

# Florida Department of Environmental Regulation

Southwest District

3804 Coconut Palm Dr.

Tampa, Florida 33614

Lawton Chiles, Governor

813-744-6100

Virginia Wetherell, Secretary

DATE: 2/12/98  
TIME: 1:30 p. Conf. Rm B  
SUBJECT: Fla Waste Environmental

## A T T E N D E E S

Name	Affiliation	Telephone
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<u>STEVE MORAN</u>	<u>FDEP - Southwest</u>	<u>(813) 744-6100 x385</u>
<u>Stanley Tam</u>	<u>FDEP</u>	<u>" x-390</u>
<u>Roger Evans</u>	<u>FDEP</u>	<u>" x 388</u>



FLORIDA WASTE ENVIRONMENTAL SERVICES, Inc.

Used oil Processor Application: Review Comments

A

- ✓ 1 ✓
- ✓ 2 ✓
- ✓ 3 Subpart C                      Subpart E                      Subpart H                      Subpart I
- 3 generator, - transporter - marketer - disposal

✓

- 4 Feb 8, 1986

- 5

X

- 6 FLR ppp 013 888 page 5 SPC plan seq FLD 980 839 468

- 7 5218 St Paul Street, Tampa, Florida 33619

- 8 Same

✓ 9 Frances B Paaksma address same phone 813-246-4711

✓ 10 Jim Steiner same as 7 0

✓ 11 same as (9)

✓ 12 Corporation in Florida

✓ 13 owned

X

X 14 should include corporation name or N/A

✓ B

X 15 Needs UTM

- 2

X 3 Application should direct reviewer to map(s) that satisfy this requirement.

The location of the facility could not be identified on the included topographic map

✓ a.

X

X b

✓ c

The scale drawing <sup>/photos</sup> of the facility showing the location of all past, present and future receiving, storage and processing areas could not be located.

Traffic patterns

Material movement

C-1

X 2 should indicate N/A

\* Application not bound

General Facility operation

\* Pages of application do not have header

3 Waste oil, PCW, Oil filters, etc (non PCRA - non used oil)

operated for 15 year date current application began Feb. 8, 96 (Plan A.4) SPC say 11-1-95

\* The number of employees is not given

\* The type jobs is not indicated

detailed Process flow

\* 4 the information required in this section is not provided. Some limited discussion of the industrial waste water treatment is provided.

Waste Analysis Plan

5 Item 3.1 -

Generator:

2nd line - Prior to removal 1,000

Removal from where?

How is oil removed from an account?

\* 7th line - Sampling for "non-specificity parameter" is not sufficient - TCLP and listed Solvents

\* 7th & 8th line appear to conflict.

\* Exhibit 4 not located

\* Exhibit 5 not located

\* Page 13 could not be located

\* The last paragraph before the note indicates that loads are subject to sampling and analysis. The application must describe the frequency of sampling.

\* The description of sample identification and the tracking of the samples is not discussed

\* Sampling of out going shipments is not discussed

Anti-Freeze - TLLP - since facility does not recycle -  
insure not RCRA waste - describe management  
of material

3

### Sledge Management

\* v 4.1.4 - The application items 2.1.5 and 1.3.6.1 <sup>and 4.1.4</sup> seem to indicate that some RCRA regulated material may be stored at the facility

### Tracking

✓ Item 5.1 1<sup>st</sup> Paragraph - should be in waste analysis plan

2<sup>nd</sup> Paragraph - what is the paper work?

✓ 5.2 2<sup>nd</sup> Paragraph - where is Exhib. 3

Products are logged where and how

5.3 state Anti-freeze recycling -

Attachment 1 / of Waste Analysis Plan stat. For Disposal

Tracking not described

✓ where is Exhibit 5

# Readiness and Prevention (Comments)

Page 7 not signed

Figure 1 ~~Page 11~~ no orientation, no scale, no tank identification, shows 6 tanks

Page 11 - Figure 2 could not be located

Last sentence say annual field check - Page 1

say testing every 10 years

Could not locate page 12

2.2 - what forms are used for routine inspections?

2.3 - size of secondary containment for loading/unloading area?

- procedures for loading/unloading need to be described. This description needs to demonstrate how they will minimize releases and/or incidents (~~at~~ ~~year~~ no information)

2.6 - The application must describe the recycling process

Preparedness: Protective Plan - Attachment 6. SPCC plan has not been modified to address need information.

Item #6

bullhorn speaker and intercom

- x a - mentioned page 34 item 6.2 - not described
- x b
- x c the inventory, map, could not be located
- x d not discussed
- x e
- x f
- x g
- x h
- x i
- x j

Exhibit 1 could not be found

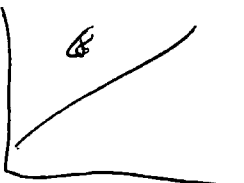
Item #7 Contingency Plan (Attachment 6)

Comments are addressed toward Addendum 1

- ✓ a spill ✓ yes 6.1 section 5 Annex 7 Attachment 6
- ✗ b fire 6.2
- ✓ c names, address, qual. locations <sup>no</sup>
- ✓ d 5.3.2

code description

- ✓ inventory Part 2 e.8 of w/ Addendum I
- ✓ x location
- ✓ x f
- ✓ x g plan, ~~signals~~, routes <sup>x</sup>
- ✓ x h plan, signals, routes <sup>x</sup>
- i
- ✓ x j maintenance and distribution of plan
- k



Item 8 Attachment #7

a containers - labeling of containers and area not discussed

- i) aisle space not described
- ii) description of secondary containment not included
- iii) inspector identified:

inspection form not included, records retention not discussed

b tanks - Table 1 could not be located

i) the application does not provide any information on the used oil processing tanks.

tank farm dimensions, with engineering drawings construction details

inspection form, records retention

ii) attachment 8.0 of application

X iii)

X iv)

Item 9: Attachment #8

a. ~~no schedule included~~ section 8.5

✓ X b. list of tanks not included

a. ✓ section 8.6

X d. acceptable in general

revisions necessary to develop ~~spec.~~ clarity

## Item 10 &amp; Attachment #9

Used oil Transport - Not applicable process - notice only

X a ✓

b ✓

c ✓

a. The intro (Attachment 9) states that specific training requirements will be met. Addendum II does not expand the statements in Attachment 9 and describe the specific training fact, timing of initial (for new employees) and frequency of renewal training.

The application does not describe the specific forms to be used to document training.



## Industrial Waste Waters

### Marine Services

Bigo Pumping

Oily Waters  
Black Water  
Grey Water

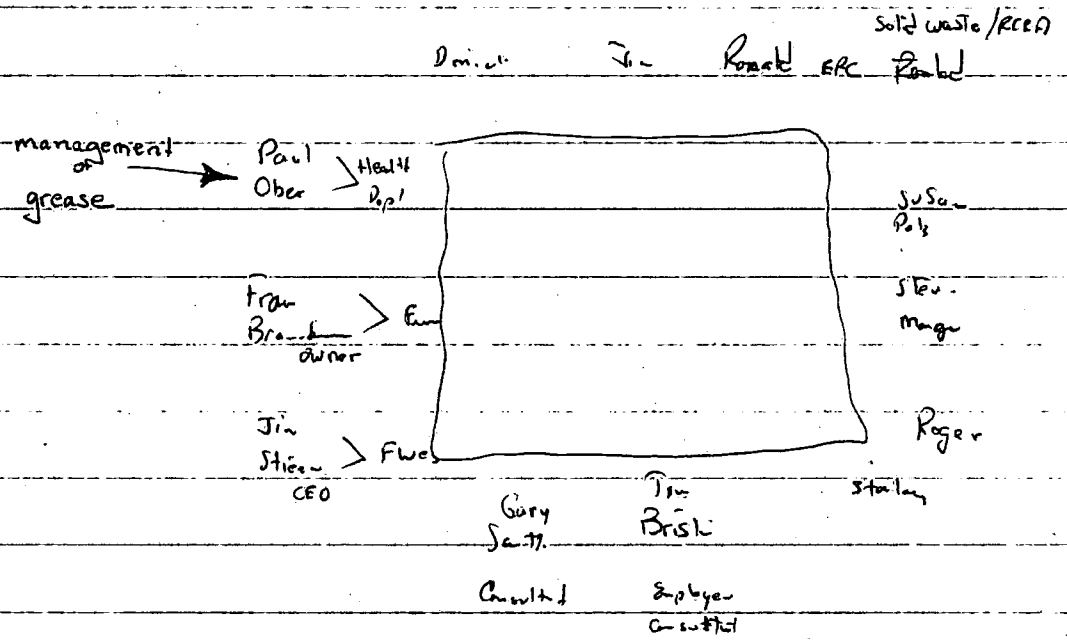
Spill Response

Oily Water Separator - Proprietary Process

- Can Remove/Separate More than oil and water

Mobile treatment Unit -

Attempting to move to more technology based treatment



Facility doesn't want to process any solid waste

Wants to be a transfer facility for all types of waste

Commercial Restaurant - Grease, Br  
Ror

Industrial Commercial - tank cleaning, tank installation / removal

Marine - bilge pumpings < bilge oil(?)

Environmental -

Recycle used oil

anti freeze

PCIW

Petroleum Contaminated Soils

Drill logging from Petroleum contaminated site