 CFR 264 Subpart X.

Section 16 Air Emissions
p.7 Please substantiate the assumption that VOC on covered roll-offs are negligible?

p.8 Item 1 appears to need some sentence restructuring.

Tables 2, 4 and 6 of this section makes reference to a Figure 6-1. A copy of Figure 6-1 should be included in the application.

Miscellaneous
Throughout the application the narrative refers to the storage area as capable of storing a capacity of 50,000 gallons. Please identify the maximum storage capacity within each bay.

The application appears to have some inconsistency between the height of the exterior ground elevation and the floor of the storage building. This may be observed in (Section 13, p.7, line 2 and Section 15, p.5, line 16). Please clarify and make the necessary changes in the application.

The table of contents identifies the submittal of a FDEP permit checklist in Attachment 3. This information was not included in your submittal.

Surrounding land use is addressed and shown on a figure (Figure 5.6), however the land use towards the north and east of UWT was not identified

Please provide on a facility drawing the location within the facility where recontainerization operations will be carried out (i.e. paint can processing, aerosol can recycling, fluorescent bulb crushing and empty container and rag compactor).

Attachment 12 identifies the closure cost as $128,400, however, Section 11, page 20 shows the cost as $128,490. Please explain this contradiction and make the necessary changes in the application.

Equipment specifications for the drum compactor as noted in Attachment 16 was not submitted.

I N T E R O F F I C E M E M O R A N D U M

Date: 01-Feb-1995 05:25am EST
From: Janet Ashwood TAL
ASHWOOD_J@A1@DER
Dept: Waste Management
Tel No: 904/488-0300
SUNCOM:

TO: William Crawford TPA (CRAWFORD_W@A1@TPA1)

CC: Bheem Kothur TAL (KOTHUR_B@A1@DER)

Subject: Universal Waste & Transit, Inc. - Operating Renewal

I have no comments on the operating renewal for UW&T. There are really no major changes other than some information inclusion and increased capacity. Any questions or comments, please call me.

Thanks
Janet

3
95

Florida Department of

Memorandum

Environmental Protection

TO: Satish Kastury,
Administrator, Hazardous Waste Program, Tallahassee

FROM: Bill Crawford
Hazardous Waste Permitting WCC

DATE: January 4, 1995

SUBJECT: ***Universal Waste & Transit, Inc. FLD 981 932 494***
Operating Permit Application Renewal File No. HO29-263213

Attached, please find correspondence dated December 29, 1994 and submitted January 3, 1995. The package includes the following items:

1. A cover letter from Universal Waste & Transit, Inc..

2. Operating permit renewal application (2 copies).

I am sending USEPA IV's copy directly to them. Any questions, please call me at 813-744-6100, ext. 372.

Attachments

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV (one set of attachments)
Tampa District Office (one set of attachments)

uwttran.doc

file 3-c
~~23/95~~ 2/95

Universal Waste & Transit, Inc.
A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

RECEIVED
JAN 03 1995
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

December 29, 1994

Mr. William Crawford
FDEP SW District
Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Crawford:

Enclosed is the Universal Waste & Transit, Inc. (UWT) Hazardous Waste Operating Permit renewal. The submittal includes four (4) copies (each with original signatures), in three-ring binders, with additional attachments in large envelopes. Enclosed also is a certified bank check for the $10,000 permit renewal fee.

The renewal submittal is for the UWT Hazardous Waste Operating Permit No. H029-171163, Facility ID No. FLD 981 932 494, with the expiration date of July 3, 1995. The submittal is more than 180 days prior to the existing permit expiration date as required by FDEP regulations.

Please do not hesitate to call me if you have any questions or require any additional information.

Sincerely,

John A. Taylor
General Manager

JAT:kc

Enclosures: 4 Permit Renewal Copies (each with original signatures)
4 Envelopes with Attachment No. 6
4 Envelopes with Attachment No. 10
1 Check for $10,000 for permit renewal fee

file 3-c
1/95