

## Memorandum

## Florida Department of Environmental Protection

TO: Satish Kastury  
Administrator, Tallahassee

FROM: Bill Crawford, District Engineer, Tampa  
Hazardous Waste Regulation *WCC*

DATE: September 11, 1997

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit Application HO53-292488*  
*Revised Application*

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Attached are documents dated August 21, 1997 and submitted August 25, 1997 which are part of the operating permit renewal revised application.

This package includes:

1. One page cover letter submitting the revised pages of the application.
2. Revised page of the application.

Attachment

cc: Narindar M. Kumar, Chief RCRA Branch, EPA/REGION 4

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*revised pages  
added to application*

Certified Mail Receipt Number P 544 820 062

August 21, 1997

RECEIVED  
AUG 25 1997  
D E P

Mr. Bill Crawford  
Permitting Engineer  
Division Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

RE: Revisions to RCRA Permit Renewal Application  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610

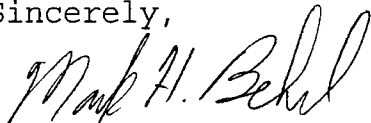
Dear Mr. Crawford:

As discussed in our voice mail exchanges on August 21, 1997, the Section, Township and Range designation in LESB's Part 1 RCRA permit applications are not correct. The Part 1 portions of these applications are; Chapter one for the operating permit, and Appendix G for the construction permit.

Enclosed are four copies of each page. Appendix A contains the pages for Chapter One of the operating permit application, and Appendix B contains the pages for Appendix G in the construction permit application.

If you have any questions or need additional information regarding the application, feel free to call me at (941) 519-6328.

Sincerely,



Mark H. Behel  
Regulatory Compliance Manager

enclosures:

pc: Mike Merashoff  
Bob Fox

## Memorandum

## Florida Department of Environmental Protection

TO: Satish Kastury  
Administrator, Tallahassee

FROM: Bill Crawford, District Engineer, Tampa *WCL*  
Hazardous Waste Regulation

DATE: April 22, 1997

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit Application HO53-292488*  
*Revised Application*

Attached are documents dated April 17, 1997 and submitted April 21, 1997 which are part of the operating permit renewal revised application.

This package includes:

1. One page cover letter submitting the revised pages of the application and describing how Laidlaw responded to each item of the 2<sup>nd</sup> NOD dated March 18, 1997.
2. Revised pages of the application.

Attachment

cc: Narindar M. Kumar, Chief RCRA Branch, EPA/REGION 4

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*File 5-c*  
*13/97*

Next Day UPS Air # N143 0225 45 4

April 17, 1997

Mr. Bill Crawford  
Permitting Engineer  
Division of Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619



RE: Second Notice of Deficiencies Response  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610  
Permit Number HO53-292488

Dear Mr. Crawford:

On March 20, 1997, LESB received your second Notice of Deficiencies (NOD) dated March 18, 1997. Each of your NOD comments are presented below along with LESB's response:

## APPENDIX 1.F

FDEP Comment 1

Page F-2 Paragraph 2 was modified to direct inquiries about the filter process to Section F-1.5. This cross reference appears to belong in the third paragraph. Paragraph three describes the use of portable pumps and filters in the filtration process. Are these filters the basket filters in the fuels blend and storage tank areas? These baskets do not appear to be portable.

LESB Response

The cross reference has been moved to the third paragraph. The filters used in the solids filtering process are portable and not the same as those in the fuels blending and storage tank areas.

A revised page F-2 is enclosed.

## CHAPTER 2

## FDEP Comment 2

Page 2-3 Section 2.3.2 paragraph 1 mentions 'lab pack acceptance procedures'. Are these LESB processing requirements or regulatory requirements and where are they identified? Does this paragraph describe the physical process of managing lab packs by LESB personnel?

### LESB Response

The section has been revised for better clarity. The lab pack procedures mentioned are the guidelines discussed in Section 2.3.2 where the process of managing lab packs are discussed (e.g. bulking).

A revised page 2-3 is enclosed.

FDEP Comment 3

Page 2-8 Paint can sampling - The LESB response to this question indicates that the waste stream will receive more analytical review than specified in Section 2.5.3.3. Please revise either section 2.3.3 or 2.5.3.3 to reflect (in a single location) the characterization of this material.

LESB Response

A new section 2.5.3.4 has been added to clarify the paint waste sampling procedures.

Revised pages 2-8 and 2-9 are enclosed.

CHAPTER 6

FDEP Comment 4

Page 6-5 The first paragraph indicates the coordination agreements have been distributed to various local agencies. Section 6.2.2 also indicates that coordination agreements have been distributed to various local agencies and that these agreements are maintained at the facility. Neither section indicates that executed agreements will be maintained at the facility. Please revise the application to indicate that executed agreements will be maintained at the facility.

LESB Response

Section 6.2.2 has been revised to include "executed agreements".

A revised page 6-5 is enclosed.

CHAPTER 9

FDEP Comment 5

Page 9-2 Section 9.5.1 items 10 and 15 indicate that 36 wipe tests will be taken. Page 10-2, Steps 9-16 includes the cost of 34 samples. Please revise the application to eliminate the inconsistency.

LESB Response

The inconsistency has been eliminated (note that the number of analyses differs from the number of samples due to the QA/QC analysis).

A revised page 10-2 is enclosed.

FDEP Comment 6

Page 9-5 Section 9.5.2 items 8 and 15 indicate 21 wipe samples will be taken. Page 10-3, Steps 1-16 include the cost of 25 wipe samples. Please revise the application to eliminate the inconsistency.

LESB Response

The inconsistency has been eliminated (note that the number of analyses differs from the number of samples due to the QA/QC analysis).

A revised page 10-3 is enclosed.

FDEP Comment 7

Page 9-5 Section 9.5.2 item 19 indicates that 4 core samples will be taken. Page 10-3, Steps 1-16 include the cost of 10 soil samples. Please revise the application to eliminate the inconsistency.

LESB Response

The inconsistency has been eliminated (note that the number of analyses differs from the number of samples due to the QA/QC analysis).

**A revised page 10-3 is enclosed.**

FDEP Comment 8

Page 9-8 Section 9.6, item 11 indicates that 24 wipe samples will be taken. Page 10-3, Steps 1-12 include the cost of 25 wipe samples. Please revise the application to eliminate the inconsistency.

LESB Response

The inconsistency has been eliminated (note that the number of analyses differs from the number of samples due to the QA/QC analysis).

**A revised page 10-3 is enclosed.**

FDEP Comment 9

Page 9-8 Section 9.6, item 17 indicates that 12 wipe samples will be taken. Page 10-3, Steps 13-18 include the cost of 26 wipe samples. Please revise the application to eliminate the inconsistency.

LESB Response

The inconsistency has been eliminated (note that the number of analyses differs from the number of samples due to the QA/QC analysis).

**A revised page 10-3 is enclosed.**

CHAPTER 10

FDEP Comment 10

The closure cost estimate does not make it clear that the cost to transport the waste and decontamination fluids off-site are included. Please revise the text and/or the cost estimate to include the cost of transportation.

LESB Response

These costs do include transportation and Section 10.1 has been revised to indicate such.

**A revised page 10-1 is enclosed.**

FDEP Comment 11

Page 10-4 The cost of detergent for the fuels blend appears to be 50% of the cost of detergent for the container and tank areas. Please explain the difference.

LESB Response

The costs should have been the same and has been changed to reflect such.

**A revised page 10-4 is enclosed.**

FDEP Comment 12

Page 10-5 The total for Section 9.7.1 Should be \$11920 instead of \$8920.

LESB Response

The total has been change to \$11,920.

**A revised page 10-5 is enclosed.**

FDEP Comment 13

Page 10-5 Section 9.7.2 the labor for the lab tech should be \$175 instead of \$140.

LESB Response

The value has been changed to \$175.

**A revised page 10-5 is enclosed.**

CHAPTER 11

FDEP Comment 14

Page 11-1 Paragraph 1 describes the concrete slab as providing an effective impermeable base, and has been revised to indicate that a sealant was added during construction. Please provide documentation that supports the revised statement.

LESB Response

As discussed in our 3/21/97 meeting, the Container Storage Building was constructed before LESB purchased it. The contractor does not have the "as built" drawings of the building but has indicated to LESB that the sealer was applied at the time of construction. See Attachment D for a record of the conversation.

**There were no revisions as a result of this response.**

FDEP Comment 15

Page 11-2 Paragraph 1 calculates the volume of liquid (number of containers) per row. The eighth line should be revised (for clarity) as follows '...26 (13 pallets double stacked) ...'.

LESB Response

The eighth line has been revised for clarity, as requested.

**A revised Page 11-2 is enclosed.**

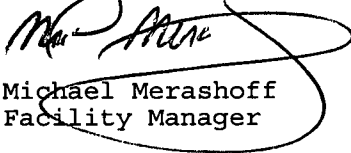
Below is a list of the enclosures and an explanation of each:

1. A list of the pages in the application which have been revised. There are two categories of revised pages. One is the pages which have revised information included on them. The other category is pages which have no revised information on them but some of the old information from a previous page was shifted onto them making them differ from those dated 12/31/96. This information is included in Attachment A.
2. One set of revised pages highlighting the revisions is included in Attachment B. The additions are indicated with computer shading and the deletions are indicated with a strikeout line through them.
3. Four complete sets of revised pages (no highlighting) are included as Attachment C.

4. Attachment D is a record documenting two conversations with Hammer Construction in response to comment #14.

If you have any questions or need additional information regarding the application, feel free to call me or Mark Behel at (941) 533-6111.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Merashoff", is written over the typed name and title.

Michael Merashoff  
Facility Manager

enclosures:

pc: Mark Behel  
Lin Longshore  
Dave Roehm



**ATTACHMENT A**

REVISED PAGES/DRAWINGS

F-2  
F-7  
2-1  
2-3  
2-7  
2-8  
2-9  
6-5  
Figure 6.10  
10-1 to 10-6  
Attachment 10.2-2  
Attachment 10.2-3  
11-2  
15-1  
15-3  
15-7  
Figure 15.2

PAGES WITH INFORMATION  
SHIFTED ONTO THEM

2-2  
2-4  
2-5  
2-6  
2-10  
2-11  
15-2  
15-4  
15-5

**ATTACHMENT D**

**M E M O R A N D U M**

TO: File

FROM: Mark H. Behel *MB*

RE: Telephone Conversation With Marvin Hammer  
Hammer Construction Company  
Bartow, FL

DATE: December 4, 1996

On today's date I spoke with Marvin Hammer of Hammer Construction Company in Bartow, FL. I explained to him I had been informed that his company constructed the LESB existing Container Storage Building and asked him to confirm that information. He replied that his company did actually construct the building. I then asked him if he recalled whether or not the concrete floor in the building was constructed with a sealer. He replied that a concrete curing agent and sealer was added to the concrete floor making it impervious. I asked him if he had any drawings or other documentation of the floor being sealed. He said he did not retain any documentation of such.

**M E M O R A N D U M**

TO: File

FROM: Mark H. Behel *MHB*

RE: Second Telephone Conversation With Marvin Hammer  
Hammer Construction Company  
Bartow, FL

DATE: March 25, 1997

On today's date I spoke with Marvin Hammer of Hammer Construction Company in Bartow, FL. As a follow-up to our December 4, 1996 telephone conversation, I asked him if the concrete curing agent and sealer which was added to the concrete floor in the existing Container Storage Building, making it impervious, was added to the concrete mix or added to the surface of the concrete floor? He said it was added to the surface of the floor.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

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

March 18, 1997

Re: *Laidlaw Environmental Services of Bartow, FLD 980 729 610*  
*Operating Permit No. HO53-292488*  
*Second Notice of Deficiencies*

Dear Mr. Behel:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application as revised by letter dated January 3, 1997, and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

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

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

The responses made by Laidlaw Environmental Services to each item shall be as noted in Section 62-730.220(5), F.A.C., which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

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

Four copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you have any questions, please call me at 813-744-6100, ext. 372.

Sincerely,



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

cc: Narindar Kumar, EPA Region IV  
Satish Kastury, Administrator, FDEP -- Tallahassee  
Mike Starks, ERM-South, Tampa

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***Attachment A***  
***Second Notice of Deficiencies***

**Appendix 1.F**

Page F-2 Paragraph 2 was modified to direct inquires about the filter process to section F-1.5. This cross reference appears to belong in the third paragraph. Paragraph three describes the use of **portable** pumps and **filters** the filtration process. Are these filters the basket filters in the fuel blend and storage tanks areas?. These basket filters did not appear to be portable.

**Chapter 2**

Page 2-3 Section 2.3.2 paragraph 1 mentions 'lab pack acceptance procedures'. Are these LESB processing requirements or regulatory agency requirements and where are they identified? Does this paragraph describe the physical process of managing lab packs by LESB personnel?

Page 2-8 Paint can sampling - The LESB response to this question indicates that the waste stream will receive more analytical review than specified in Section 2.5.3.3. Please revise either Section 2.3.3 or 2.5.3.3 to reflect (in a single Location) the characterization of this material.

**Chapter 6**

Page 6-5 The first paragraph indicates that coordination agreements have been distributed to various local agencies. Section 6.2.2 also indicates that coordination agreements have been distributed to various local agencies and that these agreements are maintained at the facility. Neither section indicates that **executed agreements** will be maintained at the facility. Please revise the application to indicate that executed agreements will be maintained at the facility.

**Chapter 9**

Page 9-2 Section 9.5.1 items 10 and 15 indicate that 36 wipe samples will be taken. Page 10-2 Steps 9-16 includes the cost of 34 wipe samples. Please revise the application to eliminate the inconsistency.

Page 9-5 Section 9.5.2 items 8 and 15 indicate that 21 wipe samples will be taken. Page 10-3 Steps 1-16 include the cost of 25 wipe samples. Please revise the application to eliminate the inconsistency.

Page 9-5 Section 9.5.2 item 19 indicate that 4 core samples will be taken. Page 10-3 Steps 1-16 include the cost of 10 soil samples. Please revise the application to eliminate the inconsistency.



Page 9-8 Section 9.6 item 11 indicate that 24 wipe samples will be taken. Page 10-3 Steps 1-12 include the cost of 25 wipe samples. Please revise the application to eliminate the inconsistency.

Page 9-8 Section 9.6 item 17 indicate that 12 wipe samples will be taken. Page 10-3 Steps 13-18 include the cost of 26 wipe samples. Please revise the application to eliminate the inconsistency.

## **Chapter 10**

The closure cost estimate does not make it clear that the cost to transport the waste and decontamination fluids offsite are included. Please revise the text and/or the cost estimate to include the cost of transportation,

Page 10-4 The cost of detergent for the fuel blend are appears to be 50% of the cost of detergent for the container and tank areas. Please explain the difference.

Page 10-5 The total for Section 9.7.1 should be \$11920 instead of \$8920.

Page 10-5 Section 9.7.2 the labor for the lab tech should be \$175 instead of \$140.

## **Chapter 11**


Page 11-1 Paragraph 1 describes the concrete slab as providing an effective impermeable base, and has been revised to indicate that a sealant was added during construction. Please provide documentation that supports the revised statement.

Page 11-2 Paragraph 1 calculates the volume of liquid (number of containers) per row. The eight line should be revised (for clarity) as follows '...26 (13 pallets double stacked)...'.

## Memorandum

## Florida Department of Environmental Protection

TO: Satish Kastury  
Administrator, Tallahassee

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

DATE: January 6, 1997

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit Application HO53-292488*  
*Revised Application*

---

Attached are documents dated January 3, 1997 and submitted January 6, 1997 which are part of the operating permit renewal revised application.

This package includes:

1. One page cover letter submitting the revised pages of the application and describing how Laidlaw responded to each item of the 1<sup>st</sup> NOD dated October 23, 1996.
2. Revised pages of the application.

Attachment

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

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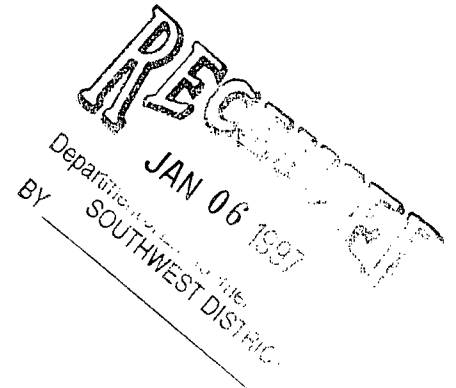


file 5-c  
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97

Next Day UPS Air # 0920 9333 758

January 3, 1997

Mr. Bill Crawford  
Permitting Engineer  
Division of Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619



RE: First Notice of Deficiencies Response  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610  
Permit Number HO53-292488

Dear Mr. Crawford:

On October 24, 1996, LESB received your Notice of Deficiencies (NOD) dated October 23, 1996. Each of your NOD comments are presented below along with LESB's response:

**APPENDIX 1.F**

**FDEP Comment 1**

Page F-1 The last sentence of the fourth paragraph indicates that the can crusher will be cleaned at the end of each day. Please define the "end of the day", is it calendar day, work day, or the end of the time when the can crusher is used?

**LESB Response**

Each Calendar day of use is the cleaning schedule.

**A revised Page F-1 has been enclosed.**

**FDEP Comment 2**

Page F-2 The third paragraph mentions the solid filtration process. The application should include a more detail description of this activity.

**LESB Response**

The solids filtering process is discussed in Section F-1.5. Section F-1.5 has been revised.

**Revised Pages F-2 and F-6 have been enclosed.**

**FDEP Comment 3**

Page F-3 The third paragraph indicates that containers will meet DOT specifications. What specifications are referenced, and are they still utilized in describing containers (performance standards versus specifications)?

**LESB Response**

Updated DOT standards are actually termed "performance standards" instead of the previous term "specification".

**Page F-3 has been revised to reflect the change in terminology and is enclosed.**

FDEP Comment 4

Page F-7 The first paragraph talks about two tanks that could be equipped with steam and agitators. Have these tanks been equipped with these items, and if not, under what circumstance would the items be added?

LESB Response

The tanks referenced are R-202 and R-203. They are equipped with steam jackets. The steam supply lines are not presently connected to the jackets. Tank R-202 is currently equipped with an agitator. The circumstances under which the steam supply would be connected and/or the second agitator are dependent on the particular waste placed in those tanks and the need for such equipment.

**Page F-7 has been revised and enclosed to reflect the above.**

FDEP Comment 5

The location of the stored roll-off containers should be indicated on the site plan.

LESB Response

The site plan (Appendix A) has been revised and enclosed to indicate the three possible locations of the roll-off containers.

APPENDIX 1.G

FDEP Comment 6

Page G-7 The hazardous waste listing for P015 is intended for powder only. Please describe why this waste code is applicable for metal only.

LESB Response

The note has been deleted and a revised page G-7 is enclosed.

CHAPTER 2

FDEP Comment 7

Page 2-1 The third paragraph appears to be a run on sentence. The paragraph should be reviewed and revised as necessary.

LESB Response

The run-on sentence has been corrected and a revised page 2-1 is enclosed.

FDEP Comment 8

The fourth paragraph indicates that the generator will submit a Material Profile Sheet. What assistance is provided by Laidlaw Environmental Services (LES) in the preparation of this form? How is waste Composition determined without analysis?

LESB Response

LESB personnel assist hazardous waste generators with their Material Profile Sheets using the information provided by the generator. However, it is the responsibility of the generator to properly classify their waste stream(s). The generator may use analysis and/or their knowledge of a waste stream in the composition determination. LES personnel will ask for analysis when it appears the generator does not have adequate knowledge to properly classify their waste.

**There were no changes to the application pages for this response.**

FDEP Comment 9

The fourth paragraph indicates that a determination on LESB's ability to treat a waste will be made based upon the MPS. The application should identify the job title of the personnel that will make this determination, and include the required training.

LESB Response

These job titles have been added to the fourth paragraph.

**A revised Page 2-1 is enclosed.**

FDEP Comment 10

Page 2-2 The first Paragraph the line has a typographical error. It appears to should be too.

LESB Response

"To" has been changed to "too".

**A revised Page 2-2 is enclosed**

FDEP Comment 11

The second paragraph should include a description of a representative sample for containers and bulk shipments.

LESB Response

A description of a representative sample has been added to this paragraph. Also the reference to Section 2.5.2 has been changed to correctly reflect Section 2.5.3.

**A revised page 2-2 is enclosed.**

FDEP Comment 12

The fifth paragraph mentions lab pack acceptance procedures. Whose procedures are they and what are they?

LESB Response

Lab pack procedures were previously in Section 2.3.1 along with other information. Section 2.3.1 has been divided into Sections 2.3.1 and 2.3.2. The new lab pack section is Section 2.3.2. The previous Section 2.3.2 has been changed to Section 2.3.3.

**Revised pages 2-2 and 2-3 are enclosed.**

FDEP Comment 13

The last sentence of the fifth paragraph states that mandatory analysis of lab packs prepared by LESB personnel is not required. Later discussion on lab packs prepared by others does not mention analysis. The discussion of inventory and analysis for lab packs should be revised to be consistent throughout the application.

LESB Response

The work "analysis" has be changed to correctly read "review".

**A revised page 2-3 is enclosed.**

FDEP Comment 14

Page 2-3 The third paragraph mentions sampling a "portion" of the paint can containers. Please describe what constitutes a portion and how will this portion be determined?

LESB Response

The method used to determine the "portion" is described in Section 2.5.3.3. The incorrect section (Section 2.5.2.3) was referenced and has been changed to reference the correct Section 2.5.3.3.

**A revised page 2-3 is enclosed.**

FDEP Comment 15

Section 2.3.2 describes the processing of bulk shipments. A discussion of the sampling procedures for bulk shipments should be included.

LESB Response

Section 2.3.2 has been renumbered to Section 2.3.3 in response to comment 12. In Section 2.3.3 a reference has been added to the bulk sampling procedures, which are in Section 2.5.3.2.

**A revised page 2-3 is enclosed.**

FDEP Comment 16

The fifth paragraph mentions a representative sample. The application should describe how a representative sample is defined by LESB.

LESB Response

See response to FDEP Comment 11. Also the words "after receipt" have been added.

**A revised page 2-3 is enclosed.**

FDEP Comment 17

The fifth paragraph mentions "...the waste". The application should describe this term as used by LESB.

LESB Response

The word "stream" has been added. As described in Section 2.2, a "waste stream" is a particular stream of waste identified by a single Material Profile Sheet (MPS).

**A revised page 2-3 is enclosed.**

FDEP Comment 18

The application indicates that some analytical procedures will be performed on an "...as necessary or as needed" basis. The waste analysis plan should describe how LESB defines basis of necessity.

LESB Response

A more detailed explanation of the terms "as needed" and "as necessary" has been added.

**A revised page 2-4 is enclosed.**

FDEP Comment 19

Page 2-4 The second paragraph states that pH is used to verify the hazardous waste nature of the material. The application should be revised to clearly indicate that pH is not the only parameter that determines the regulatory status of a material.

LESB Response

A reference to "D002" has been added. **A revised page 2-4 is enclosed.**

FDEP Comment 20

Page 2-6 The second paragraph states "...samples will be taken by personnel who have been properly trained...". The training plan does not include any reference to the type of training that will be given to samplers. The application should clearly describe the training given to these personnel.

LESB Response

The training plan (Chapter 8) has been modified to include sampler's training.

**A revised page 8-2 has been enclosed.**

FDEP Comment 21

Item 1 of Section 2.5.3.1 mentions "...each waste stream". the application should clearly identify what LESB means by this term.

LESB Response

As described in Section 2.2, a "waste stream" is a particular stream of waste identified by a single Material Profile Sheet (MPS). See response to Comment 17.

**There were no changes to the application pages for this response.**

FDEP Comment 22

Item 3 of Section 2.5.3.1 states that sample tubes will be pre-rinsed with the material to be sampled. Please describe the disposal of the pre-rinse.

LESB Response

A statement has been added indicating the pre-rinse will be place back into the container from which it was taken.

**A revised page 2-6 is enclosed.**

FDEP Comment 23

Page 2-7 Item 2 of Section 2.5.3.2 describes wiping the outside of sample tubes. The application should describe the disposal of the contaminated wipes.

LESB Response

A statement has been added that disposable wipes will be disposed of as hazardous waste and wipes suitable for laundering should be collected for such.

**A revised page 2-7 is enclosed.**

FDEP Comment 24

Item 5 of Section 2.5.3.2 describes a label prepared by a sampler. Is this a sample label, if so, the application should describe the procedures used to link the sample to the container.

LESB Response

The sample will be linked to the container by the container number. "Container number" has been added to Section 2.5.3.2.

**A revised page 2-8 is enclosed.**

#### FDEP Comment 25

Item 2 of Section 2.5.3.3 describes the collection of a sample from paint cans. A sample taken following the described procedures would produce a sample of 1% of the paint cans. The sampling procedure should be revised to increase this number to 10%.

#### LESB Response

Section 2.5.3.3 indicate the stated percentages of the incoming containers of paint waste which will be sampled. Section 2.3.2 indicates that every accumulation container of paint waste will be sampled after it is collected into the accumulation drum, therefore all paint waste will be sampled.

**There were no changes to the application pages for this response.**

#### CHAPTER 3

##### FDEP Comment 26

Page 3-1 The sixth paragraph describes the emergency response responsibilities of the off-duty hours security inspector. The training plan must include appropriate instructions for this inspector.

#### LESB Response

The training plan (Chapter 8) has been modified to include training for the off-duty security personnel.

**A revised Page 8-3 has been enclosed.**

#### CHAPTER 4

##### FDEP Comment 27

The inspection Checklists as shown are incomplete. The inspection checklists should be revised to include the name of the inspector as the inspector's initials are not sufficient.

#### LESB Response

A place for the inspector's name has been added to the inspection checklists.

**Revised Figures 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, and 4.7 are enclosed.**

#### CHAPTER 6

##### FDEP Comment 28

General Paul Manak is listed as an emergency coordinator. FDEP understands that Mr. Manak is no longer employed at LESB. The emergency coordinator list should be revised to reflect current individuals.

#### LESB Response

Figure 6.1 has been updated.

**A revised Figure 6.1 is enclosed.**

##### FDEP Comment 29

Page 6-2 Paragraph 4 describes the activation of emergency notification systems. Are there different signals for the types of emergencies that might be encountered at LESB? The application should describe any different signals.



LESB Response

At this time, there is only one signal sound given by the emergency notification system.

**There were no changes to the application pages for this response.**

FDEP Comment 30

Page 6-3 The application should include the State Warning Point Number 904-488-1320 for all notifications that do not occur between 8 AM and 5 PM, Monday to Friday non-holidays.

LESB Response

The 904-488-1320 number is 24 hour number. "8 am to 5 pm, non-working days and non-holidays" has been added in reference to the 813-744-6100 number.

**A revised page 6-3 is enclosed.**

FDEP Comment 31

Page 6-4 The first paragraph indicates that coordination agreements have been distributed to various local agencies. The application should indicate the execution of the agreement and the maintenance of a completed agreement at the facility.

LESB Response

Section 6.2.2, which is referenced in the first paragraph, indicates these agreements are maintained at the facility.

**There were no changes to the application pages for this response.**

FDEP Comment 32

The second paragraph indicates that LESB employees will perform some aspects of the clean-up after a spill, fire or explosion. The training plan should describe the additional training to be received by these individuals.

LESB Response

The training plan (Chapter 8) has been modified to include training for personnel involved in clean-up activities.

**A revised page 8-2 has been enclosed.**

FDEP Comment 33

Page 6-4 Item 2 discusses the discharge of material to the Bartow POTW. The application must discuss the records to be maintained (amount of material, test results, discharge records, notice to POTW), how long the records will be maintained and where the records are to be maintained.

LESB Response

A statement has been added to Item 2 indicating these records will be maintained in the operating record for three years.

**A revised page 6-4 is enclosed.**

FDEP Comment 34

Page 6-9 Section 6.5.2 states that "...will be cleaned up promptly...". The application should describe what promptly means to LESB.

LESB Response

"Promptly" has been deleted and a time frame of 4 hours has been added.

A revised Page 6-<sup>9</sup>~~4~~ is enclosed.

FDEP Comment 35

The Third Bullet indicates that liquids in the perimeter road sump can be pumped directly into a storage tank. The application should indicate the presence of hard piping or the use of a portable pump.

LESB Response

The use of a portable pump has been added.

A revised page 6-9 is enclosed.

FDEP Comment 36

Section 6.5.3 states that the container storage building has an "...Impervious concrete floor...". The application should indicate what steps LESB has taken to seal the concrete initially, and the steps followed to maintain the sealant.

LESB Response

The word "impervious" has been deleted from this section and this discussion is contained in Chapter 11. See response to comment number 59.

A revised page 6-10 is enclosed.

FDEP Comment 37

Page 6-10 Section 6.5.4 discusses releases from tanks resulting from breaches or over fills. The application should discuss the potential releases that occur during transfer operations (hose failure, coupling failures, flange leaks, etc.).

LESB Response

Section 6.5.4 has been revised to include this information.

A revised page 6-10 is enclosed

FDEP Comment 38

The second paragraph in Section 6.5.4 discusses the identification of the material that has been released. Section 6.5.3 does not include a discussion of how spilled material from containers will be identified. The application should be revised to indicate how responders will be able to identify spills and releases.

LESB Response

Section 6.5.3 has been revised to include this information.

A revised page 6-10 is enclosed

FDEP Comment 39

The fourth paragraph in Section 6.5.4 describes the isolation of a tank that is being fed. The application should describe the isolation of a tank that is being used as a source of material.

LESB Response

Section 6.5.4 has been revised to include this information. A revised page 6-10 is enclosed

FDEP Comment 40

Page 6-11 Section 6.5.5 describes responding to leaks from overhead piping. This discussion should include steps to stop the flow into the pipe.

LESB Response

Section 6.5.5 has describes responding to leaks from overhead piping. This discussion includes steps to stop the flow into the pipe.

**A revised 6-11 is enclosed.**

FDEP Comment 41

Section 6.6, paragraph 2 of Item 1 describes the operation of the automatic gate. The application should describe testing the automatic function of the gate and the retention of the test results.

LESB Response

Chapter 8 has been modified to include testing of the automatic gate.

**A revised page 8-3 has been enclosed.**

FDEP Comment 42

Figure 2 - Authorization To Commit Funds. This form is signed by Paul Manak who is no longer employed by LESB. This form must be signed by a corporate officer of vice president level or higher who is authorized to sign permit applications.

LESB Response

Figure 6.2 has been updated.

**A revised Figure 6.2 is enclosed**

CHAPTER 7

FDEP Comment 43

Page 7-1 Section 7.1 describes the procedures, structures and equipment associated with the unloading of containers from trucks. The application should include a similar discussion for unloading bulk tankers.

LESB Response

These unloading procedures are described in Section 12.3.1 of Chapter 12. A reference to Section 12.3.1 has been added to the text of Section 7.1.

**A revised page 7-1 is enclosed.**

FDEP Comment 44

Page 7-3 Section 7.4 implies that the valves associated with facility processing will fail closed during a power outage. Are there any processes that could be adversely affected by the valves closing during processing?

LESB Response

Engineering reviews of the plant processes have shown adverse affects should not be produced by these valves.

**There were no changes to the application pages for this response.**

## **CHAPTER 8**

### **FDEP Comment 45**

Page 8-1 The third paragraph describes the training of new employees. This paragraph should also discuss emergency response training that an individual occupying a new position might need to properly respond to an emergency.

### **LESB Response**

A reference to training new employees, before they perform any duties, on how to properly respond to emergencies has been added.

**A revised page 8-1 is enclosed**

### **FDEP Comment 46**

Page 8-2 The third paragraph identifies the facility trainer and how they will remain abreast of the knowledge needed by facility operators. The trainer should be required to review the site contingency plan prior to conducting the annual refresher.

### **LESB Response**

The paragraph has been revised to state the trainer will review the facility's Contingency Plan before each annual training session.

**A revised page 8-3 is enclosed.**

### **FDEP Comment 47**

Page 8-3 The second paragraph describes unannounced practice drills. The application should describe what records will be maintained of the exercises and where the records will be maintained.

### **LESB Response**

A description of the records to be kept is included.

**A revised page 8-3 is enclosed.**

## **CHAPTER 9**

### **FDEP Comments 48-56**

The FDEP requested that LESB present the closure plan as a set of unit closure plans which track the closure of a specific unit from start to finish.

### **LESB Response**

LESB has accommodated the Department's request and modified the Closure Plan so that it is a set of unit closure plans which track the closure of a specific unit from start to finish. LESB has included in the new Closure Plan the requested information by the FDEP in comments 48-56.

## **CHAPTER 10**

Chapter 10 has also been modified to accommodate the changes from Chapter nine. This was necessary because the cost estimates for each step in Chapter 9 is cross referenced in Chapter 10. However, LESB has addressed the two comments (numbers 57-58) relative to the amount of water used and the number of tanks in the modified chapter.

## **CHAPTER 11**

### **FDEP Comment 59**

Page 11-1 Paragraph 1 describes the concrete slab as providing an effective impermeable base. Please include a description of the features that make the concrete impermeable.

### **LESB Response**

When constructed, the concrete had added to it a concrete curing agent and sealer making it impermeable.

**A revised page 11-1 is enclosed.**

### **FDEP Comment 60**

The last paragraph includes a note regarding the stacking of containers three high. The application should describe the additional equipment that is required and the facility's plans to install this equipment.

### **LESB Response**

The request for triple stacking has been deleted.

**Revised pages 11-1 to 11-4 have been enclosed.**

### **FDEP Comment 61**

Page 11-3 The drawings provided do not include sufficient detail to evaluate the secondary containment calculations. The application should include drawings that provide construction details and dimensions.

### **LESB Response**

Figure 11.2 has been included and reference to such.

**A revised page 11-2 has been included**

### **FDEP Comment 62**

Page 11-4 The first paragraph indicates that spilled or leaked material will be removed as necessary. The application should specify the time frame (or describe the decision process to determine when) to remove the material.

### **LESB Response**

The application has been revised to state within 24 hours.

**A revised page 11-3 has been enclosed.**

### **FDEP Comment 63**

Section 11-3 the first paragraph indicates that all pallets will be moved with an appropriate forklift. The application should include the specifications that LESB requires for an appropriate forklift.

### **LESB Response**

The application has been revised to reference the required OSHA standard.

**A revised page 11-4 has been enclosed.**

### **FDEP Comment 64**

Section 11-3 the second paragraph states that the roll-off containers will generally contain solids and not liquids. The application should specify the conditions under

which the roll-offs will contain liquids, and how the operating records will reflect the presence of liquids.

LESB Response

The application has been revised to clarify when liquids would be in a roll-off.

**A revised page 11-4 has been enclosed.**

CHAPTER 16

FDEP Comment 65

Page 16-2 Paragraph one is confusing. Wastes received from a generator on a manifest is manifested. Mistakes or errors on the manifest do not alter the fact that the waste was manifested. The application should be revised to discuss material that might be transported using an alternate tracking document (Bill of Lading, shipping papers, etc.).

LESB Response

"Manifest" has been changed to "shipping paper".

**A revised page 16-2 is enclosed**

FDEP Comment 66

Paragraph one appears to have a typographical error. Quality should apparently be qualify.

LESB Response

"Quality" has been changed to "qualify".

**A revised page 16-2 is enclosed.**

Below is a list of the enclosures and an explanation of each:

1. A list of the pages in the application which have been revised. There are two categories of revised pages. One is the pages which have included on them revised information. The other is pages which have no revised information on them but some of the old information from a previous page was shifted onto them making them differ from those dated 7/25/96. This information is included in Attachment A.
2. One set of revised pages highlighting the revisions is included in Attachment B. The additions are indicated with computer shading and the deletions are indicated with a strikeout line through them.
3. Four complete sets of revised pages (no highlighting) are included as Attachment C.

If you have any questions or need additional information regarding the application, feel free to call me or Mark Behel at (941) 533-6111.

Sincerely,

  
David J. Roehm  
Facility Manager

enclosures:

pc: Mark Behel  
Lin Longshore



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

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

November 20, 1996

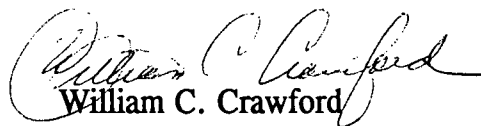
Re: ***Laidlaw Environmental Services of Bartow, FLD 980 729 610***  
***Operating Permit No. HO53-292488***  
***Request for Revised Submittal Due Date for Response to First NOD***

Dear Mr. Behel:

The Florida Department of Environmental Protection (FDEP) has received your request dated November 5, 1996, to revise the first NOD response due date from November 25, 1996 to January 6, 1997. Based upon the information provided in your request, and the complexity of the NOD, your request is approved.

Should you have any questions, please feel free to contact me at 813-744-6100 ext 372.

Sincerely,



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

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

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

Printed on recycled paper.

File 5-c  
8 / 96

Certified Mail Receipt # P 453 479 134

November 5, 1996

Mr. Bill Crawford  
Permitting Engineer  
Division Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

D.E.P.  
NOV 08 1996  
SOUTHWEST DISTRICT  
TAMPA

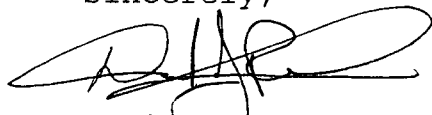
RE: Extension Request  
First Notice of Deficiencies Response  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610  
Permit No. HO53-292488

Dear Mr. Crawford:

During our meeting on November 4, 1996, we discussed the Notice of Deficiencies (NOD) dated October 23, 1996 referenced above. Based on our conversation, an extension to the November 25, 1996 due date will be needed in order to provide the FDEP with the desired response. Considering the number of holidays in the coming weeks, LESB is requesting an extension until Monday January 6, 1997 for the due date of the NOD response.

Thank you very much for your consideration in this matter. If you have any questions or need additional information regarding the request, feel free to call me or Mark Behel at (941) 533-6111.

Sincerely,



David J. Roehm  
Facility Manager

pc: Mark Behel  
Lin Longshore

file S-c

7/96







# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

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

October 23, 1996

Re: ***Laidlaw Environmental Services of Bartow, FLD 980 729 610***  
***Operating Permit No. HO53-292488***  
***First Notice of Deficiencies***

Dear Mr. Behel:

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

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

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

The responses made by Laidlaw Environmental Services to each item shall be as noted in Section 62-730.220(5), F.A.C., which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

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

Laidlaw Environmental Services, Bartow  
First Notice of Deficiency, HO53-292488  
October 23, 1996

Four copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you have any questions, please call me at 813-744-6100, ext. 372.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Crawford", is written over the printed name.

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

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

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***Attachment A***  
***First Notice of Deficiencies***

**Appendix 1.F**

Page F-1      The last sentence of the fourth paragraph indicates that the can crusher will be cleaned at the end of each day. Please define the "end of the day", is it calendar day, work day, or the end of the time when the crusher is used?

Page F-2      The third paragraph mentions the solid filtration process. The application should include a more detail description of this activity.

Page F-3      The third paragraph indicates that containers will meet DOT specifications. What specifications are referenced, and are they still utilized in describing containers (performance standards versus specifications)?

Page F-7      The first paragraph talks about two tanks that could be equipped with steam and agitators. Have these tanks been equipped with these items, and if not, under what circumstance would the items be added?

The location of the stored roll-off containers should be indicated on the site plan.

**Appendix 1.G**

Page G-7      The hazardous waste listing for P015 is intended for powder only. Please describe why this waste code is applicable for metal only.

**Chapter 2**

Page 2-1      The third paragraph appears to be a run on sentence. The paragraph should be reviewed and revised as necessary.

The fourth paragraph indicates that the generator will submit a Material Profile Sheet. What assistance is provided by Laidlaw Environmental Services in the preparation of this form? How is waste composition determined without analysis?

The fourth paragraph indicates that a determination on LESBs ability to treat a waste will be made based upon the MPS. The application should identify the job title of the personnel that will make this determination, and include the required training.

Page 2-2      The first paragraph the seventh line has a typographical error. It appears that *to* should be *too*.

The second paragraph should include a description of a representative sample for containers and bulk shipments.

The fifth paragraph mentions lab pack acceptance procedures. Whose procedures are they and what are they?

The last sentence of the fifth paragraph states that mandatory analysis of lab packs prepared by LESB personnel is not required. Later discussion on lab packs prepared by others does not mention analysis. The discussion of inventory and analysis for lab packs should be revised to be consistent throughout the application.

Page 2-3      The third paragraph mentions sampling a "portion" of the paint can containers. Please describe what constitutes a portion and how will this portion be determined.

Section 2.3.2 describes the processing of bulk shipments. A discussion of the sampling procedures for bulk shipments should be included?

The fifth paragraph mentions a "representative" sample. The application should describe how a representative sample is defined by LESB.

The fifth paragraph mentions "...the waste." The application should describe this term as used by LESB.

The application indicates that some analytical procedures will be performed on an "...as necessary or as needed" basis. The waste analysis plan should describe how LESB defines basis of necessity.

Page 2-4      The second paragraph states that pH is used to verify the hazardous waste nature of the material. The application should be revised to clearly indicate that pH is not the only parameter that determines the regulatory status of a material.

Page 2-6      The second paragraph states "...samples will be taken by personnel who have been properly trained..". The training plan does not include any reference to the type of training that will be given to samplers. The application should clearly describe the training given to these personnel.

Item 1 of Section 2.5.3.1 mentions "... each waste stream". The application should clearly identify what LESB means by this term.

Item 3 of Section 2.5.3.1 states that sample tubes will be pre-rinsed with the material to be sampled. Please describe the disposal of the pre-rinse.

Page 2-7 Item 2 of Section 2.5.3.2 describes wiping the outside of sample tubes. The application should describe the disposal of the contaminated wipes.

Item 5 of Section 2.5.3.2 describes a label prepared by the sampler. Is this a sample label, if so, the application should describe the procedures use to link the sample to the container.

Item 2 of Section 2.5.3.3 describes the collection of a sample from paint cans. A sample taken following the described procedures would produce a sample of 1% of the paint cans. The sampling procedure should be revised to increase this number to 10%.

### Chapter 3

Page 3-1 The sixth paragraph describes the emergency response responsibilities of the off-duty hours security inspector. The training plan must include appropriate instruction for this inspector.

### Chapter 4

The Inspection Checklists as shown are incomplete. The inspection checklists should be revised to include the name of the inspector as the inspectors initials are not sufficient.

### Chapter 6

General Paul Manak is listed as an emergency coordinator. FDEP understands that Mr. Manak is no longer employed at LESB. The emergency coordinator list should be revised to reflect current individuals.

Page 6-2 Paragraph 4 describes the activation of emergency notification systems. Are there different signals for the types of emergencies that might be encountered at LESB? The application should describe any different signals.

Page 6-3 The application should include the State Warning Point number <sup>800-320-0519</sup> ~~904-488-1320~~ for all notifications that do not occur between 8 AM and 5 PM, Monday to Friday non-holidays.

Page 6-4 The first paragraph indicates that coordination agreements have been distributed to various local agencies. The application should indicate the execution of the agreement and the maintenance of a completed agreement at the facility.

The second paragraph indicates that LESB employees will perform some aspects of the clean-up after a spill, fire or explosion. The training plan should describe the additional training to be received by these individuals.

Page 6-4 Item 2 discusses the discharge of material to the Bartow POTW. The application must discuss the records to be maintained (amount of material, test results, discharge records, notice to POTW), how long the records will be maintained and where the records are to be maintained.

Page 6-9 Section 6.5.2 states that "...will be cleaned up promptly...". The application should describe what promptly means to LESB.

The third bullet indicates that liquids in the perimeter road sump can be pumped directly into a storage tank. The application should indicate the presence of hard piping or the use of a portable pump.

Section 6.5.3 states that the container storage building has an "...impervious concrete floor...". The application should indicate what steps LESB has taken to seal the concrete initially, and the steps followed to maintain the sealant.

Page 6-10 Section 6.5.4 discusses releases from tanks resulting from breaches or over fills. The application should discuss the potential releases that occur during transfer operations (hose failure, coupling failures, flange leaks, etc.).

The second paragraph in Section 6.5.4 discusses the identification of the material that has been released. Section 6.5.3 does not include a discussion of how spilled material from containers will be identified. The application should be revised to indicate how responders will be able to identify spills and releases.

The fourth paragraph in Section 6.5.4 describes the isolation of a tank that is being fed. The application should describe the isolation of a tank that is being used as a source of material.

Page 6-11 Section 6.5.5 describes responding to leaks from overhead piping. This discussion should include steps to stop the flow into the pipe.

Section 6.6 paragraph 2 of item 1 describes the operation of the automatic gate. The application should describe testing the automatic function of the gate and the retention of the test results.

Figure 2-Authorization To Commit Funds. This form is signed by Paul Manak who is no longer employed by LESB. This form must be signed by a corporate officer of vice president level or higher who is authorized to sign permit applications.

## **Chapter 7**

Page 7-1      Section 7.1 describes the procedures, structures and equipment associated with the unloading of containers from trucks. The application should include a similar discussion for unloading bulk tankers.

Page 7-3      Section 7.4 implies that the valves associated with facility processing will fail closed during a power outage. Are there any processes that could be adversely effected by the valves closing during processing?

## **Chapter 8**

Page 8-1      The third paragraph describes the training of new employees. This paragraph should also discuss emergency response training that an individual occupying a new position might need to properly respond to an emergency.

Page 8-2      The third paragraph identifies the facility trainer and how they will remain abreast of the knowledge needed by facility operators. The trainer should be required to review the site contingency plan prior to conducting the annual refresher.

Page 8-3      The second paragraph describes unannounced practice drills. The application should describe what records will be maintained of these exercises and where the records will be maintained.

## **Chapter 9**

### **General Comments:**

The closure plan is presented as a sequence of events (Sections), and presents the activities at each unit as a subsection. The tracking of necessary events at a given unit is difficult. The application should present the closure plan as a set of unit closure plans. These unit plans should track the closure of the unit from start to finish, and describe all the activities related to the closure of that unit.

The closure plan for the container storage area and the fuels blend area did not appear to address decontamination of the walls. The application should include decontamination of a height of wall equivalent to the height of stacked containers in the storage area. Additionally, the closure plan for the fuel blending area must address decontamination of the entire walls and ceiling.



The closure plan does not appear to address decontamination of the loading and unloading ramp or the area north of the container storage building and prior to fuel blending area, that is used to manage containers during transportation. Decontamination of these areas must be addressed in the application.

Page 9-4      Section 9.7.1 should include an inspection of the slabs for cracks, and sampling of the soils below any cracks that are detected.

Page 9-6      This page could not be located.

Page 9-7      Decontamination of the perimeter road is mentioned briefly in Section 9.7.3. The application indicates that some samples will be taken to verify the need for decontamination. The area associated with truck loading and unloading areas and the perimeter road collection sump should be included in the sampling plan. The cost associated with these samples must be included in the closure cost estimate.

Page 9-8      Item 6 describes the removal of contaminated soils. The closure plan should include conformity samples below any excavation.

Page 9-9      Section 9.7.4.2 item 2 states that samples from the outside of the building will not be required, and gives several reasons. The closure plan should be revised to include soil sampling around the collection sump of the secondary containment trench for the container storage building.

Page 9-10     Section 9.7.5 describes the disposal of miscellaneous equipment. The management of these items should be addressed as worst case scenario (LESB is out of business). Additionally, the management of the decontaminated tanks is not discussed here or elsewhere in the plan, and a discussion similar to the one for miscellaneous equipment should be included in the application.

## Chapter 10

Page 10-2     The application indicates on page 10-2, that 2 drums or 110 gallons of clean water rinse water will be generated in step 9.7.1.5. Please justify any value below 4 gallons per square foot.

Page 10-4     Section 9.7.2 Steps 1-3 specifies a total of 15 storage tanks to be decontaminated, but identifies the location of 14. Step 4 indicates the sampling from 14 tanks. The application should be revised to eliminate this inconsistency.

## Chapter 11

Page 11-1 Paragraph 1 describes the concrete slab as providing an effective impermeable base. Please included a description of the features that make the concrete impermeable.

The last paragraph includes a note regarding the stacking of containers three high. The application should describe the additional equipment that is required and the facility's plans to install this equipment.

Page 11-3 The drawings provided do not include sufficient detail to evaluate the secondary containment calculations. The application should include drawings that provide construction details and dimensions.

Page 11-4 The first paragraph indicates that spilled or leaked material will be removed as necessary. The application should specify the time frame (or describe the decision process to determine when) to remove the material.

Section 11-3 the first paragraph indicates that all pallets will be moved with an appropriate forklift. The application should include the specifications that LESB requires for an appropriate forklift.

Section 11-3 the second paragraph states that the rolloff containers will generally contain solids and not liquids. The application should specify the conditions under which the rolloffs will contain liquids, and how the operating records will reflect the presence of liquids.

## Chapter 16

Page 16-2 Paragraph one is confusing. Waste received from a generator on a manifest is manifested. Mistakes or errors on the manifest do not alter the fact that the waste was manifested. The application should be revised to discuss material that might be transported using an alternate tracking document (Bill of Lading, shipping papers, etc.).


Paragraph one appears to have a typographical error. *Quality* should apparently be *qualify*.

## Memorandum

## Florida Department of Environmental Protection

---

TO: Satish Kastury  
Administrator, Tallahassee

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

DATE: August 19, 1996

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit Application H053-292488*  
*Revised Application*

---

Attached are documents dated August 18, 1996 and submitted August 19, 1996 which are part of the operating permit renewal revised application.

This package includes:

1. One page cover letter submitting the revised application.
2. 2 inch 3 ring binder containing the revised application.

Please note that the facility has requested the return of the documents previously submitted on July 26, 1996.

Attachment

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

WCC



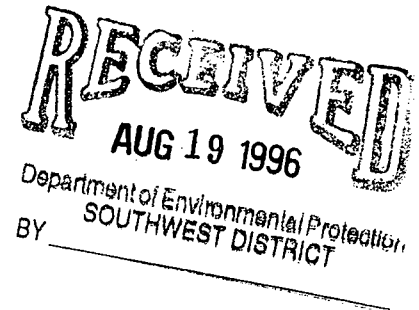
lesb6.doc

File 5-C  
4 / 96

Hand Delivered By Mark Behel

August 18, 1996

Mr. Bill Crawford  
Permitting Engineer  
Division Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619



RE: Revisions to RCRA Permit Renewal Application  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610  
Old Permit Number HO53-182726A

Dear Mr. Crawford:

On July 25, 1996, LESB submitted four copies of the RCRA Renewal Permit Application. These copies included information concerning the proposed additional Container Storage Building. As discussed in our telephone conversation, on August 9, 1996, the construction of the new warehouse will be delayed. The FDEP requested that LESB submit a revised RCRA Renewal Application without the references to the additional Container Storage Building. Four copies of the revised application are enclosed.

Also attached to the July 25, 1996 submittal were the completed FDEP checklists, which indicated the page numbers where the listed information is located. These checklists are the same for both applications.

At your convenience, please return the four copies of the application submitted on July 25, 1996 to LESB.

Please be aware that the revised construction permit application will be submitted to the FDEP on or before August 28, 1996. If you have any questions or need additional information regarding the application, feel free to call me at (941) 533-6111.

Sincerely,

A handwritten signature in cursive script that reads "Mark H. Behel".

Mark H. Behel  
Regulatory Compliance Manager

enclosures:

pc: Paul Manak  
Larry Walker (w/o enclosure)

Lin Longshore  
Bob Fox

File 5-c

3 / 96

## Memorandum

## Florida Department of Environmental Protection

TO: Satish Kastury  
Administrator, Tallahassee

FROM: Bill Crawford, District Engineer, Tampa  
Hazardous Waste Regulation *WCC*

DATE: July 26, 1996

SUBJECT: *Laidlaw Environmental Services (Bartow), FLD 980 729 610*  
*Operating Permit Application HO53-292488*

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Attached are documents dated July 25, 1996 and submitted July 26, 1996 which are part of the operating permit renewal application.

This package includes:

1. One page cover letter submitting the application.
2. 3 inch 3 ring binder containing the application.

Attachment

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

WCC



lesb6.doc

*File 5-c*  
*2/96*

Federal Express Next Day Air # 143 2066 291

July 25, 1996

Mr. Bill Crawford  
Permitting Engineer  
Division Waste Management  
Southwest District  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

D.E.P.  
JUL 26 1996  
SOUTHWEST DISTRICT  
TAMPA

RE: RCRA Permit Renewal Application  
Laidlaw Environmental Services of Bartow, Inc. (LESB)  
EPA ID No. FLD 980 729 610  
Old Permit Number HO53-182726A

Dear Mr. Crawford:

Enclosed are four copies of the above mentioned permit application. Also attached are the completed FDEP checklists which indicate the page numbers where the listed information is located.

As was discussed in our meeting on July 18, 1996 and subsequent telephone call on July 19, 1996, the enclosed operating permit application contains information concerning the construction of the additional Container Storage Building. Also, as discussed, the information concerning the addition is, at this time, limited. Therefore, it is realized that the first NOD will contain significant comments regarding the information required for the warehouse addition. Finally, as discussed, LESB will request an extension to the response timeframe issued with the first NOD in order to supply "as built" drawings of the new Container Storage Building.

Please be aware that the revised construction permit application will be submitted to the FDEP on or before August 28, 1996. If you have any questions or need additional information regarding the application, feel free to call me at (941) 533-6111.

Sincerely,

*Mark H. Behel*

Mark H. Behel  
Regulatory Compliance Manager

*document stored on shelf  
as attachment 5-a*

enclosures:

pc: Paul Manak  
Lin Longshore  
Larry Walker (w/o enclosures)

*File 5-c  
1/96*

## Permit Correspondence Page 1 Vol 1 (5-c)

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