

## CHRONOLOGICAL ENTRY FORM FOR FOLDERS

USL City Environmental Services (aka UWT)

FLD 981 932 494 HO29-263213

Permit Correspondence Page 1 Vol (3-h)

[illegible]



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

December 20, 2000

Mr. Michael Knox  
USL City Environmental Services of Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, Florida 33619

D.E.P.  
DEC 28 2000  
Southwest District Tampa

Re: FLD 981 932 494  
USL City Environmental Services of Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, Florida 33619

Dear Mr. Knox:

The department reviewed the documentation submitted to demonstrate financial assurance and finds it in order. The Amwest Surety Insurance Company surety bond # 1367711, effective June 3, 1998, now for \$220,746 still covers the closure cost approved by the department. The standby trust fund agreement established on June 30, 1998 between USL City Environmental Services of Florida, the Grantor, and Barnett Bank, the Trustee, remains adequate. In addition, the certificate of liability insurance demonstrating coverage for sudden and nonsudden accidental occurrences, policy # PEC0005378, is also adequate.

Therefore, USL City Environmental Services of Florida, Inc. is in compliance with the financial assurance requirements of 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact me at 850-488-0300.

Sincerely,

*Edgar Echevarria*

Edgar Echevarria  
Environmental Specialist II  
Hazardous Waste Regulation

CC: Jeffrey Pallas, EPA/Region 4  
Stanley Tam, FDEP/SW District

## Memorandum

## Florida Department of Environmental Protection

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TO: Doug Outlaw  
PE III, Tallahassee

THRU: Satish Kastury, Administrator, Tallahassee  
SCT Stanley Tam, Section Manager,  
Hazardous Waste Regulation, Southwest District

FROM: *AG* Al Gephart, Engineer III,  
Hazardous Waste Regulation, Southwest District

DATE: December 18, 2000

SUBJECT: *US Liquids of Florida, Inc.*  
*(fka USL City Environmental Services of Florida, Inc.)*  
*EPA ID# 981 932 494*  
*Change of Name*

Attached, please find the notification and documents regarding a name change from  
USL City Environmental Services of Florida, Inc. to US Liquids of Florida, Inc.

Should you have any comments, please contact Al Gephart (813-744-6100 ext. 372) or  
Stanley Tam (ext 390).

Attachments

cc: Doug McCurry, EPA Region IV

File: 3-h  
33/00



Gary J. Van Rooyan  
Vice President & General Counsel  
(281) 272-4506  
Fax (281) 272-4557

D.E.P.  
DEC 15 2000  
Southwest District Tampa

December 14, 2000

VIA FEDERAL EXPRESS

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

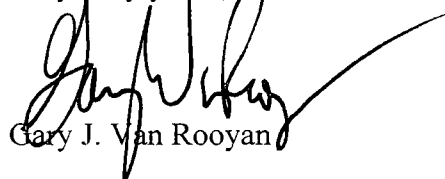
Re: USL City Environmental Services of Florida, Inc.  
EPA ID # 981 932 494

Dear Mr. Evans;

This is to inform you that USL City Environmental Services of Florida, Inc. has changed its name to U S Liquids of Florida, Inc., effective November 1, 2000, as reflected by the enclosed documents. This was an administrative name change only. There was no change of ownership or control nor was there any change in financial backing. U S Liquids Inc. was the parent and owner of 100% of the stock of USL City Environmental Services of Florida, Inc. prior to the name change and remains the parent and owner of 100% of the stock of U S Liquids of Florida, Inc.

Please reflect this name change in your files and in connection with all permits previously issued by your Department to USL City Environmental Services of Florida, Inc.. If you require anything further, please do not hesitate to let me know.

Very truly yours,



Gary J. Van Rooyan

cc: Mike Knox (w/ encl)

File: 3-h  
32/00

**CT CORPORATION SYSTEM**

**D.E.P.**  
**DEC 15 2000**  
**Southwest District Tampa**

November 1, 2000

Ms. Rachel Little  
Long Aldridge & Norman  
1 SunTrust Plaza, Suite 5300  
303 Peachtree Street  
Atlanta, GA 30308

**RE: USL City Environmental Services of Florida, Inc.**  
**changed name to:**  
**US Liquids of Florida, Inc.**  
Order #: 2414278

Dear Ms. Little:

As instructed, we enclose the following document(s), as issued by the State of Florida:

**Evidence of Name Change Amendment filed on 11/1/2000**

If you have any questions concerning this order, please contact Denise Pfannkuche in our Atlanta office. Thank you for this opportunity to be of service.

Very truly yours,

CT-Tallahassee

Enclosure(s)

Via: Federal Express  
/cb

660 East Jefferson Street  
Tallahassee, FL 32301  
Tel. 850 222 1092  
Fax 850 222 7615



FLORIDA DEPARTMENT OF STATE

Katherine Harris  
Secretary of State

November 1, 2000

C T CORPORATION SYSTEM

TALLAHASSEE, FL

Re: Document Number P98000041526

The Articles of Amendment to the Articles of Incorporation of USL CITY ENVIRONMENTAL SERVICES OF FLORIDA, INC. which changed its name to US LIQUIDS OF FLORIDA, INC., a Florida corporation, were filed on November 1, 2000.

Should you have any questions regarding this matter, please telephone (850) 487-6050, the Amendment Filing Section.

Cheryl Coulliette  
Document Specialist  
Division of Corporations

Letter Number: 300A00056838

**ARTICLES OF AMENDMENT  
TO  
ARTICLES OF INCORPORATION  
OF  
USL CITY ENVIRONMENTAL SERVICES OF FLORIDA, INC.**

USL CITY ENVIRONMENTAL SERVICES OF FLORIDA, INC., (the "Corporation"), a corporation organized and existing under and by virtue of the Florida Business Corporation Act, does hereby certify:

**FIRST:** That, the Board of Directors of the Corporation unanimously adopted a resolution setting forth a proposed amendment to the Articles of Incorporation of the Corporation, declaring said amendment to be advisable, and directing that said amendment be presented to the stockholders of the Corporation for consideration by the stockholders. The resolution setting forth the proposed amendment is as follows:

**"RESOLVED,** that the Corporation's Articles of Incorporation be amended to change the name of the Corporation and that such amendment be effected by deleting ARTICLE I of the Corporation's Articles of Incorporation in its entirety and substituting in lieu thereof:

"ARTICLE I

Name and Duration

The name of the Corporation is US Liquids of Florida, Inc. The duration of the Corporation is perpetual."

**SECOND:** That except as expressly provided herein, all of the terms and provisions of the Articles of Incorporation, as amended, shall remain in full force and effect and are hereby ratified and confirmed in all respects.

**THIRD:** That the foregoing resolutions have been adopted by the unanimous written consent of the holders of record of all the outstanding stock of the Corporation entitled to vote thereon, dated as of the 30<sup>th</sup> day of October, 2000.

**FOURTH:** That the aforesaid amendments were duly adopted in accordance with the provisions of Section 607.181 of the Florida Business Corporation Code.

[SIGNATURE ON FOLLOWING PAGE]

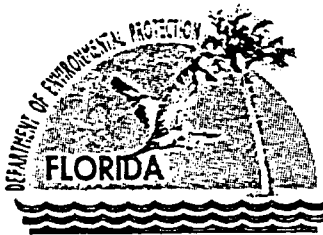
FILED  
00 NOV -1 PM 1:25  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA  
ATLANTA 11/3/00 3:25

IN WITNESS WHEREOF, the Corporation has caused this certificate to be signed as of  
this 30<sup>th</sup> day of October, 2000.

**USL CITY ENVIRONMENTAL SERVICES OF  
FLORIDA, INC.**

  
\_\_\_\_\_  
**W. GREGORY ORR, PRESIDENT**





Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Scrubs  
Secretary

DATE: 12-20-99

TIME: 9:30 AM

SUBJECT: CITY ENV. SVC. - PRE-APPLICATION FOR RENEWAL OF PERMIT

## ATTENDEES

<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
ROGER EVANS	DEP	744-6100 x 388
AL GERHART	DEP	" x 372
Mike Knox	DEL - CEST	623-5302 x 235
Stanley Tam	DEP	744-6100, x-390

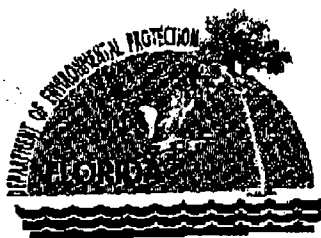
Discussed:- 1) Review fee for Operating permit - 10K

" " " Construction " - 15K

2) Modification to incorporate construction permit into Operating permit

3) Update closure cost estimate once construction has been completed and certified

4) Faxed info on notice publication of applications



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
November 18, 1999

David B. Struhs  
Secretary

Mr. Mike Knox  
Technical Services Manager  
City Environmental Services Inc. of Florida  
7202 East Eighth Avenue  
Tampa, Florida 33619

Post-It® Fax Note	7671	Date	12/14/99	# of pages	1
To	Mike Knox	From	Bheem Kothur		
Co./Dept.	CES, Inc.	Co.	FDEP/Tallahassee		
Phone #	813-626-7451	Phone #	850-656-1399		
Fax #	813-623-5302	Fax #	850-921-8018		

Mike, per our discussion please confirm the

Re: FLD 981 932 494 - USL City Environmental Services, Inc. of Florida  
Tampa, Florida, permit H029-263213

Dear Mr. Knox:

We have reviewed the Hazardous Waste Facility Certificate of Liability Insurance, policy number NTL251098001, effective September 4, 1999, with Reliance National Indemnity Company and find it in order. The face amount of \$220.746 adequately covers the inflation adjusted closure estimate required by the Department. Additionally the Hazardous Waste Facility Certificate appears to meet sudden and nonsudden requirements.

Remember your next financial assurance demonstration is due no later than September 4, 2000.

USL City Environmental Services, Inc. of Florida is in compliance with the financial requirements of 40 CFR Part 264 Subpart H, as adopted by reference in Rule 62-730.180, Florida Administrative Code.

If you have any questions, please contact Bheem Kothur or Doug Outlaw at (850) 488-0300.

Post-It® Fax Note	7671	Date	12/15/99	# of pages	1
To	Mike Knox	From	Bheem Kothur		
Co./Dept.	CES, Inc.	Co.	FDEP/Tallahassee		
Phone #	813-623-5302	Phone #	850-656-0300		
Fax #	813-623-0842	Fax #	850-921-8018		

Sincerely,

*Douglas G. Outlaw*  
Doug Outlaw  
Hazardous Waste Regulations

Mike, per our discussion to day. Confirm

cc: Jeff Pallas, EPA/Region 4  
Roger Evans, FDEP/Tampa

Post-It® Fax Note	7671	Date	12/15/99	# of pages	1
To	Roger Evans	From	Bheem Kothur		
Co./Dept.	FDEP/Tampa	Co.	FDEP/Tallahassee		
Phone #	813-744-6100	Phone #	850-488-0300		
Fax #	813-744-6125	Fax #	850-921-8018		

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

Printed on recycled paper.

File 3-h  
30/99



David B. Struhs  
Secretary

A T T E N D E E S

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

D.E.P.  
AUG 04 1999  
Southwest District Tampa

Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

2 August, 1999

Attention: Stanley Tam

Re: Facility Maintenance/Upgrades (Delete Item 2)  
I.D. No.: FLD 981 932 494  
Permit No.: H029-263213

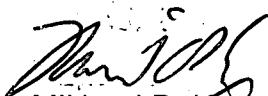
Dear Mr. Tam,

This letter is written to delete Item 2 from the attached 27 April, 1999 letter. We understand that engineering drawings and a separate modification request would be required to accomplish this task.

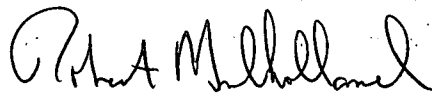
*DELETE FROM 27 APRIL LETTER ALL OF (Item 2) AS FOLLOWS:*

**Item 2.**

Two (2) floor scales are currently being used in the facility, one in Bay 1, and another in Bay 3. These scales are used to weigh materials being processed in the facility in order to provide required material tracking data. The scales are approximately 3" above finished floor (AFF) with a small ramp attached for access. Elimination of this ramp would result in the removal of the need to roll heavy drums up and down the scale. This would increase the safety and ergonomic effectiveness of weighing items with no adverse effect on the facility. As a part of the floor refinishing CESF would like to flush mount these two (2) scales. Two recesses approximately 30" x 30" x 3" deep would be cut into the existing concrete floor slab to accommodate the scales. The recesses would then be sealed along with the remainder of the floor to provide a contiguous surface of impervious material. The recess will be large enough to allow visual inspection of the area in order to monitor for any spilled materials. As a condition of the existing permit any spills are immediately cleaned up from the floor, this will not change. The floor area under the scale would continue to be maintained as it is now, clean and free of any spilled material.



Michael D. Knox  
Technical Services Manager



Bob Mulholland  
Facility Manager

File 3-h  
28/99

Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

27 April, 1999

Attention: Stanley Tam

Re: Facility Maintenance/Upgrades  
I.D. No.: FLD 981 932 494  
Permit No.: H029-263213

Dear Mr. Tam,

This letter is written to advise you of some maintenance/upgrade items that we would like to perform on our facility. The facility address is City Environmental Services Inc. of Florida (CESF), 2002 North Orient Road, Tampa, Florida, 33619. CESF does not believe that these maintenance/upgrade items require any modification to the existing permit. CESF requests authorization to perform the upgrades, as funds for facility betterment are currently available. The maintenance/ upgrade items are listed below.

<u>Item No.</u>	<u>Item description</u>	<u>Rational for Request</u>
1.	Refinish and seal floors	Existing finish is worn
2.	Flush mount floor scales	Ergonomic/Safety upgrade
3.	Remove office trailer	New office construction

Further information for each item is provided as follows:

**Item 1.**

The sealant on the floors in the facility has worn through use. The isle markings and protective layer provided by this sealant is in need of repair. CESF requests authorization to remove the old sealant and replace it with a new one. The new floor covering will provide identical isle marking and be of the same specification as the original floor.

**Item 2.**

Two (2) floor scales are currently being used in the facility, one in Bay 1, and another in Bay 3. These scales are used to weigh materials being processed in the facility in order to provide required material tracking data. The scales are approximately 3" above finished floor (AFF) with a small ramp attached for access. Elimination of this ramp would result in the removal of the need to roll heavy drums up and down the scale. This would increase the safety and ergonomic effectiveness of weighing items with no adverse effect on the facility. As a part of the floor refinishing CESF would like to flush mount these two (2) scales. Two recesses approximately 30" x 30" x 3" deep would be cut into the existing concrete floor slab to accommodate the scales. The recesses would then be sealed along with the remainder of the floor to provide a contiguous surface of impervious material. The recess will be large enough to allow visual inspection of the area in order to monitor for any spilled materials. As a condition of the existing permit any spills are immediately cleaned up from the floor, this will not change. The floor area under the scale would continue to be maintained as it is now, clean and free of any spilled material.

**Item 3.**

An administrative trailer is currently located directly west of the permitted facility. CESF will be replacing this trailer with newly constructed office space. CESF requests department approval to remove this trailer from site.

Any construction, building, transportation, demolition or other permits required for these activities will be obtained from the appropriate agency by CESF. This letter is written to coordinate with your office to ensure that we properly address any specific requirements you may have in regard to items 1-3 as written. Thank you for your assistance in this matter. Please address response, questions and/or comments to Michael D. Knox, US Liquids-City Environmental Services of Florida, 7202 East 8<sup>th</sup> Avenue, Tampa, FL 33619 or call myself or Bob Mulholland at (813) 623-5302 Ext. 235/238.

Michael D. Knox  
Technical Services Manager

Bob Mulholland  
Facility Manager

USL- City Environmental Services of Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, Florida 33619  
Michael D. Knox  
Technical Services Manager

Re: Contingency Plan Revision 01

Department of Environmental Protection  
Hazardous Waste Program  
Southwest District  
Roger C. Evans  
Engineer

Dear Mr. Evans,

The attached Contingency Plan (Revision 01 dated 6/04/99) is provided to replace the copy you currently have. The only changes are to the Emergency Coordinators list and Agency Notification list on page 5. In addition, the emergency response contractor, previously OHM, has been changed to Clark Environmental. The remainder of the plan has not been changed. A misprint was made on the last revision we sent to your office. Revision 02 was mistakenly labeled on what was intended to be revision 01. This copy should be discarded, as the attached copy is the only true revision since the original writing of the plan. If you have any questions or comments please call me at (813) 623-5302 Ext. 235.

Sincerely,



Michael D. Knox  
Technical Services Manager

June 10, 1999  
**RECEIVED**  
JUN 11 1999

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

REVISED PAGES PLACED  
IN APPLICATION

FILE: 3-1

27/99

D.E.P.  
APR 28 1999  
Southwest District Tampa

27 April, 1999

Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Attention: Stanley Tam

Re: Facility Maintenance/Upgrades  
I.D. No.: FLD 981 932 494  
Permit No.: H029-263213

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

APR 28 1999

SOUTHWEST DISTRICT  
TAMPA

Dear Mr. Tam,

This letter is written to advise you of some maintenance/upgrade items that we would like to perform on our facility. The facility address is City Environmental Services Inc. of Florida (CESF), 2002 North Orient Road, Tampa, Florida, 33619. CESF does not believe that these maintenance/upgrade items require any modification to the existing permit. CESF requests authorization to perform the upgrades, as funds for facility betterment are currently available. The maintenance/ upgrade items are listed below.

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FILE: 3-h

26/99




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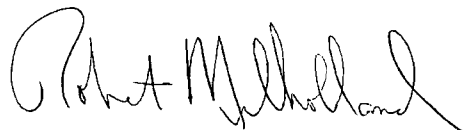
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Any construction, building, transportation, demolition or other permits required for these activities will be obtained from the appropriate agency by CESF. This letter is written to coordinate with your office to ensure that we properly address any specific requirements you may have in regard to items 1-3 as written. Thank you for your assistance in this matter. Please address response, questions and/or comments to Michael. D. Knox, US Liquids-City Environmental Services of Florida, 7202 East 8<sup>th</sup> Avenue, Tampa, FL 33619 or call myself or Bob Mulholland at (813) 623-5302 Ext. 235/238.



Michael D. Knox  
Technical Services Manager



Bob Mulholland  
Facility Manager

March 8, 1999

3-15-99

Ms. Beth Knauss  
Florida DEP, Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619

D.E.P.

MAR 11 1999

Southwest District Tampa

Gave Jamie a copy of  
the Contingency Plan  
for Chris Rossbach to  
review and sign for  
USL City.


Dear Ms. Knauss:

USL City Environmental Services of Florida, Inc. operates a permitted hazardous waste facility (EPA No. FLD 981 932 494, Permit No. HO 29-263213) located at 2002 North Orient Road, Tampa, Florida 33619. Enclosed is a copy of our Hazardous Waste Contingency Plan. The Plan has been developed to minimize hazards to human health and the environment from the unlikely event of a fire, explosion or unplanned sudden release of hazardous waste constituents to air, soil, or surface water. Please note page 5 which lists coordinators and alternates as well as agency notifications.

Please complete and sign the attached form and return it in the postage paid envelope provided. Indicate if your agency will or will not respond to any potential Contingency Plan emergency. Indicate if your agency would like to arrange a tour of our facility (at your convenience) to familiarize personnel with our capabilities, safety features, and potential hazards.

Thank you for your attention to this matter. If you have any questions or additional information, please contact me at 813 623-5302, ext. 238.

Sincerely,



Robert Mulholland  
General Manager

RM:kp

Enclosures: Contingency Plan  
Acknowledgment Form  
Stamped, Addressed Envelope

REVISED PAGES PLACED  
IN APPLICATION



file: 3-h  
25/99

**USL CITY ENVIRONMENTAL SERVICES OF FLORIDA, INC.  
HAZARDOUS WASTE CONTINGENCY PLAN RESPONSE FORM**

DATE: March 8, 1999

AGENCY: Florida DEP, SW District

I have received an updated copy of the USL City Environmental Services of Florida, Inc. (CESF) Hazardous Waste Contingency Plan.

\_\_\_\_\_ We will respond to CESF's Hazardous Waste Contingency Plan emergencies.

\_\_\_\_\_ We will NOT respond to CESF's Hazardous Waste Contingency Plan emergencies for the following reasons:

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\_\_\_\_\_ We do NOT want to have a familiarity tour of the CESF Hazardous Waste facility.

\_\_\_\_\_ We are interested in having a familiarity tour of the CESF Hazardous Waste facility on the following date and time:

Date: \_\_\_\_\_

Time: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

## facsimile cover sheet

to: Roger Evans  
from: Mike King  
date: 6-3-99  
subject: Report  
# of pages 4  
(Includes this page)

message:

Still working on contingency plan revision.  
Computer problems - will  
get it to you asap  
Thanks Mike

If any of this facsimile is not received,  
please call Extension 235.



File: 3-h  
24/99  
PRINTED

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
AUG - 4 1999  
SOUTHWEST DISTRICT  
TAMPA

**US LIQUIDS- City Environmental Services of Florida, Inc. (CESF)**

**Incident Report - 5/27/99**

**EPA ID #:** FLD 981 932 494

**Location:** 2002 North Orient Road, Tampa Florida 33619

**Time of Incident:** 6:30 PM

**Date:** 5/27/1999

**Chemicals Involved:** Approximately 45 gallons of a polymeric mix of isocyanates in a 55-gallon steel drum.

**Responding Agencies:** City of Tampa Fire Department and Hazardous Materials Team together with representatives from Hillsborough County Fire & Rescue in addition to CESF personnel.

**Damages:**

a. **Injuries:** None

b. **Property Damage:** Minimal, limited to the location of the drum where heat caused discoloration of the epoxy floor covering. This area will be recoated within June, 1999

**Notification of Incident:** The released smoke from the reaction due to overheating caused the activation of the fire alarm system providing immediate notification of the Fire Department and CESF personnel. Florida DEP, EPC and USEPA were also notified by telephone.

**Description of Incident:** At approximately 6:30 PM, Thursday May 27 1999, CESF personnel were notified that the fire alarms at 2002 North Orient Road were activated. CESF immediately attended to the emergency with the City of Tampa Fire Department and Hazardous Materials Team and Hillsborough County Fire and Rescue.

The smoke detectors were activated due to the release of smoke and fumes without the presence of fire from a 55 gallon drum located in Bay #2 containing about 45 gallons of polymeric and urethane isocyanates. The reaction is believed to have been initiated via polymerization due to the presence of impurities, humidity or incompatibility of the mixture resulting in the liberation of heat and smoke. Due to the heat generated it is believed that most of the smoke released was a resultant of the thermal decomposition of the resins to Carbon oxides (CO & CO<sub>2</sub>) and/or Nitrogen and its oxides in addition to elemental carbon. The smoke released traveled with prevailing winds east across Orient Road, this road was closed until approximately 1 AM. During this time a team comprised of both Fire Department and CESF personnel accessed the facility, located the drum and removed it to the exterior of the building. The drum was then placed into a metal overpack and immersed in water. The water cooled the drum and over a period of about one (1) hour stopped all smoke. CESF crews worked throughout the evening pressure washing the interior of the facility and

wiping the exterior of containers to remove smoke residue. The contact water was collected and placed into drums for disposal. A total of seven (7) drums, two (2) solids (PPE, Pads) and five (5) liquids were generated as a result of this incident. No soil or water was contaminated as a result of this incident all materials with the exception of the smoke were contained and recovered.

**Post Incident Measures:** The following day the required safety equipment and systems were inventoried and inspected prior to resuming normal activities. This effort included putting back into service the facilities fire alarm and suppression systems.

An investigation into the materials contained in the drum that reacted showed that a total of nine (9) containers were bulked into it on the morning of May 26, 1999. All of the materials involved were isocyanates, polyisocyanates, and polymericisocyanates with the exception of one item. Approximately 124 lbs. of Epichlorohydrin was bulked into the container as it was routed for disposal under the same profile for incineration. All items were checked for reactivity prior to mixing with negative results noted. It is assumed that this item reacted slowly as the drum was not opened or involved in any processing for approximately twenty-one hours (21) before the reaction. A summary of all containers, contents and quantity of material in each is provided as an attachment to this report.

**Corrective Measures:** As a result of this incident our internal procedures for bulking isocyanates has been revised to exclude any non isocyanate material being placed into the same container with isocyanates regardless of reactivity testing. A thorough review of all other material handling and bulking practices has been accomplished to ensure optimum safety and compliance and to minimize the potential for similar incidents to occur. CESF is confident that this was an unusual and isolated incident, most reactions occur immediately or within a short period of time. This container was checked several times, as are all containers following the bulking of materials with no indication of reaction noted (heat/pressure build up). CESF believes that this incident is closed. Both the DEP and EPA have been notified and with exception of receipt of this report have not required any further action at this time.

**Contacts:** The point(s) of contact (Emergency Coordinators) for USL-CESF are General Manager Mr. Bob Mulholland and Technical Services Manager Mr. Michael D. Knox. The address for written correspondence is USL-City Environmental Services of Florida, Inc. 7202 East 8<sup>th</sup> Avenue Tampa, Florida 33619. The telephone number is (813) 623-5302 and Fax number (813) 626-7451.

## Attachment 1- Materials Summary

The following list shows all materials that were involved in the drum reaction.

Contents	CESF Drum #	Quantity	Generator
Epichlorohydrin	68621-LZI-004	154 lbs.	Lonza, Inc.
Polyurethane Isocyanates	64725-USZ-020	101 lbs.	US Army COE
Polyurethane Isocyanates	64724-USZ-019	49 lbs.	US Army COE
Isocyanate, Flammable, Toxic, NOS	67981-UII-011	6 lbs.	Unison
Isocyanate, Flammable, Toxic, NOS	68295-CLC-039	8 lbs.	Collier County
Isocyanate, Flammable, Toxic, NOS	68585-PIN-057	4 lbs.	Pinellas County
Isocyanate, Flammable, Toxic, NOS	68121-VCC-007	4 lbs.	Orange County
Isocyanate, Flammable, Toxic, NOS	66652-MTD-104	2 lbs.	Dade County
Polymeric Isocyanate	67276-CLX-007	124 lbs.	Celotex

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**DIVISION OF LAW ENFORCEMENT**  
**Bureau of Emergency Response**  
**INITIAL REPORT OF EMERGENCY RESPONSE INCIDENT**

Incident Number: <b>99-04-0355</b>	County: <b>Hillsborough</b>	BER District: <b>4</b>	Date of Incident: <b>5/27/99</b>	Time of Incident: <b>~2030</b>																								
Date Reported to BER: <b>5/27/99</b>	Time Reported to BER: <b>2217 hours</b>	BER Employee Receiving Initial Report: <b>Jeff Tobergte</b>	BER Location Initial Report Received: <b>Tampa; 813/744-6462</b>																									
Incident Reported By: <b>Danny</b>	Affiliation: <b>State Warning Point (SWP)</b>		Phone Number (include area code): <b>800/320-0519 SWP</b>																									
Location of Incident: <b>(at facility, see below)</b>																												
Nearest City/Town: <b>Tampa</b>			Latitude:	Longitude:																								
Incident Description: <input type="checkbox"/> UST Tank Leak <input type="checkbox"/> AST Tank Leak <input type="checkbox"/> Air Release <input type="checkbox"/> Valve Leak <input type="checkbox"/> Complaint <input type="checkbox"/> Dumping <input type="checkbox"/> Spill <input type="checkbox"/> Fire		Response Actions: <input type="checkbox"/> Leak Stopped <input type="checkbox"/> Soil Removed <input type="checkbox"/> Samples Taken <input type="checkbox"/> Absorbent Used <input type="checkbox"/> Contractor Hired <input type="checkbox"/> Fire Extinguished <input type="checkbox"/> Photographs Taken <input type="checkbox"/> Neutralized <input type="checkbox"/> None Taken <input type="checkbox"/> Booms/Dikes <input type="checkbox"/> waste removed																										
Responsible Party: <b>City Env. Svcs. of Fla., Inc.</b>		Contact Person (include title): <b>Bob Mulholland, Mike Knox</b>		Phone Number (w. area code): <b>813/623-5302</b>																								
Responsible Party's Address (include city, state, zip): <b>7202 E. 8 Av., Tampa FL 33619</b>																												
Material: <b>isocyanates drum</b>		Amount: <b>1 55-gal. drum</b> <input type="checkbox"/> lb.		Category Code (see below): <b>814</b>																								
Category Codes (choose one, most specific category for each material above, and enter the code on the appropriate box): <table style="width: 100%; font-size: small;"> <tr> <td>01 Oil</td> <td>05 Paint</td> <td>09 Chlorine</td> <td>13 Oxidizer</td> <td>17 Sewage</td> <td>21 PCB</td> </tr> <tr> <td>02 Fuel</td> <td>06 Solvent</td> <td>10 Ammonia</td> <td>14 Reactive</td> <td>18 Wastewater</td> <td>22 Fertilizer</td> </tr> <tr> <td>03 Crude Oil</td> <td>07 Flammable (misc.)</td> <td>11 Gas (not NH3 or CL2)</td> <td>15 Explosive</td> <td>19 Radioactive</td> <td>23 Biohazard</td> </tr> <tr> <td>04 Petroleum (misc.)</td> <td>08 Poison (misc.)</td> <td>12 Pesticide/Herbicide</td> <td>16 Corrosive</td> <td>20 Solid Waste</td> <td>24 Unknown</td> </tr> </table>					01 Oil	05 Paint	09 Chlorine	13 Oxidizer	17 Sewage	21 PCB	02 Fuel	06 Solvent	10 Ammonia	14 Reactive	18 Wastewater	22 Fertilizer	03 Crude Oil	07 Flammable (misc.)	11 Gas (not NH3 or CL2)	15 Explosive	19 Radioactive	23 Biohazard	04 Petroleum (misc.)	08 Poison (misc.)	12 Pesticide/Herbicide	16 Corrosive	20 Solid Waste	24 Unknown
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04 Petroleum (misc.)	08 Poison (misc.)	12 Pesticide/Herbicide	16 Corrosive	20 Solid Waste	24 Unknown																							
Substantial Threat of Discharge to the Environment: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		Contractor Used: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Name:																										
Responding Agencies: <input type="checkbox"/> EPA <input type="checkbox"/> FMP <input type="checkbox"/> USCG <input checked="" type="checkbox"/> Police/Sheriff <input type="checkbox"/> FHP <input type="checkbox"/> GFC <input type="checkbox"/> Local EM <input type="checkbox"/> Local Program <input type="checkbox"/> HRS <input type="checkbox"/> DOT <input checked="" type="checkbox"/> Fire Dept. <input type="checkbox"/> Local Road Dept. <input type="checkbox"/> Other:		Agencies Notified: <input type="checkbox"/> EPA <input type="checkbox"/> GFC <input type="checkbox"/> NRC <input type="checkbox"/> Local EM <input type="checkbox"/> FHP <input type="checkbox"/> FMP <input type="checkbox"/> TBER <input type="checkbox"/> Local Program <input type="checkbox"/> HRS <input type="checkbox"/> DOT <input type="checkbox"/> USCG <input type="checkbox"/> Local Road Dept. <input checked="" type="checkbox"/> SWP (800/320-0519)																										
USCG Notified: <input type="checkbox"/> Jacksonville <input type="checkbox"/> Tampa <input type="checkbox"/> Miami		Name / Rank of Person in USCG Notified:		Phone Number (include area code): <input type="checkbox"/> 800/424-8802 (NRC).																								
Narrative: <b>At about 2030 hours, a smoke alarm sounded inside flammable storage bay#2 at the City Env. hazardous waste storage facility. Tampa FD/HazMat responded, and City Env. implemented its contingency plan. The cause was a drum of isocyanates that was smoldering, but no fire ensued. The drum was taken outdoors, and placed into a 110-gallon overpack drum. Water was placed in the overpack to surround the smoldering drum, and the reaction subsided. The exact cause of the reaction is uncertain, perhaps water or other contaminant initiated the reaction. No BER assistance needed.</b>																												
<input type="checkbox"/> Cleanup report/disposal documentation received ____/99. <input checked="" type="checkbox"/> BER case closed. <input type="checkbox"/> Case referred.																												
Follow-up referred to:		Incident copies sent to: <b>DEP Haz. Waste Section</b>		BER Notification: <input type="checkbox"/> Fax <input type="checkbox"/> Verbal																								
BER Response: <b>Jeff Tobergte</b> <input type="checkbox"/> Yes (attach investigative report) <input checked="" type="checkbox"/> No		Signature of Regional Employee:		Date: <b>5/28/99</b>																								



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 10-8-98 Subject Storage of 3 roll-off containers  
Time \_\_\_\_\_ Permit No. HO29-263213  
County Hills.  
Mr John Taylor Telephone No. 623-5302  
Representing City Env. Svc.  
[ ] Phoned Me [X] Was Called [ ] Scheduled Meeting [ ] Unscheduled Meeting  
Other Individuals Involved in Conversation/Meeting Stanley Tam (FOEP)

Summary of Conversation/Meeting Discussed letter sent by Mr Taylor on Oct 1, 1998,  
to store up to 1-yr three roll off containers of solid hazardous waste. We  
identified that City must demonstrate that they will comply with the  
requirements of 264 Subpart I, prior to them being allowed to store haz.  
waste containers (roll off) in excess of their 10-day transfer station limit.  
This modification <sup>to the application</sup> would be subject to a permit fee.

Signature Roger Evans.

File 3-h

23/98

October 1, 1998

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

D.E.P.

OCT - 2 1998

SOUTHWEST DISTRICT  
TAMPA

RE: City Environmental Services of Florida, Inc. FLD 981 932 494  
Hazardous Waste Permit # HO29-263213

Dear Mr. Evans;

Please modify our hazardous waste permit to allow storage of up to three roll off containers of solid hazardous waste. The solid hazardous waste to be stored in the roll offs will not have any free liquids and therefore containment would not be an issue. The waste will be in lined roll off containers which will be closed or tarped when not transferring waste in or out. The quantity stored will be included in the current facility capacity, closure cost, and financial assurances. This is not an increase in capacity.

You may contact me at 623-5302 extension 235, should you have any questions or require any additional information.

Sincerely,




John A. Taylor  
Technical Services Manager

J:\GROUPS\ADMIN\JOHN\ADMIN\WORDPERF\DEPLET3.WPD

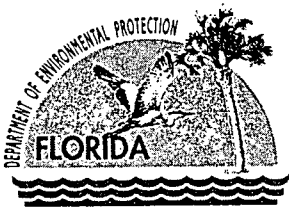


File 3-6

Recycled Paper 

22/98

RECEIVED  
OCT 02 1998  
D  
E  
P



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

September 23, 1998

City Environmental Services, Inc.  
7202 East Eighth Avenue  
Tampa, Florida 33619

Attention: Mr. John Taylor

re: FLD 981 932 494  
Hillsborough County

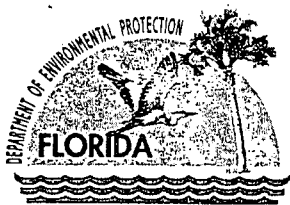
Dear Mr. Taylor:

Per our discussion today, the Department agrees with you that empty paint cans and drums are not hazardous waste when recycled as scrap metal. The containers must meet the RCRA-empty definition in 40 CFR 261.7. All free flowing product must be removed, and no more than one inch (or 3% by weight) of the contents may remain in the container. Recycled scrap metal is exempt under 40 CFR 261.6(a)(3)(iii). If you have any other questions, please call me at 813/744-6100 ext. 383.

Sincerely,

Elizabeth Knauss  
Hazardous Waste Program  
Southwest District

EBK/ebk



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 13, 1998

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

Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida  
Tampa, Florida  
Permit HO29-263213

RECEIVED  
JUL 14 1998

Dear Mr. Taylor:

I reviewed the documents submitted to demonstrate financial responsibility for the HO29-263213 permit transfer from City Environmental Services of Florida, Inc. to USL City Environmental Services of Florida, Inc. The Amwest Surety Insurance Company surety bond, number 1367711, penal sum of \$214,334 covers the Department approved closure estimate. The Hazardous Waste Facility Standby Trust Fund Agreement, entered into as of June 30, 1998, by and between USL City Environmental Services of Florida, Inc., the "Grantor", and Barnett Bank, N.A., the "Trustee", is adequate. Additionally, the Hazardous Waste Facility Certificate of Liability Insurance, policy PLS 8198746, appears to provide the required coverage for third-party bodily injury and property damage arising from sudden accidental occurrences at the site.

USL City Environmental Services of Florida, Inc. is in compliance with Rule 62-730.300(2)(b), Florida Administrative Code, (F.A.C.), and 40 CFR Part 264 Subpart H, as adopted by reference in Rule 62-730.180, F.A.C. If you have any questions, please contact me at (850)488-0300.

Sincerely,

*Ainè Marie Ryan*

Ainè Marie Ryan  
Hazardous Waste Regulation

AMR

cc: Jeff Pallas, EPA  
Roger Evans

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



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 13, 1998

Ms. Terese M. DeClerq  
Corporate Trust Officer  
Michigan National Bank  
27777 Inkser Road  
Farmington Hills, Michigan 48333

Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida,  
a Division of City Management Corporation,  
Tampa, Florida  
Permit HO29-263213  
Standby Trust Fund Agreement

Dear Ms. DeClerq:

In accordance with 40 CFR Part 264.143(a)(11), as adopted by reference in Rule 62-730.180, Florida Administrative Code, we are returning to you for termination the Hazardous Waste Facility Standby Trust Fund Agreement entered into as of October 1, 1997, by and between City Management Corporation, the "Grantor," and Michigan National Bank, the "Trustee". The facility has substituted alternate financial assurance in place of this standby trust fund.

If you have any questions, please contact Ms. Ainè Marie Ryan of my staff at (850)488-0300.

Sincerely,

Satish Kastury, Administrator  
Hazardous Waste Regulation

SK/amr

Enclosure

cc: Jeff Pallas, EPA  
Roger Evans, FDEP  
John Taylor, City Env Svcs



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 13, 1998

Mr. Joseph A. Sprys  
Vice President  
Mid-State Surety Corporation  
76 Kercheval  
Grosse Pointe, Michigan 48236

Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida,  
a Division of City Management Corporation,  
Tampa, Florida  
Permit HO29-263213  
Surety Bond Number 13482

Dear Mr. Sprys:

In accordance with 40 CFR Part 264.143(b)(9), as adopted by reference in Rule 62-730.180, Florida Administrative Code, we are returning to you for cancellation the Hazardous Waste Facility Financial Guarantee Bond, number 13482, effective September 25, 1997, bounding City Management Corporation, the "Principal," and Midwest Surety Corporation, the "Surety". The facility has substituted alternate financial assurance in place of this financial guarantee surety bond.

If you have any questions, please contact Ms. Ainè Marie Ryan of my staff at (850)488-0300.

Sincerely,

Satish Kastury, Administrator  
Hazardous Waste Regulation

SK/amr

Enclosure

cc: Jeff Pallas, EPA  
Roger Evans, FDEP  
John Taylor, City Env Svcs

June 10, 1998

RECEIVED  
JUN 10 1998  
D E P

Mr. Stanley C. Tam, P.E.  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

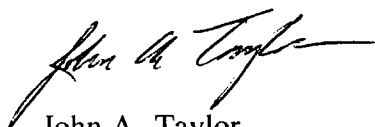
Re: Hazardous Waste Permit H029-263213

Dear Mr. Tam:

In accordance with Florida Administrative Code Rule 62-730.300 concerning change of ownership, this letter is certification that no changes are being made which would require major modification of the existing permit. Enclosed is the processing fee of \$50.00 in accordance with Rule 62-4.050(4)(r)3. Financial responsibility demonstration in accordance with Section 62-730.180 FAC is being completed by US Liquids, Inc. in Houston, Texas. Financial Assurances documentation is expected to be completed for receipt by Ms. Aine Marie Ryan (FDEP Tallahassee) by the end of this week.

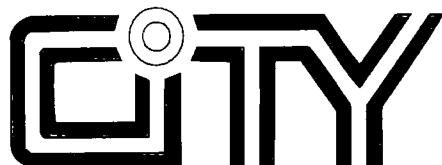
You may contact me at (813) 623-5302, ext. 235 should you have any questions or additional requirements.

Sincerely,



John A. Taylor  
Technical Services Manager

JAT:kp  
Enclosure







# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

May 29, 1998

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

**Re: City Environmental Services, FLD 981 932 494  
Operating Permit No. HO29-263213  
Facility Change of Name**

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) is in receipt of your letter dated May 27, 1998, in which you notified the FDEP of a change of ownership. In accordance with Florida Administrative Code Rule 62-730.300, please submit the following additional items within thirty days:

1. A demonstration that the new owner or operator meets the financial responsibility requirements adopted in Section 62-730.180, FAC. This demonstration shall be submitted to Ms. Aine Marie Ryan (FDEP Tallahassee) and the district notified of the submittal.
2. A certification stating that no changes are to be made which would require major modification of the existing permit.
3. A processing fee of \$50 in accordance with Rule 62-4.050(4)(r)3.

The FDEP will utilize the new name of your company when the requirements of 62-730.300 are met. If you have any questions, please contact me at (813)744-6100, extension 388.

Sincerely,

*REvens.*

Roger Evans  
Permitting Engineer  
Hazardous Waste Section  
Division of Waste Management

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

City\namechange\cesname.doc

May 27, 1998

Mr. Stanley C. Tam, P.E.  
Dept. of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318

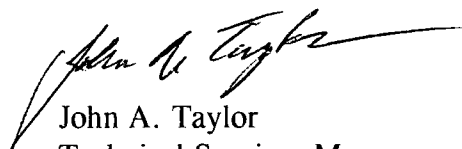
Re: Hazardous Waste Permit No. H029-263213

Dear Mr. Tam:

We are pleased to announce that City Environmental Services, Inc. of Florida is being acquired by US Liquids, Inc. City Environmental Services, Inc. of Florida will become USL City Environmental Services of Florida, Inc.

Please feel free to call me at 813 623-5302, extension 235 if you have any questions.

Sincerely,

  
John A. Taylor  
Technical Services Manager

JAT:kp

**RECEIVED**  
MAY 28 1998

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_





STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
APPLICATION FOR TRANSFER OF PERMIT

**RECEIVED**  
MAY 28 1998  
Department of Environmental Protection  
SOUTHWEST DISTRICT

Permit No. H029-263213 Date Issued July 3, 1995 Date Expires July 3, 2000

## NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: City Environmental Services, Inc. of Florida County: Hillsborough  
Source Location: 2002 North Orient Road City: Tampa, FL 33619  
Permittee Name: John A. Taylor Title: Technical Services Manager  
Mailing Address: 7202 East 8th Avenue  
Tampa, FL 33619

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Hillsborough  
County, Florida  
this 22nd day of May 19 98  
Kathy B Pugh  
Notary Public

John A. Taylor  
Signature of Permittee  
Technical Services Manager  
Title

Date: 5/22/98

My Commission Expires:  
3/2/2001



Kathy B Pugh  
My Commission CC625379  
Expires March 02, 2001

## REQUEST FOR TRANSFER OF PERMIT

Source Name: USL City Environmental Services of Florida, Inc.  
Applicant Name: W. Gregory Orr Title: President  
Mailing Address: 7202 East 8th Avenue  
Tampa, FL 33619 Telephone: (813) 623-5302

Project Engineer: Name: Srinivas G. Rao, Ph.D., P.E.  
Mailing Address: 18545 Otterwood Avenue  
Tampa, FL 33647 Telephone: (813) 973-3850

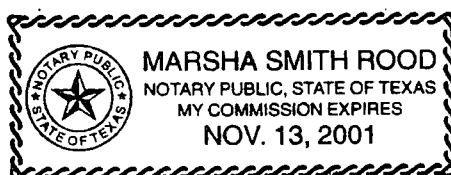
The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. H029-263213 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at HARRIS  
County, US LIQUIDS  
this 26th day of MAY 19 98  
Marsha Smith Road  
Notary Public

W. Gregory Orr  
Signature of Applicant  
PRESIDENT  
Title  
Date: May 26, 1998

My Commission Expires:

\* Attach letter of authorization if other than owner or corporate officer.



APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT  
PART I - GENERAL  
TO BE COMPLETED BY ALL APPLICANTS

Please Type or Print

A. General Information

1. Type of facility:

Disposal	<input type="checkbox"/>		
landfill	<input type="checkbox"/>	land treatment	<input type="checkbox"/>
surface impoundment	<input type="checkbox"/>	miscellaneous units	<input type="checkbox"/>
Storage	<input checked="" type="checkbox"/>		
containers	<input checked="" type="checkbox"/>	tanks	<input type="checkbox"/>
piles	<input type="checkbox"/>	surface impoundment	<input type="checkbox"/>
miscellaneous units	<input type="checkbox"/>		
Treatment	<input checked="" type="checkbox"/>		
tanks	<input type="checkbox"/>	piles	<input type="checkbox"/>
incineration	<input type="checkbox"/>	surface impoundment	<input type="checkbox"/>
miscellaneous units	<input checked="" type="checkbox"/>	boiler/industrial furnace	<input type="checkbox"/>
type of unit	<u>Filter Press</u>	type of unit	<u></u>

2. Type of application: ☐ TOP ☐ construction ☒ operation ☐ closure ☐ RD&D  
☐ construction/operation

3. Revision Number: 01

4. Date current operation began (or is expected to begin): July 1, 1990

5. Facility name: USL City Environmental Services of Florida, Inc.

6. EPA/DEP I.D. No.: FLD 981 932 494

7. Facility location or street address: 2002 North Orient Road, Tampa, FL 33619

8. Facility mailing address: 7202 East 8th Avenue, Tampa, FL 33619  
Street or P.O. Box City State Zip

9. Contact person: John A. Taylor Telephone: ( 813 ) 623-5302

Title: Technical Services Manager

Mailing Address: 7202 East 8th Avenue, Tampa, FL 33619  
Street or P.O. Box City State Zip

10. Operator's name: USL City Environmental Services of Florida, Inc. Telephone: ( 813 ) 623-5302

11. Operator's address: 7202 East 8th Avenue, Tampa, FL 33619  
Street or P.O. Box City State Zip

12. Facility owner's name: USL City Environmental Services of Florida, Inc. Telephone: ( 813 ) 623-5302

13. Facility owner's address: 7202 East 8th Avenue, Tampa, FL 33619  
Street or P.O. Box City State Zip

14. Legal structure: ☒ Corporation ☐ Non-profit Corporation ☐ Partnership ☐ Individual  
☐ Local Government ☐ State Government ☐ Federal Government ☐ Other

15. If an individual, partnership, or business is operating under an assumed name, specify the county and state where the name is registered.

County: \_\_\_\_\_ State: \_\_\_\_\_

16. If the legal structure is a corporation, indicate the state of incorporation.

State of incorporation: Florida

17. If the legal structure is an individual or partnership, list the owners.

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or P.O. Box City State Zip

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or P.O. Box City State Zip

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or P.O. Box City State Zip

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Street or P.O. Box	City	State	Zip
--------------------	------	-------	-----

18. Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased \_\_\_\_\_ years  
☐ presently leased; the expiration date of the lease is: \_\_\_\_\_

**If leased, indicate:**

Land owner's name: USL City Environmental Services of Florida, Inc.

Land owner's address: 7202 East 8th Avenue, Tampa, FL 33619

Street or P.O. Box	City	State	Zip
7202 East 8th Avenue	Tampa	FL	33619

19. Name of engineer: Srinivas G Rao, PhD, PE      Registration no.: 39608 Florida

Address: 18545 Otterwood Avenue, Tampa, FL 33647

Street or P.O. Box	City	State	Zip
18545 Otterwood Avenue	Tampa	FL	33647

Associated with: Engineering and Applied Science, Inc.

20. Facility located on Indian land: ☐ yes ☒ no

- 21. Existing or pending environmental permits: (attach a separate sheet if necessary)**

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
Hazardous Waste Operation HSWA	EPA	FLD 981 932 494	11/6/96	11/1/2006
Solid Waste Transfer	FDEP/EPC	SO29-293321	Pending	
Used Oil Transporter and Collection	FDEP	FLD 981 932 494	3/31/98	6/30/99
Hazardous Waste Transporter and Transfer	FDEP	FLD 981 932 494	1/1/98	1/1/99
Mercury Storage and Transportation	FDEP	FLD 981 932 494	3/1/98	3/1/99

## B. Site Information

1. Facility location County: Hillsborough Nearest Community: Tampa  
Latitude: 27°, 57 min., 49 sec. N. Longitude: 82°, 22 min., 23 sec., W.  
Section: 14 Township: 29S Range: 19E  
UTM #: / / / Brandon N2752.5-W8215/7.5

2. Area of facility site (acres): 1.4 Acres (MOL)

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Also show the hazardous wastes traffic pattern including estimated volume and control. Scale Drawings are included as Attachment 8. Photographs are included as Attachment 6. Traffic flow is included as Attachment 5.7
4. Attach topographic map which show all the features indicated in the instruction sheet for this part. Topographic Map is included as Attachment 10.1
5. Is the site located in a 100-year flood plain? ☐ yes ☒ no  
A Flood Plain Map is included as Attachment 10.6

## C. Land Use Information

1. Present zoning of the site Heavy Industrial. A City of Tampa Zoning Map is included as Attachment 10.3
2. If a zoning change is needed, what should the new zoning be? N/A
3. Present land use of site Permitted Hazardous Waste Facility

## D. Operating Information

1. Is waste generated on site? ☒ yes ☐ no

List the SIC codes (4-digit)

9511 5093 4226 8734

2. Attach a brief description of the facility operation, nature of the business, and activities that generate, treat, store or dispose of hazardous waste.  
Described in General Information.

3. Using the following table and codes provided, specify, (1) each process used for treating, storing, or disposing of hazardous waste (including design capacities) at the facility, and (2) the hazardous waste (or wastes) listed or designated in 40 CFR Part 261, including the annual quantities, to be treated, stored, or disposed by each process at the facility. (See the instructions for the list of process codes and units).

PROCESS CODE	PROCESS DESIGN CAPACITY AND UNITS OF MEASURE	HAZARDOUS WASTE CODE	ANNUAL QUANTITY OF HAZARDOUS WASTE AND UNITS OF MEASURE

Hazardous waste process codes are listed on Attachment 2.



**P. Information Regarding Potential Releases From Solid Waste Management Units**

Facility name: USL City Environmental Services of Florida, Inc.  
 EPA I.D. Number: FLD-981 932 494  
 Location: City Tampa  
 State Florida 33619

1. Are there any of the following solid waste management units (existing or closed) at your facility? A Solid Waste Management Unit (SWMU) is a discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released, as described in the July 27, 1990 Federal Register (55 FR 30798).

NOTE: DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	YES	NO
■ Landfill	<u>      </u>	<u>X</u>
■ Surface impoundment	<u>      </u>	<u>X</u>
■ Land farm	<u>      </u>	<u>X</u>
■ Waste pile	<u>      </u>	<u>X</u>
■ Incinerator	<u>      </u>	<u>X</u>
■ Storage tank	<u>      </u>	<u>X</u>
■ Container storage area	<u>      </u>	<u>X In Part B</u>
■ Injection wells	<u>      </u>	<u>X</u>
■ Wastewater treatment units	<u>      </u>	<u>X</u>
■ Transfer stations	<u>      </u>	<u>X In Part B</u>
■ Waste recycling operations	<u>      </u>	<u>X In Part B</u>
■ Land treatment facility	<u>      </u>	<u>X</u>
■ Boiler/industrial furnace	<u>      </u>	<u>X</u>
■ Other (any units not listed above)	<u>      </u>	<u>X In Part B</u>

SWMUs are described in the SWMU Section.  
 SWMUs are listed in Attachments 5.14 and 14.

2. If there are "Yes" answers to any of the items in 1. above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, and location at facility. Provide a site plan if available.

N/A

NOTE: HAZARDOUS WASTES ARE THOSE IDENTIFIED IN 40 CFR PART 261. HAZARDOUS CONSTITUENTS ARE THOSE LISTED IN APPENDIX VIII OF 40 CFR PART 261.

3. For the units noted in 1. above and also for those hazardous waste units in your Part B application, please describe for each unit all data available on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information:

- Date of release
- Type of waste released
- Quantity or volume of waste released
- Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No releases of hazardous waste or constituents to the environment

Revision 01  
Date 5/21/98  
Page 3 of 3

4. In regard to the prior releases described in 3. above, please provide (for each unit) all analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or ground water.

NA

### Signature and Certification

The following certification must be included with the submittal of this information. The certification must be signed by a principal executive officer of at least the level of Vice President or by a duly authorized representative of that person.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments. Based on my inquiry of those individuals immediately responsible for obtaining the information, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

USL City Environmental Services of Florida, Inc.

W Gregory Orr  
Signature

W GREGORY ORR, President  
Name and Title (typed)

USL City Environmental Services of Florida Inc.  
Facility Name

Date: 5-26-98 Telephone: (281) 272-4508

APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT  
CERTIFICATION  
TO BE COMPLETED BY ALL APPLICANTS

Facility Name: USL City Environmental Services of Florida, Inc. EPA ID# FLD 981 932 494

1. Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 17-730, F.A.C., and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.

USL City Environmental Services of Florida, Inc.

W Gregory Orr  
Signature of the Operator or Authorized Representative\*

W GREGORY ORR, PRESIDENT  
Name and Title (Please type or print)

Date: 5-26-98 Telephone: (881) 272-4508

## 2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Protection.

  
USL City Environmental Services of Florida, Inc.

\_\_\_\_\_  
Signature of the Facility Owner or Authorized Representative\*

W. GREGORY ORR, PRESIDENT


Name and Title (Please type or print)

Date: 5-26-98 Telephone: (281) 272-4508

\*Attach a letter of authorization

## 3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. For hazardous waste disposal facilities, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR §264.119 and §265.119, as adopted by reference in Chapter 17-730, F.A.C.

  
USL City Environmental Services of Florida, Inc.

\_\_\_\_\_  
Signature of the Land Owner or Authorized Representative\*

W. GREGORY ORR, PRESIDENT

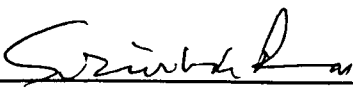
Name and Title (Please type or print)

Date: 5-26-98 Telephone: (281) 272-4508

\*Attach a letter of authorization

4. Professional Engineer Registered in Florida [Complete when required by Chapter 471, F.S. or not exempted by Rule 17-730.220(7), F.A.C.]

This is to certify that the engineering features of this hazardous waste management facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

  
\_\_\_\_\_  
Signature

Srinivas G. Rao  
\_\_\_\_\_  
Name (please type)

Florida Registration Number: 39608

Mailing Address: Engineering and Applied Science, Inc.  
18545 Otterwood Avenue  
Tampa, FL 33647  
\_\_\_\_\_  
City State Zip

Date: 2/29/96 Telephone( 813 ) 973-3850

[PLEASE AFFIX SEAL]



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

April 29, 1998

Mr. John A. Taylor  
Technical Services Manager  
City Environmental Services  
7202 East Eighth Avenue  
Tampa, Florida 32319

RE: City Environmental Services, FLD 981 932 494  
Operating Permit H029-263213

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) is in receipt of your letter, dated April 15, 1998, which requested clarification of Specific Condition 17.c of the referenced operating permit. As discussed in our telephone conversation on April 27, 1998, the Department will modify the Specific Condition 17.c to alleviate any misinterpretation.

Should you have any other questions or comments, please do not hesitate to contact me at (813)744-6100, extension 388.

Sincerely,

Roger Evans  
District Permitting Engineer  
Hazardous Waste Section  
Division of Waste Management

vol.III/ citylet.doc

April 15, 1998

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

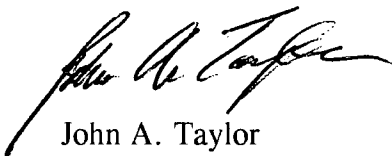
Dear Mr. Evans:

The purpose of this letter is to clarify Specific Condition 17.c. of the Hazardous Waste Permit (HO29-263213) for City Environmental Services, Inc. of Florida (FLD 981 932 494).

Upon further review of this permit, it appears the condition may be interpreted as limiting inbound (unloaded) waste to 10,000 gallons or less at any one time. The original intent of the permit condition was to limit inbound (unloaded) waste **which is not counted toward the maximum capacity of the Facility** (see Specific Condition 17.b.).

You may contact me at (813) 623-5302, ext. 235 should you need any additional information or have any questions.

Sincerely,




John A. Taylor  
Technical Services Manager

JAT:kp

RECEIVED  
APR 20 1998

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_



file: 3-h  
15/98  
Recycled Paper 



CITY ENVIRONMENTAL SERVICES INC. OF FLORIDA SOLID WASTE MANAGEMENT CONTAINMENT CALCULATIONS					
CONTAINMENT	LENGTH FT.	WIDTH FT.	DEPTH FT.	CAPACITY CU. FT.	CAPACITY GALLONS
WAREHOUSE SUMP # 1	8.5	3.5	4.5	133.9	1001
WAREHOUSE SUMP # 2	8.5	3.5	4.5	133.9	1001
WAREHOUSE SUMP # 3	8.5	3.5	4.5	133.9	1001
WAREHOUSE SUMP # 4	8.5	3.5	4.5	133.9	1001
WAREHOUSE SUMP # 5	8.5	3.5	4.5	133.9	1001
WAREHOUSE TOTAL				669.4	5005
WEST OF TRENCH (AREA 1)	82.0	30.0	1.04	1279.2 ✓	✓9568
EAST OF TRENCH # 1 (AREA 2)	82.0	20.0	0.83	1361.2 ✓	✓10182
EAST OF TRENCH # 2 (AREA 3)	82.0	20.0	0.21	172.2 ✓	✓1288
TRENCH	82.0	0.3	0.4	9.8 ✓	77.3 ✓ 74
6 IN. PIPE	57.0	0.5	0.5	11.2 ✓	22.8 84
ELEVATED TRENCH <i>rectangle 3</i>	20.0	0.3	0.4	2.4	18
SUMP	9.3	3.9	3.7	134.2	1004
PROCESSING TOTAL				2970.2	22217
TOTAL (BOTH)				3639.6	27222

$102' \times 40' =$   
 $4080 \text{ ft} \times 1" \text{ rain} =$   
 $4080 (1 \text{ in}) \left( \frac{\text{ft}}{12 \text{ in}} \right) =$   
 $340 \text{ ft} \left( \frac{7.48 \text{ ft}}{2 \text{ ft}} \right) =$   
2543.2 1  
 rainfall  
  
 100,000 gal  
 in  
 "Temporary"  
 and "processing"

Figure 21

April 10, 1998 revision

Document 2

Storage Location	Maximum Quantity
Warehouse	50,000 gallons
Processing area	50,000 gallons
Temporary staging	50,000 gallons
Total	150,000 gallons

06

417 tons of dirt

$$417(2000) = 834,000 \text{ lb} \left( \frac{\text{cf}}{100 \text{ lb soil}} \right) \left( \frac{7.48 \text{ gal}}{\text{cf}} \right) = 62,365 \text{ gal}$$

$$417(2000) = 834,000 \text{ lb} \left( \frac{\text{gal}}{62.4 \text{ lb}} \right) = 13,365 \text{ gal}$$

with



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

November 17, 1997

Mr. Joseph D. Veach  
Accounting Manager  
City Environmental, Inc.  
1923 Frederick Street  
Detroit, Michigan 48211

**RECEIVED**  
NOV 19 1997  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida  
Tampa, Florida  
Permit H029-263213

Dear Mr. Veach:

I reviewed the documents submitted to the Department to demonstrate financial responsibility and find them in order. The Mid-State Surety Corporation Financial Guarantee Bond, surety bond number 13482, effective September 25, 1997, with penal sum of \$212,334 adequately covers the Department approved closure estimate. The Hazardous Waste Facility Standby Trust Fund Agreement, entered into as of October 1, 1997, by and between City Management Corporation, the "Grantor," and Michigan National Bank, the "Trustee," is also adequate. Additionally the Hazardous Waste Facility Certificate of Liability Insurance, policy number PLS 819 46 35, effective September 1, 1997, appears to meet sudden liability requirements.

City Environmental Services, Inc. of Florida is in compliance with the financial requirements of 40 CFR Part 264 Subpart H, Florida Administrative Code. If you have any questions, please contact me at (850)488-0300.

Sincerely,

*Ainè Marie Ryan*

Ainè Marie Ryan  
Hazardous Waste Regulation

AMR

cc: Jeff Pallas, EPA  
Bill Crawford



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

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

November 4, 1997

**RE: City Environmental Services, FLD 981 932 494  
Operating Permit HO29-263213  
Use of One Time Land Disposal Restriction Notifications**

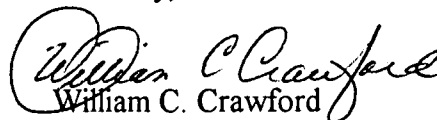
Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) has received your letter dated August 22, 1997 regarding Land Disposal Restriction (LDR) changes finalized in 62 FR 25998 which became effective at the Federal level on August 11, 1997. The letter stated that the revised regulations would allow City to utilize a one time LDR notice to the receiving treatment, storage and disposal facility (TSDFs). Further, the letter indicated that City would like to implement the use of these one time notices immediately.

Since the FDEP has not adopted Phase IV LDRs of May 12, 1997 final rule (62 FR 25998-26040), the FDEP will continue to require generators and TSDFs to provide LDR notifications with each shipment of hazardous waste to the receiving TSDF. The FDEP is considering adoption of the Phase IV LDRs in early 1998.

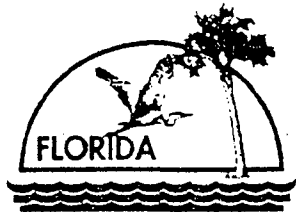
Should you have any question, please contact Beth Knauss or myself at 813-744-6100 ext. 383 or 372.

Sincerely,



William C. Crawford  
Permitting Engineer, Southwest District  
Hazardous Waste Regulation

b:\city\263212\11-4-96.doc



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 8, 1997

Mr. Joseph A. Kotlinski  
Clean Harbors, Environmental Services, Inc.  
1501 Washington Street  
P.O. Box 850327  
Braintree, MA 02185-0327

RECEIVED  
OCT 13 1997  
D E P

RE: Changes to the Land Disposal Restriction (LDR) Notification Requirements

Dear Mr. Kotlinski:

The Florida Department of Environmental Protection (FDEP) Hazardous Waste Regulation Section has received your letter dated July 10, 1997, regarding United States Environmental Protection Agency's (USEPA) final rule dated May 12, 1997, concerning the Phase IV LDRs (62 FR 25998-26040). In your letter it was stated that as part of that rule, USEPA amended the LDR notification requirements to allow generators to submit a one-time LDR notification to the treatment, storage or disposal facility (TSDF), rather than requiring a LDR notification with each shipment of hazardous waste to the TSDF and Clean Harbors would like to know whether the Florida State will allow one-time LDR notifications as described in May 12, 1997, rule or it will continue to require generators to provide LDR notifications with each shipment of hazardous waste to the TSDF?

Since the FDEP has not adopted Phase IV LDRs of May 12, 1997, final rule (62 FR 25998-26040), the FDEP will continue to require generators to provide LDR notifications with each shipment of hazardous waste to the TSDF. We are considering adoption of Phase IV LDRs in early 1998.

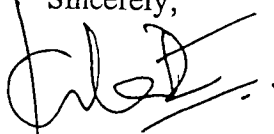
Mr. Joseph A. Kotlinski  
Clean Harbors, Environmental Services, Inc.  
Page Two

If you have any questions please call Mike Redig, Subra Putcha or Mahnaz Massoudi in the Hazardous Waste Regulation Section at (904) 488-0300.

**Disclaimer:**

Information in this guidance document is provided by Florida Department of Environmental Protection (FDEP), Hazardous Waste Regulation Section in response to an inquiry submitted by your office. This information is of a general nature and may not apply to a particular set of facts or circumstances and should not be used as a statewide guidance. The interpretations of State and Federal regulations with respect to your inquiry are made to the best of our knowledge and belief. If you have a case specific question/situation, it is advisable to submit a detailed inquiry with supporting documentation.

Sincerely,



Satish Kastury  
Environmental Administrator  
Hazardous Waste Regulation Section

SK/mm

CC: Subra Putcha, FDEP-EWR  
Susan Horlick, FDEP-HWR  
David Crowley, FDEP-OGC  
District Waste Program Administrators  
District Technical Committee Members  
Reading File

we ✓ ✓  
RE ✓

# 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: Mr. William Kutash - (813) 744-6084

FROM: Thomas K. Maurer

DATE: October 6, 1997

TIME: 4:08pm

NUMBER OF PAGES, INCLUDING COVER SHEET: 8

CLIENT/MATTER NUMBER: 021941-0102

COMMENTS/SPECIAL INSTRUCTIONS:

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

file: 3-4  
11/97

# FOLEY & LARDNER

ATTORNEYS AT LAW

CHICAGO  
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ORLANDO, FLORIDA 32801-2384  
TELEPHONE (407) 423-7656  
FACSIMILE (407) 648-1743

SAN DIEGO  
SAN FRANCISCO  
TALLAHASSEE  
TAMPA  
WASHINGTON D.C.  
WEST PALM BEACH

WRITER'S DIRECT LINE

October 6, 1997

William Kutash  
Waste Management Program Manager  
Florida Department of  
Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218

**Re: *City Environmental Services, Inc. of Florida - Solid Waste  
Management Permit Intent to Issue - Permit No. S029-293321***

Dear Bill:

Thank you and your staff for meeting with City Environmental Services, Inc. of Florida ("City") to discuss the proposed solid waste permit. City was pleased with the cooperative nature of the meeting and believed that we made good progress towards achieving a solid waste management permit for the facility which addresses the Department's concerns but which also allows the facility to operate in a reasonable manner.

In order to keep communications open, we felt that it would be valuable for us to write to you summarizing our understanding of the discussions at the meeting. Clearly neither the Department nor City agreed to any final language for permit conditions. However, we do believe that a general understanding of how we were going to proceed was reached and the Department will be incorporating this into a new draft permit for discussion purposes. The following is our understanding of the discussions regarding the pertinent specific conditions.

- City suggested that the description of the facility be changed to Materials Processing and Transfer Facility. DEP did not have a problem with this change.
- Specific Condition 1.a.(2) ("SC"). City proposed an alternative definition for impervious surface. DEP indicated that while they may have some suggested changes to the alternative definition, the concept of the change appeared to be acceptable.

ESTABLISHED 1842

A MEMBER OF GLOBALEX WITH MEMBER OFFICES IN BERLIN, BRUSSELS, DRESDEN, FRANKFURT, LONDON, PARIS, SINGAPORE, STUTTGART AND TAIPEI

800/2002008

FOLEY & LARDNER

407 648 1743

16:23

10/06/97



- SC 1.a.(3). City proposed an alternate definition for non-RCRA regulated materials. DEP did not indicate any concerns with the proposed alternative definition.
- SC 1.a.(6). City suggested the use of the term "processing" as defined in Rule 62-701.200(62). The difference between bulking and recontainerizing and mixing waste, versus treating or physically changing the waste was discussed. A consensus was reached that it would be better to address this issue through the inclusion of conditions governing the process and procedures which applied to processing activities rather than by including limitations in the definition.
- SC 1.b. City expressed strong concerns regarding the limitations placed on the type of waste streams to be handled at the facility by this proposed condition. The Department's concern related to the facility's procedures for handling materials which were not hazardous waste but still posed hazards to public health or the environment. After considerable discussions regarding the operational practices and procedures used by City regarding these types of waste, DEP agreed to attempt to write specific permit conditions regarding the procedures and operations of requirements for waste management, rather than to include limitations on the type of waste streams (other than those wastes which the facility has indicated it will not be handling and certain categories of special waste such as used oil, mercury containing devices, white goods, etc.)
- SC 1.f. City expressed concerns regarding the exclusion of household hazardous waste from both the hazardous waste permit and the solid waste permit and the desire to maintain the flexibility to handle household hazardous waste as solid waste. The inclusion of household hazardous waste in the solid waste permit, as well as the permit condition specifying procedures which would be used with regard to such waste was discussed and DEP agreed to draft a proposed condition.
- SC 1.g. A discussion was held regarding the difference between mixing and processing versus treatment such as stabilization. City indicated that the goal of mixing waste materials as set forth in the permit application was only to solidify or remove liquid to allow the disposal of the material at appropriately permitted facilities. Any change to the physical or chemical characteristics of the waste would be incidental to the removal of liquids. City is not making any claims regarding the efficacy of the mixing process with regard to the elimination of any specific waste characteristics. DEP may include some language to clarify the purpose of the mixing but indicated that with such clarification this condition could be changed to allow solidification and mixing at the facility.

- SC 1.h. City already has authority to operate the paint can crusher and aerosol puncturing equipment under its hazardous waste permit and is seeking the same authority for solid waste. A question concerning the inclusion of information regarding the paint can crusher was raised. City will review the permit application and provide any needed additional information regarding the paint can crusher. DEP may incorporate conditions similar to the hazardous waste permit regarding the operation of these units but will draft a permit condition which would allow their use under the solid waste permit.
- SC 3.b. The discussion regarding mixing versus stabilization was referenced regarding this condition. The Department will prepare a permit condition which allows solidification mixing to remove liquids but does not include treatment which would change other specific waste characteristics.
- SC 6.c. City objected to prior specific approval from an intended disposal facility. City will follow its waste analysis plan and will only send material to facilities which are permitted to accept a particular type of waste. However, City does not want to be burdened by obtaining a separate individual approval for each shipment. City discussed its waste analysis plan and sampling procedures. Each load which leaves the facility is tested per the Water Analysis Plan. After this discussion, DEP agreed to modify this condition to eliminate the need for prior specific approval. *What are the sampling procedures for out going shipments?*
- SC 6.d. A discussion was held regarding the appropriate limitations on processing when equipment fails or needs repair. DEP expressed the concern regarding accumulation of waste material during the time period when processing equipment was unavailable. City pointed out that giving the space limitations at their facility and the economic incentives for prompt movement of waste through the facility, that this was not a practical concern. DEP will attempt to rewrite this specific condition to either require that waste be managed without using any inoperable equipment or to limit the acceptance of waste material which will require processing when the equipment necessary to process such waste is inoperable.
- SC 6.f. City does not propose to process or mix asbestos at the facility. However, City may repackage, consolidate or recontainerize asbestos. City proposed a permit condition referencing applicable OSHA and air requirements for these operations. DEP will review the proposed condition for inclusion in the next draft.

- SC 6.h. City expressed concerns that this condition was overbroad in that there are many aspects of the hazardous waste permit which would not apply to the solid waste permit, including the federal HSWA requirements, hazardous waste and disposal restrictions, waste manifests requirements, and other matters. While many aspects of the facility's operations are very similar for solid waste, including contingency plan, personnel training and waste analysis plan, there are enough differences between the two that this condition creates a problem. DEP indicated that this language was taken from the permit application. City will review the application and provide appropriate changes regarding this condition, if necessary. DEP agreed that the condition was overbroad and will make appropriate changes in the next draft.
- SC 7.a. City explained that the use of the term "hazardous substance" as limitation on waste streams set forth in this condition would eliminate many waste streams and provide unreasonable restrictions on the facility's operation. Another discussion regarding DEP's concern about the management of materials which are not regulated as hazardous waste but which still pose threats to human health and the environment. DEP will attempt to draft permit conditions regarding operational practices and procedures for such wastes but will remove restrictions on the acceptance of particular waste streams. City suggested use of the term hazardous characteristics as defined in the hazardous waste regulations since this term has a clear definition.
- SC 7.b. The parties discussed the use and need for generator knowledge in the Waste Analysis Plan used by the facility. City has a strong incentive to require accurate characterization by the generator since the facility can charge higher rates for hazardous waste and must pay higher costs for off-site shipment of hazardous waste. Further, each shipment leaving the facility is tested per the Waste Analysis Plan. Based on this explanation and discussion, DEP will allow the use of generator knowledge and MSDS sheets as set forth in the waste analysis plan.
- SC 7.c(2). City suggested that records be maintained at the facility for a minimum of three years. DEP agreed to include this limitation.
- SC 7.c(3). City requested that the words "analytical results were received" be changed to "waste profile was approved" per the Waste Analysis Plan since not all materials coming to the facility receive analytical results. There was a discussion of the confirmation process under the waste analysis plan and how that confirmation process applied when there were no specific analytical results. Even where there are no actual results, the waste stream must be evaluated annually in

see comments  
SC 7.c

terms of the waste analysis plan finger printing, the analysis of outbound shipments, and any discrepancies in the waste profile.

- SC 7.c(4). City requested that the term "prior to acceptance at the facility" be deleted and that the procedures set forth in the waste analysis plan be followed.
- SC 7.d(2). The Department agreed to change this condition to limit its applicability to waste sent to in-state facilities.
- SC 8.b and f. The Department agreed to modify these permit conditions to provide that the containers/vehicles, etc., will be "constructed of or" lined with materials which are compatible with the wastes.
- SC 8.e. City requested that the second sentence be deleted and replaced with the phrase "or on inbound or outbound shipments". The Department did not express any concerns with this proposed change.
- SC 9.b. City has a problem with this condition in that it is not practicable or possible to remove all liquids while material remains in containers. DEP will draft a condition which requires that measures be taken to minimize any spillage or release during transfer operations where liquids are present in containers.
- SC 11. City expressed concerns regarding the units of measures since inbound shipments can be received in a variety of measurements, including tons, pounds, cubic yards, kilograms, metric tons, cubic meters, gallons or liters. City is also concerned that a material balance is not possible for this type of facility given the differences in reporting, units of measures, and range of error in conversion factors. City also felt that having the records available for inspection by the Department should be acceptable rather than actual quarterly submission. DEP indicated that it would change the conditions to provide greater flexibility for units of measure on inbound shipments but that the Department would require a consistent reporting on outbound shipments and would require quarterly reports. The Department indicated that the format for the quarterly reports would be basic and simple, that a material balance would not be required, and that the frequency of reporting could be decreased to a less frequent basis in the future. DEP will rewrite this condition to reflect these changes.
- SC 11.b(6). City will follow appropriate quality assurance measures but a Quality Assurance Plan is not required under the rules. Therefore, this condition will be changed.

The QA section has or is developing generic procedures that these type jobs can agree to follow.

- SC 12. City explained that these conditions were impossible to meet since the term "liquids" includes any moisture from rainwater condensation or other sources. City agreed with the Department that any leachate or waste should not be present on floors surface areas and that waste and leachate should be collected in the processing area or the sump and should not be permitted to enter into the stormwater facility. The Department expressed its concern regarding the ability of inspectors at the facility to distinguish between rainwater and waste materials. DEP also expressed concerns regarding maintenance of the surface areas to eliminate ponding and collection of liquids on the surface. DEP indicated that their concern primarily related to the processing area of the facility. DEP will attempt to draft new permit conditions which require minimizing the presence of liquids, maintenance of the processing area, and management practices to insure that any release of waste material or leachate is minimized and properly handled if it should occur. One measure would include requiring City to handle all materials, including water, in the processing area as a solid waste in the event of any discharge.
- SC 14. City requested that the due date for submission closure costs be within ninety days of the end of each fiscal year. City will also review its hazardous waste and solid waste financial assurance in order to determine whether there is any double counting between the two.
- SC 15. City requested that the term "which may result in harm to human health or the environment" be placed after the word "systems" in the second sentence in order to provide some reasonable threshold to the types of occurrences which would trigger notice. The Department agreed to include this or some other comparable de minimus threshold in this condition.
- SC 17. This provision involves the same issues regarding liquids and the stormwater management system discussed under SC 12 above. The Department will attempt to draft a permit condition as discussed under SC 12 above.
- Attachment 1. These specific conditions would be changed to reflect submittal due date changes which may be made to *Condition 11.c and 14.a.*
- Attachment 2. DEP indicated that the capacity limitations are based on the permit application and the physical limitations of the facility. City indicated that they did not agree that the physical limitations of the facility would result in these capacity limits. John Taylor and Susan Pelz will meet to discuss this issue and attempt to reach a resolution regarding the appropriate capacity for the facility.

William Kutash  
October 6, 1997  
Page 7

In the event the capacity is less, City may submit the appropriate changes to the financial assurance documents to reduce the cost estimates accordingly.

This summary was taken from our notes regarding the meeting and it is our best attempt to accurately reflect our discussions. If you have any significant changes or disagreements with this summary, please let us know as soon as possible. We look forward to receiving a working draft of the revised permit conditions. Please let us know when you expect the draft to be completed. As indicated at the meeting, our current extension of time in which to file a petition expires on November 1 and we will need to request an additional extension if necessary. Again, we wish to thank the Department for their cooperation and invite you or any of your staff to contact us with any questions or to request any assistance in developing additional permit language which you may need.

Sincerely,



Thomas K. Maurer

TKM/jh

cc: Terry Muse  
John Taylor  
Susan Johnson

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

## DISTRICT ROUTING SLIP

To: Bill Crawford DATE: \_\_\_\_\_

CC To: \_\_\_\_\_

	<b>PENSACOLA</b>	<b>NORTHWEST DISTRICT</b>	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Sopchoppy	Northwest District Satellite Office	
X	<b>TAMPA</b>	<b>SOUTHWEST DISTRICT</b>	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	<b>ORLANDO</b>	<b>CENTRAL DISTRICT</b>	
	Melbourne	Central District Satellite Office	
	<b>JACKSONVILLE</b>	<b>NORTHEAST DISTRICT</b>	
	Gainesville	Northeast District Branch Office	
	<b>FORT MYERS</b>	<b>SOUTH DISTRICT</b>	
	Marathon	South District Branch Office	
	<b>WEST PALM BEACH</b>	<b>SOUTHEAST DISTRICT</b>	
	Port St. Lucie	Southeast District Branch Office	

☐ Reply Optional  
Date Due: \_\_\_\_\_

☐ Reply Required  
Date Due: \_\_\_\_\_

☒ Info Only

Comments:

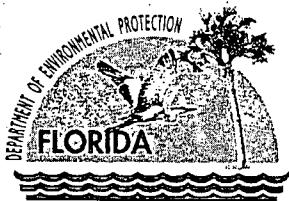
City Environmental Services  
must resubmit liability

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From: \_\_\_\_\_

Tel.: \_\_\_\_\_



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

August 28, 1997

CERTIFIED LETTER Z 751 709 866

Mr. Michael L. Piesko  
Chief Financial Officer  
City Management Corporation  
3400 East Lafayette  
Detroit, Michigan 48207

Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida  
Tampa, Florida  
Permit H029-263213

Dear Mr. Piesko:

Pursuant to a U.S. Environmental Protection Agency audit conducted in the Tallahassee, Florida, offices during the week of July 14, 1997, City Environmental Services' Hazardous Waste Facility Certificate of Liability Insurance has been deemed incomplete. Please complete and resubmit the enclosed Department form 62-730.900(4)(k) within thirty (30) days receipt of this letter. Alternatively, you may comply with the sudden liability requirements of 40 CFR Part 264.147, as adopted by reference in Rule 62-730.180, Florida Administrative Code, by providing another Department approved financial mechanism.

If you have any questions, please contact me at (850)488-0300.

Sincerely,

*Ainè Marie Ryan*

Ainè Marie Ryan  
Hazardous Waste Regulation

AMR

Enclosure

cc: Jeff Pallas, EPA  
Bill Crawford

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

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file: 3-h  
10/97



August 22, 1997

**RECEIVED**  
AUG 26 1997

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

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

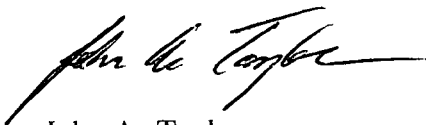
Dear Mr. Crawford:

The Land Disposal Restrictions (LDR) changes finalized in 62 FR 25998 became effective on August 11, 1997. One of these changes was a significant reduction in LDR paperwork. LDR notices which were previously required to accompany each shipment of each type of hazardous waste are now required on a one-time basis.

City Environmental Services, Inc. of Florida (CESF) proposes to begin implementation of this one-time-only notification immediately in anticipation of Florida incorporating these revisions. The revisions would apply to both inbound and outbound shipments of hazardous wastes. The notification would address all aspects of the LDR for each waste code of each waste stream. An updated or revised LDR notification would be utilized each time a change in the waste stream causes a change in LDR requirements. There will be no change in the adherence to the LDR program requirements other than a reduction in overburdensome paperwork. No modification of our permit is required to implement this revision.

Thank you in advance for your prompt assistance in this matter. You may contact me at (813) 623-5302, ext. 235 to discuss this issue.

Sincerely,



John A. Taylor  
Technical Services Manager

JAT:kp

Enclosures: Current CESF LDR Forms



# **City Environmental Services, Inc. of Florida (CESF)**

## **Land Disposal Restriction (LDR) Notification Form**

City Environmental Services Inc. of Florida (CESF) is pleased to offer generators the following set of Land Disposal Restriction (LDR) notification forms, which will assist them in meeting their obligation defined in 40 CFR 268.7 to provide written notification to the receiving treatment, storage, or disposal facility (TSDF) of all shipments of hazardous waste subject to LDR. Instructions to ensure successful completion of this form are as follows:

1. Enter the **generator name** exactly as it appears in section three of the corresponding manifest. The generator address is not required.
2. Enter the **generator US EPA identification number** and **manifest document number** exactly as they appear in section one of the corresponding manifest.
3. Enter the **manifest page number(s)** and **line item(s) letters** in column one of the table.
4. In column two, enter the **EPA hazardous waste code** which corresponds to the manifest line item entered in column one. **Please enter only one waste code per line.**
5. Mark each line entry as either **wastewater (ww; column 3a)** or **non-wastewater (nww; column 3b)**. A wastewater is defined as having less than one percent by weight total organic carbon and less than one percent by weight total suspended solids.
6. List any applicable **subcategories** in column four. A listing of waste codes with subcategories has been attached for reference. If no subcategories apply, enter "None" in column four.
7. List all **F001-F005 constituents** in column five for F001-F005 wastes. A table listing all UHCs and their universal treatment standards (UTS) has been attached for reference. Enter in column five the numbers (from 1 to 258) from the UHC table which correspond to the F001-F005 constituents present. Write "NA" if the waste is not F001-F005 and F001-F005 constituents do not apply to the waste.
8. List all **underlying hazardous constituents (UHCs)** in column six for all wastes carrying D001 (except D001 wastes where treatment by CMBST or RORGS is specified on the LDR or high-TOC subcategory D001 wastes), D002, D003 (except reactive cyanides and emergency response explosives), D012-D017 (except wastewaters), or D018-D043 waste codes. These wastes must be treated in accordance with 40 CFR 268.48 prior to land disposal. D001, D002, D003, and D012-D043 wastes which are managed in CWA/CWA-equivalent/Class I SDWA systems do not need UHCs listed. A table listing all UHCs and their universal treatment standards (UTS) has been attached for reference. Enter in column six the numbers (from 1 to 258) from the UHC table which correspond to the UHCs present. Write "None" if no UHCs are present in the waste. Write "NA" if UHCs do not apply to the waste. The subcategory table summarizes which characteristic wastes need UHCs listed.
9. Enter **only one** of the six choices described at the bottom of page one of the LDR form in column seven.
10. List the manifest line item numbers for all wastes subject to "California List" regulations in the small table in the middle of page one.
11. Print name, title, and date at the bottom of page one, and sign.

**City Environmental Services, Inc. of Florida (CESF)**  
**LDR Subcategory List**

Waste Code	Subcategories	Abbreviation	List UHCs
<b>D001</b>	High TOC ignitable characteristic liquids (greater than or equal to 10% TOC)	high TOC	N/A
	Ignitable characteristic wastes managed in CWA systems	CWA	N/A
	Ignitable characteristic wastes treated by CMBST or RORGS	CMBST or RORGS	N/A
	Ignitable characteristic wastes managed in non-CWA systems	non-CWA	List UHCs
<b>D002</b>	Corrosive characteristic liquids managed in CWA systems	CWA	N/A
	Corrosive characteristic liquids managed in non-CWA systems	non-CWA	List UHCs
<b>D003</b>	Reactive sulfides (40 CFR 261.23 (a) (5))	sulfides	List UHCs
	Explosives (40 CFR 261.23 (a) (6) (7) (8))	explosives	List UHCs
	Emergency Response explosives	E.R. explosives	N/A
	Other reactives (40 CFR 261.23 (a) (1))	other reactives	List UHCs
	Water reactives (40 CFR 261.23 (a) (2) (3) (4))	water reactives	List UHCs
	Reactive cyanides (40 CFR 261.23 (a) (5))	cyanides	N/A
	Reactive wastes managed in CWA systems	CWA (list subcategory)	N/A
<b>D006</b>	Characteristic of toxicity of cadmium	characteristic	N/A
	Cadmium containing batteries	batteries	N/A
<b>D008</b>	Characteristic of toxicity of lead	characteristic	N/A
	Lead acid batteries	batteries	N/A
<b>D009</b>	High mercury-organic non-wastewaters w/greater than or equal to 260 ppm total Hg	high merc. - org.	N/A
	High mercury-inorganic non-wastewaters w/greater than or equal to 260 ppm total Hg	high merc. - inorg.	N/A
	Low mercury-inorganic non-wastewaters w/less than 260 ppm total Hg	low merc.	N/A
<b>D012-</b>	Wastewaters	WW	N/A
<b>D017</b>	Non-wastewaters	NWW	List UHCs
<b>D018-</b>	Characteristic wastes managed in CWA systems	CWA	N/A
<b>D043</b>	Characteristic wastes managed in non-CWA systems	non-CWA	List UHCs
<b>F025</b>	Light ends	light ends	N/A
	Spent filters/aids and desiccants	spent	N/A
<b>K006</b>	Anhydrous	anhydrous	N/A
	Hydrated	hydrated	N/A
<b>K069</b>	Calcium sulfate (low lead)	low lead	N/A
	Non calcium sulfate (high lead)	high lead	N/A
<b>K071</b>	Non-wastewaters from RMERC	from RMERC	N/A
	Non-wastewaters not from RMERC	not from RMERC	N/A
<b>K106</b>	Non-wastewaters w/greater than or equal to 260 ppm total Hg	high merc.	N/A
	Non-wastewaters w/less than 260 ppm total Hg which are RMERC residues	RMERC residues	N/A
	Non-wastewaters w/less than 260 ppm total Hg which are not RMERC residues	not RMERC residues	N/A
<b>P047</b>	4,6-Dinitro-o-cresol	4,6-Dinitro-o-cresol	N/A
	4,6-Dinitro-o-cresol salts	salts	N/A
<b>P065</b>	Non-wastewaters w/less than 260 ppm total Hg which are RMERC residues	low merc. RMERC	N/A
	Non-wastewaters, at least 260 ppm total Hg; RMERC or incinerator residues	high merc. RMERC or INCIN	N/A
	Non-wastewaters w/less than 260 ppm total Hg which are incinerator residues	low merc. incinerator	N/A
	Non-wastewaters w/any levels of Hg which are not RMERC or incinerator residues	not RMERC or INCIN	N/A
<b>P092</b>	Non-wastewaters w/less than 260 ppm total Hg which are RMERC residues	low merc. RMERC	N/A
	Non-wastewaters, at least 260 ppm total Hg; RMERC or incinerator residues	high merc. RMERC or INCIN	N/A
	Non-wastewaters w/less than 260 ppm total Hg which are incinerator residues	low merc. incinerator	N/A
	Non-wastewaters w/any levels of Hg which are not RMERC or incinerator residues	not RMERC or INCIN	N/A
<b>U151</b>	Non-wastewaters w/less than 260 ppm total Hg which are RMERC residues	low merc. RMERC	N/A
	Non-wastewaters w/less than 260 ppm total Hg which are not RMERC residues	low merc. not RMERC	N/A
	Non-wastewaters w/greater than or equal to 260 total ppm Hg	high merc.	N/A
<b>U240</b>	2,4-D	2,4-D	N/A
	2,4-D salts and esters	salts & esters	N/A

# City Environmental Services, Inc. of Florida (CESF)

## Underlying Hazardous Constituents and Universal Treatment Standards

Constituents by Chemical Name	WW Conc.	NWW Conc.	Constituents by Chemical Name	WW Conc.	NWW Conc.	Constituents by Chemical Name	WW Conc.	NWW Conc.
1 A2213	0.042	1.4	87 1,2-Dichloroethane	0.21	6.0	173 5-Nitro-O-Toluidine	0.32	28
2 Acenaphthylene	0.059	3.4	88 1,1-Dichloroethylene	0.025	6.0	174 O-Nitrophenol**	0.028	13
3 Acenaphthene	0.059	3.4	89 Trans-1,2-Dichloroethylene	0.054	30	175 P-Nitrophenol	0.12	28
4 Acetone*	0.280	160	90 2,4-Dichlorophenol	0.044	14	176 N-Nitrosodimethylamine	0.40	28
5 Acetonitrile	5.600	3.8	91 2,6-Dichlorophenol	0.044	14	177 N-Nitrosodimethylamine	0.40	2.3
6 Acetophenone	0.010	9.7	92 1,2-Dichloropropane	0.85	18	178 N-Nitrosod-n-butylamine	0.40	17
7 2-Acetylaminofluorene	0.059	140	93 Cis-1,3-Dichloropropylene	0.036	18	179 N-Nitrosomethylthylamine	0.40	2.3
8 Acrolein	0.290	NA	94 Trans-1,3-Dichloropropylene	0.036	18	180 N-Nitrosomorpholine	0.40	2.3
9 Acrylamide**	19	23	95 Dieldrin	0.017	0.13	181 N-Nitrosopiperidine	0.013	35
10 Acrylonitrile	0.24	84	96 Diethyl Phthalate	0.20	28	182 N-Nitrosopyrrolidine	0.013	35
11 Aldicarb sulfone	0.056	0.28	97 Diethylene glycol, dicarbamate	0.056	1.4	183 Oxamyl	0.056	0.28
12 Aldrin	0.021	0.066	98 2,4-Dimethylphenol	0.036	14	184 Parathion	0.014	4.6
13 4-Aminobiphenyl	0.13	NA	99 Dimethyl Phthalate	0.047	28	185 Total PCBs	0.10	10
14 Aniline	0.81	14	100 Dibutyltin	0.056	1.4	186 Pebulate	0.042	1.4
15 Anthracene	0.059	3.4	101 Di-N-Butyl Phthalate	0.057	28	187 Pentachlorobenzene	0.055	10
16 Aramite	0.36	NA	102 1,4-Dioxinobenzene	0.32	2.3	188 Pentachlorodibenzo-P-Dioxins	0.000063	0.001
17 alpha-BHC	0.00014	0.066	103 4,6-Dinitro-O-Cresol	0.28	160	189 Pentachlorodibenzofurans	0.000035	0.001
18 beta-BHC	0.00014	0.066	104 2,4-Dinitrophenol	0.12	160	190 Pentachloroethane**	0.055	6.0
19 delta-BHC	0.023	0.066	105 2,4-Dinitrotoluene	0.32	140	191 Pentachloronitrobenzene	0.055	4.8
20 gamma-BHC	0.0017	0.066	106 2,6-Dinitrotoluene	0.55	28	192 Pentachlorophenol	0.089	7.4
21 Barban	0.056	1.4	107 Di-N-Octyl Phthalate	0.037	28	193 Phenacetin	0.081	16
22 Bendocarb	0.056	1.4	108 P-Dimethylphosphato-benzene**	0.13	NA	194 Phenanthrene	0.059	5.6
23 Bendocarb phenol	0.056	1.4	109 Di-N-Propylnitrosamine	0.40	14	195 Phenol	0.039	6.2
24 Benomyl	0.056	1.4	110 1,4-Dioxane	12	170	196 Phorate	0.021	4.6
25 Benzene*	0.14	10	111 Diphenylamine	0.92	13	197 o-Phenylenediamine	0.056	5.6
26 Benz(a)anthracene	0.059	3.4	112 Diphenylhydrazine	0.92	13	198 Phthalic Acid**	0.055	28
27 Benzyl Chloride**	0.055	6.0	113 1,2-Diphenylhydrazine	0.087	NA	199 Phthalic Anhydride	0.055	28
28 Benz(b)fluoranthene	0.11	6.8	114 Dieldrin	0.017	6.2	200 Physostigmine	0.056	1.4
29 Benz(k)fluoranthene	0.11	6.8	115 Dithiocarbamates (total)	0.028	28	201 Physostigmine salicylate	0.056	1.4
30 Benz(g,h,i)Perylene	0.0055	1.8	116 Endosulfen I	0.023	0.066	202 Promecarb	0.056	1.4
31 Benz(a)Pyrene	0.061	3.4	117 Endosulfen II	0.029	0.13	203 Pronamide	0.093	1.5
32 Bromodichloromethane	0.35	15	118 Endosulfen Sulfate	0.029	0.13	204 Prophan	0.056	1.4
33 Methyl Bromide (Bromomethane)	0.11	15	119 Endrin	0.0028	0.13	205 Propoxur	0.056	1.4
34 4-Bromophenyl Phenyl Ether	0.055	15	120 Endrin Aldehyde	0.025	0.13	206 Prosulfocarb	0.042	1.4
35 n-Butyl Alcohol*	5.6	2.6	121 EPTC	0.042	1.4	207 Pyrene	0.067	8.2
36 Butyl Benzyl Phthalate	0.017	28	122 Ethyl Acetate*	0.24	30	208 Pyridine*	0.014	16
37 Butylate	0.042	1.4	123 Ethyl Cyanide (Propionitrile)	0.24	30	209 Sairole	0.081	22
38 2-Sec-Butyl-4,6-Dinitrophenol (Dinoseb)	0.066	2.5	124 Ethyl Benzene*	0.057	10	210 Silvex (2,4,5-TP)	0.72	7.9
39 Carbaryl	0.006	0.14	125 Ethyl Ether*	0.12	160	211 2,4,5-T (2,4,5-Trichlorophenoxy acetic Acid)	0.72	7.9
40 Carbazim	0.056	1.4	126 Bis(2-Ethylhexyl) Phthalate	0.28	28	212 1,2,4,5-Tetrachlorobenzene	0.055	14
41 Carbofuran	0.006	0.14	127 Ethyl Methacrylate	0.14	160	213 Tetrachlorodibenzo-P-Dioxins	0.000063	0.001
42 Carbofuran phenol	0.056	1.4	128 Ethylene Oxide	0.12	NA	214 Tetrachlorodibenzofurans	0.000063	0.001
43 Carbon Disulfide*	3.8	4.8 mg/L	129 Fenphur	0.017	15	215 1,1,1,2-Tetrachloroethane	0.057	6.0
44 Carbon Tetrachloride*	0.057	6.0	130 Fluoranthene	0.068	3.4	216 1,1,2,2-Tetrachloroethane	0.057	6.0
45 Carbosulfan	0.028	1.4	131 Fluorene	0.059	3.4	217 Tetrachloroethylene*	0.056	6.0
46 Chlordane (Alpha And Gamma Isomers)	0.0033	0.26	132 Formetanate Hydrochloride	0.056	1.4	218 2,3,4,6-Tetrachlorophenol	0.030	7.4
47 P-Chloroaniline	0.46	16	133 Forparanate	0.056	1.4	219 Thiodcarb	0.019	1.4
48 Chlorobenzene*	0.057	6.0	134 Heptachlor	0.0012	0.066	220 Thiophanate-methyl	0.056	1.4
49 Chlorobenzilate	0.10	NA	135 Heptachlor Epoxide	0.015	0.066	221 Tirpate	0.056	0.28
50 2-Chloro-1,3-Butadiene	0.057	0.28	136 Hexachlorobenzene	0.055	10	222 Toluene*	0.080	10
51 Chlorodibromomethane	0.057	15	137 Hexachlorocyclopentadiene	0.055	6.6	223 Toxaphene	0.0095	2.6
52 Chloroethane	0.27	6.0	138 Hexachlorocyclopentadiene	0.057	2.4	224 Triallate	0.042	1.4
53 Bis(2-Chloroethoxy)Methane	0.036	7.2	139 Hexachlorodibenz-P-Dioxins	0.000063	0.001	225 Bromoform (Tribromomethane)	0.63	15
54 Bis(2-Chloroethyl)Ether	0.033	6.0	140 Hexachlorodibenzofurans	0.000063	0.001	226 1,2,4-Trichlorobenzene	0.055	19
55 Chloroform	0.046	6.0	141 Hexachloroethane	0.055	30	227 1,1,1-Trichloroethane*	0.054	6.0
56 Bis(2-Chloroisopropyl)Ether	0.055	7.2	142 Hexachloropropylene	0.055	30	228 1,1,2-Trichloroethane*	0.054	6.0
57 P-Chloro-M-Cresol	0.018	14	143 Indeno (1,2,3-c,d) Pyrene	0.0055	3.4	229 Trichloroethylene*	0.054	6.0
58 2-Chloroethyl Vinyl Ether**	0.062	NA	144 Isodimethane	0.19	65	230 Trichloromono fluoromethane*	0.020	30
59 Chloromethane (Methyl Chloride)	0.19	30	145 3-Odo-2-propynyl n-butylcarbamate	0.056	1.4	231 2,4,5-Trichlorophenol	0.18	7.4
60 2-Chloronaphthalene	0.055	5.6	146 Isobutyl Alcohol*	5.6	179	232 2,4,6-Trichlorophenol	0.035	7.4
61 2-Chlorophenol	0.044	5.7	147 Isodrin	0.021	0.066	233 1,2,3-Trichloropropane	0.85	30
62 3-Chloropropylene	0.038	30	148 Isolan	0.056	1.4	234 1,1,2-Trichloro-1,2,2-Trifluoroethane*	0.057	30
63 Chrysene	0.059	3.4	149 Heptachlor	0.081	2.9	235 Triethylamine	0.081	1.5
64 O-Cresol*	0.11	5.6	150 Kepone	0.0011	0.13	236 Tris-(2,3-Dibromopropyl) Phosphate	0.11	0.10
65 M-Cresol*	0.77	5.6	151 Methacrylonitrile	0.24	84	237 Vermolate	0.042	1.4
66 P-Cresol*	0.77	5.6	152 Methanol*	5.6	0.75 mg/L	238 Vinyl Chloride	0.27	6.0
67 m-Cumenyl methyl-carbamate	0.056	1.4	153 Methacrylonitrile	0.081	1.5	239 Xylene(s) sum of all isomers*	0.32	30
68 Cycloate	0.042	1.4	154 Methiocarb	0.056	1.4	240 Antimony	1.9	2.1 mg/L
69 Cyclohexanone*	0.36	0.75 mg/L	155 Methylol	0.028	0.14	241 Arsenic	1.4	5.0 mg/L
70 1,2-Dibromo-3-Chloropropane	0.11	15	156 Methylchlor	0.25	0.13	242 Barium	1.2	7.6 mg/L
71 Ethylene Dibromide (1,2-Dibromoethane)	0.028	15	157 3,4-Methylenedichlorobenzene	0.0055	15	243 Beryllium	0.82	0.014 mg/L
72 Dibromomethane	0.11	15	158 4,4-Methylenedichlorobenzene	0.60	30	244 Cadmium	0.69	0.19 mg/L
73 2,4-D (2,4-Dichlorophenoxyacetic Acid)	0.72	10	159 Methylene Chloride*	0.089	30	245 Chromium (Total)	2.77	0.85 mg/L
74 O,P'-DDD	0.023	0.087	160 Methyl Ethyl Ketone*	0.28	36	246 Cyanide (Total)	1.2	590 mg/kg
75 P,P'-DDD	0.023	0.087	161 Methyl isobutyl Ketone*	0.14	33	247 Cyanide (Amenable)	0.86	30 mg/kg
76 O,P'-DDE	0.031	0.087	162 Methyl Methacrylate	0.14	160	248 Fluoride	35	NA
77 P,P'-DDE	0.031	0.087	163 Methyl Methanesulfonate	0.018	NA	249 Lead	0.69	0.37 mg/L
78 O,P'-DDT	0.0039	0.087	164 Methyl Parathion	0.014	4.6	250 Mercury-WWW From Retort**	NA	0.20 mg/L
79 P,P'-DDT	0.0039	0.087	165 Melolcarb	0.056	1.4	251 Mercury-All Others	0.15	0.025 mg/L
80 Dibenz(A,H)Anthracene	0.055	8.2	166 Mexcarbation	0.056	1.4	252 Nickel	3.98	5.0 mg/L
81 Dibenz(a,e)Pyrene	0.061	NA	167 Molinate	0.042	1.4	253 Selenium	0.82	0.16 mg/L
82 M-Dichlorobenzene	0.036	6.0	168 Naphthalene	0.059	5.6	254 Silver	0.43	0.30 mg/L
83 O-Dichlorobenzene*	0.088	6.0	169 2-Naphthylamine	0.52	NA	255 Sulfide	14	NA
84 P-Dichlorobenzene	0.090	6.0	170 O-Nitroaniline**	0.27	14	256 Thallium	1.4	0.078 mg/L
85 Dichlorodifluoromethane	0.23	7.2	171 P-Nitroaniline	0.028	28	257 Vanadium	4.3	0.23 mg/L
86 1,1-Dichloroethane	0.059	6.0	172 Nitrobenzene*	0.068	14	258 Zinc**	2.61	5.3 mg/L

F001-F005 regulated hazardous constituents are boldface and marked with (\*). Constituents not regulated in F039 wastes are marked with (\*\*).  
 WWW - mg/L unless noted. NWWW - mg/kg unless noted.

## Land Disposal Restriction (LDR) Notification Form

Manifest Doc. # \_\_\_\_\_

[illegible]

This list of waste codes continues Yes \_\_\_\_\_ No \_\_\_\_\_

Waste on following line item(s) is subject to "California List" restrictions of 40 CFR 268.32 for the following characteristic(s):	
California List Characteristics	Manifest Line Item(s)
Liquid hazardous wastes >= 50 ppm PCBs	
Hazardous wastes with HOCs >= 1000 ppm (40 CFR 268, appendix III)	
Liquid hazardous wastes with nickel concentrations > 134 mg/L	
Liquid hazardous wastes with thallium concentrations > 130 mg/L	

LDR Certifications (Please list only one for each of the above line entries)	
1.	This waste complies with the treatment standards specified in 40 CFR 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).
2.	This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D, or exceeds the applicable treatment standards set forth in CFR 268.32 or RCRA section 3004(d). Waste must be treated to the appropriate standards.
3.	This waste has been treated in accordance with 40 CFR 268.40 to remove the hazardous characteristic. The above listed underlying hazardous constituents are likely present in the waste, and must be treated to the applicable standards set forth in 40 CFR 268.40 prior to land disposal.
4.	This waste is lab pack waste for incineration, and qualifies for alternative treatment as described in 40 CFR 268.42(c). Codes not eligible for alternate treatment are as follows: D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P078, P078, U134, and U141
5.	This waste qualifies for exemption from land disposal restriction (please attach explanation which includes the date exemption was granted.)
6.	This waste is not restricted under 40 CFR 268

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Date \_\_\_\_\_

Title

Generator: \_\_\_\_\_ US EPA ID # \_\_\_\_\_ Manifest Doc. # \_\_\_\_\_

[illegible]

This list of waste codes continues Yes No

Waste on following line item(s) is subject to "California List" restrictions of 40 CFR 268.32 for the following characteristic(s):	
California List Characteristics	Manifest Line Item(s)
Liquid hazardous wastes >= 50 ppm PCBs	
Hazardous wastes with HOCs >= 1000 ppm (40 CFR 268, appendix III)	
Liquid hazardous wastes with nickel concentrations > 134 mg/L	
Liquid hazardous wastes with thallium concentrations > 130 mg/L	

**LDR Certifications (Please list only one for each of the above line entries)**

1. This waste complies with the treatment standards specified in 40 CFR 268.1, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).
2. This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D, or exceeds the applicable treatment standards set forth in CFR 268.32 or RCRA section 3004(d).  
Waste must be treated to the appropriate standards.
3. This waste has been treated in accordance with 40 CFR 268.40 to remove the hazardous characteristic. The above listed underlying hazardous constituents are likely present in the waste, and must be treated to the applicable standards set forth in 40 CFR 268.40 prior to land disposal.
4. This waste is lab pack waste for incineration, and qualifies for alternative treatment as described in 40 CFR 268.42(c). Codes not eligible for alternate treatment are as follows:  
D009, F019, K003, K004, K005, K006, K071, K100, K106, P010, P011, P012, P078, P079, U134, and U151
5. This waste qualifies for exemption from land disposal restriction (please attach explanation which includes the date exemption was granted.)
6. This waste is not restricted under 40 CFR 268

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed name \_\_\_\_\_

Title

**City Environmental Services, Inc. of Florida (CESF)**  
**Land Disposal Restriction (LDR) Notification Form**

**Generator:**\_\_\_\_\_

US EPA ID # \_\_\_\_\_

Manifest Doc. # \_\_\_\_\_

[illegible]

**City Environmental Services, Inc. of Florida (CESF)**

## Land Disposal Restriction (LDR) Notification Form

**Generator:** \_\_\_\_\_

US EPA ID # \_\_\_\_\_

Manifest Doc. # \_\_\_\_\_

[illegible]



## FOLEY &amp; LARDNER

ATTORNEYS AT LAW

CHICAGO  
JACKSONVILLE  
LOS ANGELES  
MADISON  
MILWAUKEE  
SACRAMENTO

POST OFFICE BOX 2193  
ORLANDO, FLORIDA 32802-2193  
111 NORTH ORANGE AVENUE, SUITE 1800  
ORLANDO, FLORIDA 32801-2386  
TELEPHONE (407) 423-7656  
FACSIMILE (407) 648-1743

WRITER'S DIRECT LINE

SAN DIEGO  
SAN FRANCISCO  
TALLAHASSEE  
TAMPA  
WASHINGTON D.C.  
WEST PALM BEACH

August 14, 1997

Via Facsimile  
and Certified Mail/Return Receipt Requested

Douglas Beason  
Office of General Counsel  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: *City Environmental Services, Inc. of Florida proposed  
Solid Waste Permit No. SO29-293321  
OGC No. 97-1275*

Dear Doug:

In our telephone conversation today, I believe we agreed that a meeting between the Department and City Environmental Services, Inc. of Florida (City) to discuss the Department's intent to issue a solid waste permit may be productive and should go forward. As we discussed, the relationship between the Department and City regarding the solid waste permit is not good and both sides are dissatisfied with the way this permitting process has progressed. On our side we strongly believe that our frustrations and problems with how the Department has handled this case are well justified. However, these problems should not prevent either the Department or City from moving forward to try to resolve this matter without litigation.

As we have repeatedly stated in the past, City does not oppose the Department's efforts to implement its rules through proper permitting of this facility. The facility has been in operation for many years and has been thoroughly permitted and inspected on a regular basis by the waste management division. We are willing to listen to the Department's concerns and attempt to compromise where the Department has a reasonable basis to seek the protection of public health and the environment and has the appropriate legal authority to do so. However, the proposed specific permit conditions go far beyond such reasonable concerns.

Our problems with the draft permit include, but are not limited to, the following:

ESTABLISHED 1842

A MEMBER OF GLOBALLX WITH MEMBER OFFICES IN BERLIN, BRUSSELS, DUBLIN, FRANKFURT, LONDON, PARIS, SINGAPORE, STUTTGART AND TAIPEI

file: 3-4  
8/97

Douglas Beason  
August 14, 1997  
Page 2

- The permit proposes to limit the types of wastes accepted by the facility and would eliminate waste streams which are an important part of the economic viability of the facility.
- The permit includes definitions which are inaccurate and contrary to existing rule definitions. Examples include the definitions of "impervious surface" and "processing".
- The permit requires specific prior Department approvals before certain waste management activities can be undertaken. We do not believe that specific approvals of waste management activities are necessary, appropriate or practical.
- The permit would not allow management of household hazardous waste as solid waste even though this practice is in full compliance with the applicable regulations.
- The mixing system proposed by City is specifically denied without any explanation as to the basis for this action.
- The draft permit essentially eliminates solid waste processing at the facility.
- The draft permit fails to recognize the waste analysis plan included in the permit application or standard waste analysis procedures used in the industry. Specifically, the specific conditions place unreasonable limitations on out of state waste, the use of generator knowledge, and testing of waste prior to receipt at the facility. These limitations are more stringent than waste analysis requirements for hazardous waste.
- As written, no solid waste streams with any hazardous characteristics or hazardous substances would be allowed. This is a practical impossibility and is unworkable.
- The permit would not allow any liquids to leave the site nor would any standing liquids be allowed. These conditions could not be met since there is no practicable way to achieve compliance with a complete limitation on all liquids. Unimpacted rain water is a liquid.
- There are numerous other problems with language and specificity in the permit conditions. Further, many of the permit conditions are redundant in that they merely repeat their rule provisions or statements contained in the permit application which is made a part of the permit by reference.

Douglas Beason  
August 14, 1997  
Page 3

Please let me know what dates would be acceptable for a meeting. It is my understanding that due to vacation schedules it is unlikely that we will meet before September 1st. We would like to meet as early as possible and are available September 4, 5, 8, 9, 11 or 12.

Sincerely,



Thomas K. Maurer

TKM/jh

cc: Susan Johnson  
Terry Muse

1633

EB

August 8, 1997

RECEIVED  
AUG 26 1997  
D E P

Ms. Elizabeth Knauss  
Florida Dept. of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218

Dear Ms. Knauss:

This is a follow-up to the incident report submitted on May 9, 1997.

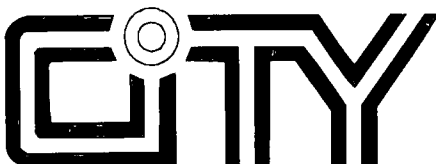
A thorough review of the recent incident indicates four probable causes:

1. Incompatible organic contamination.
2. Incompatible reducing agent (such as sodium metabisulfite) contamination.
3. Incompatible hypochlorite oxidizer contamination.
4. Incompatible contamination from a combination of moisture (humidity) in the air and floor sweeping residues.

None of the above items have been conclusively identified as the specific cause of the incident. Incompatible constituents, if any, would have been consumed by the incident. Trace levels of sodium and calcium in samples could not be ruled out as impurities in the lime, soda ash, city water, or background levels. The presence of potentially incompatible hypochlorites or meta bisulfites, therefore, could not be determined. We believe potential organic incompatible contamination would have been recognized by the four-person CESF team which packaged the material. Included in this team were two senior personnel including our emergency response supervisor.

Our internal Standard Operating Procedure (SOP) for oxidizer handling safety has been updated to include the following tests to identify the presence of incompatible materials:

1. Organics and Reducing Agents - Oxidizer test strip negative. This is not necessarily an organic or reducing agent but is not an oxidizer and must be packed separately.
2. Hypochlorite Oxidizers - Oxidizer test strip positive and pH > 8.



Ms. Elizabeth Knauss

August 8, 1997

Page 2

3. Isocyanuric Oxidizers - Oxidizer test strip positive and pH < 6.
4. Excess moisture or humidity - Use desiccant in each package.
5. Floor Sweepings - Pack separately in a container  $\leq$  five gallons.

Please note that CESF has always utilized oxidizer test strips to screen for and QC oxidizer and potentially incompatible wastes. Note also that oxidizer safety training was completed on May 14, 1997 (Item No. 4 of Incident Review Summary).

We have done a thorough review of the incident to ensure optimum safety and compliance and to minimize the potential for similar incidents to occur. Enclosed is a summary of this review and follow up. We believe this incident is closed with no need for a warning letter or penalties for the reasons noted in this letter and enclosed summary review.

Sincerely,



John A. Taylor  
Technical Services Manager

JAT:kcp

cc: Kim Clifton, US EPA Region IV



INCIDENT REVIEW SUMMARY  
For Incident Which Occurred April 26, 1997

1. April 27, 1997 Facility cleaned and operational.
2. April 28, 1997 Incident Review Meeting with CESF management and personnel.
3. CESF Waste Analysis Plan reviewed. No deficiencies or revisions necessary. Oxidizer handling SOP revised.
4. May 14, 1997 Oxidizer Safety Training of CESF personnel (including incompatibility demonstration, handout which includes a list of all DOT oxidizers and hands-on use of pH and oxidizer test strips to identify and differentiate hypochlorite oxidizers from isocyanuric oxidizers).
5. Waste and residuals disposal to:  
  
Environmental Enterprise, Inc.  
OHD 083 377 010  
Manifest 90097     Date: 6/5/97  
  
Documentation copies enclosed.
6. CESF Contingency Plan reviewed and found to be acceptable. Minor revisions, improvements, and updates are being written up. We expect to submit a revision to the Department with minor changes within 90 days.

JAT:kcp



AUG 08 '97 10:33AM

Form Approved: OMB No. 1-53-10-2 P. 2/2

igned for use on elite (12-pitch) typewriter.)

<b>HAZARDOUS MANIFEST</b>		1. Generator's US EPA ID No. FLD98193249490097		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
Name and Mailing Address ENVIRONMENTAL SERVICES, INC. OF FLORIDA 102 N. ORIENT ROAD TAMPA, FL 33619 Generator's Phone ( 813 ) 623-5302						A. State Manifest Document Number			
Transporter 1 Company Name FREEHOLD CARTAGE, INC.						6. US EPA ID Number NJ D 0 5 4 1 2 6 1 6 4		C. State Transporter's ID	
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 941-533-4599	
9. Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES, INC. 4650 SPRING GROVE ROAD CINCINNATI, OH 45232						10. US EPA ID Number OH D 0 8 3 3 7 7 0 1 0		E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone 513-541-1823	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
						No. Type		14. Unit Wt/Vol	
a. X RO WASTE OXIDIZING LIQUID, N.O.S. (D001) 5.1, UN3139, PGII (D001)						0.1.2 D.M.		0.0.6.6.0 G D001	
b. X RO WASTE OXIDIZING SOLID, N.O.S. (D001) 5.1, UN1479, PGII (D001)						0.1.8 D.M.		0.0.9.9.0 G D001	
c.									
d.									
J. Additional Descriptions for Materials Listed Above 11a. B2714 97-29466-67 11b. B2715 97-29468-85						K. Handling Codes for Wastes Listed Above 11a. ERG#140/M129 11b. ERG#140/M129			
15. Special Handling Instructions and Additional Information 24 HOUR EMERGENCY #800-624-5302									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name MELISSA DURRANCE						Signature ON BEHALF OF CITY ENVIRONMENTAL MONTH DAY YEAR Melissa E Durrance 10/6/97			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature George Green 10/6/97			
Printed/Typed Name George Green						Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature [Signature] 10/6/97			
Printed/Typed Name						Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name BULLARD, COLIN R.						Signature Colin R. Bullard 10/6/1997			

Please print or type. (Form designed for use on elite

tch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA 2002 N. ORIENT ROAD TAMPA, FL 33619		6. US EPA ID Number 1111111111111111		A. State Manifest Document Number	
4. Generator's Phone (813) 433-5303		8. US EPA ID Number		B. State Generator's ID	
5. Transporter 1 Company Name WHEELWRIGHT SERVICE, INC.		10. US EPA ID Number		C. State Transporter's ID	
7. Transporter 2 Company Name				D. Transporter's Phone 941-533-4500	
9. Designated Facility Name and Site Address ENVIRONMENTAL ENTERPRISES, INC. 4650 SPRING GROVE ROAD TAMPA, FL 33611				E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 813-541-1223	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. X NO WASTE OXIDIZING LIQUID, N.O.S. (D001) 5.1, UN3139, PGII (D001)		No. Type			
b. X NO WASTE OXIDIZING SOLID, N.O.S. (D001) 5.1, UN1479, PGII (D001)					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
11A. H2744		11A. H2744			
11B. H2715		11B. H2715			
15. Special Handling Instructions and Additional Information					
24 HOUR EMERGENCY 800-624-5302					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name MELISSA ORRANCE		Signature [Signature]		Month Day Year 6/5/97	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Month Day Year 6/6/97	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature [Signature]		Month Day Year 6/6/97	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

PRINTED ON RECYCLED PAPER  
USING SOYBEAN INK

GENERATOR COPY



## City Environmental Services, Inc. of Florida (CESF)

# Land Disposal Restriction (LDR) Notification Form

US EPA ID # FLD981932494

Manifest Doc. # 90097

[illegible]

This list of words refers to:		Yes	No	X
1	the person who is the subject of the story			
2	the person who is the object of the story			
3	the person who is the cause of the story			
4	the person who is the result of the story			
5	the person who is the witness of the story			
6	the person who is the participant in the story			
7	the person who is the observer of the story			
8	the person who is the actor in the story			
9	the person who is the victim in the story			
10	the person who is the hero in the story			
11	the person who is the villain in the story			
12	the person who is the antagonist in the story			
13	the person who is the protagonist in the story			
14	the person who is the narrator in the story			
15	the person who is the audience in the story			
16	the person who is the character in the story			
17	the person who is the setting in the story			
18	the person who is the plot in the story			
19	the person who is the theme in the story			
20	the person who is the style in the story			
21	the person who is the tone in the story			
22	the person who is the mood in the story			
23	the person who is the point of view in the story			
24	the person who is the language in the story			
25	the person who is the structure in the story			
26	the person who is the content in the story			
27	the person who is the form in the story			
28	the person who is the style in the story			
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47	the person who is the point of view in the story			
48	the person who is the language in the story			
49	the person who is the structure in the story			
50	the person who is the content in the story			
51	the person who is the form in the story			
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88	the person who is the language in the story			
89	the person who is the structure in the story			
90	the person who is the content in the story			

Waste on following line item(s) is subject to "California List" restrictions of 40 CFR 268.32 for the following characteristic(s)

California List Characteristics	Manifest Line Item(s)
Liquid hazardous wastes $\geq$ 50 ppm PCBs	
Hazardous wastes with HOCs $\geq$ 1000 ppm (40 CFR 268, appendix II)	
Liquid hazardous wastes with nickel concentrations $>$ 134 mg/L	
Liquid hazardous wastes with malium concentrations $>$ 130 mg/L	

DR Certifications (Please list only one for each of the above line entries)

1. This waste complies with the treatment standards specified in 40 CFR 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).
2. This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D, or exceeds the applicable treatment standards set forth in CFR 268.32 or RCRA section 3004(d). Waste must be treated to the appropriate standards.
3. This waste has been treated in accordance with 40 CFR 268.40 to remove the hazardous characteristic. The above listed underlying hazardous constituents are likely present in the waste, and must be treated to the applicable standards set forth in 40 CFR 268.40 prior to land disposal.
4. This waste is lab pack waste for incineration, and qualifies for alternate treatment as described in 40 CFR 268.42(c). Codes not eligible for alternate treatment are as follows: D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P019, P011, P012, P079, P078, U134, and U401.
5. This waste qualifies for exemption from land disposal restriction (please attach explanation which includes the date exemption was granted.)
6. This waste is not restricted under 40 CFR 268

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

**Signature**

MELISSA DURRANCE

**Dat**

OPERATING LOG COORD

13/42/59  
6:05:97

OUTBOUND PROFILE-UWTEEIB2715

OUTBOUND MAINIFEST DRUM DETAIL REPORT

SOTO  
OUTBOUND MAINIFEST#-90097

LIQM691

PAGE 1

PAGE/LINE	WASTE PROFILE	DRUM NUMBER	RATE	EPA CODES
1/A	UWT14385H	24836	.000	D001
1/A	UWT14385H	24838	.000	D001
1/A	UWT14385H	24839	.000	D001
1/A	UWT14385H	24840	.000	D001
1/A	UWT14385H	24841	.000	D001
1/A	UWT14385H	24842	.000	D001
1/A	UWT14385H	24843	.000	D001
1/A	UWT14385H	24844	.000	D001
1/A	UWT14385H	24845	.000	D001
1/A	UWT14385H	24847	.000	D001
1/A	UWT14385H	24848	.000	D001
1/A	UWT14385H	24849	.000	D001
1/A	UWT14385H	24850	.000	D001
1/A	UWT14385H	24851	.000	D001
1/A	UWT14385H	24852	.000	D001
1/A	UWT14385H	24853	.000	D001
A	UWT14385H	24854	.000	D001
A	UWT14385H	24855	.000	D001

13/42/59  
6:05:97

OUTBOUND PROFILE-UWTEEIB2714

OUTBOUND MAINIFEST DRUM DETAIL REPORT

SOTO  
OUTBOUND MAINIFEST#-90097

LIQM691  
PAGE 2

PAGE/LINE	WASTE PROFILE	DRUM NUMBER	RATE	EPA CODES
1/B	UWT13468H	24856	65.000	D001
1/B	UWT13468H	24857	65.000	D001
1/B	UWT13468H	24858	65.000	D001
1/B	UWT13468H	24859	65.000	D001
1/B	UWT13468H	24860	65.000	D001
1/B	UWT13468H	24861	65.000	D001
1/B	UWT13468H	24862	65.000	D001
1/B	UWT13468H	24863	65.000	D001
1/B	UWT13468H	24864	65.000	D001
1/B	UWT13468H	24865	65.000	D001
1/B	UWT13468H	24866	65.000	D001
1/B	UWT13468H	24867	65.000	D001

CITY ENVIRONMENTAL SERVICES, INC. OF FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FLORIDA 336

(813) 623-53

(800) 624-53

FAX: (813) 628-08

## Facsimile Transmission

Date:

5/9/97

To:

Beth KnaussFax # 744-6125

From:

John Taylor

No. of Pages:

3

## Message:

Enclosed are the lab results of the fire water from inside the facility warehouse. Please call me Mon. to confirm if listing is or is not required.

Thanks, John

Called 5-12-97  
C.E.S. can treat this as  
an industrial waste water on  
hazardous waste Bill Gurfach  
file 3-h  
6-97



MAY-05-1997 12:48 FROM PROGRESS ENVIR - LAB

TO

6228765

P.05



# Progress Environmental Laboratories

4450 Panama Park Road  
Tampa, Florida 33619  
(813) 247-8800  
FAX (813) 247-1807

## CERTIFICATE OF ANALYSIS - (MRS #E84207 and FDER CompCap #9003060)

To: City Environmental Services,  
Inc. of Florida  
2009 W. Orlando Road  
Tampa, FL 33619

Report Date: 5/05/97  
Page: 1 of 2

Attn: Mike Shan

PEL Lab # : 9704-80401-1  
Client ID : CENV- Vac Truck  
Project ID : Emerg. Resp.  
Location : MR VAC TRUCK  
Matrix : Liquid

Collection Information:  
Sample Date: 4/30/97  
Sample Time: 9:30  
Sampled By: Client  
Sample Quantity:

Parameter	Method	Results	MD - Less than MDL Units	MDL
<b>KCRA Metals</b>				
Silver	EPA 8010/EPA 7470			
Arsenic	EPA 8010	18.1 Y	ug/l	3.42
Barium	EPA 8010	17.3 Y	ug/l	5.62
Cadmium	EPA 8010	1150 Y	ug/l	1.00
Chromium	EPA 8010	80.7 Y	ug/l	1.00
Lead	EPA 8010	720 Y	ug/l	1.73
Selenium	EPA 8010	2360 Y	ug/l	2.92
Mercury	EPA 8010	ND	ug/l	2.63
OC Volatiles	EPA 7470	3.49 Y	ug/l	0.2
Dichlorodifluoromethane	EPA 8010	ND	ug/l	3.6
cis-1,2-Dichloroethane	EPA 8010	ND	ug/l	4.0
Chloromethane	EPA 8010	ND	ug/l	14.8
Vinyl Chloride	EPA 8010	ND	ug/l	8.0
Bromomethane	EPA 8010	ND	ug/l	10.2
Chloroethane	EPA 8010	ND	ug/l	5.8
Trichlorofluoromethane	EPA 8010	ND	ug/l	7.2
1,1-Dichloroethane	EPA 8010	12.2 J	ug/l	7.2
Methylene Chloride	EPA 8010	ND	ug/l	7.2
Trans-1,2-dichloroethane	EPA 8010	48.9 J	ug/l	20.0
1,1-Dichloroethane	EPA 8010	ND	ug/l	8.4
Chloroform	EPA 8010	ND	ug/l	7.0
1,1,1-Trichloroethane	EPA 8010	694 J	ug/l	20.0
Carbontetrachloride	EPA 8010	27.9 J	ug/l	6.0
1,2-Dichloroethane	EPA 8010	13.4 J	ug/l	6.8
Trichloroethene	EPA 8010	ND	ug/l	8.4
1,2-Dichloropropane	EPA 8010	ND	ug/l	7.2
Brom-dichloromethane	EPA 8010	ND	ug/l	7.6
		26.3 J	ug/l	8.2

- CONTINUED ON NEXT PAGE -

A Florida Progress Company

MAY-05-1997 12:48 FROM PROGRESS ENVIR - LAB TO

6228765 P.06

## Progress Environmental Laboratories

- CERTIFICATE OF ANALYSIS -  
(MRS #284207 and FDR CompRep #3003066)To: City Environmental Services,  
Inc. Of Florida  
2002 W. Orient Road  
Tampa, FL 33619Report Date: 5/05/97  
Page: 2 of 2

Attn: Mike Phan

PEL Lab # : 9704-00401-1 (Continued ...)  
Client ID : CEST- Vac Truck

Parameter	Method	Results	MD = Less than MDL Units	MDL
2-Chloroethylvinyl ether	EPA 8010	62.3 J	ug/l	26.0
Cis-1,3-Dichloropropene	EPA 8010	ND	ug/l	7.6
Trans-1,3-Dichloropropene	EPA 8010	ND	ug/l	8.4
1,1,2-Trichloroethane	EPA 8010	ND	ug/l	10.2
Tetrachloroethane	EPA 8010	82.7 J	ug/l	7.2
Dibromochloromethane	EPA 8010	ND	ug/l	9.6
Bromoform	EPA 8010	ND	ug/l	16.0
1,1,2,2-Tetrachloroethane	EPA 8010	ND	ug/l	16.4
Analysis date	EPA 8010	05-02-97	ug/l	
*1,4-Dichlorobutane (10-150t)	EPA 8010	101	NR	
*4-BFB (10-150t)	EPA 8010	79.0	NR	
GC Volatiles	EPA 8020			
MTBE	EPA 8020	ND	ug/l	12.6
Benzene	EPA 8020	ND	ug/l	5.0
Toluene	EPA 8020	254 J	ug/l	6.2
Chlorobenzene	EPA 8020	ND	ug/l	8.6
m,p-Xylene	EPA 8020	29.3 J	ug/l	8.6
o-Xylene	EPA 8020	166 J	ug/l	9.4
1,3-Dichlorobenzene	EPA 8020	79.6 J	ug/l	10.6
1,4-Dichlorobenzene	EPA 8020	ND	ug/l	11.4
1,2-Dichlorobenzene	EPA 8020	ND	ug/l	11.8
Analysis date	EPA 8020	05-02-97	ug/l	14.0
*Fluorobenzene (51-124t)	EPA 8020	104	NR	

Respectfully submitted,  
Charles E. Ingram, Quality Assurance Officer.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

February 28, 1997

Ms. Pam Scully  
U.S. EPA, Region IV  
100 Alabama Street, SW  
Atlanta, Georgia 30303

Subject: Universal Waste & Transit (now City Environmental), FLD 981 932 494  
2002 North Orient Road, Tampa, Florida  
Located between Helena Chemical and Stauffer Chemical

Dear Ms. Scully:

I am writing to provide you with some ground water data from the Universal Waste & Transit (now City Environmental) site, located between two of the Superfund sites that you manage, Helena Chemical and Stauffer Chemical, in Tampa, Florida. This site is located south of the Wheelblast property, and west of Stauffer Chemical (see attached map). Existing information shows that there is heavy pesticide, and some metals contamination at this property. Due to the location of this site downgradient of the Helena facility, and the presence of pesticides in the ground water at both the Wheelblast and City Environmental properties, we would like EPA to evaluate this data to determine if City Environmental will be included in the Helena contamination assessment/remediation efforts.

City Environmental is permitted to operate a hazardous waste container storage facility and treatment unit (filter press) facility under permit No. HO29-263213. A copy of this permit has been attached for your easy reference. The HSWA permit for this facility requires confirmatory sampling at one area of concern at the site, a storm water retention pond located on the east side of the facility.

The site has four ground water monitoring wells that City Environmental monitors annually for their own records. They have submitted the attached data to the Florida Department of Environmental Protection (FDEP). Included is a copy of:

- June 1994 ground water analytical results;
- Map of well locations, with ground water flow directions from either 1992 or 1994;
- Preliminary Site Evaluation, with soil borings and piezometers;
- Driller's log for "2 of 3 monitor wells" & map of well locations.

Ms. Pam Scully  
February 28, 1997  
Page 2

The FDEP has requested well completion information and analytical results from City Environmental, and, if received, we will forward these to your attention. We are encouraging City Environmental to work proactively with EPA and their representatives to evaluate the cause of the ground water contamination on their property. If the ground water contamination at their facility is not included with either the Helena or Stauffer cleanups, then the FDEP will look to City Environmental to remediate the property.

Thank you for your help on the telephone a few days ago, and the information on both the Helena and Stauffer sites. Please keep me informed on how City Environmental may relate to the remediation at these NPL sites. If you need any local information, please contact me at 813/744-6100, ext. 336.

Sincerely,



Allison Amram, P.G.  
Solid Waste Section

Attachments

cc: Terry Muse, General Manager, City Environmental Services, Inc. of  
Florida, 7202 East Eighth Avenue, Tampa, FL 33619  
John Taylor, Technical Services Manager, City Environmental Services, Inc. of  
Florida, 7202 East Eighth Avenue, Tampa, FL 33619  
Judie Kean, Hazardous Waste Cleanup Section, FDEP - Tallahassee, MS 4505  
George Euler, Hazardous Waste Cleanup Section, FDEP - Tallahassee, MS 4505  
Bill Crawford, RCRA Section, FDEP - Tampa  
Susan Pelz, P.E., Solid Waste Section, FDEP - Tampa  
Bob Butera, P.E., Solid Waste Administrator, FDEP - Tampa  
Bill Kutash, Waste Program Administrator, FDEP - Tampa





# Department of Environmental Protection

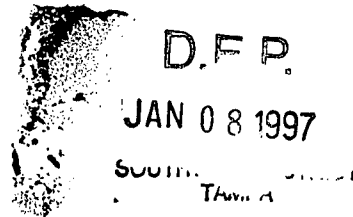
Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road MS #4560  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

January 3, 1997

Mr. Michael L. Piesko  
Chief Financial Officer  
City Management Corporation  
3400 East Lafayette  
Detroit, Michigan 48207



Re: FLD 981 932 494 - City Environmental Services, Inc. of Florida  
Tampa, Florida  
Permit H029-263213

Dear Mr. Piesko:

I reviewed the financial test dated September 12, 1996, and supporting audits used to demonstrate financial assurance for closure and find them in order. The financial test demonstrating \$207,409 adequately covers the Department approved closure estimate. I also reviewed the October 28, 1996, Hazardous Waste Facility Corporate Guarantee for closure and find it acceptable. The Certificate of Liability Insurance, policy #PLS8185749, effective September 1, 1996, appears to meet sudden liability requirements. Therefore, City Environmental Services is in compliance with the financial requirements of 40 CFR Part 264 Subpart H, as adopted by reference in Rule 62-730.180, Florida Administrative Code.

Enclosed please find updated form 62-730.900(4)(a) for submittal with your next demonstration that is due by September 30, 1997. If you have any questions, please contact me at (904) 488-0300.

Sincerely,

*Ainè Marie Ryan*

Ainè Marie Ryan  
Hazardous Waste Regulation

AMR

Enclosure

cc: Jeff Pallas, EPA  
Roger Evans  
Kathleen McCann

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

File 3-h  
4 / 97



# Department of Environmental Protection

Bille

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Terry Muse, P.E., General Manager  
City Environmental Services, Inc. of Florida  
7202 E. 8th Avenue  
Tampa, Fl. 33619

November 7, 1996

RE: Solid Waste Processing Facility  
Pending Permit No.: S029-293321, Hillsborough County

Dear Mr. Muse:

This is to acknowledge receipt of the additional information dated October 10, 1996, submitted in support of your permit application, received August 12, 1996, to construct site improvements and operate a solid waste processing facility located at 2002 North Orient Road, Tampa, Fl. 33619.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)]:

## Engineering Report.

1. "Temporary Staging Area" (Page 4) The information submitted states, "Processed or unprocessed materials may be stored in this area." (Response #1) Please clarify if the materials stored in this area will be in covered containers or loose.
2. Solid Waste Description (Page 5) Please clarify the type of "household wastes", "other discarded materials", "recyclable materials", "asbestos", "ashes", "sludges", "universal wastes", and "industrial solid wastes" which will be accepted, processed and/or stored at the facility. The information submitted states, "The facility may accept, process and/or store all types of non-RCRA regulated wastes. This includes all types of household wastes such as latex paints and soaps, all types of industrial solid wastes and sludges... all types of discarded materials such as petroleum impacted pads... and all types of recyclable materials such as oil and fluorescent lamps. [emphasis added]" (Response #2) It does not appear that the facility design or Operation Plan adequately demonstrates that "all types" of these wastes will be appropriately managed.

(Comment #2 cont'd)

a. Please explain what kind of "household soaps" are expected to be received. Will non-latex paints be accepted? Will pesticides and household solvents, pool chemicals and other chemicals be managed? Will household recyclables (i.e. glass, plastic, steel containers, newspaper, etc.) be managed at the facility? Will other household wastes (e.g. Class I wastes) be managed at the facility?

b. What types of asbestos will be managed at the facility?

c. What type of industrial wastes will be managed? Will putrescible industrial wastes be managed at the facility?

d. Please explain if the facility will manage "non-regulated" explosive, biohazardous and/or radioactive wastes.

e. Please clarify if wastes which are exempt from RCRA regulation, pursuant to 40 CFR 261.4(b) and (c), will be managed at the site.

3. Equipment. (Page 7) See also comment #22, below.

a. Please provide additional details on all processing equipment. Please show the location and installation details (i.e. piping, conveyors, etc.) of all processing equipment on a Plan Sheets.

b. The information submitted indicates that the filter press is "mobile". (Response #23) However, the manufacturer's "cut sheets" appear to indicate that the unit is stationary and "mount[ed] level to floor, [and] platform...." Page 14 indicates that the filtered solids will be emptied into "drums, cubic yard boxes, roll-offs or other suitable containers." However, the manufacturer's cut-sheets appear to indicate that there is not enough clearance under the filter press unit (in the discharge area) to accommodate a roll-off. Please clarify this discrepancy.

4. Waste Flow.

a. (Page 9) Please provide the "CESF non-RCRA regulated waste Quality Control (QC) Standard Operating Procedure (SOP)." The information submitted indicates that the Waste Analysis Plan (WAP) includes procedures for quality control and waste analysis. (Item #5) However, the WAP does not appear to specifically apply to non-RCRA regulated waste. Please clarify if the WAP is the "Standard Operating Procedure" for non-RCRA regulated waste. See also comment #13 below.

(Comment #4 cont'd)

b. (Page 10) Since the "similar materials" are stored "until sufficient quantities... are available for re-containerization," and a wide variety of materials are expected to be managed at the facility, please specify the maximum storage time and quantity for each type of material. See also Page 12, "Waste Storage". The information submitted states, "Dissimilar wastes may be processed (mixed) together,... provided they are not incompatible and there is no regulatory prohibition." (Response #7) Since dissimilar materials may be mixed together, please clarify if these waste mixtures will be sampled/analyzed prior to removal for offsite disposal. Please provide the testing requirements for mixtures of dissimilar materials.

c. (Page 10) The information submitted states, "All bulk processed waste is screened or analyzed prior to shipping offsite." (Response #9) Please clarify the type of "screening" which will be conducted. Is this screening the "Mandatory Waste Fingerprint Analyses" in the WAP? Since each disposal facility may require different testing for acceptance (e.g. soil burners' testing requirements are different than Class I landfills), please explain how the disposal facility's requirements are incorporated into the WAP.

5. Operations - Disposal. (Page 13)

a. The information submitted states, "CESF does not wish to submit a list of proposed disposal facilities since there is no regulatory requirement. It is competition-sensitive information and the facilities utilized may change in the future." (Response #12) The Department recognizes that the disposal facilities which are used may change based on economic considerations. However, since the facility proposes to manage a wide variety of materials, the Department is concerned that the materials may not be disposed of properly. The information submitted does not specifically state what types of landfills (Class I, Class III, C&D, Subtitle C), wastewater (industrial or domestic) treatment facilities or other facilities that will be used for disposal. It has been the Department's experience that permittees are often unclear on which type of disposal facility is permitted to receive the waste they manage. The Department does not agree that this information is "competitive-sensitive" since the Department has not requested information which is specific to the applicant's operation (such as costs) but has only requested the name, address, type of disposal facility and permit number. The information submitted has not provided reasonable assurance that the variety of wastes which will be managed at the facility will be disposed at appropriately permitted disposal facilities.

b. Please provide a list of proposed disposal facilities. Please include the name of the facility, address, type of facility (e.g. Class I landfill, industrial wastewater treatment facility, hazardous waste landfill, etc.) and appropriate permit number.

(Comment #5 cont'd)

c. The list on Page 36 does not appear to be complete. However, this list may be amended to include the names, addresses, permit numbers, and a more specific description of the type of facility for each waste type.

d. The Operations Plan does not appear to address the management of white goods, asbestos, construction and demolition debris, clean debris, lead-acid batteries, ashes, recyclable materials, "non-regulated" biohazardous, radioactive or explosive materials. Please include specific operational procedures for managing these wastes.

6. Storage Capacity and Containment.

a. (Page 32) The information submitted indicates that runoff from the loading, unloading and processing area is discharged to a sump and then through sand and carbon filters to the stormwater management system. Sheet 2 of 8 of the Drawings prepared by Halstead & Bellhorn, Inc., dated December 1987, received by the Department January 3, 1995, as Attachment 9 of the RCRA permit application, states, "Sump, pump, control valve & pre-treatment system... not to be connected to the storm sewer system." Please explain why the system has subsequently been connected to the stormwater management system. Please provide as-built details of the stormwater filter system, including pump, piping, filters, etc. Sheet 1 of 2 does not appear to show the pump or the discharge piping. The information also indicates that the pump "can be shut off for holding and inspection of the stormwater or for pumping the stormwater to a tank...." Please clarify where the contaminated water is held for "inspection". Since the piping and pump are not shown, please explain how contaminated water is pumped to a tank or tanker from the "holding" area. Where is the tank located?

b. (Page 33) The information submitted states, "A cross-section view of the processing area stormwater trench drains is included as Figure 19." (Response #17) However, Figure 19 is does not include a scale, is not referenced to an appropriate plan view, does not include sufficient dimensioning, and is not signed and sealed by a professional engineer. Please provide as-built details on a Plan Sheet of the trench drains system, including the "elevated" trench, the connection between the "elevated" trench and the northern trench, invert elevations, etc. Please include a scale or sufficient dimensioning.

(Comment #6 cont'd)

c. (Figure 22) According to the East/West cross-section, the asphalt west of the trench extends below the elevation of the trench. However, other information indicates that the asphalt adjacent to the trench drain is only 1-inch thick. (See "Trench Drain Detail", Sheet 3 of 8, Halstead & Bellhorn, Dec. 1987) It also appears that slopes shown on Sheet 2 of 8 do not correlate with Figure 22 (i.e. the asphalt area does not appear to slope toward the trench drain). Sheet 2 of 8 also shows another trench drain at the south (9th Avenue) entrance. Please verify the accuracy of Figure 22 with the Halstead & Bellhorn drawings, or as-built site conditions.

7. Pages 40-44, Closure Plan.

a. Please review the closure plan with respect to the quantity of solids which will be stored at the site. The Department does not object to calculations based on volume or mass, but for solids (and solidified sludges) the calculations should consider the actual bulk density of the materials which are expected to be processed at the facility (e.g. soil, construction and demolition debris, etc.). If the bulk density is unknown, then a conservative value should be used.

b. The information submitted states, "A review of weight tickets for solids shipped to landfills shows most 20 cubic yard loads are 10 tons or less. This indicates a density of... 4.95 lb/gal which is significantly less dense than water (8.34 lb/gal). The use of 8.34 lb/gal as a conversion factor for solids is, therefore, very conservative." (Response #18) Please provide a summary of the quantity (weight and volume) of solid materials sent to landfills, soil burners and other facilities. The Department does not disagree that booms, pads, and pillows will most likely have a bulk density less than water. However, the applicant has not provided information which demonstrates that booms, pads, and pillows are the majority of the solids removed from the facility. Please provide an estimate of the percentage of soil, booms/pads/pillows (light materials), solidified sludges, etc. that have historically been removed from the facility for disposal. If actual data is used to support the bulk density assumption, a weighted average which accounts for all solid materials (not just the lightweight materials) should be used.

c. Financial Assurance. The information submitted states, "There is no regulatory requirement for copies of third-party estimates for closure cost calculations." (Response #19) However, pursuant to FAC 62-701.630(3)(a), the costs shall be estimated by a professional engineer for a third-party performing the work, on a per unit basis, with the source of the estimates indicated. Pursuant to FAC 62-4.110, the Department may require an applicant to submit proof of financial responsibility and may require the applicant to post an appropriate bond to guarantee compliance with the law and Department rules. The closing cost estimates provided are not approved. (Figure 24) Please provide copies of the third-party quotes supporting all unit costs. Please verify the quantities based on Comments #7.a. and b., above.

8. Stormwater.

a. (Page 47) The information indicates that the stormwater system is "covered by the RCRA portion of the hazardous waste permit...." The information submitted states, "Copies of all CESF permits for stormwater management are included." (Response #20) However, the information submitted does not appear to include an MSSW or ERP permit or exemption issued by SWFWMD or DEP (a copy of a SWFWMD Exemption Notice application and a City of Tampa Building Plan Review application were submitted). Please provide a copy of the SWFWMD or DEP permit or exemption for the stormwater management system.

9. Attachment 4, Sheet 1 of 2.

a. Please note the following information on this Plan Sheet:

- 1) the height of the "8-inch Block Wall"; and
- 2) the dimensions of the "Retaining Wall".

b. Since the invert elevation of the trench drain at the retaining wall (el. 25.61) appears to be higher than the invert elevation at the north end of the site (el. 24.89), please explain how the trench drain drains from north to south. Please show details of the connection between the northern trench and the "elevated" trench on this Sheet. See also Comment #6.b.

10. Attachment 4, Sheet 2 of 2.

a. Please note the height of the "8-inch Block Wall" on this Plan Sheet.

b. The information submitted states, "The northernmost bay is enclosed with floor-to-ceiling walls." (Response #22.b.) However, the plan sheets provided do not indicate the extent of the walls or the material (concrete, steel). Please provide the dimensions of the "concrete containment curb" in the northernmost bay.

11. Figure 14. Please include the process steps required if a load is rejected or does not correlate with the waste profile on this diagram. The information submitted states, "Scales are available for weighing incoming and outgoing non-bulk shipments. No scales are available onsite for... bulk shipments." (Response #24) Please clarify where the scales are "available", and what type of scale is used for non-bulk shipments. Since scales are not available on-site for bulk shipments, but other information indicates that weight tickets for outgoing bulk shipments are available (see Response #18, and Comment #7.b., above), please explain how the weight of the incoming and outgoing bulk shipments are determined.

12. Figure 20. The information submitted states, "Only one of each type of processing equipment is expected to be utilized at the facility." (Response #26) Please clarify how many of each type of equipment listed in this Figure, including tanks, tankers, trucks, sludge boxes, roll-offs, etc., is available for use at the facility. Please provide typical manufacturer's cut-sheets for the sludge boxes, frac tanks, skid mounted tanks, drum pumps, and paint can crusher.

13. Waste Analysis Plan.

a. The information submitted states, "The procedures set forth in this plan ensure that this facility will be in compliance with all requirements of 40 CFR 264.13 and 268.7." (page 3) However, since 40 CFR 268.7 addresses listed and characteristic hazardous wastes and hazardous wastes which are restricted from land disposal, please clarify how this section applies to non-hazardous wastes.

b. The information submitted states, "The purpose of this Waste Analysis Plan (WAP) is to identify and document the necessary sampling methods, analytical techniques and overall procedures that are undertaken for all hazardous wastes that enter this facility for treatment or storage." [emphasis added] (page 3) Please clarify if all sections of the WAP are intended to also be used for all non-hazardous wastes which are managed at the facility.

c. The information submitted states, "It is CESF's current policy to screen non-RCRA regulated waste for hazardous characteristics utilizing the CESF WAP." (page 4) Please clarify if this "screening" is the "Mandatory Waste Fingerprint Analyses" described later (page 13). It does not appear that the "Mandatory Waste Fingerprint Analyses" includes screening for the Toxicity Characteristic.

d. Please provide a sample copy of the CESF Waste Profile, referenced as Attachment 17.1, and the Chain of Custody Form referenced as Attachment 17.3. (page 5)

e. The information submitted states, "The pre-acceptance evaluation will be re-certified at minimum annually. Re-certification or pre-acceptance evaluations will be done when any of the following occur...." (page 6) Please clarify if this means that a "pre-acceptance evaluation" (steps 1 through 5, pages 5-6) will not be conducted on each load of waste prior to acceptance at the facility. See also comment #13.g., below.

f. Please explain how "deactivation", "neutralization", and "stabilization" are disposal methods. (page 9) It seems that these are treatment methods, and the treated material must then be disposed in some other manner.



- g. The information submitted states, "As a minimum, all incoming waste shipments are subjected to the "Mandatory Waste Fingerprint Analyses".... The use of a spot check system is intended to verify that the waste received is the same as the waste characterized and identified on the pre-acceptance evaluation (waste profile)." [emphasis added](page 12) Please explain how "Mandatory Waste Fingerprint Analyses" are conducted on "all" shipments if a "spot check system" is used. Page 16 states, "...[the mandatory waste fingerprint analyses] occurs every time a shipment is received."
- h. The information submitted states, "All RCRA-regulated waste shipments will be sampled and analyzed according to the CESF Waste Analysis Plan (WAP)." (page 16) Please clarify if all non-RCRA regulated waste will also be sampled and analyzed in accordance with the CESF WAP. See also Comment #13.b., above.
- i. Please provide a copy of the "diagram for CESF Waste Screening", Attachment 17.4. (page 16)
- j. The information submitted states, "Two types of wastes are exempted from sampling and analyses. These are lab packs from households, laboratories and schools and "empty" containers." (page 17) Please explain why "households" would have lab packs. Please explain why household, laboratories and schools are exempt from sampling and analyses.
- k. The information submitted states, "[Many of the analyses] are not repeated unless it is known or believed that the waste identity may have changed during storage or processing." (page 19) Please explain how the waste identity does not change if dissimilar materials are mixed together, or if the waste is not generated by a known industrial process.
- l. Please provide a sample copy of the "CESF lab pack container contents sheet", Attachment 17.5. (page 24)
- m. The information submitted states, "Lab packs may be CESF packed or be "customer" packed.... (page 24) Before containers are shipped to CESF, a waste profile form must be submitted to CESF, including a complete set of container contents sheets describing the contents of each drum in terms of explicit chemical identification, quantities, concentrations.... (page 26)" Please explain how "household" generators are expected to provide adequate chemical identification on container contents sheets and follow appropriate lab pack procedures.

**General:**

14. The information submitted states, "Loading, unloading and processing operations may occur during inclement weather." (Response #27) Since processing activities may occur during inclement weather, please provide procedures for cleaning the trench drains, including frequency and disposition of solids which are removed.

15. The information submitted states, "Friable asbestos will have been wetted and double bagged prior to receipt at the facility. Asbestos waste is not processed at the facility." (Response #28) Since the waste types which will be accepted at the facility, listed on Page 5, specifically include asbestos, please clarify what is meant by "asbestos is not processed at the facility". Please clarify the types of asbestos which are expected to be managed at the facility. Will the facility only accept friable asbestos? It does not appear that the operational procedures provided are appropriate for managing asbestos materials. Please provide detailed procedures for managing asbestos materials.

16. The information submitted states, "Household hazardous wastes (HHW) and CESQG wastes are currently (and always have been) managed as hazardous wastes at the facility." (Response #29) However, the hazardous waste permit (#HO29-263213) indicates that only HHW which has been designated as "hazardous" by the generator will be managed as hazardous waste. Likewise, the WAP (page 17) indicates that "household" waste is exempt from sampling and analyses. Please clarify if all household hazardous wastes and CESQG wastes will be managed as hazardous waste, including sampling and analyses, at the facility.

17. Please clarify if the processing equipment used for the non-RCRA regulated materials will also be used to process RCRA-regulated materials. Please provide procedures (or reference the specific section in the RCRA permit application) for decontaminating the equipment after RCRA regulated materials are processed.

18. The information submitted states, "A storage summary table is not applicable since market conditions vary." (Response #32) However, the Department does not consider "market conditions" for materials which are being disposed. This information is necessary for the Department to evaluate the maximum capacity of the facility, the financial assurance cost estimates, and the facility design for storage. Please provide a storage summary Table which includes the following information (using consistent units-volume or mass):

- a. Type of material-e.g. (processed or unprocessed) petroleum contaminated material, paint, construction & demolition debris, asbestos, industrial waste sludges, etc.;
- b. Type and size of storage container-e.g. 55-gallon drum, 20 c.y. roll-off, 500-gallon tote tank, etc.;
- c. Storage location-e.g. inside building-Bay 1, loading/unloading/processing area, staging area, etc.; and
- d. Maximum storage quantity or time.

19. Please provide sample copies of manifests and other recordkeeping documents, and explain how each is used for management of non-RCRA regulated wastes.

20. Please provide a list of all potable wells within 1000 feet of the site. Please field verify the locations of any wells within this area, and show the locations on a vicinity (or similar) map. If this information has been submitted as part of the RCRA permit application, please reference the specific section, page, revision date, for this information.

**General:**

21. Please be advised that the cover letter submitted was not signed. Please provide information which bears the original signature of the writer or signature and seal of the professional (engineer, geologist, etc.) who prepared the information. Please include the original signature and seal of the professional engineer on all Plan Sheets, Drawings, calculations, etc.

22. Please be advised that the pending permit application is considered a construction/operation permit, and the Department requires construction drawings for review. Since the construction/installation of the mixing equipment and related conveyors, materials handling equipment, storage silo, etc. does not appear to have been previously permitted, the Department requires construction drawings for these systems. The construction drawings must include piping, slopes, drainage, structural, and other installation details. Upon completion of construction of the processing systems, the permit may be modified to authorize the operation of those systems.

23. Since the response to the Department's September 9, 1996 letter was not received by Hillsborough County EPC until November 1, 1996, please be advised that the Department will require that the applicant fully address EPC's concerns as part of the permitting process. Please provide **four** copies of all responses to the Department, and an additional **two** copies to Hillsborough County EPC for concurrent review.

24. Please be advised that this is the Department's second request for additional information. Due to the magnitude of the comments above, the Department suggests that a meeting be scheduled with the applicant, engineer, Hillsborough County EPC and the Department to discuss the remaining items.

**The following comments are for information only, at this time, and do not require an immediate response:**

1. Please be advised that although the materials proposed to be managed at the facility may not be regulated under RCRA, all solid waste is regulated by FAC 62-701, except as noted in FAC 62-701.220(2). FAC 62-701.300(1)(b) requires that no person shall store or dispose of solid waste in a manner that causes air quality standards to be violated or water quality standards or criteria of receiving waters to be violated. FAC 62-4.070(1) requires that the applicant shall provide reasonable assurance that the proposed project will not discharge, emit, or cause pollution in contravention of Department standards or rules.

2. Please be advised that the Department's Air Section, Environmental Resources Program, and Industrial Waste Sections have been contacted regarding the applicability of any additional permits for the proposed operation. The Department may request additional information based on comments, if any, from these sections.

3. Please be aware that storage or processing of solid waste materials or other activities at the adjacent site (8th Avenue) are not authorized at this time.

"NOTICE! Pursuant to the provisions of Section 120.60, F.S., if the Department does not receive a complete response to this request for information within 30 days of the date of this letter, the Department may issue a final order denying your application. You need to respond within 30 days after the date of this letter, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than 30 days to develop, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of a timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

You are requested to submit **four copies** of all information, as one complete package. Please submit an additional two copies to Hillsborough County EPC for their review. If there are points which must be discussed and resolved, please contact me at (813) 744-6100 ext. 386.

Sincerely,



Susan J. Pelz, P.E.  
Solid Waste Section  
Division of Waste Management

sjp

cc: John Taylor, City Environmental, 7202 E. 8th Ave., Tampa, Fl. 33619  
Srinivas G. Rao, P.E., Engineering & Applied Science, Inc.,  
18545 Otterwood Ave., Tampa, Fl. 33647  
Paul Schipfer, HCEPC  
Robert Butera, P.E., FDEP Tampa-Solid Waste *for RB*  
William Crawford, P.E., FDEP Tampa-RCRA  
Randy Cooper, P.E., FDEP Tampa-ERP  
Gerald Kissel, P.E., FDEP-Air Section



*Bill Crawford*

# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

Mr. Terry Muse, General Manager  
City Environmental Services, Inc. of Florida  
7202 E. 8th Avenue  
Tampa, Fl. 33619

September 9, 1996

RE: Solid Waste Processing Facility  
Pending Permit No.: S029-293321, Hillsborough County

Dear Mr. Muse:

This is to acknowledge receipt of your permit application to operate a solid waste processing facility located at 2002 North Orient Road, Tampa, Fl. 33619. The Department received your application on August 12, 1996.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)]:

## Engineering Report.

1. Page 4. Please clarify the activities which are included in "temporary staging". Will trucks, roll-offs or other containers be loaded or unloaded in this area? Will processed or unprocessed materials be stored in this area?
2. Page 5. Please clarify the type of "household wastes," "other discarded materials," "recyclable materials," "sludges," and "industrial solid wastes" which will be accepted, processed and/or stored at the facility.
3. Page 7. Please provide additional details on all processing equipment. A manufacturer's specification sheet (cut-sheet) for manufactured equipment such as the filter press, sand filters, reagent silo, solidification unit, etc. may be acceptable for this item. Please show the location and installation details (i.e. piping, conveyors, etc.) of all processing equipment on a Plan Sheet.
4. Page 9. Please specify the inspection criteria for the containers (item #8). Are the containers inspected for size, quantity, type of waste, or other criteria?

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

5. Page 9. Please provide the "CESF non-RCRA regulated waste Quality Control (QC) Standard Operating Procedure (SOP)." Please provide the "CESF Waste Analysis Plan" referenced in the Contingency Plan, page 21.
6. Page 9. Please explain how "non-conforming" waste which is managed as hazardous waste is tracked separately from "conforming" waste. Please specify the criteria which is used to make the determination of "conforming" or "non-conforming".
7. Page 10. Please clarify the reference to "similar materials" in item #13. See also Page 12, "Waste Storage". At what point in the process are materials determined to be "similar"? What is the criteria for this determination? Please clarify if dissimilar materials will be processed (mixed) together.
8. Page 10. Please explain at what point in the process the determination is made to recontainerize, filter, solidify, or otherwise process the material. Please provide the criteria for this determination. (See items #14, #15)
9. Page 10. Please explain at what point in the process the determination is made to conduct "confirmatory screening or analysis of waste ready for shipment off-site... per the CESF... QC SOP." (See item #16)
10. Page 11. Please explain the reference to "shredding". It does not appear that procedures for, or equipment for, shredding are included in the information submitted. What materials are intended to be shredded?
11. Page 13. Please clarify the reference to "most" wastewaters and "most" solids. Will wastewaters and solids be removed for disposal other than off-site treatment facilities and permitted landfills? The Department understands that some materials, such as used oil, and mercury containing devices, may be removed for recycling.
12. Page 13. Please provide a list of proposed disposal facilities. Please include the name of the facility, address, type of facility (e.g. Class I landfill, wastewater treatment facility, hazardous waste landfill, etc.) and appropriate permit number. The list on Page 36 may be amended to include the names and addresses of the facilities for each type of waste.
13. Page 15. Please explain where the "paste-like" solidified/stabilized sludge waste "will cure/set to become a solid...." Is the material removed from the solidification unit and allowed to cure elsewhere? How is the "paste-like" substance removed from the solidification unit?
14. Page 15. Please explain why "other reagents... may be added to... improve compressive strength...." of the waste materials since the intended disposition is disposal only. Are some materials intended to be reused?

15. Page 24. Please provide proof of publication of the Notice of Application (attached).

16. Page 32. The information submitted indicates that runoff from the loading, unloading and processing area is discharged to a sump and then through sand and carbon filters to the stormwater management system. The information also indicates that the pump "can be shut off for holding and inspection of the stormwater or for pumping the stormwater to a tank...." Please provide operational procedures for this activity. Is the pump automatically controlled? At what point is the pump shut off? What is the criteria for re-activating the pump?

17. Page 33. Please clarify the reference to "the elevated second trench".

18. Pages 40-44, **Closure Plan**. The information indicates that 100,000 gallons of solids are expected to be stored at the facility at any time. This figure is then converted to tons using 8.34lb/gallon. However, this conversion is for water, and may not be appropriate for solids. For example, neglecting the weight of the drum, although a 55-gallon drum which is full of water may weigh 458.7 lb (55 gal x 8.34lb/gal), the same drum full of soil may weigh 735 lb (55 gal/7.48 gal/cf x 100lb/cf). Likewise, other materials such as cement kiln dust may have lower bulk densities than soil or water. Please review the closure plan with respect to the quantity of solids which will be stored at the site. The Department does not object to calculations based on volume or mass, but for solids (and solidified sludges) the calculations should consider the actual bulk density of the materials which are expected to be processed at the facility (e.g. soil, construction and demolition debris, etc.). If the bulk density is unknown, then a conservative value should be used.

19. **Financial Assurance**. The closing cost estimates provided are not approved.

- a. Page 42. Please provide a copy of the third-party estimate, or a reference, for the \$15 per hour labor cost.
- b. Figure 24. Please provide a copy of the third-party estimate supporting all unit costs.

20. Page 47. Please clarify if water which has contacted solid waste (due to spillage, leakage, etc. in the processing area) is tested to determine if the water must be managed as solid waste (leachate). Please provide a copy of the SWFWMD, DEP and/or EPA permit for the stormwater management system.

21. **Attachment 4, Sheet 1 of 2.**

- a. Please provide the height of the "8-inch Block Wall".

(Comment #21, cont'd)

b. Please provide the dimensions of the "Retaining Wall". Is the "retaining wall" permanent, or does it consist of moveable barriers?

c. Since the invert elevation of the trench drain at the retaining wall (el. 25.61) appears to be higher than the invert elevation at the north end of the site (el. 24.89), please explain how the trench drain drains from north to south.

**22. Attachment 4, Sheet 2 of 2.**

a. Please provide the height of the "8-inch Block Wall".

b. Please provide the dimensions of the "concrete containment curb" in the northernmost bay.

23. Figure 13. Please clarify if one filter press is intended to be used in each of the bays, or if multiple filter presses are used.

24. Figure 14. Please clarify if the facility has scales for weighing incoming and outgoing shipments.

25. Figure 19. Please clarify the L1 and L2 designations in the "Contributing Catchment Area".

26. Figure 20. Please clarify how many of each type of equipment is available for use at the facility.

**General:**

27. Since it appears that the majority of the loading, unloading and processing activities will not occur under roof, please provide operational procedures for inclement weather.

28. Please clarify the types of asbestos which are expected to be accepted, processed and stored at the facility. It does not appear that the operational procedures provided are appropriate for managing asbestos materials. Please provide procedures for managing asbestos materials.

29. Please clarify if household hazardous wastes and CESQG wastes are expected to be managed at the facility. If so, please specify the types of these wastes which will be managed at the facility.

30. Please clarify if the processing equipment used for the non-RCRA regulated materials will also be used to process RCRA-regulated materials. If so, please provide procedures for decontaminating the equipment after RCRA regulated materials are processed.

31. Please provide a list of personnel (position descriptions and qualifications) required to effectively operate the facility. Who is responsible for determining if a waste is acceptable/unacceptable, similar/dissimilar, and its storage location?



32. Please provide a storage summary Table which includes the following information (using consistent units-volume or mass):

- a. Type of material-e.g. (processed or unprocessed) petroleum contaminated material, paint, construction & demolition debris, asbestos, industrial waste sludges, etc.;
- b. Type and size of storage container-e.g. 55-gallon drum, 20 c.y. roll-off, 500-gallon tote tank, etc.;
- c. Storage location-e.g. inside building-Bay 1, loading/unloading/processing area, staging area, etc.; and
- d. Maximum storage quantity.

33. Please provide a description of the recordkeeping/manifest system which is used for the non-RCRA regulated wastes.

34. Please provide a list of all potable wells within 1000 feet of the site. Please field verify the locations of any wells within this area, and show the locations on a vicinity (or similar) map.

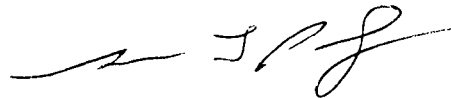
**The following comments are for information only, at this time, and do not require an immediate response:**

1. Page 3, indicates that the expected life of the facility is 30 years for closure purposes. However, please be advised that for the purposes of the financial assurance, the costs (when approved) must be fully funded and not funded over an extended period of time.
2. Page 32. "The warehouse containments" do not appear to be shown on "Attachment 22".
3. Page 3, Contingency Plan. It does not appear that a Site layout is included as Attachment 8.1.
4. Please be advised that the Department's Air Section, Environmental Resources Program, and Industrial Waste Sections have been contacted regarding the applicability of any additional permits for the proposed operation. The Department may request additional information based on comments, if any, from these sections.
5. If construction of the processing systems has not been previously authorized by a Department permit, the pending permit application will be considered a construction/operation permit. Upon completion of construction of the processing systems, the construction permit may be modified to authorize the operation of those systems.
6. It was the Department's understanding from the meeting on May 31, 1996, that City environmental would be applying for a permit for the 8th Avenue site as well as the Orient Road site. However, the information submitted seems to be only for the Orient Road site. Please be aware that storage of solid waste materials or other activities at the adjacent site are not authorized at this time.

"NOTICE! Pursuant to the provisions of Section 120.60, F.S., if the Department does not receive a complete response to this request for information within 30 days of the date of this letter, the Department may issue a final order denying your application. You need to respond within 30 days after the date of this letter, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than 30 days to develop, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of a timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

You are requested to submit **four copies** of all information, as one complete package. Please submit an additional two copies to Hillsborough County EPC for their review. If there are points which must be discussed and resolved, please contact me at (813) 744-6100 ext. 386.

Sincerely,



Susan J. Pelz, P.E.  
Solid Waste Section  
Division of Waste Management

sjp

Attachment

cc: John Taylor, City Environmental, 7202 E. 8th Ave., Tampa, Fl. 33619  
Srinivas G. Rao, P.E., Engineering & Applied Science, Inc.,  
18545 Otterwood Ave., Tampa, Fl. 33647  
Paul Schipfer, HCEPC, w/o attachment  
Robert Butera, P.E., FDEP Tampa-Solid Waste, w/o attachment  
William Crawford, P.E., FDEP Tampa-RCRA, w/o attachment  
Randy Cooper, P.E., FDEP Tampa-ERP, w/o attachment  
Gerald Kissel, P.E., FDEP-Air Section, w/o attachment  
Mohammed Kader, P.E., FDEP-Industrial Waste, w/o attachment



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 22, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**RECEIVED**  
**AUG 26 1996**

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

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

Dear Mr. Taylor:

In your submission of the 1995 Biennial Hazardous Waste Report to the Florida Department of Environmental Protection (FDEP), there were reporting inconsistencies and mistakes, including several waste streams reported as being received from sources with invalid EPA ID numbers. The State of Florida, in 62-730.180(7) of the Florida Administrative Code, has adopted the requirements in 40 CFR 264.75 (c) which states that the EPA ID number of each generator sending waste to your facility must be listed in the Biennial Report. These problems were discussed by telephone with you on 7/4/96 and 8/6/96. You re-submitted your report on 8/15/96 by diskette with the omission of those waste stream receipt reports which were in question.

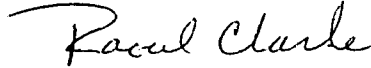
*If these wastes were not received by City Environmental Services in 1995, please send us a letter stating that the initial reporting of these waste receipts was in error. If the non-reporting of these waste streams was an inadvertent omission on your part, please send corrected reports containing the missing data in its entirety, including the correct EPA ID numbers of the generators in question.*

A listing of other report inconsistencies is included. Please send an annotated copy of this list to us with any corrections or clarifications you have made.

**Any re-submission or clarification of your report must be postmarked or hand delivered to our office by the 15th working day after your receipt of this letter.** You may seek an extension of time to submit your clarifications, but the request must be made before the end of the 15 day period. FDEP considers this report to be an important and integral part of the compliance process, and failure to submit correct data in the future may be reviewed for further action by this Department.

Should you have any questions in this matter, please contact Jack Griffith at (904)488-0300 or MS 4555 at the letterhead address.

Sincerely,

A handwritten signature in cursive script that reads "Raoul Clarke".

Raoul Clarke  
Environmental Administrator  
Hazardous Waste Management Section

RC/jg

cc: Satish Kastury  
Diana Coleman -OGC  
David Kelley  
Jack Griffith  
Bill Crawford -SW District

**RECEIVED**  
AUG 26 1996  
Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

ERROR LISTING FOR UNIVERSAL WASTE &amp; TRANSIT, INC. TAMPA 06-04-1996 RUN ON 07-15-1996

GM ERROR SET FOR H9819324.G19

page# message

00021 G109 BAD FORM CODE = B  
00057 G106 NO RPT YEAR GEN, TREAT, OR SHIP -> BAD PAGE?  
00058 G106 NO RPT YEAR GEN, TREAT, OR SHIP -> BAD PAGE?  
00044 G206 NO WASTE CODES FOUND  
00048 G206 NO WASTE CODES FOUND  
00034 CHECK: 151.342 TONS SHIPPED TO MID054683479  
00035 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00036 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00037 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00038 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00039 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00040 WARN: G507 MID054683479 DID NOT REPORT HAVING M121 TREATMENT SYS. IN 1993  
00041 WARN: G507 MID054683479 DID NOT REPORT HAVING M129 TREATMENT SYS. IN 1993  
00042 WARN: G507 MID054683479 DID NOT REPORT HAVING M121 TREATMENT SYS. IN 1993  
00043 WARN: G507 MID054683479 DID NOT REPORT HAVING M121 TREATMENT SYS. IN 1993  
00056 WARN: G500 OFFSITE TREATMENT SYS CODE WRONG FOR FORM CODE?: ORGANIC SOLIDS SENT TO M041 SYSTEM 00056

OK per g/12 phone call

WR ERROR SET FOR H9819324.R19

page# message

0020 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0057 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0083 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0084 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0124 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0178 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304418  
0196 R105 ZERO QTY RECEIVED FROM FLD980799183  
0241 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0248 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0253 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0254 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0267 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0268 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0272 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0273 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0309 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0310 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0311 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0312 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0363 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0448 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0449 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0450 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0451 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0452 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0453 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0454 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0528 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304218  
0529 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304218  
0541 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0584 R105 ZERO QTY RECEIVED FROM FLD984197855  
0602 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0603 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0604 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0605 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0606 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0653 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0654 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0655 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0656 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0670 R111 WASTE RECEIVED FROM BAD EPA ID ALTMP0001637  
0691 R111 WASTE RECEIVED FROM BAD EPA ID SS0000000000  
0843 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0844 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0845 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0846 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0847 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0848 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0849 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023  
0850 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023

TEMP ID per 93

93 TEMP ID

93 TEMP ID

0851 R111 WASTE RECEIVED FROM BAD EPA ID FLTMP9304023 ← 93 TEMP ID  
R112 WASTE RECEIVED THIS YEAR NOT SHIPPED IN GM (AS ORG = 4)-122.1058

0149 R206 NO WASTE CODES FOUND  
0726 R206 NO WASTE CODES FOUND  
0730 R206 NO WASTE CODES FOUND  
0732 R206 NO WASTE CODES FOUND  
0780 R206 NO WASTE CODES FOUND  
0806 R206 NO WASTE CODES FOUND  
0850 R206 NO WASTE CODES FOUND

IT-  
ACB-  
Nemoye  
bun  
H.W.  
report

IC ERROR SET FOR H9819324.S19

CHECK: IC SAYS PERMITTED STORAGE, DO YOU HAVE A PERMIT?

WARN: S206 IC SAYS SOURCE REDUCTION: GM REDUCTION AMOUNT IS 0

WARN: S207 IC SAYS RECYCLING: GM RECYCLING AMOUNT IS 0

IC ERROR SET FOR H9819324.S39

OI ERROR SET FOR H9819324.019

6 BAD ID FOR OI SITE = NA  
13 NO ADDRESS FOR TSDR OR GEN  
13 BAD ID FOR OI SITE = NA  
15 BAD ID FOR OI SITE = NA  
24 BAD ID FOR OI SITE = NA  
25 BAD EPA ID FLD298734303  
31 NO ADDRESS FOR TSDR OR GEN  
31 BAD ID FOR OI SITE = NA  
38 BAD EPA ID FLD484260323  
42 NO ADDRESS FOR TSDR OR GEN  
42 BAD ID FOR OI SITE = NA  
50 BAD EPA ID FLD986594544  
51 NO ADDRESS FOR TSDR OR GEN  
51 BAD ID FOR OI SITE = NA  
54 BAD ID FOR OI SITE = NA  
56 BAD ID FOR OI SITE = NA  
58 NO ADDRESS FOR TSDR OR GEN  
58 BAD ID FOR OI SITE = NA  
60 BAD ID FOR OI SITE = NA  
66 BAD ID FOR OI SITE = NA  
68 BAD ID FOR OI SITE = NA  
69 BAD ID FOR OI SITE = NA  
72 BAD EPA ID FLTMP9304418  
74 BAD ID FOR OI SITE = NA  
77 BAD ID FOR OI SITE = NA  
80 BAD ID FOR OI SITE = NA  
81 BAD ID FOR OI SITE = NA  
82 BAD ID FOR OI SITE = NA  
83 BAD ID FOR OI SITE = NA  
85 NO ADDRESS FOR TSDR OR GEN  
85 BAD ID FOR OI SITE = NA  
86 BAD ID FOR OI SITE = NA  
91 BAD ID FOR OI SITE = NA  
96 BAD ID FOR OI SITE = NA  
99 BAD ID FOR OI SITE = NA  
100 BAD ID FOR OI SITE = NA  
103 BAD ID FOR OI SITE = NA  
107 BAD ID FOR OI SITE = NA  
109 NO CITY FOR TSDR OR GEN  
109 BAD ID FOR OI SITE = NA  
111 BAD ID FOR OI SITE = NA  
112 BAD ID FOR OI SITE = NA  
119 BAD ID FOR OI SITE = NA  
120 BAD ID FOR OI SITE = NA  
122 BAD ID FOR OI SITE = NA  
124 BAD ID FOR OI SITE = NA  
125 BAD ID FOR OI SITE = NA  
126 BAD ID FOR OI SITE = NA  
132 BAD ID FOR OI SITE = NA  
133 BAD ID FOR OI SITE = NA  
134 BAD ID FOR OI SITE = NA  
136 BAD ID FOR OI SITE = NA  
137 BAD ID FOR OI SITE = NA  
138 BAD ID FOR OI SITE = NA  
140 BAD ID FOR OI SITE = NA  
141 BAD ID FOR OI SITE = NA  
145 BAD ID FOR OI SITE = NA

146 BAD ID FOR OI SITE = NA  
 148 BAD ID FOR OI SITE = NA  
 151 BAD ID FOR OI SITE = NA  
 159 BAD ID FOR OI SITE = NA  
 160 BAD ID FOR OI SITE = NA  
 173 BAD ID FOR OI SITE = NA  
 178 BAD ID FOR OI SITE = NA  
 190 BAD EPA ID FLD981744875  
 192 BAD ID FOR OI SITE = NA  
 196 BAD EPA ID FLTMP9304218  
 201 BAD EPA ID FLD984091605  
 206 BAD ID FOR OI SITE = NA  
 208 BAD ID FOR OI SITE = NA  
 209 BAD ID FOR OI SITE = NA  
 217 BAD ID FOR OI SITE = NA  
 227 BAD EPA ID FLD980083747  
 228 BAD ID FOR OI SITE = NA  
 233 BAD EPA ID FLD040218619  
 236 BAD ID FOR OI SITE = NA  
 239 BAD ID FOR OI SITE = NA  
 240 BAD ID FOR OI SITE = NA  
 241 BAD EPA ID FLD000813248  
 256 BAD EPA ID FLD821080001  
 263 BAD EPA ID ALTMP0001637  
 272 BAD ID FOR OI SITE = NA  
 273 BAD EPA ID FLD384209320  
 275 BAD ID FOR OI SITE = NA  
 276 BAD ID FOR OI SITE = NA  
 279 BAD ID FOR OI SITE = NA  
 288 BAD ID FOR OI SITE = NA  
 300 BAD ID FOR OI SITE = NA  
 307 BAD ID FOR OI SITE = NA  
 309 BAD ID FOR OI SITE = NA  
 314 BAD ID FOR OI SITE = NA  
 318 BAD ID FOR OI SITE = NA  
 319 BAD ID FOR OI SITE = NA  
 00323 BAD EPA ID FLTMP9304023

FORM(S) OI MISSING FOR THESE SITE ID'S:

FLD000004531  
 FLD0000541144  
 FLD096594544  
 FLD981474216  
 FLD981474638  
 FLD982118291  
 FLD982136913  
 FLD984179002  
 FLD984237933  
 FLD984260323  
 FLT950050831  
 FLT950051649  
 FLT950053314  
 GAD981264906

REPORT TOTALS FOR H9819324.S59UNIVERSAL WASTE & TRANSIT, INC. TAMPA 06-04-1996 IN TONS

PREV TOTAL GENERATED FOR H9819324.S59 = 1482.18  
 TOTAL GENERATED (GM) FOR H9819324.S59 = 0  
 TOTAL RECEIVED (WR) FOR H9819324.S59 = 1351.951  
 TOTAL SHIPPED (GM) FOR H9819324.S59 = 1229.844  
 TOTAL TREATED (GM) FOR H9819324.S59 = 0  
 TOTAL TREATED (PS) FOR H9819324.S59 = 0  
 TOTAL POTW OR NPDES (GM) H9819324.S59 = 0