

Certified Mail Receipt # P 644 593 443

March 18, 1994

Ms. Beth Knauss  
Hazardous Waste Section  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL. 33619

RE: Vacuum Still  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA I.D. # FLD 980 729 610

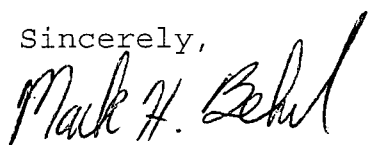
Dear Ms. Knauss:

The vacuum still at LESB needs repairing or replacing. LESB has decided to replace the unit instead of repairing it. The replacement unit will be the same size (1800 gal) as the one being replaced. The only difference in the two units is the old unit has a steam tube bundle as a heat source and the new unit will have a steam jacket as a heat source. This minor difference will not create an increase in the vent emissions subject to 40 CFR Part 264, Subpart AA.

Although the vacuum still unit itself is not a regulated unit, LESB is submitting this information to the FDEP so the Department will be aware of the change.

If you have any questions feel free to call me at (813) 533-6111.

Sincerely,



Mark Behel  
Safety and Compliance Manager

pc: Ashley Chadwick  
Lin Longshore  
Mike Merashoff

**RECEIVED**  
MAR 21 1994

BY \_\_\_\_\_  
SOUTHWEST DISTRICT

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

**Date:** 01-Mar-1994 09:01am EST  
**From:** Beth Knauss TPA  
KNAUSS\_B  
**Dept:** Southwest District Offi  
**Tel No:** 813/744-6100  
**SUNCOM:** 542-6100 Ext. 383

**TO:** Lynne Milanian TPA

( MILANIAN\_L )

**Subject:** Laidlaw

*SPOKE w/BETH ON THIS ISSUE MAR 1, 94*

Lynne,

I got your letter to Laidlaw about the drum crusher. The guidance memo is not the final word. A drum shredder may not be the same as a drum crusher. A lot depends on the unit's design. Laidlaw could design their crusher to be part of their tank system, making it ancillary equipment regulated under Subpart J. All it would take is piping the waste outlet to the tank system. Would this be a minor modification?

Beth



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619  
813-744-6100

Virginia B. Wetherell  
Secretary

February 28, 1994

Mr. Mark Behel  
Safety and Compliance Manager  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Re: ***Laidlaw Environmental Services of Bartow, FLD 980 729 610***  
***Operating Permit No. HO53-182726***  
***Operation of Two Can Crushing Units***

Dear Mr. Behel:

The Florida Department of Environmental Protection (FDEP) has completed its review of the package dated December 2, 1993 which pertained to management of two can crushing devices proposed to force liquid material hazardous wastes out of small containers for placement of the liquid hazardous waste into larger containers.

I had originally perceived that Laidlaw had intended to place "empty" containers of hazardous waste in these units and crush the containers, which would be sold for scrap, while previously drained hazardous waste would either be properly disposed or managed as a fuel grade material, based on analysis. This scenario would not require a RCRA permit.

The revised narrative submitted explaining the can crushing unit devices, however, indicates that hazardous wastes will still be present in the containers prior to their being crushed. In this event, the can crushing units are managing "non-empty" containers. This is processing of containers filled with hazardous waste in a manner that constitutes treatment of a hazardous waste. As the can crushing units have not been designed to contain an accumulation of hazardous waste, they will not meet the regulatory definition of a tank as per 40 CFR Part 260.10, but instead will require a RCRA permit as a miscellaneous unit as per 40 CFR Part 264.600.

Laidlaw must decide which of the above scenarios will be most beneficial. Should you decide to drain all containers prior to crushing, a resubmittal revising the narrative will be necessary before processing the minor modification to your operating permit. Should you decide to manage the can crushing units as miscellaneous units, a resubmittal meeting the requirements of Subpart X, along with a major modification processing fee will be necessary in order to amend your operating permit.

2994

For your consideration, a copy of EPA's interpretation of processing containers filled with hazardous waste is enclosed. Should you have any questions concerning these issues, do not hesitate to contact me at (813) 744-6100, extension 372.

Sincerely,



Lynne R. Milanian  
Permitting Engineer  
Hazardous Waste Program  
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV  
Satish Kastury, Administrator, FDEP - Tallahassee  
Beth Knauss, Enforcement/Compliance, FDEP - Tampa

lesb.doc



(PB92-111707). The entire compendium can be purchased from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, VA 22161, (703) 487-4650, at a cost of \$406. For the convenience of our subscribers who decide to purchase the memos from NTIS, we have prepared a cross-reference listing the RDB memo numbers (the four-digit number given in bold type following each excerpt) and the EPA numbers, which are used to identify the memos in the *Compendium*. The cross-reference, which appears as columns 3 and 4 in Table 1, can be used to locate the complete text of all of the documents cited in this article.

2. McCoy and Associates will provide copies of any of the RDB memos referenced in this article. A copying charge of \$.50 per page (\$15 minimum), plus \$5 shipping and handling (prepaid) will apply. Inquiries to obtain these documents should be accompanied with the appropriate RDB number(s). Note that copy quality is sometimes poor due to the condition of the original documents.

## Treatment Issues

### Treatment in Accumulation Tanks

**Q** Can generators solidify hazardous wastes in accumulation tanks without a RCRA permit?

**A** Yes. EPA does not require a permit or interim status for a generator who treats a waste when it is in an accumulation tank or container in compliance with §262.34 if the treatment takes place within the period of accumulation.

[April 16, 1986: 5796; 2 pages]

### Incidental Dilution vs. Treatment

**Q** In a laboratory, small parts are dipped into a 50% water/50% alcohol mixture in small trays. This is a batch operation that occasionally requires the operators to carry the trays with spent dip solution to the drain. About 12 gallons per day of the waste is poured down the drain that leads to an industrial wastewater treatment plant. This plant handles 1.8 million gallons per day and includes biological treatment. "Does the dilution of the noncorrosive, unlisted, characteristic hazardous waste to a nonhazardous

condition constitute hazardous waste treatment if the dilution occurs in a sewer line leading to an industrial wastewater treatment plant after the waste is poured into the drain from a container?"

**A** "Treatment is defined in §260.10 as . . . designed to change the physical, chemical, or biological character or composition of any hazardous waste . . . to render such waste nonhazardous, or less hazardous, safer to transport, store, or dispose of . . ." Pouring the 50% water/50% alcohol ignitable waste down the drain renders the waste nonhazardous by the time it reaches the treatment plant. In this case, pipes are designed and used to convey, not treat, wastes to the biological treatment plant that degrades the alcohol. Thus, the dilution is incidental to the transport of the waste to the wastewater treatment plant where treatment takes place. Therefore, in this case the dilution is not treatment; and, if properly handled, this practice can be environmentally more acceptable than storing drums of the ignitable waste for offsite treatment or recycling."

[August 19, 1986; 5607; 5 pages]

### Drum Shredding Operations

**Q** A TSD facility operates a drum shredder. Is the drum shredding operation regulated under RCRA?

**A** "Yes, the drum shredding unit is processing containers filled with hazardous waste in a manner that constitutes treatment of hazardous waste. Since the drum shredder was not designed to contain an accumulation of hazardous waste, it does not meet the regulatory definition of a tank (40 *CFR* §260.10); this activity will require a RCRA permit as a miscellaneous unit under 40 *CFR* §264.600 (Subpart X).

[June 24, 1988; 5645; 3 pages]

## Exclusions and Exemptions

### Oil and Gas Exploration and Production Wastes

**Q** Under §261.4(b)(5), "drilling fluids, produced waters, and other wastes associated with the exploration, development, or production of crude oil, natural gas, or geo-

thermal energy" are excluded from the definition of hazardous waste. Does this exclusion apply to waste "iron sponge" generated during the sweetening of natural gas?

**A** "Waste iron sponge is not within the [§261.4(b)(5)] exemption and, therefore, is subject to the hazardous waste regulatory program.

"The key words in [§261.4(b)(5)], 'exploration, development, or production,' all relate to locating oil and gas deposits of commercial value and extracting the oil and gas from those deposits. The only wastes specifically listed in the exclusion are 'drilling fluids' and 'produced waters.' These are substances that were originally extracted from the ground together with the desired oil or gas or that were injected into the ground to enhance extraction of the oil or gas. They do not result from any process other than physical separation from the product. It is therefore reasonable to conclude that 'other wastes' should similarly be materials extracted from the ground or injected into the ground to enhance oil or gas recovery and not wastes resulting from subsequent processing and manufacturing.

"The iron sponge process goes beyond physical separation of the gas from other produced materials or drilling fluids to processing the gas through a chemically treated material. It is thus a processing operation that is downstream from the production operations."

[May 25, 1983; 5576; 6 pages]

**Q** Has EPA developed any criteria for determining whether a waste is eligible for the oil and gas exploration and production waste exclusion in §261.4(b)(5)?

**A** "The legislative history of Section 3001(b)(2)(A) of RCRA sheds some light on the identity of oil and gas and geothermal energy wastes subject to exemption:

"The term 'other wastes associated' is specifically included to designate waste materials intrinsically derived from the primary field operations associated with the exploration, development, or production of crude oil, natural gas, or geothermal energy. It would cover such substances as hydrocarbon-

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FEB 1-0 1994

## STATE OF FLORIDA

## TRANSFER FACILITY NOTIFICATION FORM

D.E.P. Southwest District

This form must be completed as required in Florida Administrative Code Rule 17-730.171(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-730.171. All information must be typed or printed clearly.

## I. Transporters Identification:

Company Name Laidlaw Environmental Services of Bartow, Inc.EPA ID No. FLD 980 729 610Company Mailing Address 170 Bartow Municipal Airport  
Bartow, FL 33830Principal Contact MARK BEHELPhone Number (813) 533-6111

## II. Transfer Facility Identification:

Name of Facility Laidlaw Environmental Services of Bartow, Inc.Street Address 170 Bartow Municipal Airport  
Bartow, FL 33830Latitude 27° 57' 05" N Longitude 81° 47' 09" WCounty PolkWaste Codes ALL "D" ALL "F" ALL "K" ALL "P" ALL "U" codesStorage Volume 81,180 gallons (covered) 353,430 gallons Uncovered


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FEB 11 1994



III. Certification

I CERTIFY UNDER PENALTY OF LAW THAT THE ABOVE INFORMATION IS ACCURATE AND COMPLETE. AS THE OWNER OR OPERATOR OF THE ABOVE REFERENCED HAZARDOUS WASTE TRANSFER FACILITY, I ALSO CERTIFY THAT THIS FACILITY IS IN COMPLIANCE WITH ALL PROVISIONS OF FAC 17-730.171.

Michael Merashoff Facility Manager  
[Type Name] [Title]

 2/2/94  
[Signature of Authorized Representative] [Date Signed]

Please complete this form and mail to the following address:

Florida Department of Environmental Regulation  
Hazardous Waste Management Section  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

## Memorandum

## Florida Department of Environmental Protection

*Standard Through Log Feb 10/94 @ 2:50 PM*

**DATE:** February 10, 1994

### ***ROUTING TRANSMITTAL SHEET***

**TO:** Beth Knauss, Compliance/Enforcement  
Gil Dembeck, Compliance/Enforcement  
Hazardous Waste Regulation, Tampa, - Southwest District

**FROM:** Lynne R. Milanian, District Permitting Engineer *LRM 2/10*  
Hazardous Waste Regulation, Tampa - Southwest District

**COMMENT:**

Please find attached information submitted by Laidlaw to address operation of two can crushing units at the Bartow facility. They have requested written acknowledgement of these activities from the FDEP. I have drafted a letter indicating our position. Let me know if you are in agreement.

*Do not agree  
units must be permitted  
if they manage non-empty  
containers  
- 2 choices - ancillary equipment  
under Subpart J  
or Subpart X unit*



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
February 9, 1994

Virginia B. Wetherell  
Secretary

Ms. Cindy Taylor  
RCRA Compliance Coordinator  
220 Outlet Pointe Boulevard  
Post Office Box 210799  
Columbia, South Carolina 29221

RE: FLD 980729610 - Laidlaw Environmental Services - Bartow, Florida

Dear Ms. Taylor:

I reviewed the documentation submitted to demonstrate proof of financial assurance and liability coverage and find it is in order. The amendment to Letter of Credit #1269/S00588 dated August 28, 1990, increasing the credit amount to \$271,004 is adequate to cover your 1993 department approved closure cost estimate. Also, the liability coverage obtained through National Union Fire Insurance Company meets the requirements of 40 CFR Part 264.147. Therefore, Laidlaw Environmental Services, Bartow, Florida, is in compliance with 40 CFR Part 264 Subpart H at this time.

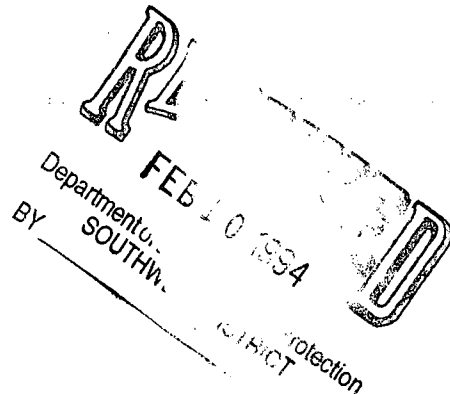
If you have any questions, call me at (904) 488-0300.

Sincerely,

Rita Pate  
Solid and Hazardous Waste Section

RFP

cc: Fred Wick  
Jeff Pallas  
Michael Hatcher  
Merlin Russell  
✓ Gary Santti



Certified Mail # P 809 530 398

January 31, 1993

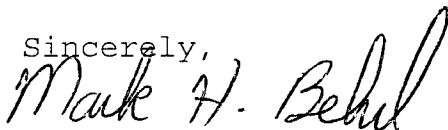
Ms. Lynne Milanian  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: Requested Information  
Class 1 Permit Modification  
Laidlaw Environmental Services of Bartow, Inc.  
EPA ID # FLD 980 729 610  
Permit # HO53-182726

Dear Ms. Milanian:

As you requested in our telephone conversation on January 31, 1994, enclosed are three copies of the information submitted to your office on December 2, 1993. If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel  
Safety and Compliance Manager

Enclosures:

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore

**RECEIVED**  
FEB 03 1994

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

2594

Certified Mail # P 644 593 402

December 2, 1993

Ms. Lynne Milanian  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

*Give any concerns  
over these 2 can  
crushers? Please  
w/paper clips note  
their narrative. Lynne*

RE: Requested Information  
Class 1 Permit Modification  
Laidlaw Environmental Services of Bartow, Inc.  
EPA ID # FLD 980 729 610  
Permit # HO53-182726

Dear Ms. Milanian:

We have discussed in telephone conversations on November 4, 1993 and November 19, 1993, above mentioned permit modification. In those conversations you requested additional information concerning the can crushers. Enclosed is the additional requested information (3 copies).

Chapter One was revised to include the can crushers in the general description of the permit. The additional information is included on pages 1-1 and 1-7. The revised Chapter One is enclosed in Attachment A.

Chapter Six was revised to include the can crushers on the weekly inspection checklist. The additional information is included on pages 6-1 and 6-4. The revised Chapter Six is enclosed in Attachment B.

Chapter Nine was revised to include the can crushers in the contingency plan. The additional information is included on page 9-4. The revised Chapter Nine is enclosed in Attachment C.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,

*Mark H. Behel*

Mark H. Behel  
Safety and Compliance Manager

Enclosures:

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore

**RECEIVED**  
DEC 03 1993

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

*24/94*

## CHAPTER ONE

### DESCRIPTION OF OPERATION

#### 1.1 Introduction

##### 1.1.1 Process Summary

Laidlaw Environmental Services of Bartow, Inc. (LESB) is in the business of reclaiming and storing hazardous waste. The objective is to reclaim hazardous waste to the extent that the recycled product will meet the manufacturing specifications of the industries from which the waste materials were received (see Figure 1.1). Solvents and other wastes that cannot be reclaimed will be blended into hazardous waste fuel. Should the waste not qualify for reclaiming or fuels blending it will be shipped off-site to a permitted hazardous waste facility.

A vacuum still, a thin-film evaporator, a freon wash tank and a fractionation column will be used to reclaim waste solvents. The freon wash tank, vacuum still and the thin-film evaporator will be used to remove the major contaminants from the waste solvents. Trace contaminants will be removed via a fractionation column. The fractionation column will also be employed for the separation of solvent mixtures.

In general, solvents that cannot be reclaimed, as well as sludges and still bottoms, are blended into hazardous waste fuels. For this process, agitated mix tanks are used to develop the blends (see Figure 1.1a).

LESB also uses two can crushers to transfer hazardous waste from smaller containers to larger ones. These can crushers are located (when operating; one of them is rarely used) in the fuels blending area of the drum storage building (see Figure 1.2). The waste is transferred with the can crushers by two methods. One is, the waste is emptied into the trough of the can crusher or directly into the receiving drums. When emptied into the trough the waste then drains into a receiving drum from the trough. After the cans have been emptied, the empty cans are then crushed by the can crushers. The second method is to open the can's lid or punch a hole in the can and then crush them with the material initially remaining in the can and the crushing action forces the material out of the can into a receiving drum. Generally the cans range in size from one-half pint to five gallon. After the material is placed in the receiving drums it is analyzed (see Chapter 4) to determine if it can be managed as a fuel grade material. The can crushers are located within the same secondary containment structure as the fuels blending equipment. The waste codes typically transferred by the can crushers are listed in Table 1.4. The crushed empty cans are disposed of off-site or sent off-site as scrap metal.



TABLE 1.3

WASTE CODES TYPICALLY AMENABLE TO FUELS BLENDING

D001, D018, D019, D028, D029, D030, D035, D039, D040,  
F001, F002, F003, F005, F037, F038,  
K048, K049, K050, K051, K052, K083, K086,  
U002, U019, U031, U044, U057, U077, U112, U117, U121, U140, U154,  
U159, U161, U171, U196, U210, U211, U220, U226, U227, U228, U239

\*\*\*\*\*

TABLE 1.4

WASTE CODES TYPICALLY TRANSFERRED IN THE CAN CRUSHERS

D001, D018, D035,  
F003, F005,  
U002, U019, U031, U057, U077, U117, U140, U154, U159, U161, U210,  
U220, U226, U228

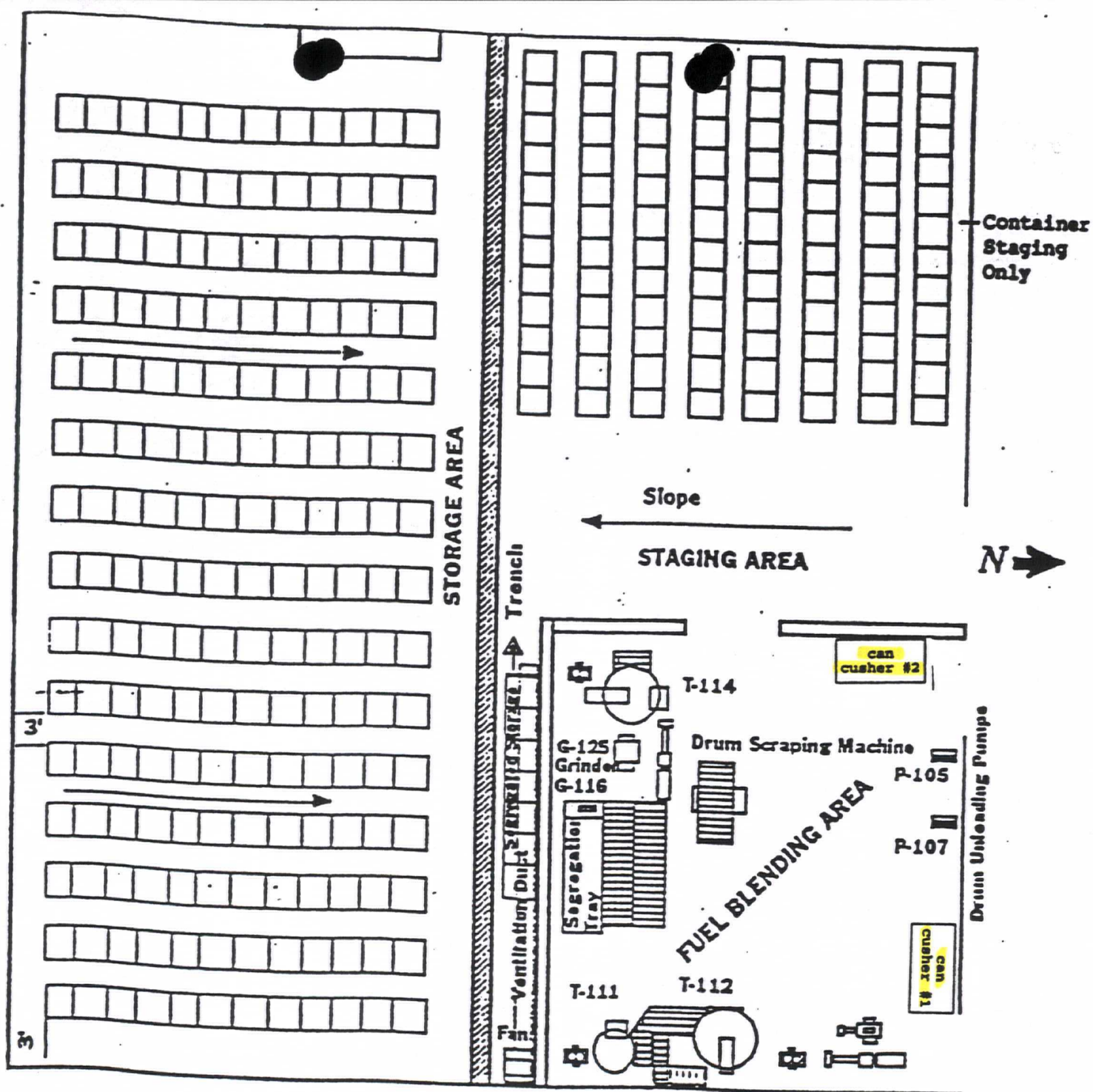


Figure 1.2 Drum Storage Building  
Drum Storage, Staging, and Fuel Blend Processing Areas

## CHAPTER SIX

### INSPECTIONS

#### 6.1 General Inspection Requirements

LESB will be conduct regular inspection to detect malfunctions, deterioration, operator errors, and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health. The schedule for inspection as well as all equipment, structures and devices to be inspected are described below. The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident. Unless otherwise indicated, all inspection records will be maintained on-site by the Emergency Coordinator for at least three years.

#### 6.2 Daily Inspections

At least once each operating day the following items will be visually inspected:

- above ground portions of the tank system to detect corrosion or releases of waste;
- construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system to detect erosion or signs of releases of hazardous waste.
- areas subject to spills, such as loading and unloading areas.

Daily inspections will be recorded on the Daily Tanks Inspection Check list (see example, Figure 6.1).

#### 6.3 Weekly Inspections

On a weekly basis, areas where containers are stored will be inspected for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. The Can Crushers will also be inspected on a weekly basis for deteriorating or malfunctioning equipment. Weekly inspections will be documented on the Weekly Container Can Crushers and Driveway Inspection Checklist (see example, Figure 6.2).

Safety and Emergency Equipment will be inspected on a weekly basis according to the Weekly Safety and Emergency Equipment Inspection Checklist (see example, Figure 6.3).



## Year \_\_\_\_\_

✓ No Problem      \* Potential Problem, See Comments

Figure 6.2 Weekly Container, Can Crushers and Driveway Inspection Checklist

#### 9.2.2.2 Large Spills.

Liquid from this type of spill will be contained by the perimeter road, which is curbed on each edge and sloped to the center (3-inch pitch across 24-foot width). Liquids collected on the perimeter road drain to a sump. The contents of the sump will be transferred to the appropriate vessel in the hazardous waste tank farm. If the spill is not large enough to reach the sump area, the liquid on the road will be removed using absorbent.

#### 9.2.3 Response to Release in the Drum Storage Building

All releases in the building, including those that may result from emptying containers into mix tanks and operation of the can crushers, will be contained by the building's impervious concrete floor, which is diked on all sides and sloped to a centerline trench. This containment system will prevent the spread of any releases involving hazardous waste. To prevent the recurrence of releases, the Emergency Coordinator will assess the cause of a spill or other release after it occurs and assess the factors which led to the release. He will then take steps to ensure that the release does not recur, by personnel training, equipment modifications, or changes in waste management procedures.

#### 9.2.4 Response to Releases from Tanks

Releases from tanks may be due to either overfilling a tank or a breach in the tank wall. Both types of release will be captured by the secondary containment system.

A release due to a breach in the tank wall will require transfer of hazardous waste from the tank and containment system to a compatible tank in good condition. In order to facilitate the characterization of waste release from a tank system, all tanks are numbered. By identifying the number of the tank from which a release is occurring and checking the Daily Material Report, the identity of a waste can be quickly determined.

The notification to the Emergency Coordinator and Operations Manager will include the following information:

- identity of tank,
- chemical in the tank, and
- volume of liquid in the tank.

The flow of waste to a breached tank system will be stopped by closing off the valve or pump system feeding the tank. If it is necessary to cease operations due to a release from a tank, the associated valves, pipes, and other equipment will be monitored to detect leaks, pressure build-up, gas generation, and ruptures.

*Lynn Mil-<sup>nika</sup>*

Certified Mail # P 644 593 427

December 22, 1993

Mr. Richard Garrity, Director  
Southwest District Office  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

**RECEIVED**  
DEC 23 1993

Department of Environ...  
BY SOUTHWEST DISTRICT

RE: Waste Minimization Program Certification  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA I.D. # FLD 980 729 610  
Permit # HO53-182726A 4-1

Dear Mr. Garrity:

Enclosed is the Annual Waste Minimization Certification for LESB. It is being submitted as required by permit condition I.12. of the Specific Conditions of the facility's Hazardous Waste Permit.

If you have questions or need additional information feel free to contact me at 813-533-6111.

Sincerely,

*Mark H. Behel*

Mark H. Behel  
Safety and Compliance Manager

enclosure

pc: E. Lin Longshore  
Ashley Chadwick  
Mike Merashoff

**WASTE MINIMIZATION PROGRAM POLICY STATEMENT**

It is the policy of Laidlaw Environmental Services of Bartow, Inc., management to support waste minimization at the Bartow Facility and to have an active waste minimization plan. The Bartow management promotes employee awareness of and training programs designed to involve employee in waste minimization planning and implementation. It shall be the Bartow management practice to ensure waste minimization plans are part of ongoing efforts with respect to capital planning, production operations, and maintenance.

The waste minimization plan shall include steps to identify types, amounts, and hazardous constituents of waste streams throughout the facility, as well as, to provide for periodic waste minimization assessments. The waste minimization assessment should include steps to prevent waste generation or promote recycling at all possible points in the process. The waste minimization plan shall include specific steps for identifying waste management costs and for developing specific accountabilities for waste minimization.

The Bartow management will make efforts to seek and exchange technical information on waste minimization with other parts of LESI, other firms, trade associations, technical assistance programs, and professional consultants. Finally, the Bartow management will perform at minimum annual evaluation of the program in order to verify program effectiveness and revise the program as required.

  
Michael Merashoff  
Facility Manager  
December 22, 1993

## Memorandum

## Florida Department of Environmental Protection

TO: Satish Kastury  
Administrator, Tallahassee

THRU: Gary Santi, Professional Engineer II, Tampa  
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *lyme 12/10*

DATE: December 10, 1993

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit File No. HO53-182726*  
*Permit Modification for Useage of Can Crusher*

---

Attached are documents dated December 2, 1993 and submitted December 3, 1993 which are subject to the noted permit.

This package details:

1. One single page cover letter.
2. One package containing narrative to replace the original application pages.

lrm

Attachment

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

lesbtran.doc



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

## Interoffice Memorandum

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To: Satish Kastury  
Administrator, Tallahassee

Thru: Gary Santti, Professional Engineer II, Tampa  
Lynne Milanian, District Engineer, Tampa *12/1*  
Hazardous Waste Regulation

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

Date: December 1, 1993

Subject: ***Laidlaw Environmental Services of Bartow, FLD 980 729 610***  
***Operating Permit HO53-182726***  
***Minor Permit Modifications***

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Please find attached documents dated October 28 and November 19, 1993. This package contains the following information:

1. One single page cover letter from Laidlaw.
2. Previously submitted two page cover letter from Laidlaw.
3. Attachments A, B & C

Please provide any comments you may have within 30 days.

Attachments

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

Certified Mail # P 644 593 409

November 19, 1993

Ms. Lynne Milanian  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

**RECEIVED**  
NOV 23 1993  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

RE: Requested Information  
Class 1 Permit Modification  
Laidlaw Environmental Services of Bartow, Inc.  
EPA ID # FLD 980 729 610  
Permit # HO53-182726

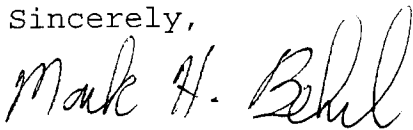
Dear Ms. Milanian:

Enclosed are the two additional copies of the 10-28-93 submittal requested in our telephone conversation on 11-4-93.

Also, as discussed in the same 11-4-93 telephone call and a second telephone call on 11-19-93, the additional information requested concerning the paint can crushers will be submitted at a later date. Additional time is needed to compile the requested information. I plan to submit the additional information in the first week of December, 1993.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel  
Safety and Compliance Manager

Enclosures:

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore

Certified Mail # P 809 530 435

**D.E.P.**

October 28, 1993

**NOV - 1 1993**

**SOUTHWEST DISTRICT  
TAMPA**

Ms. Lynne Milanian  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: Class 1 Permit Modification  
Laidlaw Environmental Services of Bartow, Inc.  
EPA ID # FLD 980 729 610  
Permit # HO53-182726

Dear Ms. Milanian:

*drum stacking mod. NO rule or limit to stack - however need pallet racks to facilitate insp. of lids, bung securement, as well as fork lift*  
The enclosed is submitted as a Modification to the Hazardous Waste Permit for Laidlaw Environmental Services of Bartow, Inc. (LESB). The permit # is HO53-182726. The following items are requested to be modified: *Personal Plat Form. would this cause the need for increased 2ndry Containment?*

A. The Hazardous Waste Compliance Section has requested LESB to modify the waste analysis plan to include specific sampling procedures. Enclosed as Attachment A is the modified Waste Analysis Plan.

B. The contingency plan also is being modified. These modifications include:

1. Figure 9.1 has been revised to show the date of this modification.

2. Page 9-14 has been revised to reflect the name change to the FDEP from the Department of Environmental Regulation to the Department of Environmental Protection.

3. Figures 9.5 and 9.6 have been revised to indicate address and phone number changes of the first alternate Emergency Coordinator.

These revised Contingency Plan Pages have been enclosed as Attachment B. Also, as required, the updated Contingency Plan will be submitted to the appropriate emergency response agencies once this modification is approved.

C. Also Chapter 14 has been revised to reflect a more accurate, higher, closure cost estimate. Enclosed as Attachment C is the revised Chapter 14, Closure Cost Estimate.

This is being submitted as a class 1 permit modification. The applicable permit fee of \$250.00 is also enclosed.

I would also like to confirm our discussion with you in a meeting on 9/8/93 at the DEP office concerning the can crushers at LESB. These units simply crush cans of paint or other similar type waste typically collected at "Amnesty Days", i.e. household hazardous waste. As discussed, these units are not treating the waste but only forces the material out of its present container (cans), as the container is being crushed, into a larger container. Therefore, since the unit does not treat, store or dispose of hazardous waste, it is not a regulated unit. With the information from these discussions, LESB will use the can crushers to crush cans of <sup>household</sup> hazardous waste. If you disagree please provide your disagreement in writing to LESB within 15 days of your receipt of this modification.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,

*Mark H. Behel*

Mark H. Behel  
Safety and Compliance Manager

Enclosures:

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore

*Does the narrative in your application indicate the MANNER in which the released waste will be managed and the crushing unit handled to prevent a release?*

*Send us a description on this ↑*

*Called Mark 11/4/93 I said:*

- 1. Send me 2 more copies of this package.*
- 2. Send narrative on can crusher and*
- 3. Policy on drum stacking explained.*

*UHM 11/4*

**ATTACHMENT A**

*(Placed in current Operating Permit located on shelf )*

*- Chapter 4*

**ATTACHMENT B**

( Placed in current Operating Permit located on shelf )  
- Chapter 9

ATTACHMENT C

(Placed in current Operating Permit located on shelf )  
- Chapter 14



# JACOBS ENGINEERING GROUP INC.

POST OFFICE BOX 2008 LAKELAND, FL 33806-2008 HIGHWAY 98S AT STATE ROAD 540 LAKELAND, FL 33803-9763  
TELEPHONE (813) 665-1511 TELEX 52-2466 JACOBSENG LKL TELECOPIER (813) 665-5323

October 26, 1993

D.E.P

OCT 28 1993

SOUTHERN DISTRICT  
TAMPA

Mr. Mark Behel  
Laidlaw Environmental Services of Bartow, Inc.  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

**Subject: Response to FDEP Letter of October 11, 1993,  
regarding tank thickness calculations**

Dear Mark:

We have reviewed the two comments in the subject letter and offer the following response:

1. *Provide references along with copies of the formulas utilized in calculation of required wall thickness. Backup information depicting all calculations and formulas employed is attached. As cited therein, the primary reference for the calculations is Section VIII, Division 1, of the ASME Boiler and Pressure Vessel Code.*
2. *Documentation provided did not appear to address either in the narrative or calculation factors such as abrasion due to filling and emptying of tanks or agitation effects in tanks T111, T112, and T114. In accordance with reference methods, such factors as abrasion are considered as part of the corrosion allowance which is employed in the calculation for each tank.*

We hope that these responses are satisfactory; please call if you have any questions.

Yours truly,

JACOBS ENGINEERING GROUP INC.

James C. Andrews, Jr., PE  
Project Manager

Florida Registration No. 34175

JCA/ca



Certified Mail # P 644 593 474

October 27, 1993

Mr. Gary Santti, P.E.  
Hazardous Waste Manager  
Division of Waste Management  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

DEP

OCT 28 1993

SOUTHWEST DISTRICT  
TAMPA

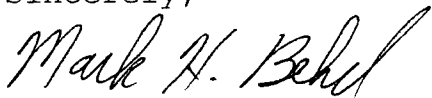
RE: Tank Thickness Testing Report  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID # FLD 980 729 610  
Permit # HO53-182726 4-1

Dear Mr. Santti:

This letter is in response to your request for additional information concerning the tank thickness calculations dated October 11, 1993. The requested information is attached. Also, as requested, the response is certified by a professional engineer.

If you have questions or need additional information feel free to call me at 813-533-6111.

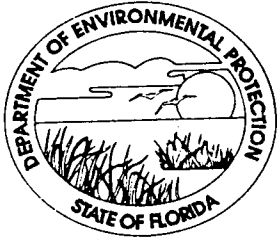
Sincerely,



Mark H. Behel  
Safety and Compliance Manager

Enclosure

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore



# Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

OCT 11 1993

Mr. Mark Behel  
Safety & Compliance Manager  
Laidlaw Environmental Services, Inc.  
170 Bartow Municipal Airport  
Bartow, Florida 33830

Dear Mr. Behel:

The Department acknowledges receipt of your September 9, 1993 letter which transmitted information for tank thickness test results for the 15 hazardous waste tanks at Laidlaw Environmental Services of Bartow. We have the following comments on your submittal:

1. Provide references along with copies of the formulas utilized in calculation of required wall thickness.
2. Documentation provided did not appear to address either in the narrative or calculations factors such as abrasion due to filling and emptying of tanks or agitation effects in tanks T111, T112 and T114.

Please provide an engineers certification to address these concerns within 45 days.

Sincerely,

Gary Santti, P.E.  
Hazardous Waste Manager  
Division of Waste Management

RE/ab

cc: Gil Dembeck, FDEP Tampa

- Sent by Fax on August 27, 1993
- Certified mail receipt # P 809 530 380

August 26, 1993

Mr. Roger Evans  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

**RECEIVED**  
AUG 30 1993

Department of Environmental Protection  
SOUTHWEST DISTRICT

BY \_\_\_\_\_

RE: Comments on Draft Permit Modification  
Laidlaw Environmental Services Of Bartow, Inc.  
EPA ID # FLD 980 729 610  
Permit # HO53-182726 4-1

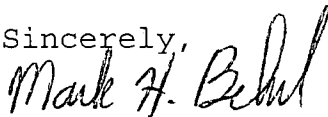
Dear Mr. Evans:

As you requested in our telephone conversation on August 26, 1993, enclosed are comments which address LESB's concerns of the Draft Permit Modification received on 8/13/93.

This original is being sent by fax at your request and a hard copy will be sent as a follow-up.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel  
Safety and Compliance Manager

Enclosure

pc: Mike Merashoff  
Ashley Chadwick  
E. Lin Longshore

## COMMENTS ON DRAFT RCRA PERMIT MODIFICATION

1. Page 1 of 18, third paragraph -- The reference to 8 rows of container storage on the north side of the building is incorrect. Only the 1 row next to the fuels blending area is permitted for storage, the remaining 8 rows are in the staging area.
2. Page 2 of 18, first line -- The statement "Tanks T-101 and T-110" should read "Tanks T-101 through T-110".
3. Page 12 of 18, # 2 -- The reference to 8 rows of container storage on the north side of the building is incorrect. Only the 1 row next to the fuels blending area is permitted for storage, the remaining 8 rows are in the container staging area.
4. Page 15 of 18, # 5 -- The headings for the table in this permit condition are as follows:

<u>Tank Number</u>	<u>Wall</u>	<u>Minimum Thickness</u> <u>Head</u>	<u>Cone</u>
--------------------	-------------	---	-------------

The headings for this table should read as follows:

<u>Tank Number</u>	<u>Wall</u>	<u>Minimum Thickness</u> <u>Head</u>	<u>Cone/Head</u>
--------------------	-------------	---	------------------

The reason for the change is; tanks T-111, T-112, T-114, R-202 & R-203 are not cone bottom tanks. These tanks have heads on the bottoms instead of cone bottoms.

5. Page 16 of 18, # 13.b. -- This permit condition, as stated, requires any time there is a spill from a tank, the tank must be emptied. If there is a spill incident and the integrity of the tank is not affected by the spill such as an accidental overflow, there is no need to remove the remaining waste from the tank. This requirement is excessive and beyond the requirements stated in 40 CFR 264.196. Please re-state the requirement so it states waste will be removed from a tank only when the integrity is adversely affected by a spill.

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

Date: 24-Aug-1993 04:29pm EST  
From: Diana Davis TAL  
DAVIS\_D@A1@DER  
Dept: Office General Counsel  
Tel No: 904/488-9730  
SUNCOM:

TO: Merlin Russell TAL ( RUSSELL\_M@A1@DER )  
TO: Michael Hatcher TAL ( HATCHER\_M@A1@DER )  
CC: Lynne Milanian TPA ( MILANIAN\_L @ A1 @ TPA1 )  
CC: Roger Evans TPA ( EVANS\_R @ A1 @ TPA1 )

Subject: LAIDLAW ENVIRONMENTAL SERVICES

I spoke with Mark Behel (813) 533 6111 today about the facility's permit modification. I told him that a modification to add new waste streams would be either \$1,000 or \$5,000 depending on the amount of work required by the Department.

He said that the facility is not going to modify its permit now and that he was interested in the modification fee for the purpose of making business decisions on whether or not to add new waste streams to those already being managed at the facility. My question was answered. Thank you.

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

Date: 23-Aug-1993 04:34pm EST  
From: Diana Davis TAL  
DAVIS\_D@A1@DER  
Dept: Office General Counsel  
Tel No: 904/488-9730  
SUNCOM:

TO: Merlin Russell TAL ( RUSSELL\_M@A1@DER )  
CC: Lynne Milanian TPA ( MILANIAN\_L @ A1 @ TPA1 )  
CC: Roger Evans TPA ( EVANS\_R @ A1 @ TPA1 )

Subject: LAIDLAW ENVIRONMENTAL SERVICES

I received a phone call from Mark Beal (813) 533-6111, questioning which permit modification fee would be appropriate for this facility. He stated that the Department is requiring the facility to modify its permit to add newly regulated waste streams.

Pursuant to 40 CFR 270.42(g), a permittee is authorized to continue to manage newly regulated waste, if the permittee fulfills a number of requirements, including, submitting a class 2 or 3 modification request within 180 days of the effective date of the rule listing or identifying the waste, or subjecting the unit to RCRA Subtitle C management standards. 40 CFR 270.42(g)(iv). Therefore, the addition of waste streams is a major modification.

Rule 17-4.050(4)(i)17, F.A.C. bases permit modification fees on the amount of work that will be required to make the requested modification. The addition of waste streams requires review of the facility's contingency plan. This modification appears to fall within the \$5,000 category, since it involves site specific evaluations. However, rule 17-4.050(4)(i)17 d, F.A.C., states in the examples that modifications to conform to new requirements are \$1,000.

Please let me know the appropriate fee based on the work-load, so that I can respond to Mark Beal.



# Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

AUG 12 1993

Mr. Mark H. Behel  
Safety & Compliance Manager  
Laidlaw Environmental Services, Inc.  
170 Bartow Municipal Airport  
Bartow, FL 33830

Re: Laidlaw Environmental Services of Bartow  
EPA ID #FLD 908 729 610  
Permit #HO53-182726A

Dear Mr. Behel:

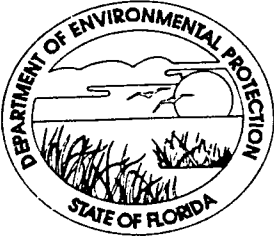
Enclosed within, please find a copy of the revised draft permit regarding the above referenced facility. Please review and provide comments within ten (10) working days of receipt of this letter.

If you have any questions regarding the enclosed draft permit, please contact Lynne Milanian or myself at (813) 744-6100, extensions 372 or 388.

Sincerely,

Roger Evans  
Permitting Engineer  
Hazardous Waste Section  
Division of Waste Management

RE/ab  
Enclosure



# Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

July 9, 1993

Mr. Mark H. Behel  
Safety & Compliance Manager  
Laidlaw Environmental Services, Inc.  
170 Bartow Municipal Airport  
Bartow, FL 33830

Re: Laidlaw Environmental Services of Bartow  
EPA ID #FLD 908 729 610  
Permit #HO53-182726A

Dear Mr. Behel:

Enclosed within, please find a copy of the draft permit regarding the above referenced facility. Please review and provide comments within fifteen (15) working days of receipt of this letter. Also, as discussed in our conversation of July 1, 1993, please provide the appropriate certification for measurements of the minimum wall thickness for the cone bottom portion of the tanks noted in Specific Condition Part III No. 5.

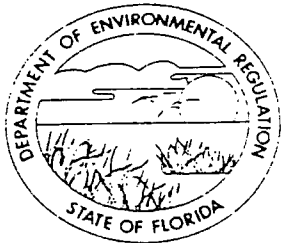
If you have any questions regarding the enclosed draft permit, please contact Lynne Milanian or myself at (813) 744-6100, extensions 372 or 388.

Sincerely,

Roger Evans  
Permitting Engineer  
Hazardous Waste Section  
Division of Waste Management

RE/ab  
Enclosure





# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

Richard Garrity, Deputy Assistant Secretary

DATE: July 23, 1993

TIME: 11:25 am

SUBJECT: Laidlaw Environmental - Bartow 4-i 182726

## A T T E N D E E S

Name

Affiliation

Telephone

Roger Evans

FDEP

(813) 744-6100

Mark Behl

Laidlaw

813-533-6100

Mr. [unclear]

Laidlaw

813/533-6111

Elbert [unclear]

FDEP

(813) 744-6108 ext 399

L. Mikarjian

FDEP

" 372

mtg detailed discuss  
recently requested  
conditional - decided  
date and considered

and on the minor per  
and our draft of  
to issue permit w/in  
Laidlaw's concerns.

mit modifications  
revised permit  
10 days of this mtg

**RECEIVED**  
**JUN 11 1993**

UPS Next Day Air # 0436 8692 137

Department of Environmental Regulation  
SOUTH WEST DISTRICT

BY \_\_\_\_\_

June 10, 1993

Mr. Roger Evans  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Regulations  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: Tank Drawing for Class 1 Permit Modification  
Laidlaw Environmental Services Of Bartow, Inc.  
EPA ID # FLD 908 729 610  
Permit # HO53-182726

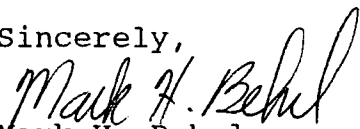
Dear Mr. Evans:

Placed in Attachment 4-C

As you requested in our telephone conversation on June 10, 1993,  
enclosed is the revised drawing for tanks T-101 to T-110.

If you have questions or need additional information feel free to  
call me at 813-533-6111.

Sincerely,

  
Mark H. Behel  
Safety and Compliance Manager

Enclosure

pc: Mike Merashoff  
Paul Manak  
Ashley Chadwick  
E. Lin Longshore  
Barbara Hamilton

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

# Interoffice Memorandum

---

TO: Roger C. Evans  
District Permitting Engineer

FROM: Lynne R. Milanian  
Supervisor RCRA Permitting

DATE: May 5, 1993

RE: *Laidlaw Environmental Services, FLD 908 729 610*  
*Minor Modification of Operating Permit*  
*Application Number HO53-182726*

---

Please examine the attached modification for completeness. *Section A* has to do with equipment upgrades, place all modified attachments in the original application after you have checked what the modification is and determined that it is appropriate. *Section B* has to do with the contingency plan, also check each of these revisions to determine if correct and if so place in the original application. *Section C* concerns the freon wash tank check the revised figure, if correct place in original application. *Section D and E* concerns specific conditions of the issued permit if you determine these revisions to permit language are correct you can modify the specific conditions.

It may be useful to confirm with Gilbert the meeting referenced on 3/26/93 and the statement made in this letter. Also I believe Gilbert would like to see other revisions to this permit. If Gilbert can present in writing or describe to you what revisions he is concerned with, you can incorporate them along with the rest of the modifications. Gilbert also has two outstanding unresolved warning letters with Laidlaw I believe.

If you have any questions or if you are unclear about the requested modifications write or call the facility for clarification, if writing tell them their requested modification will be held in abeyance until receipt of the requested info.

Please place all this "stuff" in the attached binder. Based on the number of modifications you make it will either be appropriate to revise the entire permit, or to send the one page permit modification letter which presents only the few changes made. In addition this package will require the permit signature cover memo and letter.

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

# Interoffice Memorandum

---

TO: Satish Kastury  
Administrator, Tallahassee

THRU: ✓ Gary Santti, Professional Engineer II, Tampa  
Hazardous Waste Regulation  
*GILBERT DEMBECK*

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *lynne 4/29*

DATE: April 29, 1993

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit File No. HO53-182726*  
*Permit Modification for Equipment Upgrades*

---

Attached are documents dated April 15, 1993 and submitted April 16, 1993 which are subject to the noted permit.

This package details:

1. One three page cover letter.

lrm

Attachment

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

lesbtran.doc

*WE HAVE SOME QUESTIONS ABOUT THE  
VIABILITY OF THIS. IS  
DO THEY NEED MONITORING EQUIPMENT? (AIR)*

Certified Mail # P 809 530 463

April 15, 1993

Mr. Allen Farmer, Chief  
RCRA Branch  
Waste Management Division  
USEPA, Region IV  
345 Courtland Street, NE  
Atlanta, GA 30365

D.E.R.

APR 19 1993

SOUTHWEST DISTRICT  
TAMPA

RE: Class 1 Permit Modification  
Laidlaw Environmental Services of Bartow, Inc.  
EPA ID # FLD 908 729 610

Dear Mr. Farmer:

Laidlaw Environmental Services of Bartow, Inc. (LESB) is submitting a Class 1 Modification (Mod) to our HSWA Permit (Permit # FLD 980 729 610). The Mod is being submitted in compliance with permit Condition I.D.16. Additionally, LESB would also like to modify Part V and Attachment 1 of the Permit.

Condition I.D.16 requires LESB to submit facts and information relevant to regulated activities to EPA upon becoming aware of such. LESB operates a Freon Wash Tank (FWT) at the facility. LESB has recently become aware that the emissions vent on the FWT is subject to 40 CFR 264 Subpart AA.

Additionally, LESB supplied data to EPA on June 19, 1992 concerning the emissions rates from the Thin Film Evaporator, Vacuum Still and Distillation Column. After further evaluation of this data it was determined to be questionable. The stack testing data was considered questionable because of the following reasons:

- There was no supervision of the testing by an engineer
- Flow was measure with a hot wire anemometer. The vent being sampled, however, is only 1" diameter (internal). EPA Method 2A should have been used.
- Samples were collected during start-up operating conditions.

The emissions rates provided to EPA on June 19, 1992 were:

<u>UNIT</u>	<u>EMISSIONS RATE (#/hr)</u>
Vacuum Still	0.198
Distillation Column	3.983
<u>Thin Film Evaporator</u>	<u>1.080</u>
TOTAL	5.261

D.E.R.

APR 19 1993

SOUTHWEST DISTRICT  
TAMPA

These units were re-tested in November, 1992 and the correct emissions rates for each unit was determined to be as follows:

<u>UNIT</u>	<u>EMISSIONS RATE (#/hr)</u>
Vacuum Still	0.0000
Distillation Column	0.2054
<u>Thin Film Evaporator</u>	<u>0.0407</u>
TOTAL	0.2461

The total hours of operation of these three units in 1992 were 6983. Assuming worst case conditions (i.e. constant emissions of 0.2461 #/hr for 6983 hours) the total emissions emitted for the year would be 0.86 tons per year (TPY).

The emissions vents for these three units currently have emissions control devices on them (condensers). The emissions rate of 0.2461 #/hr was determined with the condensers in place. These controls were placed on the units to comply with the air emissions limits in the facility's State Air Permit. Using the efficiency of each of these control devices the uncontrolled emissions can be determined. These calculated uncontrolled emissions are:

<u>UNIT</u>	<u>EMISSIONS RATE (#/hr)</u>
Vacuum Still	0.0000
Distillation Column	0.5350
<u>Thin Film Evaporator</u>	<u>0.1740</u>
TOTAL	0.7090

These totals, however, do not include the FWT. Using AP-42 calculations to determine the emissions from the FWT gives a value of 0.09 #/hr. In 1992 it was operated 92.5 hours. Therefore the total emissions from the FWT in 1992 was 7.7 lbs.

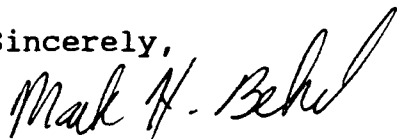
The data above demonstrates that if all four units were operating without emissions control devices, the total emissions from the four process vents would be 0.7990 #/hr and 2.48 TPY. Both the hourly and yearly totals are below the specified limits in 40 CFR 264.1032 of 3.0 #/hr and 3.1 TPY. Therefore, no emissions controls are necessary to comply with 40 CFR 264.1032.

The incorrect emissions data noted in the June 19, 1992 letter led to the inaccurate conclusion that emissions controls were needed on the Distillation Column (DC). As a result, LESB agreed to add an emissions control device to the DC. A refrigerated vent condenser was added to the DC emissions vent in June 1992. Since the actual measured emissions are within the regulatory emissions limits without emission controls there is no need to maintain the refrigerated vent condenser on the DC.

Part V and Attachment 1 of the permit also need revisions for the emissions vent on the FWT as a Subpart AA vent. Additionally the numbering system for the valves and pumps has changed to make the monthly monitoring easier to track on a computer spreadsheet. Enclosed is a copy of the spreadsheet which lists each pump and valve and its corresponding number and all other relevant identification information as required by Subpart BB of 40 CFR Part 264. This should replace the previous information included in Attachment 1 of the permit. The plot plan showing the addition of the FWT is included in Attachment A. Attachment B is a copy of the spreadsheet which show the pumps and valves which should replace the current Attachment 1 in the permit.

Please process this permit modification and should you have any questions or need any additional information, feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel  
Safety and Compliance Manager

Enclosures

cc: Ashley Chadwick  
Mike Merashoff  
E. Lin Longshore  
Paul Manak  
Barbara Hamilton  
Ms. Lynne Milanian - FDER



**ATTACHMENT A**

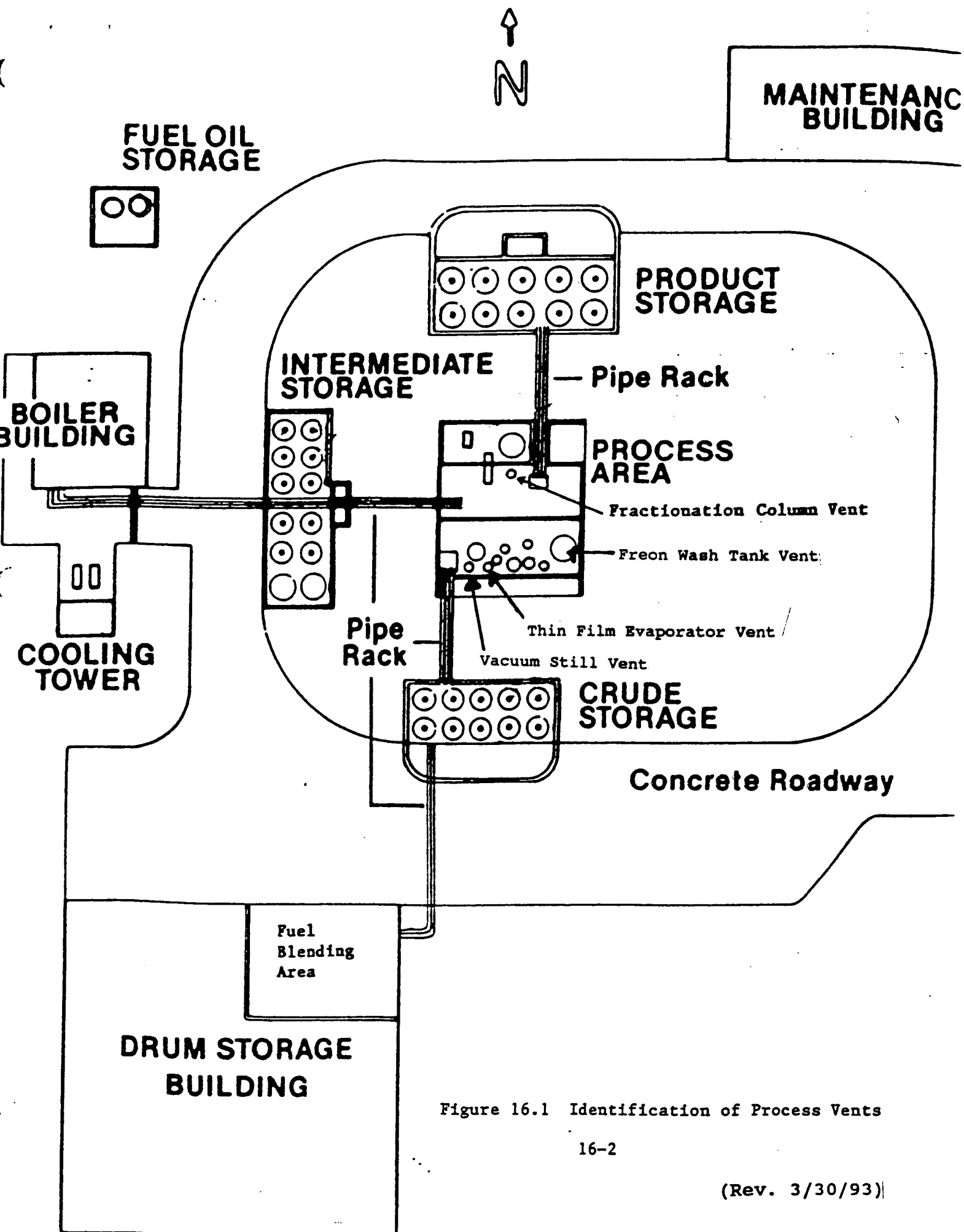


Figure 16.1 Identification of Process Vents

**ATTACHMENT B**

LAIDLAW ENVIRONMENTAL SERVICES -- BARTOW  
EQUIPMENT LIST  
Rev. 03/10/93

EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT	OLD ID NO.
8		BV	6	E	T-112 side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
10		CV	1	E	T-112 side out air	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
15		MF	3	E	T-112 Magnet clean out S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
20		MF	3	E	T-112 Magnet clean out N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
25		BV	6	E	T-112 Y Valve pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
30		BV	6	E	T-112 Dycon cut-off inlet	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
32	PUMP	DP	3	E	T-112 Dycon pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	E-036-P
35		BV	3/4	E	T-112 Dycon dischg drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
40		BV	3	E	T-112 Dycon dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	E-040-V
45		BV	3	E	T-112 Line out post pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
50		BV	3	E	T-112 DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
55		BV	3	E	T-112 Basket filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
60		BV	1/2	E	T-112 Bkt filter pres rell	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
61		BV	1/2	E	T-112 Basket filter pres rell	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
65		BV	3	E	T-112 DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
70	PUMP	DP	1 1/2	E	T-112 Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	
75		BV	1 1/2	E	T-112 DP discharge cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
80		BV	3/4	E	T-112 DP dis side air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
85		CV	1	E	T-112 DP dis side air CV	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
90		BV	2	E	T-112 DP dis line VO pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
95		BV	3	E	T-112 Bot tank drain Val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
105		BV	3	E	T-111 Side dischg pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
110		BV	1	E	T-111 Side dischg air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
115		BV	3	E	T-111 Filter inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
120		BV	3	E	T-111 Filter outlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
125		BV	3	E	T-111 Filter B/P line cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
130		BV	3	E	T-111 outlet line (open)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
135	PUMP	GP	3	E	T-111 Gear Pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	E-017-P
140		BV	3	E	T-111 Gear pump dis cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
145		BV	3	E	T-111 Dis cutoff non ex pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
150		BV	3	E	T-111 Bottom tank drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
155		BV	3	E	MM Tank dm line to load S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
160		BV	3/4	E	MM Air line tank dm S	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
165		BV	1	E	MM Air line dm upper N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
170		BV	3	E	MM Air line dm lower N	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
175		BV	3	E	MM Tank dm line drums	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
180		BV	2	E	MM Bot tank port pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
185		CV	1	E	MM Bot tank air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
190		BV	6	E	MM side out pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
195		MF	3	E	MM Magnet cleanout E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
200		MF	3	E	MM Magnet cleanout W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
205		BV	6	E	MM Gerator inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT	OLD ID NO.
210	PUMP	BV	2	E	MM Side out pmp dm & port pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	E-085-P
215		BV	1	E	MM Gorator inlet air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
220		GP	6	E	MM Gorator grinder pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
225		BV	4	E	MM Gorator dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
230		BV	1	E	MM Gorator dischg air line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
235		BV	4	E	MM Cut fr Gor to Muff M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
240		BV	4	E	MM Cut fr Gor to T-112 & 4	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
245		BV	2	E	T-114 Blend line to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
247		BV	2	E	Top of T-114 Blend Line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
250		BV	2	E	MM Blend line to Muff M	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
255		BV	4	E	MM Cut fr Gor to T-114	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
260		BV	4	E	MM Cut fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
265		BV	3	E	T-114 Side outlet to pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
270		BV	1	E	T-114 Side out to pmp airline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
280		BV	1	E	T-114 Filter inlet drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
285		BF	1 1/2	E	T-114 Basket Filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
290		BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
291		BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
293	PUMP	BV	2	E	T-114 Filter pressure relief	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	E-086-P
295		BV	1/2	E	T-114 Filter outlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
296		DP	2	E	T-114 Diaphragm pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
305		BV	3	E	T-114 DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
310		CV	1	E	T-114 DP dischg cutoff airline	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
315		BF	2	E	DRM PMP DP dm pmp filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
320		BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
321		BV	1/2	E	DRM PMP Filter Pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
325		BV	2	E	DRM PMP DP inlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
330		DP	1 1/2	E	DRM PMP Pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
335		BV	2	E	DRM PMP DP dischg cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
340		BV	1	E	DRM PMP DP dischg line dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
345		BV	1	E	DRM PMP DP dis air line H/U W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
350		GV	1	E	DRM PMP DP dis air line H/U E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
355		BV	3	E	DRM PMP Dischg (high)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
360		BV	3	E	DRM PMP Dischg drain (high)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
365		BV	2	E	DRM PMP Dis 2" C/O to Trs(UNE)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
367	PUMP	BV	2	E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	E-086-P
370		BV	3	E	DRM PMP Dis 3" C/O to Trs(UNE)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
372				E	HOSE con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
375		BV	2	E	UPPER NE drum pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
380		BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
382		BV	3	E	W HOSE con trk loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
385		BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
387		BV	3	E	E HOSE con trk loading frm fuel blend	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
390		BV	3	E	UPPER NE fr T-114 to Trk Load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
395		BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
397		BV	1	E	T-114 Basket File Filter Drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
400		BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
405		BV	3	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
410		BV	4	E	UPPER NE truck loading	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
415		BV	4	E	UPPER NE fr Gor to T-112	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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420		BV	3	E	UPPER SET T-111 to T-112	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
425		BV	2	E	UPPER SET T-112 blend line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
430		BV	2	E	UPPER SET MM/T-114 blend line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
435		BV	2	E	UPPER SET T-111 blend line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
440		CV	3	E	UPPER SET T-111 dischg line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
445		BV	2	E	UPPER SET T-111 dischg line out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1005		BV	1 1/2	D	BOTTOM outlet port/pmp con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1010		BV	4	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1015		BV	1	D	BOTTOM outlet to pmp cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1020		BF	4	D	BOTTOM outlet basket fill	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1025	PUMP	CP	/	D	BOTTOMS/recirculation pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	C-063-P
1030		BV	2	D	RECIR line cutoff(bot)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1035		BV	1	D	RECIR line drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1040		BV	2	D	RECIR line cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1045		CV	3	D	BOTTOMS line pmp dis	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1050		BV	1	D	BOTTOMS line pmp bleed/air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1055		BV	1/2	D	BOTTOMS pump gauge cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1060		BV	1/2	D	BOTTOMS pmp gauge drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1065		BV	3	D	BOTTOMS pmp dis to cool cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1070		BV	1	D	BOTTOMS inlet to H-305 air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1075		GV	3/4	D	H-305 cool prod dm line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1080		BV	3	D	H-305 cool outlet cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1085		BV	2	D	H-305 dis line-in trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1090		BV	1 1/2	D	SIDE out to sight glass	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1095		BV	1 1/2	D	SIGHT glass drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1100		GV	3/4	D	SIGHT glass tube valve bottom 1st	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1105		GV	3/4	D	SIGHT glass tube valve 2nd up	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1110		GV	3/4	D	SIGHT glass tube valve 3rd up	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1115		GV	3/4	D	SIGHT glass tube valve 4th up	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1120		GV	3/4	D	SIGHT glass tube valve 5th up	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1125		GV	3/4	D	SIGHT glass tube valve 6th up	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1130		BV	1 1/2	D	TOP sight glass cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1135		BV	1	D	TOP pressure gauge cutoff	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1140		BV	3/4	D	BOTTOM col return - S-302	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1145		BV	1	D	BOTTOM col return S-302 dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1150		BV	1	D	BOTTOM col return S-302 dm in at S-302	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1155		BV	1	D	S-302 side out sample line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1160		PSV	6	D	S-302 vapor PSV (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1165		PSV	3	D	COL prod vapor (vents-R-303)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1170		BV	1/2	D	COL out to pres switch W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1175		BV	1/2	D	COL out to pres switch E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1180		CV	1	D	VAC relief val top F-302	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1185		BV	1/2	D	SIDE out top col ladder	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1190		BV	1/2	D	SIDE out near top col	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1195		BV	1/2	D	SIDE out 1/3 down top col	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1200		BV	1	D	BOTTOM tank dm line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	D-055-V
1205		BV	2	D	TO reflux pmp out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1210		BV	1	D	REFLUX pmp in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1215	PUMP	DP	/	D	REFLUX pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-048-P

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1220		BV	1	D	REFLUX pmp dis to gauge & smpl in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1225		BV	1 1/2	D	REFLUX PUMP TO PORTPMP/OR CON	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1230		BV	1/2	D	REFLUX PMP DIS SAMPLE LINE	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1235		BV	1 1/2	D	REFLUX pmp dis out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1240		CV	1 1/2	D	REFLUX pmp dis in to prod	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1245		BV	1	D	FLOW meter(prod) in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1250		BV	1	D	FLOW meter(prod) in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1255		BV	1	D	FLOW meter(prod) B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1260		BV	1	D	FLOW meter(prod) out dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1265		BV	1	D	FLOW meter(prod) out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1275		BV	1	D	COL prod out to air contri val in out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1280				D	COL prod out to air contri valve in out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1285		BV	1	D	COL PRODUNE AIRCON V&P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1286		BV	1	D	COL PRODUNE BP GAUGE LINE	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1290		BV	3/4	D	PROD in air val dis dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1291		BV	3/4	D	PROD in air val dis dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1295		BV	1	D	PROD in air contri val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1300		BV	1	D	PROD in air contri val dis cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1305		AV	1 1/2	D	PROD in to trans stat cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1310		BV	2	D	PROD in hose con in trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1315		BV	1 1/2	D	PROD in return to S-302 (low)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1320		BV	1 1/2	D	PROD in return to S-302 (up)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1325		BV	2	D	FILL in cut at tank (up)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1330		BV	2	D	FILL in con in trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1335		BV	1 1/2	D	REFLUX pmp dis in to cool top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1340		BV	1 1/2	D	REFLUX pmp dis in to CKV B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1345		CV	1	D	REFLUX pmp dis in to dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1350		BV	1 1/2	D	REFLUX pmp dis in to contri val in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1355		BV	1 1/2	D	REFLUX pmp dis in to contri val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1360		BV	1 1/2	D	REFLUX pmp dis in to contri val out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1365		BV	1 1/2	D	REFLUX pmp dis in to contri val B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1370		BV	1	D	REFLUX flow meter in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1375		BV	1	D	REFLUX flowmeter in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1380		BV	1	D	REFLUX flowmeter B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1385		BV	1	D	REFLUX flowmeter out dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1390		BV	1	D	REFLUX flowmeter out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1395		BV	1/2	D	REFLUX in to top col/gauge in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1400		GV	1	D	BOTTOM sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1405		GV	1	D	TOP sightglass val R-302	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1410		GV	1	D	Chiller return line drain	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1415		GV	1	D	R-302 vent line to chiller	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1420		GV	1	D	R-302 chiller outlet to vent	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1600		BV	3	D	BOTTOM tank out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1605		BV	3	D	BOTTOM tank recirc water cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1610		BV	3	D	SIDE out to pmp top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1615		BV	3	D	SIDE out to pmp middle	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1620		BV	1	D	PUMP in basket filter dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1625		GV	1	D	PUMP in dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1630	PUMP	CP	/	D	CINTRIFICAL pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-098-V D-100-P

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EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT	OLD ID NO.
1635		CV	3	D	PUMP dis line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1640		BV	1/2	D	PUMP dis gauge/sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1645		BV	1/2	D	PUMP dis sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1650		BV	1	D	PUMP dis air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1655		BV	3	D	PUMP dis to in recirc in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1660		BV	3	D	PUMP dis to trans cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1665		BV	2	D	PUMP dis con trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1670		BV	2	D	INLET feed in to tank top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1675		BV	1	D	SIDE out sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1676		BV	1	D	SIDE out sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1680		GV	3/4	D	SIGHT glass val (bottom)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1685		GV	3/4	D	SIGHT glass val (top)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1690		GV	3	D	BOTTOM tank in/out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1695		BV	1	D	BOTTOM tank in/out out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1696		BV	1	D	BOTTOM tank in/out out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1700		GV	3	D	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1705		BV	1	D	BOTTOMS pmp in filter dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1710		GV	1	D	BOTTOMS pmp in in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1715	PUMP	CP	/	D	BOTTOMS pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-210-P
1720		CV	3	D	BOTTOMS pmp dis check val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1725		GV	1/2	D	BOTTOMS pmp dis in to gauge/sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1730		GV	1/2	D	BOTTOMS pmp dis in to sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1735		GV	3/4	D	BOTTOMS pmp dis in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1740		BV	1	D	BOTTOMS pmp dis air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	D-215-V
1745		BV	3	D	BOTTOMS pmp return tank	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1746		CV	3	D	CHECK valve	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1750		GV	3	D	BOTTOMS pmp cut trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1755		BV	2	D	BOTTOMS pmp dis con trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1760		BV	2	D	FILL in con in trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1765		BV	1	D	SAMPLE val on manway cover	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1766		BV	1	D	SAMPLE val on manway cover	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1770		GV	3/4	D	SIGHT glass val bottom	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1775		GV	3/4	D	SIGHT glass val top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1776		PSV	3	D	PRESS val top vac	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1777		GV	3/4	D	GAUGE in cut top vac	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1778		GV	2	D	PROD return in from condenser to top vac	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1780		BV	3/4	D	SAMPLE/air con bot H-101 (top)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1785		BV	3/4	D	SAMPLE/air con bot H-101 (bottom)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1790		GV	2	D	TOP in in to R-101	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1795		PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1796		PSV	1	D	TOP R-101	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1800		GV	2	D	VACUUM in from R-101	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1805		GV	1	D	DRAIN in from R-103 K/O pot	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1810		BV	1 1/2	D	R-101 bottom tank to pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1815		CV	1 1/2	D	R-101 bottom tank to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1820		CAP	2	D	R-101 bottom tank to pmp in dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1825	PUMP	CP	/	D	R-101 pump	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-180-P
1830		CV	2	D	R-101 pmp dis in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1835		GV	1/2	D	R-101 pmp dis in (samp/gauge) in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	



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1840		BV	1/2	D	R-101 pmp dis in sample in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1845		GV	1	D	R-101 pmp dis in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1850		GV	1 1/2	D	R-101 pmp dis in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1855		BV	2	D	R-101 pmp dis in trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1860		GV	3/4	D	R-101 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1865		GV	3/4	D	R-101 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1870		GV	1 1/2	D	R-102 tank in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1875		GV	1	D	R-102 tank vent out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1880		CV	1	D	R-102 top tank	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1885		GV	2	D	R-102 vac in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1890		GV	3/4	D	R-102 tank sightglass top	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1895		GV	3/4	D	R-102 tank sightglass bottom	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1900		GV	1	D	R-102 bottom tank dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1905		GV	2	D	R-102 Prod pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1910		BV	1/2	D	R-102 Prod pmp in filter dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1915		GV	1	D	R-102 Prod pmp in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1920	PUMP	CP		D	R-102 Prod pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-172-P
1925		CV	1 1/2	D	R-102 Prod pmp dis ck val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1930		BV		D	R-102 Prod pmp dis gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1935		BV		D	R-102 Prod pmp dis sample in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1940		BV		D	R-102 Prod pmp dis drum hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1945		GV	1 1/2	D	R-102 Prod pmp dis cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1950		GV	1 1/2	D	R-102 Prod pmp dis air convolve in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1955		AV	3/4	D	R-102 Prod pmp dis air con val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1960		GV	1 1/2	D	R-102 Prod pmp dis air contri val out out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1965		GV	1	D	R-102 Prod pmp dis air contri val B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1970		BV	2	D	R-102 Prod pmp dis Trans con W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1975		BV	2	D	TRANS feed in con W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1980		GV	2	D	FEED in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1985		BV	2	D	TRANS feed/overheads out con W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1990		CV	2	D	OVERHEADS(R-201) TFE feed in chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
1995		GV	2	D	OVERHEADS(R-201) TFE feed in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2000		BV	2	D	FEED in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2005		GV	2	D	FEED pmp B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2010		GV	2	D	FEED pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2015	PUMP	RP	2	D	FEED pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-218-P
2020		GV	2	D	FEED pmp out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2022		GV	3	D	H-202 bottom receiver cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2025		GV	2	D	H-202 prod pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2030		BV	1	D	H-202 prod pmp in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2035		CV	2	D	H-202 prod pmp in chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2040	PUMP	CP	2 X 1	D	H-202 prod pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-137-P
2045		BV	1/2	D	H-202 prod pmp sample in 1st val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2050		BV	1/2	D	H-202 prod pmp sample in 2nd val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2055		CV	1 1/2	D	H-202 prod pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2060		BV	1	D	H-202 prod pmp dis airin con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	D-142-V
2065		GV	1/4	D	H-202 prod pmp dis flowmtr con 1st	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2070		GV	1/4	D	H-202 prod pmp dis flowmtr con 2nd	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2075		BV	1/2	D	H-202 prod pmp TFE sightgl wash	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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2080		BV	1/2	D	TFE sightglass wash in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2082		PSV	3	D	PRES val top TFE	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2085		BV	1 1/2	D	H-202 pmp air contrl val in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2090		AV	1	D	H-202 pmp air contrl val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2095		BV	1 1/2	D	H-202 pmp air contrl val out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2100		BV	1	D	H-202 pmp air contrl val B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2105		BV	2	D	H-202 prod pmp trans con W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2110		BV	1 1/2	D	H-202 prod pmp R-210 overhd recv	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2115		BV	1	D	R-201 vent cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2120		GV	3/4	D	R-201 sightglass bot val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2125		GV	3/4	D	R-201 sightglass top val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2130		GV	1 1/2	D	R-201 bot out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2135	PUMP	DP	1 1/2	D	R-201 prod pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-124-P
2140		BV	2	D	R-201 prod pmp dis cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2145		GV	3/4	D	H-202 sightglass bottom val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2150		GV	3/4	D	H-202 sightglass top val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2155		BV	1	D	VAC in cut R-202	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2160		BV	1/2	D	H-202 vac in gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2162		BV	1/2	D	H-202 vac in gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2165		GV	1	D	R-104 K/O pot bot tank dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2170		BV	2	D	R-104 out vac pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2180		BV	3	D	BOTTOMS in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2185		BV	1	D	BOTTOMS in steam in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2190		BV	1	D	BOTTOMS in steam in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2195		BV	3	D	BOTTOMS in, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2198		BV	3	D	BOTTOMS in, bots pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2200	PUMP	RP	/	D	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	D-107-P
2202	PUMP	DP		D	TFE BOTTOMS PUMP	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	
2205		CV	3	D	BOTTOMS pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2210		BV	2	D	BOTTOMS pmp dis hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2215		BV	2	D	BOTTOMS pmp dis R-201 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2220		GV	3	D	BOTTOMS pmp dis trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2225		BV	2	D	BOTTOMS pmp dis trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2230		GV	3	D	BOTTOMS pmp dis R-2/R-3 cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2235		GV	1	D	BOTTOMS pmp dis steam in con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2240		CV	1	D	BOTTOMS pmp dis steam in con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2245		BV	3	D	BOTTOMS in trans W/fm trans W to R-2/R-3	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2250		BV	2	D	BOTTOMS in trans W/fm trans W to R-2/R-3 trans hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2255		BV	3	D	R-2 in in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2260		BV	3	D	R-3 in in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2265		BV	1/2	D	R-2 in in gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2275		BV	3	D	SIGHT glass opening	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2280		RD	3	D	Pres relief disc	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2285		AG	3	D	R-2 shaft seal	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2290		BV	1	D	VACUUM vent in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2295		BV	1/2	D	VENT in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2300		BV	1/2	B	GAUGE in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2305		BV	1/2	B	AIR in in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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2310		BV	3	B	SIGHT glass cover val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2318		GV	1	B	VACUUM/Vent in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2325		GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	B-080-V
2330		GV	6	B	BOTTOM out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	B-048-V
2335		BV	1	B	BOTTOMS pmp in dm in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2340		BV	3	B	BOTTOMS pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2345		BV	3	B	BOTTOMS pmp B/P	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2350	PUMP	DP	3	B	BOTTOMS pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	
2355		BV	3	B	BOTTOMS pmp out cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2360		BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2361		BV	1	B	BOTTOMS pmp out air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2365		BV	3	B	BOTTOMS pmp out hose con 3"	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2370		BV	3	B	BOTTOMS pmp out trans cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2375		BV	2	B	BOTTOMS pmp trans con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2380		BV	2		W trans in to E trans (S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2385		BV	2		E trans from W trans (L)(N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2390		BV	2		E trans to W trans (U)(S)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
2395		BV	2		W trans in from E trans (N)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	D-274-V
2500		BV	2	D	TFE vacuum system from R-204 top	Vapor	> 10 %	Vacuum	N/A	N/A	
2505		AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A	
2510		BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A	
2515		BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A	
2520		BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2525		GV	2	D	PUMP inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2530		GV	1/2	D	PUMP inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2535	PUMP	VP	2	D	VACUUM pump	Vapor	> 10 %	Vacuum	N/A	N/A	
2540		BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A	
2545		BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2550		BV	2	D	VACUUM still vac sys from R-103 top	Vapor	> 10 %	Vacuum	N/A	N/A	
2555		AV	2	D	AUTO control valve	Vapor	> 10 %	Vacuum	N/A	N/A	
2560		BV	2	D	AUTO valve bypass	Vapor	> 10 %	Vacuum	N/A	N/A	
2565		BV	2	D	(useless valve)	Vapor	> 10 %	Vacuum	N/A	N/A	
2570		BV	2	D	VENT cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2575		GV	2	D	PUMP inlet cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2580		GV	1	D	PUMP inlet gauge cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2585	PUMP	VP	2	D	VACUUM pump	Vapor	> 10 %	Vacuum	N/A	N/A	
2590		BV	1	D	VACUUM pmp discharge drain	Vapor	> 10 %	Vacuum	N/A	N/A	
2595		BV	2	D	VACUUM pmp water return cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
2600		BV	2	D	TFE vacuum still; vacuum pmp line cut off	Vapor	> 10 %	Vacuum	N/A	N/A	
3000		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3005		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3006		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3010		BV	3	A	BOTTOM tank dm cut (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3020		BV	3	A	BOTTOM tank dm in cut (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3015		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3025		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3030		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3031		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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3035		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3040		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3045		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3050		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3055		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3056		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3060		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3065		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3070		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3075		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3080		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3081		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3085		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3090		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3095		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3100		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3105		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3106		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3110		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3115		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	A-003-V
3120		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	A-002-V
3125		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3130		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3131		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3135		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3140		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3145		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3150		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3155		BV	1/2	A	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3156		BV	1/2	A	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3160		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	A-016-V
3165		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3170		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3175		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3180		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3181		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3185		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3190		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3195		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3200		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3205		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3206		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3210		BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3215		BV	1	A	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3220		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3225		BV	2	A	TRANS E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3230		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3231		BV	1/2	A	SAMPLE in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3235	VALVE	BV	3	A	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	A-052-V

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3240	VALVE	BV	1	A	BOTTOM tank dr in (air con)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3245		BV	3	A	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	A-009-V
3250	PUMP	BV	3	A	TANKS pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3255		CP	3 X 1.5	A	TANKS pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	A-024-P
3260		CV	3	A	TANKS pmp dis in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3265		BV	1	A	TANKS pmp dis in sample in/gauge cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3270		BV	1/2	A	TANKS pmp dis in sample in out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3275		BF	3	A	TANKS pmp basket filter	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3280				A	TANKS prod pmp filter pres relief	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3285		BV	1	A	TANKS prod pmp filter bot dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3286		BV	1	A	TANKS prod pmp filter bot dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3290		BV	1	A	TANKS prod in to load dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3295		BV	3	A	TANKS prod in to trk load hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3300		BV	2	A	TANKS prod in cut to trans/dm load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3305		BV	2	A	TANKS prod in to dm load in E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3310		BV	2	A	TANKS prod in to dm load in W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3315		BV	2	A	TANK prod in trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3320		BV	2	A	TANK prod in trans E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3325		BV	2	A	LINE in & frm trans E to 300 trks trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
3330		BV	3	A	LINE frm trans E to 300 trk trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4000		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4005		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4006		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4010		BV	3	B	BOTTOM tank dm (by tank) in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4015		BV	3/4	B	BOTTOM dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4020		BV	3	B	BOTTOM dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4025		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4030		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4031		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4035		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4040		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4045		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4050		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4051		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4055		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4060		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4065		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4070		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4071		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4075		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4080		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4085		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4090		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4091		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4095		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	B-010-V
4100		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4105		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4115		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4116		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT	OLD ID NO.
4120		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4128		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4130		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4135		BV	1	B	SAMPLE line (bottom)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4136		BV	1	B	SAMPLE line (bottom)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	B-029-V
4140		BV	1	B	SAMPLE line (middle)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4145		BV	1	B	SAMPLE line (top)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4150		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4155		BV	3/4	B	BOTTOM tank dm in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4160		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4165		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4170		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4171		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4175		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4180		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4185		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4190		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4191		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4195		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4200		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4205		BV	2	B	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4210		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4211		BV	1/2	B	SAMPLE line	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4215		BV	3	B	BOTTOM tank dm in (by tank)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4220		BV	3	B	BOTTOM tank dm in (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4225		BV	3	B	TANK trans pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4230		GV	1	B	TANK trans pmp in in dm	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4235	PUMP	CP	1 1/2 x 3	B	TANK trans pmp	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	B-021-P
4240		CV	3	B	TANK trans pmp dis chk val	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4245		GV	1	B	TRANS pmp dis in sample/gauge in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4250		BV	1/2	B	TRANS pmp dis in gauge in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4255		BV	1	B	Trans pmp dis in sample in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4260		BV	3	B	TRANS pmp dis in to trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4265		BV	2	B	TRANS pmp dis in to trans W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4270		BV	2	B	TRANS pmp dis in hose con (by pmp)	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4275		BV	3	B	TRANS pmp dis in to trans E	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
4280		BV	2	B	TRANS pmp dis in trans E hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5000		BV	3	C	TOP in in crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5001		PRV		C	Top Of T-101	Vapor	> 10%	Inspection/Monitoring		MONTHLY	
5005		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5010		BV	2	C	in/out in top of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5015		BV	2	C	in/out in bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5020		GV	6	C	BOTTOM of cone out to pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5025		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5030		BV	3	C	TOP in in at crude, trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5031		PRV		C	Top of crude tank T-102	Vapor	> 10%	Inspection/Monitoring		MONTHLY	
5035		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5040		BV	2	C	I/O in top cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	C-048-V
5045		BV	2	C	I/O in bot of cone to/fm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

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5050		GV	6	C	BOTTOM of cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5055		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5060		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5061		PRV		C	Top of crude tank T-103	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5065		BV	2	C	HOSE con I/O at top of tank	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5070		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5075		BV	2	C	I/O in top of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5080		BV	2	C	I/O in bot of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5085		GV	6	C	BOTTOM of cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5090		GV	6	C	BOTTOM cone clean out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5095		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5100		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5101		PRV		C	Top of crude tank T-104	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5105		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5110		BV	2	C	I/O in top of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5115		BV	2	C	I/O in bot cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5120		GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5125		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5130		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5131		PRV		C	Top of crude tank T-105	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5135		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5140		BV	2	C	I/O in top of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5145		BV	2	C	I/O in bot of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5150		GV	6	C	BOTTOM of cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5155		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5160		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5161		PRV		C	Top of crude tank T-106	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5165		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5170		BV	2	C	I/O in top of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5175		BV	2	C	I/O in bot of cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5180		GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5185		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5190		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5191		PRV		C	Top of crude tank T-107	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5195		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5200		BV	2	C	I/O in top cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5205		BV	2	C	I/O in bot cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5210		GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5215		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5220		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5221		PRV		C	Top of crude tank T-108	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5225		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5230		BV	2	C	I/O in top cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5235		BV	2	C	I/O in bot cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5240		GV	6	C	BOTTOM cone out to pmp in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5245		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5250		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5251		PRV		C	Top of crude tank T-109	Vapor	> 10 %	Inspection/Monitoring		MONTHLY	
5255		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	

LIDLAW ENVIRONMENTAL SERVICES - BARTOW  
EQUIPMENT LIST  
Rev. 03/10/83

EQUIPMENT ID#	EQUIPMENT CLASS	TYPE	SIZE	PROCESS AREA	LOCATION	SERVICE	CONC. TOT. ORGANICS	METHOD OF COMPLIANCE	INSPECTION REQUIREMENT	MONITORING REQUIREMENT	OLD ID NO.
5260		BV	2	C	I/O in top cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5265		BV	2	C	I/O in top cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5270		GV	6	C	BOTTOM cone out to pump in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5275		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5280		BV	3	C	TOP in in at crude trk load	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5281		PRV		C	Top of crude tank T-110	Vapor	>10%	Inspection/Monitoring		MONTHLY	
5285		BV	2	C	TRANS W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5290		BV	2	C	I/O in top cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5295		BV	2	C	I/O in bot cone to/firm trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	C-003-V
5300		GV	6	C	BOTTOM cone out to pump in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	C-002-V
5305		BV	2	C	MID cone out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5310		BV	3	C	T-105-T-109 isolation val, under T-110 bots in to pump	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5315		BV	3	C	T-105-T-110 out, in to trans in (T-110 side) b/w T-105 & T-110	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5320		BV	3	C	T-101-T-105 out, in to trans in (T-105 side) b/w T-105 & T-110	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5325		CV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5330		BV	1	C	AIR con in to 100s/trans in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5335		BV	2	C	HOSE con out 100 - trans W in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5337		BV	2	C	HOSE connection	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5340		BV	3/4	C	HOSE con out 100 - trans W in air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5345		BV	1/2	C	HOSE con out 100 - trans W in air con dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5350		CV	3/4	C	HOSE con out 100 - trans W in air con in ckval	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5355		BV	2	C	T00 trans W out b/w T-110/T-109	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5360		BV	1	C	T00 trans W out b/w T-110/T-109 dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5365		BV	2	C	TRANS W hose con firm T-100s bot	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5370		BV	3	C	TO crude pmp out, b/w T-102 & T-103	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5375		BV	3/4	C	CRUDE pmp in dm/air con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5380		BV	3	C	CRUDE in to dycon pmp b/w T-107 & 8	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5385		GV	3	C	CRUDE in to dycon, hose con N side dycon	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5390		BV	3	C	DYCON pmp in out firm 100 tks	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5395		GV	3	C	CRUDE in to dycon, hose con S side of dycon	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5400	PUMP	DP	3	C	CRUDE tank dycon pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5405		BV	3/4	C	DYCON pmp dis dm/air	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	C-050-P
5410		BV	3	C	DYCON pmp dis out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5415		BV	1/2	C	CRUDE tks gear pmp filter in dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5418		BV	1/2	C	CRUDE tks gear pmp filter in dm in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5420		BF	3	C	DOUBLE basket filter for gear pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5425	PUMP	GP	3	C	TRUCK load gear pmp	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5430		BV	3	C	TRUCK load gear pmp dis out	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	C-062-P
5435		BV	3	C	TRANS in firm crude trk load to trans W	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5440		BV	2	C	TRANS in firm crude trk load to trans W hose con	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5445		BV	2	C	CUT in trans W to T-105 in for Fuel Blend pmp under T-110	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5450		BV	2	C	FUEL blend pmp in cut	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5460	PUMP	CP	1.5 X 1	C	FUEL blend pmp (under T-110)	Liquid	> 10 %	Inspection/Monitoring	WEEKLY	MONTHLY	C-001-P
5465		CV	1	C	FUEL blend pmp dis in	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	
5470		BV	2	C	FUEL blend pmp dis out	Liquid	> 10 %	Inspection/Monitoring		MONTHLY	



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

# Interoffice Memorandum

---

TO: Satish Kastury  
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa  
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *Lynne 4/19*

DATE: April 16, 1993

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit File No. HO53-182726*  
*Annual Waste Minimization Certification*

---

Attached are documents dated April 9, 1993 and submitted April 12 1993 which are subject to the noted permit.

This package details:

1. One single page cover letter.
2. One statement of waste minimization activity.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV

lesbtran.doc

Certified Mail # P 809 530 464

**D.E.R.**

April 15, 1993

**APR 16 1993**

Ms. Lynne Milanian  
Hazardous Waste Permitting Branch  
Florida Department of Environmental Regulations  
3804 Coconut Palm Drive  
Tampa, FL 33619

**SOUTHWEST DISTRICT  
TAMPA**

RE: Class 1 Permit Modification  
Laidlaw Environmental Services Of Bartow, Inc.  
EPA ID # FLD 908 729 610  
Permit # H053-182726

*H053-229777*

Dear Ms. Milanian:

*Modification Material Placed in File 4-j*  
The enclosed is submitted as a Modification to the Hazardous Waste Permit for Laidlaw Environmental Services of Bartow, Inc. (LESB). The permit # is H053-182726. The following items are requested to be modified:

- A. To comply with the air emissions standards of the DER Air Division, LESB is adding air emissions controls. The Air Permit Application which included these controls was submitted to the Air Division on January 29, 1993. As a result of the added air emissions controls the T-100 tanks (T-101 to T-110) will incur a few changes/upgrades. The changes/upgrades do not include any major additions to the tanks, only replacement and upgrading of existing systems.

The changes/upgrades to be made include:

1. The existing flame arresters will be replaced by the air emissions manifold with a common flame arrester.
2. The current manual system of measuring the liquid levels in the tanks will be replaced by automatic level indicators.
3. The current sampling method calls for taking the sample from the tank manhole. This will be upgraded by providing a specific sampling port.

The tank diagrams of the T-100 tanks in Chapter 12 and Appendix E of the permit have been modified to include these changes/upgrades. These modified tank diagrams are included in Attachment A. The complete Air Permit Application is included as Attachment B as a reference document.

B. The contingency plan also is being modified. These modifications include:

1. Figure 9.1 has been revised to show the date of this modification.
2. Figure 9.3 and Table 9.2 has been revised to include a more accurate description and the location of the fire response equipment.
3. Figures 9.5 and 9.6 have been revised to indicate changes in the Emergency Coordinator and Alternates.
4. Figure 9.7 has been revised to remove the specific personnel names from the form letters.

These revised Contingency Plan Pages have been enclosed as Attachment C. Also, as required, the updated Contingency Plan will be submitted to the appropriate emergency response agencies once this modification is approved.

C. Figure 16.1 has also been revised to include the location of the Freon Wash Tank emissions vent. The revised Figure is included as Attachment D. [Chp. 16]

D. Condition II.4 of the permit reads as follows; "Storage of any incoming or outgoing bulk container shipments within the facility is not allowed except as an integral part of the shipment. The maximum time any such container may be situated within the facility shall not exceed 10 days. Storage of other containers outside of the drum storage building shall not exceed 24 hours. This condition does not apply to hazardous waste satellite collection containers or to hazardous waste sample containers having a volume of 0.5 gallons or less."

As discussed with DER personnel in a meeting at DER on 3/26/93 the wording of this permit condition is somewhat ambiguous. As part of this permit modification LESB is requesting this condition to be changed so as to clearly state the intent as arranged with Mr. Bill Crawford and Mr. Victor San Augustin (both formerly with FDER) during the permitting process in 1991. The condition should read as follows:

"Storage of any incoming or outgoing bulk container shipments within the facility is not allowed except as an integral part of the shipment. The maximum time any such container may be situated within the facility shall not exceed 10 days. Storage of other containers outside of the drum storage building when in line to be processed shall not exceed 24 hours. This condition does not apply to hazardous waste satellite collection containers or to hazardous waste sample containers having a volume of 0.5 gallons or less."

E. Another permit condition which is a little ambiguous and needs modification is I.3. It currently states, "This permit allows the permittee to store or blend into hazardous waste fuels only those wastes specified in Table 1.1 or 1.2 respectively, of the permit application. Prior to acceptance of new hazardous waste, the permittee shall submit for Department approval a request for a permit modification with a revised waste analysis plan for the proposed new waste stream. This analysis must also be incorporated in the general waste analysis plan and retained on site (264.13)."

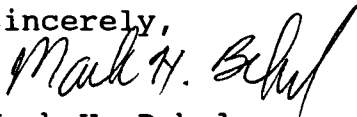
This permit condition should be revised to read as follows; "This permit allows the permittee to store or blend into hazardous waste fuels only those wastes specified in Table 1.1 or 1.2 respectively, of the permit application. Prior to acceptance of new hazardous waste codes, the permittee shall submit for Department approval a request for a permit modification with a revised waste analysis plan for the proposed new waste codes. This analysis must also be incorporated in the general waste analysis plan and retained on site (264.13)."

In the meeting at DER on 3/26/93, the refrigerated vent condensers currently on the three distillation units were also mentioned. As stated in the air permit application (Attachment B) these condensers will be removed and replaced with the emissions control equipment described in that application. These condensers are not included in the RCRA permit and hence not in this mod request. This information is given for clarification purposes.

As discussed with you on 4/6/93 this is being submitted as a class 1 permit modification. The applicable permit fee of \$250.00 is also enclosed.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,

  
Mark H. Behel

Enclosures

pc: Mike Merashoff w/o Attachment B  
Paul Manak w/o Attachment B  
Ashley Chadwick w/o Attachment B  
E. Lin Longshore w/o Attachment B  
Barbara Hamilton w/o Attachment B

**D.E.R.**

**APR 12 1993**

**SOUTHWEST DISTRICT**  
**TAMPA**

Certified Mail # P 809 530 457

April 9, 1993

Mr. Richard Garrity, Director  
Southwest District Office  
Florida Department of Environmental Regulation  
3804 Coconut Palm Drive  
Tampa, FL 33619

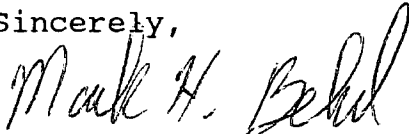
RE: Waste Minimization Program Certification  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA I.D. # FLD 980 729 610  
Permit # HO53-182726

Dear Mr. Garrity:

Enclosed is the Annual Waste Minimization Certification for LESB. It is being submitted as required by permit condition I.12. of the Specific Conditions of the facility's Hazardous Waste Permit.

If you have questions or need additional information feel free to contact me at 813-533-6111.

Sincerely,



Mark H. Behel  
Safety and Compliance Manager

enclosure

pc: E. Lin Longshore  
Ashley Chadwick  
Mike Merashoff

D.E.R.

APR 12 1993

SOUTHWEST DISTRICT  
TAMPA

**WASTE MINIMIZATION PROGRAM POLICY STATEMENT**

It is the policy of Laidlaw Environmental Services of Bartow, Inc., management to support waste minimization at the Bartow Facility and to have an active waste minimization plan. The Bartow management promotes employee awareness of and training programs designed to involve employee in waste minimization planning and implementation. It shall be the Bartow management practice to ensure waste minimization plans are part of ongoing efforts with respect to capital planning, production operations, and maintenance.

The waste minimization plan shall include steps to identify types, amounts, and hazardous constituents of waste streams throughout the facility, as well as, to provide for periodic waste minimization assessments. The waste minimization assessment should include steps to prevent waste generation or promote recycling at all possible points in the process. The waste minimization plan shall include specific steps for identifying waste management costs and for developing specific accountabilities for waste minimization.

The Bartow management will make efforts to seek and exchange technical information on waste minimization with other parts of LESI, other firms, trade associations, technical assistance programs, and professional consultants. Finally, the Bartow management will perform at minimum annual evaluation of the program in order to verify program effectiveness and revise the program as required.



Michael MeraShoff  
Facility Manager  
April 6, 1993

406PM004

D.E.R.

VIA CERTIFIED MAIL  
RECEIPT # 809 530 442

JAN 27 1993

January 20, 1993

SOUTHWEST DISTRICT TAMPA

Mr. Allen Farmer, Chief  
RCRA and Federal Facilities Branch  
Waste Management Division  
USEPA, Region IV  
345 Courtland Street, NE  
Atlanta, GA 30365

Re: Laidlaw Environmental Services of Bartow, Inc.  
EPA ID No. FLD 980 729 610

Dear Mr. Farmer

On August 3, 1983, EPA Issued a RCRA Permit to the initial owner of this facility, International Solvent Recovery, Inc. (ISR). A copy of the permit cover letter is attached.

In July 1986, Tricil Recovery Systems, Inc. (TRSI) acquired the facility from ISR. On May 25, 1991, the name was changed to Laidlaw Environmental Services of Bartow, Inc. (LESB) after the facility was acquired by Laidlaw Environmental Services, Inc.

Condition I.D.2. of the permit requires the permittee to re-apply for a new permit by submitting an application at least 180 days before the existing permit expires. The current permit expires on August 3, 1993, therefore the 180 day deadline is February 3, 1993.

LESB is requesting this permit be terminated therefore relieving LESB of the responsibility to re-apply as stated in Condition I.D.2. There are two reasons for this request. They are; 1) on December 10, 1991 LESB was issued a RCRA permit by the Florida Department of Environmental Regulation (DER), which operates a RCRA program which has been authorized and approved by EPA, 2) LESB was issued a HSWA permit by EPA on December 5, 1991.

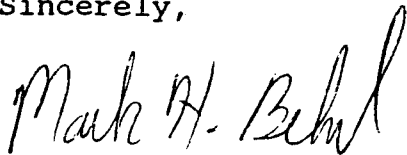
Given these two facts, the LESB facility is regulated by permits which cover all applicable requirements of RCRA as amended by HSWA and there is no need for duplicate permits.

Again, LESB is requesting the permit associated with the enclosed permit cover sheet to be terminated based on the information given above. If EPA disagrees that this permit should be terminated, please notify LESB in writing within 15 days of receiving this letter.

There is no record in our files of the permit being terminated. If in fact it has been previously terminated please excuse this duplicate request and forward a copy of the termination notice to me.

If you have questions or need additional information, feel free to contact me at (813) 533-6111.

Sincerely,

A handwritten signature in cursive script, reading "Mark H. Behel".

Mark Behel  
Safety and Compliance Manager

cc: Jim Green  
Ashley Chadwick  
Barbara Hamilton  
Lin Longshore  
Paul Manak  
Kent Williams - EPA  
Richard Garrity - DER



International Solvent Recovery, Inc.  
Bartow Airport Industrial Park  
Route #3 Post Office Box 235  
Bartow, Florida 33830



Bartow Municipal Airport Development  
Authority  
P.O. Box 650  
Bartow, Florida 33830

I.D. Number: FLD980729610  
Permit Number: FLD980729610

# Permit

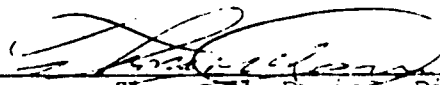
Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to International Solvent Recovery, Inc., and the Bartow Municipal Airport Development Authority (hereafter called the Permittees), as the operator and owner, respectively, to operate a hazardous waste storage facility located in Bartow, Florida, at Bartow Municipal Airport, at latitude N 25°57'15" and longitude W 81°46'50". These parties are jointly and severally liable and responsible for compliance with the terms and conditions of this permit.

The Permittees must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated November 30, 1982, as modified by subsequent amendments dated December 14, 1982, December 17, 1982, January 17, 1983, March 18, 1983, May 6, 1983, and May 24, 1983, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittees must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of August 3, 1983, in accordance with §270.41, and shall remain in effect until August 3, 1993, in accordance with §270.50, unless revoked and reissued, or terminated (40 CFR §§270.41 and .43) or continued in accordance with §270.51(a).

8/3/83  
Date Signed

  
Thomas W. Devine, Director  
Air and Waste Management Division

VIA CERTIFIED MAIL  
RECEIPT # P 809 530 444

January 4, 1993

Mr. Richard D. Garrity, Ph.D.  
Director of District Management  
Southwest District  
Florida Department of Environmental Regulation  
3804 Coconut Palm Drive  
Tampa, FL 33619

D. E. R.  
JAN - 7 1993  
SOUTHWEST DISTRICT  
TAMPA

RE: Operating Permit Modifications  
Permit # H053-182726  
Laidlaw Environmental Services of Bartow, Inc. (LESB)

Dear Dr. Garrity:

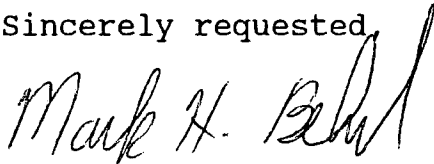
Thank you for your letter dated December 22, 1992 in which LESB was granted a permit modification to increase the number of pallets per row in the drum storage area and to add rupture discs to Tanks R-202 and R-203.

However, there were other requests made in the permit modification (dated 5/5/92 and 11/9/92), copy enclosed, which were not addressed in the 12/22/92 letter. One request was to also store containers of waste between the containment trench and the back wall of the Fuel Blending area (highlighted on the enclosed drawing). Additionally, items 1 and 3-7 on the enclosure were not addressed.

LESB would also appreciate your approval of these modification requests as soon as possible.

Should you have questions or need additional information feel free to contact me or Paul Manak at (813) 533-6111.

Sincerely requested,



Mark Behel  
Safety and Compliance Manager

Enclosure

cc: Paul Manak  
Ashley Chadwick  
E. Lin Longshore

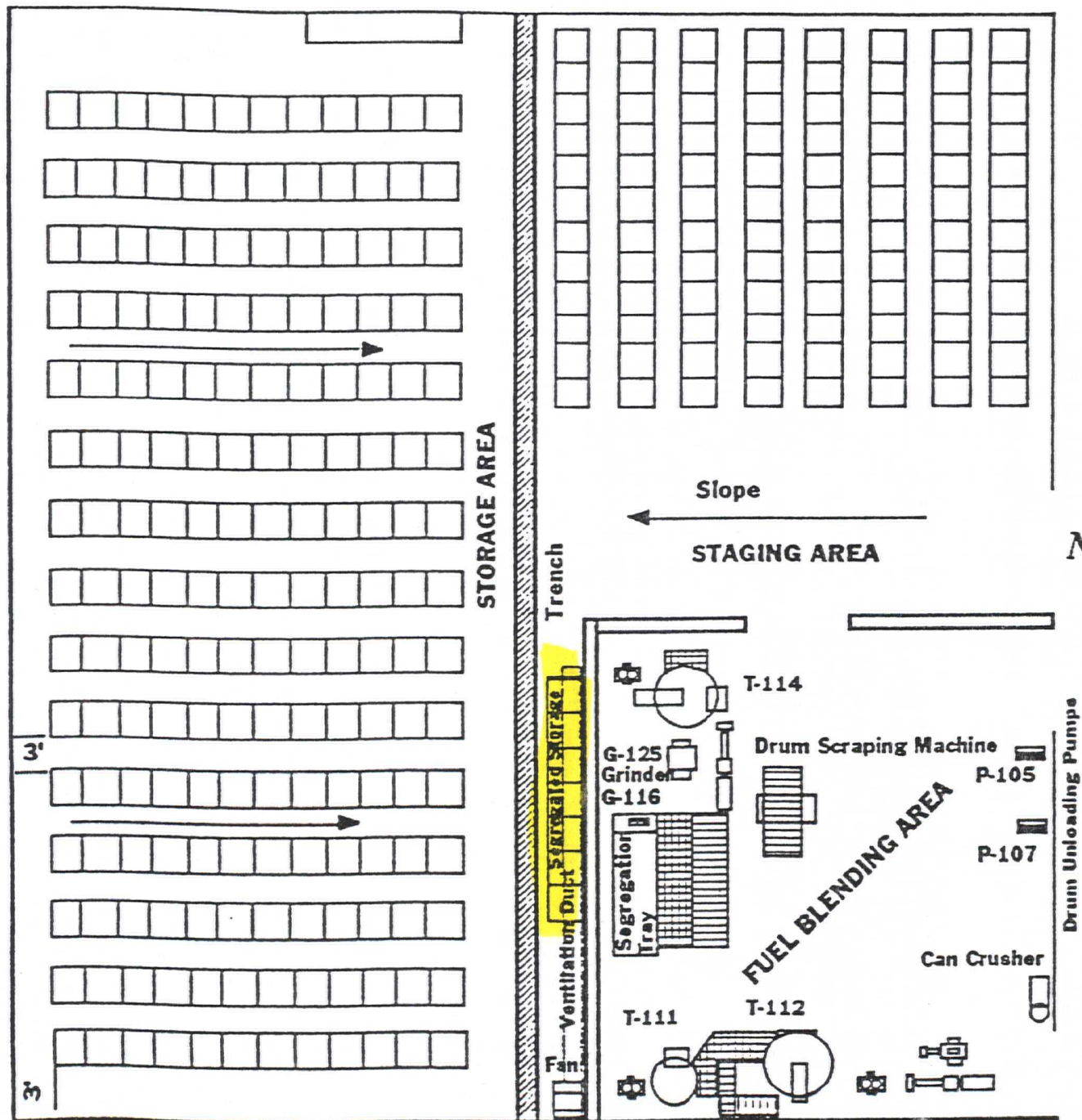


Figure 11.1 Arrangement of Pallets within the Drum Storage Building

VIA CERTIFIED MAIL  
RECEIPT # 809 530 374

November 9, 1992

Florida Department of Environmental Regulation  
3804 Coconut Palms Drive  
Tampa, Florida 33619-8319  
Attention: Lynne R. Milanian

Re: LESB FLD 980 729 610  
Request for Minor Modification of Permit H053-182726  
Status of Tank R-203

Dear Ms. Milanian:

This letter is submitted as a result of our meeting on October 30, 1992, and as an application for a minor modification to Operating Permit H053-182726 as outlined below.

Laidlaw Environmental Services of Bartow, Inc. understands that the FDER will approve the addition of rupture disks to tanks R-202 and R-203 as minor modifications and review all documents submitted to allow the return of tank R-203 to service following wall repairs. Laidlaw Environmental Services of Bartow, Inc. further understands that this agreement is contingent on Laidlaw Environmental Services of Bartow, Inc. responding to the concerns stated in your October 15, 1992 letter. In answer to those concerns, Laidlaw Environmental Services of Bartow, Inc. responds:

1. The tanks are only operated under vacuum or atmospheric pressure.
2. The material is removed from inside the tank by pumping and not by pressurizing the tanks.
3. We desire to maintain the rupture disks in place for overpressure protection of the tanks. Laidlaw Environmental Services of Bartow, Inc. agrees to maintain spare rupture disks and blind flanges on site and to replace the disks with a spare disk or blind flange within one hour of the rupture of either disk. Laidlaw Environmental Services of Bartow, Inc. further agrees to immediately curtail any operation which contributed to the excess pressure within the tank and to maintain the operation curtailed until a spare disk is installed.

4. Attached are revisions to the current Laidlaw Environmental Services of Bartow, Inc. operating permit application to reflect inspection of the rupture disks on the tank inspection log and changes to the tank specification diagram, E-5, noting the rupture disk addition and clearly reflecting all nozzle sizes as they exist.
5. Please note for the record, the agitator and drive have been temporarily removed from R-203 for maintenance and will be returned to service at a later date. This maintenance in no way impacts the fitness for use of the vessel.

In addition to tanks R-202 and R-203, Laidlaw Environmental Services of Bartow, Inc., requests a minor modification of the referenced Operating Permit in order to incorporate the following changes as previously submitted as a modification on May 5, 1992 (copy attached):

1. Page 6-4: Figure 6.2 (Weekly Container Storage and Driveway Inspection Checklist) has been revised to include inspections of containers stored at the distillation area and at the product loading area, as well as the storage building.
2. Page 11-3: Figure 11.1 (Arrangement of Pallets within the Drum Storage Building) has been revised to include storage of containers in rows 12 pallets in length and double stacked in the container storage area and to include an area designated for segregated storage of containers between the building trench and the fuel blending area wall.
3. Page 4-7: The revised page corrects typographical errors which were found in the previous version.
4. Updated Closure Cost Letter of Credit to replace the old document in Chapter Fourteen.
5. Page 17-8: Completes 40 CFR 264, Subpart BB, with the addition of procedures for designating equipment as difficult-to-monitor or no detectable emissions.
6. Page 17-14: Figure 17.6 (Weekly Pump Inspection Log) is added for documenting compliance with 40 CFR 264, Subpart BB.
7. Pages 17-15: Figure 17.7 (Equipment Difficult to Monitor Log) and 17-16: Figure 17.8 (Equipment With No Detectable Emissions) are forms on which to record equipment designated per section 17.13, added above.

Attached is a check for \$250.00 as a fee for the processing of this minor modification request.

We desire to return tank R-203 to service immediately, as has been expressed. If you require further evidence to document repair of this vessel and fitness for use, please contact Mark Behel or me at (813) 533-6111. Likewise, if additional information is required to process the modification request, please contact us immediately. Four copies of this letter are enclosed.

Respectfully Requests

A handwritten signature in black ink that reads "Paul W. Manak". The signature is written in a cursive style with a large, stylized "R" at the end.

Paul W. Manak  
Facility Manager

cc: Jim Green  
Barbara Hamilton  
Lin Longshore  
Ashley Chadwick  
Mark Behel  
Larry Becker

3018A

PERMIT COVER MEMO

*modification filed in folder 4-h*

TO: RICK GARRITY, Director of District Management

FROM/THROUGH:

William Kutash, ENVIRONMENTAL ADMINISTRATOR  
Gari Santti *GL*, PROGRAM SUPERVISOR  
Lynne R. Milanian, DISTRICT ENGINEER *LRM 11/23*

DATE: November 1992

FILE NAME: Laidlaw Env. Services  
PROGRAM : Hazardous Waste

PERMIT #: HO53-182726  
COUNTY : Polk

*4-h*

TYPE OF PERMIT ACTION: ☐ ISSUE ☐ DENY ☒ MODIFY  
☐ TRANSFER OWNER ☐ NOD  
☐ PUBLIC NOTICE ☐ INTENT

PUBLIC NOTICE PERIOD CLOSED? Not Applicable

PERMIT SUMMARY: The *first* modification has been requested as Laidlaw has determined that storage arrangements in the container section were not being maximized. The *second* modification is due to inspection of the two tanks R-202 and R-203 by FDER officials, which lead to the discovery that these tanks were not being operated as originally presented in the operating permit application. Thus the need for permit modification.

PROFESSIONAL RECOMMENDATION: ☒ APPROVE ☐ DENY

EVALUATION SUMMARY: The necessary revisions have been made to the application to support the requested modifications. Additionally, the RCRA compliance/enforcement staff is seeking penalties for the noted permit inconsistencies concerning the two tanks.

DAY 60 FOR THIS ACTION IS January 20, 1992

lrm

lesbcovm.doc



# Florida Department of Environmental Regulation

**Southwest District**

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

NOV 25 1992

Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

182726 4 - 1

Re: Laidlaw Environmental Services of Bartow, FLD 980 729 610  
Operating Permit No. HO53-182726  
Certification for Continued Use of Tank R - 203

Dear Mr. Manak:

The Florida Department of Environmental Regulation (FDER) has completed its review of the certification package dated October 2, 1992 and addendum submitted November 12, 1992 to demonstrate compliance with the tank requirements of 264 CRF Subpart J rules concerning the return of Tank R - 203 to service.

These documents substantiate that Laidlaw has complied with the specific conditions of the permit and the regulations governing tank operation. Your certification of Tank R - 203 being fit for service has been accepted by the FDER.

Should you have any questions, contact me at (813) 744-6100, extension 372.

Sincerely,

Lynne R. Milanian  
Permitting Engineer  
Hazardous Waste Program  
Division of Waste Management

lrm

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

lesb.doc





# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

NOV 17 1992

Laidlaw Environmental Services of Bartow, Inc.  
170 Bartow Municipal Airport  
Bartow, Florida 33830 - 9504

Attention: Mr. Paul Manak  
Facility Manager

Re: Laidlaw Environmental Services of Bartow, Inc., FLD 980 729 610  
Operating Permit HO53-182726 Polk County  
Hazardous Waste

Dear Mr. Manak:

This letter is to inform you that on July 20, 1992 the Florida Department of Environmental Regulation (FDER) received EPA authorization for the Toxicity Characteristic Leaching Procedure (TCLP) regulations. All permit conditions related to TCLP requirements are now effective and all TCLP waste codes must now be managed in accordance with the permit. Revision of your EPA/Region IV HSWA permit, if issued, to delete TCLP waste code authorization is not required.

This letter must be attached to the original permit and becomes part of that permit. If you have any questions regarding state TCLP authorization, please call Lynne R. Milanian of the Hazardous Waste Program at (813) 744 - 6100 extension 372.

Sincerely,

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

lrm

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

ldbrlet.doc

VIA CERTIFIED MAIL  
RECEIPT # 809 530 374

D.E.R.  
NOV 12 1992  
Southwest District Tampa

November 9, 1992

Florida Department of Environmental Regulation  
3804 Coconut Palms Drive  
Tampa, Florida 33619-8319  
Attention: Lynne R. Milanian

Re: LESB FLD 980 729 610  
Request for Minor Modification of Permit H053-182726  
Status of Tank R-203

Dear Ms. Milanian:

This letter is submitted as a result of our meeting on October 30, 1992, and as an application for a minor modification to Operating Permit H053-182726 as outlined below.

Laidlaw Environmental Services of Bartow, Inc. understands that the FDER will approve the addition of rupture disks to tanks R-202 and R-203 as minor modifications and review all documents submitted to allow the return of tank R-203 to service following wall repairs. Laidlaw Environmental Services of Bartow, Inc. further understands that this agreement is contingent on Laidlaw Environmental Services of Bartow, Inc. responding to the concerns stated in your October 15, 1992 letter. In answer to those concerns, Laidlaw Environmental Services of Bartow, Inc. responds:

1. The tanks are only operated under vacuum or atmospheric pressure.
2. The material is removed from inside the tank by pumping and not by pressurizing the tanks.
3. We desire to maintain the rupture disks in place for overpressure protection of the tanks. Laidlaw Environmental Services of Bartow, Inc. agrees to maintain spare rupture disks and blind flanges on site and to replace the disks with a spare disk or blind flange within one hour of the rupture of either disk. Laidlaw Environmental Services of Bartow, Inc. further agrees to immediately curtail any operation which contributed to the excess pressure within the tank and to maintain the operation curtailed until a spare disk is installed.

4. Attached are revisions to the current Laidlaw Environmental Services of Bartow, Inc. operating permit application to reflect inspection of the rupture disks on the tank inspection log and changes to the tank specification diagram, E-5, noting the rupture disk addition and clearly reflecting all nozzle sizes as they exist.
5. Please note for the record, the agitator and drive have been temporarily removed from R-203 for maintenance and will be returned to service at a later date. This maintenance in no way impacts the fitness for use of the vessel.

In addition to tanks R-202 and R-203, Laidlaw Environmental Services of Bartow, Inc., requests a minor modification of the referenced Operating Permit in order to incorporate the following changes as previously submitted as a modification on May 5, 1992 (copy attached):

1. Page 6-4: Figure 6.2 (Weekly Container Storage and Driveway Inspection Checklist) has been revised to include inspections of containers stored at the distillation area and at the product loading area, as well as the storage building.
2. Page 11-3: Figure 11.1 (Arrangement of Pallets within the Drum Storage Building) has been revised to include storage of containers in rows 12 pallets in length and double stacked in the container storage area and to include an area designated for segregated storage of containers between the building trench and the fuel blending area wall.
3. Page 4-7: The revised page corrects typographical errors which were found in the previous version.
4. Updated Closure Cost Letter of Credit to replace the old document in Chapter Fourteen.
5. Page 17-8: Completes 40 CFR 264, Subpart BB, with the addition of procedures for designating equipment as difficult-to-monitor or no detectable emissions.
6. Page 17-14: Figure 17.6 (Weekly Pump Inspection Log) is added for documenting compliance with 40 CFR 264, Subpart BB.
7. Pages 17-15: Figure 17.7 (Equipment Difficult to Monitor Log) and 17-16: Figure 17.8 (Equipment With No Detectable Emissions) are forms on which to record equipment designated per section 17.13, added above.

Attached is a check for \$250.00 as a fee for the processing of this minor modification request.

We desire to return tank R-203 to service immediately, as has been expressed. If you require further evidence to document repair of this vessel and fitness for use, please contact Mark Behel or me at (813) 533-6111. Likewise, if additional information is required to process the modification request, please contact us immediately. Four copies of this letter are enclosed.

Respectfully Requests

A handwritten signature in black ink that reads "Paul W. Manak". The signature is written in a cursive style with a large, stylized "R" at the end.

Paul W. Manak  
Facility Manager

cc: Jim Green  
Barbara Hamilton  
Lin Longshore  
Ashley Chadwick  
Mark Behel  
Larry Becker

3018A

# 1 DAILY TANKS INSPECTION CHECKLIST

Date									Comments
Time									
Inspector									

## South Tank Farm (Crude Storage)

<b>Tanks</b>									
Evidence of Waste Release									
Evidence of Stress									
Corrosion									
Level Alarms Functioning									

<b>Containment Area and Sump</b>									
Evidence of Waste Release									
Insufficient Capacity									
Cracks									

<b>Ancillary Equipment, Pipes and Fittings</b>									
Evidence of Waste Release									
Evidence of Stress									
Corrosion									

<b>Driveway and Overhead Piping</b>									
Evidence of Waste Release									
Evidence of Stress									
Corrosion									
Cracks									

## West Tank Farm (R-202/R-203)

Evidence of Waste Release									
Evidence of Stress									
Corrosion									
Level Alarms Functioning									
Rupture Disk Check									

## Fuel Blending Process Area

<b>Tanks</b>									
Evidence of Waste Release									
Evidence of Stress									
Corrosion									

<b>Ancillary Equipment, Pipes and Fittings</b>									
Evidence of Waste Release									
Evidence of Stress									
Corrosion									

<b>Containment Area</b>									
Evidence of Waste Release									
Standing Liquid									
Cracks									

No Problem Found                      \*Potential Problem, see Comments

Figure 6.1 Daily Tanks Inspection Checklist

# **R.O. COVINGTON & ASSOCIATES**

## **CONSULTING ENGINEERS**

Bartow Industrial Park  
225-A Bartow Municipal Airport  
Bartow, Florida 33830-9504  
Phone: (813) 533-6282  
Fax: (813) 534-1723

November 9, 1992

Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, FL 33830

Dear Mr. Manak:

Ref: 2Y010

Subject: Equipment Verification

Enclosed is the data sheet you requested for plant equipment number R-202 and R-203. The information shown is based upon vendor data, field measurements, and observations of both tanks.

The two insulated tanks are of equal construction, based upon information provided by LESB. The accessible nozzles that were checked November 9, 1992 confirmed vessel configuration shown. The nozzle flanges and coupling ratings are based upon a comparison of measured metal thicknesses to manufactures data, that in turn was derived from ANSI Standards.

Your truly,



Robert O. Covington, P.E.

#16041

ROC/ve  
enclosures

PROJECT BARTOW SOLVENT RECOVERY PLANT  
EQUIPMENT NO. R-203/R-202

PREPARED BY R.O. COVINGTON  
CHECKED BY PWM  
REV. NO. C NOV 92

EQUIPMENT NAME BOTTOMS TANKS  
TOTAL NUMBER REQUIRED TWO (2)

**DESIGN DATA**

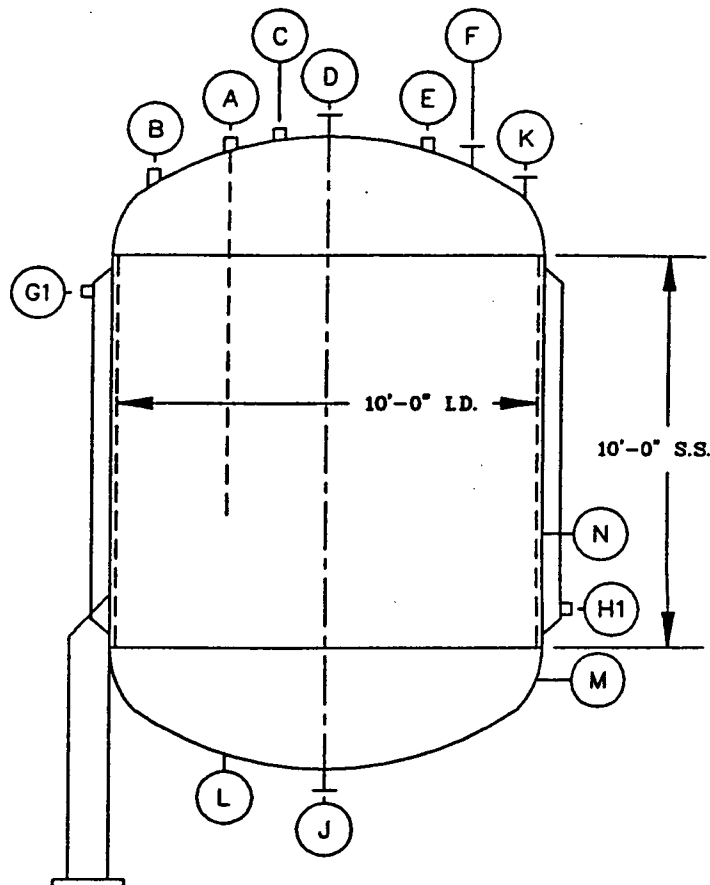
MAX OPERATING PRESSURE	28" Hg VACUUM	PSIG
DESIGN PRESSURE	FULL VACUUM	PSIG
MAX OPERATING TEMPERATURE	260	° F
DESIGN TEMPERATURE	300	° F
CORROSION ALLOWANCE	*	IN
RADIOGRAPHY	*	
STRESS RELIEVED	NONE	
CODE	*	
ESTIMATED WEIGHT (EMPTY)	*	LBS
JACKET DESIGN PRESSURE	*	

**MATERIAL SPECIFICATION**

SHELL -	CARBON STEEL
INTERNALS -	CARBON STEEL
LINING -	NONE
SUPPORTS -	CARBON STEEL LEGS
INSTALLATION -	3/4" FIBERGLASS
JACKET -	CARBON STEEL

**NOZZLE SCHEDULE**

NOZZLE	MARK NO.	QTY.	SIZE, IN.	RATING
FEED	A	1	6"	150#
VACUUM BREAK	B	1	3"	SCHD. 40
VACUUM SOURCE	C	1	1"	150#
AGITATOR	D	1	16"	150#
PRESSURE DISK	E	1	3"	150#
LEVEL SENSOR	F	1	2"	3000#
STEAM IN	G	1	2"	3000#
CONDENSATE	H	1	2"	3000#
BOTTOM	J	1	1"	150#
MAN WAY	K	1	16"	150#
PLUGGED	L	1	2"	3000#
PLUGGED	M	1	3/4"	3000#
PLUGGED	N	1	3/4"	3000#



**REMARKS**

- 1) TANK VOLUME IS 6000 GALLONS.
- 2) NOZZLE "A" IS FITTED WITH DIP PIPE AND 1/4" WEEP HOLE.
- 3) NOZZLE "E" IS FITTED WITH 27.25 PSI RUPTURE DISK (NOV 92).
- 4) NOZZLE SIZES FIELD VERIFIED (NOV 92).
- 5) FLANGE RATINGS AND COUPLING RATING BASED ON FIELD MEASURED THICKNESS.

## WEEKLY CONTAINER STORAGE AND DRIVEWAY INSPECTION CHECKLIST

Date							
Time							
Inspector							

### **Drum Storage**

Inadequate Aisle Space							
Improper Placement							
Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Cracks in Floor							
Liquid or Debris in Trench							
Absorbent Not Available							

### **Loading Dock**

Cracks							
Erosion							
Spills							

### **Distillation Pad**

Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Absorbent Not Available							
Sumps Deteriorated, Full							
Trenches Deteriorated							

### **Product Loading**

Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Absorbent Not Available							

### **Driveway**

Cracks							
Erosion							
Spills							

✓ No Problem    \* Potential Problem, see Comments

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Figure 6.2 Weekly Container Storage and Driveway Inspection Checklist



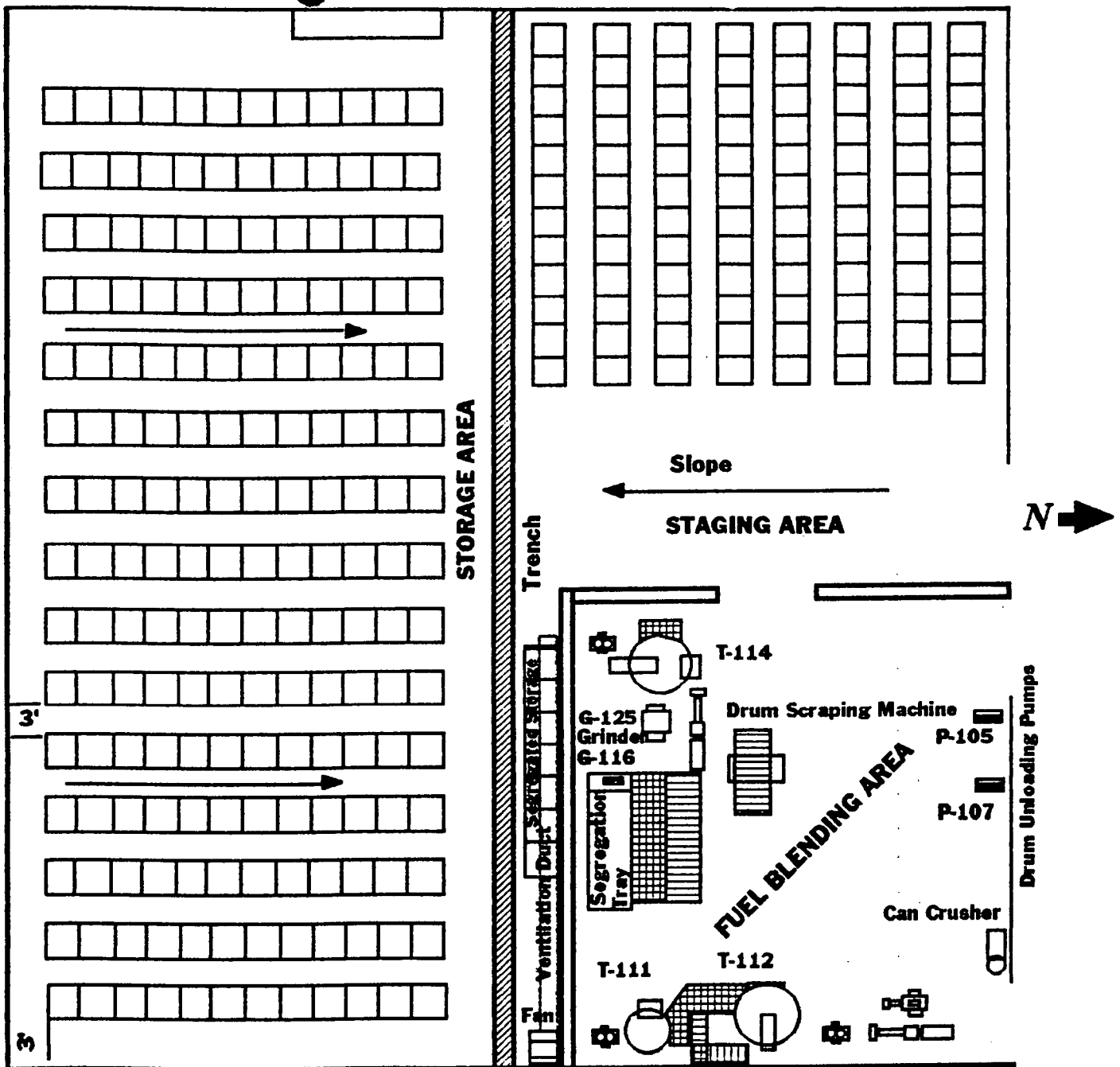


Figure 11.1 Arrangement of Pallets within the Drum Storage Building

### 4.3 In-Processing of Waste Shipments

#### 4.3.1 In-Processing of Containers

When a waste shipment arrives at LESB in containers, the shipment immediately undergoes a preliminary evaluation to verify that the markings on the containers match the shipment as described on the accompanying manifest. Any discrepancies noted on the manifest will be resolved with the generator and/or transporter. Additionally, the condition of each container is inspected. Containers of questionable integrity are overpacked before subsequent in-processing is continued.

In order to ascertain the chemical and physical characteristics of a waste shipment, a representative sample from each container will be obtained using appropriate sampling methods. A Gravity Sheet Form (Custody Sheet), presented in Figure 4.3 as an example only, is used to document chain-of-custody for containerized waste.

The appearance and remarks pertaining to the phase of each sample will be measured and recorded. Based on this information, a determination will be made regarding which containers can be composited for the waste characterization.

#### 4.3.2 In-Processing of Tank Trucks

Documentation of a waste sample's chain-of-custody will be initiated after a container or tank truck is sampled. A Tank Truck Receipts form, presented in Figure 4.4 as an example only, is used to document chain-of-custody for waste obtained from a tank truck shipment. The chain-of-custody document ensures the ability to trace the possession and handling of samples from the time of initial sampling through analysis.

### 4.4 Waste Characterization, Methods, Rationale and Process Tolerance Limits

#### 4.4.1 Waste Characterization

In order to adequately characterize wastes prior to reclamation, a waste analysis will be conducted on a representative sample of the waste. The waste analysis required by LESB will include the following parameters:

April 20, 1992

RECEIVED

APR 21 1992

L A I D L A W

**CERTIFIED MAIL #P 857 255 388**  
**RETURN RECEIPT REQUESTED**

Ms. Lorraine G. Clark  
Florida Department of Environmental Regulation  
Bureau of Waste Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

RE: Laidlaw Environmental Services of Bartow, Inc.  
Bartow, Florida  
EPA ID #FLD 980 729 610

Dear Ms. Clark:

Please find attached Amendment Number 2 to Letter of Credit Number 1475/S-00184, which is amended by Letter of Credit Number 1269/S00588, for the above referenced facility. This Letter of Credit reflects the 1992 inflation factor for closure/post closure care costs and also the facility's name change from Tricil Recovery Services, Inc. to Laidlaw Environmental Services of Bartow, Inc. All other terms and conditions of the Letter of Credit remain unchanged.

Should you have any questions, please contact me at (803) 798-2993.

Sincerely,



Cindy Taylor,  
Environmental Affairs Department

/ct

Attachment

cc: Lin Longshore  
Ashley Chadwick  
Steve Taylor  
Elaine Jenkins

PIERREFONT PLAZA  
300 CADMAN PLAZA WEST  
BROOKLYN, NEW YORK 11201-2701

DATE: 16APR92

STAND-BY LETTER OF CREDIT NUMBER: 1475/S00184

EXPIRY DATE: 21SEP92

PLACE OF EXPIRY: AT OUR COUNTERS

**APPLICANT:**

TRICIL RECOVERY SERVICES INC.  
ROUTE 3, BOX 249  
BARTOW MUNICIPAL AIRPORT  
AVENUE D NORTH  
BARTOW, FLORIDA 33830-9504

**BENEFICIARY:**

SECRETARY  
BUREAU OF WASTE MANAGEMENT  
FLORIDA DEPARTMENT OF ENVIRONMENTAL  
REGULATION  
TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8014  
GENTLEMEN,

**AMOUNT:**

USD \*\*\*\*\*155,890.00  
ONE HUNDRED FIFTY FIVE THOUSAND  
EIGHT HUNDRED NINETY AND 00/100  
USD

THE ABOVE CREDIT IS AMENDED AS FOLLOWS:

1) CREDIT AMOUNT INCREASED BY US\$6,140.00 MAKING NEW TOTAL AMOUNT  
NOW ISSUED US\$155,890.00 (UNITED STATES DOLLARS ONE HUNDRED FIFTY  
FIVE THOUSAND EIGHT HUNDRED NINETY AND 00/100).

2) APPLICANT'S NAME IS AMENDED TO READ:


LAWLAW ENVIRONMENTAL SERVICES OF BARTOW INC.  
EPA ID# 980 729 410

3) LETTER OF CREDIT NO. 1475/S00184 IS AMENDED TO READ 1267/S00588.  
PLEASE NOTE YOUR RECORDS AND MAKE REFERENCE TO LETTER OF CREDIT  
NO. 1267/S00588 IN ALL FUTURE CORRESPONDENCE.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

IF THIS AMENDMENT IS NOT ACCEPTABLE TO YOU, PLEASE NOTIFY  
US WITHIN FIFTEEN (15) DAYS FROM DATE OF THIS AMENDMENT.

THIS AMENDMENT IS TO BE CONSIDERED AS PART OF THE ABOVE  
CREDIT AND MUST BE ATTACHED THERETO.

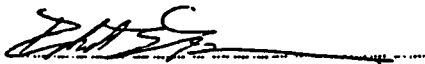
  
AUTHORIZED SIGNATURE

  
AUTHORIZED SIGNATURE

\* SEE NEXT PAGE \*

CONTINUATION OF L/C REFERENCE 800588 01

THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR  
DOCUMENTARY CREDITS (1993 REVISION), INTERNATIONAL CHAMBER OF  
COMMERCE - PUBLICATION NO. 400.



AUTHORIZED SIGNATURE



AUTHORIZED SIGNATURE

17.12. Reporting (264.1065) (60.487) (61.247)

If leaks from valves, pumps, and compressors are repaired as described in this chapter, and control devices do not exceed or operate outside of design specifications for more than 24 hours, a report to the Regional Administrator is not required.

If required, a semiannual report will be sent to the Regional Administrator, by the dates specified by the Regional Administrator, which will include the following information:

1. The EPA ID number, name, and address of the facility.
2. For each month during the reporting period, the ID number of each valve, pump, or compressor for which a leak was not repaired as required by Subpart BB.
3. Dates of hazardous waste unit shutdowns that occurred within the reporting period.
4. For each month during the reporting period, the dates when control devices exceeded or operated outside of the design specifications and were not corrected within 24 hours, the duration and cause of each exceedance, and any corrective measures taken.

17.13 Monitoring of equipment designated for no detectable emissions or difficult-to-monitor.

Equipment designated for no detectable emissions or as difficult-to-monitor shall be inspected visually on a monthly basis. Potential leaks will be recorded and repaired according to the provisions of this chapter. After repairs are completed, the equipment will be monitored immediately for leaks, and monthly thereafter until it can again meet the requirements for no detectable emissions.

Equipment designated for no detectable emissions or as difficult-to-monitor will be monitored at intervals not to exceed twelve months, providing that no leaks are detected.

0746A

## 40CFR264 SUBPART BB WEEKLY PUMP INSPECTION LOG

[illegible]

**Figure 17.6 Weekly Pump Inspection Log**

## 40CFR264 SUBPART BB EQUIPMENT DIFFICULT TO MONITOR

[illegible]

Figure 17.7 Equipment Difficult to Monitor Log



## 40CFR264 EQUIPMENT WITH NO DETECTABLE EMISSIONS

DATE: \_\_\_\_\_

**FACILITY MANAGER SIGNATURE:**

[illegible]

**Figure 17.8 Equipment With No Detectable Emissions**

## HAND-DELIVERY RECEIPT

Document: Request for Minor Modification of Permit # HO53-182726  
Laidlaw Environmental Services of Bartow, Inc.

Date Delivered: May 5, 1992

Delivered by: Steve Taylor

Received by: Walter P. Crawford

Florida Department of Environmental Regulation



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Satish Kastury  
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa  
Hazardous Waste Regulation *AS*

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *Lynne 11/16*

DATE: November 16, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610  
Operating Permit File No. HO53-182726  
Request for "Minor " Permit Modifications *and*  
Status of Tank R - 203

Attached are documents dated November 9, 1992 and submitted November 12 1992 which are subject to the noted permit.

This package details:

1. One three page cover letter requesting various permit modifications.
2. Narrative changes to be placed in the application.
3. Explanations to indicate tank r - 203 is fit for service.

Please provide any comments you may have within thirty days.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV

lesbtran.doc

*29  
92*

VIA CERTIFIED MAIL  
RECEIPT # 809 530 374

D.E.R.

November 9, 1992

NOV 12 1992

*Attachments Placed in Active  
Application*

SOUTHWEST DISTRICT TAMPA  
Florida Department of Environmental Regulation  
3804 Coconut Palms Drive  
Tampa, Florida 33619-8319  
Attention: Lynne R. Milanian

H053-221692

Re: LESB FLD 980 729 610  
Request for Minor Modification of Permit H053-182726  
Status of Tank R-203

Dear Ms. Milanian:

This letter is submitted as a result of our meeting on October 30, 1992, and as an application for a minor modification to Operating Permit H053-182726 as outlined below.

Laidlaw Environmental Services of Bartow, Inc. understands that the FDER will approve the addition of rupture disks to tanks R-202 and R-203 as minor modifications and review all documents submitted to allow the return of tank R-203 to service following wall repairs. Laidlaw Environmental Services of Bartow, Inc. further understands that this agreement is contingent on Laidlaw Environmental Services of Bartow, Inc. responding to the concerns stated in your October 15, 1992 letter. In answer to those concerns, Laidlaw Environmental Services of Bartow, Inc. responds:

1. The tanks are only operated under vacuum or atmospheric pressure.
2. The material is removed from inside the tank by pumping and not by pressurizing the tanks.
3. We desire to maintain the rupture disks in place for overpressure protection of the tanks. Laidlaw Environmental Services of Bartow, Inc. agrees to maintain spare rupture disks and blind flanges on site and to replace the disks with a spare disk or blind flange within one hour of the rupture of either disk. Laidlaw Environmental Services of Bartow, Inc. further agrees to immediately curtail any operation which contributed to the excess pressure within the tank and to maintain the operation curtailed until a spare disk is installed.

5892

4. Attached are revisions to the current Laidlaw Environmental Services of Bartow, Inc. operating permit application to reflect inspection of the rupture disks on the tank inspection log and changes to the tank specification diagram, E-5, noting the rupture disk addition and clearly reflecting all nozzle sizes as they exist.
5. Please note for the record, the agitator and drive have been temporarily removed from R-203 for maintenance and will be returned to service at a later date. This maintenance in no way impacts the fitness for use of the vessel.

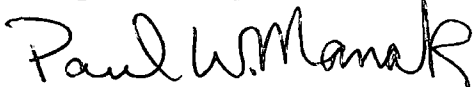
In addition to tanks R-202 and R-203, Laidlaw Environmental Services of Bartow, Inc., requests a minor modification of the referenced Operating Permit in order to incorporate the following changes as previously submitted as a modification on May 5, 1992 (copy attached):

1. Page 6-4: Figure 6.2 (Weekly Container Storage and Driveway Inspection Checklist) has been revised to include inspections of containers stored at the distillation area and at the product loading area, as well as the storage building.
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7. Pages 17-15: Figure 17.7 (Equipment Difficult to Monitor Log) and 17-16: Figure 17.8 (Equipment With No Detectable Emissions) are forms on which to record equipment designated per section 17.13, added above.

Attached is a check for \$250.00 as a fee for the processing of this minor modification request.

We desire to return tank R-203 to service immediately, as has been expressed. If you require further evidence to document repair of this vessel and fitness for use, please contact Mark Behel or me at (813) 533-6111. Likewise, if additional information is required to process the modification request, please contact us immediately. Four copies of this letter are enclosed.

Respectfully Requests

A handwritten signature in black ink that reads "Paul W. Manak". The signature is written in a cursive style with a large, stylized "P" and "M".

Paul W. Manak  
Facility Manager

cc: Jim Green  
Barbara Hamilton  
Lin Longshore  
Ashley Chadwick  
Mark Behel  
Larry Becker

3018A

RECEIVED

OCT 08 1992

LAIDLAW

May 5, 1992

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Bill Crawford, Hazardous Waste

Re: Request for Minor Modification of permit # HO53-182726  
Laidlaw Environmental Services of Bartow, Inc., FLD 980 729 610

Dear Mr. Crawford;

Laidlaw Environmental Services of Bartow, Inc., requests a minor modification of the referenced Hazardous Waste Facility Operating Permit in order to incorporate the following changes:

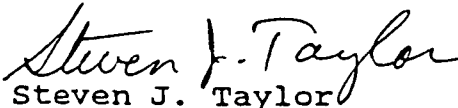
- Page 6-4: Figure 6.2 (Weekly Container Storage and Driveway Inspection Checklist) has been revised to include inspections of containers stored at the distillation area and at the product loading area, as well as the storage building.
- Page 11-3: Figure 11.1 (Arrangement of Pallets within the Drum Storage Building) has been revised to include an area designated for segregated storage of containers between the building trench and the fuel blending area wall.
- Page 4-7: The revised page corrects typographical errors which were found in the previous version.
- Updated Closure Cost Letter of Credit to replace the old document in Chapter Fourteen.
- Page 17-8: Completes 40 CFR 264, Subpart BB, with the addition of procedures for designating equipment as difficult-to-monitor or no detectable emissions.
- Page 17-14: Figure 17.6 (Weekly Pump Inspection Log) is added for documenting compliance with 40 CFR 264, Subpart BB.

*Received by hand during Oct 30, 1992 meeting*

- Pages 17-15 (Figure 17.7 Equipment Difficult to Monitor Log) and 17-16 (Figure 17.8 Equipment With No Detectable Emissions) are forms on which to record equipment designated per section 17.13, added above.

I have enclosed four copies of this letter and requested changes. Please contact me if you have any questions.

Sincerely,



Steven J. Taylor  
Safety and Compliance Manager

mc: Paul Manak  
Ashley Chadwick

2493



## WEEKLY CONTAINER STORAGE AND DRIVEWAY INSPECTION CHECKLIST

Date							
Time							
Inspector							

### Drum Storage

Inadequate Aisle Space							
Improper Placement							
Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Cracks in Floor							
Liquid or Debris in Trench							
Absorbent Not Available							

### Loading Dock

Cracks							
Erosion							
Spills							

### Distillation Pad

Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Absorbent Not Available							
Sumps Deteriorated, Full							
Trenches Deteriorated							

### Product Loading

Container Defects, Leaks							
Open Lids or Bungs							
Labels Missing, Incomplete							
Pallets Unsafe							
Absorbent Not Available							

### Driveway

Cracks							
Erosion							
Spills							

✓ No Problem    \* Potential Problem, see Comments

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Figure 6.2 Weekly Container Storage and Driveway Inspection Checklist

### 4.3 In-Processing of Waste Shipments

#### 4.3.1 In-Processing of Containers

When a waste shipment arrives at LESB in containers, the shipment immediately undergoes a preliminary evaluation to verify that the markings on the containers match the shipment as described on the accompanying manifest. Any discrepancies noted on the manifest will be resolved with the generator and/or transporter. Additionally, the condition of each container is inspected. Containers of questionable integrity are overpacked before subsequent in-processing is continued.

In order to ascertain the chemical and physical characteristics of a waste shipment, a representative sample from each container will be obtained using appropriate sampling methods. A Gravity Sheet Form (Custody Sheet), presented in Figure 4.3 as an example only, is used to document chain-of-custody for containerized waste.

The appearance and remarks pertaining to the phase of each sample will be measured and recorded. Based on this information, a determination will be made regarding which containers can be composited for the waste characterization.

#### 4.3.2 In-Processing of Tank Trucks

Documentation of a waste sample's chain-of-custody will be initiated after a container or tank truck is sampled. A Tank Truck Receipts form, presented in Figure 4.4 as an example only, is used to document chain-of-custody for waste obtained from a tank truck shipment. The chain-of-custody document ensures the ability to trace the possession and handling of samples from the time of initial sampling through analysis.

### 4.4 Waste Characterization, Methods, Rationale and Process Tolerance Limits

#### 4.4.1 Waste Characterization

In order to adequately characterize wastes prior to reclamation, a waste analysis will be conducted on a representative sample of the waste. The waste analysis required by LESB will include the following parameters:

April 20, 1992

RECEIVED  
APR 21 1992  
LAIDLAW

CERTIFIED MAIL #P 857 255 388  
RETURN RECEIPT REQUESTED

Ms. Lorraine G. Clark  
Florida Department of Environmental Regulation  
Bureau of Waste Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

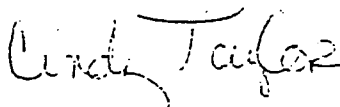
RE: Laidlaw Environmental Services of Bartow, Inc.  
Bartow, Florida  
EPA ID #FLD 980 729 610

Dear Ms. Clark:

Please find attached Amendment Number 2 to Letter of Credit Number 1475/S-00184, which is amended by Letter of Credit Number 1269/S00588, for the above referenced facility. This Letter of Credit reflects the 1992 inflation factor for closure/post closure care costs and also the facility's name change from Tricil Recovery Services, Inc. to Laidlaw Environmental Services of Bartow, Inc. All other terms and conditions of the Letter of Credit remain unchanged.

Should you have any questions, please contact me at (803) 798-2993.

Sincerely,



Cindy Taylor,  
Environmental Affairs Department

/ct

Attachment

cc: Lin Longshore  
Ashley Chadwick  
Steve Taylor  
Elaine Jenkins



ORIGINAL

PIERREFONT PLAZA  
300 CADMAN PLAZA WEST  
BROOKLYN, NEW YORK 11201-2701

DATE: 14SEP77

STAND-BY LETTER OF CREDIT NUMBER: 1475/80019A

EXPIRY DATE: 21SEP78

PLACE OF EXPIRY: AT OUR COUNTERS

## APPLICANT:

TRICIL RECOVERY SERVICES INC.  
ROUTE 3, BOX 249  
BARTOW MUNICIPAL AIRPORT  
AVENUE D NORTH  
BARTOW, FLORIDA 33830-9604

## BENEFICIARY:

SECRETARY  
BUREAU OF WASTE MANAGEMENT  
FLORIDA DEPARTMENT OF ENVIRONMENTAL  
REGULATION  
TWIN TOWERS OFFICE BUILDING  
2400 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8014  
GENTLEMEN.

## AMOUNT:

USD \*\*\*\*\*155,570.00  
ONE HUNDRED FIFTY FIVE THOUSAND  
EIGHT HUNDRED NINETY AND 00/100  
USD

THE ABOVE CREDIT IS AMENDED AS FOLLOWS:

- 1) CREDIT AMOUNT INCREASED BY USD 140.00 MAKING NEW TOTAL AMOUNT NOW ISSUED USD 155,710.00 (FIFTY FIVE THOUSAND ONE HUNDRED FIFTY FIVE THOUSAND EIGHT HUNDRED NINETY AND 00/100).
- 2) APPLICANT'S NAME IS AMENDED TO READ:

LAWLAW ENVIRONMENTAL SERVICES OF BARTOW INC.  
EPA ID# 990 772 410

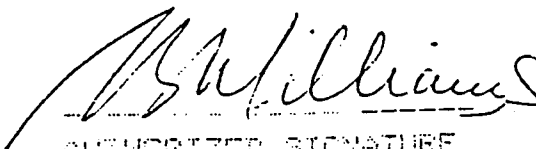
- 3) LETTER OF CREDIT NO. 1475/80019A IS AMENDED TO READ 1267/800588. PLEASE NOTE YOUR RECORDS AND MAKE REFERENCE TO LETTER OF CREDIT NO. 1267/800588 IN ALL FUTURE CORRESPONDENCE.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

IF THIS AMENDMENT IS NOT ACCEPTABLE TO YOU, PLEASE NOTIFY US WITHIN FIFTEEN (15) DAYS FROM DATE OF THIS AMENDMENT.

THIS AMENDMENT IS TO BE CONSIDERED AS PART OF THE ABOVE CREDIT AND MUST BE ATTACHED THERETO.

  
AUTHORIZED SIGNATURE

  
AUTHORIZED SIGNATURE

\* SEE NEXT PAGE \*



ROYAL BANK  
OF CANADA

ORIGINAL

CONTRIBUTION OF L/C REFERENCE 500500 01

THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR  
DOCUMENTARY CREDITS (1993 REVISION), INTERNATIONAL CHAMBER OF  
COMMERCE - PUBLICATION NO. 600.

  
AUTHORIZED SIGNATURE

  
AUTHORIZED SIGNATURE



# Florida Department of Environmental Regulation

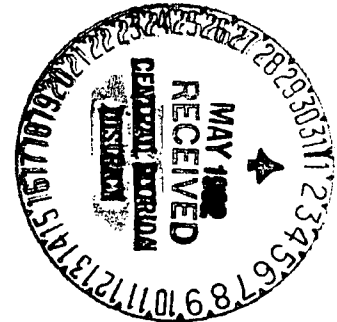
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 28, 1992

Ms. Cindy Taylor  
Environmental Affairs Department  
Laidlaw Environmental Services, Inc.  
Post Office Box 210799  
Columbia, South Carolina 29221



RE: Laidlaw Environmental Services of Bartow, Inc.  
Bartow, Florida  
FLD 980 729 610

Dear Ms. Taylor:

I have received your amendment 2 to Letter of Credit 1475/00184 which amends the amount, owner's name and number. Your increase of closure cost estimate to \$155,890 satisfies the requirement of 40 CFR Part 264.142 for adjusted care costs for inflation. Your next adjustment for inflation is due on August 27, 1993. I calculated this date by using subpart 264.142(d) which reads "...during the active life of the facility, the owner or operator must adjust the closure cost estimate for inflation within 60 days prior to the anniversary date [October 27] of the establishment of the financial instrument [standby trust fund agreement]."

If I can be of further assistance, I may be reached at 904/488-0300.

Sincerely,

*Lorraine G. Clark*

Lorraine G. Clark  
Environmental Specialist  
Hazardous Waste Regulation

LGC/mh

cc: Jeff Pallas, EPA, Atlanta  
Bob Snyder, DER, Orlando  
Doug Outlaw, DER, Tallahassee

D.E.R.

MAY - 8 1992

SOUTHWEST DISTRICT  
TAMPA

17.12. Reporting (264.1065) (60.487) (61.247)

If leaks from valves, pumps, and compressors are repaired as described in this chapter, and control devices do not exceed or operate outside of design specifications for more than 24 hours, a report to the Regional Administrator is not required.

If required, a semiannual report will be sent to the Regional Administrator, by the dates specified by the Regional Administrator, which will include the following information:

1. The EPA ID number, name, and address of the facility.
2. For each month during the reporting period, the ID number of each valve, pump, or compressor for which a leak was not repaired as required by Subpart BB.
3. Dates of hazardous waste unit shutdowns that occurred within the reporting period.
4. For each month during the reporting period, the dates when control devices exceeded or operated outside of the design specifications and were not corrected within 24 hours, the duration and cause of each exceedance, and any corrective measures taken.

17.13 Monitoring of equipment designated for no detectable emissions or difficult-to-monitor.

Equipment designated for no detectable emissions or as difficult-to-monitor shall be inspected visually on a monthly basis. Potential leaks will be recorded and repaired according to the provisions of this chapter. After repairs are completed, the equipment will be monitored immediately for leaks, and monthly thereafter until it can again meet the requirements for no detectable emissions.

Equipment designated for no detectable emissions or as difficult-to-monitor will be monitored at intervals not to exceed twelve months, providing that no leaks are detected.

0746A

## 40CFR264 SUBPART BB WEEKLY PUMP INSPECTION LOG

[illegible]

Figure 17.6 Weekly Pump Inspection Log



## 40CFR264 SUBPART BB EQUIPMENT DIFFICULT TO MONITOR

[illegible]

Figure 17.7 Equipment Difficult to Monitor Log

## 40CFR264 EQUIPMENT WITH NO DETECTABLE EMISSIONS

DATE: \_\_\_\_\_

FACILITY MANAGER SIGNATURE: \_\_\_\_\_

[illegible]

Figure 17.8 Equipment With No Detectable Emissions

# HAND-DELIVERY RECEIPT

Document: Request for Minor Modification of Permit # HO53-182726  
Laidlaw Environmental Services of Bartow, Inc.

Date Delivered: May 5, 1992

Delivered by: Steve Taylor

Received by: Watts P. C. Fred

Florida Department of Environmental Regulation

# Florida Department of Environmental Regulation

## NOTICE OF MEETING

Meeting Date 10/30/92, Time 9AM to Noon Place Waste Management Meeting Room

Case/Subject Laidlaw Environmental Services of Bartow

Requested by Ashley Chadwick Date 10/23/92 Phone (803) 798-2993

Purpose (check one or more): Give info ☐ Get info ☒ Problem solving ☒

### Topics to be discussed

Resolution of WL Violations  
Need for permit modifications  
Resolution of E penalty

### Anticipated DER meeting participants, title

Phone #

D1 Gary Sanft

D2 Beth Knauer

D3 Lynn Milanian

D4 Gilbert Dembeck

D5 \_\_\_\_\_

### Anticipated non-DER meeting participants, affiliation, title

Phone #

N1 Ashley Chadwick

N2 Paul Monik

N3 Jim Jerozal

N4 \_\_\_\_\_

N5 \_\_\_\_\_

### Information needed - responsibility (#)

Permit info D3

Warning Letter & Case File D4

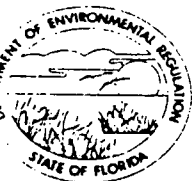
### Additional meeting notices to:

Bill Kutash

DER Mtg Coord. Gilbert Dembeck Extention 399 Mtg. Notice Date 10/23/92

Wed at 9:00 Nov 4, 1992

Meeting RCRA  
STAFF



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Satish Kastury  
Administrator, Tallahassee

THRU: *sl* Gary Santti, Professional Engineer II, Tampa  
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *lyne 10/27*

DATE: October 27, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610  
Operating Permit File No. HO53-182726  
Certification the Tank R - 203 is now Fit for Service

Attached are documents dated October 2, 1992 and submitted October 5, 1992 which are subject to the noted permit.

This package details:

1. One cover letter indicating that tank R - 203 is now functional .
2. One copy of the certifying engineer's report.

Also attached is the SW District's response to this report, please provide any comments you may have within thirty days.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV

lesbtran.doc

*2692*



# *Florida Department of Environmental Regulation*

**Southwest District**

Lawton Chiles, Governor

4520 Oak Fair Boulevard

813-620-6100

Tampa, Florida 33610-7347

Carol M. Browner, Secretary

October 15, 1992

Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Re: Laidlaw Environmental Services of Bartow, FLD 980 729 610  
Operating Permit File No. HO53-182726  
Status of Tank R-203

Dear Mr. Manak:

The Florida Department of Environmental Regulation (FDER) has reviewed the certification package prepared by Jammal & Associates indicating that repairs have been made to Tank R-203 and that testing of the unit verifies that it is safe for operation. The FDER requires the addressing of the following issues prior to accepting your certification statement.

**Issue 1.** The FDER requires that the tank be equipped with a pressure relief valve rather than a rupture disk. In the event of upset conditions, emissions from the rupture disk would continue unabated until maintenance could replace the device. However, if a relief valve were utilized, emissions would be minimal and the device is able to reset itself.

**Issue 2.** The engineer of record must provide assurances in the certification package that the tank can withstand the effects of the cycling events it will experience each time the tank is placed under pressure to remove sludges and each time the tank is placed under vacuum during transfer of waste to the tank.

Paul Manak  
Status of Tank R-203  
October 15, 1992

**Issue 3.** Examination of your current operating permit application indicated that Tank R-202 and Tank R-203 were to be operated under vacuum and that the tanks were not equipped with rupture disks. As such, Laidlaw has failed to receive a Class II modification for these tank units as described in 40 CFR Chapter 270.42 Appendix I Section G.2. to install rupture disks. The FDER, requires that Laidlaw submit the appropriate documents to reflect the modifications that were made to these two tanks along with the correct processing fee (\$10,000.00) and provide a public notice in a local newspaper of general circulation.

**Issue 4.** The FDER requires that a pressure relief valve be utilized for Tank R-202 rather than the rupture disk.

**Issue 5.** Revisions to your current operating permit application must be submitted to reflect narrative changes in all appropriate sections concerning provisions for inspection of the pressure relief valve on the tank inspection log, language changes to the application narrative and changes to the tank diagrams showing the pressure relief valve.

Please provide your written response to this notice within thirty days. Should you have any questions, please feel free to contact me at (813) 744-6100, extension 372.

Sincerely,



Lynne R. Milanian  
Permitting Engineer  
Hazardous Waste Program  
Division of Waste Management

lrm

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

lesb.doc



VIA CERTIFIED MAIL  
RECEIPT #P 809 530 368

D. E. R.

October 2, 1992

Florida Department of Environmental Regulation  
3804 Coconut Palms Drive  
Tampa, Florida 33619-8318  
Attention: Gil Dembeck, Hazardous Waste

OCT 5 1992

SOUTHWEST DISTRICT  
TAMPA

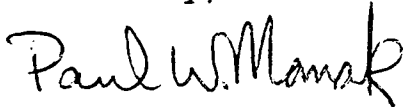
Re: Laidlaw Environmental Services of Bartow, Inc.  
FLD 980 729 610  
Hazardous Waste Operating Permit #H053-182726

Dear Mr. Dembeck:

On July 28, 1992 we notified you that tank R-203 was taken out of service due to a section of the wall being below minimum wall thickness of 0.3125" as specified per permit Specific Condition III.6. Subsequently, the section of the wall in question has been replaced with a 0.375" thick carbon steel plate. An independent professional engineer hydrostatically tested the tank on August 25, 1992 and found it fit for use. Additionally, a visual examination of the repaired area was completed on September 10, 1992 to further confirm the welding had been properly performed. Attached are records documenting repair and certifying testing. These records will be maintained at the facility, also.

In accordance with Specific Condition III.10, and US EPA regulation 40 CFR 264.196(e) and (f) all repairs have been completed and certified by an independent, qualified, registered professional engineer. This letter, therefore, will serve as notice of our intent to return tank R-203 to service upon approval by the Department. If you have any questions or concerns regarding this matter, please feel free to contact me.

Sincerely,



Paul W. Manak  
Facility Manager

attachments

cc: Compliance Manager  
Ashley Chadwick

100292GD.CL



**Professional Service Industries, Inc.**  
Jammal & Associates Division

September 15, 1992  
Project No. 759-20089

D. E. R.

OCT 25 1992

SOUTHWEST DISTRICT  
TAMPA

TO: Laid Law Environmental Services of Bartow  
170 Bartow Municipal Airport  
Bartow, Florida 33830

Attention: Mr. Paul Manak

SUBJECT: Inspection and Testing of Tank #R203

Dear Mr. Allen:

As per the request from Laid Law Environmental Services of Bartow, PSI/Jammal & Associates Division performed the following inspections and tests on Tank #R203.

<u>Date (1992)</u>	<u>Inspection/Test</u>	<u>Results</u>
7-22	Base line ultrasonic testing for minimum wall thickness (Thickness of .3125 established by Laid Law Environmental Services of Bartow.	1 (one) area recorded with wall readings below .3125 (see attached report)
7-23	Additional thickness readings in area of previous reported area below .3125 (see attached report)	Established area to be approximately 36"x18" on south side of Tank #R-203.
8-25	Hydrostatic test of Tank #R203 per ASME Boiler & Pressure Vessel Code Sect VIII 1989 Edition Para. (UG-99). Operating pressure established by Laid Law Environmental Services of Bartow at 25 P.S.I. Test pressure 37.5 P.S.I.	No evidence of leakage or reduced gauge pressure see attached report of (8-8-92)

<u>Date (1992)</u>	<u>Inspection/Test</u>	<u>Results</u>
9-10	Visual examination of repaired area on Tank #R203.	Satisfactory per ASME Sect IX (see attached report dated 9-10-92).
9-10	Review of weld repair, data sheet and welder qualification records (see attached repair report dated 8-28-92 and qualification record).	Satisfactory.

Hydrostatic test was performed on August 25, 1992 per ASME Boiler and Pressure Vessel Code Section VIII 1989 Edition Para U.G-99 on Tank #R203 after repair was made by Keller and Associates, Inc. to determine integrity of tank and repaired area. No evidence of leakage or reduced gauge pressure was observed, repaired area was re-inspected after hydrostatic (see report dated September 10, 1992) with no indications found. Based on inspections and tests, Tank #R-203 is capable of operating at 25 P.S.I.G.

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 gather and evaluate 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.

PSI/Jammal division certify that the above inspection and test results were performed by qualified and certified inspection personnel to PSI's QA/NDE program.

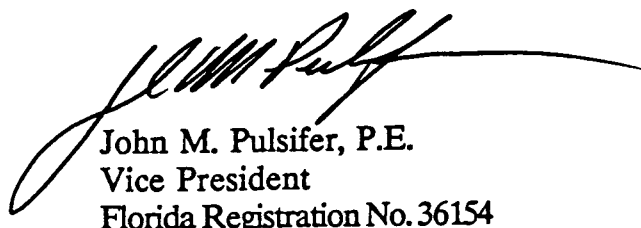
If we can be of further assistance, please do not hesitate to contact me at 407-645-5527.

Very truly yours,

PSI/JAMMAL & ASSOCIATES DIVISION



Ken Shaw  
Department Manager



John M. Pulsifer, P.E.  
Vice President  
Florida Registration No. 36154

bap1258





**Professional Service Industries, Inc.**  
Jammal & Associates Division

July 29, 1992

Laid Law Environmental Services of Bartow  
170 Bartow Municipal Airport  
Bartow, Florida 33830

Attention: Mr. Bart Allen

Re: Inspection of Hazardous Waste Storage Tanks #R-2 & R-3  
Bartow Florida - Project No. 759-20089

Dear Mr. Allen:

Enclosed is our inspection report of Laid Law tanks #R-2 and R-3 in Bartow, Florida, including drawings and photographs. This inspection was performed on July 21, 1992. A total of two PSI representatives performed the inspection.

The tank is 10 feet I.D. diameter x 10 feet high with 2'4" dished top and bottom heads. Exterior of tank is insulated.

The following summarizes our findings:

Visual inspection of interior surfaces:

1. A heavy rust scale noted on manway
2. Although there was no interior rust on vessel walls, there were scattered pits.
3. Vessel walls were covered with a varying coating of sludge. Sludge thickness varied from approximately 1/4 inch thick at the top of bare metal at the bottom.

4. Visual inspection of the welds revealed no cracks or other discrepancies  
Thickness measurements.
1. With the exception of the .293 inches reading 9 - south there were no readings  
below .3125 inches.

See drawing and field report for actual thickness readings.

If we can be of further service or should you have any questions regarding this report, please  
contact our office.

Very truly yours,

PSI/JAMMAL & ASSOCIATES DIVISION



Ken Shaw  
Department Manager

bap1104



CLIENT Laidlaw EnvironmentalDATE JULY 21, 1992

PROJECT NAME \_\_\_\_\_

PROJECT NO. 759-20089

WEATHER \_\_\_\_\_

ON SITE TIME 12.5FIELD CONTACT LARRY BECKER

TRAVEL TIME \_\_\_\_\_

## SCOPE OF FIELDWORK \_\_\_\_\_

TANK THICKNESS MEASUREMENTS  
AND VISUAL WELD INSPECTION

## Record of Field Observations and Tests:

AS REQUESTED, CONDUCTED VOLUMETRIC ULTRASONIC COMPRESSION WAVE N.D.T. TO DETERMINE WALL THICKNESS VALUES OF TANKS "R3" + "R2". (04) TEST SITES WERE ESTABLISHED IN EACH TANK, AFTER MANUAL RUST/SLUDGE REMOVAL, A D-METER WAS UTILIZED TO DETERMINE THICKNESSES IN THESE AREAS. (SEE ATTACHED SKETCH SHEET FOR TEST LOCATION ORIENTATION AND THICKNESS VALUES)

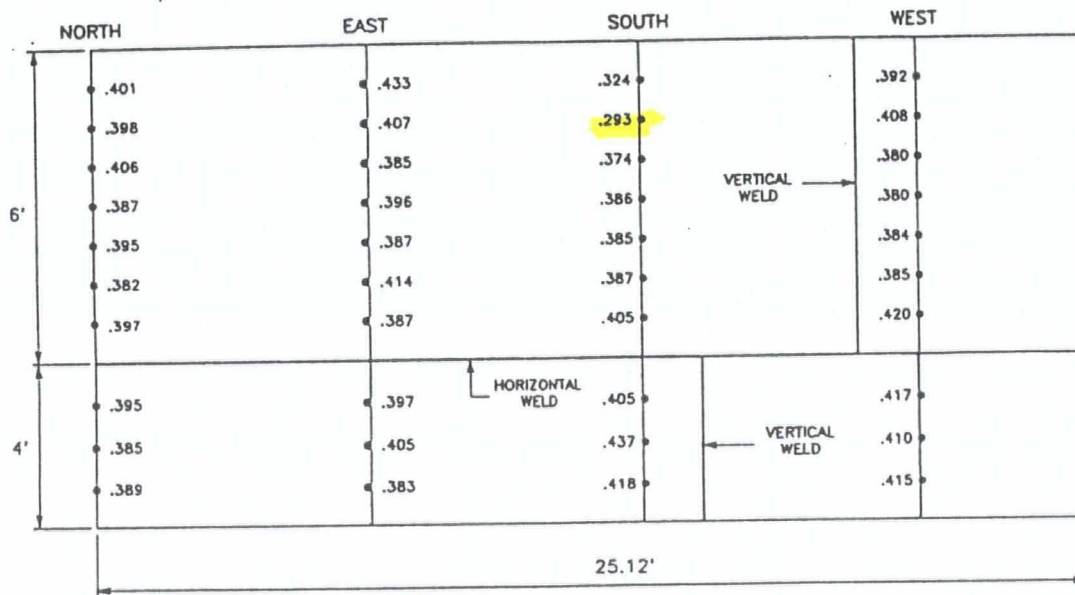
\* SURFACES TOO UNEVEN FOR TESTING \*

TANK R3	SOUTH	EAST	WEST	NORTH	TANK R2	SOUTH	EAST	WEST	NORTH
① →	.418"	.383"	.415"	.389"	① →	.387"	.431"	.377"	.398"
② →	.437"	.405"	.410"	.385"	② →	.394"	.419"	.387"	.421"
③ →	.405"	.397"	.417"	.395"	③ →	.375"	.386"	.403"	.414"
④ →	.405"	.387"	.420"	.397"	④ →	.364"	.435"	.413"	.328"
⑤ →	.367"	.414"	.385"	.382"	⑤ →	.360"	.387"	.406"	.437"
⑥ →	.365"	.387"	.384"	.395"	⑥ →	.370"	.381"	.398"	.394"
⑦ →	.386"	.396"	.380"	.387"	⑦ →	.373"	.361"	.384"	.395"
⑧ →	.374"	.385"	.380"	.406"	⑧ →	.369"	.322"	.391"	.366"
⑨ →	.293"	.407"	.408"	.398"	⑨ →	.347"	.336"	.402"	.365"
⑩ →	.324"	.433"	.392"	.401"	⑩ →	.323"	.355"	.397"	.362"
BOTTOM CAP N-S ① ② ③ ④ ⑤ ⑥					BOTTOM CAP N-S ① ② ③ ④ ⑤ ⑥				
	.435" .375" .375" .392" .395" .437"					.403" .365" .357" .354" .382" .402"			
BOTTOM CAP E-W .417" .408" .415" .385" .387" .420"					BOTTOM CAP E-W .398" .367" .364" .362" .355" .373"				
* TOP CAP S-N = .504" * E-W = .509" * *					* TOP CAP WEST = .502" * * .318" * .398" *				

Technician: Michael A. JanCopies to: L. BECKER / PSI-JAMMAL

## FIELD REPORT RECORD

Professional Service Industries, Inc.  
Jammal & Associates Division

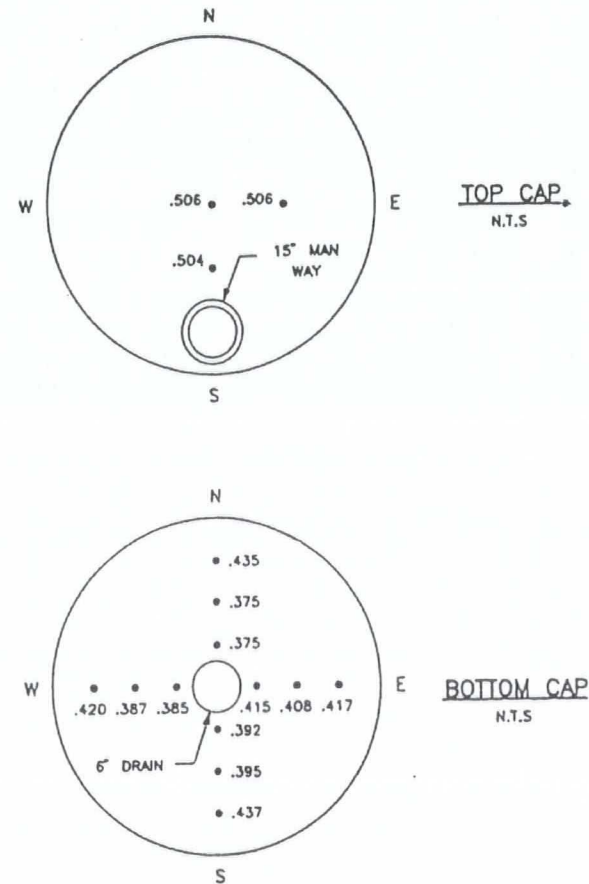


STORAGE TANK No. R203  
N.T.S.

### LEGEND

.386 • ULTRASONIC THICKNESS VALUE IN INCHES

NOTE: READINGS RECORDED APPROXIMATELY ON 9" INTERVALS



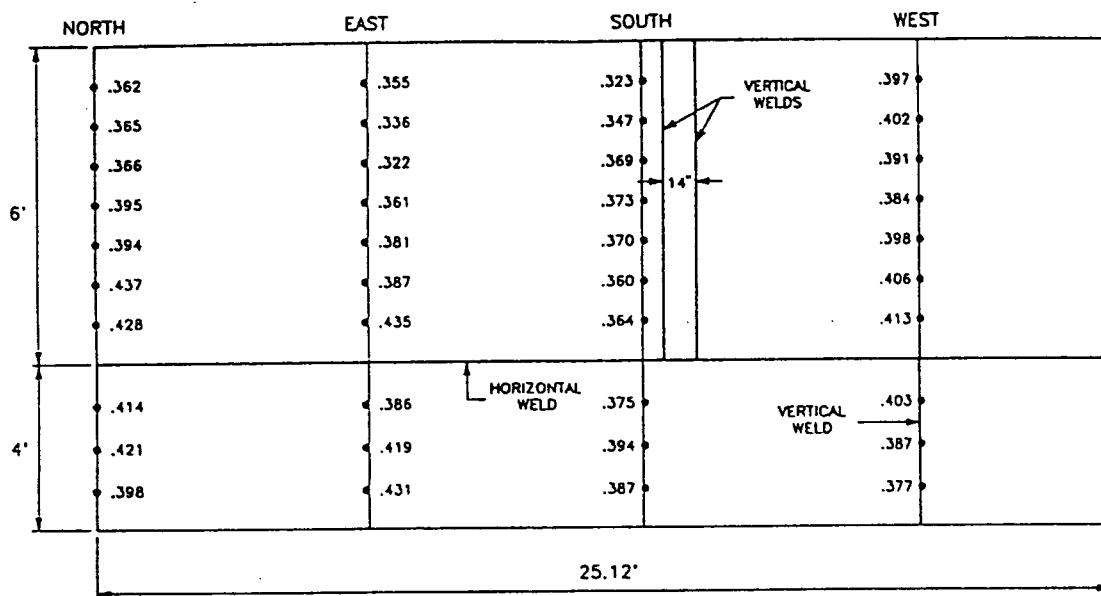
DESIGNED BY	MG
CHECKED BY	KRS
APPROVED BY	RW
DATE	NOTED

ULTRASONIC THICKNESS READINGS  
LAIDLAW ENVIRONMENTAL  
SERVICES OF BARTOW  
BARTOW, FLORIDA



Jammal & Associates, Inc.  
A Division of Professional Service Industries, Inc.

DATE	7-22-92	PROJECT NO.	759-20089	SHEET	2 of 2
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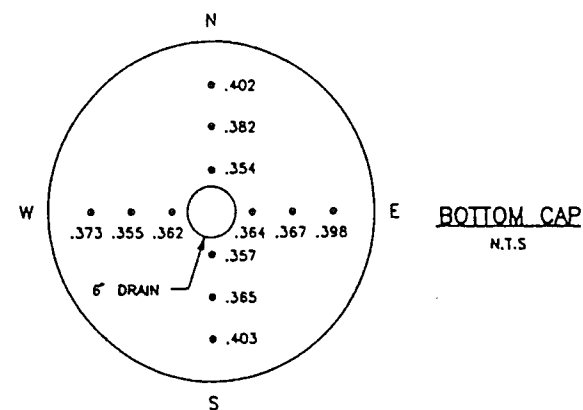
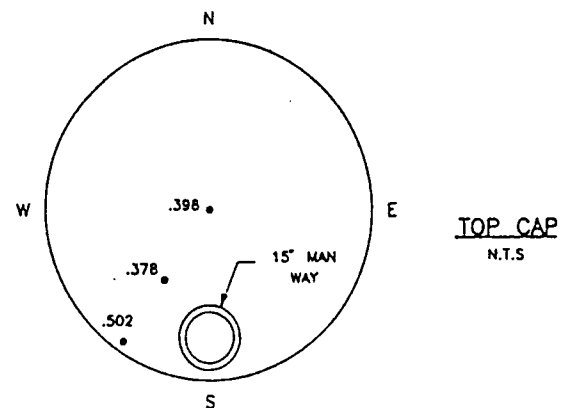


STORAGE TANK No. R202  
N.T.S.

LEGEND

.386 • ULTRASONIC THICKNESS VALUE IN INCHES

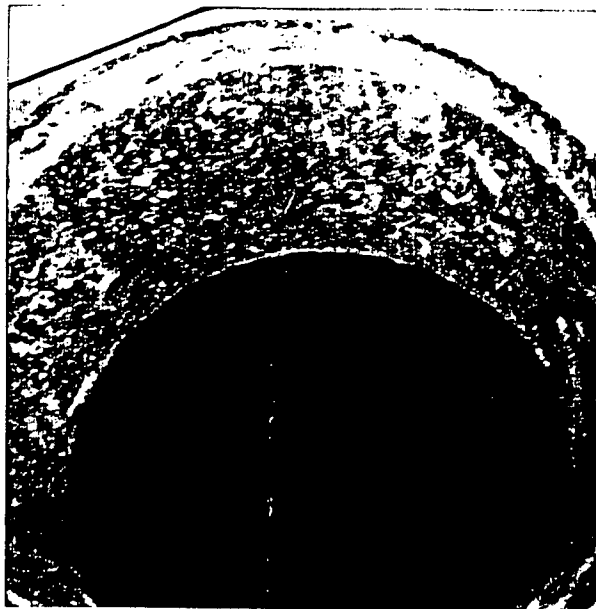
NOTE: READINGS RECORDED APPROXIMATELY ON 9" INTERVALS



DESIGN	MG
CHECKED	KRS
APPROVED	RW
SCALE	NOTED

ULTRASONIC THICKNESS READINGS LAIDLAW ENVIRONMENTAL SERVICES OF BARTOW BARTOW, FLORIDA		
Jammal & Associates, Inc. A Division of Professional Service Industries, Inc.		
DATE 7-22-92	PROJECT NO. 759-20089	SHEET 1 of 2

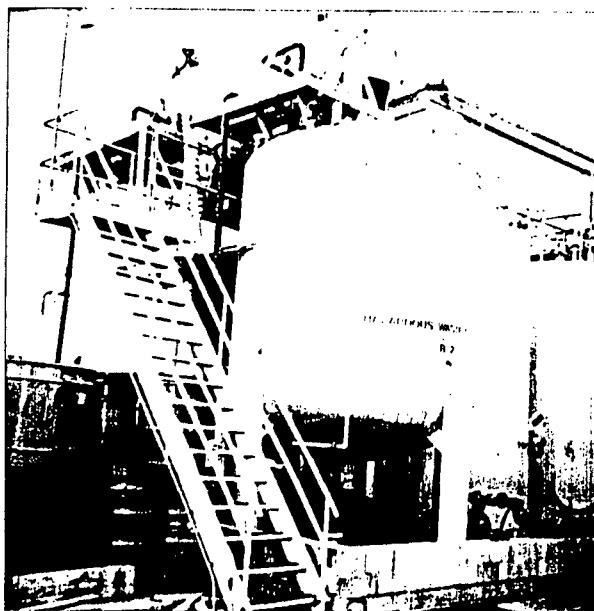




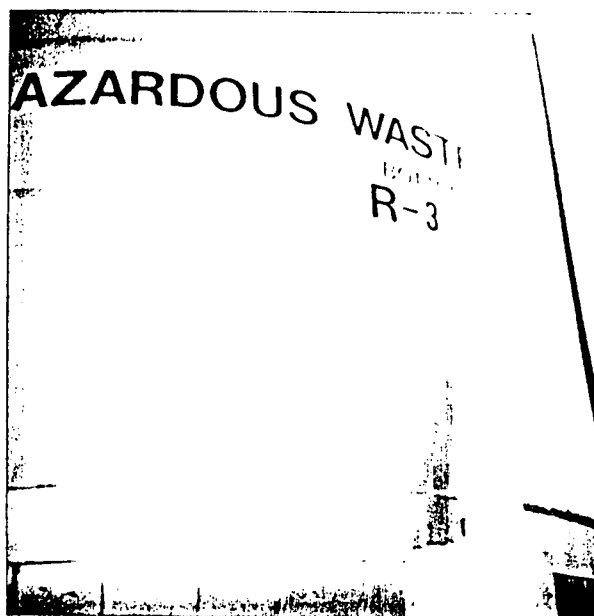
Corrosion @ Entry Hole Tank R-3



Corrosion @ Entry of Tank R-2



Outside View of Tank R-2



Outside View of Tank R-3

CLIENT Laidlaw Environmental Services DATE 7-23-92  
PROJECT NAME BARTON - TANK # R-3 PROJECT NO. 759-20089  
WEATHER SCAR  
ON SITE TIME \_\_\_\_\_  
FIELD CONTACT LARRY BECKER TRAVEL TIME \_\_\_\_\_

SCOPE OF FIELDWORK ULTRASONIC Thickness Readings

Record of Field Observations and Tests:

As requested by the client a visit was made to the job site to take additional thickness readings at an area previously tested and found to have a unusually low reading of .293".

The surrounding area was cleared and several readings were taken within approx. 3' to 4' radi. these readings ranged from .406" to .216".

Due to some heavy pitting in this localized area, readings were unobtainable due to the uneven surface.

See attached drawing for locations and results.

Technician: REX W. DIGHT

Copies to: \_\_\_\_\_

FIELD REPORT RECORD



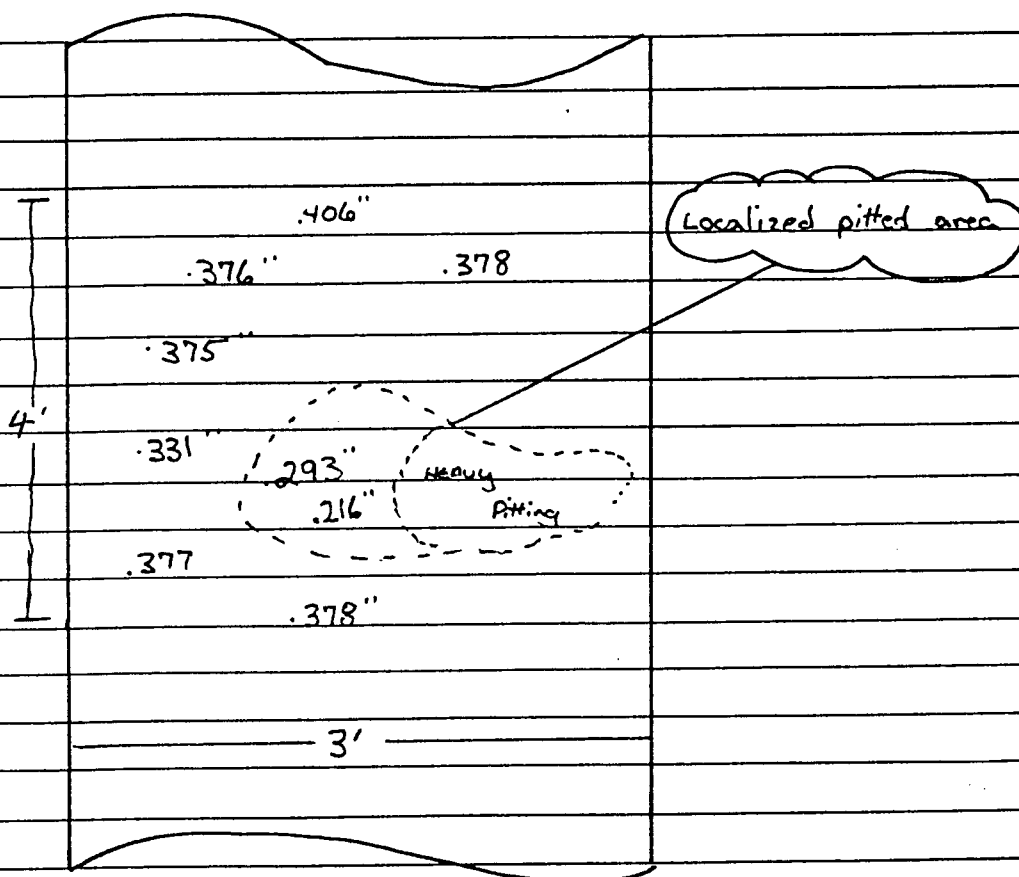
**Jammal & Associates, Inc.**  
A Division of Professional Service Industries, Inc.

CLIENT LAINCOW ENV. Page 2 of 2 DATE 7-23-92  
PROJECT NAME BARTONS TANK R-3 PROJECT NO. 759-20089  
WEATHER \_\_\_\_\_  
ON SITE TIME \_\_\_\_\_  
FIELD CONTACT LARRY Becker TRAVEL TIME \_\_\_\_\_

SCOPE OF FIELDWORK ultrasonic thickness testing

Record of Field Observations and Tests:

South side of tank R-3 3' to 4' below manhole



Technician: REX WRIGHT

Copies to: \_\_\_\_\_

FIELD REPORT RECORD



**Jammal & Associates, Inc.**  
A Division of Professional Service Industries, Inc.

# KELLER & ASSOCIATES, INC.

STATE CERTIFIED POLLUTANT STORAGE SYSTEMS CONTRACTORS  
STATE CERTIFIED MECHANICAL CONTRACTORS

2810 Security Lane  
Lakeland, Florida 33803  
(813) 665-9229  
WATS 1-800-522-1162  
FAX (813) 665-4851

RECEIVED

AUG 31 1992

L AIDLAW

Laidlaw Environmental  
170 Bartow Municipal Airport  
Bartow, FL 33830

Attn: Paul Manak

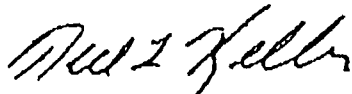
Dear Paul:

As directed by Bart Allen, we performed the following repairs on Tank R-203, on August 5, 1992.

1. Remove 36" x 18" eroded piece from inner shell.
2. Install new 36" x 18" X 3/8" piece with back up strips for welding.
3. See attached welding certs for Troy Weeks, the welder who performed welding.

Should you require any further information, please do not hesitate to call.

Sincerely,



Ted L. Keller  
President

TLK/jgj

WELDER NAME CHARLES T WEEKS #3 STAMPWELDING PROCEDURE SPECIFICATION NO(S): SM-1-B

VARIABLE	RECORD ACTUAL VALUES USED IN QUALIFICATION	QUALIFICATION RANGE
PROCESS:	<u>SMW</u>	<u>SMW</u>
Process Type	<u>MANUAL</u>	<u>MANUAL</u>
Welding (QW-402)	<u>WELD METAL</u>	<u>BACHING</u>
Material Spec. (QW-403)	<u>SA 56 TO SA 36</u>	<u>P1 TO P11</u>
THICKNESS:		
Groove	<u>1"</u>	<u>MAX TO 8" WELDED</u>
Fillet	<u>-</u>	<u>ALL</u>
METER:		
Groove	<u>-</u>	<u>2 1/2 OD UP</u>
Fillet	<u>-</u>	<u>ALL</u>
WELDER METAL QW-404	<u>SFA 5.1</u>	<u>SFA 5.1</u>
C. No.	<u>E 7018</u>	<u>SFA 5.1</u>
Class	<u>F-4</u>	<u>F4 AND BLOW</u>
Position	<u>H6</u>	<u>O, F</u>
Weld Progression (QW-410)	<u>-</u>	<u>-</u>
Weld Type (QW-408)	<u>-</u>	<u>-</u>
Electrical Characteristics (QW-409)	<u>-</u>	<u>-</u>
Current	<u>DC</u>	<u>DC</u>
Polarity	<u>REVERSED</u>	<u>REVERSED</u>

Guided Bend Test Results QW-462.2(a), QW-462.3(a), QW-462.3(b)  
Type and Figure Number Result

SIDE	QW 462.2	SATISFACTORY
SIDE	QW 462.2	SATISFACTORY

Radiographic Test Results (QW-304 &amp; QW-305)

For alternative qualification of groove welds by radiography

Radiographic Results:

Fracture Test (See QW-462.4(a), QW-462.4(b))  
Describe the location, nature and size of any crack or tearing  
the specimen:Length and Percent of Defects \_\_\_\_\_ Inches  
Macro Test-Fusion \_\_\_\_\_  
Appearance-Fillet Size (leg) \_\_\_\_\_ in. X \_\_\_\_\_ in. Convexity \_\_\_\_\_ in. or Concavity \_\_\_\_\_TEST CONDUCTED BY: HULLER AND ASSOCIATES LABORATORY TEST NO. \_\_\_\_\_

We certify that the statements in this record are correct and that the test was prepared, welded and tested in accordance with the requirements of Section 9 of the ASME Code.

ORGANIZATION HULLER AND ASSOCIATESBY: Mark KellerTITLE: QW-1 QCM



**Professional Service Industries, Inc.**  
Jammal & Associates Division

August 25, 1992  
Project No. 759-20089

TO: Laid Law Environmental Services of Bartow  
170 Bartow Municipal Airport  
Bartow, Florida 33830

Attention: Mr. Bart Allen

SUBJECT: Hydrostatic Test of Tank # R203

---

Dear Mr. Allen:

Hydrostatic test was performed on Laid Law Tank Number R203. Tank was filled with service water ambient temperature and pressurized to 37.5 PSI (1-1/2 x operating pressure of 25 PSI established by Laid Law).

Pressure was held for a 15 minute time frame. Inspection was performed on 100% of tank and connections with no evidence of leakage or loss of pressure from in line test gauge.

Test Conditions:

Temperature - Ambient

Operating Pressure - 25 psi established by Laid law

Test Pressure - 1-1/2 x operating Pressure - 37.5 PSI per ASME Boiler & Pressure Vessel - 1989 Edition Division I, Paragraph U G - 99 - Standard Hydrostatic Test

Test Gauge - Silicone filled, 0 - 600 PSI Rice in line Pressure Gauge

Laid Law Environmental Services of Bartow  
Project No. 759-20089

-2-

Tank Dimensions - 14'8" high x 10' diameter x .335 average wall, welded steel plate

Level II Inspector - Kenny Stringer - Helper Sam Smith

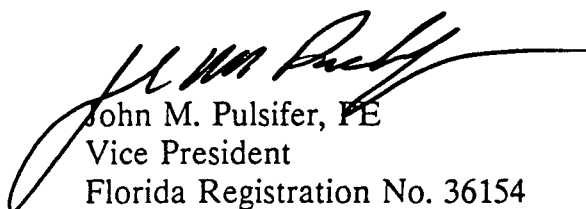
Very truly yours,

PSI/JAMMAL & ASSOCIATES DIVISION



Ken Shaw  
Department Manager

bap1198



John M. Pulsifer, PE  
Vice President  
Florida Registration No. 36154





CLIENT L. AIDCLOW ENV.DATE 9.10.92PROJECT NAME Bartow tank # R.3PROJECT NO. 759-20089

WEATHER \_\_\_\_\_

ON SITE TIME \_\_\_\_\_

FIELD CONTACT Larry Becker

TRAVEL TIME \_\_\_\_\_

SCOPE OF FIELDWORK visual weld insp.

## Record of Field Observations and Tests:

As requested a visit was made to the Bartow plant to visually examine the repair patch made on the south side of tank # R.3. (36" x 18" x 3/8") piece of carbon steel <sup>R</sup> was full penetration welded in the area of interest.

Visually the welded area appeared to meet the job quality requirements set forth by ASME sec. IX  
No discrepancies found.

Attached under qual. report along with a photograph of the repaired area.

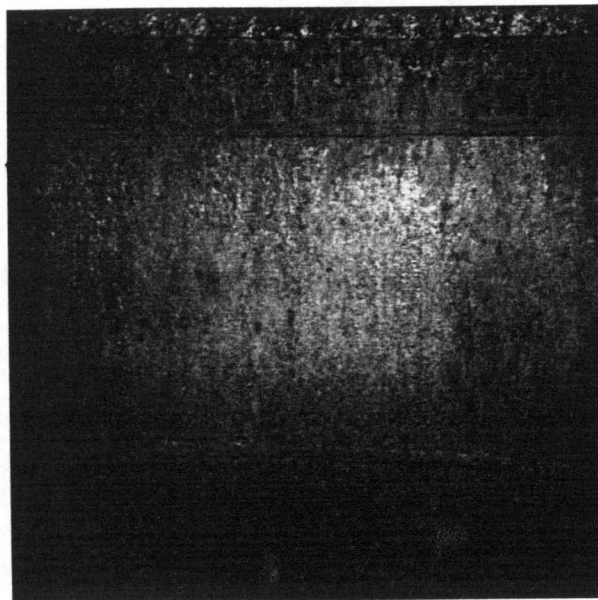
Technician: [Signature]

Copies to: \_\_\_\_\_

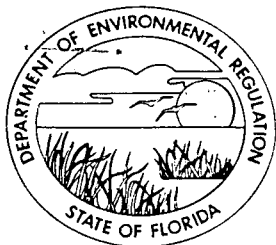
## FIELD REPORT RECORD



**Jammal & Associates, Inc.**  
A Division of Professional Service Industries, Inc.



REPAIR OF TANK #R203



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

SEP 21 1992

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Laidlaw Environmental Services of Bartow  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Attn: Paul Manak

Re: Warning Letter #WL92-0048HW53SWD  
FLD 980 729 610

Dear Mr. Manak:

In an attempt to clarify the issues discussed at the meeting between the Department and Laidlaw Environmental Services of Bartow (LESB) on July 22, 1992, and in response to LESB letter of July 31, 1992, we submit the following:

1. Regarding the process description corrections - The Department acknowledges that the empty crushed paint cans are sent to a landfill and not disposed of as scrap metal.

Regarding your reasoning for why monitoring was not done on the pumps - Use of 40 CFR 264.1057(f) does not apply, since this refers to standards for valves in gas/vapor service or in light liquid service only. 40 CFR 264.1053(a)(1) requires monthly monitoring of pumps using a properly calibrated detection instrument.

Regarding the damaged expansion joint seal - If it had been snagged by a forklift, it indicates that the forklift was not being operated properly. Forks should be raised off the ground while driven down the road. The Department acknowledges that materials deteriorate and require repair. Failure to note such deterioration in your inspection records is a violation of your inspection plan.

2. Regarding violation of 40 CFR 262.20(a) cited in the Summary of Violations, the description of the violation was inadvertently omitted from the process description. It should have been included as follows:

2392

Manifest #03346 (see Attachment I) was not properly prepared in that the transporter's company name, U.S. EPA ID number, and transporter's phone number were not included on the manifest for material which was signed for and removed from the facility on May 15, 1992 by an unknown transporter. The original return copy of the manifest was date stamped received by LESB, on May 26, 1992. Laidlaw Environmental Services (TS), Inc. of Clearwater, Florida, the designated facility, had returned this manifest unsigned, not certifying receipt. LESB filed this manifest without further inquiry. This deficiency was brought to the attention of Martha Hamilton, who maintains these records, during the June 4, 1992 inspection. Subsequently, LESB provided a corrected copy of this manifest to the Department (see Attachment II).

3. Regarding violation of 40 CFR 262.34(a)(3) cited in the Summary of Violations. The pail of contaminated sampling tubes was listed as a "10 gallon pail". It should have read "5 gallon pail".

In order to determine whether T-301 contained material in process or hazardous waste, the Department requests LESB to provide copies of tank inventory records, copies of all waste analysis performed on the contents of T-301, and copies of the operating record showing all material added to and removed from T-301 for the period of time from December 10, 1991 to May 5, 1992. *Don't have records balance inventory for all tanks regularly basis that would show how much waste received to waste tank, how much sent to still*

4. The Department agrees to delete violation 40 CFR 264.14(a) cited in the Summary of Violations. *how much recovered how much returned to recycle.*
5. The citation of 40 CFR 264.15(a) does refer just to the open holes in the five emergency pressure relief valves on the hazardous waste storage tanks, but also to the leaking valve on the freon wash system and the leaking valve on the vacuum still vacuum pump. Releases of hazardous waste constituents were occurring, but could have been prevented if adequate inspection had been performed as required. It is hard to believe that all five emergency tank vent valves were broken on the same day.
6. The citation of 40 CFR 264.15(c) applies because without this device you are unable to comply with inspection requirements under Subpart BB regulations for pumps which require monthly monitoring with a detection instrument, thus also preventing compliance with general inspection requirements to detect deterioration which may cause release of hazardous waste constituents.

7. The citation of 40 CFR 264.52(c), the review and approval of a contingency plan by the Department does not relieve the permittee from the responsibility of informing responders of facility name change or change of address to ensure proper response in an emergency. No description of arrangements with LESB at 170 Bartow Municipal Airport existed in the contingency plan.
8. 40 FR 264.52(e) requires amendment when the list of emergency equipment changes. This is not just for the information of employees, but also of outside responders who might have to rely on information provided in the contingency plan as to location of fire extinguishers.
9. On consultation with Tallahassee on the citation of the transfer facility requirements, they agree that the contingency plan and closure plan must specifically address the transfer facility operations and that a separate record must be maintained for all hazardous waste entering and leaving the transfer facility. The transfer facility operation records new rule was effective September 10, 1991. You did not submit any documentation that the Department had affirmatively accepted your contingency and closure plans as adequate for transfer facility operations. A finding of "no other violations were noted" does not mean that the facility is in compliance.
10. The modification of R-202 and R-203 contrary to what was installed as original equipment and the operation of these tanks in an other than approved manner is in direct violation of the permit. Pressurizing these tanks could significantly increase the possibility of a release as evidenced by the fact that a rupture disc had already ruptured on R-203. The tank wall thickness assessment information provided to the Department by LESB in your letter of July 28, 1992, further emphasizes the hazards possible in operating R-203 tank under pressure due to the excess corrosion that has been detected.
- 11.a. Regarding violation of General Permit Condition #6. - Failure to keep one storage tank available at all times, so it can provide emergency storage capacity for spills and emergencies in the plant. If LESB can provide records documenting that at least one empty tank was available in the fuel blending area at all times during the 44 days noted in the inspection report, this violation will be deleted.

- b. The citation of 40 CFR 264.1035(b)(2)(i) refers specifically to the requirements of identifying and locating on facility lot plan all process vents. This has not been done and the records the facility stated they would keep according to Chapter 16 of the permit application have not been kept in the format described. The Department would be interested in identifying the outside consultants who do not consider your water wash system to be solvent extraction. Your response does not indicate whether this violation has been corrected.
- c. The citations of 40 CFR 1054(a) and 264.1064(g)(3) concern Subpart BB only and not Subpart AA. They do not address tanks or tank vents, but specifically pressure relief valves which are regulated under Subpart BB. See FR 25455, third column.
- 12. The citation of violation of General Condition 8. of the permit is cited because of the numerous violations of permit conditions detected during the inspection. The conditions agreed to with the submittal of a permit application make many of the requirements to be of a self policing nature and the out of compliance reporting requirement allows the facility to correct the problem without having to suffer a penalty for non-compliance.
- 13. The citation of violation of Specific Condition I.2 was based on employee statements, statements in the permit application, and what the facility is now referring to as draft sampling procedure. If this is only a draft sampling procedure, what documented procedure was in use prior to the inspection? Please provide documentation of this procedure. 40 CFR 264.13(b)(3) specifies minimum standards for sampling procedures, which do not include the use of dirty sampling equipment.
- 14.a. 40 CFR 264.31 was cited for the 5 emergency pressure relief valves because with the missing bolts and weights, they were totally incapable of functioning for their designed purpose due to misuse and abuse which caused such deterioration. The fact that you state that all 10 valves needed repair also emphasizes that the design, construction and maintenance of these valves is deficient and in need of review. The release of hazardous waste constituents to the air from the five bolt holes is not the only issue of concern. Fire and explosion are also definite possibilities because these openings offer no protection since they are not protected by flame arresters.

- b. The leaking from valve (D-98V) was very evident during the inspection as it was actively dripping even though nothing was flowing through the attached line at the time. The leak was from liquid accumulated in the strainer body above the valve and it is quite possible that by the time your maintenance people checked it that it had completely drained out. Please provide repair record and monthly monitoring records to show that no further leakage has occurred. Since the quantity of waste released prior to discovery has not been determined, it is equally difficult for the facility to determine that the waste released does not constitute a threat to human health or the environment. The burden for proper operation and maintenance remains on the facility.
- c. Leak standards for vacuum pumps are covered by 40 CFR 264.1053 and the seal water system (barrier fluid) is specifically addressed in 40 CFR 264.1053(b)(3), which states that barrier fluid (seal water) must be purged into a hazardous waste stream. Since the barrier fluid is in direct contact with the hazardous waste vapors, any release would contain hazardous waste constituents.
- d. The driveway joint seal in question was discussed in paragraph #1. The Department still considers the damage to this seal to be the result of poor operations but is willing to decrease the assessment of penalty for this violation to the bottom of the matrix.
- 15. The Department is willing to combine the citation of Specific Condition I.8. with the citation of 40 CFR 264.52(e) and consider this as a single violation. See paragraph #8.
- 16. The violation of exceeding the maximum linear row of 11 pallets per row was inadvertently listed as a violation of Specific Condition II.3 of the permit. It should have read Specific Condition II.2. The citation from the inspection of November 26 and 27, 1991 and the Department response of May 27, 1992, deal with an entirely different issue, which was the storage of hazardous waste on the other side of the containment trench. An examination of Department files revealed no formal permit modification request or record of payment of the \$250 processing fee. Until such a permit modification request is received and approved, storage of more than 11 pallets in a linear row constitutes a permit violation.

SEP 21 1992

Page Six

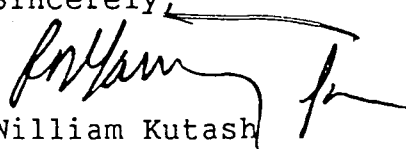
- 17.a. Regarding the citation of 40 CFR 264.173(a) for the pail of contaminated colliwassa tube - This second citation was for storage of hazardous waste in an open container. The first citation was different. It was for failure to label the pail as a hazardous waste container.
- b. Regarding the drum dropped by the forklift - The damaged drum and cleanup activity was witnessed by the inspector. Please provide records of all drums overpacked from 8:00 a.m. to 4:00 p.m. on June 10, 1992 and the reason they were overpacked. Realizing the dropping of the drum was accidental and not a deliberate action, the Department is willing to decrease the assessment of penalty for this violation to the bottom of the matrix.
18. Regarding the storage of hazardous waste in tanks other than T-101 to T-110 and R-202 or R-203. See paragraph #3.
19. Regarding the annual wall thickness testing and reporting - The report filing requirement was not met when the results of the January 7, 1992 testing was done. This is clearly a violation since minimum wall thicknesses and reporting requirement are spelled out in the permit. The facility, if it had a challenge to make to these permit conditions, had adequate time to make such a protest.

When LESB provides all the requested information, the issues which this information concerns will be reviewed by the Department and a decision made regarding the amount of the final penalty assessment. In the meantime, LESB is requested to provide their offer in settlement of the assessed penalties.

In addition, those issues which involve permit modifications must be promptly submitted to the Department for review and approval.

The Department seeks prompt resolution of this enforcement action but cannot draft a consent order until all issues have been addressed.

Sincerely,

  
William Kutash  
Administrator  
Division of Waste Management

WK/gdr

cc: Satish Kastury, BWP&R  
Alan Farmer, USEPA/Region IV  
Gary Maier, DER Air Permitting



# ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

## INFORMATION

Review &amp; Return

Review &amp; File

Initial &amp; Forward

## DISPOSITION

Review &amp; Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate &amp; Report

Initial &amp; Forward

Distribute

Concurrence

For Processing

Initial &amp; Return

FROM:

DATE

PHONE

will proposed  
modifications  
comply with  
current standards

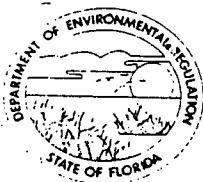
discuss this

issue along

w/ Alberto Tan R

lynn

Sept 11, 1992



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Satish Kastury  
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa *KS*  
Hazardous Waste Regulation *for*

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *lyne 9/8*

DATE: September 8, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610  
Construction Permit Application HC53-170970  
Request to Extend Permit

Attached are documents dated August 25, 1992 and submitted August 26, 1992 which are subject to the construction application.

This package details:

1. One cover letter requesting an extension of the expiration date of the construction permit to at least two years.

As you know, Laidlaw has not begun any construction activities to date and the department's enforcement section has several violations pending based on the last inspection. Approval of this request will no doubt be based on compliance with the alleged violations. Please provide any comments you may have within 2 weeks.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV  
*Beth Knapp, Enforcement, FDER - TAMPA*  
lesbtran.doc

*2292*

Via Certified Mail  
Receipt #P 809 530 360

D.E.R.

AUG 25 1992

SOUTHWEST DISTRICT  
TAMPA

August 25, 1992

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, FL 33610-7347  
Attention: Lynne Milanian, Permitting Engineer

Re: Laidlaw Environmental Services of Bartow, Inc., FLD980729610  
Hazardous Waste Facility Construction Permit #HC53-170970

Dear Mrs. Milanian;

With this letter, Laidlaw Environmental Services of Bartow, Inc., is requesting an extension of the referenced construction permit for two years. This extension is requested in part because the permit was only issued for one year, even though the construction plan submitted with the application outlined a two-year time schedule. Also, additional time is needed to evaluate market needs and related demands on the facility which will determine the scope and schedule of construction.

If you have any questions, please contact Steve Taylor or me at this facility.

Sincerely,

*Paul W. Manak*

Paul W. Manak  
Facility Manager

cc: Steve Taylor  
Ashley Chadwick  
Lin Longshore

VIA CERTIFIED MAIL  
RECEIPT NO. P809 530 366

September 9, 1992

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Gary Santti, Hazardous Waste Manager

Re: Laidlaw Environmental Services of Bartow, FLD 980729610  
Operation of a Hazardous Waste Storage and Fuel Blending  
Facility, Permit No. H053-182726

Dear Mr. Santti:

In accordance with Specific Conditions in the above-referenced permit we submit the following:

Part I. General

8. The facility contingency plan has been updated and distributed to the appropriate agencies. We submit the enclosed pages and request a minor amendment to the permit to replace outdated pages.

If you have any questions, please feel free to contact me.

Sincerely,

*Paul W. Manak*

Paul W. Manak  
Facility Manager

cc: Ashley Chadwick  
Bartow Compliance Manager

Enclosures  
PWM/drs  
2070A

D.E.R.

SEP 10 1992

SOUTHWEST DISTRICT  
TAMPA

2192

VIA CERTIFIED MAIL  
RECEIPT # P 809 530 354

July 28, 1992

D.E.R

JUL 29 1992

SOUTHWEST DISTRICT  
TAMPA

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Beth Knauss, Hazardous Waste

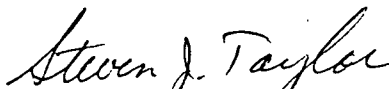
Re: Laidlaw Environmental Services of Bartow, Inc.  
FLD 980 729 610  
Hazardous Waste Operating Permit # H053-182726

Dear Mrs. Knauss:

In accordance with Specific Condition III.6 of the referenced permit, this letter constitutes notification of tank shell thickness below minimum specified in the permit for tank R-203. Tank shell thickness testing on this tank conducted on July 21, 1992, and again on July 23, 1992, confirmed the presence of one area of the side wall of the tank which has a thickness recorded as 0.216". All other measurements were in excess of 0.25". The tank has been cleaned and removed from service. The facility is evaluating the structural integrity of this tank, and repair or replacement options. The Department will be notified of actions taken to correct the situation prior to returning the tank to hazardous waste service, according to 40 CFR 264.196.

If you have any questions, please contact me or Paul Manak at this facility.

Sincerely,



Steven J. Taylor  
Safety and Compliance Manager

cc: Paul Manak  
Ashley Chadwick

2729A

Laidlaw Randon

primary sealant had been snagged by a forklift a day or two earlier, and that repairs would be made on the weekend. The sheer thickness of sealant coating and the actual seal being intact should illustrate that a concerted effort was being made to maintain concreted areas free of cracks and gaps. Emphasis must be added that the primary sealant under the coating was intact. We have discussed this with DER before, and we were of the impression that this issue had been resolved. This can in no way be construed as a threat to human health or the environment. This is not a violation.

CITATION: 403.727(1)(c) and Operating Permit H053-18726, Specific Condition I.8. Failure to amend the contingency plan when the list of emergency equipment changes.

RESPONSE: The list of emergency equipment did not change, only the location of one fire extinguisher. This is a second reference to a previously cited item. See response to citation under 40 CFR 264.52(e).

CITATION: 403.727(1)(c) and Operating Permit H053-182726, Specific Condition II.3. Exceeding the maximum linear row of 11 pallets per row.

RESPONSE: This was cited on the November 26 & 27, 1991, RCRA inspection, and was the result of a typographical error in the preparation of the drawing. As such, a new drawing was prepared and submitted to the Department on May 5, 1992, in response to the enforcement action and as a minor modification to the permit. A letter from William Kutash dated May 27, 1992, (copy attached) stated that "all the actions presented in the response are satisfactory. Therefore, this enforcement case is being closed", and this explanation was presented to the Department at the meeting. To date a response on the modification request has not been received from the Department.

*Lynn Please Check out  
Gil*  
~~This is unfortunate, but I cannot find the PACKAGE and that is why no response has been received - however Laidlaw is aware of proper modification procedures and knows that the "case is closed" letter. The Department agreed to research their files for correspondence pertaining to this matter.~~

CITATION: 403.727(1)(c) F.S. and Operating Permit H053-182726, were not Specific Condition II.8. *constitutes a permit modification - why the permit conditions were not even changed*

RESPONSE: Specific condition II.8 states "containers shall be kept closed except when adding or removing waste and be handled in a manner that will not allow the containers to rupture or leak. If a container holding hazardous waste is not in good condition, or begins to leak, the waste shall be transferred to another container in good condition".

*I cannot find the PACKAGE referenced above which is suppose to address container storage management. I have examined the 4 application notebooks to see if it was placed there, it was not. I have examined all correspondence files - including the Clearwater facility in case of misfiling and I could not find the PACKAGE. I recommend the following ACTIONS (on back)*

1992

Response to

Gill's request

August 13, 1942

1. site this as you already have as a violation  
Laidlaw officials are very knowledgeable concerning Permit  
modifications. They know that all activity shall be as stated  
in the original application and the issued Permit. They know  
that until the modification is approved, the desired change is not  
authorized. Further, they are aware that Permit modifications  
are granted via a signed cover letter from Rick approving  
the modification, indicating exactly what the modification is,  
a statement saying the cover letter shall become a part of  
the Permit and shall be attached to it, and finally an attachment  
presenting the new language for the modified spec. cond.!

2. Advise the applicant that if they desire a modification they  
must submit the request to the local Permitting staff along  
with the \$250.00 Processing fee.



FDER COMMENT: Reference Specific Condition II-7

Facility was storing waste outside of areas designated as storage areas in the Operating Permit H053-086011A.

FACILITY RESPONSE:

The recommended corrective action which was stipulated in the FDER letter is to manage the containers as depicted in the approved application. We consider depiction of the containers in the application as a possible configuration. The depiction was never intended to represent the sole configuration for container placement. Further, the Department has never indicated a problem with storage configurations in past inspections. It was understood that aisle space of three feet (50% greater than required by regulation) and adherence to permitted storage volumes were the primary requirements indicating that permitting and regulatory standards had been met. Since the facility has met these requirements, the act of utilizing another portion of the same storage warehouse does not constitute a violation of either the permit or the regulations.

During our investigation of this matter, it was found that a restriction was placed in our recent "Draft" operating permit which disallowed storage north of the trench in the storage area. This restriction was not noticed during our previous review and we do not understand why this restriction was inserted into the "Draft" since it was not a part of the previous permit and since we do not recall any discussion on the topic.

To resolve this matter, we have agreed to submit a minor modification to indicate that the area north of the trench can be allowed for storage. We understand that storage volumes, aisle space, and other 40 CFR 264 standards for container management apply.

*\*The draft permit (H053-182726) found in folder No. 4-9 matches the language for container management found in the issued permit which is in folder 4-h. Therefore no language changes 2487A were made.*

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFIC. ON NO.: H053-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:

Part I. General (cont'd)

19. The Department may modify the conditions of this permit if any of the conditions of Florida Administrative Code 17-730.290(1) apply.

20. Pursuant to Rule 17-730.290, Florida Administrative Code, this permit may be modified if additional information becomes available indicating that the provisions of Section 3004(u) of the Hazardous and Solid Waste Amendments of 1984 (HSWA) apply to this facility. At that time, this permit may be modified to address the requirements of Section 3004(u) of HSWA if the State has been authorized for these provisions, or alternately, the Environmental Protection Agency would issue a separate federal permit addressing Section 3004(u) requirements.

Part II. Containers

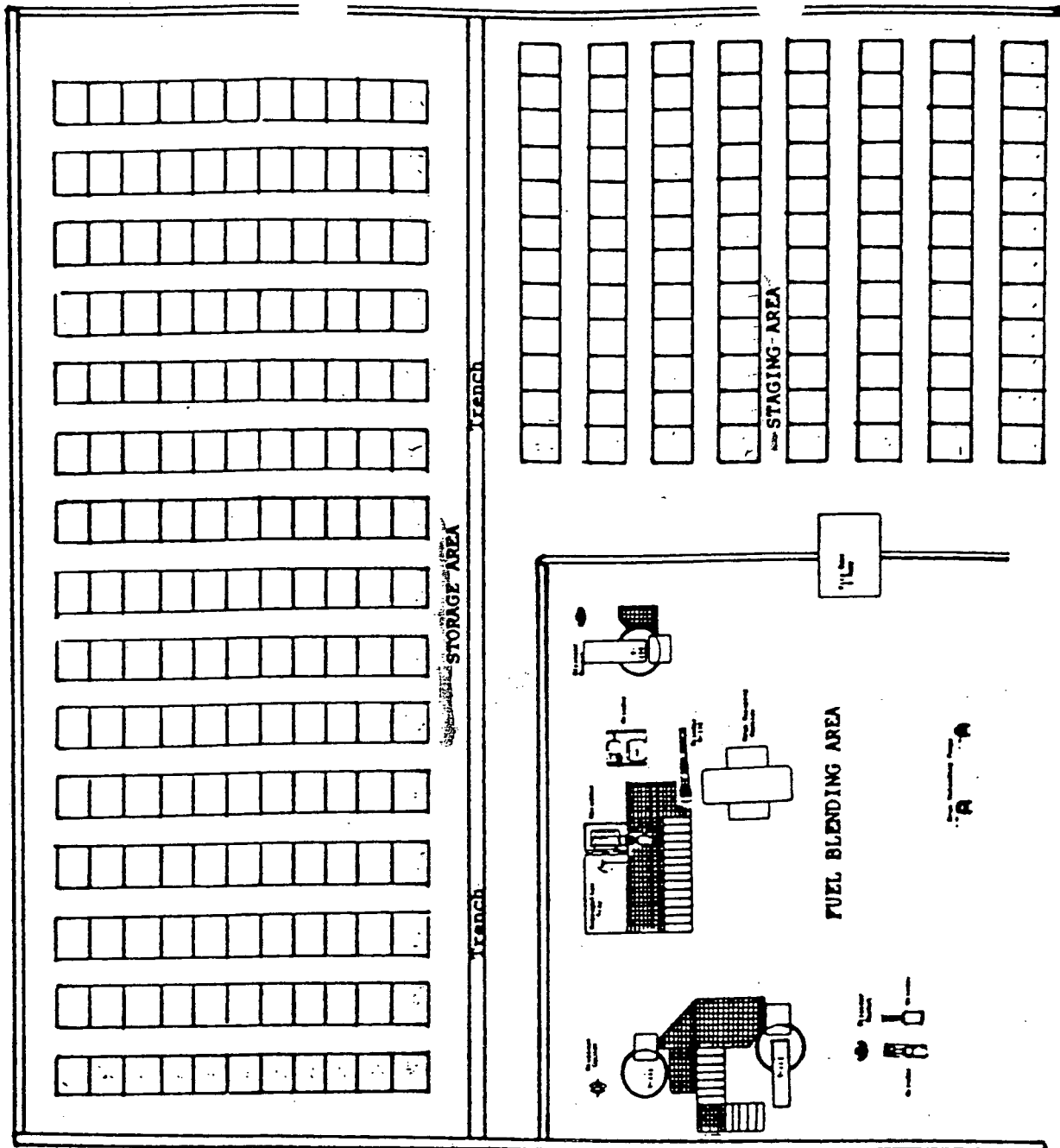
1. ~~Container storage shall be conducted only within the container storage building, in the area located south of the trench.~~ Total container storage volume shall not exceed 81,180 gallons or the volume equivalent to 1,476 - 55 gallon drums.

2. Drum storage shall always be conducted on pallets with a maximum of 220 gallons to a pallet. Drums may be stacked up to 2 pallets high. ~~Each linear row of drums shall have a maximum of 11 pallets.~~ The maximum number of linear rows in the storage area shall not exceed 15 rows. Aisle space between drums or between drums and adjacent walls shall not be less than 3 feet.

3. ~~Staging and sampling of containerized wastes (except bulk containers) shall be conducted only in the northwestern portion of the container storage building as shown in Figure 11.1 of the permit application.~~ All drums shall be situated on pallets during staging. Drum stacking shall be allowed up to 2 pallets high and only for a period not to exceed 24 hours.

4. Storage of any incoming or outgoing bulk container shipments within the facility is not allowed except as an integral part of the shipment. The maximum time any such container may be situated within the facility shall not exceed 10 days. Storage of other containers outside of the drum storage building shall not exceed 24 hours. This condition does not apply to hazardous waste satellite collection containers or to hazardous waste sample containers having a volume of 0.5 gallons or less.

5. All hazardous waste sample containers whose samples are going to be analyzed or have been analyzed shall be stored in the sample container storage cabinets located in the container storage area. Storage of hazardous waste sample containers in the on-site laboratory or outside the container storage area shall not exceed the holding times allowed by the test methods specified in the Waste Analysis Plan.



$$\text{Rows} \times \frac{\text{10 drums}}{\text{row}} \times \frac{\text{8 drums}}{\text{row}} = 1320$$

Figure 11.1 Arrangement of Drums within the Drum Storage Building

# ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

## INFORMATION

Review &amp; Return

Review &amp; File

Initial &amp; Forward

## DISPOSITION

Review &amp; Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate &amp; Report

Initial &amp; Forward

Distribute

Concurrence

For Processing

Initial &amp; Return

FROM:

DATE

PHONE

VIA CERTIFIED MAIL  
RECEIPT #P 809 530 344

June 19, 1992

D. E. R.

Office of RCRA and Federal Facilities  
Waste Management Division  
Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, GA 30365  
Attn: G. Alan Farmer, Chief, RCRA Branch

JUN 22 1992

SOUTHWEST DISTRICT  
TAMPA

Re: Phase I RCRA Organic Emissions from Process Vents  
Laidlaw Environmental Services of Bartow, Inc. FLD 980729610

Dear Mr. Farmer;

Laidlaw Environmental Services submits this letter and attachments in response to Agency concerns expressed in your March 9, 1992, letter regarding process vents emissions determinations at the Bartow solvent recovery facility. As reported to you in our November 14, 1991, letter and attachments, monitoring of process vent emissions has been conducted since October, 1991, on vents from all three process units, with preliminary results reported to you at that time. Due to equipment failures from the severe use conditions, and to the Agency's objections to the methods used, Southern Environmental Sciences, Inc., of Plant City, Florida, was contracted to do process vent organic emissions determinations on the affected vents, using Method 18, from 40 CFR 60, Appendix A, for measurement of gaseous organic compounds, and following procedures specified in 40 CFR 264, Subpart AA for sampling.

Sampling was conducted on April 27, 1992, on all three process units, with waste 1,1,1-Trichloroethane being processed in the fractionation column and thin film evaporator, and waste methylene chloride being processed in the vacuum still. 1,1,1-Trichloroethane was chosen for use in testing because: (a) it is the most commonly recycled material at the facility - 131,130 gallons in 1991 (vs Freon at 88,810 gallons) - and is readily available, (2) it is among the most volatile compounds distilled, (3) in processing it, Freon (a common contaminant) is driven off. Due to these factors, 1,1,1-Trichloroethane can reasonably be expected to produce the highest concentrations of organic vapors in vent streams. The vacuum still is used to process the lowest-purity, highest solids wastes, and is typically not used for processing 1,1,1-Trichloroethane wastes. Methylene chloride waste was used as representative of the highest capacity that can reasonably be expected to be processed through this unit, and also to produce the highest concentrations of organic vapors in vent streams.

Sampling and analyses of the three runs on each unit estimated an overall facility emissions rate (assuming all three units were operating simultaneously) of 5.261 pounds per hour: 3.983 lb/hr from the fractionation column, 1.080 lb/hr from the thin film evaporator, and 0.198 lb/hr from the vacuum still. VOC emissions test summaries are included as Attachment 1.

Based on these results, it was decided to install an additional vent vapor condenser on the fractionation column vent. Due to the small size of the vent, an industrial vendor could not be located, and a device was custom-fabricated for this use. The unit was constructed based on reasonable estimates of organic vapor content (from testing) and from conveniently sized available equipment. Heat transfer is accomplished by cyclonic action of incoming vapors contacting the water/ice bath cooled walls of three stainless steel cylinders before being exhausted through the original vent line. Condensed vapors are collected from a drain line from each cylinder, which is equipped with a vapor trap. While it was estimated that one cylinder would provide adequate capacity to reduce emissions below the 3.0 lb/hr regulatory threshold, the system was over-designed to provide additional information and capacity to allow for unforeseen system upsets. A design drawing of the vent vapor condenser is included as Attachment 2. Vent vapor condenser operating parameters, and monitoring and recordkeeping requirements are included as Attachment 3.

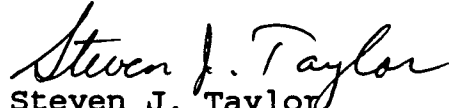
Sampling was again conducted on the fractionation column vent while using the secondary condenser, by Southern Environmental Sciences. Again, testing was conducted in accordance with 40 CFR 264 Subpart AA, and analyses were conducted according to Method 18 of 40 CFR 60, Appendix A. Again, 1,1,1-Trichloroethane waste was the material being processed. Results of these runs showed total column vent emissions to be 0.129 pounds per hour. Combined with previously quantified emissions rates from the thin film evaporator and vacuum still, total facility emissions estimated using the column vent vapor condenser would total 1.407 lb/hr, well under the 3.0 lb/hr regulatory threshold. The VOC emissions test summary is included as Attachment 4.

In order to meet the regulatory requirement of 40 CFR 264, Subpart AA, the column vent vapor condenser will be used each time that the fractionation column is used for distilling organic solvents. Collected condensed compounds are placed in mixed solvent storage tanks for future processing. The column vent vapor condenser unit now in use will be replaced by a more permanent unit after additional testing to properly size, locate, and construct the unit.

Future estimations on process vent emissions will be based on EPA publication AP-42, "Compliance of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources", Fourth Edition, using process vent emission factors which closely approximate the emissions determined in these tests.

We trust that this satisfies the Agency's concerns regarding process vents emissions at this facility. If you have any questions, please contact me or Paul Manak at (813)533-6111.

Sincerely,

A handwritten signature in cursive script that reads "Steven J. Taylor".

Steven J. Taylor  
Safety and Compliance Manager

copy to: Paul Manak, LES, Bartow  
Ashley Chadwick, LES, Antioch  
Tom John, Tom John Engineering  
Satish Kastury, FDER, Tallahassee  
Gary Santti, FDER, Tampa

**TABLE 1. VOC EMISSIONS TEST SUMMARY**

**Company:** LAIDLAW ENVIRONMENTAL SERVICES, INC.  
**Source:** THIN FILM EVAPORATOR VENT  
**Date:** 4/27/92

RUN # 1		STACK		
		FLOWRATE	---EMISSIONS---	
COMPOUND	mg/m3	scfm	lbs/ft3	lbs/hr
ACETONE	1,600	1.8791	9.99E-05	0.011
1,1 DICHLOROETHENE	1,600	1.8791	9.99E-05	0.011
METHYLENE CHLORIDE	2,500	1.8791	1.56E-04	0.018
1,1,1 TRICHLOROETHANE	150,000	1.8791	9.37E-03	1.056
FREON	10,000	1.8791	6.24E-04	0.070
			Sum	1.166

RUN # 2		STACK		
		FLOWRATE	---EMISSIONS---	
COMPOUND	mg/m3	scfm	lbs/ft3	lbs/hr
ACETONE	1,000	1.8791	6.24E-05	0.007
1,1 DICHLOROETHENE	960	1.8791	5.99E-05	0.007
METHYLENE CHLORIDE	1,500	1.8791	9.37E-05	0.011
1,1,1 TRICHLOROETHANE	97,000	1.8791	6.06E-03	0.683
FREON	10,000	1.8791	6.24E-04	0.070
			Sum	0.778

RUN # 3		STACK		
COMPOUND	mg/m3	FLOWRATE scfm	---EMISSIONS---	
			lbs/ft3	lbs/hr
ACETONE	2,300	2.0879	1.44E-04	0.018
1,1 DICHLOROETHENE	1,500	2.0879	9.37E-05	0.012
METHYLENE CHLORIDE	2,000	2.0879	1.25E-04	0.016
1,1,1 TRICHLOROETHANE	140,000	2.0879	8.74E-03	1.095
FREON	20,000	2.0879	1.25E-03	0.156
			Sum	1.297
		Average Emissions		1.080



TABLE 2. VOC EMISSIONS TEST SUMMARY

Company: LAIDLAW ENVIRONMENTAL SERVICES, INC.  
 Source: COLUMN REFLUX  
 Date: 4/27/92

RUN # 1		STACK		
		FLOWRATE	---EMISSIONS---	
COMPOUND	mg/m3	scfm	lbs/ft3	lbs/hr
ACETONE	120,000	1.3571	7.49E-03	0.610
CHLOROMETHANE	450	1.3571	2.81E-05	0.002
1,1 DICHLOROETHANE	560	1.3571	3.50E-05	0.003
1,1 DICHLOROETHENE	4,600	1.3571	2.87E-04	0.023
TOTAL 1,2 DICHLOROETHYLENE	940	1.3571	5.87E-05	0.005
METHYLENE CHLORIDE	93,000	1.3571	5.81E-03	0.473
1,1,1 TRICHLOROETHANE	110,000	1.3571	6.87E-03	0.559
TRICHLOROFLUOROMETHANE	10,000	1.3571	6.24E-04	0.051
FREON	900,000	1.3571	5.62E-02	4.576
UNKNOWN HYDROCARBON	30,000	1.3571	1.87E-03	0.153
			Sum	6.454

RUN # 2		STACK		
		FLOWRATE	---EMISSIONS---	
COMPOUND	mg/m3	scfm	lbs/ft3	lbs/hr
ACETONE	64,000	1.0440	4.00E-03	0.250
CHLOROMETHANE	670	1.0440	4.18E-05	0.003
1,1 DICHLOROETHENE	2,600	1.0440	1.62E-04	0.010
METHYLENE CHLORIDE	27,000	1.0440	1.69E-03	0.106
1,1,1 TRICHLOROETHANE	3,400	1.0440	2.12E-04	0.013
TRICHLOROFLUOROMETHANE	20,000	1.0440	1.25E-03	0.078
FREON	500,000	1.0440	3.12E-02	1.956
UNKNOWN HYDROCARBON	80,000	1.0440	4.99E-03	0.313
			Sum	2.729

RUN # 3		STACK		
		FLOWRATE	---EMISSIONS---	
COMPOUND	mg/m3	scfm	lbs/ft3	lbs/hr
ACETONE	96,000	0.7308	5.99E-03	0.263
1,1 DICHLOROETHANE	580	0.7308	3.62E-05	0.002
1,1 DICHLOROETHENE	5,200	0.7308	3.25E-04	0.014
TOTAL 1,2 DICHLOROETHYLENE	610	0.7308	3.81E-05	0.002
METHYLENE CHLORIDE	130,000	0.7308	8.12E-03	0.356
1,1,1 TRICHLOROETHANE	98,000	0.7308	6.12E-03	0.268
TRICHLOROFLUOROMETHANE	10,000	0.7308	6.24E-04	0.027
FREON	600,000	0.7308	3.75E-02	1.643
UNKNOWN HYDROCARBON	70,000	0.7308	4.37E-03	0.192
			Sum	2.766
			Average Emissions	3.983

Attachment 1 (continued)

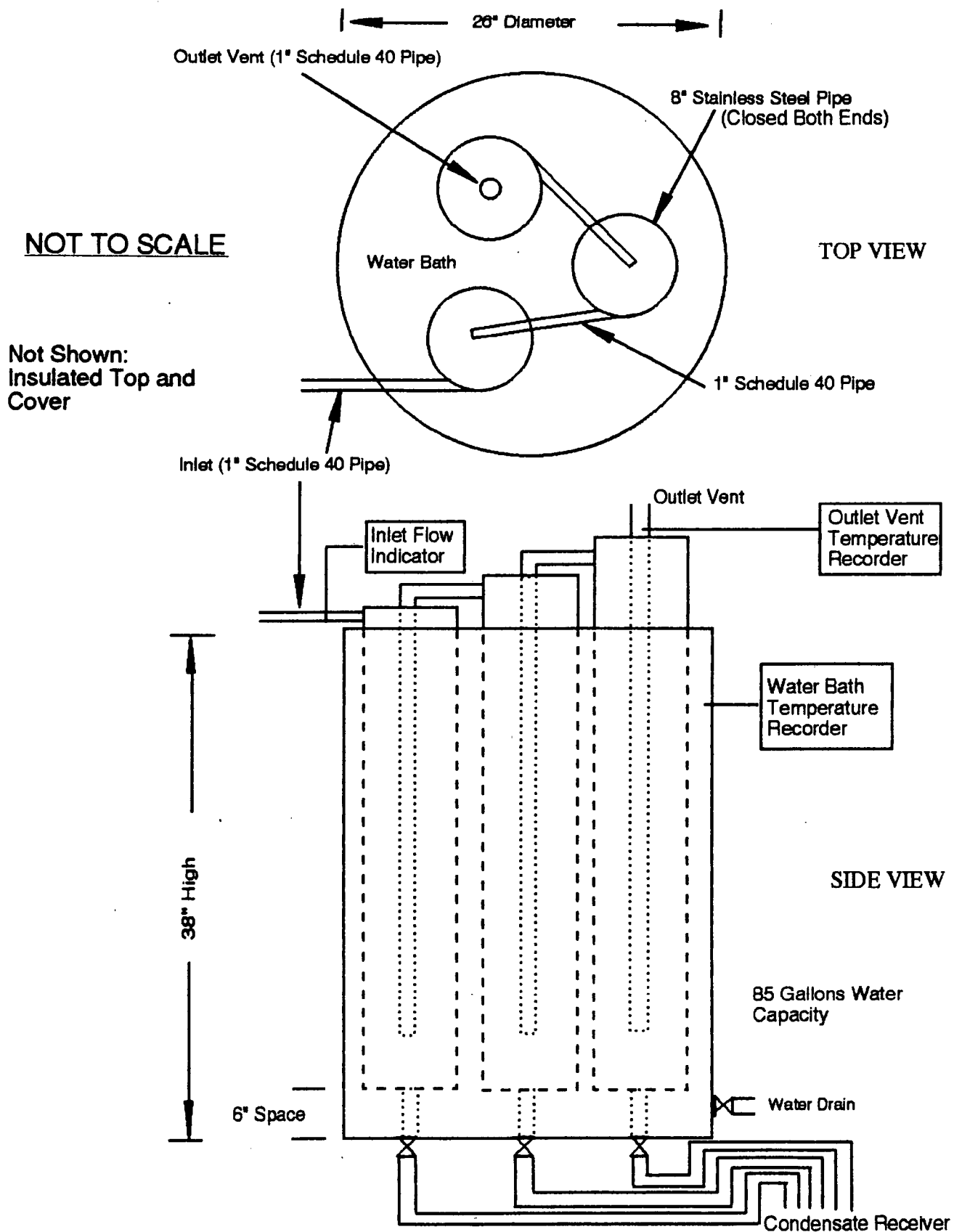
**TABLE 3. VOC EMISSIONS TEST SUMMARY**

**Company:** LAIDLAW ENVIRONMENTAL SERVICES, INC.  
**Source:** VACUUM STILL  
**Date:** 4/27/92

RUN # 1		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
METHYLENE CHLORIDE	130,000	0.5752	8.12E-03	0.280
TETRACHLOROETHENE	510	0.5752	3.18E-05	0.001
1,1,1 TRICHLOROETHANE	630	0.5752	3.93E-05	0.001
1,1,2 TRICHLOROETHANE	1,800	0.5752	1.12E-04	0.004
FREON	2,000	0.5752	1.25E-04	0.004
			Sum	0.291

RUN # 2		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
METHYLENE CHLORIDE	96,000	0.4794	5.99E-03	0.172
TETRACHLOROETHENE	870	0.4794	5.43E-05	0.002
1,1,1 TRICHLOROETHANE	470	0.4794	2.93E-05	0.001
1,1,2 TRICHLOROETHANE	860	0.4794	5.37E-05	0.002
FREON	1,000	0.4794	6.24E-05	0.002
			Sum	0.178

RUN # 3		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
ACETONE	2,200	0.4794	1.37E-04	0.004
METHYLENE CHLORIDE	65,000	0.4794	4.06E-03	0.117
TETRACHLOROETHENE	360	0.4794	2.25E-05	0.001
1,1,1 TRICHLOROETHANE	930	0.4794	5.81E-05	0.002
FREON	1,000	0.4794	6.24E-05	0.002
UNKNOWN HYDROCARBON	600	0.7162	3.75E-05	0.002
			Sum	0.125
			Average Emissions	0.198



LESB Fractionation Column Vent Vapor Condenser

Attachment 2

**FRACTIONATION COLUMN VENT VAPOR CONDENSER  
CONSTRUCTION MATERIALS AND MONITORING EQUIPMENT**

**Outer container: 38" high x 26" diameter steel drum.**

**Condenser tubes: 8" diameter schedule 40 stainless steel pipe, closed at both ends.  
34", 36", and 38" in length.**

**Inlet and outlet piping: 1" schedule 40 steel pipe.**

**Internal piping: 1" schedule 40 stainless steel pipe.**

**Condenser tube drain lines: 1/2" schedule 40 steel pipe.**

**Insulation: 4" glass wool, with aluminum protective outer cover.**

**Top cover: Removable aluminum/glass wool.**

**Inlet flow indicator: Continuous-reading magnetic flowmeter.**

**Water bath temperature indicator: Continuous-recording thermometer to dual-pen  
chart.**

**Outlet vent temperature indicator: Continuous-recording thermometer to dual-pen  
chart.**

**Attachment 2 (continued)**

## FRACTIONATION COLUMN VENT VAPOR CONDENSER

### OPERATING PARAMETERS

1. Water Bath: Maintain water bath temperature below 34° F.
2. Outlet Vent Temperature: Observe recording at 1-hour intervals. Temperature should not exceed 75° F.
3. Inlet Flow Indicator: Record inlet flow at 1-hour intervals.
4. Record amounts of condensate recovered from each cylinder and time intervals.

### RECORDKEEPING

On the operating log form, record:

1. At intervals of 1 hour, main condenser temperature.
2. At intervals of 1 hour, inlet flow.
3. As necessary, volume of condensate recovered and time.

Maintain other process operations records as required.

**TABLE 1. VOC EMISSIONS TEST SUMMARY**

**Company:** LAIDLAW ENVIRONMENTAL SERVICES, INC.  
**Source:** COLUMN REFLUX VENT  
**Date:** 6/3/92

RUN # 1		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
ACETONE	16000	0.2297	9.99E-04	0.014
1,1 DICHLOROETHENE	2000	0.2297	1.25E-04	0.002
METHYLENE CHLORIDE	34000	0.2297	2.12E-03	0.029
1,1,1 TRICHLOROETHANE	4200	0.2297	2.62E-04	0.004
TRICHLOROFLUOROMETHANE	11000	0.2297	6.87E-04	0.009
UNKNOWN HYDROCARBON	10000	0.2297	6.24E-04	0.009
			Sum	0.066

RUN # 2		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
METHYLENE CHLORIDE	8100	0.4802	5.06E-04	0.015
1,1,1 TRICHLOROETHANE	74000	0.4802	4.62E-03	0.133
1,1,2 TRICHLORO-1,2,2 TRIFLU	50000	0.4802	3.12E-03	0.090
UNKNOWN HYDROCARBON	5000	0.4802	3.12E-04	0.009
			Sum	0.247

RUN # 3		STACK	---EMISSIONS---	
COMPOUND	mg/m3	FLOWRATE scfm	lbs/ft3	lbs/hr
1,1,1 TRICHLOROETHANE	53000	0.3758	3.31E-03	0.075
			Sum	0.075

**Average Emissions 0.129**

State of Florida  
Department of Environmental Regulation

# District Routing Slip

To: Lynn Melman

Date: 6-30-92

C.C. To:

	<b>Pensacola</b>	<b>Northwest District</b>	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	Northwest District Satellite Office	
✓	<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 <input type="checkbox"/>		Reply Required <input type="checkbox"/>	Info Only <input type="checkbox"/>
Date Due _____		Date Due: _____	

Comments:

D. E. R.

JUL 02 1992

SOUTHWEST DISTRICT  
TAMPA

From:

LORRAINE CLARK

Tel.:



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 30, 1992

D.E.R.

JUL 02 1992

SOUTHWEST DISTRICT  
TAMPA

Ms. Elaine McBride Jenkins  
Laidlaw Environmental Services, Inc.  
Post Office Box 210799  
Columbia, South Carolina 29221

Re: Laidlaw Environmental, Bartow, Florida  
FLD 980 729 610

Dear Ms. Jenkins:

I am returning three originals of the amendment to your trust fund agreement. I have signed them and acknowledged the changes to Schedule A and B and Exhibit A.

Sincerely,

*Lorraine G. Clark*

Lorraine G. Clark  
Environmental Specialist  
Hazardous Waste Regulation

LGC/mh

Enclosures

cc: Jeff Pallas, EPA, Atlanta  
✓ Lynn Milanian, DER, Tampa  
Doug Outlaw, DER, Tallahassee





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

D. E. R.

JUN 24 1992

JUN 29 1992

4WD-RCRA/FF

SOUTHWEST DISTRICT  
TAMPA

Steven J. Taylor  
Safety and Compliance Manager  
Laidlaw Environmental Services of Bartow, Inc.  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

RE: ~~Confirmatory Sampling/Integrity~~ Testing Report  
Laidlaw Environmental Services of Bartow  
EPA I.D. Number FLD 980 729 610

Dear Mr. Taylor:

The United States Environmental Protection Agency (EPA) has reviewed the report on the integrity testing of the fume hood collection tank. The results of this testing appear to indicate that no further action for this Solid Waste Management Unit (SWMU) will be required at this time. However, as stated in Condition II.C. of your Hazardous and Solid Waste Amendments (HSWA) permit, Laidlaw must notify Region IV if any new releases are discovered from this SWMU.

If you have any further questions in this matter, please feel free to contact Ms. Carin DeBenedictis, of my staff, at (404) 347-3433.

Sincerely yours,

G. Alan Farmer  
Chief, RCRA Branch  
Waste Management Division

cc: Satish Kastury, FDER, Tallahassee  
✓ Lynn Milanian, FDER, Southwest District

Via Certified Mail  
Receipt #P 809 530 248

H053-182726

AI, 4-10

May 1, 1992

D.E.R.

Office of RCRA and Federal Facilities  
Waste Management Division  
U.S. Environmental Protection Agency, Region IV  
345 Courtland Street  
Atlanta, GA 30365

MAY - 6 1992

SOUTHWEST DISTRICT  
TAMPA

Attn: G. Alan Farmer, Chief, RCRA Branch

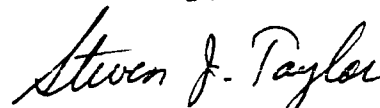
RE: Confirmatory Sampling - Fume Hood Collection Tank  
Laidlaw Environmental Services of Bartow, Inc.  
EPA I.D. Number FLD 980 729 610

Dear Mr. Farmer:

I have enclosed the engineer's certification that the fume hood collection tank passed the integrity test as specified in the confirmatory sampling workplan which was approved on February 13, 1992. Despite the fact that this tank was neither constructed nor used as a pressurized vessel, it was nonetheless sealed, resulting in considerable deformation when the specified head of water was applied. Since no loss of liquid occurred under these extreme conditions, the tank was judged to be sound and non-leaking. It has subsequently been removed from service and the lab sink drain lines have been connected directly into the city sewer system.

We trust that this resolves and closes this matter. If you have any questions, please contact Paul Manak or myself at (813) 533-6111.

Sincerely,



Steven J. Taylor  
Safety and Compliance Manager

SJT/br

cc: Paul Manak, LES, Bartow  
Ashley Chadwick, LES, Antioch  
Satish Kastury, FDER, Tallahassee  
Bill Crawford, FDER, Tampa

2476A

# **R.O. COVINGTON & ASSOCIATES**

## **CONSULTING ENGINEERS**

Bartow Industrial Park  
225-A Bartow Municipal Airport  
Bartow, Florida 33830-9504  
Phone: (813) 533-6282  
Fax: (813) 534-1723

RECEIVED

APR 28 1992

LAIDLAW

April 20, 1992

Steven J. Taylor  
Safety and Compliance Manager  
Laidlaw Environmental Services of Bartow, Inc.  
170 Municipal Airport  
Bartow, FL 33830-9504

Dear Mr. Taylor:

Ref: 0X011

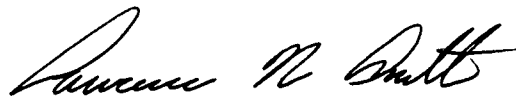
Subject: Confirmatory Sampling Workplan

The Tank Integrity test proposed in our letter of January 15, 1992 was conducted on April 17, 1992. The test was witnessed for a period of 1 hour with 10' head pressure. No leaks were detected nor was any drop in water level observed.

The tank passed its test.

If there are any questions concerning the test please don't hesitate to call.

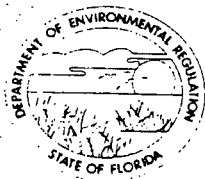
Yours truly,



Lawrence N. Smith

LNS/ve

*Robert O. Covington*  
4/25/92



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Satish Kastury

THRU: Gary Santti *AS 4-1*

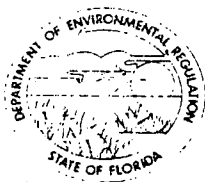
FROM: Bill Crawford *pic s/f*

DATE: May 5, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610  
Operating Permit Application HO53-182726  
Request for Minor Modification

Attached please find the submittal dated May 5, 1992 and submitted May 5, 1992. Should you have any comments regarding the proposed modifications, please provide them within 45 days.

c.c. Alan Farmer EPA/REGION IV



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

# Interoffice Memorandum

For Routing To Other Than The Addressee	
Location:	
Location:	
Location:	
Date:	

TO: Gary A. Maier, Air

FROM: Bill Crawford, Hazardous Waste *PCW*

DATE: March 23, 1991

SUBJECT: Laidlaw Environmental Services (Bartow), Inc.  
Proposed Paint Can Crusher

*H053-182726*

*AI 4, i*

The proposed paint can crusher as described and handling only household hazardous waste or exempt waste would be exempt from hazardous waste permitting. The concerns we have with the information presented are related to the cleaning solvents and the emissions calculations.

It appears that Laidlaw has use the open end of the drum to calculate the emissions and neglected the emissions from the equipment cleaning operations. Should you have any questions please contact Beth Knauss or myself.

*1292*

MEMORANDUM

TO: Bill Crawford, Hazardous Waste  
FROM: Gary A. Maier, Air *Gary A. Maier*  
DATE: March 19, 1992  
SUBJECT: Laidlaw Environmental Services

D. E. R.

MAR 19 1992

SOUTHWEST DISTRICT  
TAMPA

Attached, for your information, is a process description for a proposed new air pollution source at Laidlaw Environmental Services of Bartow, Inc. Briefly, the source will crush cans which contain waste collected from household hazardous waste collection programs, such as "amnesty days".

If you are interested in more information, I will send you a copy of the entire application. Our contact person at Laidlaw regarding this proposed project is Steve Taylor, (813) 533-6111.

D. E. R.

MAR 19 1992

SOUTHWEST DISTRICT  
TAMPA

FDER

AIR CONSTRUCTION PERMIT APPLICATION  
CAN CRUSHING OPERATION

Prepared For:

LAYDLAW ENVIRONMENTAL SERVICES, INC.

170 Bartow Municipal Airport

Bartow, Florida

Prepared By:

TOM JOHN ENGINEERING, INC

Tampa, Florida

## Process Description and Emission Estimates

The project consists of the addition of a can crushing machine and liquid receiving drum (see Figure 3.1) to the fuel blending/drum sampling area (shown in Attachment 2). The currently permitted (AC53-185320, item (k)) paint can crusher/emptying apparatus is expected to be used primarily as back up for, and on an irregular basis in addition to, the proposed new crusher. In operation, the proposed crusher will process one and five gallon cans partially filled with used paint, including water-based latex, thinners and paint removers which are collected principally from household hazardous waste collection programs (such as Amnesty Days). The cans are received containerized, lab-packed in 55 gallon drums or three yard containers. All cans remain sealed until the start of the processing. After opening, the contents of the can are poured into the drain trough if the material has a low enough viscosity or solids content. Up to five drained one gallon or one five gallon can will be charged, open end down, into the crusher. A hydraulically driven press flattens the can(s) and forces any remaining liquid down through the collection funnel into the 55 gallon collection drum. The drum is kept closed when not in use and the trough is cleaned out at the end of processing. Typically, 1 to 2 drums will be filled during a shift, for an expected maximum of 110 gallons collected per day.

Since the basic procedure and can contents would be the same for both crushers, operation of the proposed can crusher is anticipated to result in air emissions essentially equivalent to those of the existing crusher. In actual fact, since the existing can crusher requires that the cans be loaded with the opening horizontal, the resulting splatter of paint during crushing in all likelihood would produce more emissions than the proposed system. Therefore, use of the new crusher instead of the currently permitted crusher would not be expected to result in an increase in air emissions. During those periods in which



both machines operate simultaneously, the air emissions would be essentially doubled, but this situation is not expected to occur with any regularity or frequency. Also, during this time other permitted sources in the area, such as drum pumping, chopping/size reduction, and mix tank filling, would not be operating, resulting in a net area decrease in air emissions for the area.

The increase in emissions due to simultaneous operation may be conservatively estimated as follows:

Exposed area of open drum: 2.89 ft<sup>2</sup>

Maximum evaporation rate of freon: 1.4 lb/(hr · ft<sup>2</sup>)  
(from data supplied in AC53-185320)

Assumed "typical" evaporation rate of "average"  
component: 0.7 lb/(hr · ft<sup>2</sup>)

(based on average value of vapor pressures for component materials plus reasonable safety factor)

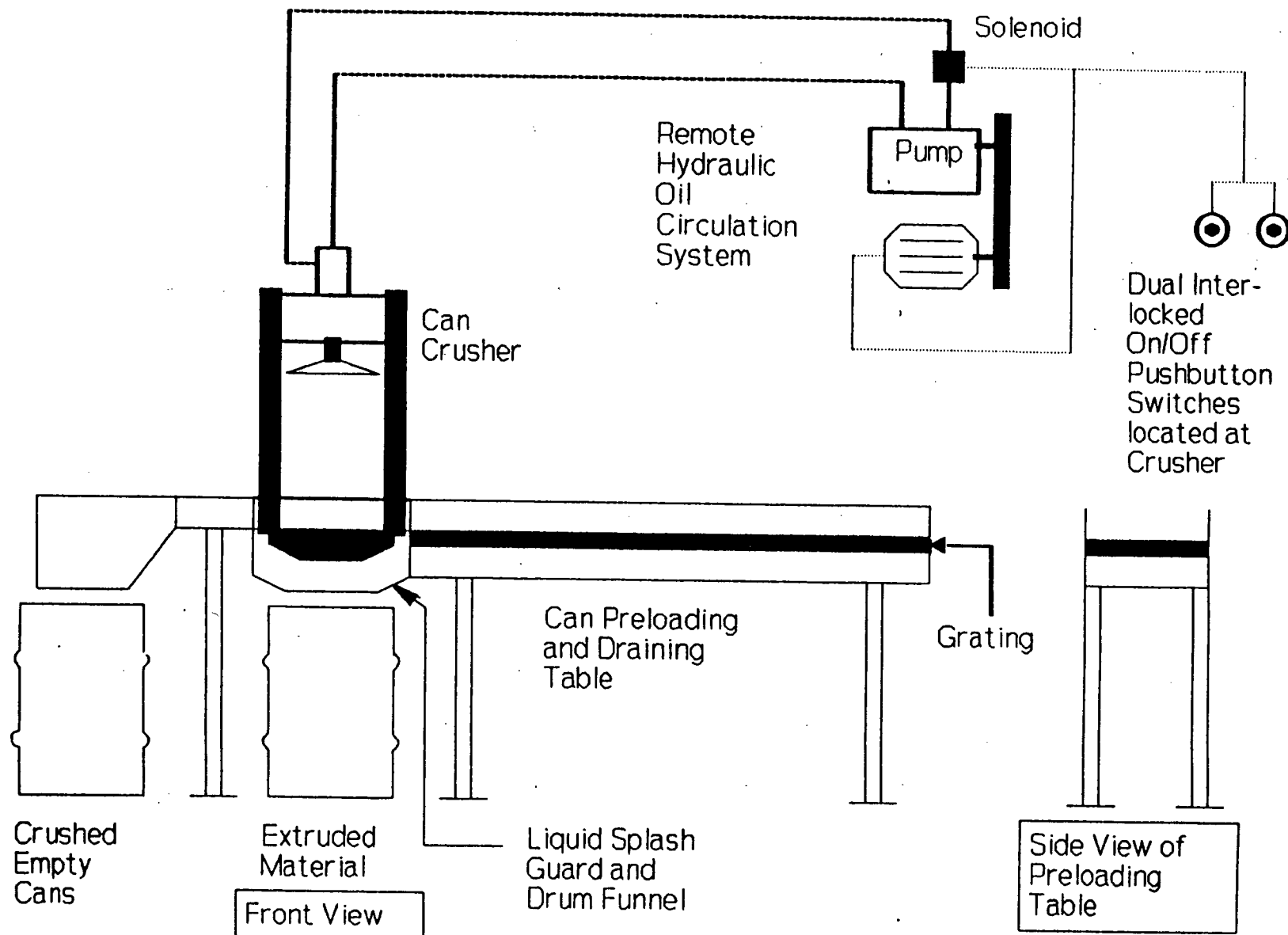
$$\frac{0.7 \text{ lb}}{\text{hr} \cdot \text{ft}^2} \times 2.89 \text{ ft}^2 = 2.02 \frac{\text{lb}}{\text{hr}} \times 2000 \frac{\text{hrs}}{\text{yr}} \times \frac{\text{ton}}{2000} \text{ lb} = 2.02 \text{ TPY}$$

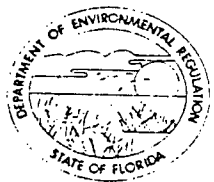
By requesting a maximum of 2000 hours per year of simultaneous can crusher operations, the net increase in air emissions will be limited to (conservatively) 2 tons per year. The applicant requests that either machine individually be allowed to operate without restrictions, and recognizes the obligation to ensure that the 2000 hours per year of simultaneous operation is not exceeded. To provide the Department with this reasonable assurance, the applicant proposes to record the times when both units are operating over the period of the construction permit, providing a summary of that log with the Certificate of Completion of Construction.

DRAFT

CAN CRUSHING SYSTEM

FIGURE 3.1





State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
_____	Location: _____
_____	Location: _____
_____	Location: _____
_____	Date: _____

# Interoffice Memorandum

TO: SATISH KASTURY

*AT 4-1*

FROM: BILL CRAWFORD *cc*

DATE: MARCH 2, 1992

SUBJECT: LAIDLAW ENVIRONMENTAL SERVICES (BARTOW), FLD 980 729 610  
OPERATING PERMIT APPLICATION HO53-182726  
SPECIFIC CONDITION III-6

ATTACHED PLEASE FIND THE SUBMITTAL DATED FEBRUARY 26, 1992 AND SUBMITTED FEBRUARY 27, 1992. PLEASE HAVE THE APPROPRIATE PAGES OF THE APPLICATION UPDATED.

C.C. ALAN FARMER EPA/REGION IV

*1192*

AE, 4-1

D.E.R.

Februray 26, 1992

FEB 27 1992

SOUTHWEST DISTRICT  
TAMPA

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Bill Crawford, Hazardous Waste Permitting

Re: Laidlaw Environmental Services of Bartow, Inc. FLD980729610  
Operation of a Hazardous Waste Storage and Fuel Blending  
Facility, Permit #H053-182726

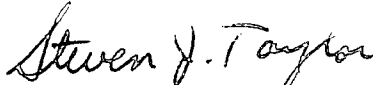
Dear Mr. Crawford;

Pursuant to Specific Condition # III.6 of the referenced  
permit, we submit the following as minimum wall thickness values for  
tanks T-111, T-112, T-114, R-202, and R-203:

<u>Tank Number</u>	<u>Minimum Thickness</u>	
	<u>Head</u>	<u>Wall</u>
T-111	0.375"	0.25"
T-112	0.375"	0.25"
T-114	0.375"	0.25"
R-202	0.3125"	0.3125"
R-203	0.3125"	0.3125"

If you have any further questions, please contact me or Paul  
Manak at (813) 533-6111.

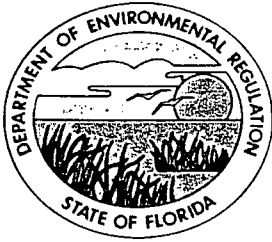
Sincerely,

  
Steven J. Taylor  
Safety and Compliance Manager

SJT/drs

cc: Paul Manak  
Ashley Chadwick  
James Kutzman, USEPA, Region IV

2292A



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

AI 4-i

December 11, 1991

Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Re: Laidlaw Environmental Services of Bartow, FLD 980 729 610  
Operating Permit HO53-182726  
Import of Hazardous Waste From Freeport, Grand Bahamas Islands

Dear Mr. Manak:

The Florida Department of Environmental Regulation (FDER) has received and reviewed the notice submitted by Mr. Steve Taylor of your staff in letters dated October 15 and December 4, 1991. This notified the FDER that Laidlaw Environmental Services of Bartow (LESB) intends to receive waste methylene chloride (F002), acetone (F003), methanol (F005), and incinerator ash, all of which are hazardous waste, from Freeport, Grand Bahamas Islands.

LESB is required to notify the FDER, prior to receiving this waste, by Specific Condition I-1 of the operating permit and by paragraph 264.12 Title 40 Code of Federal Regulations. The management of these waste codes at LESB is consistent with the operations permitted at that location.

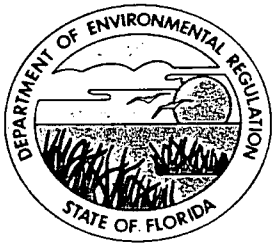
Should you have any questions, please feel free to contact me at (813) 620-6100, ext 388.

Sincerely,

William C. Crawford  
Permitting Engineer  
Hazardous Waste Management  
Division of Solid Waste

WCC

cc: James Kutzman EPA Region IV  
Satish Kastury FDER Tallahassee



# *Florida Department of Environmental Regulation*

**Southwest District**

Lawton Chiles, Governor

• 4520 Oak Fair Boulevard •

813-623-5561

Tampa, Florida 33610-7347

Carol M. Browner, Secretary

*AT, 4-10*

December 10, 1991

Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Re: Laidlaw Environmental Services of Bartow, FLD 980 729 610  
Operating Permit HO53-182726  
Groundwater Monitoring

Dear Mr. Manak:

The Florida Department of Environmental Regulation (FDER) has received and reviewed the information submitted by Mr. Steve Taylor of your staff in letters dated November 26 and December 3, 1991. This information describes the presence of "low concentration of some volatile organic compounds" in some of the monitoring wells at your facility. It appears that corrective action to cleanup the groundwater will be required, however the exact mechanism to accomplish this cleanup is still to be determined.

The FDER will need additional details on the monitoring wells, stormwater management practices, and sampling procedures to correctly direct the cleanup activities at the Laidlaw Environmental Services of Bartow (LESB) facility. The needed information is presented below:

- I. Monitoring Wells
  - a. Well construction details
  - b. Lithology logs
  - c. Survey data on all wells (referenced to mean sea level)
  - d. Groundwater elevation and groundwater quality data presented in tabular form
  - e. A description of the potable water wells within 0.5 miles, and a preliminary assessment of any potential impact on these wells.

**II. Stormwater Management**

- a. A site map showing the stormwater retention pond.
- b. The construction details of the stormwater retention pond.
- c. Water elevation in the stormwater retention pond if available.
- d. The site map should indicate the areas that drain to the stormwater management system.
- e. A description of the stormwater management procedures.
- f. A tabular presentation of all available water quality data for the stormwater in the system and pond should be provided. If none is available a sample should be taken and analyzed for all appropriate constituents.
- g. Available rainfall information for 1991.

**III. Sample Management**

- a. Identify the company that takes the groundwater samples
- b. Describe the equipment used to collect the groundwater samples
- c. Describe the methodology used to obtain the groundwater samples
- d. Provide the Quality Assurance (QA) approved plan number
- e. The chain of custody sheet for the all sampling events is needed

Additionally, the MSD sheets and the application procedures for the sealants used to repair the roadway is needed.

Should you have any questions, please feel free to contact Dianne Trommer at (813) 620-6100 ext 381 or myself at (813) 620-6100 ext 388.

Sincerely,



William C. Crawford  
Permitting Engineer  
Hazardous Waste Management  
Division of Solid Waste

wcc

cc: James Kutzman EPA Region IV  
Satish Kastury FDER Tallahassee  
Dianne Trommer FDER Tampa



November 26, 1991

Resource Recovery

LAWLAN ENV SVC

4053-182726

A 4-2  
D.E.R.

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Bill Crawford

DEC 2 1991

SOUTHWEST DISTRICT  
TAMPA

Dear Mr. Crawford:

Wells voluntarily installed by Tricil Recovery Services to monitor the quality of groundwater in the surficial aquifer have been sampled regularly since the facility began operation in order to detect the presence of contaminants before a concern arose. All past sampling events have yielded analyses indicating no areas of concern. Results of recent analyses of water samples have detected the presence of very low concentrations of some volatile organic compounds in the three wells adjacent to the stormwater retention pond at the southeast corner of the property, at concentrations of less than 100 parts per billion (summary attached). The variability of the compounds found, and of the amounts identified, leads us to believe that contamination originated from several discrete events, and is unrelated to the management of hazardous wastes or the operation of RCRA units, since all units have been visually inspected for breach of containment and found to be sound. Further, since all storage tanks are above ground, all processing is done in covered, contained areas and all containment structures are sound, we believe the compounds seen are the result of stormwater runoff from the curbed concrete driveway, which has picked up grease, lubricants, fuels, and other substances from vehicles and discharged to the retention area. As a reminder, this year we received significantly more rainfall than in previous years since the facility began operation. Rainfall runoff from the driveway used by heavy vehicles (not waste management) every day could account for many of the chemicals found. Even the sealant materials used to repair the cracks in the driveway contain several of the constituents identified in the groundwater samples.

We would like to meet with you at your earliest convenience to discuss this matter. I will call to schedule a meeting.

Sincerely,

Steve Taylor  
Safety and Compliance Manager

ST/drs

cc: SWFWMD, Brooksville

1949A



## Summary of 1991 Groundwater Monitoring Results

Groundwater analyses on monitoring well #7 (nearest to the in-plant stormwater retention pond) have been completed on three different occasions this year. Multiple samplings were conducted because of the failure of the laboratories to take trip and field blanks, the presence of contaminants in blanks that were taken, or to confirm results. Results are as follows:

<u>Date</u>	<u>Organics Detected</u>	<u>ug/L</u>
May 22, 1991	1,1,-Dichloroethane	36
	Ethylbenzene	10
	Methylene Chloride	58 B
	Toluene	120
	1,1,1-Trichloroethane	20
	Trichlorofluoromethane	580 J
	Xylene	35
	1,1,2-Trichloro-1,2,2-trifluoroethane	180*
	1,4-Dimethyl benzene	39.0*
	2-Butoxy-ethanol	17*
	2-(2 butoxyl-ethanol)	51*
	Ethyl benzene	11*
August 19, 1991	Toluene	4.62
	Trichlorofluoromethane	63.1
October 19, 1991	1,1,-Dichloroethane	7.34
	1,1-Dichloroethene	6.55
	Toluene	9.98
	1,1,1-Trichloroethane	63.0
	Trichloroethene	1.64
	Trichlorofluoromethane	69.6

B = Detected in blank.

J = Detected, but below quantitation limit, estimated.

\* = Tentatively identified on MS, estimated concentration.

ST/drs

1925A

## Sampling Results from 11/16/91

# 3A	ug/L
1,1-Dichloroethane	21
1,1-Dichloroethene	16
Methylene Chloride	10
1,1,1-Trichloroethane	64
1,1,2-Trichloro-1,2,2-Trifluoromethane	4 *

# 6 (Well accidentally left open overnight prior to sampling)

Acetone	1,600 J
2-Butanone	210
1,1-Dichloroethane	36
1,1-Dichloroethene	11
Methylene Chloride	35
Tetrachloroethene	3
Toluene	2
1,1,1-Trichloroethane	24
Trichloroethene	440

# 7

1,1-Dithloroethane	7
1,1-Dichloroethene	5
Methylene Chloride	2
Tetrachloroethene	2
Toluene	2
1,1,1-Trichloroethane	14
Trichloroethene	2
Xylene	1
Trichlorofluoromethane	38
1,1,2-Trichloro-1,2,2-trifluoroethane	260 *

J = Detected, but below quantitation limit, estimated.

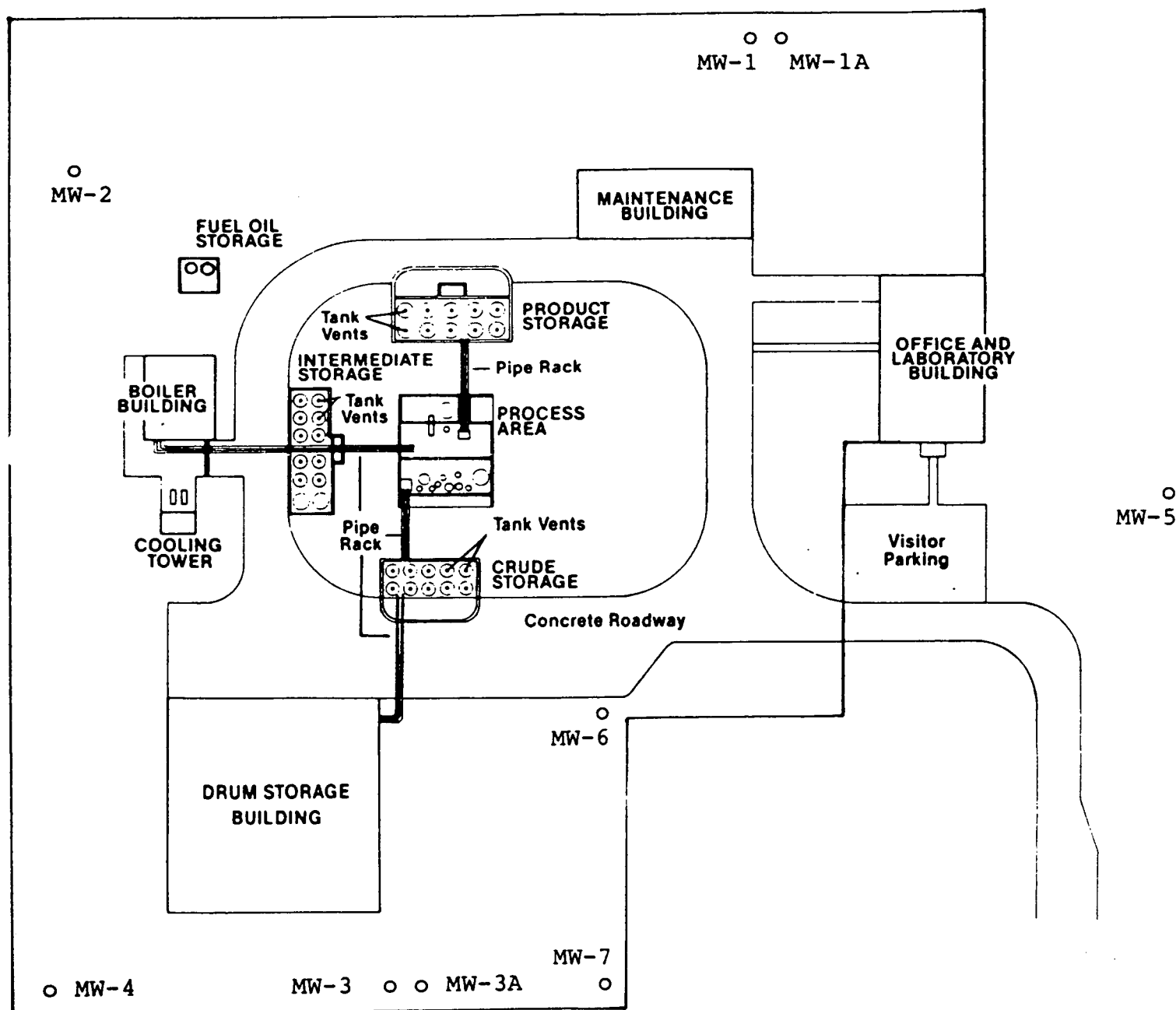
\* = Tentatively identified on MS, estimated concentration.

1965A



# Site Map

Tricil Recovery Services Inc.



Locations of Monitor Wells at LESB.



Resource Recovery

H053-182726

AI, 4-1

D.E.R.

VIA CERTIFIED MAIL

December 4, 1991

DEC 5 1991

SOUTHWEST DISTRICT  
TAMPA

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Bill Crawford, Hazardous Waste

Re: Laidlaw Environmental Services of Bartow, FLD980729610  
Importation of hazardous waste from Grand Bahamas

Dear Mr. Crawford;

On October 15, 1991, a notice was sent to the Department advising of our intent to import waste methylene chloride, acetone, and methanol from a generator in Freeport, Grand Bahamas Islands, as well as incinerator ash destined for the secure landfill in Pinewood, SC. U.S. Customs at the proposed port of entry (Ft. Lauderdale) wants written documentation from the Department that these shipments are done with the knowledge and consent of the State of Florida. In order to facilitate this transaction, we request that the Department provide a letter to Laidlaw Environmental Services of Bartow stating that the FDER is aware of and consents to the importation of these wastes into the state as described in our October 15 correspondence.

If you have any questions, please contact me.

Sincerely,

Steve Taylor  
Safety and Compliance Manager

ST/drs  
1980A

691

December 3, 1991

HC53-182726

AI, 4-1°

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Bill Crawford, Waste Management

Re: Laidlaw Environmental Services of Bartow, FLD980729610  
Groundwater Monitoring

Dear Mr. Crawford;

I have enclosed copies of the facility's groundwater monitoring results for 1990 and 1991, for your review prior to our meeting to discuss this matter. We would like to meet next week, if possible, so that we can go forward with whatever actions need to be taken on this matter. If you have any questions, please contact me.

Sincerely,

*Steve Taylor*

Steve Taylor  
Safety and Compliance Manager

ST/drs

cc: Ashley Chadwick  
Barbara Hamilton  
Lin Longshore  
Paul Manak  
Jim Green

D. E. R.

DEC 4 1991

SOUTHWEST DISTRICT  
TAMPA

1977A

Data in AI, 4-1°



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

To: Rick Garrity

Thru: Bill Kutash *WR 12/6/91*

From: Bill Crawford *WC*

Date: December 6, 1991

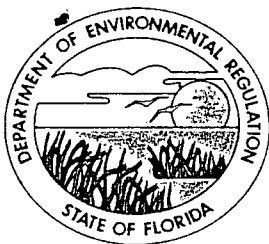
Subject: Laidlaw Environmental Services of Bartow , FLD 980 729 610  
Operating Permit HO53-182726

Laidlaw Environmental Services of Bartow (LESB) , formerly Tricil Environmental Services, submitted this operating permit application on June 6, 1991. The review process included a notice of deficiency and several meetings with the facility. This permit, for the storage of hazardous waste in containers and tanks and the physical blending of hazardous waste fuels, addresses the operation of the LESB facility as they currently exist.

The notice of intent to issue was published on September 27, 1991. The company has established the appropriate financial instruments and no petitions were received on the notice.

I recommend issuance of this permit.

*issued permit in 4-h*



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

4053-182726

10 September 1991

AT. 7-10

Mr. Paul Manak  
Laidlaw Environmental Services  
170 Bartow Municipal Airport  
Bartow, FL 33830-9504

Mr. Manak:

We are processing the Hazardous Waste Transfer Facility Notification for Laidlaw Environmental Services received by the Department on September 4th.

I am returning the \$100 check that was enclosed with the notification. There is no application fee associated with notifying as a hazardous waste transfer facility.

If you have any questions, please call me at 904/488-0300.

Sincerely,

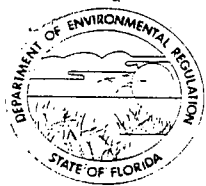
*Linda Lakes*

Linda Lakes  
Hazardous Waste Regulation Section

/ll  
Enclosure

cc: Bill Crawford, SW District  
Steve Taylor, LES





State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: VICTOR SAN AGUSTIN

H1053-182726

AT, 4i

FROM: Linda Lakes <sup>ll</sup>  
Hazardous Waste Compliance & Enforcement

DATE: 10 September 1991

SUBJECT: Transfer Facility Notification  
Transporter: *Laidlaw Environmental Services (FLD 980 729 610)*  
Location: *170 Bartow Municipal Airport, Bartow, FL*

The transporter named above has submitted a Transfer Facility Notification form (DER Form 17-730.900(6)) to the Department. A copy of the notification form is attached.

If you have any objections to approving this facility as a transfer facility, please send your comments to me within twenty (20) days.

Thank you for your assistance. If you have any questions, please call me at SC 278-0300.

/11

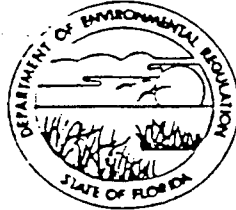
Attachment

291



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 17-30.071(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-30.171. All information must be typed or printed clearly.

I. Transporters Identification:

Company Name Laidlaw Environmental Services of Bartow, Inc.

EPA ID No. FLD 980729610

Company Mailing Address 170 Bartow Municipal Airport  
Bartow, FL 33830-9504

Principal Contact Steve Taylor

Phone Number (813) 533-6111

II. Transfer Facility Identification:

Name of Facility Laidlaw Environmental Services of Bartow, Inc.

Street Address 170 Bartow Municipal Airport  
Bartow, FL 33830-9504

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

County Polk

Storage Volume 81,180 gallons (covered) 35,3430 gallons (uncovered)

III. Certification:

I CERTIFY UNDER PENALTY OF LAW THAT THE ABOVE INFORMATION IS ACCURATE, AND COMPLETE. AS THE OWNER OR OPERATOR OF THE ABOVE REFERENCE HAZARDOUS WASTE TRANSFER FACILITY, I AM AWARE THAT THIS FACILITY MUST COMPLY WITH THE REQUIREMENTS OF FLA. ADMIN. CODE RULE 17-30.171.

Paul W. Manak  
PRINT/TYPE NAME

Facility Manager  
TITLE

Paul W. Manak  
SIGNATURE OF AUTHORIZED REPRESENTATIVE

8/30/91  
DATE SIGNED

Please complete this form and mail to the following address:

Department of Environmental Regulation  
Hazardous Waste Section  
2600 Blair Stone Road  
Tallahassee, Florida 32301

~~AI, 2-2~~  
AI, 4-2  
J.E.R.

VIA CERTIFIED MAIL

August 27, 1991

SEP 3 1991

SOUTHWESTERN AIRPORT  
TAMPA

Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Attention: Linda Lakes

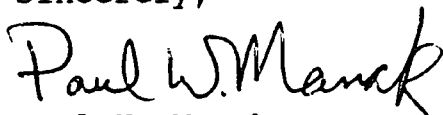
Re: Laidlaw Environmental Services of Bartow, Inc.  
FLD 980729610  
Request to operate as a hazardous waste transfer facility

Dear Ms. Lakes;

The Laidlaw Environmental Services of Bartow, Inc. facility herein requests authority to operate the facility at 170 Bartow Municipal Airport, Bartow, Florida, as a hazardous waste transfer facility in order to hold certain wastes for up to ten days. The facility has already notified as a transporter of hazardous wastes, and is currently permitted as a storer of hazardous wastes (#H053 - 86011A). As a permitted facility, the requirements of F.A.C. 17-730.171, specifically 17-730.171(2)(a) - Subparts B, C, D, and I of 40 CFR 265 have been met. The facility also has a written closure plan in compliance with F.A.C. 17-730.171(2)(b) and 40 CFR 265.111, 112, 114, and 115.

Attached is completed Form 17-730.900(6) as application, along with a check in the amount of \$100.00. If you have any questions, please contact me or Steve Taylor at (813) 533-6111.

Sincerely,



Paul W. Manak  
Facility Manager

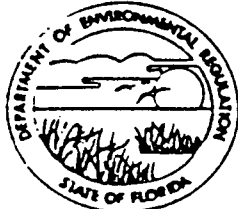
PWM/drs

cc: Steve Taylor, LES  
Ashley Chadwick, LES  
Barbara Hamilton, LES  
Bill Crawford, FDER, Tampa

1613A

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2500 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 17-30.071(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-30.171. All information must be typed or printed clearly.

I. Transporters Identification:

Company Name Laidlaw Environmental Services of Bartow, Inc.

EPA ID No. FLD 980729610

Company Mailing Address 170 Bartow Municipal Airport  
Bartow, FL 33830-9504

Principal Contact Steve Taylor

Phone Number (813) 533-6111

II. Transfer Facility Identification:

Name of Facility Laidlaw Environmental Services of Bartow, Inc.

Street Address 170 Bartow Municipal Airport  
Bartow, FL 33830-9504

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

County Polk

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III. Certification:

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Paul W. Manak Facility Manager  
PRINT/TYPE NAME TITLE

Paul W. Manak 8/30/91  
SIGNATURE OF AUTHORIZED REPRESENTATIVE DATE SIGNED

Please complete this form and mail to the following address:

Department of Environmental Regulation  
Hazardous Waste Section  
2600 Blair Stone Road  
Tallahassee, Florida 32301

TRICIL RECOVER SERVICES, INC. 07-86

1109

IMPRES. ACCOUNT

AVE. D, NORTH, RT. 3, BOX 249  
BARTOW MUNICIPAL AIRPORT  
BARTOW, FLORIDA 33830-9504

63-526 056  
631

August 30

19 91

PAY  
TO THE  
ORDER OF Florida Dept. of Environmental Regulations

\$ 100.00

One Hundred Dollars\*\*00/100\*\*

DOLLARS



Sun First National Bank  
of Polk County  
Bartow Office 056  
255 West Main St., Bartow, FL 33830

FOR Application Fee

*Deborah Simpson*

⑈001109⑈ ⑆063105269⑆0056000303585⑈

## LAIDLAW (Bartow)

#1053-182726

Page 2.

FF-02/86

## CHRONOLOGICAL ENTRY FORM FOR FOLDERS

NO.	DATE	TO	FROM	REFERENCE
1 93	Jan	R. Garrity DER - TPA	P. Mandk LAIDLAW	Modification approval requested
2 93	Jan 27	A. Farmer EPA	M. Behel LAIDLAW	Request for permit termination
3 93	April 12	R. Garrity DER - TPA	M. Behel LAIDLAW	Waste minimization program certification
4 93	April 16	L. Milanian DER - TPA	M. Behel LAIDLAW	Class 1 Permit modification request
5 93	April 19	S. Kastury DER - Tallah	L. Milanian DER - TPA	FYI - see 3/93
6 93	April 19	A. Farmer EPA	M. Behel LAIDLAW	Class 1 modification to HSWA Permit request
7 93	April 29	S. Kastury DER - Tallah	L. Milanian DER - TPA	FYI - see 4/93
8 93	May 5	R. Evans DER - TPA	L. Milanian DER - TPA	Examine attached modification for completeness
9 93	June 11	R. Evans DER - TPA	M. Behel LAIDLAW	Revised drawing for tanks T-101 to T-110
10 93	July 23	File	—	Meeting attendees
11 93	July 9	M. Behel LAIDLAW	R. Evans DER - TPA	Review copy of draft permit
12 93	Aug 12	M. Behel LAIDLAW	R. Evans DER - TPA	Review revised draft permit
13 93	Aug 23	M. Russell DER - Tallah	D. Davis DER - Tallah	Permit mod. fee for facility
14 93	Aug 24	M. Russell DER - Tallah	D. Davis DER - Tallah	Mod. fee depends upon review required
15 93	Aug 30	R. Evans DER - TPA	M. Behel LAIDLAW	Concerns of draft permit mod.
16 93	Oct 11	M. Behel LAIDLAW	G. Santhi DER - TPA	Comments on tank thickness test results
17 93	Oct 28	G. Santhi DER - TPA	M. Behel LAIDLAW	Tank thickness testing report
18 93	Oct 28	M. Behel LAIDLAW	J. Andrews Jacobs Engineering	Response to FDEP regarding tank thickness calculations
19 93	Nov 1	L. Milanian DER - TPA	M. Behel LAIDLAW	Requested items for modification
20 93	Nov 23	L. Milanian DER - TPA	M. Behel LAIDLAW	Paint can crusher info will be submitted at later date
21 93	Dec 1	S. Kastury DER - Tallah	R. Evans DER - TPA	FYI - minor permit modifications (see 1/93)
22 93	Dec 10	S. Kastury DER - Tallah	L. Milanian DER - TPA	FYI - Permit modification for useage of can crusher
23 93	Dec 23	R. Garrity DER - TPA	M. Behel LAIDLAW	Waste minimization program certification
24 94	FEB 3	LRM depmp	M. BEHEL LAIDLAW	Class 1 permit mod for can crushers
25 94	FEB 3	LRM depmp	M. BEHEL LAIDLAW	re-submittal of DEC 2, 1993 package
26 94	FEB 10	C. Taylor LAIDLAW	R. PATE DER Tall.	Financial is OK
27 94	FEB 10	B. Knauss depmp	LRM depmp	what do you think of 24/94
28 94	FEB 10	File		TRANSFER FACILITY NOTIFICATION FORM
29 94	FEB 28	M. Behel LAIDLAW	LRM depmp	need more info on can crushers
30 94	MAR 1	EMAIL		LAIDLAW has 2 options on 24/94
31 94	Mar 18	Beth Knaws	Mark Behel	Vacuum Still Equipment Replacement.
32 94	<del>Mar 18</del>	<del>San Agustin</del>	<del>Mark Behel</del>	<del>Class I permit Mod request dated May 2 and Sperry Cor.</del>
Correspondence continued file 4-j				

## CHRONOLOGICAL ENTRY FORM FOR FOLDERS

NO.	DATE	TO	FROM	REFERENCE
1		L. LAKES	P. MANAK	
91	Sept 3	der tall	Laidlaw	notice of transfer. Station
2	Sept 10	V. SAN AGUSTIN L. LAKES	der tall	Fyi copy of 1/91
3	Sept 10	P. MANAK	L. LAKES	Procuring 1/91
4	Dec 2	B. Crawford	S. Taylor	found trace. continues in the crew
91	Dec 4	B. Crawford	S. Taylor	all GWM results for 1990 and 1991
5	Dec 5	B. Crawford	S. Taylor	Provide letter acknowledging international ship
91	Dec 6	R. Garrity	B. Crawford	Permit is ready for issuance
6	Dec 10	Paul Manak	W. Crawford	must need some corrective action on GWM
91	Dec 11	P. MANAK	W. Crawford	approval of waste, importation
7	Feb 27	W. Crawford	S. Taylor	minimum wall thickness for 5 tanks
91	Mar 2	S. Kestery	B. Crawford	Fyi copy of 10/92
8	Mar 23	G. Miller	B. Crawford	comments on proposed own crusher
91	May 5	S. Kestery	B. Crawford	request for minor modification
9	May 16	A. Farmer	S. Taylor	Excess Hand Collection tank
10	June 8	C. Taylor	L. Clark	Financial is ok
91	June 24	S. Kestery	A. Farmer	Shimmi frame had no further action
11	July 2	E. Jenkins	L. Clark	Arrangement to trust fund
91	June 22	A. Farmer	S. Taylor	Problem with process unit 2
12	Aug 13	Gle	L. Milanian	Modification was approved. Ann Coed. never
91	July 24	B. Kraus	S. Taylor	tank wall is trapping
13	Sept 10	G. Smith	P. Manak	Contrary to Plan update
91	Sept 8	S. Kestery	L. Milanian	Fyi Laidlaw request to extend HCV
14	Sept 21	P. Manak	R. Garrity	copy of warning letter regarding (HVER)
91	Oct 5	G. Dumbuck	P. MANAK	Part package on tank R-203 now fit for use
15	Oct 16	P. Manak	L. Milanian	Part package not yet approved
91	Oct 27	S. Kestery	L. Milanian	Fyi copy of 24/92
16	Oct 30	Gle		Notice of Oct 30th meeting
91	Nov 17	LMM	P. MANAK	Status of TANK R-203 & minor mod. request
17	Nov 16	S. Kestery	LMM	Fyi copy of 28/92
91	Nov 12	D. Milanian	P. Manak	Request for minor modification of permit
18	Nov 17	P. Manak	R. Garrity	Notification by Dept that TCLP to be managed in accordance, permit
91	Nov 25	P. Manak	L. Milanian	Certification for continued use of Tank R-203
19	Nov 23	R. Garrity	L. Milanian	Modifications to permit
91		DER - TPA	DER - TPA	