

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

FROM: Lynne R. Milanian, District Engineer, Tampa  
Hazardous Waste Regulation *Lynne 9/22*

DATE: September 22, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610  
Operating Permit File No. HO53-182726  
Notice of Minor Modifications

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Attached are documents dated September 9, 1992 and submitted September 10, 1992 which are subject to the noted permit.

This package details:

1. One cover letter indicating that the contingency plan has been updated.
2. One revision log.
3. One list of emergency coordinators.
4. One authorization letter.

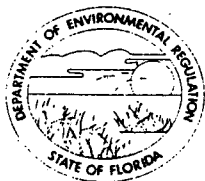
Please add these revisions to your active application.

lrm

Attachment

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

lesbtran.doc



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

FROM: BILL CRAWFORD *WC*

DATE: FEBRUARY 11, 1992

SUBJECT: LAIDLAW ENVIRONMENTAL SERVICES (BARTOW), FLD 980 729 610  
OPERATING PERMIT APPLICATION HO53-182726  
REVISIONS TO THE CONTINGENCY PLAN AND INSPECTION SCHEDULES

ATTACHED PLEASE FIND THE SUBMITTAL DATED DECEMBER 23, 1991 AND SUBMITTED DECEMBER 24, 1991 AND FEBRUARY 11, 1992. PLEASE INSERT THE REVISED PAGES INTO THE APPROPRIATE PLACES IN THE APPLICATION.

C.C. ALAN FARMER EPA/REGION IV

January 17, 1992

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

Re: Laidlaw Environmental Services of Bartow, Inc. FLD 980729610  
Groundwater Monitoring

Dear Mr. Crawford;

Polk County Environmental Services maintains a rainfall monitoring station at the Bartow Airport. The monthly rainfall totals as recorded by them for 1991 are as follows:


<u>Month</u>	<u>Rainfall (inches)</u>
January	2.85
February	0.83
March	5.43
April	3.49
May	4.87
June	9.21
July	18.23
August	6.74
September	1.66
October	2.99
November	0.27
December	<u>0.50</u>
Total	57.07

Rainfall recorded at the airport in 1990 totaled 44.10 inches, a 29% increase this past year over the previous year.

Also, as requested in your December 10, 1991, letter attached are Material Safety Data Sheets for the driveway crack sealing material.

If you have any other questions, please contact me.

Sincerely,



Steve Taylor  
Safety and Compliance Manager

cc: Paul Manak, LES, Bartow  
Ashley Chadwick, LES, Antioch  
James Kutzman, USEPA, Region IV  
Satish Kastury, FDER, Tallahassee

MATERIAL KOP-COAT, INC.  
SAFETY  
DATA  
SHEET

PRODUCT EMERGENCIES: 800-548-0489  
OUTSIDE U.S.A.: 412-227-2700  
PRODUCT INFORMATION: 800-547-2469

KOP-COAT, INC.  
436 SEVENTH AVENUE  
PITTSBURGH, PA. 15219

CHEMTREC ASSISTANCE: 800-424-9300  
CANUTEC: 613-996-6666

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### SECTION I - PRODUCT IDENTIFICATION

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PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

COMMODITY NUMBER: 52203501

SYNONYM: Coal tar epoxy

PRODUCT USE: Industrial coating

CHEMICAL FAMILY: Coal tar

FORMULA: Mixture

CAS NUMBER: None

DOT PROPER SHIPPING NAME: Paint

DOT HAZARD CLASS: Flammable liquid

UN/NA NUMBER: UN 1263

CANADIAN PRODUCT CLASSIFICATION: Class D, Division 2, Subdivision A: Very Toxic Material

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### SECTION II - HEALTH/SAFETY ALERT

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CHRONIC OVEREXPOSURE (as defined by OSHA recommended standards)

MAY CAUSE CANCER

WARNING

Comp A - Flammable Liquid; Comp B - Combustible Liquid

HAZARDOUS TO THE SKIN, OR IF INHALED OR SWALLOWED

CAUSES EYE AND SKIN IRRITATION

MAY BE FATAL OR CAUSE BLINDNESS IF SWALLOWED

CANNOT BE MADE NON-TOXIC

AVOID PROLONGED AND/OR REPEATED CONTACT

OBSERVE GOOD HYGIENE AND SAFETY PRACTICES WHEN HANDLING THIS PRODUCT

DO NOT USE THIS PRODUCT UNTIL MSDS HAS BEEN READ AND UNDERSTOOD

WARNING: THIS PRODUCT CONTAINS A CHEMICAL KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER.

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### SECTION III - HEALTH HAZARD INFORMATION

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EYE: Overexposure to vapor can result in irritation and/or corneal changes. Direct eye contact may cause irritation. Contact with heated material may cause thermal burns.

SKIN: Contact with skin can result in irritation which when accentuated by sunlight may result in phototoxic skin reaction. Repeated and/or prolonged contact may cause more serious skin disorders including cancer. Contact with heated material may cause thermal burns.

PRODUCT NAME: Ditumastic 300M Black or Red (Component A and B)

PAGE 1A

INHALATION: Overexposure to vapor may result in respiratory tract irritation. Repeated and/or prolonged contact to high concentrations of vapor may result in respiratory difficulties, central nervous system (CNS) effects and possible cardiovascular collapse. Prolonged and/or repeated inhalation of high concentrations of metal fumes may cause metal fume fever characterized by headache, dizziness, metallic taste in mouth, coughing and general influenza-type symptoms.

INGESTION: Ingestion of material is unlikely, but may cause gastrointestinal disturbances including irritation, nausea, vomiting, abdominal pain and in extreme cases cardiovascular involvement. Aspiration of this material may lead to chemical pneumonitis, which may be fatal. Absorption may cause blindness.

OTHER: See Section XII (Comments) for additional information on health effects.

REVISION DATE: 02/89

SPECIFICATION SHEET NUMBER: 10/09/85(WJK)

COMMODITY NUMBER: 52203501

CODE NUMBER: CTG000C4FE8911

REPLACES SHEET: CTG000C4FE8910

SUPPLIER INFORMATION: Same as manufacturer.

PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

PAGE 2

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SECTION IV - EMERGENCY AND FIRST AID PROCEDURES

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EYE CONTACT: Immediately flush with large amounts of water for 15 minutes. Immediately seek medical aid.

SKIN CONTACT: Wash thoroughly with soap and water or waterless hand cleaner. For contact with molten product, do not remove contaminated clothing. Flush skin immediately with large amounts of cold water. If possible, submerge area in cold water. Pack with ice. Seek medical aid.

INHALATION: Remove from exposure. If breathing has stopped or is difficult, administer artificial respiration or oxygen as indicated. Seek medical aid.

INGESTION: If victim is conscious and alert, give 1-2 glasses of water or milk. Induce vomiting using ipecac syrup as directed on the label. After vomiting, the victim may be given a slurry of 100 g of activated charcoal in 8 oz. of water.

NOTE TO PHYSICIAN: Possible aspiration hazard. Emesis or gastric lavage is indicated because this product contains methanol.

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SECTION V - FIRE AND EXPLOSION HAZARD INFORMATION

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FLASH POINT & METHOD SEE SECTION XII AUTOIGNITION TEMP: ND

FLAMMABLE LIMITS (% BY VOLUME/AIR): LOWER: 1% UPPER: 7%

TDG FLAMMABILITY CLASSIFICATION: None

EXTINGUISHING MEDIA: Use dry chemical, carbon dioxide, foam or water spray. Water or foam may cause frothing, if molten.

FIRE-FIGHTING PROCEDURES: Wear complete fire service protective equipment, including full-face MSHA/NIOSH approved self-contained breathing apparatus. Use water to cool fire-exposed container/structure/protect personnel. Toxic vapors may be given off in a fire.

FIRE AND EXPLOSION HAZARDS: When heated (fire conditions), vapors/decomposition products may be released forming flammable/explosive mixtures in air. Closed containers may explode when exposed to extreme heat (fire). Vapors are heavier than air and may travel along the ground, pit or sewer line to some distant source of ignition and flash back.

SENSITIVITY TO MECHANICAL IMPACT: ND

SENSITIVITY TO STATIC DISCHARGE: ND

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SECTION VI - SPILL, LEAK AND DISPOSAL INFORMATION

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SPILL OR LEAK PROCEDURES (PRODUCT): Stop leak if no risk involved. Stay upwind. Contain or solidify spills. Shovel into dry containers and cover. Flush area with water. Small spills: Take up with sand or other noncombustible absorbent material. Flush area with water. Dike large spills for later disposal. Contain runoff from fire control and dilution water. This product released into the environment must be reported to the National Response Center (1 800-424-8802). When this product is spilled or leaked, the reportable quantity is 100 lbs. or more.

PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

PAGE 2A

## ----- DOT REPORTABLE QUANTITIES -----

1000 lbs. Xylene

WASTE DISPOSAL: This product is a US EPA defined ignitable hazardous waste. Dispose of as an ignitable hazardous waste in accordance with local, state and federal regulations. If disposing in a state other than California, dispose of as an industrial waste in accordance with local, state, and federal regulations. This product contains coal tar, which has been determined by IARC to be a carcinogen. According to California hazardous waste regulations, substances posing a hazard to human health because of carcinogenicity are hazardous wastes. Dispose of as a hazardous waste in the state of California.

PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

PAGE 3

## SECTION VII - RECOMMENDED EXPOSURE LIMIT/HAZARDOUS INGREDIENTS

EXPOSURE LIMIT (PRODUCT): \* For coal tar pitch volatiles, OSHA-PEL is 0.2mg/m3 averaged over an 8 hour work shift, benzene soluble fraction. The ACGIH-TLV is 0.2mg/m3.

\*\*Xylene (ACGIH-STEL) 150 ppm; 655 mg/m3

\*\*\*Methanol (ACGIH-STEL) 250 ppm; 310 mg/m3

\*\*\*\*None established

\*\*\*\*\*respirable dust

HAZARDOUS INGREDIENTS	CAS NUMBER	PERCENT	EXPOSURE LIMIT (PPM;MG/M3)
Coal Tar Pitch	65996-93-2	20-25	*
Xylene**	1330-20-7	10-15	ACGIH-TLV 100 435 OSHA-PEL 100 435
Polyamide-amine Resin		5-10	****
Methyl Alcohol***	67-56-1	1-3	ACGIH-TLV 200 260 OSHA-PEL 200 260
Iron Oxide fume, as Fe	1309-37-1	20-25	ACGIH-TLV 2 5 OSHA-PEL - 10
Bisphenol A/Epichlorohydrin Resin	25068-38-6	19-24	****

----- SARA TITLE III SECTION 313 CHEMICALS -----  
(SEE SECTION VII FOR CAS NUMBERS AND PERCENTAGES)

Xylene  
Methyl Alcohol  
Epichlorohydrin

## SECTION VIII - PERSONAL PROTECTION INFORMATION

EYE PROTECTION: Industrial safety glasses, minimum. As necessary to comply with 29 CFR 1910.133 and work area conditions: use side shields, goggles or face shield.

SKIN PROTECTION: As required, industrial resistant flexible-type gloves. Wear industrial-type work clothing and safety footwear. Depending on working conditions, i.e., contact potential, wear impervious protective garments such as head/neck cover, aprons, jackets, pants, coveralls, boots, etc.

RESPIRATORY PROTECTION: If ventilation does not maintain inhalation exposures below TLV(PEL), use MSHA/NIOSH approved units as per current 29 CFR1910.134 and manufacturers' "Instructions" and "Warnings". combination filter/organic vapor cartridges or canisters may be used. Full-face piece respiratory protective units required.

VENTILATION: Provide sufficient general/local exhaust ventilation in pattern/volume to control inhalation exposures below current exposure limits and areas below flammable vapor concentrations. Local exhaust is necessary for use in enclosed or confined spaces. See OSHA Requirement/NIOSH Pub. 80-106 "Working in a Confined Space".

## SECTION IX - PERSONAL HANDLING INSTRUCTIONS

HANDLING: Avoid prolonged or repeated breathing of vapors, mists or fumes. Avoid prolonged or repeated contact with skin or eyes. Observe good personal hygiene practices and recommended procedures. Application of certain protective



PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

PAGE 3A

creams (sun screens for coal tar products) before working/several times during work may be beneficial.

STORAGE: Store in areas/buildings designed to comply with OSHA 1910.106. Keep in a closed, labeled container within a cool (well shaded), dry -ventilated area. Protect from physical damage. Keep containers closed when material is not in use. Maintain good housekeeping.

OTHER: Not for use or storage in or around the home. DO NOT TAKE INTERNALLY. Do not use until manufacturer's precautions have been read/understood. Wash exposed areas promptly and thoroughly after skin contact and before eating, drinking, using tobacco products or rest rooms.

PRODUCT NAME: Bitumastic 300M Black or Red (Component A and B)

PAGE 4

## SECTION X - REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: None

INCOMPATABILITY: Avoid oxidizing materials

HAZARDOUS REACTIONS/DECOMPOSITION/COMBUSTION PRODUCTS: Toxic fumes

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: None

## SECTION XI - PHYSICAL DATA

BOILING POINT: NA

SPECIFIC GRAVITY: 10.6

MELTING POINT: ND

% VOLATILE BY VOL: 26

VAPOR PRESSURE: NA

EVAPORATION RATE(ETHER=1): moderate\*

VAPOR DENSITY(AIR-1):NA

VISCOSITY: NA

SOLUBILITY trace  
(WATER):

pH: ND

VOC: ND

COEFFICIENT OF WATER/OIL DISTRIBUTION: ND

APPEARANCE/ODOR: Black or red liquid with a coal tar and solvent odor  
+n-Butyl Acetate = 1

## SECTION XII - COMMENTS

FLASH POINT: 75F TOC (Comp. A); 400 F PHCC(Comp. B)

This product contains coal tar pitch. The IARC monographs (Vol. 35) states that there is sufficient evidence that coal tar pitches are carcinogenic in humans and that there is sufficient evidence that occupational exposure to coal tars as it occurs during the destructive distillation of coal is causally associated with the occurrence of skin cancers in humans. It is also listed in NTP and OSHA Subpart Z Table.

Persons with a history of liver/kidney/CNS/skin/respiratory disease or exposure to materials harmful to these systems are at a greater than normal risk of developing adverse health effects when working with this product.

THIS PRODUCT IS A TWO-COMPONENT PRODUCT. DATA SUPPLIED IS BASED ON MIXTURE OF BOTH COMPONENTS UNLESS OTHERWISE STATED.

Airborne particulate may be generated during removal operations including abrasive blasting, sanding or grinding. See SECTION III and VII.

EMPTY CONTAINERS may retain product residue including flammable or explosive vapors. Do not cut, drill, grind or weld on or near full, partially full or empty product containers.

No known ingredients which occur at greater than 0.1%, other than those listed above, are listed as a carcinogen in the IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans, the NTP Annual Report on Carcinogens or OSHA 29 CFR 1910.1001-1047 subpart Z Toxic and Hazardous Substances (Specifically Regulated Substances).

SKIN PROTECTION (protective material): Permeation/degradation values of chemical mixtures cannot be predicted from pure components or chemical classes.

Thus, these materials are normally best estimates based on available pure component data. A significant difference in chemical breakthrough time has been reported for generically similar gloves from different manufacturers (AIHA

PRODUCT NAME: Bitumastic 300M Black or Red (Component and B)

PAGE 4A

J., 48, 941-947 1987).

Do not use until manufacturer's precautions have been read/understood.  
Wash exposed areas promptly and thoroughly after skin contact from working with  
this product and before eating, drinking, using tobacco products or rest rooms.

Do not wear contact lens without proper eye protection when using this  
product.

Prepared By: Occupational Health and Product Safety Department

NOTICE: While the information and recommendations set forth herein are believed  
to be accurate as of the date hereof, Kop-Coat, Inc. makes no warranty  
with respect thereto and disclaims all liability from reliance thereon.

#QT

D. E. R.

VIA CERTIFIED MAIL

December 23, 1991

DEC 24 1991

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, FLD 980729610  
Operation of a Hazardous Waste Storage and Fuel Blending  
Facility, Permit No. H053-182726

Dear Mr. Crawford;

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

Part I. General

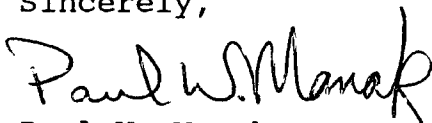
8. The facility contingency plan has been updated and distributed to the appropriate agencies. We submit the enclosed pages and request a minor amendment to the permit to replace outdated pages.
12. The certification of waste minimization is enclosed.

Part III. Tank Systems

3. A revised tanks inspection checklist, including checks on tanks R-202 and R-203 and equipment ancillary to tanks T-111, T-112, and T-114, is enclosed. We submit this revised checklist to replace page 6-3 (Figure 6.1) of the Part B application.

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

Sincerely,



Paul W. Manak  
Facility Manager

PWM/drs  
2070A

Pages inserted  
in application Dec  
3-31-92

Waste Reduction Program Certification

Laidlaw Environmental Services of Bartow, Inc. FLD980729610  
Hazardous Waste Storage and Fuel Blending Facility  
Permit No. H053-182726

This is to certify that the above-named facility has in place a program to reduce the volume and toxicity of hazardous waste generated, to the degree that is determined to be economically practicable, and which minimizes the present and future threat to human health and the environment. This program includes the following measures:

1. Improvements in the operating efficiency of hazardous waste distillation equipment, to reduce the volume and toxicity of wastes produced.
2. Re-use of distillation and fuel-blended wastes to reclaim hazardous materials which would have previously been disposed of.
3. Processing of distillation wastes through a grinder/shredder to reduce the volume of wastes produced.

*Paul W. Manak*

Paul W. Manak  
Facility Manager

December 23, 1991

cc: Steve Taylor  
Ashley Chadwick  
James Kutzman, USEPA, Region IV  
Satish Kastury, FDER, Tallahassee

2070A

VIA CERTIFIED MAIL

D. E. R.

December 20, 1991

DEC 23 1991

SOUTHWEST DISTRICT  
TAMPA

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

Re: Laidlaw Environmental Services of Bartow, FLD 980729610  
Groundwater Monitoring

Dear Mr. Crawford;

Additional monitoring well details are enclosed per your December 10 request. An explanation of enclosures follows.

I. Monitoring Wells

a. Well construction details, b. Lithology logs, c. Survey data on all wells (referenced to mean sea level), and d. Groundwater elevation and groundwater quality data are presented in the Groundwater Monitoring Project report dated July 8, 1986.

e. A description of potable water wells within 0.5 miles is enclosed (from Appendix J of the TSDF construction permit application). Since groundwater flow is generally from the North to the South, any contaminated water would flow from LESB across the airport, where it is likely to become increasingly contaminated as it flows past other airport industrial sites. There is one potable water well within approximately one mile, a deep well (150') cased to 92' used by Polk County Environmental Services for facility supply water. They have indicated that they intend to connect to the County water supply soon. The well and casing extend well through one of several confining layers and into the Floridan aquifer (see Fig. 7 of the Groundwater Monitoring Project). As such, the potential impact on this well would be expected to be negligible.

II. Stormwater Management

a., b., d. A site map and construction details of the stormwater retention areas are enclosed, showing facility drainage patterns.

c. No water is in the stormwater retention area.

e. A description of stormwater management practices is enclosed.

f. No data are available for stormwater analysis, since water rarely remains in the retention area, due to the high permeability of the soil. Since the retention area is normally dry, no sample can be taken.

g. Rainfall data for 1991 will be supplied in January, when it is available from Polk County Environmental Services.

### III. Sample Management

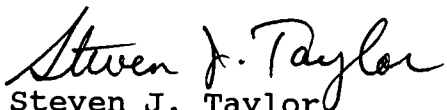
a. Wadsworth Alert Laboratories and P.E. Lamoreaux took water samples, as identified on reports sent to you.

b., c., and d. Equipment and methodology are part of the laboratories' approved QA plan, on file with FDER. If you do not have access to those plans, we will get them for you.

e. Chain of custody sheets are enclosed. MSDS for driveway sealants will be sent when they are received from material suppliers.

Again, we wish to meet with FDER representatives to discuss this matter at the earliest opportunity. Please contact me if you have any additional questions or concerns.

Sincerely,



Steven J. Taylor  
Safety and Compliance Manager

SJT/drs  
enclosures

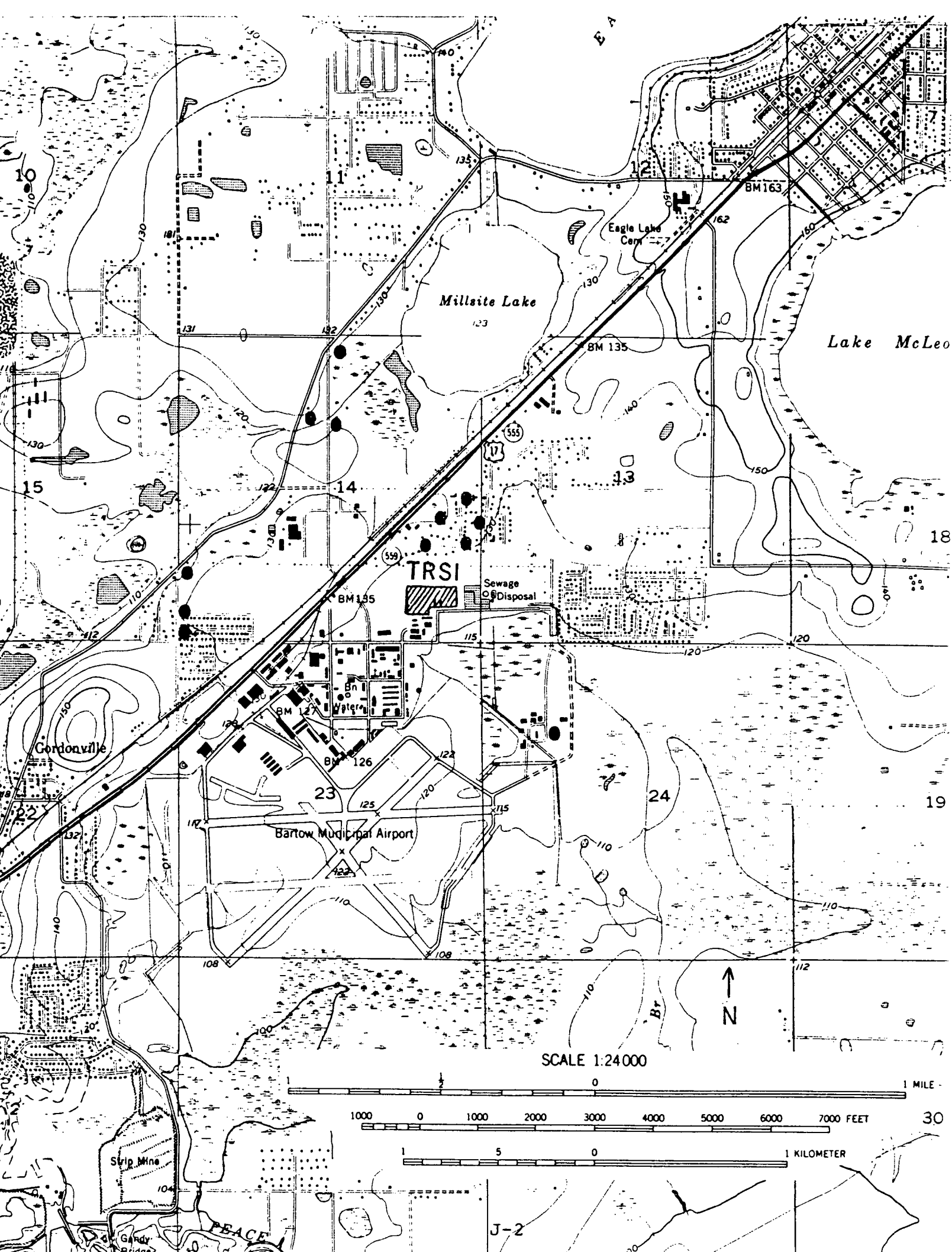
cc: Paul Manak, LES, Bartow  
Ashley Chadwick, LES, Antioch  
James Kutzman, USEPA Region IV  
Satish Kastury, FDER, Tallahassee  
Diane Trommer, FDER, Tampa (without enclosures)

2050A

## Appendix J

### Location of Drinking Water Wells





RECEIVED

DATE 9/22/89 4:40:37

SEP 27 1989

SOUTHWEST FLORIDA WATER MANAGEMENT DISTRICT

PAGE 1

RDB0055

TRI/CIL

WELL CONSTRUCTION PERMITTING

PERMIT SUMMARY FROM 00/00/00 TO 99/99/99

BY: COUNTY: BASIN: S:14 - 14 T:29 R:25 DEPTH: 0 TO 9999 DIAMETER: 0 TO 99 METHOD: USE: CASE DEPTH:

PERMIT	S	NUMBR	E	N	Y	LOCATION	Q	Q	S	T	R	A	DEPH	DEPH	T	R	S	D	C	P	R	N	F	USER-ID	LOT	H	OWNER NAME
312778	E	0000	A	20	105	4 1	142925	6																			C BURN GROV
369229	C	1997	B	20	105	0 0	142925	4	200	300	Y 40	R	49											000000		NO	LITTLE FOOD TOWN, INC.
371722	C	1066	B	20	105	0 0	142925	4	70	150	Y 0	R	51											000000		NO	SUNBELT FOREST PRODUCTS
465965	I	2426	B	20	105	0 0	142925	4	73	255	Y 7	T	39											0000		NO	SOUTH CONGREG OF JENOVAM WITNES
376897	C	1298	D	20	105	0 0	142925	2	49	115	N 0	J	34											000000		NO	CASTEEL, JEWELL
308824	E	0000	D	20	105	4 4	142925	4	101	216	0	C	47											000000		NO	J BAGLEY
314604	E	0000	D	20	105	4 3	142925	4	108	178	0	C	43											000000		NO	W MOONEYHAM
330187	E	1228	D	20	105	0 0	142925	4	94	190	0	C	46											000000		NO	ESTON E'NKE
338259	E	1079	D	20	105	0 0	142925	4	97	130	0	C	41											000000		NO	HUMPHREY, W
346366	E	1149	D	20	105	0 0	142925	4																			DAVIS, PAH
353134	C	1945	D	20	105	0 0	142925	4	76	110	0	R	42											000000		NO	COCHRAN, O. E.
416257	I	1149	D	20	105	0 0	142925	4	70	100	N 0	T	45											0000		NO	DENNEY, CHARLES
416446	I	1149	D	20	105	0 0	142925	4	80	140	N 0	T	42											0000		NO	WYATT, DARRELL
428536	I	2276	D	20	105	0 0	142925	4	75	150	0	C	0											0000		NO	STALLINGS, JAMES
437424	I	9002	D	20	105	0 0	142925	4	92	145	0	C	0											020000	0013	NO	BRADBERRY, CLYDE
459719	I	1066	I	20	105	0 0	142925	4																			SUNBELT FOREST PRODUCTS
402111	C	1945	D	20	105	0 0	142925	2	15	20	N 0	R	0											MW #01		NO	SUN PAC
402112	C	1945	D	20	105	0 0	142925	2	15	20	N 0	R	0											MW #02		NO	SUN PAC
402113	C	1945	D	20	105	0 0	142925	2	15	20	N 0	R	0											MW #03		NO	SUN PAC
402114	C	1945	D	20	105	0 0	142925	2	15	20	N 0	R	0											MW #04		NO	SUN PAC
415774	I	2858	D	20	105	4 3	142925	2	35	40	Y 1	A	0											WELL-1	0001	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415775	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											WELL-2	0002	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415776	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											WELL-3	0003	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415777	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											WELL-4	0004	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415778	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											WELL-5	0005	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415779	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											MW-1	0001	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415780	I	2858	D	20	105	4 3	142925	2	2	20	Y 1	A	0											MW-2	0002	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415781	I	2858	D	20	105	4 3	142925	2	2	20	Y 1	A	0											MW-3	0003	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415782	I	2858	D	20	105	4 3	142925	2	2	15	Y 1	A	0											MW-4	0004	NO	BARTOW MUNICIPAL AIRPORT DEV AH
415783	N	2858	D	20	105	4 3	142925	2	***	CANCELLED	***																BARTOW MUNICIPAL AIRPORT DEV AH
416993	I	1715	D	20	105	0 0	142925	2	9	24	Y 1	R	0											MW-1	0000	NO	SUN PACK FOODS
416994	I	1715	D	20	105	0 0	142925	2	9	24	Y 1	R	0											MW-2	0000	NO	SUN PACK FOODS
416995	I	1715	D	20	105	0 0	142925	2	24	39	Y 3	R	0											MW-3	0000	NO	SUN PACK FOODS
416996	I	1715	D	20	105	0 0	142925	2	9	24	Y 1	R	0											MW-4	0000	NO	SUN PACK FOODS

DATE 9/18/89 08:23:57

## SOUTHWEST FLORIDA WATER MANAGEMENT DISTRICT

PAGE 1

## WELL CONSTRUCTION PERMITTING

ROB0055

PERMIT SUMMARY FROM: 00/00/00 TO 99/99/99

BY: COUNTY: BASIN: S:23 - 23 T:29 R:25 DEPTH: 0 TO 9999 DIAMETER: 0 TO 99 METHOD: USE: CASE DEPTH:

PERMIT	S	U	L	I	C	N	Y	Q	S	T	R	A	D	E	P	H	T	R	S	D	C	P	R	M	F	USER-ID	LOT	H	OWNER NAME
471676	I	2467	A	20	105	0	0	232925	2																				TUCKER CONSTRUCTION
325277	H	1537	D	20	105	0	0	232925	4	92	150	0	C	42											000000		NO		POLK CO ENVIRNMENTAL SERVICES
395621	E	2071	0	20	105	4	1	232925	2	4	16	0	R	0											MW-1		NO		CULLIGAN WATER CONDITIONING
395622	E	2071	0	20	105	4	1	232925	2	4	16	N	O	R	0										MW-2		NO		CULLIGAN WATER CONDITIONING
397669	C	2071	0	20	105	4	4	232925	2	3	23	Y	1	R	6										AVE C		NO		CULLIGAN WATER CONDITIONING
430174	I	1232	0	20	105	0	0	232925	2	1	9	Y	1	A	4										MW-1	0000	NO		TAMPA COLD STORAGE & WAREHOUSE
430175	I	1232	0	20	105	0	0	232925	2	2	12		O	A	4										MW-2	0000	NO		TAMPA COLD STORAGE & WAREHOUSE
430176	I	1232	0	20	105	0	0	232925	2	2	12		O	A	4										MW-3	0000	NO		TAMPA COLD STORAGE & WAREHOUSE
430177	I	1232	0	20	105	0	0	232925	2	2	12		O	A	4										MW-4	0000	NO		TAMPA COLD STORAGE & WAREHOUSE
430425	I	2730	0	20	105	0	0	232925	2	3	13	Y	1	A	6										MW-1	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430426	I	2730	0	20	105	0	0	232925	2	3	13	Y	1	A	6										MW-2	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430427	I	2730	0	20	105	0	0	232925	2	3	13	Y	1	A	6										MW-3	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430428	I	2730	0	20	105	0	0	232925	2	3	13	Y	1	A	6										MW-4	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430429	I	2730	0	20	105	0	0	232925	2	3	15	Y	1	R	9										MW-1	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430430	I	2730	0	20	105	0	0	232925	2	3	15	Y	1	R	9										MW-2	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430431	I	2730	0	20	105	0	0	232925	2	3	15	Y	1	R	9										MW-3	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
430432	I	2730	0	20	105	0	0	232925	2	3	15	Y	1	R	9										MW-4	0000	NO		BARTOW MUNICIPAL AIRPORT DEV AH
455986	I	2252	0	20	105	0	0	232925	2	15	15		O	R	4											0000	NO		SABAL TRANSPORT
463749	I	2368	0	20	105	3	1	232925	2	10	16	Y	S	R	14											0000	NO		XERXES, CORPORATION
463750	I	2368	0	20	105	3	1	232925	2																				XERXES, CORPORATION
463892	I	2368	0	20	105	3	1	232925	2	15	16	Y	2	R	14											0000	NO		XERXES, CORPORATION
414007	I	9999	Y	20	105	0	0	232925	2	40	60	Y	2	R	0										000000	0000	NO		NAUCE, SHIRLEY

J-4

1-20.

DRAWING NUMBER 360101  
W.A. READ, JR AND ASSOCIATES  
BARTON, FLORIDA  
SIO SOUTH CENTRAL AVENUE  
SPOT ELEVATION 129.55  
SECTION  
SWALE  
Channel

Revised 7/29/80 - TOPG ALUMINUM NORTH COMPANY, INC.  
EASTING QUOTE SHEET #2 TO BE C

FOOTED  
WATER MANAGEMENT AREA

7. Elev. 124.00

Revised 3/22/88 - Some Proposed Improvements WGL  
SHEET TWO OF THREE SHEETS

CONTROL STRUCTURE  
Not To Scale

Stormwater Management at  
Laidlaw Environmental Services of Bartow

1. All rainwater which falls into contained areas around RCRA units is captured, collected, and pumped to the wastewater storage tank (T-604) for discharge to the City of Bartow publicly-owned treatment works.
2. Rainwater which enters the drum storage building is collected in the center trench and pumped to the wastewater storage tank (T-604).
3. Rainwater which falls on the driveway is collected at the trench on the south side of the drive for approximately fifteen (15) minutes and pumped to the wastewater storage tank (T-604). Due to the volume of rainwater which typically falls on the driveway, after collecting the initial flush the manually-operated gate valve at the trench sump is opened to allow water to flow into the stormwater retention basin.
4. The stormwater retention basin holds water until enough accumulates to flow over the weir and into airport drainage ditches.
5. All movement of water between containment areas, sumps, and the wastewater storage tank is done by manual operation of all valves and pumps.

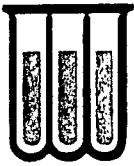
ST/drs  
2064A



WADSWORTH/ALERT  
LABORATORIES, INC.

## **QUALITY CONTROL SECTION**

- Quality Control Summary
- Laboratory Blanks
- Laboratory Control Sample
- Matrix Spike/Matrix Spike Duplicate Results
- Sample Custody Documentation



WADSWORTH/ALERT  
LABORATORIES, INC.

QUALITY ASSURANCE / QUALITY CONTROL  
PROGRAM SUMMARY

Wadsworth/ALERT Laboratories considers continuous analytical method performance evaluations to be an integral portion of the data package, and routinely includes the pertinent QA/QC data associated with various analytical result reports. Brief discussions of the various QA/QC procedures utilized to measure acceptable method and matrix performance follow.

Surrogate Spike Recovery Evaluations

Known concentrations of designated surrogate spikes, consisting of a number of similar, non-method compounds or method compound analogues, are added, as appropriate, to routine GC and GC/MS sample fractions prior to extraction and analysis. The percent recovery determinations calculated from the subsequent analysis is an indication of the overall method efficiency for the individual sample. This surrogate spike recovery data is displayed alongside acceptable analytical method performance limits at the bottom of each applicable analytical result report sheet.

NOTE: Acceptable method performance for Base/Neutral Acid extractables is indicated by two (2) of three (3) surrogates for each fraction with a minimum recovery of ten (10) percent each. For Pesticides one (1) of two (2) surrogates meeting performance criteria is acceptable.

Laboratory Analytical Method Blank Evaluations

Laboratory analytical method blanks are systematically prepared and analyzed in order to continuously evaluate the system interferences and background contamination levels associated with each analytical method. These method blanks include all aspects of actual laboratory method analysis (chemical reagents, glassware, etc.), substituting laboratory reagent water or solid for actual sample. The method blank must not contain any analytes above the reported detection limit. The following common laboratory contaminants are exceptions to this rule provided they are not present at greater than five times the detection limit.

<u>Volatiles</u>	<u>Semi-volatiles</u>	<u>Metals</u>
Methylene chloride	Dimethyl phthalate	Calcium
Toluene	Diethyl phthalate	Magnesium
2-Butanone	Di-n-butyl phthalate	Sodium
Acetone	Butyl benzyl phthalate	
	Bis (2-ethylhexyl) phthalate	

A minimum of five percent (5%) of all laboratory analyses are laboratory analytical method blanks.

Laboratory Analytical Method Check Sample Evaluations

Known concentrations of designated matrix spikes (actual analytical method compounds) are added to a laboratory reagent blank prior to extraction and analysis. Percent recovery determinations demonstrate the performance of the analytical method. Failure of a check sample to meet established laboratory recovery criteria is cause to stop the analysis until the problem is resolved.



WADSWORTH/ALERT  
LABORATORIES, INC.

QUALITY ASSURANCE / QUALITY CONTROL  
PROGRAM SUMMARY  
(cont'd)

At that time all associated samples must be re-analyzed. A minimum of five percent (5%) of all laboratory analyses are laboratory analytical method check samples.

Matrix Spike (MS)/Matrix Spike Duplicate (MSD) Recovery Evaluations

Known concentrations of designated matrix spikes (actual analytical method compounds) are added to two of three separate aliquots of a sequentially predetermined sample prior to extraction and analysis. Percent recovery determinations are calculated from both of the spiked samples by comparison to the actual values generated from the unspiked sample. These percent recovery determinations indicate the accuracy of the analysis at recovering actual analytical method compounds from the matrix. Relative percent difference determinations calculated from a comparison of the MS/MSD recoveries demonstrate the precision of the analytical method. Actual percent recovery and relative percent difference data is displayed alongside their respective acceptable analytical method performance limits in the QA/QC section of the report. The MS/MSD are considered in control when the precision is within established control limits and the associated check sample has been found to be acceptable. A minimum of ten percent (10%) of all analyses are MS/MSD quality control samples.

\*\*\*\*\*EXAMPLE\*\*\*\*\*

COMPOUND	SAMPLE CONC.	MS %REC	MSD %REC	RPD	QC LIMITS	
					RPD	RECOVERY
4,4' -DDT	0	95	112	16	22	66-119
Benzene	10	86	93	8	20	39-150

(cmpd. name)	sample	1st%	2nd%	Rel.%	accep. method
	result	recov.	recov.	diff.	perform range

Analytical Result Qualifiers

The following qualifiers, as defined below, may be appended to analytical results in order to allow proper interpretation of the results presented:

J - indicates an estimated concentration (typically used when a dilution, matrix interference or instrumental limitation prevents accurate quantitation of a particular analyte).

B - indicates the presence of a particular analyte in the laboratory blank analyzed concurrently with the samples. Results must be interpreted accordingly.

DIL - indicates that because of matrix interferences and/or high analyte concentrations, it was necessary to dilute the sample to a point where the surrogate or spike concentrations fell below a quantifiable amount and could not be reported.





WADSWORTH/ALERT  
LABORATORIES, INC.

COMPANY: LAIDLAW ENVIRONMENTAL SERVICES  
LAB #: 1K1601-BK  
MATRIX: WATER

DATE RECEIVED: 11/16/91  
DATE EXTRACTED: NA  
DATE ANALYZED: 11/18/91

SAMPLE ID: LABORATORY BLANK

VOLATILE ORGANICS  
USEPA METHOD 8240 - GC/MS

CERTIFICATION #: E84059  
HRS84297

Acetone	ND**	cis-1,3-Dichloropropene	ND
Benzene	ND	trans-1,3-dichloropropene	ND
Bromodichloromethane	ND	Ethylbenzene	ND
Bromoform	ND	2-Hexanone	ND**
Bromomethane	ND	Methylene chloride	ND
2-Butanone	ND**	4-Methyl-2-pentanone	ND**
Carbon disulfide	ND	Styrene	ND
Carbon tetrachloride	ND	1,1,2,2-Tetrachloroethane	ND
Chlorobenzene	ND	Tetrachloroethene	ND
Chlorodibromomethane	ND	Toluene	ND
Chloroethane	ND	1,1,1-Trichloroethane	ND
Chloroform	ND	1,1,2-Trichloroethane	ND
Chloromethane	ND	Trichloroethene	ND
1,1-Dichloroethane	ND	Vinyl chloride	ND
1,2-Dichloroethane	ND	Xylene(Total)	ND
1,1-Dichloroethene	ND		
1,2-Dichloroethene(Total)	ND		
1,2-Dichloropropane	ND		

NOTE: ND (None Detected, lower detectable limit = 1 ug/L) as rec'd  
ND\* (None Detected, lower detectable limit = 1 ug/L) as rec'd  
ND\*\* (None Detected, lower detectable limit = 10 ug/L) as rec'd  
J (Detected, but below quantitation limit; estimated value)  
B (Compound detected in method blank associated with this sample)  
-- (Not Analyzed)

SURROGATE RECOVERY:	%	ACCEPTABLE LIMITS		
		WATER	SOLID	LOW LEVEL
1,2-Dichloroethane	99	(75-123)	(85-126)	(85-138)
Toluene-d8	102	(92-107)	(89-124)	(89-128)
Bromofluorobenzene	99	(86-115)	(84-124)	(83-128)



WADSWORTH/ALERT  
LABORATORIES, INC.

LAB #/: 1K1601-LCS  
MATRIX: WATER  
METHOD: 8240

DATE RECEIVED: 11/16/91  
DATE EXTRACTED: NA  
DATE ANALYZED: 11/18/91

LABORATORY CHECK SAMPLE

COMPOUND	LCS %REC	QC LIMITS %RECOVERY
1,1-Dichloroethene	63	56-133
Trichloroethene	78	67-106
Chlorobenzene	89	78-122
Toluene	88	64-128
Benzene	88	83-123
Dichlorobromomethane	75	71-123

L1702

WADSWORTH/ALERT LABORATORIES  
SAMPLE SHIPPER EVALUATION AND RECEIPT FORM

Client: LAIDLAW Project Name/Number: \_\_\_\_\_

Samples Received By: Carol Mc Nulty Date Received: 11/16/91  
(Signature)

Sample Evaluation Form By: Carol Mc Nulty LAB No: 3279 / 1K1601-159  
(Signature)

Type of shipping container were samples received in? WAL Cooler X

Client Cooler \_\_\_\_\_ WAL Shipper \_\_\_\_\_ Box \_\_\_\_\_ Other \_\_\_\_\_

Any "NO" responses or discrepancies should be explained in comments section.

- |   | YES                | NO           |
|---|--------------------|--------------|
| 1. Were custody seals on shipping container(s) intact? . . . . .  | <u>No. Custody</u> | <u>Seals</u> |
| 2. Were custody papers included with samples? . . . . .   | <u>X</u>           | _____        |
| 3. Were custody papers properly filled out (ink, signed, match labels)? . . . . .   | <u>X</u>           | _____        |
| 4. Did all bottles arrive in good condition (unbroken)? . . . . .   | <u>X</u>           | _____        |
| 5. Were all bottle labels complete (Sample No., date, signed, analysis, preservatives)? . . . . .                                     | <u>X</u>           | _____        |
| 6. Were correct bottles used for the tests indicated? . . . . .   | <u>X</u>           | _____        |
| 7. Were proper sample preservation techniques indicated? . . . . .  | <u>X</u>           | _____        |
| 8. Were samples received within adequate holding time? . . . . .  | <u>X</u>           | _____        |
| 9. Were all VOA bottles checked for the presence of air bubbles? . . . . .<br>(If air bubbles were found indicate in comment section) | <u>X</u>           | _____        |
| 10. Were samples in direct contact with wet ice? . . . . .<br>(NOTE TEMPERATURE BELOW)  | <u>X</u>           | _____        |
| 12. Were samples accepted into the laboratory? . . . . .<br>(If no see comments)  | <u>X</u>           | _____        |

Cooler # \_\_\_\_\_ Temp 3 °C Cooler # \_\_\_\_\_ Temp \_\_\_\_\_ °C

Cooler # \_\_\_\_\_ Temp \_\_\_\_\_ °C Cooler # \_\_\_\_\_ Temp \_\_\_\_\_ °C

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

5910-H BRECKENRIDGE PARKWAY/TAMPA, FL 33610  
(813) 621-0784

No

4407

[illegible]

Distribution Original Accompanies Shipment. Copy returned with Report.

\* Report TICS  
\* Results by Thursday 12





D.E.R.

JUN 21 1991

HAND DELIVERED

SOUTHWEST DISTRICT TAMPA

June 21, 1991

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Victor San Agustin, Waste Management

Re: Hazardous Waste Permit Renewal Application #H053-18276  
Hazardous Waste Storage Facility Permit # H053-86011A

Dear Mr. San Agustin;

As you requested, we have put into binders the Part B Application portions which describe hazardous waste operations at the Laidlaw Environmental Services of Bartow, Inc., facility. The text of several chapters have been revised to better describe facility operating procedures, but no revisions have been made which would require a modification to the permit, other than those sections for which modifications have been specifically requested. Some appendices have been deleted for which no inserts could be found and which were irrelevant to permitting issues.

In an effort to improve and streamline the referenced permits, Chapter 6 (inspections) has been revised to make the forms more readily usable. Forms currently in use duplicate inspections of several areas on daily, weekly, and monthly checklists. Where an item is being inspected daily, there is no need for an additional weekly inspection. As discussed with you during your visit to the site May 20, 1991, the daily inspection of waste tank high level alarms has been deleted. Since a high level alarm is not a requirement, and since our ultrasonic high level alarm detection system was destroyed by lightning, a daily inspection of this is neither necessary nor possible. The mechanical float level sensing system was repaired in December, 1990, and is equipped with a high level alarm also. However, the nature of this system makes it unable to be tested short of filling the tank to the set point and risking an overflow. We are evaluating alternate methods of testing this alarm system on a less frequent basis; however, it must be emphasized that tanks are equipped with level indicators and are all closed-top. Also, additions to tanks are made by batch, thereby providing an adequate measure against overfilling, and thus the system is in compliance with 40 CFR 264.194. Although the former inspection check list included a space for both the high level alarm and the level indicators, the high level alarms are an additional

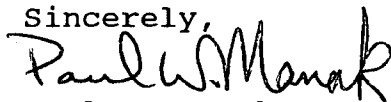
measure of protection and not the "primary" method of determining tank levels at the Bartow facility. Deleting the high level alarm from the inspection form is justified to avoid confusion by the regulatory agencies.

We request the addition of the revised Chapter Six as a minor modification to permit #H053-86011A (current operating) and permit #H053-18276. If you have any questions or require additional information, please contact me at (813) 533-6111.

I believe you will find the revised Part B information more readily usable, more concise, and more descriptive of facility operations than the initial Part B submission. Additionally, Contingency Plan, Part I information, and certification pages have been updated to reflect current management. We have provided three bound copies for your use.

If you have any questions or require additional information, please contact me at (813) 533-6111.

Sincerely,

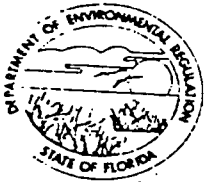


Paul W. Manak  
Facility Manager

ST/drs

cc: Ashley Chadwick  
Steve Taylor  
John E. Deal  
Barbara Hamilton, Esquire

1217A



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

FROM: BILL CRAWFORD *BC*

DATE: NOVEMBER 6, 1991

SUBJECT: LAIDLAW ENVIRONMENTAL SERVICES OF BARTOW FLD 980 729 610  
OPERATING PERMIT APPLICATION HO53-182726  
AFFIDAVITS OF PUBLICATION AND BROADCAST

ATTACHED PLEASE FIND THE SUBMITTAL DATED NOVEMBER 4, 1991 AND SUBMITTED NOVEMBER 5, 1991. YOUR COMMENTS ARE NEEDED FOR OUR RESPONSE TO THIS SUBMITTAL AND SHOULD BE PROVIDED WITHIN 45 DAYS.

C.C. JAMES H SCARBROUGH EPA/REGION IV

*A, 4-c*



VIA CERTIFIED MAIL

November 4, 1991

A, 4-C

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

Re: Laidlaw Environmental Services of Bartow, Inc. FLD980729610  
Hazardous Waste Facility Operating Permit # H053-182726

Dear Mr. Crawford;

Enclosed please find copies of affidavits of radio broadcast and newspaper publication of the Intent to Issue the referenced permit. These notifications were previously sent by regular mail.

Sincerely,

*Steve Taylor*

Steve Taylor  
Safety and Compliance Manager

ST/drs  
enclosures

cc: FDER Tallahassee  
USEPA, Region IV

1891A

D. E. R.

NOV - 5 1991

SOUTHWEST DISTRICT  
TAMPA

THORNBURG COMMUNICATIONS, INC.  
 AUDIO SERVICES\*ON HOLD\*WWBF-AM  
 POST OFFICE BOX 50  
 BARTOW, FLORIDA 33830  
 (813) 533-0744  
 FAX (813) 533-8546

\*\*\*\*\*  
 \*\*\* I N V O I C E \*\*\*  
 \*\*\*\*\*

RECEIVED  
 OCT 02 1991  
 TPICIL

INVOICE DATE: 09/30/91

ACCOUNT NUMBER: 10070

PAGE: 1

TERMS: NET 30; 1.5% SVC. CHG.

=====

LIDLAW ENVIRONMENTAL SVCS.  
 170 BARTOW MUNICIPAL AIRPORT  
 BARTOW, FLORIDA 33830  
 ATTN: ACCOUNTS PAYABLE DEPT.  
 =====

WBF..AM 1130..NASCAR RACES..NASCAR LIVE..ON PIT ROAD..NASCAR TODAY!

INVOICE	DATE	TERMS OR REF	CODE	DEBITS	CREDITS	BALANCE
9672	09/27/91	EPA LEGAL NOTICE	0	25.00		25.00

The undersigned, having been duly sworn, deposes and says that broadcasting services have been rendered by this station in accordance with the above statement.

*[Signature]* signed.  
 Sworn to and subscribed before me this  
30th day of Sept., 1991

*[Signature]*  
 Notary Public

APPROVED BY PWM 10/3/91

Notary Public, State of Florida at Large  
 My Commission Expires Dec. 3, 1992

CODE

- |               |                |
|---------------|----------------|
| 0 - SALE      | 5 - PAYMENT    |
| 1 - PROD CHG. | 6 - CREDIT     |
| 2 - SALES TAX | 7 - DISCOUNT   |
| 3 - SVC CHG.  | 8 - COMMISSION |
| 4 - MISC DB.  | 9 - MISC CR.   |

=====

TOTAL DUE \$25.00

=====

WWBF AFFIDAVIT

DATE	ACCT NO.	COMMERCIAL TITLE	TIME	LENGTH	COST
SEP 27	10070-00	LAIDLAW ENVIRONMENTAL EPA LEGAL NOTICE	2:33 PM	3 MIN	25.00

TOTAL AMOUNT DUE \$25.00

These announcements were broadcast as shown above.

Sworn on this Monday, September 30, 1991

STATE OF FLORIDA  
COUNTY OF POLK

The undersigned, having been duly sworn, deposes and says that broadcasting services have been rendered by this station in accordance with the above statement.

*[Signature]* signed.  
Sworn to and subscribed before me this  
30<sup>th</sup> day of Sept., 1991

*[Signature]*  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires Dec. 3, 1992

**PUBLIC NOTICE OF PROPOSED AGENCY ACTION**  
**Radio Announcement**

**FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION**  
**4520 Oak Fair Boulevard**  
**Tampa, Florida 33610-7347**  
**(813) 623-5561**

The Florida Department of Environmental Regulation and the U.S. Environmental Protection Agency give notice of their Intent to Issue joint permits under the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984, Section 403.722, Florida Statutes, and Chapter 17-4 and 17-730 of the Florida Administrative Code to Laidlaw Environmental Services of Bartow, Inc. for the operation of a hazardous waste storage and fuel blending facility at 170 Bartow Municipal Airport, Bartow, Polk County, Florida. The two permits, if issued, will constitute the RCRA permit required by Florida DER and the U.S. EPA.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

A person whose substantial interests are affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes. If a petition on the Department's permit is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final agency action may be different from the position taken in this preliminary statement. Additionally, persons who support the proposed agency action may also wish to intervene in the proceeding.

For more information concerning the applicable requirements of the petitioning process and the necessary time frames for filing, please contact the Tampa District Office at 813/623-5561. The application and a copy of the State permit are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at either:

Florida Department of Environmental Regulation  
Southwest District Office  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
(813) 623-5561.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR (p)124.11. The hearing request must be in writing and should be addressed to Mr. James H. Scarbrough, U.S. EPA at 345 Courtland Street, N.E., Atlanta, Georgia 30365 within 45 days of this notice.

**THE LEDGER**  
**Lakeland, Polk County, Florida**

C 722



Resource Recovery

H053-182726

A, 4-c

D.E.R.

OCT 16 1991

SOUTHWEST DISTRICT  
TAMPA

VIA CERTIFIED MAIL

October 15, 1991

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, FLD 980729610  
Notification of importation of hazardous wastes from a foreign  
country

Dear Mr. Crawford;

In accordance with Specific Condition #1 of Hazardous Waste Operating Permit #H053-86011A, Laidlaw Environmental Services of Bartow, Inc., hereby notifies the Department that it intends to receive, on a regular basis, bulk shipments of waste methylene chloride and waste methanol (EPA hazardous waste codes F002, F003, F005) from Freeport, Grand Bahamas Islands. Attached are waste profile sheets describing the wastes. If you have any questions, please contact me.

Sincerely,

Steve Taylor  
Safety and Compliance Manager

ST/drs

cc: Paul Manak  
Ron Tucker

1799A

## MATERIAL PROFILE

Name of Waste Stream

CH<sub>2</sub>Cl<sub>2</sub> 79870

Laidlaw Use Only

Generator Name SINTEX  
 Facility Address \_\_\_\_\_  
FREEPORT, GRAND BAHAMA  
 City \_\_\_\_\_  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 EPA Identification Number \_\_\_\_\_

Technical Contact LENNY GRUBBS  
 Title \_\_\_\_\_  
 Telephone (809) 352 8171 EXT \_\_\_\_\_  
 Billing Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Is Sample Available Upon Request?

Yes \_\_\_\_\_  
 No \_\_\_\_\_

Process Generating Waste \_\_\_\_\_  
 Rate of Generation \_\_\_\_\_ Container Type/Size BULK EPA Waste No F002 State Waste No \_\_\_\_\_  
 1 Does this waste contain spent solvents (F001 through F005)? Y \_\_\_\_\_ N \_\_\_\_\_ Materials listed under the California list? Y \_\_\_\_\_ N \_\_\_\_\_  
 2 Is this waste listed for Dioxin as defined in 40 CFR 262.31? (F020 - F023 and F026 - 28) Y \_\_\_\_\_ N \_\_\_\_\_  
 3 Is this waste INFECTIOUS? Y \_\_\_\_\_ N \_\_\_\_\_ Is it RADIOACTIVE? Y \_\_\_\_\_ N \_\_\_\_\_ Does it contain PCB's > 50ppm? Y \_\_\_\_\_ N ✓  
 4 If you answered yes to questions 2 or 3 DO NOT CONTINUE Please contact your LAIDLAW Technical Sales Representative for assistance

### Chemical Constituents (Must Total 100%)

Methylene Chloride 98-100  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
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 \_\_\_\_\_  
 \_\_\_\_\_

### Physical Characteristics at 70° F

Physical State: Liquid ✓ Semisolid \_\_\_\_\_ Solid \_\_\_\_\_  
 Layers: None ✓ Two \_\_\_\_\_ Multilayers \_\_\_\_\_  
 Free Liquids (%) 100 Precipitated Solids (%) ✓  
 Viscosity: Low ✓ Medium \_\_\_\_\_ High \_\_\_\_\_  
 Is Material Pumpable? Yes \_\_\_\_\_ No \_\_\_\_\_ Polymerizable? Yes \_\_\_\_\_ No ✓  
 Specific Weight (lbs./gal) \_\_\_\_\_ OR Specific Gravity (g/cc) 1.1  
 Appearance clear Odor \_\_\_\_\_  
 Flash Point(cc): Exact \_\_\_\_\_ <60 F \_\_\_\_\_ 61 F - 100 F \_\_\_\_\_  
 101° F - 140° F \_\_\_\_\_ 141 F - 200 F \_\_\_\_\_ >200 F ✓  
 BTU/lb. <1000 Ash(%) 43 Water(%) 8  
 pH (avg) \_\_\_\_\_ Range 6 to \_\_\_\_\_  
 Reactivity (Reactive with): \_\_\_\_\_

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

### Metals (ppm)

Total	EP
As	<u>25</u>
Ag	<u>23</u>
Cd	<u>1</u>
Ba	<u>100</u>
Pb	<u>25</u>

Total	EP
Cr(Total)	<u>25</u>
Cr(Hex)	<u>25</u>
Hg	<u>10.2</u>
Se	<u>1</u>

Total	Total
Be	<u>&lt;10</u>
Ti	<u>&lt;10</u>
Sb	<u>&lt;10</u>
S	<u>&lt;10</u>
P	<u>&lt;10</u>
Si	<u>&lt;10</u>
Na	<u>&lt;10</u>
Ni	<u>&lt;10</u>
Cu	<u>&lt;10</u>
Zn	<u>&lt;10</u>

### Other (Specify in PPM)

Free Cyanide 0 PCBs 0  
 Free Sulfide 0  
 Phenolics 0  
 Total Organic Halogens (%)  
 Fluorine 0 Bromine 0  
 Chlorine 98-100

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed

Generators Signature \_\_\_\_\_

Date \_\_\_\_\_

Information Completed By

Name \_\_\_\_\_ Title \_\_\_\_\_  
 Date \_\_\_\_\_

## MATERIAL PROFILE

Name of Waste Stream

CH<sub>2</sub>Cl<sub>2</sub> 75-85

LAIDLAW Use Only

Generator Name SYNTEX  
 Facility Address \_\_\_\_\_  
 City FREEPORT, GRAND BAHAMAS  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 EPA Identification Number \_\_\_\_\_

Technical Contact LENNON GIBBS  
 Title ENVIRONMENTAL SPECIALIST  
 Telephone ( ) 809 352 8171 EXT 4270  
 Billing Address \_\_\_\_\_  
 City FREEPORT State BAHAMAS Zip \_\_\_\_\_

Is Sample Available Upon Request?

Yes \_\_\_\_\_  
 No \_\_\_\_\_

Process Generating Waste PHARMACEUTICAL FOOD, FOODS, FOODS  
 Rate of Generation \_\_\_\_\_ Container Type/Size \_\_\_\_\_ EPA Waste No. \_\_\_\_\_ State Waste No. \_\_\_\_\_  
 1 Does this waste contain spent solvents (F001 through F005)? Y ☒ N \_\_\_\_\_ Materials listed under the California list? Y ☒ N \_\_\_\_\_  
 2 Is this waste listed for Dioxin as defined in 40 CFR 262.31? (F020 F023 and F026 - 28) Y \_\_\_\_\_ N ☒ \_\_\_\_\_  
 3 Is this waste INFECTIOUS? Y \_\_\_\_\_ N ☒ Is it RADIOACTIVE? Y \_\_\_\_\_ N ☒ Does it contain PCB's > 50ppm? Y \_\_\_\_\_ N ☒ \_\_\_\_\_  
 4. If you answered yes to questions 2 or 3... DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

### Chemical Constituents (Must Total 100%)

<u>Methylene Chloride</u>	<u>75-85</u>
<u>METHANOL</u>	<u>1-5</u>
<u>ETHYL ACETATE</u>	<u>5-6</u>
<u>TETRAHYDROFURAN</u>	<u>5-8</u>
<u>WAXES</u>	<u>3-9</u>
<u>WATER</u>	<u>1-2</u>

### Physical Characteristics at 70°F

Physical State: Liquid ☒ Semisolid \_\_\_\_\_ Solid \_\_\_\_\_  
 Layers: None ☒ Two \_\_\_\_\_ Multilayers \_\_\_\_\_  
 Free Liquids (%) 100% Precipitated Solids (%) \_\_\_\_\_  
 Viscosity: Low ☒ Medium \_\_\_\_\_ High \_\_\_\_\_  
 Is Material Pumpable? Yes ☒ No \_\_\_\_\_ Polymerizable? Yes \_\_\_\_\_ No ☒ \_\_\_\_\_  
 Specific Weight (lbs./gal) ~9-10.5 OR Specific Gravity (g/cc) \_\_\_\_\_  
 Appearance Amber Clear Odor \_\_\_\_\_  
 Flash Point(cc): Exact \_\_\_\_\_ <60 F \_\_\_\_\_ 61 F - 100 F \_\_\_\_\_  
 101 F - 140°F \_\_\_\_\_ 141 F - 200 F \_\_\_\_\_ >200 F ☒ \_\_\_\_\_  
 BTU/lb <1000 Ash(%) 2.2 Water(%) 1-2%  
 pH (avg) \_\_\_\_\_ Range 5 to 10  
 Reactivity (Reactive with) \_\_\_\_\_

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

### Metals (ppm)

Total	EP
As _____	<u>25</u>
Ag _____	<u>25</u>
Cd _____	<u>1</u>
Ba _____	<u>&lt;100</u>
Pb _____	<u>25</u>

Total	EP
Cr(Total) _____	<u>25</u>
Cr(Hex) _____	<u>25</u>
Hg _____	<u>10.2</u>
Se _____	<u>1</u>

Total	Total
Be <u>&lt;10</u>	Si <u>&lt;10</u>
Ti <u>&lt;10</u>	Na <u>&lt;10</u>
Sb <u>&lt;10</u>	Ni <u>&lt;10</u>
S <u>&lt;10</u>	Cu <u>&lt;10</u>
P <u>&lt;10</u>	Zn <u>&lt;10</u>

### Other (Specify in PPM)

Free Cyanide 0 PCB's 0  
 Free Sulfide 0  
 Phenolics 0  
 Total Organic Halogens (%)  
 Fluorine 0 Bromine 0  
 Chlorine 75-85

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed.

Generators Signature \_\_\_\_\_

Date 1.10.91

Information Completed By

Name LENNON GIBBS  
 Title ENV. SPECIALIST Date 1/10/91



**MATERIAL PROFILE**

Name of Waste Stream

L/AID/LAW Use Only

CH<sub>2</sub>Cl<sub>2</sub> 50-60%

Generator Name

SYNTEX

Facility Address

Technical Contact

LENNOX GIBBS

Title

Telephone

( )

EXT.

Billing Address

Is Sample

Available

Upon Request?

City

FREEPORT, GRAND BAHAMAS

State

Zip Code

EPA Identification Number

City

State

Zip

Yes

No

Process Generating Waste

PHARMACEUTICAL

Rate of Generation

2500 gal

Container Type/Size

BULK

EPA Waste No.

F002, F003

State Waste No.

F005

1. Does this waste contain spent solvents (F001 through F005)? Y    N   

Materials listed under the California list? Y    N   

2. Is this waste listed for Dioxin as defined in 40 CFR 262.31? (F020 - F023 and F026 - 28) Y    N   

3. Is this waste INFECTIOUS? Y    N    Is it RADIOACTIVE? Y    N   

Does it contain PCB's > 50ppm? Y    N   

4. If you answered yes to questions 2 or 3, DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

Chemical Constituents (Must Total 100%)

Methylene Chloride 50-60  
Methanol 3-5  
Ethyl Acetate 5-8  
Tetrahydrofuran 10-15  
Isobutene 10-12  
Water 2-5

Physical Characteristics at 70° F

Physical State: Liquid    ✓

Semisolid

Solid

Layers: None    ✓

Two

Multilayers

Free Liquids (%)    ✓

Precipitated Solids (%)

Viscosity: Low    ✓

Medium

High

Is Material Pumpable? Yes    ✓

No

Polymerizable? Yes

No

Specific Weight (lbs/gal) 8.9 #/gal

Oil Specific Gravity (g/cc)

Appearance Amber - Clear

Odor

Sweet

Flash Point(cc): Exact

<60 F

61 F 100 F

101° F - 140° F

141 F - 200 F

>200 F    ✓

BTU/lb. ~6000

Ash(%)

Water(%)

pH (avg)

Range

6

to 8

Reactivity (Reactive with):

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

Metals (ppm)

Total	EP
As	<u>LS</u>
Ag	<u>LS</u>
Cd	<u>LS</u>
Ba	<u>LS</u>
Pb	<u>LS</u>

Total	EP
Cr(Total)	<u>LS</u>
Cr(Hex)	<u>LS</u>
Hg	<u>LS</u>
Se	<u>LS</u>

Total	Total
Be	<u>&lt;10</u>
Ti	<u>&lt;10</u>
Sb	<u>&lt;10</u>
S	<u>&lt;10</u>
P	<u>&lt;10</u>
Si	<u>&lt;10</u>
Na	<u>&lt;10</u>
Ni	<u>&lt;10</u>
Cu	<u>&lt;10</u>
Zn	<u>&lt;10</u>

Other (Specify in PPM)

Free Cyanide   

PCB's   

Free Sulfide   

Phenolics   

Total Organic Halogens (%)

Fluorine   

Bromine   

Chlorine 50-60%

I certify that all information on this form is complete and correct (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed.

Generators Signature

Date

Information Completed By

Name

L. Gibbs

Title

Date

## MATERIAL PROFILE

CH<sub>2</sub>CH<sub>2</sub> 9-25

Generator Name <u>STUTEX</u>	Technical Contact <u>LENNOR GIBBS</u>	Is Sample Available Upon Request?  Yes _____ No _____
Facility Address _____	Title <u>ENV. SPECIALIST</u>	
_____	Telephone ( ) <u>809 352-8171</u> EXT. <u>4270</u>	
_____	Billing Address _____	
City <u>FREEPORT, GRAND BAHAMAS</u>	_____	
State _____ Zip Code _____	_____	
EPA Identification Number _____	City _____ State _____ Zip _____	

Process Generating Waste PHARMACEUTICAL  
 Rate of Generation \_\_\_\_\_ Container Type/Size \_\_\_\_\_ EPA Waste No. \_\_\_\_\_ State Waste No. \_\_\_\_\_  
 1. Does this waste contain spent solvents (F001 through F005)? Y ✓ N \_\_\_\_\_ Materials listed under the California list? Y ✓ N \_\_\_\_\_  
 2. Is this waste listed for Dioxin as defined in 40 CFR 262.31? (F020 - F023 and F026 - 28) Y \_\_\_\_\_ N ✓  
 3. Is this waste INFECTIOUS? Y \_\_\_\_\_ N ✓ Is it RADIOACTIVE? Y \_\_\_\_\_ N ✓ Does it contain PCB's > 50ppm? Y \_\_\_\_\_ N ✓  
 4. If you answered yes to questions 2 or 3, DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

Chemical Constituents (Must Total 100%)		Physical Characteristics at 70 F	
METHYLENE CHLORIDE	9-25	Physical State: Liquid <input checked="" type="checkbox"/> Semisolid <input type="checkbox"/> Solid <input type="checkbox"/>	
ACETONE	20-45	Layers: None <input checked="" type="checkbox"/> Two <input type="checkbox"/> Multilayers <input type="checkbox"/>	
ETHYL ACETATE	15-30	Free Liquids (%): 100 Precipitated Solids (%): <1	
TETRAHYDROFUR	5-15	Viscosity: Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High <input type="checkbox"/>	
TOLUENE	8-15	Is Material Pumpable? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Polymerizable? Yes <input type="checkbox"/> No <input type="checkbox"/>	
WATER	9-12	Specific Weight (lbs./gal): ~7.0-8.0 OR Specific Gravity(g/cc):	
		Appearance: ~7.0-8.0 Odor:	
		Flash Point(cc): Exact: <60 F 61 F - 100 F	
		101°F - 140°F 141 F - 200 F >200 F	
		BTU/lb. Ash(%) Water(%)	
		pH (avg) Range: 5 to 10	
		Reactivity (Reactive with):	

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

Metals (ppm)						Other (Specify in PPM)	
Total	EP	Total	EP	Total	Total		
As	<5	Cr(Total)	<5	Be	<10	Si	<10
Ag	<5	Cr(Hex)	<5	Ti	<10	Na	<10
Cd	<1	Hg	<0.2	Sb	<10	Ni	<10
Ba	<100	Se	<1	S	<10	Cu	<10
Pb	<5			P	<10	Zn	<10
						Free Cyanide	
						Free Sulfide	
						Phenolics	
						Total Organic Halogens (%)	
						Fluorine	
						Chlorine	
						Bromine	
						PCB's	

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed.

Generators Signature

Information Completed By

Name LEARNOX GIBBS  
Title \_\_\_\_\_ Date \_\_\_\_\_

**MATERIAL PROFILE**

Name of Waste Stream

L A I D L A W Use Only

~~WASTE~~ NAUGAED  
10

Generator Name INDUSTRIAL CHEMICAL CO. LIMITED  
Facility Address P.O. Box F-2514  
FREETOWN, GRAND BAHAMIA  
BAHAMAS  
City \_\_\_\_\_  
State \_\_\_\_\_ Zip Code \_\_\_\_\_  
EPA Identification Number \_\_\_\_\_

Technical Contact MR. KENNETH  
Title \_\_\_\_\_  
Telephone 809 352-7861-2 EXT. \_\_\_\_\_  
Billing Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Is Sample Available Upon Request?

Yes ☒  
No ☐

## Process Generating Waste

Rate of Generation 4000 lbs/day Container Type/Size 55 GALS EPA Waste No. F003 State Waste No. \_\_\_\_\_  
1. Does this waste contain spent solvents (F001 through F005)? Y ☒ N ☐ Materials listed under the California list? Y ☒ N ☐  
2. Is this waste listed for Dioxin as defined in 40 CFR 262.21? (F020 - F023 and F026 - 28) Y ☐ N ☒  
3. Is this waste INFECTIOUS? Y ☐ N ☒ Is it RADIOACTIVE? Y ☐ N ☒ Does it contain PCB's > 50ppm? Y ☐ N ☒  
4. If you answered yes to questions 2 or 3... DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

## Chemical Constituents (Must Total 100%)

<u>METHANOL</u>	<u>77-80</u>
<u>HANDLED PIGMENTS</u>	<u>21-24</u>
<u>ACETIC ACID</u>	<u>&lt;1</u>
<u>LITHIUM ACETATE</u>	<u>&lt;1</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

## Physical Characteristics at 70 F

Physical State: Liquid ☒ Semisolid \_\_\_\_\_ Solid \_\_\_\_\_  
Layers None ☒ Two \_\_\_\_\_ Multilayers \_\_\_\_\_  
Free Liquids (%) 100 Precipitated Solids (%) 0  
Viscosity: Low ☒ Medium \_\_\_\_\_ High \_\_\_\_\_  
Is Material Pumpable? Yes ☒ No \_\_\_\_\_ Polymerizable? Yes \_\_\_\_\_ No ☒  
Specific Weight (lbs./gal) ~ OR Specific Gravity (g/cc) ~.75  
Appearance DARK Odor \_\_\_\_\_  
Flash Point(cc): Exact 52°F <60 F \_\_\_\_\_ 61 F - 100 F \_\_\_\_\_  
101 F - 140°F \_\_\_\_\_ 141 F - 200 F \_\_\_\_\_ >200 F \_\_\_\_\_  
BTU/lb. ~12000-15000 Ash(%) 0 Water(%) 0  
pH (avg) \_\_\_\_\_ Range \_\_\_\_\_ to \_\_\_\_\_  
Reactivity (Reactive with): NONE

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

## Metals (ppm)

Total	EP
As <u>25</u>	
Ag <u>25</u>	
Cd <u>1</u>	
Ba <u>100</u>	
Pb <u>25</u>	

Total	EP
Cr(Total) <u>25</u>	
Cr(Hex) <u>25</u>	
Hg <u>10.2</u>	
Se <u>1</u>	

Total	Total
Be <u>10</u>	Si <u>10</u>
Ti <u>10</u>	Na <u>10</u>
Sb <u>10</u>	Ni <u>10</u>
S <u>10</u>	Cu <u>10</u>
P <u>10</u>	Zn <u>10</u>

## Other (Specify in PPM)

Free Cyanide 0 PCB's 0  
Free Sulfide 0  
Phenolics 0  
Total Organic Halogens (%) 0  
Fluorine 0 Bromine 0  
Chlorine 0

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed

Generators Signature

Joseph A. Spencer 10-1-91  
(203) 573-3357 Date

Information Completed By

Name \_\_\_\_\_ Date \_\_\_\_\_  
Title \_\_\_\_\_

Name of Waste Stream

Nao Gard 76<sup>#</sup>

Generator Name UNITROYAL CHEMICAL CO LIMITED  
Facility Address P.O. Box F-2564  
FREETOWN, GRAND BAHAMA  
BAHAMAS  
City \_\_\_\_\_  
State \_\_\_\_\_ Zip Code \_\_\_\_\_  
EPA Identification Number \_\_\_\_\_

Technical Contact KEN POTTS  
Title \_\_\_\_\_  
Telephone 809 352-7861 EXT. \_\_\_\_\_  
Billing Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Is Sample Available Upon Request?	
-----------------------------------	--

Yes ☒

No ☐

Process Generating Waste CHEMICAL PROCESS (STILL BOTTOMS) Pool  
 Date of Generation 2-5-80 Container Type/Size TT EPA Waste No. F003 State Waste No. \_\_\_\_\_  
 1. Does this waste contain spent solvents (F001 through F005)? Y    N \_\_\_\_\_ Materials listed under the California list? Y \_\_\_\_\_ N \_\_\_\_\_  
 2. Is this waste listed for Dioxin as defined in 40 CFR 262.34? (F020 - F023 and F026 - 28) Y \_\_\_\_\_ N \_\_\_\_\_  
 3. Is this waste INFECTIOUS? Y \_\_\_\_\_ N \_\_\_\_\_ Is it RADIOACTIVE? Y \_\_\_\_\_ N \_\_\_\_\_ Does it contain PCB's > 50ppm? Y \_\_\_\_\_ N     
 4. If you answered yes to questions 2 or 3, DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

Chemical Constituents (Must Total 100%)	
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100	

[illegible]

### Physical Characteristics at 70°F

Physical State: Liquid ☒ Semisolid ☐ Solid ☐  
Layers: None ☒ Two ☐ Multilayers ☐  
Free Liquids (%) 100 Precipitated Solids (%)           
Viscosity: Low ☒ Medium ☐ High ☐  
Is Sample Pumpable? Yes ☒ No ☐ Polymerizable? Yes ☐ No ☒  
Specific Weight (lbs./gal)          OR Specific Gravity(g/cc) 1.75  
Appearance Dark Odor mild  
Flash Point(cc): Exact 520 F <60 F ☐ 61 F - 100 F ☒  
101 F - 140 F ☐ 141 F - 200 F ☐ >200 F ☐  
BTU/lb. 12000 - 15000 Ash(%)          Water(%) < 1  
pH (avg) 6 - 8 Range          to           
Reactivity (Reactive with): NONE

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

## Metals (ppm)

Total	EP
As _____	< 5
Ag _____	< 5
Cd _____	< 1
Ba _____	< 100
Pb _____	< 3

	Total	EP
Cr(Total)	_____	< 5
Cr(Hex)	_____	< 5
Hg	_____	< 0.2
Se	_____	< 1

	Total		Total
Be	<u>510</u>	Si	<u>510</u>
Ti	<u>510</u>	Na	<u>510</u>
Sb	<u>510</u>	Ni	<u>510</u>
S	<u>510</u>	Cu	<u>510</u>
P	<u>510</u>	Zn	<u>510</u>

Other (Specify in PPM)

Free Cyanide \_\_\_\_\_ *none* \_\_\_\_\_ PCB's \_\_\_\_\_ *no* \_\_\_\_\_  
Free Sulfide \_\_\_\_\_ *none* \_\_\_\_\_  
Phenolics \_\_\_\_\_ *none* \_\_\_\_\_

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Total Organic Halogens (%) \_\_\_\_\_  
Fluorine \_\_\_\_\_ *0.2* \_\_\_\_\_ Bromine \_\_\_\_\_ *0.12* \_\_\_\_\_  
Chlorine \_\_\_\_\_ *0.2* \_\_\_\_\_

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed.

Generators Signature

585 0732 (1 91

## Information Completed By

Name \_\_\_\_\_  
Title \_\_\_\_\_ Date \_\_\_\_\_

## MATERIAL PROFILE

Name of Waste Stream

COMBINED STEELWASTES  
#4

LAIDLAW Use Only

Generator Name UNITROL CHEMICAL CO. LIMITED  
Facility Address P.O. Box F-2514  
FREEPORT GRAND BAHAMA  
BAHAMAS  
City \_\_\_\_\_  
State \_\_\_\_\_ Zip Code \_\_\_\_\_  
EPA Identification Number \_\_\_\_\_

Technical Contact KEN POTTS KEN POTTS  
Title \_\_\_\_\_  
Telephone 809 352-7861 EXT. \_\_\_\_\_  
Billing Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Is Sample  
Available  
Upon Request?

Yes ☒  
No ☐

Process Generating Waste CHEMICAL PROCESS STEEL BOTTOMS

- Date of Generation 10/15/91 Container Type/Size \_\_\_\_\_ EPA Waste No. F003, D001 State Waste No. \_\_\_\_\_  
1. Does this waste contain spent solvents (F001 through F005)? Y ☒ N ☐ Materials listed under the California list? Y ☒ N ☐  
2. Is this waste listed for Dioxin as defined in 40 CFR 262.31? (F020 - F023 and F026 - 28) Y ☐ N ☒  
3. Is this waste INFECTIOUS? Y ☐ N ☒ Is it RADIOACTIVE? Y ☐ N ☒ Does it contain PCB's > 50ppm? Y ☐ N ☒  
4. If you answered yes to questions 2 or 3, DO NOT CONTINUE. Please contact your LAIDLAW Technical Sales Representative for assistance

### Chemical Constituents (Must Total 100%)

METHANOL	50-70
HINDERED PHENOLICS	25-35
STEARIC ALCOHOL	<1
ACETIC ACID	<1
LITHIUM ALKYLATE	<1
<del>T-Butanol</del> Heptanes	10-20
<del>HEPTANE</del> T-Butanol	5-15
M-ALKYLATE	<1

### Physical Characteristics at 70°F

Physical State: Liquid ☒ Semisolid \_\_\_\_\_ Solid \_\_\_\_\_  
Layers: None ☒ Two \_\_\_\_\_ Multilayers \_\_\_\_\_  
Free Liquids (%) ☒ Precipitated Solids (%) \_\_\_\_\_  
Viscosity: Low \_\_\_\_\_ Medium \_\_\_\_\_ High \_\_\_\_\_  
Is Material Pumpable? Yes ☒ No \_\_\_\_\_ Polymerizable? Yes \_\_\_\_\_ No ☒  
Specific Weight (lbs./gal) \_\_\_\_\_ OR Specific Gravity (g/cc) NO. 75  
Appearance \_\_\_\_\_ Odor Slight  
Flash Point(cc): Exact 52°F <60 F \_\_\_\_\_ 61 F 100 F \_\_\_\_\_  
101°F - 140°F \_\_\_\_\_ 141 F - 200 F \_\_\_\_\_ >200 F \_\_\_\_\_  
BTU/lb. ~12000 Ash(%) 25 Water(%) 22  
pH (avg) \_\_\_\_\_ Range 6 to 8  
Reactivity (Reactive with) \_\_\_\_\_

(Please Attach All MSDS's, Sample Analysis and Additional Info.)

### Metals (ppm)

Total	EP
As _____	<u>25</u>
Ag _____	<u>25</u>
Cd _____	<u>&lt;1</u>
Ba _____	<u>&lt;100</u>
Pb _____	<u>25</u>

Total	EP
Cr(Total) _____	<u>25</u>
Cr(Hex) _____	<u>25</u>
Hg _____	<u>&lt;100</u>
Se _____	<u>21</u>

Total	Total
Be <u>&lt;10</u>	Si <u>&lt;10</u>
Ti <u>&lt;10</u>	Na <u>&lt;10</u>
Sb <u>&lt;10</u>	Ni <u>&lt;10</u>
S <u>&lt;10</u>	Cu <u>&lt;10</u>
P <u>&lt;10</u>	Zn <u>&lt;10</u>

### Other (Specify in PPM)

Free Cyanide 0 PCB's 0  
Free Sulfide 0  
Phenolics 0  
Total Organic Halogens (%)  
Fluorine 0 Bromine 0  
Chlorine 0

I certify that all information on this form is complete and factual (including attached information) and is an accurate representation of the known and suspected hazards of the waste to be disposed.

Generators Signature

James A. Spencer  
(203) 513 3551

10-1-91  
Date

Information Completed By

Name \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

D. E. R.

**SEP 25 1991**

September 23, 1991

SOUTHWEST DISTRICT  
TAMPA

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Victor San Agustin

Re: Laidlaw Environmental Services of Bartow, FLD980729610  
Draft Hazardous Waste Facility Operating Permit #H053-182726

Dear Mr. San Agustin;

The changes to the above permit presented during your visit to the facility on September 18 should satisfy the concerns of both parties. Since the Department's primary concern is with the tracking and identification of waste containers on site, the tracking systems in use are reiterated here for your reference.

Bulk containers (tanker trucks): Incoming bulk shipments are signed in on the shipping manifest to document the arrival date. The process operating log book (copy enclosed) documents off-loading of the material. The process log book also shows when loading of outgoing tankers begins and ends, and the manifest shows when the full tanker leaves the facility. By comparing the process operating log book with manifests, an inspector can easily determine how long a bulk container has been at the facility.

Drums: The "dump sheet" (copy enclosed) is used to record which drums are removed from the storage building, and the process they are to be used for (fuel blending, reclamation, or shipped elsewhere for disposal). This shows drum numbers, type of waste, and date removed from storage. The process operating log book records when drums for reclamation are pumped into recycling equipment. The log book and manifests also document shipment off-site. Drums removed from storage are normally processed within eight hours (barring equipment breakdown). If drums which have been removed from storage cannot be processed within twenty-four hours, they are placed back into the storage building. No storage of drums which are not in the stages of processing takes place outside the drum storage building.

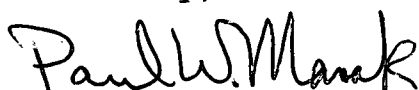
Sample containers: The facility handles two types of waste samples - customer pre-acceptance samples and incoming shipment samples.

Samples sent by prospective customers for approval are marked with the date and waste stream number upon receipt. After verification that the waste profiles are complete, the samples are logged in by the lab for analysis. Upon completion of analysis, the samples are logged back to Customer Service for pricing with the customer. Analysis results and pricing may affect the length of time a sales sample will be held in the laboratory. Upon approval, samples will be placed in the lab storage cabinet for transfer to the drum storage building within seven days.

When a sample of incoming waste is taken, it is assigned a Waste Receipt number. Sample jars are dated upon receipt by the laboratory and entered in the laboratory sample log. Analysis results are recorded and maintained on the Lab Detail Report. Samples are transferred to the drum storage building within seven (7) days of the release date on the Lab Detail Report (copy attached), and stored for thirty (30) days. At the end of the holding period, samples are emptied into 55-gallon drums for processing on-site or disposal elsewhere.

We will arrange for publication of the Public Notice for September 27. We appreciate the Department's cooperation in the writing and editing of this permit, and if you have any questions please contact me or Steve Taylor at (813) 533-6111.

Sincerely,



Paul W. Manak

PWM/drs

cc: James Scarbrough, USEPA Region IV  
Satish Kastury, BWPR, FDER, Tallahassee  
Steve Taylor, LES  
Ashley Chadwick, LES

1700A

Generator Process Sheet

Supervisor

Date

Shift



9-17-91  
3rd

2nd Continued to run Column 1,1,1 product  
 → T-310 Cuts → T-208 product → T-310. PDS# I-98  
 Pumped vacuum still → T-106 Perc bottoms.  
 Blew R-2 → T-106. Pumped 1400 gal H<sub>2</sub>O + 20)  
 → S-101. Started up vacuum still H<sub>2</sub>O PDS# K-59  
 Cuts → T-105. product → T-302 Shut down  
 Column. Steamed and ~~drummed~~ column.  
 Started blowing R-3 → T-103.

9-13-91

3rd

Cont. to run vacuum still water pds. K-59  
 water → T-302 cuts → T-105 total gal prod 490  
 started trans R-3 → T-103 had problems with  
 it all night. Trans T-207 → S-101 water  
 939 gal.

1st

Loaded @ 5200 gals on to Suttles tanker, H<sub>2</sub>O from  
 T-205. Cont. to try and trans. R-2 → T-103 & T-109. THERE  
 is 6'10 outage in T-109. Still going into T-103. TRANS. 751  
 gals from S-302 → T-208, III bottles. Refilled bfw tank  
 for boiler. ☺

2nd

9-16-91

3rd

Helped S & R  
 D.B. pumped 14 drums of FIF → T-401 plus  
 previous gal from 2nd shift. Trans. T-302 → T-401  
 1372 gal water. Freon was good before working  
 Blew down boiler and work in D.B.  
 remainder of the night. \* R-3 missing a sight  
 glass.

1st

Started a C.T. And added chem. Drummed off 34 drums of III  
 from T-310. Drummed off 7 drums of Tric from T-303.

2nd

Pumped T-401 Freon → T-203. Pumped  
 S-101 H<sub>2</sub>O → T-207. D.S. Pumped 4  
 drums → T-401. Started up TFE. T-410 →  
 TFE → T-204 bottles → R-2 PDS# I-99.

\* Pumped all of R-2 → R-3 1st

2nd

## Process Log

171

9-17-91

3<sup>rd</sup>

Pls I-99(1,1,1) T-110 → TFE → T-204 Botts →  
R-2 is complete. pumped 17 drums of M.C. →  
S-101, started up Vacuum still pls C-31  
prod → T-206

I-98

-59

9  
d 4/90  
with

1<sup>st</sup>

Cont. to run S-101 #91-C-31, (M.C.) → T-206. TRANS. 784 gals  
from T-301 → T-304, mix. sol. and sampled T-304 → Lab.  
Shut ↓ S-101, run complete. Blew M.C. botts from S-101 →  
R-2. TRANS. 1450 gals of Acetone from T-101 → S-101 and  
started A. #91-A-8. Prod → T-301. Started ↑ TFE. T-109 →  
TFE → T-209. Botts → R-2. Ran tests on boiler h<sub>2</sub>O, All in  
Range.

2<sup>nd</sup> Continued to run H-201; TFE (Fuel) T-109 →  
TFE → T-209, bottoms → R-2 PDS #  
K-60. Pumped 846 gal T-101 → S-101  
(Acetone) and restarted Vacuum still  
product → T-201. Pumped 3161 gal  
T-203 → S-302 (Freon) Started up  
Column PDS # F-28 product →  
T-308. Shut down Vacuum  
Still, (run complete). Started  
pumping S-101 → T-102 (acetone bottoms)

9-18-91

Cont. to run TFE pls K-60 (Fuel) T-109 → TFE → T-209  
run complete, T-109 15' outage. switched → T-110

III pls I-100, T-110 → TFE → T-204. Botts → R-2.

Cont. to run column pls F-28 (FTF) prod → T-308  
run complete, S-302 has approx. 1200 gal left. attempt to complete  
trans of S-101 → T-102 switched → T-109 line is  
clogged.



CONT TO RUN TFE. 91-I-100. T110 → TFE → T204. Bot to R2.  
CLEANED S-101 → 40 drums. Loaded 3600 gal → BENCO TANKER.  
MC. STARTED PUMPING FLEXO TO S-101, SHUT DOWN TFE,  
RUN COMPLETE.

2<sup>nd</sup>

Pumped Flex-O → S-101 Pumped Freon → T-401  
Helped D.S.

T-401  
going  
right

# Supervisor's Log

5 over 1 YR. OLD  
Full-Area cleaned  
OLIVER DID NOT  
AD - LEFT INFO

that we have manifest  
on the truck before  
manifests truck  
was manifested for  
it. Fuel to 103  
for Giant  
Service 5453 gallons

AND SAID TMC  
The morning.  
SHIFT. All 3 Tankers  
The LAB PACKS ARE  
3 - AREA cleaned  
PUT ON EVANS TRAILER  
EL DUMPS. When T103

ed Ray to circulate  
preparation for  
M

109 BEING USED AT P  
US + CUTTING UP PLASTIC  
EVANS TRAILER

S NOT WORKING  
oaded TERRA TRUCK  
EMPTIES (55 GAL MET

T102 circulated & FILTERED!  
T103 SAMPLE TAKEN TO LAB

9-5-91 Fuel to T-103 MC to Vacuum Still  
TMC to Vacuum Still after  
Two Terra Trucks ~~is~~  
will be in this evening. Need to  
load #1 T-106 2200gal T-102 2800  
#2 T-106 2200 T-102 2800 or T-105

9-5-91 Tankers to Systec LEFT OK - Drum Truck  
(68 drums) UNLOADED. BOTH TANKERS TO  
OLIVER LOADED - 1 TANKER WAS 3.2 CL2.  
DOUG TO TAKE 800 GALS OUT OF TANKER, PUT INTO  
T106, AND LOAD BACK OUT OF T105.

9-6-91 Fuel to T-102 Load the Laidlaw  
TANKERS' for Giant, use the same  
recipe for both loads T-106 1000 gal  
T-104 2000 T-103 - 2000 gal. Only one  
will go out Monday.

WES Please have Doug or Jeff  
adjustate the Laidlaw TANKER in front  
of the T-100s before it is picked  
up it will be picked up at  
3:00 AM.

9-6-91 Jeff - Please have HANDLES PUT ON BASKETS  
(1/8 screens) FOR FILTERS, T112 LINE FROM  
POT TO FILTER PLUGGED - HAD TO BE cleaned.  
THANKS FOR CHANGING LOCK TO TOOL CRIB. A  
LOT OF TIME WAS LOST TRYING TO GET IN.  
T114 (#3) WAS NOT SET UP, ~~OR~~ Ready TO GO.  
HAD TO REPAIR TOP OF FILTER (BRACKED)

# Laidlaw Environmental Services of Bartow, Inc.

PM

## Lab Detail Report

```
=====
Manifest Number
Receipt Code      Lab Rpt Code      Receipt Date      PM
Customer Code
Generator Code
Stream Code
Lab Report Date   Prepared By      Tolerance
Num Drums Tested  Tot Num Gallons
Released          PM      Layers      pH
EPA Waste Codes   % Free Liquid
Remarks  WR#      1 of      drums total
=====
```

```
=====
Drum  Proc      Spec      Sludge
No    Type      Gals    Grav.  Pounds  Appearance  Inches  Sign  Handler
=====
```

```
=====
Ln  Compound  Description      LAB      LAB      Stream Sample #
                        PPM      PCT      PCT      LOW      HGH
=====
```

```
=====
Ln  Compound  Description      LAB      LAB      Stream Sample #
                        PPM      PCT      PCT      LOW      HGH
=====
```

BTU per Gallon Value for this Lab Report is:  
 BTU per Pound Value for this Lab Report is:  
 Recommended For Processing:

D. E. R.

SEP 16 1991

SOUTHWEST DISTRICT  
TAMPA

VIA CERTIFIED MAIL

September 13, 1991

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Victor San Agustin, Waste Management

Re: Laidlaw Environmental Services of Bartow, FLD980729610  
Draft Hazardous Waste Facility Operating Permit #H053-182726

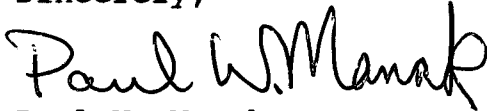
Dear Mr. San Agustin;

The draft permit referenced (as received September 12) has been reviewed and some changes must still be made before the document is acceptable for public notice.

1. Page 10 of 17: #11 should refer only to RCRA-regulated containers (bullet #1).
2. Page 12 Of 17: #5, We maintain that samples are not hazardous wastes as defined in 40 CFR 261.3, and are therefore not subject to RCRA regulation. It would also appear that if samples were intended to be included in such a tracking system, regulations would have been previously established. Our samples are currently tracked, handled, and disposed of in a responsible and timely manner, making further regulation an unnecessary burden on the facility. Additionally, it is in the best interest of the company to remove such samples at the soonest possible time due to storage availability.
3. Page 12 of 17: #4 - The wording of the previous draft was less ambiguous as to allowing bulk shipments to remain on site for up to ten days. Please add to the first sentence "except as an integral part of shipment".
4. Page 13 of 17: #6 Existing operating records and waste movement tracking records are adequate to verify movement of containers.

Enclosed for your information is the cleaning policy for sludge mix tanks T-111, T-112, and T-114. Be advised that the use of solvents or sandblasting to clean the equipment results in increased air emissions over scraping and wiping. The daily inspection form (Figure 6.1) should be adequate to record relative cleanliness of the tank systems under "Evidence of Waste Release".

Sincerely,


A handwritten signature in black ink, reading "Paul W. Manak". The signature is written in a cursive, slightly slanted style.

Paul W. Manak  
Facility Manager

PWM/drs

cc: Steve Taylor  
Ashley Chadwick

1677A

TO: P. W. Manak  
FROM: Larry A. Becker   
LOCATION: Bartow  
SUBJECT: Revised Housekeeping Procedures  
DATE: September 10, 1991

Per your request, I have up-dated and expanded our housekeeping list and procedures for all RCRA fuel blend, processing, and storage areas as indicated below:

1. Daily

The following is to be done 1 hour before each shift ends:

1. Sweep all of Fuel Blending floors
2. Pick up any items not needed
3. Sweep and inspect Drum Storage and Staging
4. Clean pan under Pegasus
5. Wipe down valve handles
6. Remove full satellite drums to storage
7. Sweep general area of dock
8. Empty all non-hazardous trash

2. Weekly

1. Sweep out all containment areas
2. Wipe down and sweep all transfer stations
3. Sweep complete driveway

3. Monthly

Every 4th Saturday an 8 man clean-up crew completes the following assignments:

1. Clean all handrails
2. Remove any debris from all catwalks
3. Clean control switches and buttons
4. Wipe down, scrape, and power wash all Fuel Blending equipment, piping, valves, pumps, filters, hoses and tools

4. As Needed Tasks:

1. Pump rain water from all containments and sumps
2. Paint equipment and structures
3. Scrape and power wash all concrete areas, excluding driveway

LB/drs

cc: Jim Green  
Steve Taylor

1679A



*Florida Department of Environmental Regulation*

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

DATE: Sept 5, 1991

TIME: 12:00 AM

SUBJECT: Laidlaw Env Sw (75) <sup>BARTOW</sup>

A T T E N D E E S

Name \_\_\_\_\_

### Affiliation

Telephone

[illegible]

WASTE MANAGEMENT SECTION ROUTING & TRANSMITTAL SLIP

A

PLEASE READ THE ATTACHED, INITIAL, AND PASS ON TO THE NEXT PERSON.  
THANK YOU.

BILL K. \_\_\_\_\_

JULIET G. \_\_\_\_\_

MICHELE H. ✓NANCY E. KBEMARY Y. ✓VICTOR S. VSA

BILL C. \_\_\_\_\_

STEVE M. ✓

SANDRA T. \_\_\_\_\_

PAULA D. \_\_\_\_\_

DIANE T. DTRICHARD P. ✓STEPHANIE H. SSHBETH K. ✓NEAL S. NLAUREL L. LLLYNNE M. ✓

KIM F. \_\_\_\_\_

MIKE S. ✓Bil D

ANNA B. \_\_\_\_\_

BETTY R. \_\_\_\_\_

Note: Has not been changed in GMS, I notified Steve Taylor of Tricil to submit name change to Tallahassee. He also needs to submit name change for their transporter ID.

SD

Return letter to B. Conf'



Resource Recovery

D. E. R.

AUG 23 1991

SOUTHWEST DISTRICT  
TAMPA

ATTENTION ALL CUSTOMERS AND VENDORS

\*\*\*EFFECTIVE IMMEDIATELY\*\*\*

FLD 980729610

Tricil Recovery Services, Inc. is now officially  
Laidlaw Environmental Services of Bartow, Inc.

Our current address: 170 Bartow Municipal Airport  
Bartow, Florida 33830

Please change your records accordingly.

If you have any questions please contact us at  
(813) 533-6111.

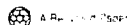
1447A

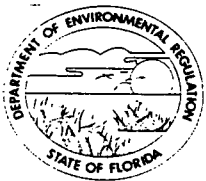


**Ashley T. Chadwick**  
Southeast Regional  
Environmental Manager

Laidlaw Environmental Services, Inc.  
Airpark Business Center  
1420 Donelson Pike, Suite A-5  
Nashville, Tennessee 37217

Wats 1.800.235.6589  
Phone 1.615.399.8791  
Fax 1.615.399.1120





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, BWP&R  
THRU: Bill Kutash, Administrator *WJK 8/16/91*  
FROM: Victor San Agustin, P.E. *VSA 8/15/91*  
RE: Draft Operating Permit Renewal, HO53-182726  
Laidlaw Environmental Services of Bartow

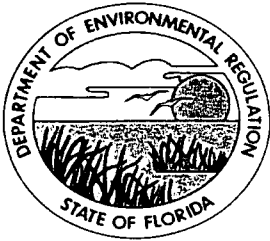
Enclosed for your review and comment are copies of the following:

- a. EPA/FDER Intent to Issue
- b. Public Notice of Proposed Agency Action - Radio Announcement
- c. Public Notice of Proposed Agency Action - Newspaper Publication
- d. Draft Operating Permit

Please review the draft and provide your comments to me within 7 days. I am also providing EPA Region IV a copy with this letter. If you have any questions, please call.

VSA/br  
Enclosures

cc: James Scarbrough, USEPA/Region IV



# 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

AUG 16 1991

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

A, 4-c

Re: Draft Operating Permit Renewal, HO53-182726

Dear Mr. Manak:

Enclosed for your review is a copy of the above referenced draft operating permit. This letter is to request that you review the draft and consolidate your comments. Subsequently, we would like to arrange a meeting with you to discuss your comments and hopefully resolve any issues that may arise.

Please call me at (813) 623-5561, ext. 390 after you have reviewed the draft so we can schedule meeting.

Sincerely,

Victor San Agustin, P.E.  
Professional Engineer II  
Division of Waste Management

VSA/ab

cc: Satish Kastury, BWP&R  
James Scarbrough, USEPA IV

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

IN THE MATTER OF AN  
APPLICATION FOR A PERMIT BY:

DER FILE NUMBER: HO52-182726  
EPA FILE NUMBER: FLD980729610

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

**DRAFT**

Attn: Paul Manak, Facility Manager

INTENT TO ISSUE

The Department of Environmental Regulation (DER) and United States Environmental Protection Agency (USEPA) hereby give notice of their Intents to Issue, and request the publication and notice for the above referenced permits. Upon issuance of these permits, the Department and USEPA will authorize the permittee to operate a hazardous waste storage and fuel blending facility at 170 Bartow Municipal Airport, Bartow, Polk County, Florida. A description of this hazardous waste facility's components and operation can be found in pages 1 and 2 of the enclosed draft permit HO53-182726.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

The Department is taking this action under the authority of Section 403.722, Florida Statutes (F.S.), and Florida Administrative Code Chapters 17-4 and 17-730, (F.A.C.), which provide for issuance of permits to facilities that treat, store, or dispose of hazardous wastes. The issuance of this permit is based on the applicant's demonstration that this facility is in compliance with the technical and procedural requirements established in Chapter 17-730 F.A.C. and the appropriate Sections of 40 CFR Parts 260 through 266, which were adopted by reference in Chapter 17-730 F.A.C. This demonstration was made in the approved application submitted with DER Form 17-730.900(2) on June 26, 1990, and amended on December 10, 1990, January 18, 1991 and June 21, 1991.

Pursuant to Sections 403.815 and 403.722, F.S., and 17-730.220(6), F.A.C., you are required to publish at your own expense notice for the Department's and EPA's Intent to Issue hazardous waste operation permits to Laidlaw Environmental Services of Bartow, Inc. to operate a hazardous waste storage and fuel blending facility at 170 Bartow Municipal Airport, Bartow, Polk County, Florida.

Pursuant to Section 17-730.220(6), F.A.C., the attached notice must be published one time only in the legal ad section of a major local newspaper of general circulation in Polk County and broadcast over a local radio station within thirty (30) days from receipt of this letter. Proof of publication and broadcast must be provided to the Department within fourteen (14) days of publication of the notice.

Failure to publish the notice and provide proof of publication and broadcast within the allotted time may result in denial of the permit.

The Department and EPA shall issue their respective permits with the attached conditions unless an appropriate petition is filed. Any interested person may submit comments on the draft state permit and may file a petition for a hearing pursuant to the provisions of Section 120.57, F.S. At a formal hearing under Section 120.57(1), F.S., all parties shall have an opportunity to present evidence and argument on all issues involved, to conduct cross-examination and submit rebuttal evidence, to submit proposed findings of fact and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel. At an informal hearing under Section 120.57(2), F.S., the Department will provide affected persons or parties an opportunity to present evidence or a written statement in opposition to the agency's action.

Petitions for hearing must comply with the requirements of Section 28-5.201 F.A.C., and be filed with the Office of General Counsel or the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant must be filed within forty-five (45) days of receipt of this letter. Petitions filed by other parties, or requests for public meetings by persons, must be filed within forty-five (45) days of publication or broadcast of the public notice. Any interested person may submit comments on the draft federal permit any may request a hearing



pursuant to 40 CFR (p)124.11. The hearing request must be in writing and should be addressed to Mr. James H. Scarbrough, U.S. EPA, at 345 Courtland Street, N.E., Atlanta, Georgia 30365 within 45 days of this notice. Petitions or requests for the meetings which are not filed in accordance with the above provisions are subject to dismissal.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

Richard D. Garrity, Ph.D.  
Director of District Management  
Department of Environmental  
Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

This is to certify that this NOTICE OF INTENT TO ISSUE was mailed before the close of business on the date indicated on the return request form.

---

Signature

PUBLIC NOTICE OF PROPOSED AGENCY ACTION  
Radio Announcement

DRAFT

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
(813) 623-5561

The Florida Department of Environmental Regulation and the U.S. Environmental Protection Agency give notice of their Intent to Issue joint permits under the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984, Section 403.722, Florida Statutes, and Chapter 17-4 and 17-730 of the Florida Administrative Code to Laidlaw Environmental Services of Bartow, Inc. for the operation of a hazardous waste storage and fuel blending facility at 170 Bartow Municipal Airport, Bartow, Polk County, Florida. The two permits, if issued, will constitute the RCRA permit required by Florida DER and the U.S. EPA.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

A person whose substantial interests are affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes. If a petition on the Department's permit is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final agency action may be different from the position taken in this preliminary statement. Additionally, persons who support the proposed agency action may also wish to intervene in the proceeding.

For more information concerning the applicable requirements of the petitioning process and the necessary time frames for filing, please contact the Tampa District Office at 813/623-5561. The application and a copy of the State permit are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at either:

Florida Department of Environmental Regulation  
Southwest District Office  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
(813) 623-5561.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR (p)124.11. The hearing request must be in writing and should be addressed to Mr. James H. Scarbrough, U.S. EPA at 345 Courtland Street, N.E., Atlanta, Georgia 30365 within 45 days of this notice.

NEWSPAPER PUBLICATION

JOINT PUBLIC NOTICE OF  
PROPOSED AGENCY ACTIONS

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION  
SOUTHWEST DISTRICT  
4520 OAK FAIR BOULEVARD  
TAMPA, FLORIDA 33610-7347  
813/623-5561

**DRAFT**

In conjunction with the

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
REGION IV, RCRA  
345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365  
404/347-3016

DER FILE NUMBER: HO53-182726

EPA FILE NUMBER: FLD980729610

INTENT TO ISSUE

THE FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION (FDER) AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY (U.S. EPA) GIVE NOTICE OF THEIR INTENT TO ISSUE JOINT PERMITS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), AS AMENDED BY THE HAZARDOUS AND SOLID WASTE AMENDMENTS OF 1984, SECTION 403.722, FLORIDA STATUTES (FS), AND CHAPTERS 17-4 AND 17-730 OF THE FLORIDA ADMINISTRATIVE CODE (FAC) TO Laidlaw Environmental Services of Bartow, Inc., 170 Bartow Municipal Airport, Bartow, Polk County, Florida 33830-9504, having the assigned facility I.D. number FLD 980 729 610. The two permits, if issued will constitute the RCRA permit required by Florida DER and the U.S. EPA.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

The draft state permit HO53-182726 is for the continued operation of a hazardous waste storage and fuel blending facility. Hazardous waste storage includes storage in tanks and containers. Hazardous wastes which are amendable for use as fuels are processed in the fuel blending area. Fuel blending includes operation of mixing tanks, grinders, filters, agitators, pumps, a shredder, a drum scraping machine, and other ancillary equipment.

The draft HSWA permit FLD980729610 addresses the identification of 12 solid waste management units (SWMU) and 1 area of concern (AOC). This permit shows US EPA has determined 11 of the SWMU's and the AOC do not substantiate evidence of either a prior release or the need for corrective action at this time. SWMU #9, a fume hood drain collection tank warrants further assessment to characterize the waste material and the pathway and extent of releases to soils, groundwater, air and surface water.

The draft HSWA permit also enforces provisions of HSWA which are applicable to the facility. These provisions include Section 3005(h)-Waste Minimization Certification, Section 3004(d)-Land Disposal Restrictions, 40 CFR 264, Subparts AA and BB-Standards for Process Vents and Equipment Leaks, and 40 CFR 261.24-Toxicity Characteristic Rule.

The application and a copy of both state and federal proposed permits are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Florida Department of Environmental Regulation, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

The proposed U.S. EPA permit and statement of basis are available for public inspection Monday through Friday, except legal holidays, from 8:00 a.m. to 5:00 p.m. at the U.S. EPA Library, 345 Courtland Street, N.E., Atlanta, Georgia 30365. All data submitted by the applicant to the U.S. EPA is available as part of the administrative record at the above address.

Any interested person may submit written comments on this proposed State agency action to the Department of Environmental Regulation, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347, or the proposed U.S. EPA action to the U.S. Environmental Protection Agency, Region IV, 345 Courtland Street, N.E., Atlanta, Georgia 30365 Attention: Mr. James H. Scarbrough, within forty-five (45) days of publication of this notice. All comments on the facility will be considered by both agencies in formulating a decision on issuing the respective permits.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-103, and 28-5, Florida Administrative Code. Any person may request a public meeting pursuant to Section 403.722(10), Florida Statutes. The request for a hearing or meeting must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone

Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within forty-five (45) days of publication of this notice. Failure to file a request for hearing within this time frame shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, FS, or a meeting under Section 403.722(10), Florida Statutes.

If a petition on the Department's permit is filed, the administrative hearing process is designated to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Persons whose substantial interests have been affected by any decision of the Department have the right to intervene in the proceeding. A petition for intervention must be filed pursuant to Section 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer, if one has been assigned, at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR 124.11. The hearing request must be in writing and must include a written notice of opposition to the draft federal permit. Hearing requests should be addressed to Mr. James H. Scarbrough, U.S. EPA, at the above address within 45 days of this notice.

A copy of the proposed U.S. EPA permit may be obtained by contacting Mr. James H. Scarbrough, U.S. EPA at the above address. A nominal fee for copying and/or mailing may be charged.



# 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

**PERMITTEE:**

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

Attn: Mr. Paul Manak  
Facility Manager

**DRAFT**

**PERMIT/CERTIFICATION:**

I.D. Number: FLD 980 729 610  
Permit No.: H053-182726  
County: Polk  
Issue Date: DRAFT #1  
Expiration Date:  
Latitude / Longitude:  
27°57'05"N / 81°47'09"W  
Section / Township / Range:  
23 / 29S / 25W  
Project: Operation of a  
Hazardous Waste  
Storage and Fuel  
Blending Facility

This permit is issued under the provisions of Chapter 403.722, Florida Statutes, and Florida Administrative Code Rules 17-730. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To operate a hazardous waste storage and fuel blending facility located at Avenue D North, Bartow Municipal Airport in Bartow, Polk County, Florida.

Permitted hazardous waste storage includes storage in tanks and containers. Container storage is conducted in the southern half of a roofed drum storage building. Activities in the northern portion of the building include drum staging and fuel blending. The building dimensions are 125 feet 3 inches by 120 feet 3 inches. Drums storage capacity is 81,180 gallons or 1,476-55 gallon drums. The drum storage area consists of 15 rows of palletted drums. Each linear row may have up to 11 pallets. Drums are stacked 4 to a pallet and up to 2 pallets high. Minimum aisle space at the storage area is 3 feet. All drums are stored under sprinklers.

Storage in tanks includes ten 6800 gallon tanks designated as T-101 to T-110, and two 7,000 gallon bottoms tanks designated as R-202 and R-203. Blending of hazardous waste fuels in tanks includes one 680 gallon tank designated as T-111 and two 980 gallon tanks designated as T-112 and T-114.



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Tanks T-101 to T-110 are situated on a 12 inch thick concrete slab with dimensions of 55 feet 4 inches by 22 feet 8 inches. This area is designated as the South Tank Farm. The perimeter of this storage area is provided with a 16 inch high reinforced concrete block wall. Storage in each tank must have a 2 foot minimum freeboard. Total storage capacity is 60,000 gallons. Secondary containment volume is 12,258 gallons.

Bottoms tanks R-202 and R-203 are situated in the West Tank Farm along with ten non-RCRA intermediate product tanks. The tanks receive bottoms materials from various waste recycling operations within the facility. The working volume in each 7,000 gallon tank is 6,300 gallons.

Fuel blending tanks T-111, T-112 and T-114 and associated ancillary equipment are situated in the fuel blending area located inside the northwestern portion of the drum storage building. Associated ancillary equipment include the following:

- a. Tank agitators A-111, A-113 and A-141
- b. Drum unloading pumps P-105 and P-107
- c. Drum unloading filters K-103 and K-105
- d. Basket Filters K-128, K-144 and K-129
- e. Heavy fuels blend pump P-117
- f. Transfer pumps P-126 and P-109
- g. Magnetic Separators K-124 and K-115
- h. Solids Grinders G-116 and G-125
- i. Shredder G-123 with Hopper M-122
- j. Pegasus drum scraping machine L-157
- k. All other associated piping

Wastes codes accepted and stored at this facility are as follows:

D001, D004, D005, D006, D007, D008, D009, D010,  
D011, D018, D019, D022, D023, D024, D025, D026,  
D027, D028, D029, D030, D032, D033, D034, D035,  
D036, D040, D041, D042  
F001, F002, F003, D005, F037, F038, F039  
K048, K049, K050, K051, K052, K083, K086  
U002, U019, U031, U037, U044, U057, U070, U077,  
U080, U112, U117, U121, U140, U154, U159, U161,  
U171, U196, U210, U211, U220, U226, U227, U228,  
U239, U359

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The following submittals were used in preparation of this document and are considered part of the permit application:

- June 22, 1990 letter requesting for renewal of operating permit HO53-86011A. Letter includes completed certification page 27 of 27 of DER Form 17-730.900(2).
- Response to the Department's August 13, 1990 NOD dated December 10, 1990 and related attachments.
- Supplemental response to the Department's August NOD. Response is dated January 17, 1991 with related attachments.
- FDER letter dated December 19, 1990 requesting guidance pertaining to regulation of fuel blending equipment.
- USEPA letter dated February 4, 1990 responding to FDER's December 19 letter.
- Amended RCRA Part B permit renewal application submitted June 21, 1991.

Permit History:

<u>Type</u>	<u>Number</u>	<u>Issued Date</u>	<u>Expiration Date</u>
Construction	HC53-60967	6/23/83	12/31/84
Operating	HO53-86011	11/6/85	11/6/90
Operating	HO53-86011A	5/15/89	11/6/90

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by any order from the Department.

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GENERAL CONDITIONS: (cont'd)

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- (a) a description of and cause of non-compliance; and
- (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

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GENERAL CONDITIONS: (cont'd)

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

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GENERAL CONDITIONS: (cont'd)  
14. (cont'd)

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - the date, exact place, and time of sampling or measurements;
  - the person responsible for performing the sampling or measurements;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

16. In the case of a hazardous waste facility permit, the following permit conditions shall also apply:

a. The permittee will submit the following reports to the Department:

- (1) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within 15 days after receiving the waste, the permittee shall immediately submit a letter report including a copy of the manifest to the Department.
- (2) Unmanifested waste report: The permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.

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GENERAL CONDITIONS: (cont'd)

16.a. (cont'd)

- (3) Annual report: An annual report covering facility activities during the previous calendar year must be submitted in accordance with Florida Administrative Code Rule 17-730.

b. Notification of any non-compliance which may endanger public drinking water supplies, or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be verbally submitted to the Department within 24 hours and a written submission provided within 5 days. The verbal submission within 24 hours shall contain the name, address, I.D. number and telephone number of the facility and owner or operator, the name and quantity of materials involved, the extent of injuries (if any), an assessment of actual or potential hazards, and the estimated quantity and disposition of recovered material. The written submission shall contain the following:

- (1) a description of any cause of non-compliance; and
- (2) if not corrected, the anticipated time the non-compliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

c. Reports of compliance or non-compliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

d. All reports or information required to be submitted to the Department by a hazardous waste permittee shall be signed by a person authorized to sign a permit application.

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:  
Part I. General

1. The permittee shall notify the Department in writing at least four weeks in advance of receiving hazardous waste from a foreign source (§264.12(a)).
2. The permittee shall inspect and analyze each hazardous waste received at the facility to determine whether it matches the identity of the waste specified on the Material Profile Sheet, Toxicity Characteristic Certification Form, or on any prior additional test information pertaining to the waste (§264.13).
3. 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 wastes, 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).
4. The permittee shall maintain security at the facility as described in Chapter 7 of the permit application and as well as specified in §264.14.
5. The permittee shall inspect the facility operating, emergency, and safety equipment and conduct general inspections as described in Figures 6.3 and 6.4 of the permit application. Changes, additions, or deletions to the inspection procedures must be approved in writing by the Department. The schedule must be maintained as part of the operating record of the facility (§264.15).
6. Facility personnel must successfully complete the approved training program indicated in Sections 8.1 and 8.2 of the permit application. New employees must complete training described in Section 8.1 within 180 calendar days. Verification of initial and annual training must be kept with the personnel training records and maintained on site. Personnel shall not work unsupervised until training has been completed (§264.16).
7. The facility shall be operated and maintained to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or surface water which could threaten human health or the environment (§264.31).
8. The contingency plan must be amended and distributed to the appropriate agencies if any criteria in §264.54 are met. Amendments to the plan must be approved in writing by the Department.



PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

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SPECIFIC CONDITIONS:

Part I. General (cont'd)

9. The permittee shall follow the emergency procedures described in Chapter 9 - Contingency Plan of the permit application. The permittee shall give proper notification if an emergency situation arises and must submit to the Department within 15 calendar days a written report which includes all information required under §264.56(j).

10. The permittee shall, upon discovering a significant discrepancy, attempt to reconcile the discrepancy with the waste transporter or generator. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to the Department a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue (§264.72(b)).

11. The permittee shall keep written operating records which include:

- Movement and holding times of containers situated outside of the permitted container storage area;
- The results of all waste analysis;
- A summary report and details of incidents that require implementation of the Contingency Plan;
- Copy of manifests;
- Closure plan and updated closure cost estimate;
- Description and quantity of each hazardous waste received, and the method(s) and date(s) of its blending or storage at the facility;
- Location of each hazardous waste within the facility and quantity at each location;
- Records and results of inspection (retained 3 years);
- Results of tanks, emissions, or leak testings;
- Biennial report.

These records must be maintained at the facility until completion and certification of closure.

12. The permittee shall certify to the Department no less often than annually, that the permittee has in place a program to reduce the volume and toxicity of hazardous waste that the permittee generates to the degree determined by the permittee to be economically practicable; and that the method of treatment or storage is the best practicable to minimize the present and future threat to human health and the environment as required by 40 CFR Part 264.73(b)(9).

13. The permittee shall notify the Department of any Solid Waste Management Units (SWMU) that are not listed on pages D-6 and D-7 of FDER Application form number 17-730.900(2).

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

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SPECIFIC CONDITIONS:

Part I. General (cont'd)

14. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating the name and date of the document submitted, the number(s) of the specific condition(s) affected, and number and project name of the permit involved.
15. The permittee shall comply with the required notice of §264.12(c) and 17-730.300, FAC before transferring ownership or operation of the facility during its operating life.
16. The permittee shall apply for a closure permit at least one hundred and eighty (180) calendar days prior to beginning closure at the facility as required by Florida Administrative Code Rule 17-730.260.
17. The permittee shall apply for an operating permit renewal at least one hundred thirty five (135) days before the expiration date of this permit, and comply with all other requirements of the Florida Administrative Code Rule 17-730.300.
18. The Department may modify the conditions of this permit if any of the conditions of Florida Administrative Code 17-730.290(1) apply.
19. 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 1,476 - 55 gallon drums.
2. Container storage shall always be conducted on pallets with a maximum of 4 drums 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. Minimum aisle space between drums or between drums and adjacent walls shall not exceed 3 feet.

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
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SPECIFIC CONDITIONS:

Part II. Containers (cont'd)

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 containers shall be situated on pallets during staging. The maximum time in which any container may be situated in this area shall not exceed 24 hours. Drum stacking is not allowed in this area.

4. Storage of any incoming or outgoing regulated bulk container shipments within the facility is not allowed. Storage of any container situated outside of the container storage/staging and fuel blending areas whether located inside a vehicle or elsewhere in the facility is also not allowed. The maximum time in which any container may be situated outside the container storage/staging and fuel blending areas shall not exceed 24 hours. The maximum time in which any container may be situated inside the fuel blending area shall not exceed 8 hours. This condition does not apply hazardous waste satellite collection containers or to hazardous waste sample containers each 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 be allowed. The maximum time these sample containers may be situated outside of the container storage area shall not exceed 30 days.

6. For purposes of tracking compliance with the maximum holding times stated in Specific Conditions II.3, II.4, and II.5, the movement and holding time of sample containers, drums, and bulk containers outside of the container storage area, but within facility boundaries shall be tracked in an operating record. An operating record shall be submitted for Department approval no later than 30 days after issuance of this permit. Use of the operating record shall be implemented no later than 30 days after Department approval.

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:

Part II. Containers (cont'd)

7. The permittee may store non-regulated materials in the regulated storage area provided:

- a. The permittee complies with the requirements of §264.175 and includes the volume of non-regulated materials in calculating the total volume of liquid to be stored in the regulated storage area.
- b. The permittee shall maintain the required aisle spacing in the storage area for both the regulated and non-regulated materials in accordance with §264.35.
- c. The permittee ensures that non-regulated materials shall be separate and apart from regulated waste and shall have signs posted indicating the contents of the containers and that the wastes are non-hazardous.
- d. The permittee provides a written notice in the facility operating record of any non-regulated materials in the regulated storage area. The notice shall include:
  - the type and the quantity of the wastes,
  - verify adequate secondary containment,
  - confirm that appropriate aisle spacing is available, and
  - document compatibility of the non-regulated waste with all other wastes already present in the storage area.

8. 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 as per §§264.171, .172 and .173.

9. The permittee shall inspect the container handling and storage areas in accordance with the procedures noted in Figure 6.2 of the application entitled, "Weekly Container Storage and Driveway Inspection Checklist."

10. The permittee shall remove spilled or leaked waste and accumulated precipitation from the container storage and staging areas in as timely a manner as possible in order to prevent overflow of the collection system [§264.172(b)(5)].

11. The permittee shall not store or place incompatible waste in containers or place material in unwashed containers that previously held an incompatible waste or material [§246.177(b)].

12. Any container holding ignitable or reactive waste must be located at least 15 meters from the facility's property line [§264.176].

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:

Part III. Tank Systems

1. Hazardous waste tank storage shall be conducted only in tanks T-101 to T-110, R-202 and R-203. Agitated mixing of hazardous waste fuels in tanks shall be conducted only in tanks T-111, T-112, and T-114. Blended fuels shall be immediately removed from any of the blending tanks after blending.
2. Pursuant to 48 FR 11157, only hazardous wastes with heating values greater than or equal to 5000 BTU/lb can be added to the fuel blending tanks. For compliance purposes, hazardous waste heating value shall be determined for each container manifested from the generator. Hazardous waste heating value for waste in tanks R-202 and R-203 shall be determined each time a final batch mixture is sent to the fuel blending tanks.
3. This condition applies only to tanks T-111, T-112, T-114 and associated ancillary equipment. Pursuant to §264.196(b), the permittee shall submit to the Department for approval a "Fuel Blending Area Residue Removal Plan" no later than 90 days from issuance of this permit. The plan shall be used to remove release residues which have accumulated for some time on equipment and secondary containment located in the fuel blending area. The plan shall be implemented no later than 30 days from date of approval.
4. This condition applies only to tanks T-111, T-112, T-114 and associated ancillary equipment. Pursuant to §264.194(b), the permittee shall submit to the Department for approval a "Liquid Release Prevention Plan" no later than 90 days from the issuance date of this permit. This plan shall describe equipment features and specific procedures to prevent visible releases from accumulating on any part of the tank systems. The plan shall be implemented no later than 30 days from the date of approval.
5. For purposes of distinguishing RCRA regulated equipment from non-RCRA regulated equipment, all pumps, valves, piping and other equipment ancillary to RCRA tanks shall be either painted or labelled in a manner to visibly identify them as RCRA regulated equipment so inspectors can inspect them accordingly. A plan to implement this specific condition shall be submitted for Department approval no later than 150 days from the issuance date of this permit.
6. The permittee shall inspect all regulated tank systems in accordance with procedures stipulated in Chapter 6 of the permit application. A revised tanks inspection checklist shall be submitted for Department approval no later than 30 days after issuance of this permit to include checks on R-202 and R-203 tanks systems and on other equipment ancillary to T-111, T-112 and T-114.

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:

Part III. Tank Systems (cont'd)

7. The volume of waste handled in each tank and their corresponding maximum liquid levels shall not exceed the following:

<u>Tank No.</u>	<u>Maximum Working Volume</u>	<u>Maximum Liquid Level</u>
T-101 to T-110	6,000 gallons	21 feet from cone bottom.
R-202 to R-203	6,300 gallons	12 feet from tank bottom.
T-111	600 gallons	46 inches (or 1 foot minimum freeboard).
T-112, T-114	780 gallons	65.5 inches (or 2 feet minimum freeboard).

8. Minimum wall shell thickness for the tank walls of T-101 to T-110 shall not be less than 0.25 inches. The minimum wall thickness for the cone bottom portion of these tanks shall not be less than 0.375 inches. The minimum wall thickness for the head portion of these tanks shall not be less than 0.1875 inches. The permittee shall notify the Department if annual wall thickness testing results show any portion of the walls shows a thickness less than the limits stated.

9. Minimum wall thickness values for tanks T-111, T-112, T-114, R-202, and R-203 shall be provided to the Department no later than 90 days after the issuance date of this permit. Annual wall thickness determinations shall also be performed for these tanks. Records of all wall thickness determinations shall be kept for up to 5 years.

10. The permittee is allowed to store in tanks T-101 to T-110 only those hazardous wastes specified in Table 1.1 of the permit application. Blending of hazardous waste into fuels shall be limited to waste codes specified in Table 1.2 of the permit application.

11. The permittee shall report any release to the environment within 24 hours of its detection to the Department (§264.196(d)). The release materials must be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment. (§264.196(b)(2))

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS:

Part III. Tank Systems (cont'd)

12. The permittee shall submit to the Department a report that contains the requirement of §264.196(d)(3) within thirty (30) calendar days of detection of a release to the environment.

13. The permittee shall report any repairs to a tank system to the Department. This report will include the information required by §264.196(e). The tank system shall not be returned to service until the certification and report have been approved by the Department. (§264.196(f))

14. The permittee shall not place waste into tanks that are incompatible with the construction materials of the tank. §264.192(a))

15. The permittee shall not place waste into a unwashed tank which previously held incompatible waste or material. (§264.199(b))

16. The permittee shall ensure that ignitable or reactive waste are to placed into tank unless the requirements of §264.198(a) are met.

Part IV. Closure Conditions

1. The permittee shall manage all hazardous waste, residues, sludges, spilled or leaked waste, or contaminated liquids and soils removed during closure of the units in accordance with the applicable provisions of §260 through §270 and 17-730, including the manifest requirements. A copy of each manifest required as a result of closure activities shall be submitted to the Department with closure certification.

2. The permittee shall close the hazardous waste units in a manner that minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the groundwater, surface waters, or to the atmosphere. (§264.111)

3. The permittee shall submit a written request for a permit modification to authorize a change in the closure plans in accordance with the procedures in 17-730. The written request must include a copy of the amended closure plan for Department approval. (§264.112)

4. The permittee shall notify the Department 30 days prior to the date on which he expects to begin partial closure or final closure of a unit(s). (§264.112)

PERMITTEE:  
Laidlaw Environmental  
Services of Bartow, Inc.

PERMIT/CERTIFICATION NO.: HO53-182726  
PROJECT: Operation of a Hazardous  
Waste Storage and Fuel  
Blending Facility

SPECIFIC CONDITIONS: (cont'd)  
Part IV. Closure Conditions

5. The permittee must complete closure activities within one hundred eighty (180) days after Department approval of the closure plan. Any changes in the time allowed for closure of the units after approval shall require prior Departmental approval. (§264.113)
6. The permittee shall decontaminate or dispose of all facility equipment, structures, and residues resulting from the closure activities as required by §264.114.
7. Within sixty (60) days of the completion of closure, the permittee shall submit to the Department, by certified mail or hand delivery, a letter signed by the permittee and an independent, Professional Engineer registered in the State of Florida, stating that the facility has been closed in compliance with the closure plan. (§264.115)
8. Closure of tank systems, the container storage area or any components thereof, or of any other hazardous waste unit shall be conducted in accordance with plans specified in Chapter 13 of the permit application.

Issued this \_\_\_\_\_ day of \_\_\_\_\_, 1991

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





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RECEIVED  
EPA/REGION IV

REGION IV

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

JUN 19 7 53 AM '91

WASTE  
COMPLIANCE SECTION

JUN 06 1991

4WD-RCRA&FFB

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Steven J. Taylor  
Safety and Compliance Manager  
Tricil Recovery Services, Inc.  
Bartow Municipal Airport  
170 Avenue D North  
Route 3, Box 249  
Bartow, Florida 33830-9504

D. E. R.  
JUN 28 1991  
SOUTHWEST DISTRICT  
TAMPA

RE: Tricil Recovery Services, Inc. (Bartow, Florida)  
EPA I.D. Number 980 729 610  
Phase I - RCRA Organic Emissions Compliance Plan  
Notice of Violation

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the information submitted by Tricil Recovery Services (Tricil) in response to the first Notice of Deficiency (NOD) for the above-referenced document. The information submitted to date and the proposed monitoring plan to verify calculated emission rates are both inadequate. Tricil has thirty (30) days from the date of this letter to submit the information requested in the first NOD and to submit a compliance plan for the installation of control devices to reduce organic emissions.

Tricil's response to the first NOD was inadequate. Tricil originally stated in their response to this NOD that because Tricil's emissions were calculated to be below allowable hourly and yearly limits, the informational requirements did not apply. Tricil's interpretation of 40 CFR 270.24 and 270.25 is incorrect. The information is required regardless of whether emissions are above or below the allowable levels. Furthermore, in the same letter it was stated that due to new information it has been determined that Tricil's emissions are now calculated to be above the allowable limit, yet Tricil still has failed to provide the required information.

The proposed plan to monitor vents for flow and organic emissions in order to verify engineering calculations cannot be used to replace the requirement for a schedule of implementation of control devices. Should a test plan, developed according to 40 CFR 264.1034(c) prove that Tricil's emissions are actually below regulated amounts then the control devices may not need to be installed.

Hereby you are required to submit the information itemized in the enclosed Notice of Deficiency and a control device implementation plan pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927. Compliance with the request for information is mandatory pursuant to 40 CFR 270.24 and 270.25.

Failure to respond fully to this request within thirty (30) days of the date of this letter or to adequately justify such failure to respond, may result in permit denial or result in enforcement action by EPA.

Should you have any questions about the information requested, please contact Ms. Susan Zazzali of the Waste Engineering Section at (404) 347-3433. For questions regarding compliance and enforcement, please contact Mr. Javier Garcia of the Waste Compliance Section at (404) 347-7603.

Sincerely yours,

James H. Scarbrough, P.E., Chief  
RCRA and Federal Facilities Branch  
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee  
Victor SanAgustin, FDER, Tampa



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

4WD-RCRA&FFB

Victor San Augustine  
Hazardous Waste Permitting  
Florida Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

D. E. R.  
JUN 27 1991  
SOUTHWEST DISTRICT  
TAMPA


Dear Mr. San Augustine:

This letter is in regard to your telephone conversation June 19, 1991 with Mr. Kent Williams, of my staff, regarding FY-91 workplan commitments for the permitting of Tricil Recovery (Laidlaw) FLD 980 729 610 in Bartow, Florida. The workplan approved by the Environmental Protection Agency had the Notice of Intent to Issue scheduled for the second quarter of FY-91 with the Final Determination scheduled for the third quarter. On May 2, 1991 Satish Kastury, Environmental Administrator in Tallahassee, revised some state commitments, including Tricil. His revised schedule showed the Notice of Intent to Issue slipping to third quarter and the Final Determination being issued the fourth quarter of FY-91.

Because this is not a new permit, but rather the renewal of an existing storage permit, it is not subject to any federal statutory deadlines. The facility is however, subject to the new air regulations (subparts AA and BB) and consequently EPA would be addressing those requirements under HSWA. We respectfully request that in order to achieve joint permit issuance with the EPA permit, that the Public Notice of your Intent to Issue be delayed until the fourth quarter of FY-91 with the Final Determination being projected for the first quarter of FY-92. If this is agreeable to you, the commitments against which the RCRA year end program review is to be conducted will be adjusted accordingly.

If you have any questions regarding this issue, please contact Ms. Susan Zazzali, of my staff, at (404) 347-3433.

Sincerely yours,

  
James H. Scarbrough, P.E., Chief  
RCRA & Federal Facilities Branch  
Waste Management Division

cc: Satish Kastury - Tallahassee



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION IV

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

4WD-RCRA&amp;FFB

D. E. R.

JUN 24 1991

SOUTHWEST DISTRICT  
TAMPA

Victor San Augustine  
Hazardous Waste Permitting  
Florida Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

Dear Mr. San Augustine:

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If you have any questions regarding this issue, please contact Ms. Susan Zazzali, of my staff, at (404) 347-3433.

Sincerely yours,

*James H. Scarbrough*  
James H. Scarbrough, P.E., Chief  
RCRA & Federal Facilities Branch  
Waste Management Division

cc: Satish Kastury - Tallahassee

## DEPARTMENT OF ENVIRONMENTAL REGULATION

D.E.R.

JUN 21 1991

**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

SOUTHWEST DISTRICT TAMPA

## REMARKS:

Enclosed for your files is a copy of Tricil's permit renewal application.

## 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

6/24/91

PHONE

50552-7612

ext. 390

Victor San Agustin

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D.E.R.

JUN 21 1991

**ROUTING AND  
TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

*James Scarbrough, P.E.*

Initial

Date

2. *Waste Management Section*

Initial

Date

3. *USEPA IV, 345 Courtland Street*

Initial

Date

4. *Atlanta, Ga 30365*

Initial

Date

REMARKS:

*Enclosed for your records is a copy of Laidlaw's permit renewal application.**Susan Zazzali of your staff is providing oversight.*

## 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:

*Victor Sam Agustin*

DATE

PHONE

*(813) 623-5561**ext. 390*

SOUTHWEST DISTRICT TAMPA

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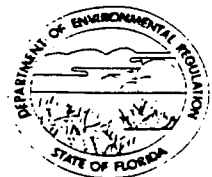
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State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

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

# Interoffice Memorandum

TO: Satish Kastury  
THRU: Clabe Polk *VSA for GRP 6/5*  
FROM: Victor San Agustin, P.E. *VSA 6/4*  
DATE: June 3, 1991  
SUBJECT: Change in RCRA Work Plan Commitment  
Laidlaw Environmental Services of Bartow

-----

This memo is to advise you that the permitting commitments for Laidlaw Environmental Services of Bartow have been changed as per a telephone request from Susan Zazzali of USEPA Region IV back in mid-May, 1991.

Region IV wants us to delay each permitting action by one quarter; i.e., issue the Notice of Intent in the 4th instead of the 3rd quarter and issue the permit renewal in the first quarter of FY'92 instead of the 4th quarter. EPA's first NOD has not yet been completely satisfied. They expect to obtain a complete response by end of the third quarter, so they need to public notice their HSWA permit along with Florida's permit in the 4th quarter. Susan said Kent Williams has no problems with this change.

The Southwest District has no objections to the request. Please update your work plan copies to reflect this change. If you have any questions, please call me at SC552-7612, ext. 390.

VSA/ab

cc: Susan Zazzali, USEPA-IV  
Kent Williams, USEPA-IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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H053-086011  
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FEB 04 1991

4WD-RCRAFFB

Mr. Victor San Agustin, P.E.  
Division of Waste Management  
Florida Department of Environmental  
Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

D.E.R.

FEB 7 1991

SOUTHWEST DISTRICT  
TAMPA

Dear Mr. San Agustin:

This letter is in response to your letter of December 19, 1990, requesting technical assistance on whether or not the fuel blending tanks at Laidlaw Environmental Services (LES) are exempt from applicable Resource Conservation and Recovery Act (RCRA) requirements pursuant to 40 CFR 261.6(c)(1).

The fuel blending tanks at LES are not exempt from RCRA requirements pursuant to 40 CFR §261.6(c)(1) because the fuel blending process used at LES involves the mixing of D001 hazardous waste with solid wastes resulting in a D001 hazardous waste. Therefore, the fuel blending process does not meet the definition of a recycling process and does not meet the exclusion at 40 CFR §261.6(c)(1).

If you have any questions concerning this matter, please contact Daryl Himes of EPA at (404) 347-7603.

Sincerely yours,

John E. Dickinson, P.E., Chief  
Waste Compliance Section  
RCRA & Federal Facilities Branch



pursuant to other RCRA information-gathering authorities.]

#### *B. Regulation of Hazardous Waste Fuel Blending Tanks*

Another feature of the November 29 rules that could be better articulated involves regulation of tanks used to blend hazardous waste fuels. These tanks are found most often at hazardous waste fuel marketers' facilities, where hazardous wastes are blended with oil and other materials to produce hazardous waste fuels. Tanks can also be used to settle out impurities such as bulk solids and water in the course of hazardous waste fuel production.

Several persons have questioned whether these tanks are considered to be exempt recycling units. We believe a fair reading of the rules reflects the Agency's intent that these tanks be regulated, not exempt.

The current rules require marketers and burners to comply with all "applicable" storage standards, and thus do not address specifically the case of hazardous waste fuel blending tanks. See §§ 266.34(c), 266.35(c). The preamble likewise does not speak directly to the issue of fuel blending tanks. The preamble does, however, articulate a strong policy to regulate hazardous waste fuels cradle to grave, to regulate hazardous waste fuel marketers strictly, and to remove certain existing regulatory anomalies that had resulted in gaps in regulatory coverage. Thus, EPA stated that

*all storage of all hazardous waste fuels is subject to regulation. . . . The Agency is today regulating the storage (and transportation) of any hazardous waste used to produce a fuel and of any hazardous waste fuel so produced. . . . As proposed, today's rules subject hazardous waste fuels to storage (and other) controls. This includes storage by the initial marketers (e.g., processors, blenders), storage by subsequent marketers (e.g., distributors), and storage by burners. 50 FR at 49198 (emphasis original).*

In the same discussion, the Agency emphasized that it was eliminating existing regulatory exemptions for non-sludge wastes which are hazardous solely because they exhibit a characteristic of hazardous waste. *Id.* The Agency also eliminated an exemption for blended hazardous waste fuels produced by a person who neither generated nor burned the fuel. *Id.* at 49168/1. The Agency took these steps because the exemptions were without environmental basis, and interfered with the announced goals of controlling hazardous waste fuels cradle to grave. Such exemptions also interfered with another stated Agency goal of strictly controlling hazardous waste fuel

marketers' activities, and making certain that storage of both marketers' incoming hazardous waste and outgoing hazardous waste fuels is fully regulated. *Id.* at 49199.

Given that a chief, articulated purpose of the November 29 rules was to control storage of hazardous wastes used to produce fuels, to further control storage of the hazardous waste fuels once produced, and that the Agency was at pains to remove anomalous exemptions relating to storage from the rules, the Agency believes it clear that storage controls apply to hazardous waste fuel blending tanks. It simply makes no sense to enact a cradle to grave regulatory system but to leave a gap for the blending operation. The Agency notes further that where it wished an activity relating to hazardous waste fuel management to remain exempt, it provided a specific regulatory exemption, as for the act of burning. There is no explicit exemption for blending tank storage. We consequently are clarifying in today's notice that the reference to "applicable" storage standards in the hazardous waste rules subjects hazardous waste fuel blending tanks (along with all other hazardous waste fuel storage devices) to storage regulations.

#### *C. Exemption of Coke and Coal Tar Produced From Coal Tar Decanter Sludge by the Iron and Steel Industry*

It has come to the Agency's attention that certain iron and steel facilities may be combining various hazardous wastes with their coke and coal tar and claiming that the resulting fuel is exempt from regulation. This practice is not intended to result in an exempt fuel except when EPA Hazardous Waste No. K087 is involved. In response to industry comment, EPA exempted from regulation coke and coal tar produced from iron and steel industry coal tar decanter sludge (Hazardous Waste K087) on the grounds that coke and coal tar so produced contain the same concentrations of hazardous constituents as coke and coal tar produced without the hazardous waste sludge. 50 FR at 49170-171. The Agency was absolutely explicit that coke and coal tar produced from Hazardous Waste K087 were the only waste fuels being exempted. *Id.* Likewise, the comments on this issue, from the American Iron and Steel Institute and from Koppers, referred only to coke and coal tar produced from Hazardous Waste K087.

EPA mistakenly codified this exemption as applying to iron and steel industry coke and coal tar produced from *any* iron and steel industry

hazardous waste, rather than just from waste K087. This obviously was neither the Agency's intent, nor commenters', since all discussion on this issue has involved exclusively use of K087 in the coking and coal tar processes. We consequently are correcting the language of the exemption to indicate that it applies only to coke and coal tar produced from coal tar decanter sludge (EPA Hazardous Waste K087).

#### *D. Notification by Burners of Used Oil Meeting the Fuel Specification*

EPA indicated in the preamble to the final regulations that "burners who first claim that used oil fuel meets the specifications" must notify EPA or an authorized state of their used oil fuel management activity. 50 FR at 49195/3. The Agency neglected, however, to include this requirement in the used oil fuel burner regulations (although the parallel notification requirement for marketers who first claim that used oil fuel meets the specification is included in the rules for used oil fuel marketers. See § 266.43(a)(2)).

The Agency also indicated, however, that notification requirements ordinarily do not apply to burners of specification used oil fuel. 50 FR 49195, 49196. This language only apparently conflicts with the preamble language cited above. EPA intended that burners who generate and burn their own specification oil are not required to notify. In contrast, burners who receive off-specification oil from a marketer and blend it themselves must notify, since they are otherwise prohibited from receiving shipments of off-specification used oil from marketers. See § 266.43(b)(5)(A). Accordingly, we are also clarifying in today's rule that burners who generate and burn their own specification used oil fuel—the only burners not affected by the requirement in § 266.43(b)(5)(A)—are not required to notify.

In light of the Agency's clear intent and inadvertent omission, we feel justified in conforming the rule for burners to reflect the preamble statement and parallel regulations. Thus, used oil fuel burners who are the first person to claim that used oil fuel meets the specification—but do not themselves generate such oil—must file a one-time notification of their activities with the Agency. As a practical matter, we expect this requirement to affect only burners engaged in blending activities.

#### *E. Change to § 261.3(c)*

The final rules included a conforming change to § 261.3(c)(2)(ii)(B) referring to materials exempted under

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date January 18, 1991

Subject Tricil Recovery Services, Inc.

Time 9:05 AM

Permit No. AO53-131682

County Polk

Mr. Steven J. Taylor

Telephone No. (813) 533-6111

Representing Tricil Recovery Services, Inc.

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

Other Individuals Involved in Conversation/Meeting None

Summary of Conversation/Meeting \_\_\_\_\_

Mr. Taylor called to notify the DER that an explosion occurred at Tricil this morning.

The explosion occurred in the thin film evaporator at approximately 8:00 AM. Tricil

was refining ethanol at the time. The process stream being refined was about

90% ethanol and was being upgraded to about 96% ethanol. The cause of the explosion

is undetermined at this time, but is being investigated. Tricil reports that

there were no injuries, and that they do not think there were any significant releases  
to the air.

copy to: J. H. Kerns

W. C. Thomas

Viet Ta

C. S. Lee

Victor San Agustin

Steven Taylor

(continue on another  
sheet, if necessary)

Signature *Harry A. Main*

Title DER, Tampa Air Section



December 6, 1990

*revised pages  
inserted into applicati*

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Victor San Agustin

D. E. R.  
DEC 10 1990  
SOUTHWEST DISTRICT  
TAMPA

Re: H053-18276, HW Permit Renewal Application  
First Notice of Deficiency

Dear Mr. San Agustin;

Tricil Recovery Services, Inc., submits the following in response to the referenced Notice of Deficiency:

A. i) The Bartow Facility will not be subject to the requirements of 40 CFR 264, Subpart AA, since process vent emissions fall below the threshold of 3.1 tons/year and 3 lb/hr, as calculated according to EPA document "Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources", fourth edition.

A. ii) Compliance with 40 CFR 264, Subpart BB, is not required until December 21, 1990, and the facility has not yet completed the evaluation of the best means for meeting the requirements. Prior to the effective date of the regulations, the facility will submit documentation of compliance.

B. A crude storage tanks high level alarm test method is now operational. Manhole covers for the tanks are at the facility, but need an adapter to fit the tanks correctly. Delivery of the adapters and installation of the new covers is expected to be completed by December 17, 1990.

C. The units in question are part of the recycling/reclamation processing equipment and as such are not subject to this storage permit. However, a fuels blending process flow diagram which shows the equipment is enclosed.

D. A revised Chapter 4, Waste Analysis Plan, is enclosed.

E. A revised Chapter 11 is enclosed, including Table 11.1.

F. Figure 11.1 has been revised in Chapter 11.

G. It is our position that the units in question do not require a RCRA permit, since they are processing or blending units and not storage units, in accordance with 40 CFR 261.6(c)(1) and 266.34(c) [FAC 17-730.030 and 17-730.181]. As required by these Rules, we have already sought and obtained and now seek a renewal of the existing RCRA permit, for the units that store hazardous waste fuels.

"Storage" is defined in the Florida Hazardous Waste Rules [FAC 17-730.020] as: "the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere". This definition is consistent with the ordinary meaning of the word "storage", meaning "to accumulate or put away for future use." Random House Dictionary of the English Language 1877 (2d ed. unabridged 1987). In other words, "storage" involves the passive containment of hazardous waste fuel over some temporary period of time.

In contrast, the regulations refer to "treatment" as: "any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological composition of any hazardous waste so as to neutralize such waste, or so as to recover such energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage or reduced in volume." This definition of "treatment" as an activity that makes hazardous wastes "amenable for storage" demonstrates that the act of treatment is completely distinct from the act of storage. 40 CFR 261.6(c)(1) [FAC 17-730.030] states that recyclable materials are subject to 40 CFR 266.34 [FAC 17-730.181] and only storage is subject to RCRA permitting under this Rule.

The facility utilizes entirely separate areas for fuel blending and fuel storage. Unlike the passive fuel containment that occurs in the RCRA permitted storage area, the blending area is the site of an active process in which fuel components are physically mixed together and undergo changes in their chemical character and composition. The process is ongoing, and the blended fuel product which results is subsequently moved out of the blending area and into the RCRA permitted storage area.

As set forth above, we believe that the units in question are not regulated, as they perform a recycling activity which is exempt from RCRA permitting under 40 CFR 261.6(c)(1). At this time, we are willing to provide the requested information in order to propose a practical solution to the Department's concerns and tentatively plan to amend our renewal application (RCRA permit application) to include these units with those seeking a RCRA permit renewal.

H. Appendix E has been revised to include TCLP, revised section enclosed.

I. Construction to extend containment to 18.9 feet was anticipated to be done in conjunction with the installation of new storage tanks under the construction permit application HC53-170970, and was expected to be completed by this time. Upon issuance of the construction permit, this item will receive first priority.

We trust that the enclosed information, plus that to be submitted soon hereafter, will satisfy the areas of concern expressed in the N.O.D. If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Sanderock".

Michael Sanderock  
Facility Manager

Enclosures  
ST/drs

cc: Steve Taylor  
Ashley Chadwick

0678A



## *Florida Department of Environmental Regulation*

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Dr. Richard Garrity, Deputy Assistant Secretary

December 19, 1990

Mr. James Scarbrough, P.E.  
Waste Management Division  
USEPA Region IV  
345 Courtland Street, NE  
Atlanta, GA 30365

Re: Hazardous Waste Fuel Blending Program at  
Laidlaw Environmental Services of Bartow (LEIS), Florida

Dear Mr. Scarbrough:

As discussed with Satish Kastury and Hugh Hazen during Florida's semi-annual RCRA workshop, the purpose of this letter is to request USEPA's concurrence regarding regulating LESB's fuel blending tanks and ancillary equipment as RCRA tanks systems as defined in 40 CFR 260.10.

This investigation is being conducted in conjunction with LESB's permit renewal application. The final RCRA Work Plan commitments requires the Department to perform a completeness determination by end of the second fiscal quarter. This implies we should deem LESB's submittal complete by the end of March. This also implies we should have a complete submittal from LESB by end of January. LESB's first NOD response (enclosed) however, reflects their position that the fuel blending units are exempt from RCRA Subtitle C requirements pursuant to §261.6(c)(1). We received the response on December 10, 1990.

As a result of this and because of time constraints imposed by the Work Plan, the Department is inclined to proceed with processing a permit denial unless LESB agrees that these are RCRA tank systems and that LESB provides by mid-January information required by Part II.C. of FDER's hazardous waste facility permit application form.

A copy of their RCRA fuels blending process flow diagram is also enclosed to assist your staff's review. Please note that other types of equipment are used and come in contact with the waste. We also seek your assistance in determining which pieces qualify as ancillary equipment as defined in §260.10.



You will also note that there are other pieces of equipment which may not qualify as tanks or ancillary equipment as defined in §260.10. These include 4 basket filters, a drum scraping machine, a shredder, and 2 grinders, all of which come in contact with the waste and are part of the RCRA fuels blending program. If not regulated as part of the RCRA tank system, the Department believes they should be regulated as miscellaneous units. Your concurrence on this issue is also requested because LESB has taken the position these are exempted from RCRA because they are part of the recycling equipment. We intend to require that information required by Part II, Section I of our permit application be provided by mid-January should EPA concur.

The Department disagrees with LESB's position that the fuel blending area is "a recycling activity which is exempt from RCRA permitting under §261.6(c)(1)". FDER staff believe that as far as hazardous waste fuels are concerned, the recycling activity occurs during combustion of these fuels in a boiler or furnace where energy from the waste is recovered. Typically, these furnaces have storage tanks on site which are regulated under RCRA. LESB receives high BTU waste from generators, blends some of them into fuels, and then stores the blended fuel in RCRA regulated tanks before they are trucked to the furnace customer. Department staff believe LESB merely renders these wastes amenable for recycling. We believe the RCRA fuels blending operations should not be considered a recycling activity.

Because of time constraints imposed by the RCRA work plan, we request an expeditious response. If LESB is to provide a complete submittal by end of January, we would appreciate receiving a written response on this matter in early January, say by January 14, 1991.

If I can be of any assistance in expediting EPA's determination, please call me at (813) 623-5561, ext. 390.

Sincerely,



Victor San Agustin, P.E.  
Professional Engineer II  
Division of Waste Management

VSA/ab  
Enclosures

cc: Satish Kastury, BWP&R  
Ron Dobbs, USEPA IV

Department of Environmental Regulation

## Routing and Transmittal Slip

To: (Name, Office, Location)

1. JAMES SCARBROUGH
2. U.S.E.P.A. IV
3. # 345 COUTLAND ST, NE
4. ATLANTA,GA # 30365

Remarks:

RE: Permit Renewal Application for  
Tricil recovery Services

Here's two copies of Tricil's response  
to our first Notice of Deficiency.

Any questions, please call at (813)  
623-5561, ext.390.

From

Vicxto San Agustin

Date

12/19/90

Phone



Department of Environmental Regulation

## Routing and Transmittal Slip

To: (Name, Office, Location)

1.	SATISH KASTURY, BWP&R
2.	
3.	
4.	RE: HO53-182762

Remarks:

HERE"s two copies of Tricil Recovry's response to our first NOD.

I sent two copies to Jim Scarbrough unde separate cover.

Any questions, please call at SC 552X-7612, ext.390.

From	Date 12/19/90
VICTOR SAN AGUSTIN	Phone _____



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

December 3, 1990

Mike Sanderock, Facility Manager  
Laidlaw Environmental Services  
of Bartow, Inc.  
170 Bartow Municipal Airport  
Bartow, Florida 33830-9504

Re: HC53-182726, Pending Response to First Notice of Deficiency

Dear Mr. Sanderock:

Please be advised, it has been over 110 days since the August 13, 1990 Notice of Deficiency was issued by the Department. The purpose of this letter is to establish a December 17, 1990 deadline by which the Department must receive a complete response.

Federal commitments require the Department to determine whether your renewal application is eligible for renewal or denial by March, 1991. We need a considerable amount of time to review your response because, as indicated in the NOD, the Department is requesting a new application and EPA intends to check for proof of compliance with RCRA Subparts AA and BB regulations. Your cooperation in this regard is requested.

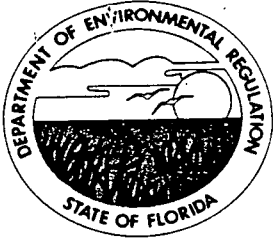
If you have any questions, please call me at (813) 623-5561, ext. 390.

Sincerely,

Victor San Agustin, P.E.  
Professional Engineer II  
Division of Waste Management

VSA/ab

cc: James Scarbrough, USEPA IV  
Satish Kastury, BWP&R  
Susan Zazzali, USEPA IV



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary  
Dr. Richard Garrity, Deputy Assistant Secretary

August 13, 1990

Mr. Mike Sanderock  
Facility Manager  
Tricil Recovery Services  
Route 3, Box 249  
Bartow, Florida 33830-9504

RECEIVED  
AUG 16 1990  
FBI

Re: HO53-182726, HW Permit Renewal Application  
First Notice of Deficiency

Dear Mr. Sanderock:

The Department acknowledges receipt of a June 22, 1990 letter from Mr. Steve Taylor. It requests that Tricil's existing permit HO53-86011A be renewed. The letter was accompanied by a \$2,000 check and a completed page 27 of 27 of FDER's Application for a Hazardous Waste Facility Permit Application.

Review of the renewal application shows that it is incomplete. Pursuant to Section 17-730, FAC, we request you address the following deficiencies and respond as requested by the latter part of this letter.

- a. New RCRA regulations have been developed since your permit HO53-86011A was issued in May, 1989. Pursuant to Section 3004(c) of RCRA, the Department must have reasonable assurance that your facility will be complying with new RCRA requirements. Some of these requirements include:
  - i) 40 CFR 264, Subpart AA - Air Emission Standards for Process Vents
  - ii) 40 CFR 264, Subpart BB - Air Emission Standards for Equipment Leaks
- b. A RCRA compliance evaluation inspection conducted on May 29, 1990 revealed some violations of RCRA and permit requirements. Enclosed is a copy of the warning notice which lists the violations. Pursuant to Section 17-730.200(2) and Section 17-4.07(4), FAC, your permit application may be denied if the violations are not corrected in a timely manner. We request you submit a response listing all corrective actions and indicate the dates by which each corrective action would be completed.

- c. The June 22 letter mentions that a solids grinder, a drum coring machine, and an additional sludge mix tank have been installed since the issuance of the H053-86011A. The original operating permit application should be updated to reflect all hazardous waste units. For example, the fuels blending process flow diagram should include these additional units. In addition, Section I of Hazardous Waste Permit Application form 17-730.900(2), F.A.C. requests for detailed information regarding these pieces of equipment. Information required by Section I of the form should be provided.
- d. Chapter 4, Waste Analysis Plan should be revised to comply with all applicable requirements of the TCLP rule and 40 CFR 268.7 requirements for fuel blending as related to land ban. For example, TRSI's Generator's Waste Material Profile sheet should perhaps include the 25 new organic constituents regulated under the TCLP rule. Furthermore, Section 4.4 of the Waste Analysis Plan should perhaps include additional test parameters.
- e. Table 11.1 in Chapter 11 should include the newly regulated TCLP constituents into the various waste compatibility groups.
- f. Figure 11.1 of the original application no longer appears to reflect present operations. This drawing indicates the northwest side of the building is used typically for storing empty drums, pallets, and non-hazardous waste. Previous inspections have shown that this area has been stored with hazardous waste. Furthermore, the northeast side of the building shows one bottoms mixer and one drum opener. Previous inspections have shown other blending/processing equipment. This figure should be updated.
- g. Review of permit H053-86011A, shows that the mixer tanks located in the blending area are not part of the RCRA permit. Please explain for purposes of this renewal, why they should not become part of the renewed RCRA permit as RCRA tanks.
- h. Appendix E of the original permit application references the EP Toxicity test as the test used to determine one of the characteristics of a hazardous waste. Given the promulgation of the new TCLP rule, you should replace this section with the TCLP procedures.

Mr. Mike Sanderock  
Tricil Recovery Services

August 13, 1990  
Page Three

- i. Section 12.3 of the original application states that secondary containment for the tank farm will be designed and installed to surround the tank completely and will cover all surrounding earth. It further states this will be accomplished by constructing a concrete surface over the ground that extends no less than 18.9 feet past the walls of the tanks in the tank farm. Previous inspections have shown that grassy areas exist within less than 18.9 feet from the tank walls. The affected grassy areas should therefore be covered with concrete.

The permit renewal instructions in DER's application for a hazardous waste facility permit application form states that if there have been any changes to the facility plan, its operation, or regulatory changes that affect its generation, then a new application must be submitted. The Department feels the above mentioned changes are significant enough to warrant a new application; as such, we are requesting that one be submitted. As suggested in the application, we encourage you to arrange a preapplication meeting with us to discuss the extent of the needed changes.

If you have any questions, please call me at (813) 623-5561, ext. 390.

Sincerely,



Victor San Agustin, P.E.  
Professional Engineer II  
Division of Waste Management

VSA/ab

cc James Scarbrough, USEPA IV  
Satish Kastury, BWP&R



D. E. R.

June 22, 1990

JUN 26 1990

SOUTHWEST DISTRICT  
TAMPA

Richard D. Garrity, Ph.D.  
Deputy Assistant Secretary  
Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, FL 33610-7347


Re: Hazardous Waste Storage Operating Permit, Tricil Recovery Services, Inc.

Dear Dr. Garrity;

Tricil Recovery Services, Inc., requests that permit # H053-86011A, to operate a hazardous waste storage facility, be renewed. No changes in facility construction or operation have been made which would affect the permitted operations. A solids grinder, a drum-coring machine, and an additional sludge mix tank have been installed for the fuel blending process, but are not being used until air emissions permits are revised accordingly. This equipment, and other proposed facility modifications, will be fully addressed in the new Part B permit application currently under review by the Department.

Enclosed are three copies of the certification page, two additional copies of this letter, and payment of the renewal fee of \$2,000.00.

Sincerely,

  
Steve Taylor  
Safety and Compliance Manager

ST/mj

Enclosures

JUN 26 1990

DER Form 17-730 800(2)
Form Title: App. for a Hazardous Waste Facility Permit
Effective Date: _____
DER Application No. _____ (Filed in DEB)

# SOUTHWEST DISTRICT TAMPA Application for a Hazardous Waste Facility Permit Certification

To be completed by all applicants

## 1. Operator

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

Mike Sanderock

Signature of the Operator or Authorized Representative

\*Attach a letter of authorization

MIKE SANDEROCK, FAC. MGR.

Name and Title (Please Type or Print)

Date: 6/22/90 Telephone No. (813) 533-6111

## 2. Facility Owner

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

Mike Sanderock

Signature of the Facility Owner or Authorized Representative

\*Attach a letter of authorization

MIKE SANDEROCK, FAC. MGR.

Name and Title (Please Type or Print)

Date: 6/22/90 Telephone No. (813) 533-6111

## 3. Land Owner

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

Ben Durrance

Signature of the Facility Owner or Authorized Representative

\*Attach a letter of authorization

Ben Durrance, Executive Director

Name and Title (Please Type or Print)

Date: 6/22/90 Telephone No. (813) 533-1195

## 4. Professional Engineer Registered in Florida (Where Required by Chapter 471, F.S.)

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

Robert O. Covington

Signature

Florida Registration No. 18041

(Please Affix Seal)

Robert O. Covington, P.E.

Name (Please Type)

Mailing address: 250-A Bartow Municipal Airport

Street or P.O. Box

Bartow

City

Florida

State

33830

Zip

(813) 533-6282

Telephone No.

6/22/90

Date

VIA CERTIFIED MAIL

D. E. R.

July 2, 1991

JUL - 3 1991

SOUTHWEST DISTRICT  
TAMPA

James H. Scarbrough, Chief  
RCRA and Federal Facilities Branch  
Waste Management Division  
United States Environmental Protection Agency  
Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Re: Tricil Recovery Services, Inc. (Bartow, Florida) FLD980729610  
Phase I - RCRA Organic Emissions Compliance Plan,  
Notice of Violation

Dear Mr. Scarbrough;

Laidlaw Environmental Services of Bartow, Inc. (formerly Tricil Recovery Services, Inc.), submits the following responses to items in the NOV referenced above.

Since calculated process emissions are estimated to be greater than 3.1 tons/year, based on annual throughput, a schedule for the implementation of emissions control systems is attached. This schedule shows the types of control devices deemed appropriate at this time, and dates by which necessary control devices will be installed and in operation.

Item 1: For each affected unit the following must be provided:

- a. Operating hours
- b. Annual throughput
- c. Maximum hourly emissions
- d. Waste stream analysis with exact organic concentration.

Response:

a and c. Operating hours and calculated maximum hourly emissions for affected equipment since the effective date of the rule (12/21/90) are:



<u>Unit</u>	<u>Operating Hours</u>	<u>Maximum lb/hr</u>
Vacuum still	755	6.7
Thin Film Evaporator	544	18.1
Fractionation Column	1790	14.7

b. Revised Form AA-1, submitted with the February 22, 1991, response, shows annual throughput (attached).

d. As stated in the February 22, 1991, response, waste streams are extremely variable, since we are a processor of other companies' wastes, and not a generator. The organic concentration is useful only in determining if this section is applicable, and we have indicated that all waste streams are greater than 10% organic and therefore subject to regulation. Waste streams are highly variable in organic content and providing any specific figure would serve no useful purpose.

Item 2: Information and data supporting estimates of vent emissions must be provided. For the purpose of determining compliance, estimates of vent emissions must be made using operating parameter values (e.g., temperatures, flow rates, or concentrations) that represent the conditions when the waste management unit is operating at the highest load or capacity level reasonably expected to occur.

Response:

Since there are no emissions monitoring or control devices installed at this facility, emissions estimates are calculated according to methods defined in EPA publication "Compliance of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources", Fourth Edition (1985), 4.7 Waste Solvent Reclamation. This method states an emission factor average of 3.30 pounds of volatile organic emissions per ton of material processed. The hourly rate for a given material is calculated as:

$$3.30 \text{ lb/ton} \times \text{Gallons Processed} \times \text{Specific Gravity (vs. Water)} \times$$

$$8.33 \text{ lb/gallon (water)} \div 2000 \text{ lb/ton} \div \# \text{ Hours Processed}$$

For purposes of estimating emissions for compliance, it is assumed that all materials are 100% pure, even though sludge and water concentrations often exceed 50% in reclaimable material.

The maximum capacity level reasonably expected to occur would be reflected in the maximum lb/hr figures shown in the Response to Item 1, above.

Item 3: A statement signed and dated by the owner or operator certifying that the operating parameters used in the analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur.

Response:

As previously stated in the February 22, 1991, response, 40 CFR270.24(d) refers to compliance with 40 CFR270.1033, control devices and closed-vent systems. Since this facility has no control devices or closed-vent systems, this section does not apply.

Item 4: For each piece of equipment identify the hazardous waste management unit it is associated with.

Response:

Form BB-1 (attached) identifies the hazardous waste management unit each piece of equipment is associated with. Since all distillation and storage units are interconnected, designating any particular piece of equipment to any other would be arbitrary and would defeat the purpose of the rule. By designating the distillation area as a single unit, the over 700 affected pieces of associated equipment are easier to locate and maintain.

Item 5: For each affected piece of equipment the following must be provided:

- a. the percent total organics in waste stream
- b. the physical state of waste.

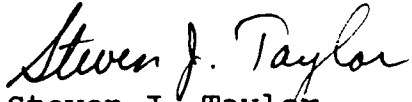
Response:

a. As previously stated in the February 22, 1991, response, waste streams are extremely variable, since we are a processor of other companies' wastes, and not a generator. The organic concentration is useful only in determining if this section is applicable, and we have indicated that all waste streams are greater than 10% organic and therefore subject to regulation. Waste streams are highly variable in organic content and providing any specific figure would serve no useful purpose.

b. Form BB-1 lists the physical state of the waste at each piece of equipment. This section is correct as originally submitted.

If you have any further questions or comments about this matter, 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

ST/drs

cc: Paul Manak, LES, Bartow  
Ashley Chadwick, LES, Antioch  
John Deal, LES, Columbia  
Satish Kastury, FDER, Tallahassee  
Victor San Agustin, FDER, Southwest District

0937A

Process Vents Emission Controls Implementation Schedule  
June 28, 1991

Laidlaw Environmental Services of Bartow, Inc. (formerly Tricil Recovery Services, Inc.), proposes to design, install, and operate emissions control systems for distillation process vents as determined to be necessary to either reduce facility distillation process emissions to below 3.1 tons/year and 3 pounds/hour or to reduce those emissions by 95%, according to the schedule below. Emissions are currently calculated based solely on throughput; materials processed are assumed to be 100% purity, rather than actual 40% to 80%; the normal 20% to 60% sludges and water are not accounted for; and EPA publication AP-42 does not account for vent size or any other operating characteristics. For these reasons, calculated values are not suitable for use as design parameters. Therefore, testing and monitoring of actual process operations must be conducted in order to properly design and operate any emissions control system. Based on the information currently available, the facility has determined that a thermal oxidation control device would be the best system for this application. The following schedule shows the expected completion dates for all phases of the project:

Order monitoring equipment:	July 15, 1991
Delivery of monitoring equipment:	September 1, 1991
Completion of monitoring and equipment design:	October 31, 1991
* Order control equipment:	November 15, 1991
(six months estimated delivery time)	
* Receive control equipment:	May 1, 1992
* Install control equipment:	June 21, 1992

\* If monitoring results show that process vent emissions are below 3.1 tons/year and 3 pounds/hour, then a decision will be made whether or not to proceed with the installation of control devices.

ST/drs  
1411A

**FORM AA - 1**  
**40 CFR 265/265 - SUBPART AA AFFECTED UNITS LIST**  
**(To Be Maintained In The Operating Record)**

HAZARDOUS WASTE ①	PROCESS	TOTAL ORGANIC CONCENTRATION-WASTE	SUPPORTING CALCULATIONS/DOCUMENTATION [Include waste test results or knowledge of waste]		SUBPART AA ② APPLICABLE	
					Yes	No
Organic Solvents	Vacuum Still	> 10%	<u>1988 Throughput</u> 550 gallons	<u>1988 Calculated Emissions</u> 0.00 tons		X
			<u>1989 Throughput</u> 15,015 gallons	<u>1989 Calculated Emissions</u> 0.12 tons		X
			<u>1990 Throughput</u> 9,500 gallons	<u>1990 Calculated Emissions</u> 0.11 tons		X
Organic Solvents	Thin Film Evaporation	> 10%	<u>1988 Throughput</u> 11,880 gallons	<u>1988 Calculated Emissions</u> 0.12 tons		X
			<u>1989 Throughput</u> 136,441 gallons	<u>1989 Calculated Emissions</u> 1.64 tons		X
			<u>1990 Throughput</u> 313,219 gallons	<u>1990 Calculated Emissions</u> 3.69 tons	X	

1 - A Facility Site Plan with the approximate location of each unit is attached.

2 - If any units are determined to be affected by Subpart AA, complete Form AA - 2.

HAZARDOUS WASTE ①	PROCESS	TOTAL ORGANIC CONCENTRATION-WASTE	SUPPORTING CALCULATIONS/DOCUMENTATION [Include waste test results or knowledge of waste]			SUBPART AA ② APPLICABLE	
						Yes	No
Organic Solvents	Distillation	> 10%					
			<u>1988 Throughput</u> 5,120 gallons	<u>1988 Calculated Emissions</u> 0.05 tons		X	
			<u>1989 Throughput</u> 123,903 gallons	<u>1989 Calculated Emissions</u> 1.47 tons		X	
			<u>1990 Throughput</u> 254,700 gallons	<u>1990 Calculated Emissions</u> 3.00 tons		X	
			Total Facility Emissions (tons, calculated)				
			<u>1988</u> 0.17	<u>1989</u> 3.22	<u>1990</u> 6.79		
Calculated emissions are based on total throughput per EPA publication "Compliance of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources", Fourth Edition.							

- 1 - A Facility Site Plan with the approximate location of each unit is attached.  
2 - If any units are determined to be affected by Subpart AA, complete Form AA - 2.

List Prepared By: Steven J. Taylor Date: February 22, 1991  
Environmental Manager's: Steven J. Taylor Date: February 22, 1991  
Signature (if appropriate)  
Facility Manager's: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature

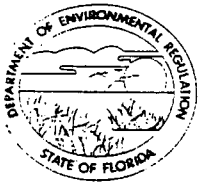
NOTE: This form should be completed at least annually or when wastes being managed in a unit are determined to have changed.

**FORM BB - 1**  
**40 CFR 264/265 - SUBPART BB AFFECTED EQUIPMENT LIST**  
**(To Be Maintained In The Operating Record)**

HAZARDOUS WASTE UNIT ①	ASSOCIATED EQUIPMENT TYPE	ASSIGNED IDENTIFICATION #	PERCENT BY WEIGHT; TOTAL ORGANICS ②	SUBPART BB APPLICABLE		PHYSICAL STATE	METHOD OF COMPLIANCE
				Yes	No		
PUMPS IN LIGHT LIQUID SERVICE							
B	Pump	71	>10	X		Liquid	Monthly monitoring
E	"	188	"	X		"	"
E	"	192	"	X		"	"
D	"	438	"	X		"	"
D	"	439	"	X		"	"
D	"	463	"	X		"	"
D	"	456	"	X		"	"
D	"	466	"	X		"	"
D	"	443	"	X		"	"
D	"	441	"	X		"	"
D	"	448	"	X		"	"
D	"	421	"	X		"	"
E	"	501	"	X		"	"
E	"	539	"	X		"	"
E	"	540	"	X		"	"
E	"	546	"	X		"	"
E	"	552	"	X		"	"
E	"	553	"	X		"	"
E	"	554	"	X		"	"
E	"	559	"	X		"	"

① - A Facility Site Plan with the approximate locations of each unit is attached.

② - Supporting documentation should be attached.



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: Victor San Agustin  
Bill Crawford

FROM: Lynne R. Milanian *Lynne 7/2*  
DATE: July 2, 1991

SUBJECT: Name Change from Tricil Recovery Services, Inc.,  
to Laidlaw Environmental Services of Bartow, Inc.  
for permits HO53-182726 and HO53-086011A  
FLD 980 729 610

-----  
Attached please find documents submitted May 29, 1991 by the referenced facility which are supplement to the subject permit.

This package includes information detailing:

1. Requests for transfer of permit for File Numbers  
HO53-182726 and HO53-086011A

LRM/ab  
Attachment

cc: James Scarbrough, EPA Region IV



D. E. R.

MAY 29 1991

SOUTHWEST DISTRICT  
TAMPA



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION FOR TRANSFER OF PERMIT

H053-197606

Permit No. H053-18276 18276 Date Issued \_\_\_\_\_ Date Expires \_\_\_\_\_

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: \_\_\_\_\_ County: \_\_\_\_\_

Source Location: \_\_\_\_\_ City: \_\_\_\_\_

Permittee Name: \_\_\_\_\_ Title: \_\_\_\_\_

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

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

Sworn to and subscribed before me at \_\_\_\_\_

Signature of Permittee

County, \_\_\_\_\_

this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

Title

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

Notary Public

My Commission Expires: \_\_\_\_\_

REQUEST FOR TRANSFER OF PERMIT

Source Name: Tricil Recovery Services, Inc.

Applicant Name: Laidlaw Environmental Services of Bartow, Inc. Title: \_\_\_\_\_

Mailing Address: 170 Bartow Municipal Airport, Bartow, Florida 33830-9504

Telephone: (813 ) 533-6111  
area

Project Engineer: Name: N/A

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

Telephone: ( )  
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. H053-18276 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Polk

County Bartow, Florida

this May day of 1991

L. Hamilton

Notary Public

My Commission Expires: \_\_\_\_\_

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. MAR. 19, 1994  
BONDED THRU GENERAL INS. UND

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

Paul W. Manak

Signature of Applicant\*

Facility Manager

Title

Date: 5/28/91

D.E.R.

MAY 29 1991

SOUTHWEST DISTRICT  
TAMPA



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION FOR TRANSFER OF PERMIT

H053-197628

Permit No. H053-086011A Date Issued 5/15/89 Date Expires 11/6/90

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: \_\_\_\_\_ County: \_\_\_\_\_

Source Location: \_\_\_\_\_ City: \_\_\_\_\_

Permittee Name: \_\_\_\_\_ Title: \_\_\_\_\_

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

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

Sworn to and subscribed before me at \_\_\_\_\_

Signature of Permittee

County, \_\_\_\_\_

this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

Title

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

Notary Public

My Commission Expires: \_\_\_\_\_

REQUEST FOR TRANSFER OF PERMIT

Source Name: Tricil Recovery Services, Inc.

Applicant Name: Laidlaw Environmental Services of Bartow, Inc. Title: \_\_\_\_\_

Mailing Address: 170 Bartow Municipal Airport, Bartow, Florida 33830-9504

Telephone: (813) 533-6111  
area

Project Engineer: Name: N/A

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

Telephone: ( )  
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has ex-

amined the application and documents submitted by the current permittee the basis on which Permit No. H053-086011A was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Polk

County, Bartow, Florida

this 19 day of May 19 91

Notary Public

My Commission Expires: \_\_\_\_\_

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. MAR. 19, 1994  
BONDED THRU GENERAL INS. UND.

Paul W. Manak  
Signature of Applicant

Facility Manager

Title

Date: 5/28/91

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



D.E.R.

JAN 18 1991  
SOUTHWEST DISTRICT  
TAMPA

January 17, 1991

Florida Department of Environmental Regulation  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Attention: Victor San Agustin

Re: H053-18276, HW Permit Renewal Application  
First Notice of Deficiency

Dear Mr. San Agustin;

Enclosed please find the remaining outstanding information requested in the referenced NOD:

1. Chapters 18 and 19, demonstrating compliance with 40 CFR 264, Subparts AA and BB, for inclusion into the permit.
2. Emergency vent manhole covers have been installed on all ten crude product storage tanks in accordance with specifications in the existing permit application.
3. Tricil Recovery Services maintains that the fuel blending process equipment is not subject to RCRA permitting requirements, and it would therefore be inappropriate to amend the application form to include these units. We are including calculations showing that these units are adequately contained within the fuel blending process area, and a modified daily tanks inspection form to include them. All tank construction specifications available to us are already in the permit on pages 386 and 387 of Appendix M.

This should complete the request for information in the NOD. If you have any questions, please contact me.

Sincerely,

Michael Sanderock  
Facility Manager

*Chapters added to the Application*

cc: Steve Taylor  
Ashley Chadwick

Enclosures  
MS/drs  
0820A

FF-02/86

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

[illegible]