

Permit Correspondence Page 1 Vol (4-c)

[illegible]

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Stanley Tam, Program Manager, Tampa
Hazardous Waste Regulation SCT

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

Date: July 18, 2000

Subject: **USL City Environmental Services, FLD 981 932 494**
Operating Permit Application 34875-H001-002
Response to phone information request

Attached are documents dated July 10, 2000, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from City.
2. Revised pages to the application.

Please replace information in the original application.

Attachments

cc Narindar Kumar, Chief RCRA Branch, EPA Region IV

FILE: 4-C
13/00

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

July 10, 2000

Attention: Roger Evans

Re: Revisions to Operating Permit Application
I.D. No.: FLD 981 932 494
Application No.: 34875-H001-002

Dear Mr. Evans

This letter is written to provide the Department with revision to the permit application referenced above. The revisions were made following the information at the request of the Department. The attached Closure Cost Worksheets contained an administrative error that resulted in incorrect calculations. The worksheets have been corrected and are submitted to replace those previously submitted. The corrected worksheets include TD-1 and CS-2. These worksheets are submitted for the TSDF alone and for the TSDF and Transfer Operations combined.


Michael D. Knox
Technical Services Manager

RECEIVED
JUL 13 2000
Department of Environmental Protection
BY SOUTHWEST DISTRICT

MDK/mdk

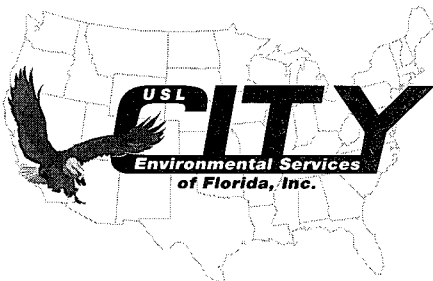
Attachments - corrected worksheets:

TD-1 (TSDF)
TD-1 (TSDF & 10 day)
CS-2 (TSDF)
CS-2 (TSDF & 10-day)

REVISED PAGES ARE IN
FACILITY'S OP. PERMIT RENEWAL
APPLICATION - Filed ON
BOOK SHELF

FILE: 4-C

12/00



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD
=====

Date: July 5, 2000 Subject: USL CITY - RENEWAL OF
OPERATING PERMIT

Time: 10⁰⁰ AM Permit No.: 34875-H001-002

County: Hillsborough

Mr. MIKE KNOX Telephone No.: (813) 623-5302

Representing: USL CITY ENVIRONMENTAL SERVICES

☒ Phoned Me ☐ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved In Conversation/Meeting: NONE

Summary of Conversation/Meeting: MR. KNOX CALLED AS REQUESTED BY ROGER
EVANS TO DISCUSS ADDITIONAL INFORMATION AND REVISIONS FDEP
IS REQUIRING TO FURTHER PROCESS CITY'S OPERATING PERMIT
RENEWAL APPLICATION. I DISCUSSED THE FOLLOWING WITH
MR. KNOX : (1) IN SECTION 2 PAGE 8 THE APPLICATION STATES
THAT, "BULK LOADS OF RECEIVED MATERIALS ARE STORED OUTSIDE IN
APPROVED AREAS." MR. KNOX EXPLAINED THAT THIS COULD BE ROLL-OFFS
AND TANKERS OF HAZARDOUS WASTE. I EXPLAINED TO MR. KNOX THAT
CITY IS NOT PERMITTED TO STORE THESE MATERIALS "OUTSIDE".

(Continue on another
sheet, if necessary)

Signature: Albert Kephart

Engineer III

Title: _____

File: 4C
11/00

MR. KNOX SUGGESTED, AND I CONCURRED, THAT HE TAKE HIS SENTENCE OUT OF THE TEXT AND ADDRESS IT IN THE FACILITY'S CONSTRUCTION PERMIT APPLICATION. (2) IN SECTION 11 PAGE 25 MR. KNOX WAS TOLD THAT THE VALUE FOR THE TOTAL COST OF CLOSURE WAS NOT CORRECT AND HE NEEDS TO RECALCULATE THE COST. HE AGREED. (3) ON FORM CS-2 (TSD ONLY), MR KNOX WAS TOLD THAT THE VALUE GIVEN IN Item #8 WAS NOT CORRECT AND THE VALUES AT THE BOTTOM OF THE PAGE WERE NOT CORRECT. MR. KNOX WAS TOLD THAT HE NEEDS TO RECALCULATE THESE VALUES. (4) ON FORM CS-2 (TSD AND 10 DAY TRANSFER), MR. KNOX WAS TOLD THAT THE VALUE GIVEN ON LINE ITEM #8 WAS NOT CORRECT AND THE VALUES AT THE BOTTOM OF THE PAGE AS WELL AS THE VALUE FOR THE TOTAL COST OF CLOSURE WERE NOT CORRECT. MR. KNOX WAS TOLD THAT HE NEEDS TO RECALCULATE THESE VALUES. MR. KNOX AGREED TO MAKING THE REVISIONS AS STATED IN (1) THRU (4) ABOVE AND WILL SUBMIT THEM UNDER A NEW REVISION DATE AND A COVER LETTER REFERENCING THIS CALL.

Initials: AK

Memorandum

Florida Department of Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Stanley Tam, Program Manager, Tampa
Hazardous Waste Regulation SCT

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

Date: June 1, 2000

Subject: **USL City Environmental Services, FLD 981 932 494
Operating Permit Application 34875-H001-002
Response to Meeting of May 12th on Application
Deficiency**

Attached are documents dated May 26, 2000, which are subject to the referenced permit application. This package contains the following information:

1. Cover letter with summary of revised corrections to the application.
2. Revised pages to the application.

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

Attachments

cc Narindar Kumar, Chief RCRA Branch, EPA Region IV

FILE: 4-C
10/00

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

May 26, 2000
RECEIVED
MAY 26 2000

Attention: Roger Evans

Department of Environmental Protection
SOUTHWEST DISTRICT

Re: May 12 Meeting - Final Revisions to Operating Permit Application
I.D. No.: FLD 981 932 494
Application No.: 34875-HO01-002

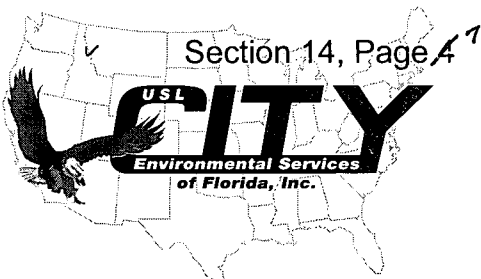
Dear Mr. Evans

This letter is written to provide the Department with revision to the permit application referenced above. The following summary describes each revision. The revisions were made following the information as discussed in our May 12 meeting.

Revision 00
Date: 5/23/00

Description of Change

- | | |
|-----------------------------------|---|
| ✓ Section 2, Page 8 | remove fluorescent bulb reference from first paragraph |
| Section 2, Page 9 | delete Fluorescent Bulb Crusher from bottom of page |
| Section 11, Page 25 | revise closure cost figures in bottom paragraph to match recalculated worksheets |
| ✓ Section 14, Page 2 | remove fluorescent bulb reference from (contents) list |
| ✓ Section 14, Page 4 | change wording in top paragraph for inbound bulk loads back to original version. Also add period after "facility" |
| ✓ Section 14, Page 4 ⁶ | change wording in Bulk Inbound Shipments paragraph for back to original version. |
| ✓ Section 14, Page 4 ⁷ | remove fluorescent bulb reference from second paragraph |



File: 4-C
09/00

CS-2 & TD-1

These worksheet pages have been corrected
and recalculated

Please contact me at (813) 623-5302 ext. 235 if you have questions or require
further information on this submittal. Thank-you for your assistance.



Michael D. Knox
Technical Services Manager



Bob Mulholland
Facility Manager

MDK/mdk
Attachments - page revisions as listed above

Memorandum

Florida Department of
Environmental Protection

To: Satish Kastury
Administrator, Tallahassee

Thru: Stanley Tam, Program Manager, Tampa
Hazardous Waste Regulation SCT

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

Date: May 11, 2000

Subject: **USL City Environmental Services, FLD 981 932 494
Operating Permit Application 34875-H001-002
Response to Meeting of April 18th on Application
Deficiency**

Attached are documents dated April 19, 2000, which are subject to the referenced permit application. This package contains the following information:

1. Single page cover letter from City.
2. Revised pages and drawings to the application.

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

Attachments

cc Narindar Kumar, Chief RCRA Branch, EPA Region IV

FILE: 4-C

08/00

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 5-4-00 Subject Operating Permit Application
Time 10:45 AM Permit No. 34875-H001-002
County Hillsborough
Mr. Mike Knox Telephone No. _____

Representing CITY ENVIRONMENTAL SERVICES (CES)

☐ Phoned Me ☒ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting Discussed City's submittal (April 19, 2000) in response to FDEP comments to 1st NOD (meeting of April 18, 2000). Some items of discussion included:-

Section 2, p.9 As previously stated by CES, they do not intend to crush fluorescent bulbs. CES should remove any text which references crushing of fluorescent bulbs.

Section 11 Provide re-calculated worksheets for TD-3, CS-2 (TSDF only), CS-2 (TSDF & 10-day transfer) and revise the 'Total Closure Cost' on page 25

Section 14, p.4 Modify first paragraph, as sentence is too long
p.6 Modify the text to discuss only the changes to the Operating Permit and not what is proposed after Construction Permit is completed

Signature Roger Evans

Note: Mike Knox met with the FDEP on 5-12-00 to further clarify any remaining issues with the O.P. application.

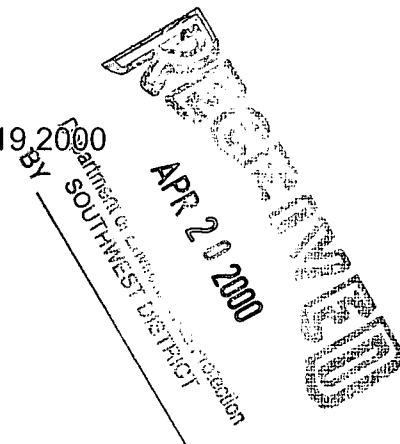
FILE: 4-C
07/00

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

Attention: Roger Evans

Re: Page Revisions from April 18, 2000 Meeting
I.D. No.: FLD 981 932 494
Application No.: 34875-HO01-002

April 19, 2000



Dear Mr. Evans,

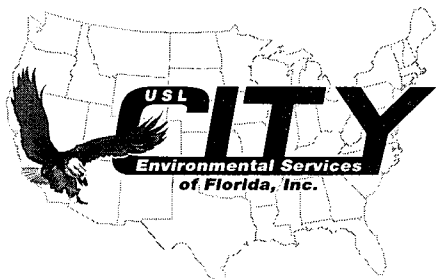
The attached page revisions are submitted to replace pages previously submitted the Department. These revisions are the result of the meeting between the Department and USL City Environmental Services of Florida, Inc. on 18 April, 2000. The pages are to be added to the permit application as required.

Sincerely,

Michael D. Knox
Technical Services Manager

Bob Mulholland
Facility Manager

MDK:mdk



File: 4-c
06/00



David B. Struhs
Secretary

SUBJECT: City Environmental Services - Discussion of response to 1st NOD

Telephone

744-6100

623-5302 x235

744-6100 ext. 372

due in 45-days.

05/00

USL City Environmental Services (CESF) FLD 981 932 494
Operating Permit Application 34875-HO01-002
April 18, 2000

Items for discussion on City's response to 1st NOD

Section 2

p.9 The revised text did not identify where paint can crushing operations will occur.

The legend on Figure 5.16 needs to be more specific to address hazardous waste.

Figure 5.16 alludes that asphalt is impervious. Discuss the rationale behind this statement.

The storage of hazardous waste is not allowed on the 'Dock' area (excluding transfer waste).

Section 3

p.7 Page 7 of the application needs to be re-formatted to flow with the modified page 6.

Section 6

p.3 Awkward sentence structure. Suggested change is "CESF personnel who do not typically visit the facility more than once per year, do not have a training record".

p.14 Correct sentence alignment.

Section 8

Please identify the location of page 22.

p.10 The DEP On-Scene Coordinator (OSC) telephone area code needs to be changed to 850.

Section 11

Final computed values for TD-1 (for TSDF and TSDF plus Transfer Operations) are incorrect, hence CS-2 are also incorrect. Please re-calculate and modify the calculations.

p.25 Please re-calculate the Total Closure Cost.

Section 14

p.4 CESF has answered the question but not addressed our concerns. CESF need to describe in the application how they intend to log the starting date of any incoming bulk shipments that may be there for a time period not to exceed one year. Discussion will include incoming bulk shipments that may be empty, partially full, being added to or completely filled.

p.17 The discussion of the backwash water from the sand and carbon filters was not clear. Please describe how the backwash waste is collected, any samples that may be taken, etc.

Section 16

p.13 The value was not changed to read 0.46m³

Section 18

p.3 The headings, 'Attachment' and 'Title' at the bottom of this page needs to be removed and inserted at the top of page 4.

R. EVANS FDEP
M. KNOX CESF
A. BERTHART FDEP

USL City Environmental Services (CESF) FLD 981 932 494
Operating Permit Application 34875-HO01-002
April 18, 2000

4-18-00
~~10:30 AM~~
10:30 AM

Items for discussion on City's response to 1st NOD

Section 2

- p.9 ✓ The revised text did not identify where paint can crushing operations will occur. *Will Add to TEXT.*
- ✓ The legend on Figure 5.16 needs to be more specific to address hazardous waste. *Add the words "non-hazardous" in legend*
- ✓ Figure 5.16 alludes that asphalt is impervious. Discuss the rationale behind this statement. *Will eliminate "impervious" if OK with solid on waste people.*
- ✓ The storage of hazardous waste is not allowed on the 'Dock' area (excluding transfer waste). *IF NOT OK WITH SUSAN THEN THEY WILL HAVE TO RE-WORD.*

Section 3

- p.7 ✓ Page 7 of the application needs to be re-formatted to flow with the modified page 6. *Put last line of old p.6 on the top of p.7*

Section 6

- p.3 ✓ Awkward sentence structure. Suggested change is "CESF personnel who do not typically visit the facility more than once per year, do not have a training record".

- p.14 ✓ Correct sentence alignment.

Section 8

- ✓ Please identify the location of page 22. *Provide page 22*
- p.10 ✓ The DEP On-Scene Coordinator (OSC) telephone area code needs to be changed to (850) from (904)

Section 11

- ✓ Final computed values for TD-1 (for TSDF and TSDF plus Transfer Operations) are incorrect, hence CS-2 are also incorrect. Please re-calculate and modify the calculations. *Will re-do calculations*
- p.25 ✓ Please re-calculate the Total Closure Cost.

Time frame of bulk shipments. Bulk shipments (partial load) when does the date start? Same as container tracking.

Anything added with a date older than the arrival tanker will change the tanker date to that of the oldest date of any container added to

Section 14

p.4

At 2 locations in application.

✓ CESF has answered the question but not addressed our concerns. CESF need to describe in the application how they intend to log the starting date of any incoming bulk shipments that may be there for a time period not to exceed one year. Discussion will include incoming bulk shipments that may be empty, partially full, being added to or completely filled.

bulk tanker. Total tracking will be available on computer. For op. permit, take out ~~constr~~ added into put back into constr permit.

p.17

✓ The discussion of the backwash water from the sand and carbon filters was not clear. Please describe how the backwash waste is collected, any samples that may be taken, etc.

BACKWASH WATER AND SOLIDS ARE CAPTURED IN ~~CONSTR~~ PARKING LOT AND THEN PUMPED BACK THRU SAND FILTER.

Section 16

p.13

✓ The value was not changed to read 0.46m³

Section 18

p.3

✓ The headings, 'Attachment' and 'Title' at the bottom of this page needs to be removed and inserted at the top of page 4.

Memorandum

Florida Department of
Environmental Protection

TO: Satish Kastury
Administrator, Tallahassee

THRU: Stanley Tam, Program Manager, Tampa
Hazardous Waste Regulation SCT

FROM: Roger Evans, Engineer, Tampa RE.
Hazardous Waste Regulation

DATE: April 11, 2000

SUBJECT: **USL City Environmental Services, FLD 981 932 494**
Operating Permit Application 34875-H001-002
Response to 1st Notice of Deficiency

Attached are documents submitted on April 6, 2000, which are subject to the referenced permit application. The package contains the following information:

1. Single cover page from City.
2. Summarized responses to each item in the NOD.
3. Summary pages of revised corrections to the application.

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

Attachments

cc: Narindar Kumar, Chief RCRA Branch, EPA Region IV

FILE: 4-C
04/00

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

March 27, 2000

Attention: Roger Evans

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Re: First Notice of Deficiency Response
I.D. No.: FLD 981 932 494
Permit No.: H029-263213

APR - 6 2000

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Evans


This information is provided in response to the February 25, 2000 FDEP letter RE: USL City Environmental Services of Florida, Inc., (CESF), Operating Permit Application 34875-HO01-002 First Notice of Deficiency.

The response is in two sections. The first section, Section 1 Comments/ Responses, identifies each Department comment followed by our response. The second section, Section 2 Page Revisions, contains the page revisions to be inserted into the application. The date in the revision block of each page revision has been changed, the revision number will remain "00".

This response is submitted within the forty-five (45) day period required. Thank-you for your assistance, please call myself or Bob Mulholland if you require further information.



Michael D. Knox
Technical Services Manager



Bob Mulholland
Facility Manager

MDK/mdk



FILE: 4-C
03/00

Section 1 Comments/ Responses

FDEP Comment:

General

Permit number HO29-263213 is identified on page 1 of each section. This should be replaced with the appropriate application number 34875-HO01-002.

✓ *OK* *CESF Response:*

The appropriate permit number "34875-HO0-002" has been placed on each section.

FDEP Comment:

Section 1

Page 3 of 5 of DEP Form 62-730.900(2)(a)

- Registrations as a Hazardous Waste Transporter and Used Oil Collection and Transporter are not permits but annual notifications of these activities to the Department. Please revise the table to identify only environmental permits that the facility has applied for or received.

✓ *OK* *CESF Response:*

The table on page 3 of 5 of DEP Form 62-730.900(2)(a) has been revised to include only permits applied for or received.

FDEP Comment:

Page 4 of 5 DEP Form 62-730.900(2)(a)

- Item B.1 What does N2752.5 – W8215/7.5 represent? From the Latitude and Longitude provided by CESF, the corresponding UTM# is **NORTHING** = 3093.760km, **EASTING**=364.90km and **ZONE**=17. This is represented as 17/ 364940/ 3093760. Please revise the application to include this UTM#.

✓ *OK* *CESF Response:*

The UTM # on page 4 of 5 of the DEP Form 62-730.900(2)(a) has been revised to represent the location as "17/ 364940/ 3093760".

FDEP Comment:

Page 1 of 3 of the DEP Form 62-730.900(2)(c)

- What and where is the surface impoundment CESF claims to have on site?

✓ *OK* *CESF Response:*

Page 1 of 3 of the DEP Form 62-730.900(2)(c) has been changed to reflect no surface impoundment on site.

FDEP Comment:

Page 1 of 4 of the DEP Form 62-730.900(2)(d)

- The owner or authorized representative must provide an original signature for the "Operator" of the facility. Please provide an original form containing the appropriate signature.

✓ OK *CESF Response:*

An original copy of Page 1 of 4 of the DEP Form 62-730.900(2)(d) has been provided with an original signature of the facility "Operator" as required.

FDEP Comment:

Section 2 General Information

p.5 The second and third paragraph make reference to Figure 5.12A which was not found in the permit application. Please provide this figure.

✓ OK *CESF Response:*

Figure 5.12A has been added as needed. Additionally, the Table of Contents for Section 5 has been updated to include Figure 5.12A.

FDEP Comment:

p.8 Please indicate in a table or otherwise describe in what text what waste categories stored in which storage bay (e.g., Flammable- Bay 2)

✓ OK *CESF Response:*

Figure 5.12A has been added and contains the waste categories for each Bay.

FDEP Comment:

p.9 Please revise the text to identify the locations within the facility where recontainerization operations and paint can crushing will be performed. This was not identified in Attachment 5.12 as indicated in the text.

CESF Response:

The text on p.9 has been revised to reference Figure 5.16 and to identify the locations where recontainerization operations and paint can crushing will be performed.

Description of areas too vague - how not allowed to be stored outside of building.

FDEP Comment:

Section 3 General Facility Standards

p.6 The Department has observed Bay 2 being used to store 'cyanide bearing' waste and flammable acid waste at the same time. Cyanides and acids are incompatible. It is acknowledged that CESF stores flammable acids in Bay 2 based on the determination that the flammability classification is generally the 'primary' waste category. However, to alleviate potential compatibility problems, the Department strongly recommend that either:

- 1) All 'cyanide bearing' wastes be provided with secondary containment (which meets 40 CFR 264 Subpart I requirements) that is independent of Bay 2; or
- 2) All 'cyanide bearing' wastes be stored in the southeastern corner of Bay 2 (the area highlighted in the attached figure).

'Cyanide bearing' waste include D003 wastes that meet the definition under 40 CFR 261.23(a)(5) and any 'listed' wastes that has any form of cyanide as a 'Basis for Listing' under 40 CFR 261 Appendix VII (e.g., F006 – F012, F019, K007, K060, etc.).

CESF Response:

All 'cyanide bearing' wastes will be stored in the southeastern corner of Bay 2 as recommended in FDEP item 2) above. This location is identified in Figure 5.12A. Additionally, p.6 of Section 3 General Facility Standards has been revised to reference this storage requirement.

FDEP Comment:

p.8 The text references Bays 1, 2 and 3. Please provide a drawing that identifies the locations of the three Bays.

CESF Response:

Figure 5.12A has been added and provides the location of each of the three Bays.

FDEP Comment:

Section 5 Inspection Plan

p.3 The second paragraph states "inspections will be approved by a senior CESF employee" Please indicate a 'sign-off' line on the inspection log to verify that a review and approval was completed.

CESF Response:

The inspection log has been revised to include a 'sign-off' line so that a review and approval of the inspection can be verified. Additionally, mercury spill kits have been added to item 8.4 of the Inspection Log.

FDEP Comment:

p.4 According to the text, a copy of CESF's Inspection Log was included in the application. Please provide a copy of the Inspection Log as this was not found in the application.

✓ OK

CESF Response:

A copy of the Inspection Log has been added to Section 5 Inspection Plan.

FDEP Comment:

Section 6 Training Program

p.3 Identify in the first paragraph where the Contingency Plan Training received by off-site CESF personnel, that may visit the site infrequently, is documented.

✓ OK

CESF Response:

p.3 The first paragraph of p.3 in Section 6 Training Program has been revised to state that "Contingency Plan Training for CESF employees is documented in the Employee Training Record. CESF personnel who do not have a training record do not typically visit the facility more than once per year. These employees will be treated as visitors. They will be given a safety briefing and be accompanied by a trained employee if they visit the facility."

FDEP Comment:

p.6 The training course outline shows the 'Contingency Plan Implementation' is completed twice. If this is the case, please identify the difference between the two.

✓ OK

CESF Response:

p.6 The training course outline has been corrected to show 'Contingency Plan Implementation' listed only once.

FDEP Comment:

p.12 The heading 'JOB DESCRIPTION' at the bottom of this page needs to be removed and inserted at the top of page 13.

✓ OK

CESF Response: The heading 'JOB DESCRIPTION' at the bottom of this page has been removed and inserted at the top of page 13.

FDEP Comment:

p.13 The heading 'JOB DESCRIPTION' at the bottom of this page needs to be removed and inserted at the top of page 14.

CESF Response: The heading 'JOB DESCRIPTION' at the bottom of this page has been removed and inserted at the top of page 14.

TYPO IS OK
STILL THERE
ON P.14

FDEP Comment:

p.21 The chart on this page is identical to the chart on page 20. Is this a duplicate copy or did CESF intend to include a different chart?

✓ OK
CESF Response:

The chart on page 21 is a duplicate to the one on page 20. Page 21 is deleted and should be removed from the permit application.

FDEP Comment:

Section 7 Preparedness and Prevention

p.6 As CESF presently manages mercury lamps, they should indicate in their spill control equipment what they will be using to clean up broken lamps (e.g. HgX) to amalgamate any mercury residue and reduce emissions.

✓ OK
CESF Response:

p.6, paragraph three of Section 7 Preparedness and Prevention has been revised to include mercury clean up materials (e.g. HgX, Mercsorb or equivalent)

FDEP Comment:

Section 8 Contingency Plan and Emergency Procedures

The Contingency Plan is to be a 'stand alone' document and hence all figures, attachments, etc. are to be included in the plan.

Could not locate page 22
CESF Response:

Copies all figures and attachments applicable to the Contingency plan have been added to the plan. (Pages 22 through 25)

FDEP Comment:

p.4 The last sentence in the second paragraph is redundant as it repeats a previous sentence. Please remove the last sentence from the text.

✓ OK
CESF Response:

p.4 The last sentence in the second paragraph is redundant as it repeats a previous sentence. It has been removed from the text.

FDEP Comment:

p.10 Please modify the FDEP-Tallahassee area codes from 904 to 850.

The DEP (OSC) area code needs to be changed to 850.
CESF Response:

p.10 The FDEP-Tallahassee area codes have been changed from 904 to 850.

FDEP Comment:

p.20 The 'Decontamination Procedures' should also address the clean up procedures for mercury spills.

✓ OK
CESF Response:

p.20 The 'Decontamination Procedures' have been revised to address the clean up procedures for mercury spills.

FDEP Comment:

Section 11 Closure Plan

p.21 Please provide an estimated time line (e.g. days) for each of the seven tasks to be performed for final closure of the facility.

✓ OK
CESF Response:

p.21 An estimated time line for each of the seven tasks to be performed for final closure of the facility has been provided.

FDEP Comment:

Worksheet TD-1, Step 1 -The calculated value for the Treatment and Disposal of Waste (TD-2) for TSDF and TSDF plus Transfer Operations appears to be incorrect. Please recalculate this value.

Note: Please recalculate any other worksheets that these calculations may have impacted.

CESF Response:

Worksheet TD-1, Step 1 -The calculated value for the Treatment and Disposal of Waste (TD-2) for TSDF and TSDF plus Transfer Operations have been recalculated. All other worksheets that use these calculations have been revised accordingly.

Final computed value for TD-1 is incorrect hence CS-2 TOTAL is incorrect

FDEP Comment:

Section 14 Processes, Procedures, Structures, and Equipment

p.4 Please expand on what is meant by "Bulk hazardous waste manifested to CESF to be shipped off-site within 24 hours of arrival at the facility (if the load is not unloaded to the warehouse or being added into)".

CESF Response:

p.4 "Bulk hazardous waste manifested to CESF to be shipped off-site within 24 hours of arrival at the facility (if the load is not unloaded to the warehouse or being added into)" means that these materials will not be required to be shipped off site within 24 hours of arrival at the facility if the load is unloaded (transferred) into other containers stored in the warehouse or if containers are loaded (transferred) into it. This will allow time for the needed transfer to occur, a maximum of five (5) days.

Has not addressed our concerns.
- Starting log dates

FDEP Comment:

p.4 The third paragraph makes reference to Figure 5.12A which was not found in the application. Please provide this figure.

✓ OK *CESF Response:*

p.4 Figure 5.12A has been added as needed. Additionally, the Table of Contents for Attachment 5 has been updated to include Figure 5.12A.

FDEP Comment:

p.9 If CESF intends to crush lamps that are fluorescent lamps that are managed as hazardous waste they must identify the lamp crusher as a treatment unit and meet all applicable requirements of 40 CFR 264 Subpart X.

✓ OK *CESF Response:*

p.9 CESF does not intend to crush lamps. Section 14 Processes, Procedures, Structures, and Equipment page 9 is revised to remove the Fluorescent Lamp Compacting information.

FDEP Comment:

p.11 Provide a description within the application that describes how and where containers which held acute hazardous waste will be triple rinsed or otherwise rendered 'empty' at the CESF facility.

✓ OK *CESF Response:*

p.11 The Acute Empty paragraph is revised to read as follows: Acute empty containers will be triple rinsed or managed as hazardous waste. Containers that are triple rinsed will be thoroughly rinsed using clean water a minimum of three (3) times. The container will be fully emptied into a container, typically a 55-gallon drum or 5-gallon bucket following each rinse. The collected rinse water will be managed as hazardous waste. The rinsing will occur within the warehouse above the impervious floor.

FDEP Comment:

p.16 The third paragraph indicates that the stormwater system is pumped through a carbon filter. To our recollection, from past compliance inspections of the facility, there were two carbon filters installed. Please revise the text to accurately describe this area.

✓ OK *CESF Response:*

p.16 The third paragraph has been revised to describe two carbon filters.

FDEP Comment:

p.17 The text identifies that the retention pond retains filtered stormwater. Does the pond also collect non-filtered stormwater from roof drains?

✓ *OK*
CESF Response:

p.17 Yes, the non-filtered stormwater from the roof drains discharge directly into the retention pond. This information is added to the text for clarification.

FDEP Comment:

p.17 Please describe how the back flushed waste from the sand filter is collected prior to making a waste determination.

Disposition of backwash water?
CESF Response:

All backflushed materials are collected within the sand and carbon filters. These materials are not removed or collected separately. The backwashing process simply reverses the flow to allow for a resettling of sediment within the filters. These filters may be sampled and analyzed for characterization, but are typically disposed of as hazardous waste.

FDEP Comment:

Section 15 Miscellaneous Unit

p.4 The title of Attachment 2 within the parenthesis is not the Hazardous Waste Process Code List. This should be corrected to be consistent.

✓ *OK*
CESF Response:

p.4 The title of Attachment 2 within the parenthesis has been changed to "Summary of Characteristic and Listed Hazardous Wastes" to be consistent with the title of Attachment 2.

FDEP Comment:

p.7 The first sentence in paragraph two needs clarification as testing alone is not sufficient to determine a 'listed' classification.

✓ *OK*
CESF Response:

p.7 The first sentence of paragraph two+ has been changed as follows for clarification. " If the sludge treated by the filter press is a hazardous waste, the solids and liquids from the filter press will be analyzed to determine their classification. Proper waste classification for these materials will be achieved based on laboratory analysis of the materials or by using the original classification of the waste."

FDEP Comment:

Section 16 Air Emissions

p.9 The emission calculations on Tables 2 through 6 were not provided.

✓ OK

CESF Response:

p.9 The emission calculations on Tables 2 through 6 have been provided.

FDEP Comment:

p.13 There appears to be a typo in the sentence, "containers having a capacity of greater than 46 m³..." Should this be 0.46m³?

Was not corrected.

CESF Response:

p.13 The figure has been changed to read correctly: 0.46m³

FDEP Comment:

Section 18

Attachment 2

p.2 Please explain how the storage location, by waste, is indicated on Attachment 5.12. Figure 5.12 neither identifies the bays of types of waste stored in each bay.

✓ OK

CESF Response:

p.2 Figure 5.12A has been added to this page. This figure provides the storage location, by waste, for each bay. Additionally, the Table of contents for Attachment 5 has been revised to include Figure 5.12A.

FDEP Comment:

Attachment 4

The information contained in Attachment 4 is not required and should be removed as the Department already has on file a copy of all permits and registrations that it has issued to CESF.

✓ OK

CESF Response:

The information contained in Attachment 4 has been removed as requested. The Title page "Permit List" has been left in place for reference purposes.

FDEP Comment:

Attachment 5

Figure 5.15 illustrates a carbon filter on the Stormwater Management System. To our recollection, from past compliance inspections of the facility, there were two carbon filters installed. Please revise the diagram to accurately show all the components of this system.

✓ OK

CESF Response:

Figure 5.15 has been revised to show two carbon filters.

FDEP Comment:

Attachment 8

Please provide a copy of the signed and sealed drawings as this was not found in the attachment.

✓ OK *CESF Response:*

Attachment 8 is provided as requested.

FDEP Comment:

Attachment 10

Please label the map of 'Area Zoning' as 10.3

Please identify CESF's location on the map labeled attachment 10.4

✓ OK *CESF Response:*

Labels are provided with the page revisions. Please affix the labels on the maps so that the Area Zoning Map will be labeled 10.3 and the location of CESF will be on map 10.4 as requested.

Section 2 Page Revisions

The attached page Revisions are provided to replace pages previously submitted. These revisions reflect the information as stated in Section 1 Comments/ Responses. In some instances pages have been added or deleted. The revision summary below describes each needed change.

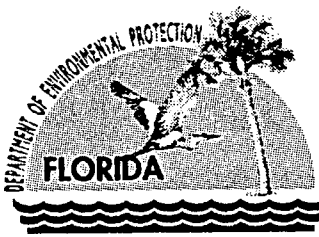
Revision Summary

Revision 00
Date: 3/27/00

Section 1, Title Page	replace
Section 2, Page 1	replace
Section 3, Page 1	replace
Section 4, Page 1	replace
Section 5, Page 1	replace
Section 6, Page 1	replace
Section 7, Page 1	replace
Section 8, Page 1	replace
Section 9, Page 1	replace
Section 10, Page 1	replace
Section 11, Page 1	replace
Section 12, Page 1	replace
Section 13, Page 1	replace
Section 14, Page 1	replace
Section 15, Page 1	replace
Section 16, Page 1	replace
Section 17, Page 1	replace
Section 18, Page 1	replace

Page 3 of 5 DEP Form 62-730.900(2)(a)	replace
Page 4 of 5 DEP Form 62-730.900(2)(a)	replace
Page 1 of 3 DEP Form 62-730.900(2)(c)	replace
Page 1 of 4 DEP Form 62-730.900(2)(d)	replace
Figure 5.12A	added
Figure 5.16	added
Section 2, Page 9	replace
Section 3, Page 6	replace
Section 5, Page 5	added
Section 6, Page 3	replace
Section 6, Page 6	replace
Section 6, Page 12	replace
Section 6, Page 13	replace
Section 6, Page 14	replace
Section 6, Page 21	remove
Section 7, Page 6	replace
Section 8, Page 2	replace
Section 8, Page 22	add
Section 8, Page 23	add
Section 8, Page 24	add
Section 8, Page 25	add
Section 8, Page 4	replace
Section 8, Page 10	replace
Section 8, Page 20	replace

Section 11, Page 21	replace
Worksheet TD-1 (TSDF and 10-Day Transfer)	replace
Worksheet TD-1 (TSDF Only)	replace
Worksheet CS-2 (TSDF and 10-Day Transfer)	replace
Worksheet CS-2 (TSDF Only)	replace
Section 14, Page 9	replace
Section 14, Page 11	replace
Section 14, Page 16	replace
Section 14, Page 17	replace
Section 15, Page 4	replace
Section 15, Page 7	replace
Section 16, Table 2	add
Section 16, Table 3	add
Section 16, Table 4	add
Section 16, Table 5	add
Section 16, Table 6	add
Section 16, Page 13	replace
Section 18, Page 2	replace
Section 18, Page 3	replace
Section 18, Attachment 4	remove all pages following title page
Section 18, Attachment 5, Figure 5.15	replace
Section 18, Attachment 5 (Table of Contents)	replace
Section 18, Attachment 8 (Title Page)	replace
Section 18, Attachment 8	add signed/sealed originals
Section 18, Attachment 10.3	affix label to attachment
Section 18, Attachment 10.4	affix label to attachment



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

February 25, 2000

Mr. Michael D. Knox
Technical Services Manager
USL City Environmental Services of Florida, Inc.
7202 East 8th Avenue
Tampa, Florida 33619

RE: ***USL City Environmental Services (CESF) FLD 981 932 494
Operating Permit Application 34875-HO01-002
First Notice of Deficiency***

Dear Mr. Knox :

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

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

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

In preparing your response, the Department recommends that the response be addressed in two sections. The first section should identify each of the Departments' comments followed by your response. The second section should contain the revised pages to be inserted into the application. In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0")

"More Protection, Less Process"

Printed on recycled paper.

FILE: 4-C

02/00

until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

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

Sincerely,



Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

Attachment

cc: Narindar Kumar, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee

General/ USL/ Operating Permit/ USL-OPnod1

NOTICE OF DEFICIENCY

General

Permit number HO29-263213 is identified on page 1 of each section. This should be replaced with the appropriate application number 34875-HO01-002.

Section 1 Application

Page 3 of 5 of DEP Form 62-730.900(2)(a)

- Registrations as a Hazardous Waste Transporter and Used Oil Collection & Transport are not permits but annual notifications of these activities to the Department. Please revise the table to identify only environmental permits that the facility has applied for or received.

Page 4 of 5 of DEP Form 62-730.900(2)(a)

- Item B.1 What does N2752.5 – W8215/7.5 represent? From the Latitude and Longitude provided by CESF, the corresponding UTM# is **NORTHING** =3093.760 km, **EASTING** =364.940 km and **ZONE** =17. This is represented as 17/ 364940/ 3093760. Please revise the application to include this UTM#.

Page 1 of 3 of DEP Form 62-730.900(2)(c)

- What and where is the surface impoundment that CESF claims to have on-site?

Page 1 of 4 of DEP Form 62-730.900(2)(d)

- The owner or authorized representative must provide an original signature for the "Operator" of the facility. Please provide an original form containing the appropriate signature.

Section 2 General Information

p.5 The second and third paragraph makes reference to Figure 5.12A which was not found in the application. Please provide this figure.

p.8 Please include a table or otherwise describe in the text what waste categories are stored in which storage bay (e.g., Flammable – Bay 2).

p.9 Please revise the text to identify the locations within the facility where recontainerization operations and paint can crushing will be performed. This was not identified in Attachment 5.12 as indicated in the text.

Section 3 General Facility Standards

p.6 The Department has observed Bay 2 being used to store 'cyanide bearing' waste and flammable acid waste at the same time. Cyanides and acids are incompatible. It is acknowledged that CESF stores flammable acids in Bay 2 based on the determination that the flammability classification is generally the 'primary' waste category. However, to alleviate potential compability problems, the Department strongly recommend that either:

- 1) All 'cyanide bearing' wastes be provided with secondary containment (which meets 40 CFR 264 Subpart I requirements) that is independent of Bay 2; or
- 2) All 'cyanide bearing' wastes be stored in the southeastern corner of Bay 2 (the area highlighted in the attached figure).

'Cyanide bearing' waste include D003 wastes that meet the definition under 40 CFR 261.23(a)(5) and any 'listed' wastes that has any form of cyanide as a 'Basis for Listing' under 40 CFR 261 Appendix VII (e.g., F006 – F012, F019, K007, K060, etc.).

p.8 The text references Bays 1 , 2 and 3. Please provide a drawing that identifies the locations of the three bays.

Section 5 Inspection Plan

p.3 The second paragraph states, "inspections will be reviewed and approved by a senior CESF employee". Please include a 'sign-off' line on the inspection log to verify that the review and approval was completed.

p.4 According to the text, a copy of CESF's Inspection Log was included in the application. Please provide a copy of the Inspection Log as this was not found in the application.

Section 6 Training Programs

p.3 Identify in the first paragraph where the Contingency Plan training received by off-site CESF personnel, that may visit the facility infrequently, is documented.

p.6 The training course outline shows the 'Contingency Plan Implementation' is completed twice. If this is the case, please identify the difference between the two.

p.12 The heading 'JOB DESCRIPTION' at the bottom of this page needs to be removed and inserted at the top of page 13.

p.13 The heading 'JOB DESCRIPTION' at the bottom of the page needs to be removed and inserted at the top of page 14.

p.21 The chart on this page is identical to the chart on page 20. Is this a duplicate copy or did CESF intend to include a different chart?

Section 7 Preparedness and Prevention

p.6 As CESF presently manages mercury lamps, they should include in their spill control equipment what they will be using to clean up broken lamps (eg. HgX) to amalgamate any mercury residue and reduce emissions.

Section 8 Contingency Plan and Emergency Procedures

The Contingency Plan is to be a 'stand alone' document and hence all figures, attachment, etc. are to be included in the plan.

p.4 The last sentence in the second paragraph is redundant as it repeats a previous sentence. Please remove the last sentence from the text.

p.10 Please modify the FDEP-Tallahassee area codes from 904 to 850.

p.20 The 'Decontamination Procedures' should also address the cleanup for mercury spills.

Section 11 Closure Plan

p.21 Please provide an estimated timeline (e.g. days) for each of the seven tasks to be performed for final closure of the facility.

Worksheet TD-1, Step1 -The calculated value for the Treatment and Disposal of Waste (TD-2) for TSDF and TSDF + Transfer Operations appears to be incorrect. Please recalculate this value.

Note: Please recalculate any other worksheets that these calculations may have impacted.

Section 14 Processes, Procedures, Structures, and Equipment

p.4 Please expand on what is meant by, "Bulk hazardous waste manifested to CESF to be shipped off-site, will be shipped off-site within 24 hours of arrival at the CESF facility (if the load is not unloaded into the warehouse or *being added into*)".

p.4 The third paragraph makes reference to Figure 5.12A which was not found in the application. Please provide this figure.

p.9 If CESF intends to crush fluorescent lamps that are managed as a hazardous waste they must identify the lamp crusher as a treatment unit and meet all applicable requirements of 40 CFR 264 Subpart X.

p.11 Provide a description within the application that describes how and where containers which held acute hazardous waste will be triple rinsed or otherwise rendered 'empty' at the CESF facility.

p.16 The third paragraph indicates that the stormwater is pumped through a carbon filter. To our recollection, from past compliance inspections of the facility, there were two carbon filters installed. Please revise the text to accurately describe this area.

p.17 The text identifies that the retention pond retains filtered stormwater. Does the pond also collect non-filtered stormwater from roof drains?

p.17 Please describe how backflushed waste from the sand filter is collected prior to making a waste determination.

Section 15 Miscellaneous Unit

p.4 The title of Attachment 2 within the parenthesis is not the Hazardous Waste Process Code List. This should be corrected to be consistent.

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p.9 The emission calculations on Tables 2 through 6 were not provided.

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Section 18

Attachment 2

p.2 Please explain how the storage location, by waste, is indicated on Attachment 5.12. Figure 5.12 neither identifies the bays or types of waste stored in each bay.

Attachment 4

The information contained in Attachment 4 is not required and should be removed as the Department already has on file a copy of all permits and registrations that it has issued to CESF.

Attachment 5

Figure 5.15 illustrates a carbon filter on the Stormwater Management System. To our recollection, from past compliance inspections of the facility, there were two carbon filters installed. Please revise the diagram to accurately show all the components of this system.

Attachment 8

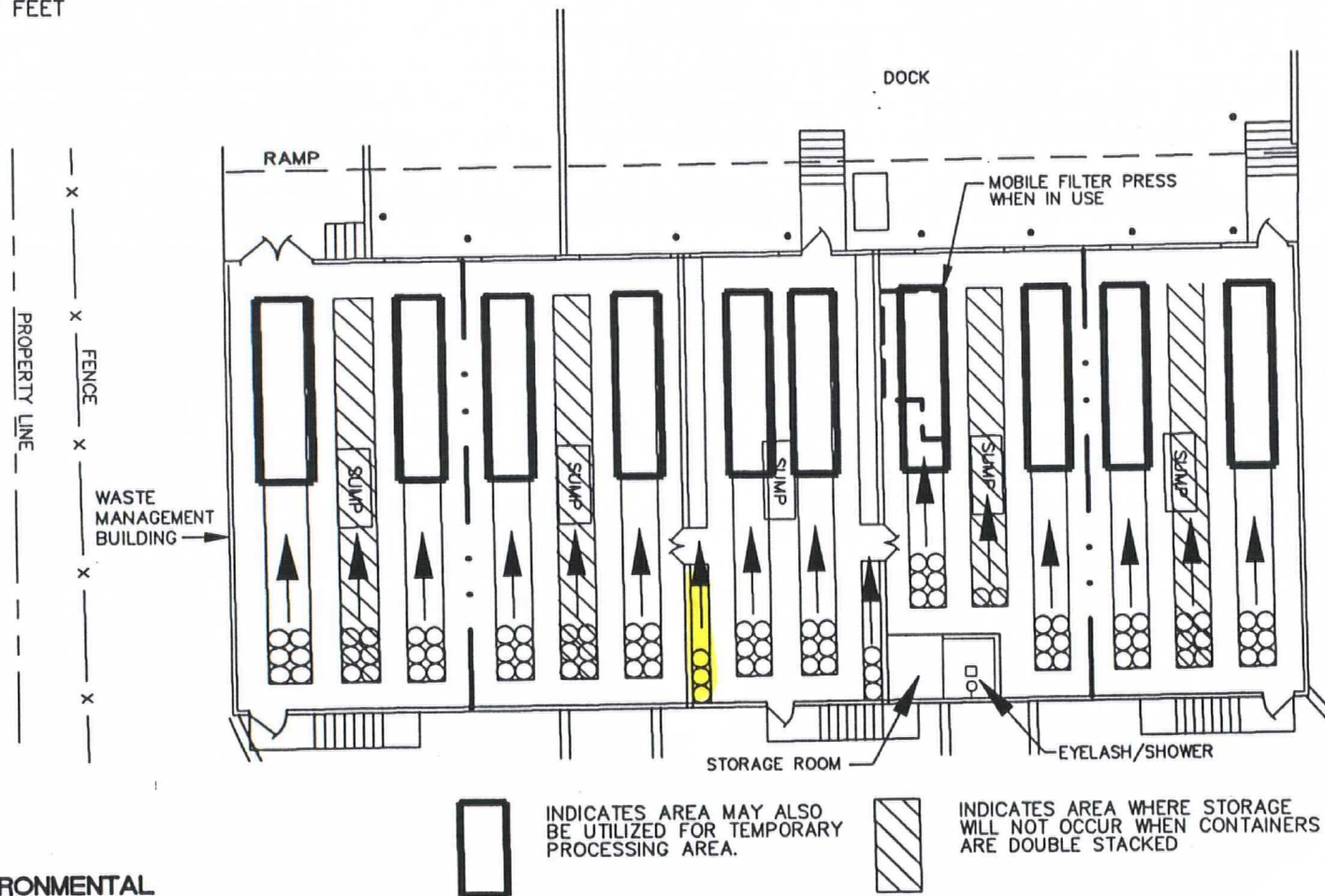
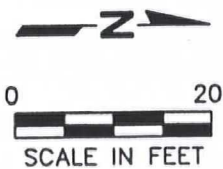
Please provide a copy of the signed and sealed drawings as this was not found in the attachment.

Attachment 10

Please label the map of 'Area Zoning' as 10.3

Please identify CESF's location on the map labeled Attachment 10.4

G:\PROJECT\0999034.00\Fig5-12.dwg October 29 1999 2:34pm By:1916xrh



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

7202 EAST EIGHTH AVENUE
TAMPA, FLORIDA 33619

SOURCE: SCS ENGINEERS, 1999

SCS ENGINEERS

Figure 5.12. Container Storage Building Diagram.

State of Florida
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: Stanley Tam, Professional Engineer II, Tampa
Hazardous Waste Regulation *ST*

FROM: Roger Evans, Permitting Engineer, Tampa
Hazardous Waste Regulation *RE*

DATE: January 10, 2000

SUBJECT: **USL City Environmental Services, FLD 981 932 494**
Operating Permit File No. 34875-HO01-002
Operating Permit Renewal Application

Attached, please find a permit renewal application submitted December 30, 1999. The package includes the following items:

- A cover letter from City Environmental Services
- Two three ring binders (Vol. 1 of 2 and Vol. 2 of 2)

The District intends to manage this renewal in the following manner:

1. The pages in the renewal application will be reviewed for compliance with current regulations;
2. The pages in the renewal application will be reviewed for consistency with the pages of the current operating permit application;
3. Any deficiencies in items 1 or 2 will be addressed in a Notice of Deficiency letter until corrected;
4. Once the application is deemed complete, the revised pages will be inserted into the application.

Please provide any comments by February 18, 2000.

Attachments

cc Narindar Kumar, Chief RCRA Branch, EPA Region IV

City/34875-HO01-002/CEStran1.doc

File: 4-C
01/00

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

30 December, 1999

Attention: Stanley Tam
Roger Evans

Re: Hazardous Waste Operating Permit Renewal
I.D. No.: FLD 981 932 494
Permit No.: H029-263213

D.E.P.
DEC 30 1999
Southwest District Tampa

Dear Mr. Tam,

Enclosed is the USL City Environmental Services of Florida, Inc. (CESF) Hazardous Waste Operating Permit Renewal. The submittal includes four (4) copies of two (2) volumes, in three-ring binders. Enclosed also is a certified bank check for \$25,000 that includes \$10,000 which is for this permit renewal fee. The additional \$15,000 is for the construction application being submitted concurrently.

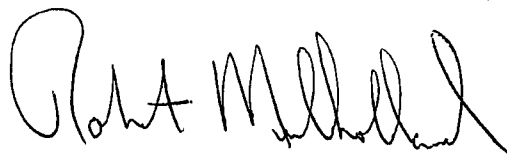
The renewal submittal is for USL City Environmental Services of Florida, Inc. Hazardous Waste Operating Permit No. HO 29-263213, Facility ID No. FLD 981 932 494, with the existing permit expiration date of 03 July 2000. The submittal is more than 180 days prior to the existing permit expiration date as required by FDEP regulations.

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

Sincerely,



Michael D. Knox
Technical Services Manager



Bob Mulholland
Facility Manager

MDK:mdk

Enclosures: 4 ea. Permit Renewal (Volume one of two)
4 ea. Permit Renewal (Volume two of two)
1 check for \$25,000 (\$10,000 for permit renewal fee)

