

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Satish Kastury

THRU: Gary Santti *GS*

FROM: Bill Crawford *WC*

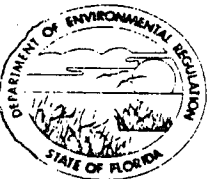
DATE: May 27, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610
Construction Permit Application HC53-170970
Copy of Application

MISSING
F-C

This memo is to inform you that two complete copies of the referenced application are being forwarded to EPA Region IV under this cover.

c.c. w/attachments (two copies)
Alan Farmer EPA/REGION IV



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

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

Interoffice Memorandum

PERMIT COVER MEMO

TO: X RICK GARRITY, DDM
_____ WILLIAM KUTASH, ENV. ADM. *WA 1/10/92*
_____ OGC, ATTN: _____

A. 3-c

FROM/THROUGH:

William Kutash, ENVIRONMENTAL ADMINISTRATOR
_____, PROGRAM SUPERVISOR
William C. Crawford *WC*, SECTION SUPERVISOR
_____, ENG, ENV SPEC, GEOLOGIST

DATE: January, 10, 1992

FILE NAME: Laidlaw Env Svcs of Bartow PERMIT #: HC53-170970
PROGRAM: Hazardous Waste COUNTY: Polk

TYPE OF PERMIT ACTION: X ISSUE _____ DENY _____ MODIFY _____
_____ TRANSFER OWNER _____ NOD _____ INTENT _____ PUBLIC NOTICE

PUBLIC NOTICE PERIOD CLOSED? December 2, 1991

PETITION? No RELEASED BY OGC? Yes

PERMIT SUMMARY: See attached memo.

PROFESSIONAL RECOMMENDATION: X APPROVE _____ DENY

EVALUATION SUMMARY: See Attached memo.

DAY 135/30 FOR THIS ACTION IS January 26, 1992

Issued permit is contained in AT, 3-E



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Bill Crawford</u>	Location: <u>Tampa</u>
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

A, 3 - C

D. E. R.

DEC 23 1991

SOUTHWEST DISTRICT
TAMPA

TO: Bill Crawford, Engineer IV
DER/Tampa

THROUGH: Doug Outlaw *DO*
Professional Engineer II
Hazardous Waste Regulation

FROM: John E. Griffin *JEG*
Engineer III
Hazardous Waste Regulation

DATE: December 17, 1991

SUBJECT: Review of Laidlaw Environmental Services of Bartow;
FLD 980 729 610; Draft Permit HC53-170970.

I have reviewed the subject document and have the following comments:

1. The hazardous waste codes need to be divided so that a person would know which waste codes are included in the Permit without having to look (i.e., Sparkle Draft Permit).
2. Need to put the Issued Date and Expiration Date on this permit before it is final.
3. We need the General Specific Conditions 1-7a and b.
4. Specific Conditions Part III Containers number 15 needs to have section 246 changed to section 264.
5. Specific Conditions Part IV, Tank Systems number 5 needs t-151 changed to T-151.
6. Specific Conditions Part IV, Tank Systems number 6 needs to be rewritten so that the 5000 BTU/lb waste is not going into tanks R-202 and R-203.
7. Specific Condition Part IV, Tank Systems number 10 - The minimum wall thickness values is to be determined by the Department, not by the facility.
8. Specific Condition Part IV, Tank Systems number 13, line 3, the word "release" needs to be "released."
9. Specific Conditions Part V, Closure Conditions number 5 - We are approving the closure plan so this condition needs to say that they would close within 180 days of a closure permit.

Memo to Bill Crawford
December 19, 1991
Page Two

10. Specific Conditions Part V, Closure Conditions number 6 -
"all facility equipment" needs to read "all unit(s)
equipment."

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

JEG/rz

H053-170970

AT, 3-F

D.E.R.

VIA FEDERAL EXPRESS

November 14, 1991

NOV 15 1991

SOUTHWEST DISTRICT
TAMPA

U. S. Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
Attention: Ms. Susan Zazzali

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

Dear Ms. Zazzali;

As proposed in our July 2, 1991, response to the Notice of Violation, we are conducting monitoring of process vents to determine the accuracy of AP-42 calculations of vent emissions. Unfortunately, due to unforeseen delays in the delivery of monitoring instruments and the installation of suitable sampling ports, as well as subsequent equipment failures due to the nature of the materials being monitored, we have not completed to our satisfaction studies on all process vents at this time. Also, operation of distillation equipment is dependent upon acquiring enough material to make a batch, so the thin film evaporator and vacuum still have been used only infrequently. However, preliminary data acquired from the fractionation column vent appear to validate our original contention that process vent emissions are not of a magnitude which would exceed threshold limits of 3.1 tons/year and 3 pounds/hour, which would require the installation of control devices.

The initial test, on 10/24/91, showed a near-constant outflow from the vent of 0.01 cubic meters/minute, at a mean concentration of organic compounds of 22,500 ppm. This run was of 1,1,1-trichloroethane material, and monitoring was conducted during the middle of the process and during shutdown. After shutdown, VOC levels rapidly dropped to near 0. Measured VOCs show emissions of 1.47 lb for the run of 20 hours. Corresponding AP-42 calculations would predict emissions of 67.11 lb based on a throughput of 3,727 gallons of raw material.

Since the VOC sensor was destroyed by condensed chlorinated compounds on the first run, only flow was monitored on 11/1/91, showing a venting rate of less than 0.01 cubic meters/minute.

Monitoring of methylene chloride distillation was conducted on 11/4/91, capturing column start-up and production run. While the venting rate of 0.01 cubic meters/minute remained relatively constant, the VOC concentration rose from 355 ppm (0 lb/hr) during startup to 23,440 ppm (0.09 lb/hr) during full production. The VOC

sensor was destroyed after about four hours of continuous monitoring.

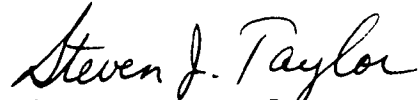
Data accumulated on column operation from 11/6/91 to 11/8/91, captured two complete sequences of vent outflow during batch runs of 1,1,1-trichloroethane and mixed chlorinated solvents. In an effort to preserve the VOC sensor, the instrument was run for 10-15 minutes each hour, but internal condensation destroyed the sensor after about seven hours. Nevertheless, VOC recordings remained consistent with previous runs. A calibration with 20,000 ppm of methane gas was run at the start of the session for verification of accuracy. Results show a mean vent outflow of less than 0.01 cubic meters/minute and mean peak VOC concentrations of 37,500 ppm, for a mean emission rate of 0.08 lb/hr.

Attached are graphs printed from data recorded by the automatic datalogger, and emissions calculations based on recorded data. The VOC sensor output was recorded as volts (0.0 to 1.0), equating to 50,000 ppm at 1.0 volts.

It can be seen from these preliminary results that VOC emissions from the fractionation column are far below the 40CFR264, Subpart AA, threshold of 3 lb/hr. which would require the installation of control devices, as well as being far below the emissions which would have been calculated according to publication AP-42. Since other process equipment are operated under vacuum, and with materials containing more solids and water, they would not be expected to exceed substantially the VOC emissions levels from the fractionation column. We are currently awaiting delivery of chloride-resistant sensors for the VOC detector, and will continue monitoring all equipment.

Due to the equipment problems cited, and in light of results already obtained, we will not be able to complete monitoring and analysis of all process vents by November 15, as originally proposed, and now propose that a complete report be submitted no later than December 31, 1991. We remain aware that, should these studies indicate that control devices must be installed, such installation must be completed by June 21, 1992.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

ST/drs
attachments

cc: Paul Manak, LES, Bartow
Ashley Chadwick, LES, Antioch
Bill Crawford, FDER, Tampa
Satish Kastury, FDER, Tallahassee
Tom John, P.E.

D. E. R.

NOV 15 1990

SOUTHWEST DISTRICT
TAMPA

AIR EMISSIONS MONITORING RESULTS

RUN # VOCTES11/12 DATE: 10/24/91

Material processed: 1,1,1-Trich.

Process vent = Column

Mean venting velocity (ft/min)= 36.8

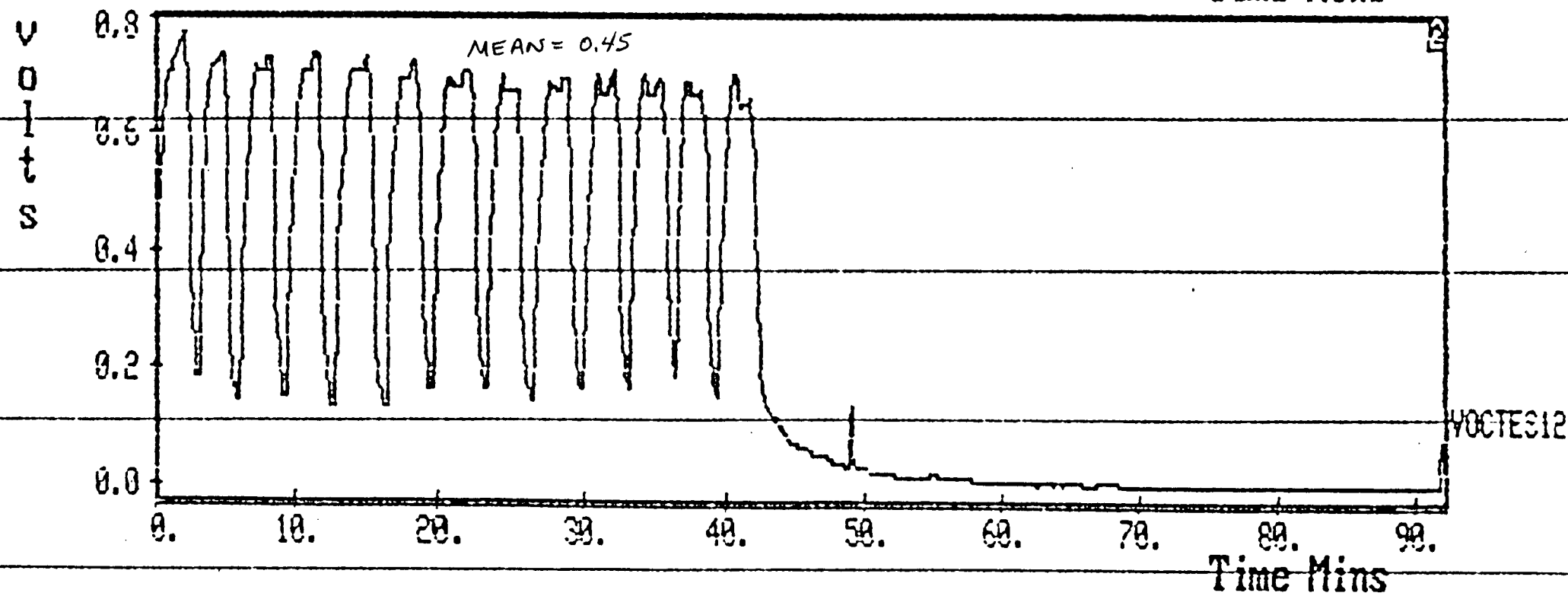
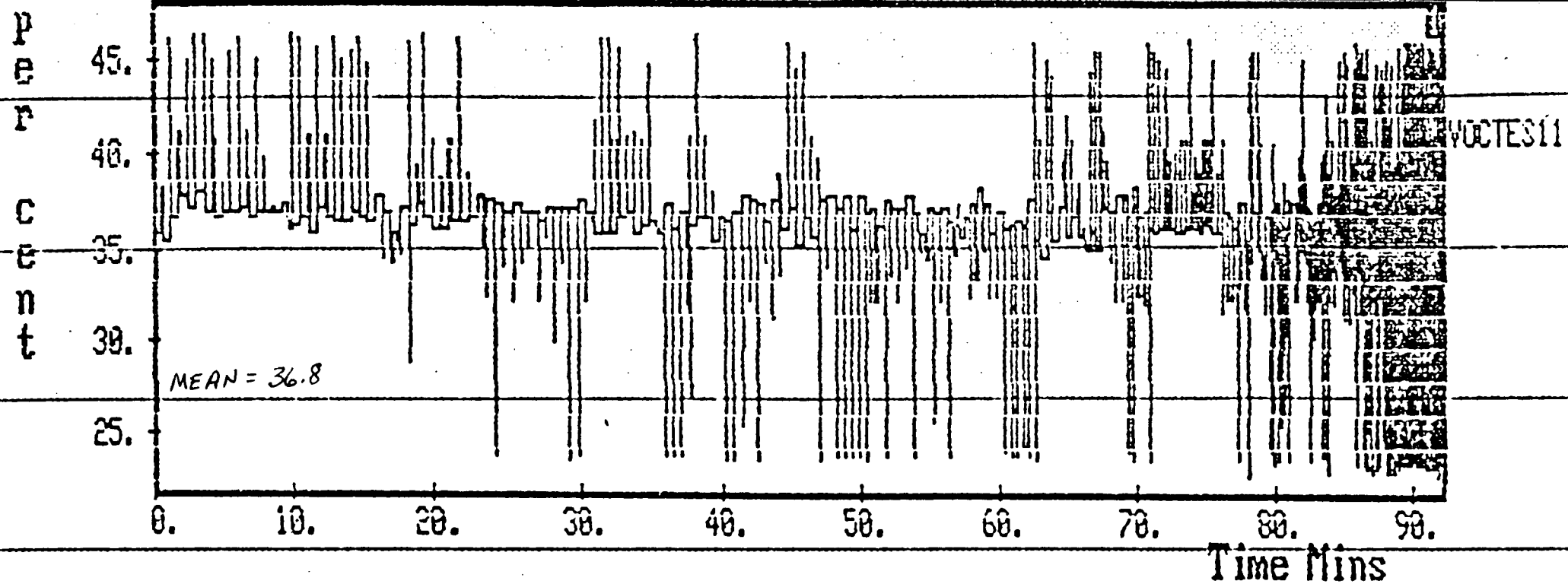
Mean VOC concentration (ppm)= 22500

Total hours in this run= 16

Volume vented per minute (cuM)= .01

VOCs vented per hour (lb)= .09

Total VOCs vented this run (lb)= 1.47



AIR EMISSIONS MONITORING RESULTS

RUN # PERC11 DATE: 11/01/91

Material processed: Perchloroethylene

Process vent = Column

Mean venting velocity (ft/min)= 5.07

Mean VOC concentration (ppm)= 0

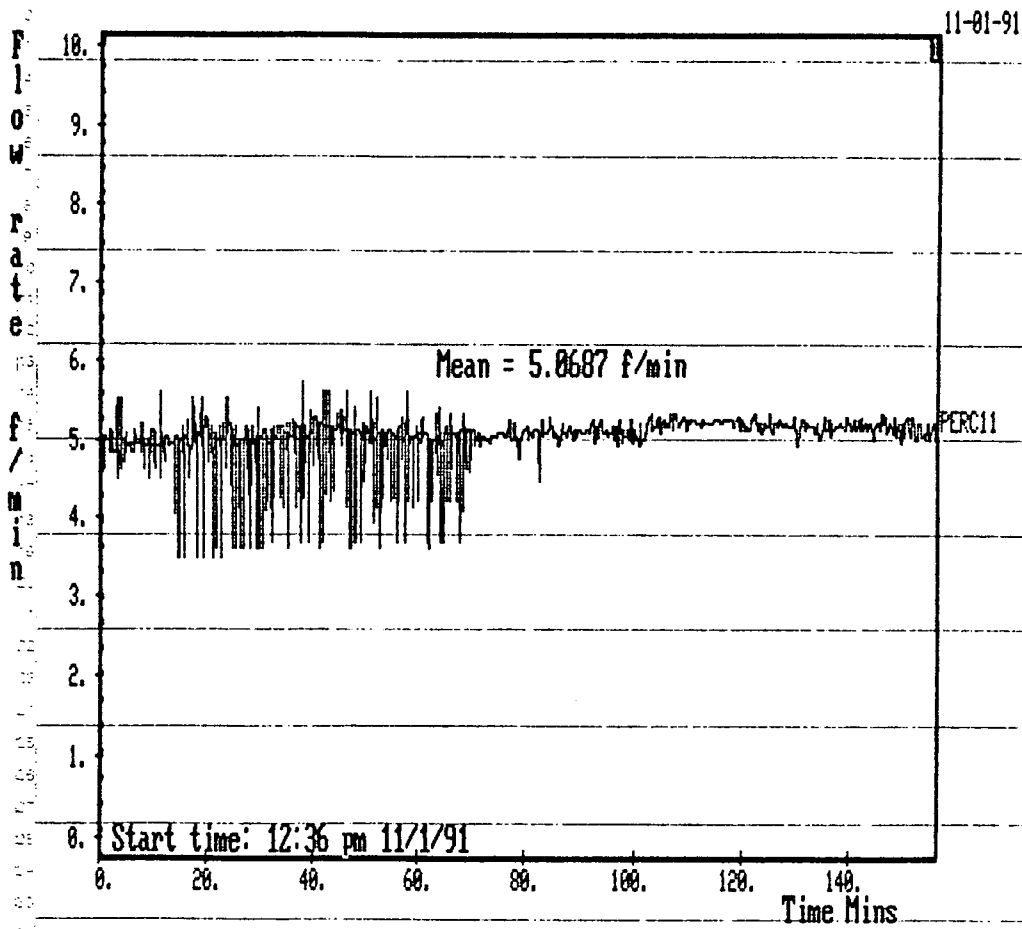
Total hours in this run= 2.5

Volume vented per minute (cuM)= 0

VOCs vented per hour (lb)= 0

Total VOCs vented this run (lb)= 0

10000



AIR EMISSIONS MONITORING RESULTS

RUN # 11-04-11/12 DATE: 11/04/91

Material processed: Methylene Chloride

Process vent = Column

Mean venting velocity (ft/min)= 51.53

Mean VOC concentration (ppm)= 355

Total hours in this run= 4.4

Volume vented per minute (cuM)= .01

VOCs vented per hour (lb)= 0

Total VOCs vented this run (lb)= .01

AIR EMISSIONS MONITORING RESULTS

RUN # 11-04-11/12 DATE: 11/04/91

Material processed: Methylene Chloride

Process vent = Column

Mean venting velocity (ft/min)= 51.53

Mean VOC concentration (ppm)= 23440

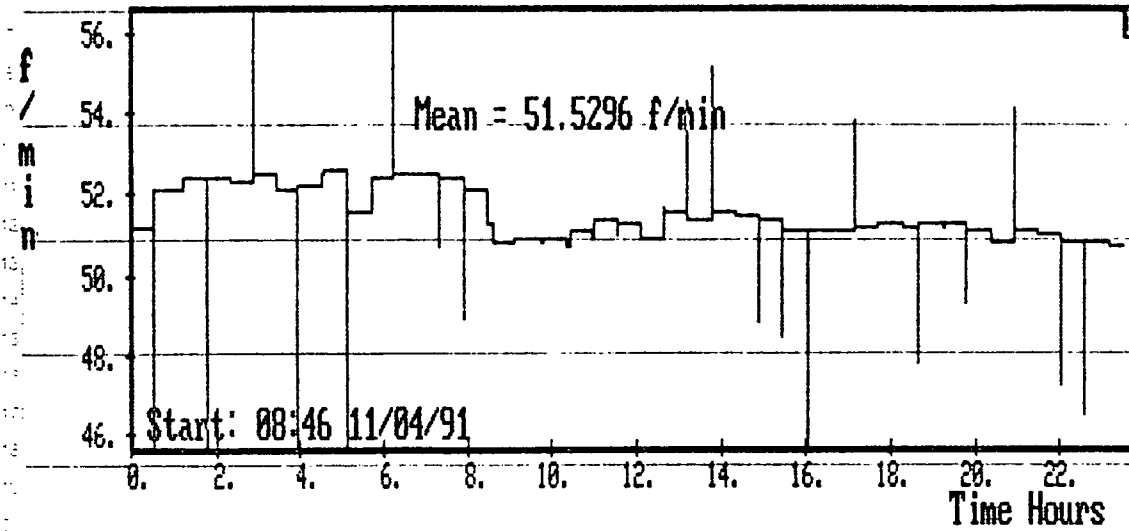
Total hours in this run= 3.6

Volume vented per minute (cuM)= .01

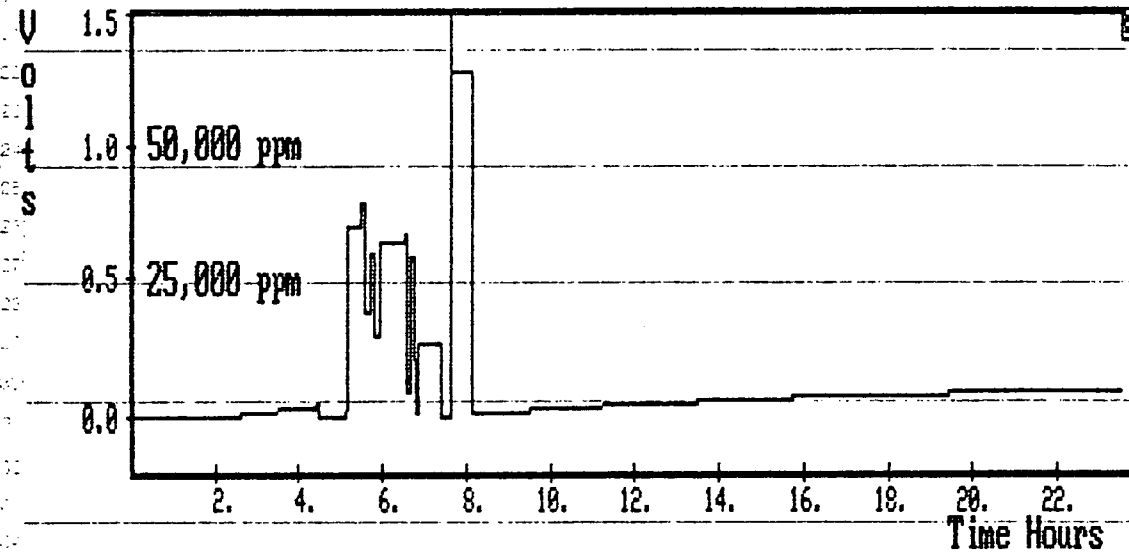
VOCs vented per hour (lb)= .09

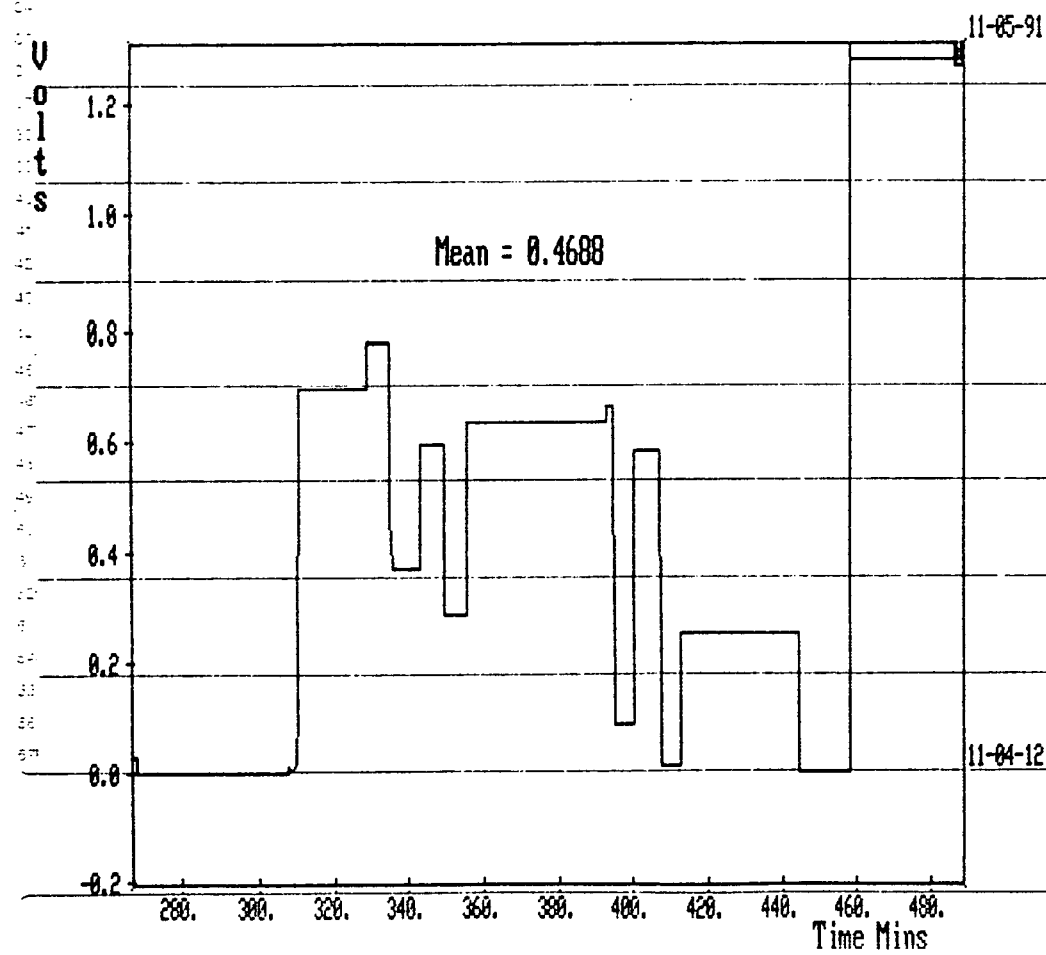
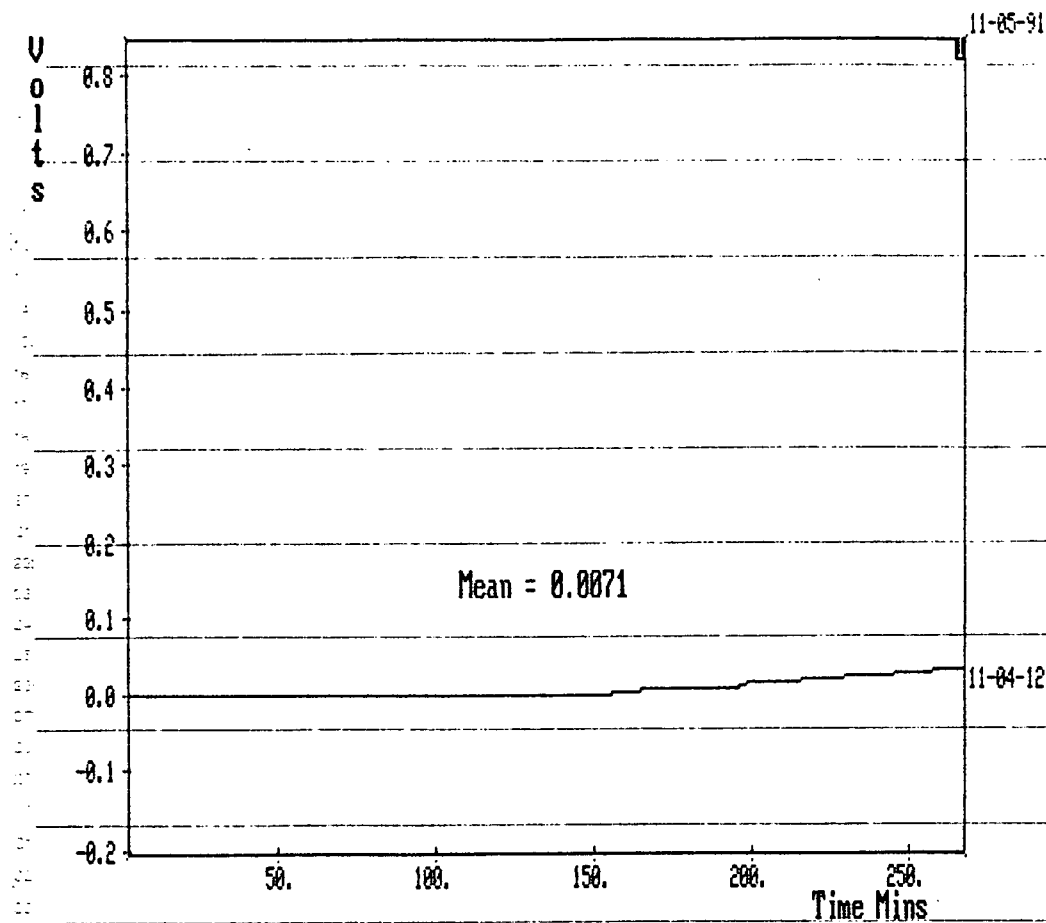
Total VOCs vented this run (lb)= .31

11-05-91



11-04-12





AIR EMISSIONS MONITORING RESULTS

RUN # 11-06-11/12 DATE: 11/6-8/91

Material processed: 1,1,1-Trich.

Process vent = Column

Mean venting velocity (ft/min)= 19.36

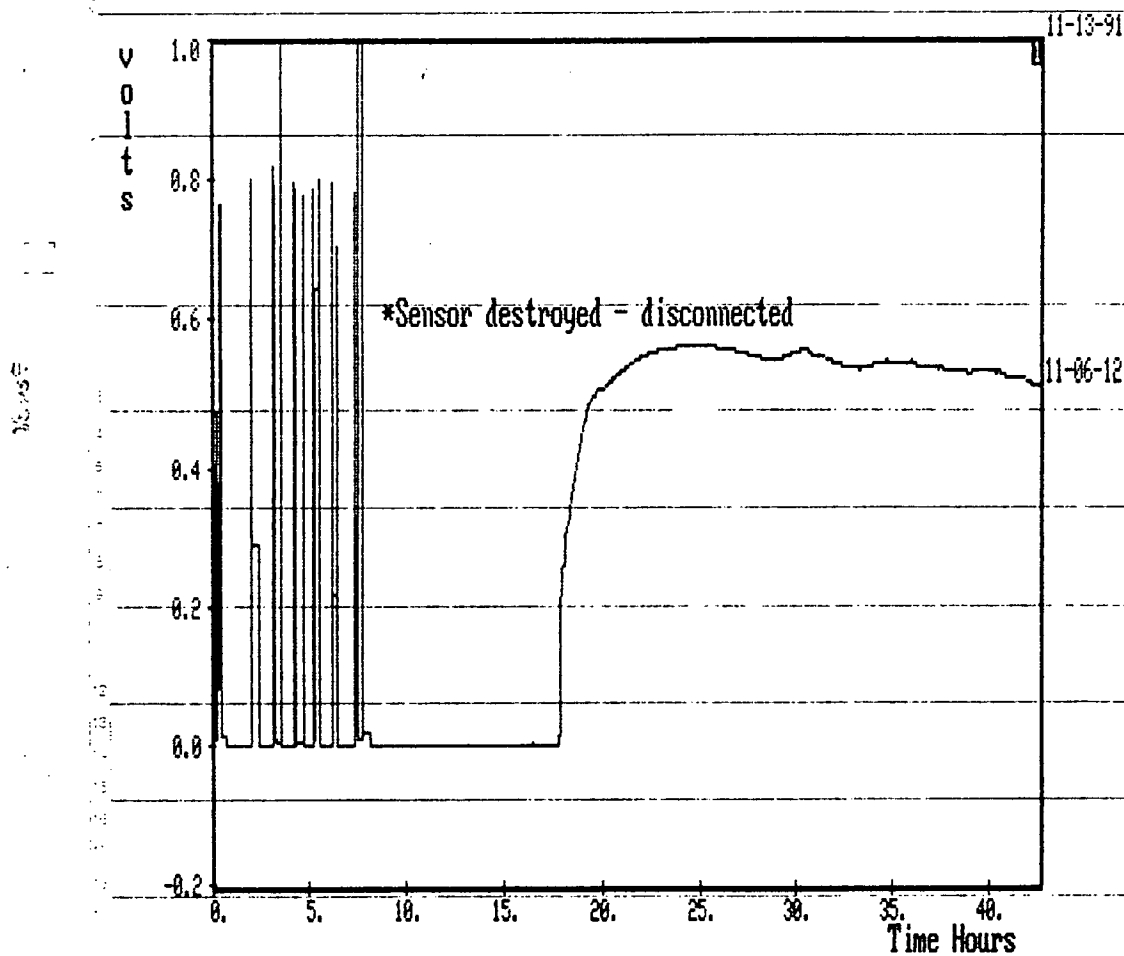
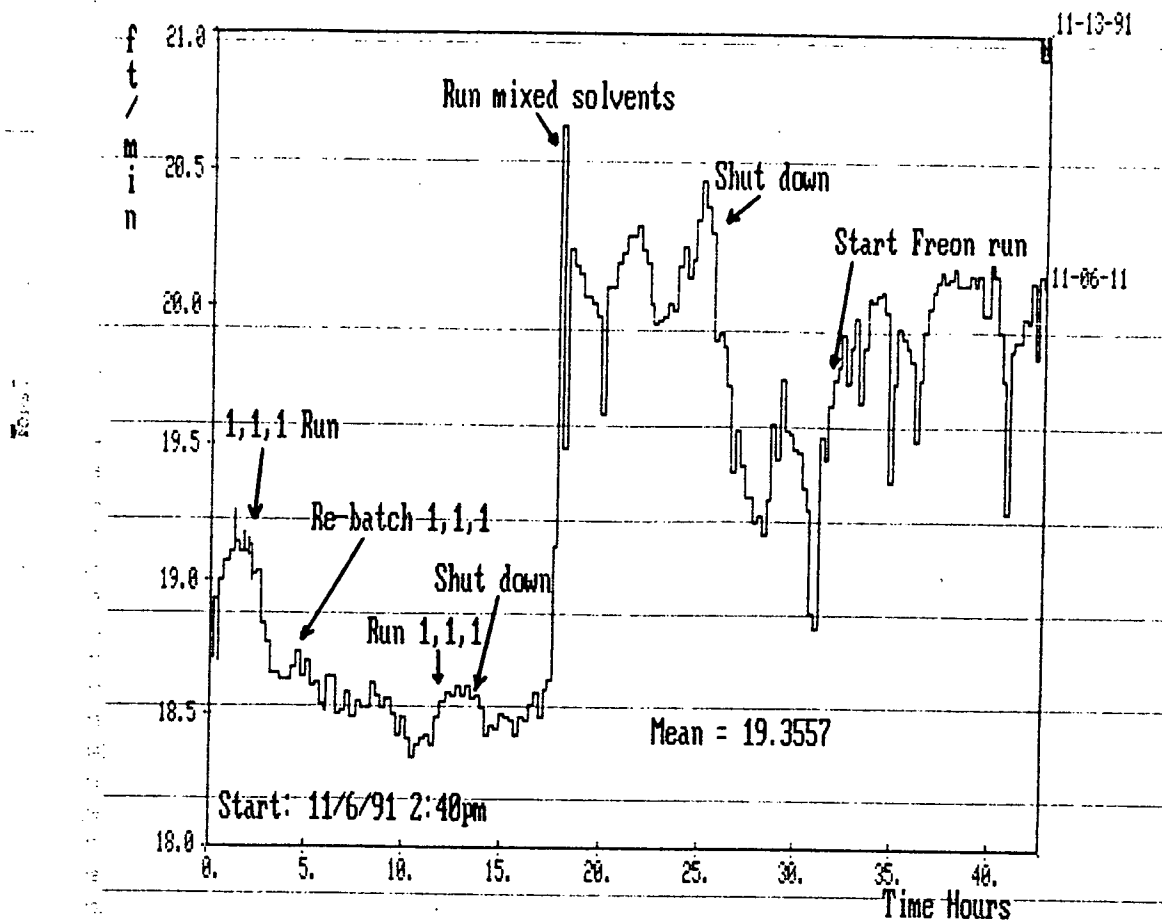
Mean VOC concentration (ppm)= 37500

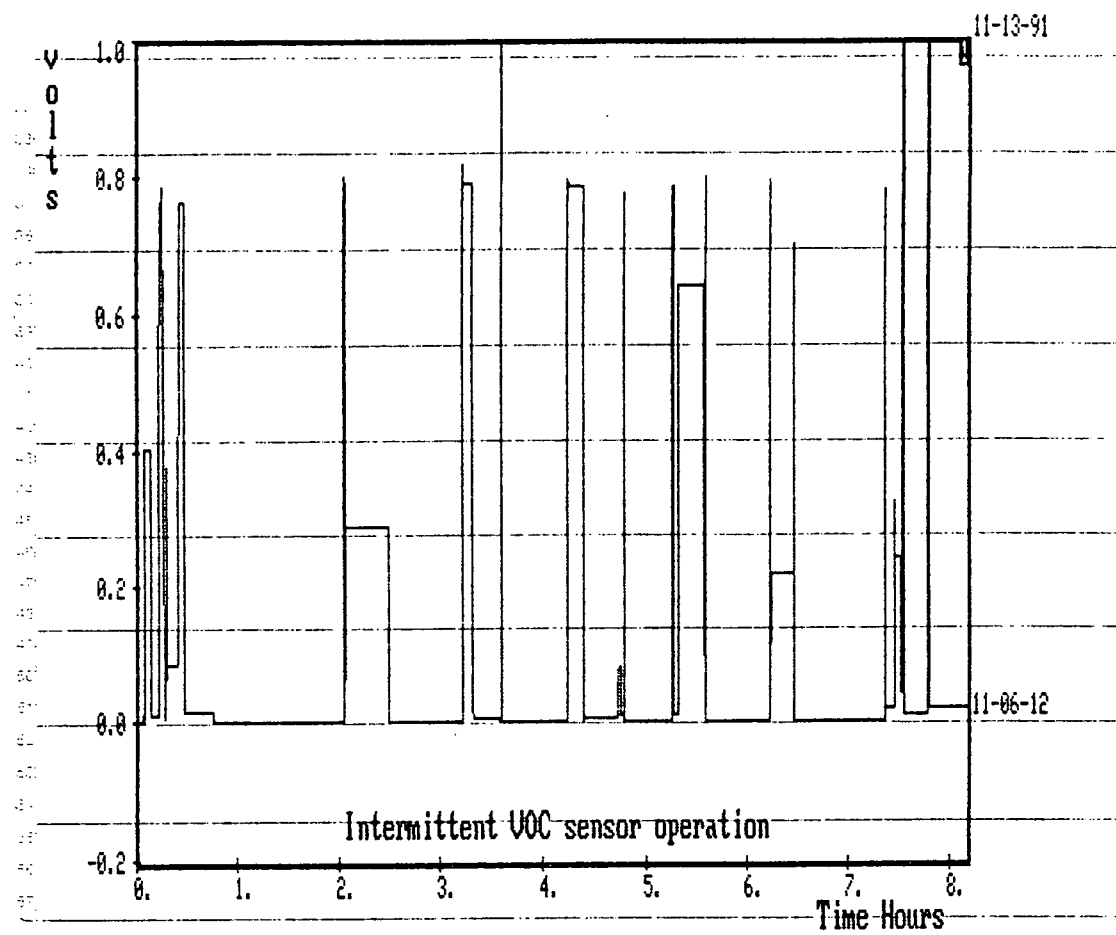
Total hours in this run= 43

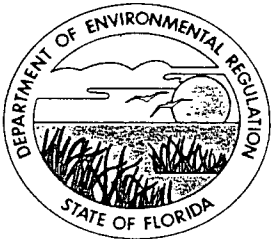
Volume vented per minute (cuM)= 0

VOCs vented per hour (lb)= .08

Total VOCs vented this run (lb)= 3.47







Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

November 14, 1991

Carol M. Browner, Secretary

Mr. Steven Taylor
Safety & Compliance Manager
Laidlaw Environmental Services
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: Workshop to Discuss Issuance/Modification of State Permits
for Managing TC Wastes

Dear Mr. Taylor:

The State of Florida adopted the Toxicity Characteristic (TC) test in the recently revised 17-730 rule. In order to clarify the relationship between your status with EPA and state permitting requirements, you are invited to attend a workshop to be held on December 13, 1991 at the Roadway Inn in Orlando. The workshop will cover the impact of the newly adopted rule on regulated facilities, state permitting procedures for either permit issuance or modification and revised hazardous waste permit fees.

In order to assist us in planning for adequate facilities and materials, please let us know who will be attending from your facility by December 4, 1991. A registration form is enclosed. A copy of workshop materials will be provided on disk in Word Perfect format. If necessary, printed copies can be provided after the workshop. An agenda for the workshop is attached. There is no fee for attending the workshop.

The telephone number for reservations at the Roadway Inn is 1-800-826-4847. You should request the room rate for the TC Workshop. The Inn is located at 9956 Hawaiian Court just off International Drive.

If you have any questions or need additional information on the workshop, please call Mr. Doug Outlaw at 904/488-0300.

Sincerely,

Bill Neime

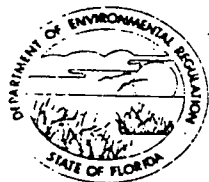
for

Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/DGO/rz

Enclosures

cc: Jim Kutzman, EPA/Region IV
District Program Administrators



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

A, 3-c

FROM: BILL CRAWFORD *BC*

DATE: NOVEMBER 6, 1991

SUBJECT: LAIDLAW ENVIRONMENTAL SERVICES OF BARTOW FLD 980 729 610
OPERATING PERMIT APPLICATION HC53-170970
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 SCARABROUGH EPA/REGION IV

Affidavits in 5-c

VIA CERTIFIED MAIL .

November 4, 1991

A, 3-c

D.E.R.

NOV - 5 1991

SOUTHWEST DISTRICT
TAMPA

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

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

Dear Mr. Crawford;

Enclosed please find copies of affidavits of radio broadcast and newspaper publication of the Intent to Issue the referenced permit.

Sincerely,

Steve Taylor
Steve Taylor
Safety and Compliance Manager

ST/drs
enclosures

cc: FDER Tallahassee
USEPA, Region IV

1891A

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

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

RECEIVED

STATEMENT DATE: 10/31/91

NOV - 1 1991

ACCOUNT NUMBER: 10070

L A I D L A W

TERMS : NET 30

LATE CHARGE : 1.5% per month on
unpaid balance.

=====
 LAIDLAW ENVIRONMENTAL
 170 BARTOW AIRPORT
 BARTOW, FLORIDA 33830
 =====

FOLLOW THE YELLOWJACKETS AS FOOTBALL WINDS DOWN..BASKETBALL'S NEXT..AM 1130

INVOICE	DATE	TERMS OR REF	CODE	DEBITS	CREDITS	BALANCE
		BALANCE FWD.				25.00
9804	10/31/91	1-60s@16	0	16.00		41.00
				16.00	0.00	

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

signed.
 Sworn to and subscribed before me this
31st day of Oct, 19 91

Susan E. Thornburg
 Notary Public

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

CODE

0 - SALE	5 - PAYMENT
1 - PROD CH	6 - CREDIT
2 - TAX	7 - DISCNT
3 - SERV. CH.	8 - COMMISSN
4 - MISC. DB	9 - MISC. CR

TOTAL DUE

=====
 41.00
 =====

WWBF AFFIDAVIT

Page 1 Copy 1 of 1

DATE	ACCOUNT NUMBER	COMMERCIAL TITLE	TIME OR EVENT	LENGTH	UNIT COST
OCT 18	10070-00	LAIDLAW ENVIRON SVCS	2:12 PM	60	\$16.00
	EPA LEGAL NOTICE				

AMOUNT DUE \$16.00

These announcements were broadcast as shown above.

State Of Florida
County Of Polk

Sworn on this Thu Oct 31, 1991

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

Sworn to and subscribed before me this
31st day of Oct, 1991

Susan E. Thornburg
Notary Public

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

NOTICE OF COMPLETE APPLICATION

Pursuant to Section 17-730.220(6)(a), FAC, the Florida Department of Environmental Regulation (Department), within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall publish a notice, in a newspaper of general circulation in the area of the proposed construction that a complete permit application has been received.

This notice is to inform any interested party that the Department has received a complete hazardous waste construction permit application from Laidlaw Environmental Services of Bartow, Inc. (LESB) located at 170 Bartow Municipal Airport in Bartow, Polk County, Florida. This means that LESB has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action which may be either permit issuance or permit denial.

The Department will publish its Notice of Intended Agency Action by November 1, 1991.

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No.

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Stephen DeWitt, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of Complete Application

in the matter of

Hazardous Waste Permit

in the

Court, was published in said newspaper in the issues of

October 18;

1991

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed Stephen DeWitt
Controller

Sworn to and subscribed before me this 18th

day of October A.D. 19 1991

(Seal)

Barbara Shippen
Notary Public

My Commission Expires Notary Public, State of Florida at Large
18816 My Commission Expires Nov. 11, 1994
Lardlow

NOTICE OF COMPLETE APPLICATION
Pursuant to Section 17-730.220(6)(a), FAC, the Florida Department of Environmental Regulation (Department), within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall publish a notice, in a newspaper of general circulation in the area of the proposed construction that a complete permit application has been received. This notice is to inform any interested party that the Department has received a complete hazardous waste construction permit application from Laidlaw Environmental Services of Bartow, Inc. (LESB) located at 170 Bartow Municipal Airport in Bartow, Polk County, Florida. This means that LESB has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action which may be either permit issuance or permit denial. The Department will publish its Notice of Intended Agency by November 1, 1991.
C-824 - 10-18, 1991

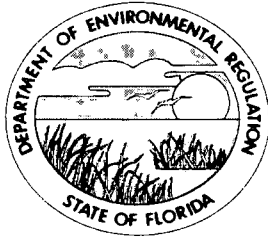
RECEIVED

OCT 29 1991

LAIDLAW

04 18, 91 + vt = 12-2-91

C 824



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

11-05-91

STEVEN TAYLOR
LAIDLAW ENVIRONMENTAL SVC OF BARTOW LOC: 170 BARTOW MUNICIPAL AIRPORT
170 BARTOW MUNICIPAL AIRPORT
BARTOW FL 33830

RE: Facility ID # FLD980729610
170 BARTOW MUNICIPAL AIRPORT
BARTOW

Based on information supplied by you, we have processed and accepted at the state level your request for the facility identified with the above ID number to receive the following name change under RCRA:

FROM: TRICIL RECOVERY SERVICES

TO: LAIDLAW ENVIRONMENTAL SVC OF BARTOW

The status of your facility:

Generator.
Storer.
Transporter.

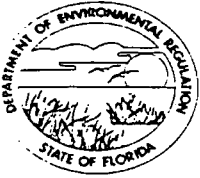
will remain unchanged.

We are advising EPA of this change. Please notify us if there is any further change in your operations which would affect your status.

Sincerely,

Michael X. Redig
Environmental Supervisor II
Hazardous Waste Management Section

cc: Dave Gray - EPA/Region IV
DER/Tampa
GMS-ID # 4053P80781



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

MISSING

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

TO: Satish Kastury

FROM: Bill Crawford *BC* *A, 3-C*

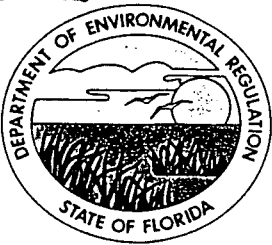
DATE: October 9, 1991

SUBJECT: Laidlaw Environmental Services, Inc., FLD 980 729 610
Construction Permit Application HC53-170970
Draft Permit

Attached is a draft permit for the referenced facility your comments are needed prior to issuance of a Notice of Intended Agency Action. Please provide any response as quickly as possible, but no later than 45 days.

BC/ab
Attachment

C.C. James H. Scarabough



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

CERTIFIED - RETURN RECEIPT

OCT - 7 1991

A, 3-C

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

Attn: Paul Manak, Facility Manager

P 827 903 207

Environmental Services of Bartow, FLD 980 729 610
ion Permit, File No.: HC53-170970
Waste Facility - Polk County

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	Laidlaw Env. Ser. of
Street and No.	Bartow
P.O., State and ZIP Code	170 Bartow Municipal
Postage	PAID

403.815, Florida Statutes, and Rule
Florida Administrative Code, (F.A.C.), the Department
publish and broadcast, at your own expense, this
Agency Action. Attached are the Intent to Issue,
newspaper publication and radio announcement, and
construction permit.

220(6), F.A.C., the notice must be published
in the editorial section of a major local newspaper of
Polk County, and broadcast one time only over
within thirty (30) days of receipt of this
information and broadcast must be provided to the
within (14) days of publication and broadcast of

notice and provide proof of publication and
if omitted time may result in denial of the
without any further notice or opportunity for

Sincerely,

Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

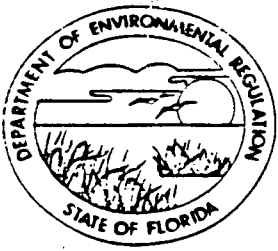
EPA Region IV w/Attachments
Tallahassee w/Attachments
Bartow, City of Bartow
person, Polk County BCC

Combee

Recycled



Paper



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol Browner, Secretary

Richard Garrity, Deputy Assistant Secretary

DATE: 05/21/90

TIME: 1:30 PM

SUBJECT: Tricil AC53-185320

A T T E N D E E S

Name	Affiliation	Telephone
<u>Gary A. Maier</u>	<u>FDER</u>	<u>(813) 623-5561 x412</u>
<u>Ashley T. Chodwick</u>	<u>Laidlaw</u>	<u>(615) 244-8960</u>
<u>Steve Taylor</u>	<u>Laidlaw Bartow</u>	<u>813-533-6111</u>
<u>Victor Sam Agustin</u>	<u>FDER - RCRA</u>	<u>813-623-5561 x390</u>
<u>Paul W. Manak</u>	<u>Laidlaw-Bartow (Tricil)</u>	<u>(813)-533-6111</u>
<u>Harry Kesus</u>	<u>FDER</u>	<u>(813)-623-5561, ext. 419</u>
<u>Tom John</u>	<u>Tom T John Engineering Inc</u>	<u>(813) 985-7881</u>
<u>Chattell Carr</u>	<u>FDER</u>	<u>(813) 623-5561 x408</u>
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DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

VICTOR SAN AGUSTIN

2.

Hazardous Waste

3.

4.

Initial

Date

Initial

Date

Initial

Date

Initial

Date

REMARKS:

FYI.

This after-the-fact
draft construction permit is
presently out on an
"intent to issue".

D.E.R.

MAY 16 1991

SOUTHWEST DISTRICT
TAMPA

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

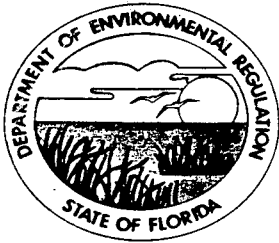
Gary Maier

DATE

5-16-91

PHONE

x412



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:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

DRAFT

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For after-the-fact construction of the drum sampling/storage area and the adjacent fuel mixing/blending area. The sources listed below emit volatile organic compounds (VOC's) and organic solvents. The sources are located in a three sided building.

The specific unit operations and process equipment included in this permit are (a) drum sampling, (b) a drum pumping station to unload solvents from the drums, (c) a chopping pan for size reduction of large pieces of solids, (d) a mechanical shredder to reduce the particle size of solids and blend with liquids, (e) the shredder hopper, (f) the inclined tray feeding the shredder hopper, (g) sludge mix tank T-111, (h) sludge mix tank T-112, (i) sludge mix tank T-114, and (j) the Pegasus drum scraping machine.

A new ventilation system will be installed in the three sided building. The new ventilation system will exhaust vertically to the atmosphere through a 29 foot stack. The new ventilation system will result in a decrease of the ambient concentration of VOC's and organic solvents.

DRAFT

Location: 170 Bartow Municipal Airport, Bartow, FL.

UTM: 17-424.0 E 3091.9 N NEDS NO: 0167 Point ID: 03

Replaces Permit No.: Not Applicable

PERMITTEE:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.

2. The only VOC's and organic solvents that these sources are permitted to process are listed below.

[Rule 17-2.620(1)(a), F.A.C.].

[As specified in the permit application].

Acetone

Ethyl Acetate

Isopropyl Acetate

Methyl Acetate

Ethyl Alcohol

Hexane

Isopropyl Alcohol

Methylene Chloride

1,1,1-Trichloroethane

1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon TF)

Trichloroethylene

Toluene

Xylene

Methyl Ethyl Ketone

Mineral Spirits

3. The drum sampling rate shall not exceed 20 drums per hour and shall not exceed 1,500 drums per week.

[Rule 17-2.620(1)(a), F.A.C.].

[As specified in the permit application].

4. During drum sampling, the total time that liquid surface is exposed to the atmosphere shall not exceed 20 minutes during any one hour period (an average of one minute per drum).

[Rule 17-2.620(1)(a), F.A.C.].

[As specified in the permit application].

5. The maximum throughput rate for the fuel mixing/blending sources shall not exceed 356 gallons per hour, and shall not exceed a total of 3,110,000 gallons in any 12 consecutive month period. [Rule 17-2.620(1)(a), F.A.C.].

[As specified in the permit application].

6. Tricil Recovery Services, Inc. shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 17-2.620(2), F.A.C.].

DRAFT

PERMITTEE:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

SPECIFIC CONDITIONS:

DRAFT

7. These sources are permitted to operate 24 hours per day, 7 days per week, and 52 weeks per year (8,760 hours per year).

8. In order to minimize air emissions during drum sampling, Tricil Recovery Services, Inc. shall follow the drum sampling procedure submitted as attachment 4 of the permit application. [Rule 17-2.620(1)(a), F.A.C.].
[As specified in the permit application].

9. To the extent it is reasonably practicable, each source in the fuel mixing/blending area shall be equipped with a close fitting hood or cover. Whenever possible, the hood or cover shall be closed. [Rule 17-2.620(1)(a), F.A.C.].

10. Wherever or whenever it is reasonably practicable, liquid transfers (including recirculation) to the sources covered by this permit shall be accomplished through submerged or bottom loading rather than splash filling. [Rule 17-2.620(1)(a), F.A.C.].

11. Each pump "in light liquid service" (defined in 40 CFR 60.481) shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, then a leak is detected. The leak shall be repaired in accordance with specific condition #15.
[Rule 17-2.660, F.A.C. and 40 CFR 60.482-2].

12. Each pump "in light liquid service" (defined in 40 CFR 60.481) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b), except as provided in 40 CFR 60.482-1(c) and paragraphs (d), (e), and (f) of 40 CFR 60.482-2. If an instrument reading of 10,000 ppm or greater is measured, then a leak is detected. The leak shall be repaired in accordance with specific condition #15.
[Rule 17-2.660, F.A.C. and 40 CFR 60.482-2].

13. Each valve "in light liquid service" (defined in 40 CFR 60.481) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b) and shall comply with paragraphs (b) through (e) of 40 CFR 60.482-7, except as provided in paragraphs (f), (g), and (h) of 40 CFR 60.482-7, 40 CFR 60.483-1, 2, and 60.482-1(c). If an instrument reading of 10,000 ppm or greater is measured, then a leak is detected. The leak shall be repaired in accordance with specific condition #15.
[Rule 17-2.660, F.A.C. and 40 CFR 60.482-7].

PERMITTEE:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

SPECIFIC CONDITIONS:

14. Pumps and valves "in heavy liquid service" (defined in 40 CFR 60.481), pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days by the method specified in 40 CFR 60.485(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, then a leak is detected. The leak shall be repaired in accordance with specific condition #15.

[Rule 17-2.660, F.A.C. and 40 CFR 60.482-8].

15. When a leak is detected, a first attempt at repair shall be made no later than 5 calendar days after the leak is detected. The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9.

[Rule 17-2.660, F.A.C., 40 CFR 60.482-2, -7, and -8].

16. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1(c). Tricil Recovery Services, Inc. shall comply with the applicable requirements of 40 CFR 60.482-6.

[Rule 17-2.660, F.A.C., and 40 CFR 60.482-6].

17. Tricil Recovery Services, Inc. shall comply with the recordkeeping requirements of 40 CFR 60.486.

[Rule 17-2.660, F.A.C. and 40 CFR 60.486].

18. Tricil Recovery Services, Inc. shall comply with the reporting requirements of 40 CFR 60.487.

[Rule 17-2.660, F.A.C. and 40 CFR 60.487].

19. Tricil Recovery Services, Inc. shall keep a daily record log to document compliance with specific conditions #2, #3, and #5. The log shall be retained for at least two years and be available to the Department upon request. At a minimum, the records in the log shall include (a) the number of drums received, (b) the chemical composition of each drum received, ~~(c) the number of hours of drum sampling,~~ (d) the number of drums sampled, (e) the daily average number of drums sampled per hour, (f) the number of hours of fuel mixing/blending, (g) the quantity of fuel produced in gallons, and (h) the daily average number of gallons of fuel produced per hour. The log shall include a monthly total and a running cumulative 12 consecutive month total to ensure that annual limits are not exceeded. [Rule 17-4.070(3), F.A.C.].

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PERMITTEE:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

SPECIFIC CONDITIONS: **DRAFT**

20. Tricil Recovery Services, Inc. shall report any proposed change or increase in production rate to the Department of Environmental Regulation for proper processing.
[Rules 17-4.070(3) and 17-2.100(127), F.A.C.].

21. In order to determine the background ambient concentration of VOC's and organic solvents resulting from the other sources at Tricil's Bartow facility, Tricil Recovery Services, Inc. shall review the emissions from each source at the Bartow facility, evaluate the need for control devices or procedural changes, and estimate the ambient contribution from each source. Tricil Recovery Services, Inc. shall present the results from this review to the Department prior to obtaining an operating permit for the sources covered by this permit.
[Commitment made in a letter dated December 21, 1990].

22. All equipment, pipes, hoses, lids, fittings, etc. shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions, and spills of solvent materials.
[Rule 17-2.620(1)(a), F.A.C.].

23. In order to provide reasonable assurance that acceptable ambient concentrations of VOC's and organic solvents are not exceeded, there shall be no device which (a) reduces the vertical momentum of the stack gas, or (b) reduces the vertical dispersion of the stack gas. [Rule 17-4.070(3), F.A.C.].

24. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-2, or any other requirements under federal, state, or local law. The 1990 federal Clean Air Act amendments may impact these sources at some future date. Tricil Recovery Services, Inc. shall comply with any applicable future regulations when they become effective. [Rule 17-2.210, F.A.C.].

PERMITTEE:

Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

PERMIT/CERTIFICATION

Permit No: AC53-185320
County: Polk
Expiration Date: 02/29/92
Project: Drum sampling/storage,
Fuel mixing/blending.

SPECIFIC CONDITIONS:

25. Tricil Recovery Services, Inc. shall submit,
- (A) an application for an operation permit (Certificate of Completion of Construction),
 - (B) the appropriate application fee,
 - (C) an explanation as to why it is not reasonably practicable to achieve the goals of specific conditions #9 and #10 for each source that will not achieve those goals,
 - (D) an up-to-date copy of the records required by specific conditions #17 and #19 documenting at least 3 months of compliance, and
 - (E) the results from the review required by specific condition #21,
- to the Southwest District Office of the Department of Environmental Regulation by December 31, 1991.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

DRAFT

Dr. Richard D. Garrity
Deputy Assistant Secretary
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Phone (813) 623-5561

DRAFT

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, State, or local laws or regulations. This permit is not 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 this 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are 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 and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

- (c) Sample or monitor 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 provide the Department with the following information:

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

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.

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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 Rule 17-4.120 and 17-730.300, Florida Administrative Code, 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

DRAFT

- () 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)
- (x) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- (b) The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used;
 - 6. 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 the 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 corrected promptly.

DRAFT



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

OCT - 7 1991

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

A, 3-c

Re: Laidlaw Environmental Services of Bartow, Inc.
Hazardous Waste Construction Permit Application
File No.: HC53-170970

Dear Mr. Manak:

Pursuant to Section 17-730.220(6)(a), FAC, the Department, within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall notify each unit of local government within 3 miles of the proposed facility, that a complete permit application has been received.

This notice is to inform you, as a representative of Laidlaw Environmental Services of Bartow, Inc. (LESB), that the Department has notified the affected local governments that it has received a complete hazardous waste construction permit application from the above referenced applicant. This means that LESB has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action and the Department's intended agency action may be either permit issuance or permit denial.

The Department will publish its Notice of Intended Agency Action by November 1, 1991 pursuant to Section 17-730.220(6)(b), FAC.

If you have any questions regarding this notice, please contact William Crawford of my staff at (813) 623-5561, extension 388.

Sincerely,

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

RDG/vsab

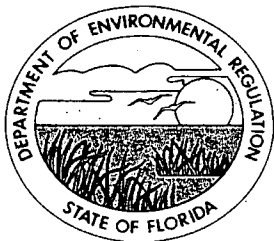
cc: Satish Kastury, BWPR
James Scarbrough, USEPA IV

NOTICE OF COMPLETE APPLICATION

Pursuant to Section 17-730.220(6)(a), FAC, the Florida Department of Environmental Regulation (Department), within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall publish a notice, in a newspaper of general circulation in the area of the proposed construction that a complete permit application has been received.

This notice is to inform any interested party that the Department has received a complete hazardous waste construction permit application from Laidlaw Environmental Services of Bartow, Inc. (LESB) located at 170 Bartow Municipal Airport in Bartow, Polk County, Florida. This means that LESB has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action which may be either permit issuance or permit denial.

The Department will publish its Notice of Intended Agency Action by November 1, 1991.



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

OCT - 7 1991

Mayor Orlando Wright
City of Bartow
450 N. Wilson Avenue
Bartow, Florida 33830

HC53-170976

A, 3-C

Re: Laidlaw Environmental Services of Bartow, Inc.
Hazardous Waste Construction Permit Application

Dear Mayor Wright:

Pursuant to Section 17-730.220(6)(a), FAC, the Department, within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall notify each unit of local government within 3 miles of the proposed facility, that a complete permit application has been received.

This notice is to inform you, as a representative of your local government, that the Department has received a complete hazardous waste construction permit application from the referenced applicant. This means that Laidlaw Environmental Services of Bartow, Inc. (LESB) has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action and the Department's intended agency action may be either permit issuance or permit denial.

The Department will publish its Notice of Intended Agency Action by November 1, 1991 pursuant to Section 17-730.220(6)(b), FAC.

If you have any questions regarding this notice, please contact William Crawford of my staff at (813) 623-5561, extension 388.

Sincerely,

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

RDG/vsab

cc: Satish Kastury, BWPR
James Scarbrough, USEPA 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

OCT - 7, 1991

Marlene Young, Chairperson
Polk County Board of County
Commissioner
Post Office Box 60
Bartow, Florida 33830

Re: Laidlaw Environmental Services of Bartow, Inc.
Hazardous Waste Construction Permit Application

Dear Ms. Young:

Pursuant to Section 17-730.220(6)(a), FAC, the Department, within 30 days of receipt of a complete application for a hazardous waste facility construction permit, shall notify each unit of local government within 3 miles of the proposed facility, that a complete permit application has been received.

This notice is to inform you, as a representative of your local government, that the Department has received a complete hazardous waste construction permit application from the referenced applicant. This means that Laidlaw Environmental Services of Bartow, Inc. (LESB) has provided all the necessary information required for the Department to take final agency action on the permit application. Be advised, this notice is not final agency action and the Department's intended agency action may be either permit issuance or permit denial.

The Department will publish its Notice of Intended Agency Action by November 1, 1991 pursuant to Section 17-730.220(6)(b), FAC.

If you have any questions regarding this notice, please contact William Crawford of my staff at (813) 623-5561, extension 388.

Sincerely,

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

RDG/vsab

cc: Satish Kastury, BWPR
James Scarbrough, USEPA IV



D.E.R.

HAND DELIVERED

JUN 21 1991

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: Construction Permit Application #HC53-170970
Third Notice of Deficiency (NOD)

Dear Mr. San Agustin;

By way of this letter and attachments, plus responses submitted in the letter of May 10, 1991 (attached), your concerns expressed in the referenced NOD should be satisfied.

DER Item 1. The response was indicated to be located on page 12-17 which appears to be a February 6, 1991 letter from R. O. Covington & Associates. The letter was not certified by Mr. Covington. It must be certified separately pursuant to 264.192(a).

The letter also states the P.E. assessment is only for tanks 151 through 156. Section 1.4.2 however indicates a sludge mix tank T-114 is going to be installed. The Department intends to permit T-114 as a tank regulated under 264 Subpart J. A P.E. assessment of T-114 and its ancillary equipment must be provided pursuant to 264.192. A P.E. assessment of T-151 to 156's ancillary equipment must also be provided. Mr. Covington's assessment included only the 6 tanks and did not include their ancillary equipment.

Although Department staff are aware T-114 is non-existent based on previous inspections, Section 1.4.2 and Page 1-102 fail to make a distinction that T-114 is not yet constructed. Furthermore, Page 1-102 appears to consider T-111, T-112 and T-114 as SWMU's. During a meeting held on February 8, 1991, LESB was provided a letter from EPA which supports the Department's determination that the blending tanks and ancillary equipment are regulated under 264 Subpart J. Page 1-102 must be revised to show these units as being tanks, not SWMU's. Furthermore, the narrative in Section 1.4.2 and Page 1-102 should reflect T-114 as being a proposed tank.

Item 1 Response: Certification of fuel blending process tanks by a Professional Engineer is attached. Also attached is revised page 1-102 showing T-111, T-112, and T-114 as tanks.

DER Item 2: Item 3 states it is LESB's position that T-111, 112 and 114 are not regulated. Although the previous submittals include some information about these tanks, the Department would like LESB to include the specifications into the most recent submittals.

A telephone discussion with Steve Taylor on March 28 indicated that because the information was provided on a previous submittal, LESB does not need to provide them again. Department staff have no objections with this statement. Staff's objection is that LESB seems to expect DER staff to pull out the applicable pages from the previous submittal and then insert them into the appropriate pages. There are quite a considerable number of such pages to be removed and inserted. Department staff have more than enough professional work to act on. We expect LESB to perform this clerical exercise. We at the District Office have tried to consolidate our copy. You must consolidate the Tallahassee and Region IV copies and inform us as soon as you have done so.

Item 2 Response: Appendix I is attached, in its entirety.

DER Item 3: Only the specifications for T-114 and its internal/external components were provided. Tank system information required under § 264.192 includes ancillary equipment as defined in 260.10. We previously requested this type of information under item 3. of our November 9, 1990 NOD. The February 8 submittal provided only a general 9 line paragraph in Section 12.3.3. for ancillary equipment. Chapter 12, entitled Tank Design provided little information about ancillary equipment. Equipment specification in Appendix I provided information only for its immediate adjacent parts.

Equipment associated with T-114 that should qualify as ancillary equipment and for which information was not provided include the following listed items. Drawing K2 was used to identify them.

- a. Stream No. 6 which includes piping connection the inlet and outlet of T-114 with the storage tanks.
- b. Stream No. 8 which includes piping, solids grinder G-143, and and unnumbered pump.
- c. Solids conveyor and associated piping.
- d. Magnetic separator TK-142, basket filter K-144, pump P-146, and associated piping.

- e. An unnumbered vent fan and associated vent piping.
- f. Stream No. 7 which includes piping connecting pump P-126 and T-114.

Item 3 Response: Revised drawing K2 is attached, showing all hazardous waste storage and processing tanks and ancillary equipment which LESB maintains are not ancillary storage devices. There is no solids conveyor (item c) either existing or proposed. Ventilation for the work area is not specific to individual pieces of equipment and therefore not subject to RCRA permitting.

DER Item 3. (continued): The type of information requested regarding this matter includes as follows:

- a. A Florida P.E.'s assessment of the structural integrity of ancillary equipment (Section C.1. of the application).
- b. Description of feed systems (describe each feed piping and waste being fed into T-114), all instrumentation (hi level alarms; temp/pressure gauges, etc.). What is the minimum heating value of the waste in each stream feeding T-114? (Section C.2. of the application)
- c. Include a piping diagram. Flow diagram in K2 do not describe piping size and materials of construction. (Section C.4. of application).
- d. Manufacturer's brochures of ancillary equipment which are not piping; i.e., pumps, basket, filters, solids grinders, etc.
- e. Indicate on DWG. K2 which RCRA regulated pieces of equipment are proposed to be installed.

Item 3 Response (continued): Revised drawing K2 is attached. A P.E. certification of equipment is provided, negating the need for manufacturers' brochures of equipment. Other items were addressed in the May 10, 1991, letter.

DER Item 4: Ancillary equipment information must also be provided for the T-151 thru T-156 tank system. Ancillary equipment referred to include piping, pumps, etc. connecting the T-151 to T-156 tanks with T-101 to T-110 tanks. DWG K3 does not show how waste is transferred from the proposed tanks to T-101 to T-110 or to the various distillation units. The type of information asked for include:

- a. A piping diagram showing how tanks T-151 to T-156 are connected to tanks T-101 to T-110. If any of T-151 to T-156 are connected to the distillation and other recycling units, this piping should also be shown.

- b. In order to facilitate a RCRA inspector's inspection of RCRA regulated ancillary equipment, we request such regulated piping and equipment to given a color unique from non-RCRA waste ancillary equipment. Please propose a color so we can reflect it in the permit.
- c. Size and material of construction of piping and other ancillary equipment.
- d. Indicate on drawing K3 which RCRA regulated tanks and ancillary equipment are proposed to be installed.
- e. Provide a detailed description of how ancillary equipment will be installed in compliance with § 264.192(e).

Item 4 Response: Revised drawing K2, attached, shows the relationship between hazardous waste storage tanks T-101 through T-156. The attached P.E. certification lists sizes and materials of construction. Other items were addressed in the May 10, 1991, letter.

DER Item 5: Item 12 of the second NOD requested that all drawings in Appendix K must be certified by a professional engineer registered in Florida. Drawings K2 and K3 were not certified. Please have them certified.

Item 5 Response: P.E. certified drawing K2 is attached. Drawing K3 is a generalized flow diagram intended only to illustrate the approximate relationships of solvent recovery equipment. Since the solvent recovery process is not subject to this permit, and re-drawing and certification by a P.E. would require additional time and considerable expense, this certification is not being provided. Additionally, to submit such certification would subject any changes in solvent recovery to permit modification requirements.

DER Item 6: The response to item 15. states none of the fuel blending equipment listed in item 15. of the second NOD are regulated under RCRA. These are basically equipment which are not classified as tanks or ancillary equipment but do come in contact with hazardous waste. These equipment would be regulated as miscellaneous units regulated under §264, Subpart X. Based on our review of the flow diagrams, the affected miscellaneous units may include but are not limited to the following:

- a. Shredder (G-123), Hopper (M-122), Inclined Tray ((M-121) and Fan (C-131).
- b. Drum Scraping Machine (L-137) with Fan (C-132).

Since EPA and FDER have determined your fuel blending process does not meet the definition of a recycling process, LESB must provide any information required under Part I of the hazardous waste permit application form pertaining to the above mentioned units and other Subpart X units.

Item 6 Response: Previously addressed in the May 10, 1991, response.

DER Item 7: DWG K2 shows T-112 is not equipped with a vent fan whereas T-111, T-114, L-137, M-122, and M-121 are provided with vent fans. Please explain why T-112 does not need a vent fan.

Item 7 Response: Previously addressed in the May 10, 1991, response.

DER Item 8: We understood you are now the facility manager for LESB. Please provide certification pages showing your signature. Mr. Covington should recertify these new certification pages.

Item 8 Response: Laidlaw Environmental Services maintains that personnel changes do not necessitate re-certifying the application by all signees; however, a new certification page with current signatures is attached.

DER Item 9: Item 29. states all SWMU's have been tabulated on page 1-102, but the tabulation does not include other waste recycling equipment such as the distillation units, freon wash tank, and other recycling units shown in Drawing K3. The tabulation in page 1-102 should be expanded to include all these waste recycling units. Maximum annual waste input rates for each recycling unit should be included as capacities.

Item 9 Response: Previously addressed in the May 10, 1991, response.

DER Item 10: Item 23. states LESB is deleting the N₂/CO blanketing system. Furthermore, a comparison of the previous and the current K3 drawings shows the carbon absorber U-127 has also been deleted. No explanation was provided. Please provide an explanation. The N₂/CO blanketing system and carbon absorber will significantly minimize organic compound releases into the environment. Although not required by a specific rule, applicants in our district who propose to install multiple flammable waste storage tanks have been providing additional control measures to minimize organic compound releases. Pursuant to Section 403.722(3), Florida Statutes, the Department would like to see LESB propose similar control measures and provide a narrative regarding this matter in the Part B. Design features and brochures for whatever control measure is selected should also be provided. The inspection plan should also be revised to include inspections on the control device.

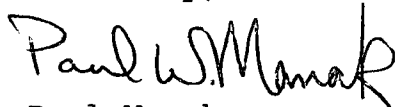
Item 10 Response: Previously addressed in the May 10, 1991 response.

DER Item 11: Two other carbon adsorbers U-311 and U-215 appear to have been deleted from DWG. K3. The December 7 letter from Steve Taylor advised us the construction of the inorganic waste treatment processes will not be pursued. These two adsorbers are part of organic waste storage and are independent of the inorganic system, but they were also deleted without any explanation. Please provide an explanation. Pursuant to 403.722(3), F.S., we would like to see LESB continue to propose installing these carbon adsorbers. Flow diagram K3 should again reflect the proposed installation of these equipment. Design features, brochures, and inspection plans should also be provided.

Item 11 Response: Previously addressed in the May 10, 1991, response.

As always, should you have any questions, please contact either myself or Steve Taylor at (813)533-6111.

Sincerely,



Paul Manak
Facility Manager

PWM/drs

cc: Steve Taylor
Ashley Chadwick
John E. Deal, Jr.
Dave Sprinkle
Barbara Hamilton

1212A



VIA CERTIFIED MAIL

June 17, 1991

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

Re: TSDf Construction Permit Application #HC53-170970
Response to Third Notice of Deficiency

Dear Mr. San Agustin;

As discussed with you on the telephone today, we have experienced some unforeseen delays in obtaining piping and tanks drawings and certifications from our consultant. We expect that we will be able to provide a complete response to the referenced NOD by Friday, June 21, 1991, and respectfully request an extension of time to that date. Your understanding in this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Steve Taylor". The signature is written in dark ink and is positioned above the printed name and title.

Steve Taylor
Safety & Compliance Manager

ST/drs

cc: Paul Manak
Ashley Chadwick
John E. Deal, Jr.
Barbara Hamilton, Esquire

1358A

D. E. R.

JUN 19 1991

SOUTHWEST DISTRICT
TAMPA



D. E. R.

TELECOPIED
CERTIFIED MAIL

MAY 14 1991

May 10, 1991

SOUTHWEST DISTRICT
TAMPA

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

Re: Construction Permit Application #HC53-170970
Third Notice of Deficiency (NOD)

Dear Mr. San Agustin;

This letter with attachments, plus subsequent submittals not later than June 10, 1991, are intended to answer your concerns expressed in the above-referenced NOD.

DER Item 1. The response was indicated to be located on page 12-17 which appears to be a February 6, 1991 letter from R. O. Covington & Associates. The letter was not certified by Mr. Covington. It must be certified separately pursuant to 264.192(a).

The letter also states the P.E. assessment is only for tanks 151 through 156. Section 1.4.2 however indicates a sludge mix tank T-114 is going to be installed. The Department intends to permit T-114 as a tank regulated under 264 Subpart J. A P.E. assessment of T-114 and it's ancillary equipment must be provided pursuant to 264.192. A P.E. assessment of T-151 to 156's ancillary equipment must also be provided. Mr. Covington's assessment included only the 6 tanks and did not include their ancillary equipment.

Although Department staff are aware T-114 is non-existent based on previous inspections, Section 1.4.2 and Page 1-102 fail to make a distinction that T-114 is not yet constructed. Furthermore, Page 1-102 appears to consider T-111, T-112 and T-114 as SWMU's. During a meeting held on February 8, 1991, LESB was provided a letter from EPA which supports the Department's determination that the blending tanks and ancillary equipment are regulated under 264 Subpart J. Page 1-102 must be revised to show these units as being tanks, not SWMU's. Furthermore, the narrative in Section 1.4.2 and Page 1-102 should reflect T-114 as being a proposed tank.

Item 1 Response: Tricil has retained a consultant to evaluate the certification of tanks and ancillary equipment utilized in the fuel blending process. Tricil proposes a response to these items by June 10, 1991. Tank #T-114 was constructed and put into operation in November, 1989, and used until January, 1990. It does exist as indicated. Page 1-102 and Section 1.4.2 therefore need no revision, in this respect. Tanks T-111, T-112, and T-114 will be shown on Page 1-102 as tanks in the June 10 submittal.

DER Item 2: Item 3 states it is LESB's position that T-111, 112 and 114 are not regulated. Although the previous submittals include some information about these tanks, the Department would like LESB to include the specifications into the most recent submittals.

A telephone discussion with Steve Taylor on March 28 indicated that because the information was provided on a previous submittal, LESB does not need to provide them again. Department staff have no objections with this statement. Staff's objection is that LESB seems to expect DER staff to pull out the applicable pages from the previous submittal and then insert them into the appropriate pages. There are quite a considerable number of such pages to be removed and inserted. Department staff have more than enough professional work to act on. We expect LESB to perform this clerical exercise. We at the District Office have tried to consolidate our copy. You must consolidate the Tallahassee and Region IV copies and inform us as soon as you have done so.

Item 2 Response: In the revision of the permit application submitted in February, some Appendix I data were inadvertently omitted, of which Mr. Taylor was not aware of at the time of the telephone conversation referenced. Appendix I is enclosed in its entirety, and will be placed into Department binders by TRSI personnel if so desired. We apologize for any confusion this may have caused.

DER Item 3: Only the specifications for T-114 and its internal/external components were provided. Tank system information required under §264.192 includes ancillary equipment as defined in §260.10. We previously requested this type of information under item 3. of our November 9, 1990 NOD. The February 8 submittal provided only a general 9 line paragraph in Section 12.3.3. for ancillary equipment. Chapter 12, entitled Tank Design provided little information about ancillary equipment. Equipment specification in Appendix I provided information only for its immediate adjacent parts.

Equipment associated with T-114 that should qualify as ancillary equipment and for which information was not provided include the following listed items. Drawing K2 was used to identify them.

- a. Stream No. 6 which includes piping connection the inlet and outlet of T-114 with the storage tanks.
- b. Stream No. 8 which includes piping, solids grinder G-143, and and unnumbered pump.
- c. Solids conveyor and associated piping.
- d. Magnetic separator TK-142, basket filter K-144, pump P-146, and associated piping.
- e. An unnumbered vent fan and associated vent piping.
- f. Stream No. 7 which includes piping connecting pump P-126 and T-114.

Item 3 Response: Material specifications and flow diagrams (Drawing K2) for ancillary equipment will be covered in the June 10, 1991 submittal.

DER Item 3. (continued): The type of information requested regarding this matter includes as follows:

- a. A Florida P.E.'s assessment of the structural integrity of ancillary equipment (Section C.1. of the application).
- b. Description of feed systems (describe each feed piping and waste being fed into T-114), all instrumentation (hi level alarms; temp/pressure gauges, etc.). What is the minimum heating value of the waste in each stream feeding T-114? (Section C.2. of the application)
- c. Include a piping diagram. Flow diagram in K2 do not describe piping size and materials of construction. (Section C.4. of application).
- d. Manufacturer's brochures of ancillary equipment which are not piping; i.e., pumps, basket, filters, solids grinders, etc.
- e. Indicate on DWG. K2 which RCRA regulated pieces of equipment are proposed to be installed.

Item 3 Response (continued): Assessment of ancillary equipment, relevant specifications of such equipment, and drawings in Appendix K are a part of the evaluation to be conducted by the consultant and will be part of the June 10, 1991, submittal. Tank #T-114 is fed by manually dumping 55-gallon drums into the top of it, therefore providing visual assurance that the tank is not overfilled. There is no instrumentation on this open-top tank. Material destined for fuel blending is intended to have a nominal heating value of 5,000 BTU/lb. All equipment shown in drawing K2 is already installed.

DER Item 4: Ancillary equipment information must also be provided for the T-151 thru T-156 tank system. Ancillary equipment referred to include piping, pumps, etc. connecting the T-151 to T-156 tanks with T-101 to T-110 tanks. DWG K3 does not show how waste is transferred from the proposed tanks to T-101 to T-110 or to the various distillation units. The type of information asked for include:

- a. A piping diagram showing how tanks T-151 to T-156 are connected to tanks T-101 to T-110. If any of T-151 to T-156 are connected to the distillation and other recycling units, this piping should also be shown.
- b. In order to facilitate a RCRA inspector's inspection of RCRA regulated ancillary equipment, we request such regulated piping and equipment to given a color unique from non-RCRA waste ancillary equipment. Please propose a color so we can reflect it in the permit.
- c. Size and material of construction of piping and other ancillary equipment.
- d. Indicate on drawing K3 which RCRA regulated tanks and ancillary equipment are proposed to be installed.
- e. Provide a detailed description of how ancillary equipment will be installed in compliance with 264.192(e).

Item 4 Response:

- a. Drawing K3 will be revised to show flow paths between waste storage tanks. Tanks T-151 through T-156 are intended to connect to existing piping consisting of a single line to the distillation area. To be submitted as part of the June 10, 1991, submittal.
- b. Considering the amount of piping at this facility, color-coding of piping is not feasible. Appropriate labeling of piping and equipment should be sufficient.
- c. Material specifications of piping and ancillary equipment will be part of the June 10, 1991 submission.
- d. and e. All equipment has already been installed.

DER Item 5: Item 12 of the second NOD requested that all drawings in Appendix K must be certified by a professional engineer registered in Florida. Drawings K2 and K3 were not certified. Please have them certified.

Item 5 Response: Drawings in Appendix K will be revised and certified and submitted as part of the June 10, 1991, submittal.

DER Item 6: The response to item 15. states none of the fuel blending equipment listed in item 15. of the second NOD are regulated under RCRA. These are basically equipment which are not classified as tanks or ancillary equipment but do come in contact with hazardous waste. These equipment would be regulated as miscellaneous units regulated under 264, Subpart X. Based on our review of the flow diagrams, the affected miscellaneous units may include but are not limited to the following:

- a. Shredder (G-123), Hopper (M-122), Inclined Tray ((M-121) and Fan (C-131).
- b. Drum Scraping Machine (L-137) with Fan (C-132).

Since EPA and FDER have determined your fuel blending process does not meet the definition of a recycling process, LESB must provide any information required under Part I of the hazardous waste permit application form pertaining to the above mentioned units and other Subpart X units.

Item 6 Response:

- a. The Shredder (G-123), Hopper (M-122), and Inclined Tray (M-121) are components of a single machine which is ancillary to sludge mix tanks T-112 and T-114. No fan will be installed on this piece of equipment.
- b. The drum scraping machine loosens material within the container in which it was transported and stored. As such, it is neither subject to 40 CFR 264, Subpart X, nor is it ancillary to fuel blending process equipment, since it is physically separate from any other equipment.

DER Item 7: DWG K2 shows T-112 is not equipped with a vent fan whereas T-111, T-114, L-137, M-122, and M-121 are provided with vent fans. Please explain why T-112 does not need a vent fan.

Item 7 Response: The vent fans on individual pieces of equipment have been deleted from drawings in Appendix K. A decision was made to permit and install general ventilation under the requirements of the Florida DER Air Section.

DER Item 8: We understood you are now the facility manager for LESB. Please provide certification pages showing your signature. Mr. Covington should recertify these new certification pages.

Item 8 Response: Mr. Sanderock signed the application as the authorized representative of Tricil Recovery Services, Inc. The application should remain valid regardless of personnel changes at the facility. This requirement would necessitate obtaining signatures from others (i.e. Bartow Airport Authority). Such requirement would unnecessarily delay the processing of the application, since the Airport Authority might need to review the entire application once again before signing.

DER Item 9: Item 29. states all SWMU's have been tabulated on page 1-102, but the tabulation does not include other waste recycling equipment such as the distillation units, freon wash tank, and other recycling units shown in Drawing K3. The tabulation in page 1-102 should be expanded to include all these waste recycling units. Maximum annual waste input rates for each recycling unit should be included as capacities.

Item 9 Response: Page 1-102 has been revised to include waste recycling units. Capacity of the units should show actual vessel capacity, as in any other vessel; not maximum annual throughput.

DER Item 10: Item 23. states LESB is deleting the N₂/CO₂ blanketing system. Furthermore, a comparison of the previous and the current K3 drawings shows the carbon absorber U-127 has also been deleted. No explanation was provided. Please provide an explanation. The N₂/CO₂ blanketing system and carbon absorber will significantly minimize organic compound releases into the environment. Although not required by a specific rule, applicants in our district who propose to install multiple flammable waste storage tanks have been providing additional control measures to minimize organic compound releases. Pursuant to Section 403.722(3), Florida Statutes, the Department would like to see LESB propose similar control measures and provide a narrative regarding this matter in the Part B. Design features and brochures for whatever control measure is selected should also be provided. The inspection plan should also be revised to include inspections on the control device.

Item 10 Response: The nitrogen blanketing system included a carbon adsorber. Tricil Recovery Services no longer feels that the system originally proposed would be cost-effective or particularly efficient. Emissions from waste storage tanks were evaluated by the Department's Air Permitting Section and were determined to be within acceptable limits. The facility will continue to evaluate methods of reducing material losses, but cannot be expected to mimic business decisions made by unrelated facilities.

DER Item 11: Two other carbon adsorbers U-311 and U-215 appear to have been deleted from DWG. K3. The December 7 letter from Steve Taylor advised us the construction of the inorganic waste treatment processes will not be pursued. These two adsorbers are part of organic waste storage and are independent of the inorganic system, but they were also deleted without any explanation. Please provide an explanation. Pursuant to 403.722(3), F.S., we would like to see LESB continue to propose installing these carbon adsorbers. Flow diagram K3 should again reflect the proposed installation of these equipment. Design features, brochures, and inspection plans should also be provided.

Item 11 Response: These carbon adsorbers were proposed as part of the nitrogen blanketing system originally proposed. See Item 10 Response for explanation. Drawing K3 will be evaluated as part of the June 10, 1991 submission.

We trust that the information contained here and in the later submittal of engineering data on June 10, 1991, as authorized in your May 8, 1991, telephone conversation with Ashley Chadwick, will answer the Department's concerns sufficiently to allow processing of this application to continue. As always, should you have any questions, please contact either myself or Steve Taylor at (813)533-6111.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul W. Manak". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul Manak
Facility Manager

PWM/drs

cc: Steve Taylor
Ashley Chadwick
Dave Sprinkle
Barbara Hamilton

1212A



VIA CERTIFIED MAIL

June 10, 1991

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

D. E. R.
JUN 11 1991
SOUTHWEST DISTRICT
TAMPA

Re: Extension to Response Deadline
Laidlaw Environmental Services of Bartow, Inc.
EPA ID: FLD 980729610

Dear Mr. San Agustin:

In your absence (June 7, 1991), we informed Mr. Bill Crawford that the consultant retained to prepare certifications for process units at the facility will have such certifications available by the June 10, 1991, date agreed to by both parties. However, to provide ample in-house review prior to submission, it was agreed that an extension to June 17, 1991, would be acceptable. We appreciate your consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads "P. W. Manak". The signature is written in a cursive, flowing style.

Paul W. Manak
Facility Manager

PWM/drs

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

1327A

CERTIFIED - P 870 442 746
RETURN RECEIPT

D. E. R.

JUN - 6 1991

SOUTHWEST DISTRICT
TAMPA

May 31, 1991

Ms. Elizabeth Knauss, Permitting
Hazardous Waste Division
Florida Dept. of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

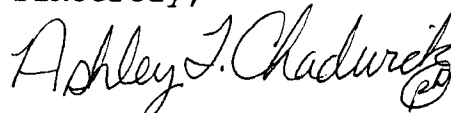
Re: Tricil Recovery Services, Inc. - Bartow, Florida
EPA ID# FLD 980 729 610

Dear Ms. Knauss:

Recently, I informed you that the draft construction permit from the Air Division (FDER) for process equipment has been received and once approved, operations will commence. From our conversation, you agreed that there would be no problem utilizing both process lines at that time since the Department would perceive that regulation of the process equipment is based on a change in interpretation. Be reminded, that our consultant is currently evaluating certification requirements for the process equipment.

Should you not agree with my understanding of our conversation, please contact me within seven (7) days of receipt so that your response closely correspond to the air permit.

Sincerely,



Ashley T. Chadwick
Southeast Regional
Environmental Manager

p.c. Steve Taylor
Paul Manak
John E. Deal, Jr.
Barbara Hamilton, Esquire

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 5/8 Subject Trail
Time 11:45 Permit No. _____
County Polk
M Ashley Oadwick Telephone No. 533-6111
Representing _____

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

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting re NOD

PE cert. Expires on ancillary equipment

- engine has been replaced

- will be on site 5/13 to give

cost estimate etc

- response is due then

- plan to respond to everything but

hank certifications by then but

won't know how long it will take

to get new certifications

until next week

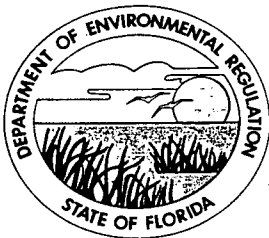
please call if there is a problem

June 10

(continue on another
sheet, if necessary)

Signature Beth

Title _____



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor 813-623-5561 FAX 813-272-2279 Carol M. Browner, Secretary

April 3, 1991

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

Re: Construction Permit Application, HC53-170970
Third Notice of Deficiency (NOD)

Dear Mr. Manak:

The Department acknowledges receipt of LESB response to our second NOD on February 8, 1991. Review of the revised application shows that it is still incomplete. This letter is to request for more additional information pursuant to Chapter 17-730, F.A.C. Additional information requested are as follows:

1. The response was indicated to be located on page 12-17 which appears to be a February 6, 1991 letter from R.O. Covington & Associates. The letter was not certified by Mr. Covington. It must be certified separately pursuant to §264.192(a).

The letter also states the P.E. assessment is only for tanks 151 through 156. Section 1.4.2 however indicates a sludge mix tank T-114 is going to be installed. The Department intends to permit T-114 as a tank regulated under §264 Subpart J. A P.E. assessment of T-114 and it's ancillary equipment must be provided pursuant to §264.192. A P.E. assessment of T-151 to 156's ancillary equipment must also be provided. Mr. Covington's assessment included only the 6 tanks and did not include their ancillary equipment.

Although Department staff are aware T-114 is non-existent based on previous inspections, Sections 1.4.2 and Page 1-102 fail to make a distinction that T-114 is not yet constructed. Furthermore, Page 1-102 appears to consider T-111, T-112 and T-114 as SWMU's. During a meeting held on February 8, 1991, LESB was provided a letter from EPA which supports the Department's determination that the blending tanks and ancillary equipment are regulated under §264 Subpart J. Page 1-102 must be revised to show these units as being tanks, not SWMU's. Furthermore, the narrative in Section 1.4.2 and Page 1-102 should reflect T-114 as being a proposed tank.

2. Item 3 states it is LESB's position that T-111, 112 and 114 are not regulated. Although the previous submittals include some information about these tanks, the Department would like LESB to include the specifications into the most recent submittals.

A telephone discussion with Steve Taylor on March 28 indicated that because the information was provided on a previous submittal, LESB does not need to provide them again. Department staff have no objections with this statement. Staff's objection is that LESB seems to expect DER staff to pull out the applicable pages from the previous submittal and then insert them into the appropriate pages. There are quite a considerable number of such pages to be removed and inserted. Department staff have more than enough professional work to act on. We expect LESB to perform this clerical exercise. We at the District Office have tried to consolidate our copy. You must consolidate the Tallahassee and Region IV copies and inform us as soon as you have done so.

3. Only the specifications for T-114 and its internal/external components were provided. Tank system information required under §264.192 includes ancillary equipment as defined in §260.10. We previously requested this type of information under item 3. of our November 9, 1990 NOD. The February 8 submittal provided only a general 9 line paragraph in Section 12.3.3. for ancillary equipment. Chapter 12, entitled Tank Design provided little information about ancillary equipment. Equipment specifications in Appendix I provided information only for its immediate adjacent parts.

Equipment associated with T-114 that should qualify as ancillary equipment and for which information was not provided include the following listed items. Drawing K2 was used to identify them.

- a. Stream No. 6 which includes piping connecting the inlet and outlet of T-114 with the storage tanks.
- b. Stream No. 8 which includes piping, solids grinder G-143, and an unnumbered pump.
- c. Solids conveyor and associated piping.
- d. Magnetic separator TK-142, basket filter K-144, pump P-146, and associated piping.
- e. An unnumbered vent fan and associated vent piping.
- f. Stream No. 7 which includes piping connecting pump P-126 and T-114.

The type of information requested regarding this matter includes as follows:

- a. A Florida P.E.'s assessment of the structural integrity of ancillary equipment (Section C.1. of the application).
 - b. Description of feed systems (describe each feed piping and waste being fed into T-114), all instrumentation (hi level alarms; temp/pressure gauges, etc.). What is the minimum heating value of the waste in each stream feeding T-114? (Section C.2. of the application)
 - c. Include a piping diagram. Flow diagrams in K2 do not describe piping size and materials of construction. (Section C.4. of application).
 - d. Manufacturer's brochures of ancillary equipment which are not piping; i.e., pumps, basket, filters, solids grinders, etc.
 - e. Indicate on DWG. K2 which RCRA regulated pieces of equipment are proposed to be installed.
4. Ancillary equipment information must also be provided for the T-151 thru T-156 tank system. Ancillary equipment referred to include piping, pumps, etc. connecting the T-151 to T-156 tanks with T-101 to T-110 tanks. DWG K3 does not show how waste is transferred from the proposed tanks to T-101 to T-110 or to the various distillation units. The type of information asked for include:
- a. A piping diagram showing how tanks T-151 to T-156 are connected to tanks T-101 to T-110. If any of T-151 to T-156 are connected to the distillation and other recycling units, this piping should also be shown.
 - b. In order to facilitate a RCRA inspector's inspection of RCRA regulated ancillary equipment, we request such regulated piping and equipment to given a color unique from non-RCRA waste ancillary equipment. Please propose a color so we can reflect it in the permit.
 - c. Size and material of construction of piping and other ancillary equipment.
 - d. Indicate on drawing K3 which RCRA regulated tanks and ancillary equipment are proposed to be installed.
 - e. Provide a detailed description of how ancillary equipment will be installed in compliance with §264.192(e).

5. Item 12. of the second NOD requested that all drawings in Appendix K must be certified by a professional engineer registered in Florida. Drawings K2 and K3 were not certified. Please have them certified.
6. The response to item 15. states none of the fuel blending equipment listed in item 15. of the second NOD are regulated under RCRA. These are basically equipment which are not classified as tanks or ancillary equipment but do come in contact with hazardous waste. These equipment would be regulated as miscellaneous units regulated under §264, Subpart X. Based on our review of the flow diagrams, the affected miscellaneous units may include but are not limited to the following:

- a. Shredder (G-123), Hopper (M-122), Inclined Tray (M-121) and Fan (C-131).

- b. Drum Scraping Machine (L-137) with Fan (C-132).

Since EPA and FDER have determined your fuel blending process does not meet the definition of a recycling process, LESB must provide any information required under Part I of the hazardous waste permit application form pertaining to the above mentioned units and other Subpart X units.

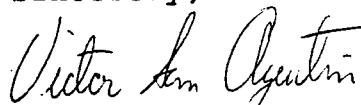
7. DWG K2 shows T-112 is not equipped with a vent fan whereas T-111, T-114, L-137, M-122, and M-121 are provided with vent fans. Please explain why T-112 does not need a vent fan.
8. We understand you are now the facility manager for LESB. Please provide certification pages showing your signature. Mr. Covington should recertify these new certification pages.
9. Item 29. states all SWMU's have been tabulated on page 1-102, but the tabulation does not include other waste recycling equipment such as the distillation units, freon wash tank, and other recycling units shown in Drawing K3. The tabulation in page 1-102 should be expanded to include all these waste recycling units. Maximum annual waste input rates for each recycling unit should be included as capacities.
10. Item 23. states LESB is deleting the N₂/CO₂ blanketing system. Furthermore, a comparison of the previous and the current K3 drawings shows the carbon absorber U-127 has also been deleted. No explanation was provided. Please provide an explanation. The N₂/CO₂ blanketing system and carbon absorber will significantly minimize organic compound releases into the environment. Although not required by a specific rule, applicants in our district who propose to install multiple flammable waste storage tanks have been providing additional

control measures to minimize organic compound releases. Pursuant to Section 403.722(3), Florida Statutes, the Department would like to see LESB propose similar control measures and provide a narrative regarding this matter in the Part B. Design features and brochures for whatever control measure is selected should also be provided. The inspection plan should also be revised to include inspections on the control device.

11. Two other carbon adsorbers U-311 and U-215 appear to have been deleted from DWG.K3. The December 7 letter from Steve Taylor advised us the construction of the inorganic waste treatment processes will not be pursued. These two adsorbers are part of organic waste storage and are independent of the inorganic system, but they were also deleted without any explanation. Please provide an explanation. Pursuant to 403.722(3), F.S., we would like to see LESB continue to propose installing these carbon adsorbers. Flow diagram K3 should again reflect the proposed installation of these equipment. Design features, brochures, and inspection plans should also be provided.

Further review of your application is temporarily held in abeyance pending receipt of your complete response to this letter. Please submit them no later than May 13, 1991. 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: Satish Kastury, BWP&R
James Scarbrough, USEPA IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

TRICK Rec Svs

HO53-086011

AT 2-f

D.E.R.

FEB 04 1991

4WD-RCRAFFB

FEB 7 1991

SOUTHWEST DISTRICT
TAMPA

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

Dear Mr. San Agustin:

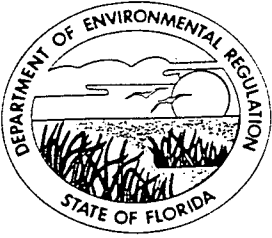
This letter is in response to your letter of December 19, 1990, requesting technical assistance on whether or not the fuel blending tanks at Laidlaw Environmental Services (LES) are exempt from applicable Resource Conservation and Recovery Act (RCRA) requirements pursuant to 40 CFR 261.6(c)(1).

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



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



D. E. R.

FEB 08 1991

SOUTHWEST DISTRICT
TAMPA

SOUTHWEST DISTRICT
TAMPA

February 4, 1991

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

Re: HC 53-170970, Construction Permit Application,
Response to Second Notice of Deficiency (NOD)

Dear Mr. San Agustin:

In response to your letter of November 9, 1990, we are submitting this letter and six revised copies of the referenced permit application. The permit application has been altered to a storage application and all references to the inorganic treatment system originally proposed have been deleted.

Direct response to the 30 points of concern stated in the November 9, 1990 letter are as follows:

Item 1. Pursuant to §270.16 and §264.192, the part B application must include a written assessment that is reviewed and certified by an independent, qualified professional engineer registered in Florida for each new tank system. These assessments were not provided with the part B application, so please provide them for all proposed tank systems to be regulated under RCRA. This includes ancillary equipment and secondary containment systems pursuant to §260.10.

Item 1. Response: This is provided in the permit application on page 12-17. Tanks T-100 through T-110, Table 12.1 (page 12-5) has been revised providing more information on the vent sizes and pressure relief settings. We decided to change these so that all T-100 series tanks have the same pressure relief settings (existing and new). See Attachment VI.

Item 2. Item 2.a. of the response indicates the maximum relief pressure of a 1 oz/in.² is for the manhole covers. For future reference, we would also like the relief pressure setting specified for the 3" vents, so please revise Table 12.1 accordingly. We also requested for UL-142 specifications. The response indicates a copy of UL-142 has been provided to the Department. Our records indicate Tricil provided us API 650, 6th Edition, April 1977. Please provide us the UL-142 specifications.

Be advised we want the specifications, not the book. We expect the applicant to provide the specifications. The Department feels it is not appropriate for LESB to have DER acquire UL-142 and take the time to determine the specifications for LESB.

Item 2. Response: Tanks T151-T156

Venting Atmospheric and Low-Pressure Storage Tanks

Nonrefrigerated
API Standard 2000
Third Edition, January 82

The normal breather vent will be a 4" nozzle fitted with a combination vent flame arrester. The relief pressure setting will be 1/2 oz. per sq. inch. The vent will begin to open when the tank internal pressure due to pumping and thermal outbreathing reaches 1/2 oz. per sq. inch. The vents are designed for 100% overpressure to attain a full open position. This means the vent would be fully open when the internal pressure reaches 1 oz. per sq. inch. The flow through the vent would increase from approximately 7000 standard cubic feet per hour to 8500 standard cubic feet per hour. The vacuum relief setting would also be 1/2 oz. per sq. inch. See Attachment I.

These settings and nozzle sizes are based on API Standard 2000 Third Edition, January 82. See Attachment II.

Calculations

NORMAL VENTING

OUTBREATHING/PRESSURE

$$\text{Cu. ft. per hour} = \frac{\text{GPM} \times 60}{7.5} + \text{TPB}$$

TPB = Thermal Outbreathing (pg. TS5 - Attachment II)

TPB = 286 cu. ft. per hour

$$\text{Cu. ft. per hour} = \frac{200\text{GPM} \times 60}{7.5} + 286 = 3715$$

INBREATHING/VACUUM

$$\text{Cu. ft. per hour} = \frac{\text{GPM} \times 60}{7.5} + \text{TV}$$

TV = Thermal Inbreathing (pg. TS5 - Attachment II)

TVC = 286 CFH

$$\text{Cu. ft. per hour} = \frac{200\text{GPM} \times 60}{7.5} = 1886$$

EMERGENCY RELIEF VENTING

Cu. ft. of free air per hour =

$$V = \frac{1337}{L\sqrt{M}} \sqrt{\frac{T}{520}}$$

V = 415,040 (pg. TS6 Table 2 Attachment II)

$$\begin{aligned} \text{Cu. ft. of free air per hour} &= 415,040 \frac{1337}{1337} \sqrt{\frac{555}{520}} \\ &= 428,780 \text{ cu. ft. per hour of free air} \end{aligned}$$

The manway is 20" in diameter and will be used for emergency venting. The manway vent relief pressure setting will be 1 1/2 oz. per sq. inch.

Since most materials stored in these tanks will have a vapor density heavier than air, a correction for flow will be computed. Assume a vapor density of 3 times heavier than air.

$$\begin{aligned} \text{Actual flow rate} &= \frac{428,780 \text{ cu.ft.per hour}}{\sqrt{3.0}} \\ &= 334,863 \text{ cu. ft. per hour} \end{aligned}$$

The tank is designed to operate at pressures between 0 psig and 0.5 psig. Therefore the 20" manway will be more than adequate for emergency venting. See Attachment III.

Item 3. Items 2.b. and 2.f. of the response and page I-34 indicate fuel blending tanks T-111, T-112 and T-114 are not relevant to this RCRA storage permit application. Be advised this application is for storage and treatment which you even indicated in page G-2.

The Department intends to regulate these units as tank systems as defined in §260.10. As such, we request any additional information required by §270.16 and §264.192 should be provided in the part B for these tank systems. Be advised similar information is required for pumps, piping, or any equipment meeting the definition of ancillary equipment.

Item 3. Response: It is and has been our position that these tanks are not regulated. The treatment referred to inorganic treatment which has now been deleted.

Item 4. Other units which the Department believes should be regulated as tank systems as defined in §260.10 are a drip tray and sump as described in drawing K-4 entitled, "Inorganic Waste Treatment Process Flow Diagram". We also believe the 2 unlabelled tanks in Fig. 12.4 should be regulated under RCRA. Since §260.10 includes ancillary equipment, the RCRA waste handling pumps and associated piping will also be regulated.

Furthermore, Section 1.7.2 indicates the inorganic waste filtration system includes two polymer mix units. Since the part B provides little information about these units, we believe they should be regulated as tank systems.

Any information required by §270.16 and §264.192 should be provided in the part B application for the above mentioned units. We recommend you list all of the regulated tanks and ancillary units in one or more tables.

Item 4. Response: Deleted.

Item 5. Item 2.g. of the response indicates the Department should review API 650, Section 3 to obtain wall thickness. Review of the section shows a variety of topics, shell design being one of them. Review of this subsection shows various equations for obtaining wall thickness. Be advised we expect you, not DER to perform these calculations and determine the thickness. They are not specified as indicated in the September 5 letter. Please specify them.

Item 5. Response: Tanks T151-T156 will be designed in accordance with API 650, Seventh Edition 1980 Welded Steel Tanks for Oil Storage and UL142, 4th Edition, December 21, 1972. See Attachments IV and V.

LESB design sheets have been revised to show the design code, wall thickness, and relief valve setting, Attachment IV. Tank manufacturers will be required to demonstrate compliance with the codes and final design specifications for each tank at LESB.

Item 6. The response to 2.1 again refers us to API 650, Section 3. The section however, again shows a variety of recommended seams. The Department expects you to specify these seam standards.

Item 6. Response: Again, LESB has revised the design specification sheet to indicate seam standards, materials of construction and so forth. The seam specification is per API Specification for Small Welded Production Tank, Standard 12F, Eighth Edition, 1982.

Item 7. The Department agrees that intermediate tanks T-201 to T-214 are not regulated under RCRA since they will not be receiving RCRA wastes. As such, the following requests for additional information pertain only to tanks R-202 and R-203.

- a. Same as 5. above. Please specify the wall thickness.
- b. Item 2.1. of the response again referred us to API 650. Please provide the tank standards.
- c. Item 2.n. of the response again referred us back to API 650. Again, we expect you to provide the seam specifications in the Part B.

- d. Item 2.o. of the response again refers us to UL 142. Again we expect you to provide responses to items i) to vii).

Furthermore, the response to viii) indicates the tank will operate at a vacuum after the hot material cools. Will the tanks ever operate above atmospheric? If so, we would like to know the maximum pressure and the pressure relief specifications.

Item 7. Response: R202-R203

- (a) These tanks are designed per ASME VIII Code for Unified Pressure Vessels. The specification sheets have been revised to indicate shell thickness. See Attachment V.
- (b) Seam specifications are per ASME Section IX.
- (c) Same as (b) above.
- (d) R202 and R203 are designed with a jacket for heating, however LESB does not intend to heat material in these vessels. LESB intends to use this tank as an atmospheric tank. Tank design code is ASME VIII, Division 1, Pressure Vessels 1986.

A vacuum is pulled on the discharge side of the bottoms pump to reduce wear on the pump. LESB does not plan to use the vessel for heating.

Item 8. The following questions apply to acid waste tanks T-801 to T-803. This item applies to the response to 2.s referred us to pages I-30 to I-33. 2.s requested for scrubber specs for fume control of acid waste tanks. The scrubber specifications in pages I-30 to I-33 indicate each tank will have a fume adsorber. Each is to be designated as U127, U215, and U311. The specifications also indicate each will be a carbon bed adsorber containing 2000 lbs. of carbon. Based on our review of other acidic waste treatment operations, scrubbers normally used are caustic (NaOH) scrubbers. Carbon adsorbers are normally used to adsorb volatile organic compounds, not acid fumes. Please explain why LESB feels a carbon adsorber should be sufficient for acid fume control.

Item 8. Response: Deleted.

Item 9. This request pertains to alkaline waste tanks T-811 to T-813. The tank specification sheets in I-18 to I-21 indicate each tank will have an individual scrubber. The sheets however, do not specify the type of scrubber. It indicates information about the scrubber will be provided by the supplier. The scrubber specifications are needed for the purpose of satisfying this NOD item.

The September 5 letter, which referred us back to pages I-30 to I-33, however indicates the scrubber specifications will be similar to U127, U215, and U311, which leads us to believe carbon absorbers can effectively absorb fumes from alkaline waste tanks. Based on our knowledge of other alkaline waste treatment operations caustic scrubbers are normally used. Please explain how these adsorbers can effectively control fumes from alkaline wash tanks.

Item 9. Response: Deleted.

Item 10. This request pertains to neutralization reactors T-851 and T-852. Item 2.z. of the response indicates carbon adsorbers will also be used. Elementary neutralization operations are normally vented to a caustic scrubber. Please explain how your adsorbers can effectively control inorganic fumes from the reactors.

Item 10. Response: Deleted.

Item 11. Item 3 of the response indicates the sludge dryer has been deleted. Section 1.7.2, page 107 however, indicates a sludge dryer will be used to remove residual water from the filter cake. Please revise Section 1.7.2 to also delete the sludge dryer.

Item 11. Response: Deleted.

Item 12. Item 5 of the response indicates there may be several scrubbers, even if drawing K-4 shows there will be one scrubber designated as U-860 which the drawing shows as a 112 ft. high, 2.5 ft, diameter scrubber. The Department feels that process flow diagrams should reflect both material flow and equipment. In fact, the total number of tanks are reflected in the drawing. Why not do the same for the scrubbers? Dwg. K-4 must be advised to reflect the actual number of scrubbers. All drawings in Appendix K must be certified by a professional engineer registered in Florida.

Item 12. Response: Deleted.

Item 13. The inspection checklist indicates all scrubbers will be inspected for unacceptable pressure drop, integrity and odor. The acceptable pH and pressure drop ranges should be included in the checklist.

Item 13. Response: Deleted.

Item 14. Item 7 of the response indicates carbon adsorption systems are not included in this application. Drawing K3 however, shows 3 carbon adsorbers U-127, 215 and 311. If these will be installed, the information requested in item 7 of the 1st NOD must be provided.

Item 14. Respose: Deleted.

Item 15. Page G21 of the application indicated the facility neither has nor will have miscellaneous units. Some of the equipment specified in the application appear to meet the definition as stated in §260.10. These units are listed below. The Department believes they should be specified in the part B permit as miscellaneous units.

Fuel Blending Area

Inorganic Treatment Area

- a. Shredder with Hopper (G-123, M-122)
- b. Magnetic Separators (K-124, 142, 115)
- c. Solids Grinder (G-143, 146)
- d. Drum Scraping Machine (L0137)
- e. Basket Filters (K-103, 105, 125)
- f. Solids Extrusion Conveyor

- a. Filter Press (K-877)

Any information required under parts O and I of the application must be provided for the above miscellaneous units. In addition, the information required under 40CFR264.601(c) must be provided for the above units. Item 15 of the response referred us to the air permits. Be advised the information provided in the air permits address only VOC emissions and not toxic emissions which we are requesting under §264.601(c)(1) to (6). These miscellaneous units should also be included under Section 1.10 entitled, "Facility Capacity".

Item 15. Response: It is and has been our position that the fuel blending equipment listed are not regulated. The filter press (K-877) has been deleted. We do not believe that the fuel blending equipment treats, stores, or disposes of waste, and as a recycling process is not subject to RCRA permitting requirements.

Item 16. Chart No. 1 entitled, "Solvent Recovery Process" in page I-94 indicates sludges and still bottoms from the solvent recovery processes are transferred to the fuel blending area. Please specify the heating value ranges of each sludge waste stream and each still bottom waste stream going to tanks R-202 and R-203. Procedures and criteria for accepting still bottom wastes with acceptable heating values shall be described in the Waste Analysis Plan.

Item 16. Response: Still bottom wastes collected in R-202 and R-203 will be required to have a minimum heating value of 5000 BTU/lb. in order to be used as fuels. Still bottoms cannot be analyzed for BTU value upon receipt since they are process-created. However, BTU value will be determined on the material in R-202 and R-203 prior to each material transfer from these tanks. If the BTU value is less than 5000 BTU/lb. then the contents of the tank will be shipped to and disposed of at an RCRA incinerator. Pages 4-6 and 4-9 in the Waste Analysis Plan have been modified to reflect this.

Item 17. Section 1.3.3 refers to removal of contents for solvent recovery only by using a spark proof wand connected to a flexible hose. Past inspections have shown forklifts are used to unload the drum and the contents are splash loaded into T-111, T-112, and T-114. If you plan to use the latter unloading method for solvent recovery, Section 1.3.3 must be revised to reflect the latter type of unloading. Also, please explain the conditions which force LESB to utilize the latter types of loading. Section 1.4.4 should also be revised to include criteria for using the drum/forklift method versus using the spark proof wand for removing drum contents.

Item 17. Response: Drums containing solvent to be recovered are not dumped into T-111, T-112 and T-114. These drums are pumped using a spark proof wand. Only fuel sludges are dumped into the aforementioned tanks. Pages 1-97 and 1-98 have been altered to reflect this more clearly.

Item 18. Section 1.5.3 indicated drums containing alkaline and acidic wastes will be transferred to the appropriate tanks or tank trucks via a spark proof wand and flexible hose connected to overhead piping. Review of the facility layouts like Fig. 9.3 indicate the acid/alkaline container storage area and the acid/alkaline tanks are located on opposite sections of the plant and that there is no overhead piping connecting the storage tanks to the drum storage building. There seems to be overhead piping connecting the tanks in question to the North Treatment Area. Are you planning to have container storage here? If so, there appears to be not space available. Please explain in detail in Section 1.5 and Section 11.5 as to how the drum contents will be transferred to the storage tanks. We would also like to see a commitment prohibiting drum storage at any of the process pads.

Item 18. Response: Deleted.

Item 19. The Department expressed the same concern as in 19. above for metal bearing wastes. Please provide an explanation in Section 1.b.3. and Section 11.5.

Item 19. Response: Deleted.

Item 20. Section 11 should also address the management of empty containers. Do you have a designated spot for storing them when a tractor trailer is not available? Section 1.2.4 indicates empty drums will be loaded on a tractor trailer. Please address the intermingling of incompatible empty drums in the trailer. Furthermore, the same section mentions contents from non-empty drums are emptied, or poured or scraped into open head accumulation drums. Please designate locations for these accumulation drums. The open head drums should be closed when not in use pursuant to §264.173 so the second to the last sentence in page I-92 should be reworded accordingly.

Item 20. Response: The permit application has been modified to indicate how we will handle empty containers created by the accumulation of potential incompatibles. We will not accumulate reactive waste and we will stabilize corrosive residues with portland cement and accumulate the residues prior to storage and disposal of the empty containers. Page 1-96 has been revised to reflect this. Otherwise, RCRA empty drums are not regulated and storage will be conducted as necessary. Satellite accumulation drum locations are described in pages I-91 and I-94. Page I-92 has been reworded as requested to refer to 17H or 17E rather than open-head which was a phrase used to describe the drum type, rather than the condition and to indicate that all accumulation drums will be handled pursuant to 264.173.

Item 21. The North Treatment Area has a designated spot for storing roll-off boxes. These containers will store filter cake. The Department believes these boxes should be regulated under RCRA as containers. Any information required under Part II, Section B of the applicaiton form must be provided as they pertain to the roll-off boxes.

Item 21. Response: Deleted.

Item 22. DWG. K-4 indicates there will be bulk loading of wastes at the acid/alkaline waste area and at the north treatment area. Any information required by part II, Section B or C of the form pertaining to secondary containment should be provided. The Department believes there should be separate containment sections for these waste loading/unloading areas. Please describe the secondary containment provisions for these areas.

Item 22. Response: Deleted.

Item 23. The daily or weekly tanks inspection checklist should be revised to include a check for unplanned air releases on top of the waste tanks and a check on the N₂/CO₂ blanketing system effectiveness.

Item 23. Response: Air releases from storage tanks result from working and breathing and are permitted under air permit # A053-128774. Since emissions are more or less continuous, and sudden releases are extremely unlikely, a checklist would serve no useful purpose. We are deleting the N₂/CO₂ blanketing system.

Item 24. An inspection checklist/s for miscellaneous units should be added to Chapter 6 pursuant to §264.15 and Part II, Section I of the permit application. The narration in Chapter 6 should be revised accordingly.

Item 24. Response: It is and has been our position that we have no miscellaneous units.

Item 25. A daily inspection checklist should be provided for carbon absorbers U-127, U-125, and U-131. The narrations in Chapter 6 should be revised accordingly.

Item 25. Response: Deleted.

Item 26. An inspection checklist should be provided for the roll-off boxes or any other containers located at the North Treatment Area pursuant to §264.174 and §264.15. The narration in Chapter 6 should be revised accordingly.

Item 26. Response: Deleted.

Item 27. The Generator's Waste Material Profile Sheet (Fig. 4.1) shows metal bearing wastes should be analyzed for Total Metals by using the EP Toxicity test. Page 4-1 also indicates the Toxicity Characteristic Certification form (Fig. 4.2) would be submitted only if necessary. Under what conditions will it be necessary to complete Fig. 4.2? Please explain the criteria. Also, the EP Toxicity reference should be removed now that TCLP has replaced it.

Item 27. Response: The Toxicity Characteristic Certificate Form is required of all waste streams in conjunction with the Waste Material Profile Sheet. Page 4-1 has been modified to reflect that. The EP Toxicity reference has been eliminated.

Item 28. Section 4.3.2 indicates one appropriate representative sample of the waste in the truck will be obtained. Some truckloads contain wastes in which the physical composition is non-homogeneous, i.e., the metals congregate in the bottom of the tank truck or waste densities vary at the bottom, middle and top layer in the tank truck. For tank trucks containing non-homogeneous wastes, please explain how you should obtain a representative sample.

Item 28. Response: Tank trucks are sampled using a sampler coliwasa which will obtain a representative core sample. Section 4.3.2, page 4-5 has been modified to indicate this.

Item 29. Page G21 of the application shows that SWMU's existing at the facility are storage tanks and waste recycling operations. Furthermore, page G22 indicated all SWMU's are described in the Part B. Review of the part B shows many equipment descriptions, but none of the descriptions identify the affected equipment at SWMU's. Any information required by item 2 in page G22 must be provided. We would like to see the SWMU descriptions, capacities, dimensions, and locations tabulated.

Item 29. Response: All SWMU's have been tabulated on page 1-102.

Item 30. Items 3 and 5, page G22 of the application indicates there are no releases from any SWMU's. Be advised, release information being asked for includes releases into the atmosphere. Any information required by items 3 and 4 must be provided.

Item 30. Response: We have revised Appendix G to include air emissions information from storage tanks and process equipment.

If you have any questions, don't hesitate to call me at (813) 533-6111.

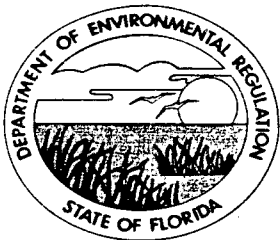
Sincerely,

A handwritten signature in black ink, appearing to read "Michael Sanderock", written in a cursive style.

Michael Sanderock
Facility Manager

cc: Ashley Chadwick
Steve Taylor
Dave Sprinkle
Barbara Hamilton

MS/drs
0884A



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor 813-623-5561, FAX 813-272-2279 Carol M. Browner, Secretary

March 15, 1991

Mr. Michael Sanderock
Facility Manager
TRICIL RECOVERY SERVICES, INC.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: Construction/modification application
to handle benzene in the tank farm.
DER File #AC53-192708

Dear Mr. Sanderock:

The Department reviewed the above referenced "modification" application. The Department is pleased to see that Tricil is planning changes to decrease VOC emissions to the atmosphere, including the installation of vapor balancing.

In order to process this application, the Department will need some additional information. The following additional information is requested pursuant to Rules 17-4.055, 17-4.070, 17-2.620(1), 17-2.620(2), 17-2.660, and 17-2.670, F.A.C., 40 CFR 60 Subpart VV, 40 CFR 61 Subpart J, 40 CFR 61 Subpart V, 40 CFR 61 Subpart Y, 40 CFR 61 Subpart BB, 40 CFR 61 Subpart FF, 40 CFR Parts 264 and 265.

Tricil is hereby reminded that additional information of an engineering nature submitted to the Department must be signed and sealed by a professional engineer registered in Florida.

- (1) Please submit a copy of the application with an original signature on it.
- (2) What is the requested (permitted maximum) annual (a) loading, (b) unloading, and (c) tank to tank transfer rates for benzene?
- (3) What is the expected average weight per month of benzene (a) loading, (b) unloading, and (c) tank to tank transfers?
- (4) What is the maximum weight percent benzene to be handled?
- (5) Will there be any instances where water and benzene will be in contact with each other?
- (6) Please describe Tricil's proposed method of operating the vapor balancing for each VOC transfer.

(7) What are the emission estimates, in pounds per hour, and in tons per year, of both "general VOC" and benzene? Please include calculations in sufficient detail to permit assessment of the validity of the calculations.

(8) Please identify, by point ID number, each point where benzene emissions can reasonably be expected to occur.

(9) What is the estimated control efficiency for vapor balancing?

(10) Are the emissions from any of the following process unit operations vented through any of the tank vents?

- (a) Steam strippers
- (b) Distillation
- (c) Fractionation
- (d) Thin-film evaporation
- (e) Solvent extraction
- (f) Air strippers

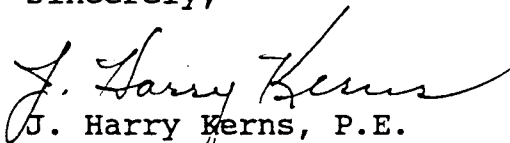
If the answer to any of the above is yes, then what are the individual and sum total pounds per hour and tons per year of VOC emissions associated with venting the unit operations through the tank vents?

NOTICE!

Pursuant to Section 120.60, F.S., and Rule 17-4.070(2), F.A.C., if the Department does not receive satisfactory responses to this request for additional information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available.

Pursuant to Section 120.60, F.S., the Department suspends the processing of your permit until receipt of the requested additional information. If you have any questions, please call Mr. Gary A. Maier at (813) 623-5561 ext. 412.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer

copy to: Tom T. John, P.E.



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: Victor San Agustin, P.E. ^{VSA}
DATE: February 11, 1991
SUBJECT: Letter of Transmittal **HC53-170970**

Enclosed for your records is one copy of Laidlaw Environmental Services of Bartow's Revised Part B permit application. The initial part B was submitted 10/26/89. This submittal is the second revision. *This should not be confused with LESB permit renewal application H053-182726.*

I have already forwarded another copy to USEPA IV. Any questions, please call me at (813) 623-5561, ext. 390.

VSA/ab
Enclosure

cc: Jim Scarbrough, EPA IV



December 7, 1990

D. E. R.

DEC 10 1990

SOUTHWEST DISTRICT
TAMPA

Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Re: HC53-170970, Response to Notice of Deficiency

Dear Mr. San Agustin;

This letter is to advise you that a corporate decision has been made not to pursue the construction of the inorganic waste treatment process as described in the referenced permit application. Due to the deletion of the inorganic treatment and storage equipment, the application will be heavily edited and may be somewhat smaller when the revised version is submitted in answer to the NOD.

Sincerely,

A handwritten signature in cursive script that reads "Steve Taylor". The signature is written in dark ink and is positioned above the printed name and title.

Steve Taylor
Safety and Compliance Manager

ST/drs
0704A



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

DATE: September 13, 1990
TO: Satish Kastury
FROM: Victor San Agustin ^{VSA}
RE: HC53-170970, Tricil Recovery Services
Response to First NOD

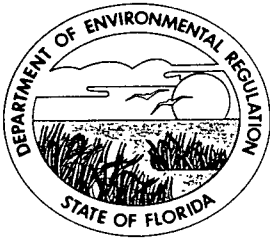
Enclosed are two sets of copies of their response to our first NOD.

The response requests that certain pages and Appendices be replaced. Please replace the affected pages as instructed in their cover letter. Our office has already replaced our copies.

If you have any questions, please call.

VSA/jc

Enclosures



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

November 16, 1990

Merle Bishop, Director
Polk County Department of
Development Coordination
Planning Division
Post Office Box 1969
Bartow, Florida 33830

Re: Receipt of Permit Application
Laidlaw Environmental Services of Bartow

Dear Mr. Bishop:

As you requested, this letter is to inform you the Department received a revised hazardous waste permit application to construct additional hazardous waste operations at the above referenced facility located at the Bartow Municipal Airport. The revised application was received on September 7, 1990. The original application was received on October 26, 1989.

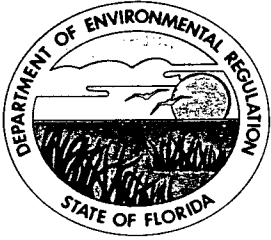
The current status is that the revised application is found to be incomplete and the Department is currently in the process of requesting more additional information from the applicant. As requested, enclosed is a copy of their cover letter submittal. The application is available for public inspection at the Tampa FDER office during regular business hours (8:00 a.m. to 5:00 p.m.).

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



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

NOV 9 1990

Mr. Michael Sanderock
Facility Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830

RE: HC53-170970, Construction Permit Application
Second Notice of Deficiency (NOD)

Dear Mr. Sanderock:

The Department acknowledges receipt of a September 5, 1990 letter from Steve Taylor and the 6 revised copies of the Part B application on September 7, 1990. Review of the submittals shows that the application is incomplete. This letter is to request for more additional information pursuant to Chapter 17-730, F.A.C. Additional information requested are as follows.

TANKS

1. Pursuant to §270.16 and §264.192, the part B application must include a written assessment that is reviewed and certified by an independent, qualified professional engineer registered in Florida for each new tank system. These assessments were not provided with the part B application, so please provide them for all proposed tank systems to be regulated under RCRA. This includes ancillary equipment and secondary containment systems pursuant to §260.10.
2. Item 2.a. of the response indicates the maximum relief pressure of 1 oz/in² is for the manhole covers. For future reference, we would also like the relief pressure setting specified for the 3" vents, so please revise Table 12.1 accordingly. We also requested for UL-142 specifications. The response indicates a copy of UL-142 has been provided to the Department. Our records indicate Tricil provided us API 650, 6th edition, April 1977. Please provide us the UL-142 specifications.



Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 2

Be advised we want the specifications, not the book. We expect the applicant to provide the specifications. The Department feels it is not appropriate for LESB to have DER acquire UL-142 and take the time to determine the specifications for LESB.

3. Items 2.b. and 2.f. of the response and page I-34 indicate fuel blending tanks T-111, T-112 and T-114 are not relevant to this RCRA storage permit application. Be advised this application is for storage and treatment which you even indicated in page G-2.

The Department intends to regulate these units as tank systems as defined in §260.10. As such, we request any additional information required by §270.16 and §264.192 should be provided in the part B for these tank systems. Be advised similar information is required for pumps, piping, or any equipment meeting the definition of ancillary equipment.

4. Other units which the Department believes should be regulated as tank systems as defined in §260.10 are a drip tray and sump as described in drawing K-4 entitled, "Inorganic Waste Treatment Process Flow Diagram". We also believe the 2 unlabelled tanks in Fig. 12.4 should be regulated under RCRA. Since §260.10 includes ancillary equipment, the RCRA waste handling pumps and associated piping will also be regulated.

Furthermore, Section 1.7.2 indicates the inorganic waste filtration system includes two polymer mix units. Since the part B provides little information about these units, we believe they should be regulated as tank systems.

Any information required by §270.16 and §264.192 should be provided in the part B application for the above mentioned units. We recommend you list all of the regulated tanks and ancillary units in one or more tables.

5. Item 2.g. of the response indicates the Department should review API 650, Section 3 to obtain wall thickness. Review of the section shows a variety of topics, shall design being one of them. Review of this subsection shows various equations for obtaining wall thickness. Be advised we expect you, not DER to perform these calculations and determine the thickness. They are not specified as indicated in the September 5 letter. Please specify them.
6. The response to 2.1 again refers us to API 650, Section 3. The section however, again shows a variety of recommended seams. The Department expects you to specify these seam standards.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 3

7. The Department agrees that intermediate tanks T-211 to T0214 are not regulated under RCRA since they will not be receiving RCRA wastes. As such, the following requests for additional information pertain only to tanks R-202 and R-203.
 - a. Same as 5. above. Please specify the wall thickness.
 - b. Item 2.1. of the response again referred us to API 650. Please provide the tank standards.
 - c. Item 2.n. of the response again referred us back to API 650. Again, we expect you to provide the seam specifications in the Part B.
 - d. Item 2.o. of the response again refers us to UL 142. Again we expect you to provide responses to items i) to vii).

Furthermore, the response to viii) indicates the tank will operate at a vacuum after the hot material cools. Will the tanks ever operate above atmospheric? If so, we would like to know the maximum pressure and the pressure relief specifications.

8. The following questions apply to acid waste tanks T-801 to T-803. This item applies to the response to 2.s referred us to pages I-30 to I-33. 2.s requested for scrubber specs for fume control of acid waste tanks. The scrubber specifications in pages I-30 to I-33 indicate each tank will have a fume adsorber. Each is to be designated as U127, U215, and U311. The specifications also indicate each will be a carbon bed adsorber containing 2000 lbs of carbon. Based on our review of other acidic waste treatment operations, scrubbers normally used are caustic (NaOH) scrubbers. Carbon adsorbers are normally used to adsorb volatile organic compounds, not acid fumes. Please explain why LESB feels a carbon absorber should be sufficient for acid fume control.
9. This request pertains to alkaline waste tanks T-811 to T-813. The tank specification sheets in I-18 to I-21 indicate each tank will have an individual scrubber. The sheets however, do not specify the type of scrubber. It indicates information about the scrubber will be provided by the supplier. The scrubber specifications are needed for the purpose of satisfying this NOD item.

The September 5 letter, which referred us back to pages I-30 to I-33, however indicates the scrubber specifications will be similar to U127, U215, and U311, which leads us to believe carbon absorbers can effectively absorb fumes from alkaline waste tanks. Based on our knowledge of other alkaline waste treatment operations caustic scrubbers are normally used. Please explain how these adsorbers can effectively control fumes from alkaline wash tanks.

10. This request pertains to neutralization reactors T-851 and T-852. Item 2.z. of the response indicates carbon adsorbers will also be used. Elementary neutralization operations are normally vented to a caustic scrubber. Please explain how your adsorbers can effectively control inorganic fumes from the reactors.
11. Item 3 of the response indicates the sludge dryer has been deleted. Section 1.7.2, page 107 however, indicates a sludge dryer will be used to remove residual water from the filter cake. Please revise Section 1.7.2 to also delete the sludge dryer.
12. Item 5 of the response indicates there may be several scrubbers, even if drawing K-4 shows there will be one scrubber designated as U-860 which the drawing shows as a 112 ft. high, 2.5 ft. diameter scrubber. The Department feels that process flow diagrams should reflect both material flow and equipment. In fact, the total number of tanks are reflected in the drawing. Why not do the same for the scrubbers? Dwg. K-4 must be advised to reflect the actual number of scrubbers. All drawings in Appendix K must be certified by a professional engineer registered in Florida.
13. The inspection checklist indicates all scrubbers will be inspected for unacceptable pressure drop, integrity and odor. The acceptable pH and pressure drop ranges should be included in the checklist.
14. Item 7 of the response indicates carbon adsorption systems are not included in this application. Drawing K3 however, shows 3 carbon adsorbers U-127, 215 and 311. If these will be installed, the information requested in item 7 of the 1st NOD must be provided.

MISCELLANEOUS UNITS

15. Page G21 of the application indicates the facility neither has nor will have miscellaneous units. Some of the equipment specified in the applicator appear to meet the definition as stated in §260.10. These units are listed below. The Department believes they should be specified in the part B permit as miscellaneous units.

Fuel Blending Area

- a. Shredder with Hopper (G-123, M-122)
- b. Magnetic Separators (K-124, 142, 115)
- c. Solids Grinder (G-143, 146)
- d. Drum Scraping Machine (L0137)
- e. Basket Filters (K-103, 105, 125)
- f. Solids Extrusion Conveyor

Inorganic Treatment Area

- a. Filter Press (K-877)

Any information required under parts O and I of the application must be provided for the above miscellaneous units. In addition, information required under 40CFR264.601(c) must be provided for the above units. Item 15 of the response referred us to the air permits. Be advised the information provided in the air permits address only VOC emissions and not toxic emissions which we are requesting under §264.601(c)(1) to (6). These miscellaneous units should also be included under Section 1.10 entitled, "Facility Capacity".

- 16. Chart No. 1 entitled, "Solvent Recovery Process" in page I-94 indicates sludges and still bottoms from the solvent recovery processes are transferred to the fuel blending area. Please specify the heating value ranges of each sludge waste stream and each still bottom waste stream going to tanks R-202 and R-203. Procedures and criteria for accepting still bottom wastes with acceptable heating values shall be described in the Waste Analysis Plan.

CONTAINERS

- 17. Section 1.3.3 refers to removal of contents for solvent recovery only by using a spark proof wand connected to a flexible hose. Past inspections have shown forklifts are used to unload the drum and the contents are splash loaded into T-111, T-112, and T-114. If you plan to use the latter unloading method for solvent recovery, Section 1.3.3 must be revised to reflect the latter type of unloading. Also, please explain the conditions which force LESB to utilize the latter types of loading. Section 1.4.4. should also be revised to include criteria for using the drum/forklift method versus using the spark proof wand for removing drum contents.
- 18. Section 1.5.3 indicates drums containing alkaline and acidic wastes will be transferred to the appropriate tanks or tank trucks via a spark proof wand and flexible hose connected to overhead piping. Review of the facility layouts like Fig. 9.3 indicate the acid/alkaline container storage area and the acid/alkaline tanks are located on opposite sections of the plant and that there is no overhead piping connecting the storage tanks to the drum storage building. There seems to be overhead piping connecting the tanks in question to the North Treatment Area. Are you planning to have container storage here? If so, there appears to be no space available. Please explain in detail in Section 1.5 and

Section 11.5 as to how the drum contents will be transferred to the storage tanks. We would also like to see a commitment prohibiting drum storage at any of the process pads.

19. The Department expressed the same concern as in 19. above for metal bearing wastes. Please provide an explanation in Section 1.b.3. and Section 11.5.
20. Section 11 should also address the management of empty containers. Do you have a designated spot for storing them when a tractor trailer is not available? Section 1.2.4 indicates empty drums will be loaded on a tractor trailer. Please address the intermingling of incompatible empty drums in the trailer. Furthermore, the same section mentions contents from non-empty drums are emptied, or poured or scraped into open head accumulation drums. Please designate locations for these accumulation drums. The open head drums should be closed when not in use pursuant to §264.173 so the second to the last sentence in page I-92 should be reworded accordingly.
21. The North Treatment Area has a designated spot for storing roll-off boxes. These containers will store filter cake. The Department believes these boxes should be regulated under RCRA as containers. Any information required under Part II, Section B of the application form must be provided as they pertain to the roll-off boxes.
22. DWG. K-4 indicates there will be bulk loading of wastes at the acid/alkaline waste area and at the north treatment area. Any information required by part II, Section B or C of the form pertaining to secondary containment should be provided. The Department believes there should be separate containment sections for these waste loading/unloading areas. Please describe the secondary containment provisions for these areas.

INSPECTIONS

23. The daily or weekly tanks inspection checklist should be revised to include a check for unplanned air releases on top of the waste tanks and a check on the N₂/CO₂ blanketing system effectiveness.
24. An inspection checklist/s for miscellaneous units should be added to Chapter 6 pursuant to §264.15 and Part II, Section I of the permit application. The narration in Chapter 6 should be revised accordingly.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 7

25. A daily inspection checklist should be provided for carbon absorbers U-127, U-215, and U-311. The narrations in Chapter 6 should be revised accordingly.
26. An inspection checklist should be provided for the roll-off boxes or any other containers located at the North Treatment Area pursuant to §264.174 and §264.15, The narration in Chapter 6 should be revised accordingly.

WASTE ANALYSIS PLAN

27. The Generator's Waste Material Profile Sheet (Fig. 4.1) shows metal bearing wastes should be analyzed for Total Metals by using the EP Toxicity test. Page 4-1 also indicates the Toxicity Characteristic Certification form (Fig. 4.2) would be submitted only if necessary. Under what conditions will it be necessary to complete Fig. 4.2 Please explain the criteria. Also, the EP Toxicity reference should be removed now that TCLP has replaced it.
28. Section 4.3.2 indicates one appropriate representative sample of the waste in the truck will be obtained. Some truckloads contain wastes in which the physical composition is non-homogeneous, i.e., the metals congregate in the bottom of the tank truck or waste densities vary at the bottom, middle and top layer in the tank truck. For tank trucks containing non-homogeneous wastes, please explain how you should obtain a representative sample.

SWMU's

29. Page G21 of the application shows that SWMU's existing at the facility are storage tanks and waste recycling operations. Furthermore, page G22 indicates all SWMU's are described in the Part B. Review of the part B shows many equipment descriptions, but none of the descriptions identify the affected equipment as SWMU's. Any information required by item 2 in page G22 must be provided. We would like to see the SWMU descriptions, capacities, dimensions, and locations tabulated.
30. Items 3 and 5, page G22 of the application indicates there are no releases from any SWMU's. Be advised, release information being asked for includes releases into the atmosphere. Any information required by items 3 and 4 must be provided.

Further processing of your permit application is temporarily held in abeyance pending review of your complete response to this letter. Please submit your complete response no later than February 6, 1991.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 8

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/sgl

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



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

November 16, 1990

Mr. Michael Sanderock
Facility Manager
TRICIL RECOVERY SERVICES, INC.
Bartow Municipal Airport
Avenue D North
Route 3, Box 249
Bartow, Florida 33830-9504

Re: Construction Permit Application (after-the-fact).
Drum Sampling, Fuel Mixing/Blending
DER File #AC53-185320

Dear Mr. Sanderock:

The Department received Tricil's second check in the amount of \$200. on October 23, 1990. The application fee submitted is now appropriate, therefore, the Department now has authority under Section 403.087, Florida Statutes, to formally begin processing the above referenced permit application.

The Department received additional written information from Tricil regarding the above referenced application on October 18, 1990. Please be advised that the application remains incomplete until the Department receives the additional information requested below. The following additional information is requested pursuant to Rules 17-4.055, 17-4.070, 17-2.620(1), 17-2.620(2), 17-2.660, and 17-2.670, F.A.C. Tricil is hereby reminded that all additional information of an engineering nature submitted to the Department must be signed and sealed by a professional engineer registered in the State of Florida.

- (1) The information submitted by Tricil to justify the assumption of an evaporation rate constant of 0.5 lb/hr ft^2 actually demonstrates that the constant should be at least 3 times higher. Additionally, the test runs were conducted with "typical" solution compositions rather than "worst case" solution compositions. Please re-calculate VOC emissions using a more appropriate evaporation rate constant and re-model the ambient air concentrations using the re-calculated emission values. Don't forget to include the background ambient air concentrations from the other sources at the Tricil facility while modeling the ambient air concentrations from the sources covered by this permit application.

- (2) How does Tricil intend to document and demonstrate continuing compliance with the emission levels summarized in attachment 5.4 of the permit application? Attachment 5.4 concerns the "Total Process Emission Summary", not just "product drumming" as averred in Tricil's letter dated October 17, 1990. The Department understands that the emission levels in attachment 5.4 may need to be increased as a result of item #1 of this letter.
- (3) The waste analysis plan submitted on October 18, 1990 indicates that NESHAP chemicals may be received, thereby triggering Rule 17-2.670, F.A.C. Please describe how Tricil intends to comply with the requirements of 40 CFR 61 Subpart V., adopted by Rule 17-2.670, F.A.C.
- (4) Please explain how Tricil intends to comply with 40 CFR 60.480, Subpart VV, adopted by Rule 17-2.660, F.A.C., at the entire Tricil facility. The Department needs to know how Tricil intends to comply, ie., exactly what procedures and recordkeeping measures are proposed to demonstrate compliance. Tricil's October 18, 1990 response indicates only that Tricil is assessing how to comply. The Department requires the results from that assessment.
- (5) The waste analysis plan submitted on October 18, 1990 describes the waste parameters that are monitored by Tricil, but does not describe the decision making process used to determine whether the wastes are incompatible. Assuming that the waste parameter monitoring is done as proposed, how does Tricil then make the final decision as to whether the wastes are incompatible.
- (6) Tricil's letter submitted on October 18, 1990 seems to indicate that Tricil does not intend to interconnect vents on receiving and discharging containers during all loading and unloading operations? One reason stated was that explosive gas levels would be generated. The Department believes that the vapor concentrations would be limited by the vapor pressure of the solvents. Please explain why this would not be true if the containers were interconnected. Another reason stated was that there would be contamination of the liquids. Since the liquids are being mixed in the receiving tank anyway, why would mixing the vapors contaminate the liquids?
- (7) The flow rate information on the process flow diagram figure 3.2 is unintelligible. The diagram submitted on October 18, 1990 is no better. Please provide a readable copy.

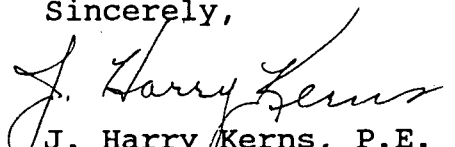
- (8) For each odor control option itemized below, please explain why the building containing the operations relating to this permit application or the individual sources should not be required to install and operate the odor control option. Please note that the modeling referred to in Tricil's October 18, 1990 submission needs to be re-done before any valid conclusions can be drawn from the model.
- (A) Activated carbon adsorption.
 - (B) Dispersion/dilution, by a stack of sufficient height to assure that the threshold of odor objectionability is not exceeded at ground level at any position downwind from the stack where humans might normally live, work, or play.
 - (C) Incineration/flame oxidation.
 - (D) Catalytic incineration/catalytic oxidation.
 - (E) Chemical oxidation by an oxidizing agent.
 - (F) Absorption by air scrubbers or washers.
 - (G) Masking/odor modification, by an industrial odor modifier.

NOTICE!

Pursuant to Section 120.60, F.S., and Rule 17-4.070(2), F.A.C., if the Department does not receive satisfactory responses to this request for additional information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available.

Pursuant to Section 120.60, F.S., the Department hereby suspends the processing of your permit until receipt of the requested additional information. If you have any questions, please call Mr. Gary A. Maier at (813) 623-5561 ext. 412.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer



Florida Department of Environmental Regulation

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

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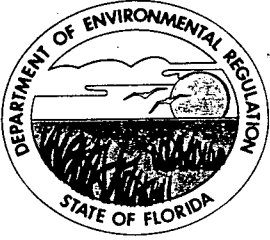
DATE: Nov. 9, 1990

TIME: 9:00 AM

SUBJECT: To discuss upcoming NOD items. See enclosed draft NOD

A T T E N D E E S

Name	Affiliation	Telephone
<u>Victor San Agustin</u>	<u>FDER - HW</u>	<u>(813) 623-5561, ext. 390</u>
<u>Gary Maier</u>	<u>FDER - Air</u>	<u>" " " ext 412</u>
<u>Bill Crawford</u>	<u>FDER- RCRA</u>	<u>813-623-5561 ext 398</u>
<u>Steve Taylor</u>	<u>Laidlaw Envir. Ser.</u>	<u>813-533-6111</u>
<u>Ashley Z. Chadwick</u>	<u>" " "</u>	<u>(615) 643-4511 ext ²⁴⁴ 8860</u>
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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

DRAFT

Mr. Michael Sanderock
Facility Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830

RE: HC53-170970, Construction Permit Application
Second Notice of Deficiency (NOD)

Dear Mr. Sanderock:

The Department acknowledges receipt of a September 5, 1990 letter from Steve Taylor and the 6 revised copies of the Part B application on September 7, 1990. Review of the submittals shows that the application is incomplete. This letter is to request for more additional information pursuant to Chapter 17-730, F.A.C. Additional information requested are as follows.

TANKS

1. Pursuant to §270.16 and §264.192, the part B application must include a written assessment that is reviewed and certified by an independent, qualified professional engineer registered in Florida for each new tank system. These assessments were not provided with the part B application, so please provide them for all proposed tank systems to be regulated under RCRA. This includes ancillary equipment and secondary containment systems pursuant to §260.10.
2. Item 2.a. of the response indicates the maximum relief pressure of 1 oz/in² is for the manhole covers. For future reference, we would also like the relief pressure setting specified for the 3" vents, so please revise Table 12.1 accordingly. We also requested for UL-142 specifications. The response indicates a copy of UL-142 has been provided to the Department. Our records indicate Tricil provided us API 650, 6th edition, April 1977. Please provide us the UL-142 specifications.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 2

Be advised we want the specifications, not the book. We expect the applicant to provide the specifications. The Department feels it is not appropriate for LESB to have DER acquire UL-142 and take the time to determine the specifications for LESB.

Items 2.b. and 2.f. of the response and page I-34 indicate fuel blending tanks T-111, T-112 and T-114 are not relevant to this RCRA storage permit application. Be advised this application is for storage and treatment which you even indicated in page G-2.

The Department intends to regulate these units as tank systems as defined in §260.10. As such, we request any additional information required by §270.16 and §264.192 should be provided in the part B for these tank systems. Be advised similar information is required for pumps, piping, or any equipment meeting the definition of ancillary equipment.

4. Other units which the Department believes should be regulated as tank systems as defined in §260.10 are a drip tray and sump as described in drawing K-4 entitled, "Inorganic Waste Treatment Process Flow Diagram". We also believe the 2 unlabelled tanks in Fig. 12.4 should be regulated under RCRA. Since §260.10 includes ancillary equipment, the RCRA waste handling pumps and associated piping will also be regulated.

Furthermore, Section 1.7.2 indicates the inorganic waste filtration system includes two polymer mix units. Since the part B provides little information about these units, we believe they should be regulated as tank systems.

Any information required by §270.16 and §264.192 should be provided in the part B application for the above mentioned units. We recommend you list all of the regulated tanks and ancillary units in one or more tables.

5. Item 2.g. of the response indicates the Department should review API 650, Section 3 to obtain wall thickness. Review of the section shows a variety of topics, shall design being one of them. Review of this subsection shows an equation for obtaining wall thickness. Be advised we expect you, not DER to perform these calculations and determine the thickness. They are not specified as indicated in the September 5 letter. Please specify them.

6. The response to 2.1 again refers us to API 650, Section 3. The section however, again shows a variety of recommended seams. The Department expects you to specify these seam standards.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 3

201-210 will be RCRA tanks

7. The Department agrees that intermediate tanks T-211 to T0214 are not regulated under RCRA. As such, the following requests for additional information pertain only to tanks *intermediate*
R-202 and R-203.

- steel bottom tanks*
- a. Same as 5. above. Please specify the wall thickness.
 - b. Item 2.1. of the response again referred us to API 650. Please provide the tank standards.
 - c. Item 2.n. of the response again referred us back to API 650. Again, we expect you to provide the seam specifications in the Part B.
 - d. Item 2.o. of the response again refers us to UL 142. Again we expect you to provide responses to items i) to vii).

agree

Furthermore, the response to viii) indicates the tank will operate at a vacuum after the hot material cools. Will the tanks ever operate above atmospheric? If so, we would like to know the maximum pressure and the pressure relief specifications.

8. The following questions apply to acid waste tanks T-801 to T-803.

- available
© DEC*
- a. Items 2.r. and 2.t. of the response state standards for FRP tanks have been provided to the Department. Permitting staff checked our files for this copy. We however, do not have what you are referring to. Please provide them.
 - b. The response to 2.s referred us to pages I-30 to I-33. 2.s requested for scrubber specs for fume control of acid waste tanks. The scrubber specifications in pages I-30 to I-33 indicate each tank will have a fume adsorber. Each is to be designated as U127, U215, and U311. The specifications also indicate each will be a carbon bed adsorber containing 2000 lbs of carbon. Based on our review of other acidic waste treatment operations, scrubbers normally used are caustic (NaOH) scrubbers. Carbon adsorbers are normally used to adsorb volatile organic compounds, not acid fumes. Please explain why LESB feels a carbon absorber should be sufficient for acid fume control.
- agree*

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 4

9. This request pertains to alkaline waste tanks T-811 to T-813. The tank specification sheets in I-18 to I-21 indicate each tank will have an individual scrubber. The sheets however, do not specify the type of scrubber. It indicates information about the scrubber will be provided by the supplier. The scrubber specifications are needed for the purpose of satisfying this NOD item.

agree

The September 5 letter, which referred us back to pages I-30 to I-33, however indicates the scrubber specifications will be similar to U127, U215, and U311, which leads us to believe carbon absorbers can effectively absorb fumes from alkaline waste tanks. Based on our knowledge of other alkaline waste treatment operations caustic scrubbers are normally used. Please explain how these adsorbents can effectively control fumes from alkaline waste tanks.

10. This request pertains to neutralization reactors T-851 and T-852. Item 2.z. of the response indicates carbon adsorbents will also be used. Elementary neutralization operations are normally vented to a caustic scrubber. Please explain how your adsorbents can effectively control inorganic fumes from the reactors.

- agree*
11. Item 3 of the response indicates the sludge dryer has been deleted. Section 1.7.2, page 107 however, indicates a sludge dryer will be used to remove residual water from the filter cake. Please revise Section 1.7.2 to also delete the sludge dryer.

- agree*
12. Item 5 of the response indicates there may be several scrubbers, even off drawing K-4 shows there will be one scrubber designated as U-860 which the drawing shows as a 112 ft. high, 2.5 ft. diameter scrubber. The Department feels that process flow diagrams should reflect both material flow and equipment. In fact, the total number of tanks are reflected in the drawing. Why not do the same for the scrubbers. Dwg. K-4 must be advised to reflect the actual number of scrubbers.

- agree*
13. The inspection checklist indicates all scrubbers will be inspected for unacceptable pressure drop, integrity and odor. The acceptable pH and pressure drop ranges should be included in the checklist.

- that agree should be provided*
14. Item 7 of the response indicates carbon adsorption systems are not included in this application. Drawing K3 however, shows 3 carbon adsorbents U-127, 215 and 311. If these will be installed, the information requested in item 7 of the 1st NOD must be provided.

- Don't agree with less than the tanks are regulated*
15. Section 1.10 indicates tanks 201 to 214 require a RCRA permit. Please explain why they should be regulated as RCRA tanks.

MISCELLANEOUS UNITS

16. Page G21 of the application indicates the facility neither has nor will have miscellaneous units. Some of the equipment specified in the applicator appear to meet the definition as stated in §260.10. These units are listed below. The Department believes they should be specified in the part B permit as miscellaneous units.

Fuel Blending Area

Inorganic Treatment Area

- a. Shredder with Hopper (G-123, M-122)
b. Magnetic Separators (K-124, 142, 115)
c. Solids Grinder (G-143, 146)
d. Drum Scraping Machine (L0137)
e. Basket Filters (K-103, 105, 125)
f. Solids Extrusion Conveyor

- a. Filter Press (K-877)

Any information required under parts O and I of the application must be provided for the above miscellaneous units. In addition, information required under 40CFR264.601(c) must be provided for the above units. Item 15 of the response referred us to the air permits. Be advised the information provided in the air permits address only VOC emissions and not toxic emissions which we are requesting under §264.601(c)(1) to (6). These miscellaneous units should also be included under Section 1.10 entitled, "Facility Capacity".

17. Chart No. 1 entitled, "Solvent Recovery Process" in page I-94 indicates sludges and still bottoms from the solvent recovery processes are transferred to the fuel blending area. Please specify the heating value ranges of each sludge waste stream and each still bottom waste stream going to tanks R-202 and R-203.

CONTAINERS

18. Section 1.3.3 refers to removal of contents for solvent recovery only by using a spark proof wand connected to a flexible hose. Past inspections have shown forklifts are used to unload the drum and the contents are "splash loaded" into T-111, T-112, and T-114. If you plan to use the latter unloading method for solvent recovery, Section 1.3.3 must be revised to reflect the latter type of unloading. Also, please explain the conditions which force LESB to utilize the latter types of loading.

LESB
will review
and revise as appropriate

Review
Waste Analysis
Practice, Rev 2

Page 1-100
1-101

Process
HA, B, C, D type drums
are managed
This should
be addressed in
Containment mgmt and
perhaps Waste Analysis
Plan

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 6

*after being moved to
the treatment area by fork lift*

19. Section 1.5.3 indicates drums containing alkaline and acidic wastes will be transferred to the appropriate tanks or tank trucks via a spark proof wand and flexible hose connected to overhead piping. Review of the facility Layouts like Fig. 9.3 indicate the acid/alkaline container storage area and the acid/alkaline tanks are located on opposite sections of the plant and that there is no overhead piping connecting the storage tanks to the drum storage building. There seems to be overhead piping connecting the tanks in question to the North Treatment Area. Are you planning to have container storage here? If so, there appears to be no space available. Please explain in detail in Section 1.5 and Section 11.5 as to how the drum contents will be transferred to the storage tanks.
20. The Department expressed the same concern as in 19. above for metal bearing wastes. Please provide an explanation in Section 1.b.3. and Section 11.5.
21. Section 11 should also address the management of empty containers. Do you have a designated spot for storing them when a tractor trailer is not available? Section 1.2.4 indicates empty drums will be loaded on a tractor trailer. Please address the intermingling of incompatible empty drums in the trailer. Furthermore, ^{and} the same section mentions ~~that~~ contents from non-empty drums emptied, or poured or scraped into open head accumulation drums. Please designate locations for these accumulation drums. The open head drums should be closed when not in use pursuant to §264.173 so the second to the last sentence in page ~~8~~-92 should be reworded accordingly. _{1.}
22. The North Treatment Area has a designated spot for storing roll-off boxes. These containers will store filter cake. The Department believes these boxes should be regulated under RCRA as containers. Any information required under Part II, Section B of the application form must be provided as they pertain to the roll-off boxes.
23. DWG. K-4 indicates there will be bulk loading of wastes at the acid/alkaline waste area and at the north treatment area. Any information required by part II, Section B or C of the form pertaining to secondary containment should be provided. The Department believes there should be separate containment sections for these waste loading/unloading areas.

*will answer
reword*

agree

INSPECTIONS

24. The daily tanks inspection checklist should be revised to include a check for odor/fumes on top of the waste tanks and a check on the N₂/CO₂ blanketing system effectiveness. *LESB will review*
25. An inspection checklist/s for miscellaneous units should be added to Chapter 6 pursuant to §264.15 and Part II, Section I of the permit application. The narration in Chapter 6 should be revised accordingly. *agree*
26. A daily inspection checklist should be provided for carbon absorbers U-127, U-215, and U-311. The narrations in Chapter 6 should be revised accordingly. *agree*
27. An inspection checklist should be provided for the roll-off boxes or any other containers located at the North Treatment Area pursuant to §264.174 and §264.15, The narration in Chapter 6 should be revised accordingly. *agree*

WASTE ANALYSIS PLAN

28. The Generator's Waste Material Profile Sheet (Fig. 4.1) shows metal bearing wastes should be analyzed for Total Metals ~~of~~ by using the EP Toxicity test. Page 4-1 also indicates the Toxicity Characteristic Certification form (Fig. 4.2) would be submitted only if necessary. Under what conditions will it be necessary to complete Fig. 4.2? Please explain the criteria. ~~We also recommend the EP Toxicity reference be removed now that TCLP has replaced it.~~ *agree*
29. Section 4.3.2 indicates one appropriate representative sample of the waste in the truck will be obtained. Some truckloads contain wastes in which the physical composition is non-homogeneous, i.e., the metals congregate in the bottom of the tank truck or waste densities vary at the bottom, middle and top layer in the tank truck. For tank trucks containing non-homogeneous wastes, please explain how you should obtain a representative sample. *SWMU's*
30. Page G21 of the application shows that SWMU's existing at the facility are storage tanks and waste recycling operations. Furthermore, page G22 indicates all SWMU's are described in the Part B. Review of the part B shows many equipment descriptions, but none of the descriptions identify the affected equipment as SWMU's. Any information required by item 2 in page G22 must be provided. We would like to see the SWMU descriptions, capacities, dimensions, and locations tabulated.

Mr. Michael Sanderock

RE: HC53-170970, Construction Permit Application

Page 8

31. Items 3 and 5, page G22 of the application indicates there are no releases from any SWMU's. Be advised, release information being asked for includes releases into the atmosphere. Any information required by items 3 and 4 must be provided.

Further processing of your permit application is temporarily held in abeyance pending review of your complete response to this letter. Please submit your complete response no later than January 6, 1991.

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/sgl

cc: Satish Kastury, BWP&R

N O T I C E O F M E E T I N G

Today's date: November 5, 1990 Writer: SAN AGUSTIN

Date of meeting: November 9, 1990

Time: 9:00 AM

Place: Air Dept. Meeting Room

Subject: HC53-170970, Expansion of Existing Plant
Part B Permit Application

Explanation: Wants to discuss NOP items first before sending
them out.

Requested by: San Agustin Ph.# ext. 390

Names of attendees
other than DER: Mike Sanderock, Steve Taylor

Local Program
notified: N/A ☐ yes ☐ no Attending? _____

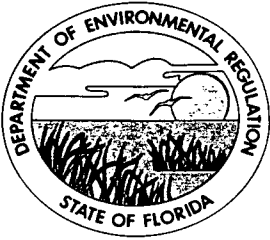
Copies to anticipated
in-house attendees:

Victor San Agustin,
Bill Crawford

Information
copies to:

Clake Polk

Gary Maier



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

November 5, 1990

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

RE: HC53-170970, Notice of Meeting on
Upcoming Second Notice of Deficiency

Dear Mr. Sanderock:

As discussed with Mr. Steve Taylor on November 5, 1990, this letter is to notify you of a meeting to discuss the contents of an upcoming Notice of Deficiency (NOD) for the above referenced permit application.

The Department feels it would be mutually beneficial to discuss each NOD first rather than surprise you by sending the NOD in the mail. Some of the NOD items are merely clarification type questions which can be resolved at the meeting.

The meeting will be held at the Tampa DER office on Friday, November 9 at 9:00 AM. We look forward to meeting with you.

Sincerely,

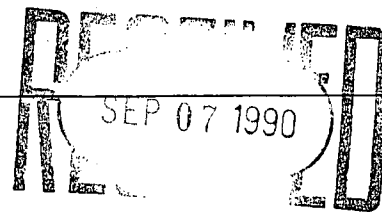
Victor San Agustin, P.E.
Professional Engineer II
Division of Waste Management

VSA/br

cc: Satish Kastury, BWP&R



September 5, 1990



WASTE MANAGEMENT

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

Re: HC53-170970, HW Tanks Construction

Dear Mr. SanAgustin;

In response to your letter of January 9, 1990, requesting further information for review of the referenced permit application, we are submitting this letter and six revised copies of the RCRA Part B application. In addition to your questions, corporate review of the application resulted in the main text being extensively revised to include more EPA waste codes accepted, consolidating chapter 11 (compatibility) with chapter 1 (waste accepted), and the correction of several typographical errors. Editing, plus changes in personnel and responsibilities within the company have created this long delay, but your patience is appreciated and we trust that this submittal is complete to your satisfaction.

In the original document submitted on October 26, 1989:

1. Replace the Table of Contents and Chapters 1 through 14 in their entirety.
2. Replace Appendix D entirely.
3. Replace Appendix G entirely.
4. Replace Appendix I entirely.
5. Replace Appendix K entirely.
6. Replace Appendix L entirely.
7. Appendices A,B,C,E,F,H, and J are not changed.
8. Replace the book cover and binder label.

1. All site diagrams have been altered to show the pipe rack in question.
2. a The relief pressure referenced in table 12.1 refers to the pressure necessary to lift the manhole cover, which is loosely bolted and acts as an emergency vent opening.
 - b. T-111 is a sludge mix tank used for fuel blending and cannot be kept tightly sealed, since drums are frequently dumped into it.
 - c. The standards for construction for these tanks are in UL-142, a copy of which has been provided to the Department.
 - d. Sufficient acid waste for all treatment is expected to be available, so only alkaline reagents may be expected to be used and they are referenced in Section 1.5.2, page 1-102.
 - e. New tank management practices are discussed in Section 12.2.2, page 12-1.
 - f. Tanks T-111, T-112, and T-114 are fuel blending process tanks, and therefore are not subject to this RCRA storage permit.
 - g. Tank wall thickness is specified in API650, section 3.
 - h. Acronyms used in materials of construction are provided on page I-2, as well as the year of API650.
 - i. Seam specifications are in API650, section 3.
 - j. This is a 6" diameter flanged fitting.
 - k. Wall thicknesses are specified in API650, section 3.
 - l. Tank construction standards are specified in API650.
 - m. Relief vent is shown on page I- 52 as item L.
 - n. Seam specifications are in API650, section 3.
 - o. See item 2C above.
 - viii) Since these tanks are receivers for still bottoms, hot material may be put into the tanks and will create a partial vacuum as it cools.
 - p. Working pressure is on page I-14. Other specifications are as in API650.
 - q. The tanks are designed to operate at atmospheric pressure.

r. Standards for FRP tanks have been provided to the Department. As with API standards, the latest revision at the time of construction will be the source for tank standards.

s. Scrubber specifications are on pages I-30 to I-33.

t. These are fiberglass - reinforced polyester tanks which are entirely compatible with the contents. See the FRP standards for more information.

u. API650 standard will be the latest revision at the time of construction. The tanks are designed to be used at atmospheric pressure (I-18).

v. See S above.

w. Abbreviations are on page I-2. Carbon steel is compatible with alkaline wastes and a 1/8 inch corrosion allowance is specified.

x. Corrected.

y. This is a generic form. Lines left blank do not pertain to this particular application.

z. See S above.

aa. Latest revision at time of construction.

bb. The drip tray shown in K-4 is an inclined trough, not a container, and is intended to direct drips into the sump. The sump is merely a low point within a contained area to collect waste for pumping out. Neither is a tank.

cc. The City of Bartow would not provide specific discharge standards, preferring to accept wastes on batch-approval basis. Page 1-106 mentions the handling of wastes not acceptable to the POTW.

3. The sludge dryer has been deleted.

4. The sump will be operated as any other sump on-site, by being pumped after visual observation shows that it contains enough waste to pump.

5. The schematic drawing K-4 represents flow paths only, and may actually be several scrubbers.

6. Corrected.

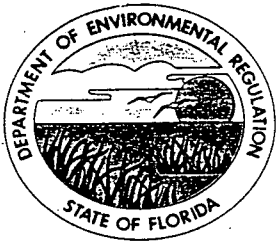
7. Emissions will be vented through scrubbers; see inspection checklist page 6. Carbon absorption systems are not included in this application.
8. Corrected.
9. Treatment chemicals will be stored in standard 55-gallon drums, and all chemicals and roll-off boxes will be contained similiary to treatment and storage tanks.
10. Concrete sealant specifications are provided in Appendix D. Refer to the existing Part B construction application for structural integrity of the existing portion of the building. When the engineering work is done for the new portion, a structural integrity assessment will be completed. It is not available at this time.
11. No rail access is available at this site.
12. The South edge of the building is 50'0" from the fence line. The fence lies outside of the property line. To rectify this, page 11-2 specifies that a 2'6" aisle will be maintained between stored drums and the South wall of the building.
13. Page G-13 was incorrect. It has been corrected.
14. See 13 above.
15. See 13 above. All air emissions from existing equipment have been address through the Air Section permitting. Refer to air construction and operation permit files for further data.

Sincerely,



Steve Taylor
Safety & Compliance Manager

ST/mj



dictator do you have the file?
YES USA 8/12
This needs to go in file

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 12, 1990

Mr. James H. Scarbrough, P.E., Chief
Waste Management Division
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Scarbrough:

In accordance with the Memorandum of Agreement for authorization, we are providing your office with information on the following Southwest District facilities:

- 1) Florida Tile; FLD 004 091 583; Closure Permit HF 53-122065; Review of quarterly groundwater monitoring report and post-closure checklist; dated May 31, 1990.
- 2) Royal Bumper Plating Company; FLD 042 475 723; OGC #84-0458; DER proposed settlement; dated April 23, 1990.
- 3) General Components; FLD 004 088 258; Closure Permit Application HF52-168044; Minutes of meeting (2/15/90); dated April 25, 1990.
- 4) A-AAA; FLD 061 433 934; Closure Permit HF 29-090371:
 - a) Review of closure certification; dated February 20, 1990.
 - b) Approval of closure certification; dated April 27, 1990.
- 5) Tricil Recovery Services, Inc.; FLD 980 729 610; HC 53-170970; Deadline extension for response to NOD; dated April 13, 1990.
- 6) Loral Data Systems; FLD 083 200 998; Closure Permit HF 58-110918; Confirmation of meeting; dated April 11, 1990.
- 7) Precision Plating and Anodizing, Inc; FLD 059 397 844; OGC #86-0827; Letter from Lloyd Weed to Diane Trommer; dated April 23, 1990.
- 8) Wenczel Tile; FLD 042 468 355; Closure Permit HF 29-127086; Review of quarterly groundwater elevations; dated April 12, 1990.
- 9) GNB; FLD 000 608 083; Closure Permit HF 29-139372; Request for extension of closure permit; dated May 2, 1990.

Mr. James Scarbrough
June 12, 1990
Page Two

- 10) Pall Land and Marine Corporation; FLD 046 855 086; Closure Permit Application HF 51-177190; First NOD; dated May 31, 1990.
- 11) Safety-Kleen Corporation - Manhattan Avenue Facility; FLD 049 557 408; Closure Permit Application HF 29-158003:
 - a) Minutes of phone conference call; dated April 9, 1990.
 - b) Transmittal of comments pertaining to QAPP (with attachments); dated May 4, 1990.

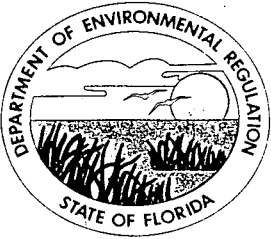
These documents are provided for your files and information, no action on your part is required. Should you have any questions, please call me at 904/488-0300.

Sincerely,



Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/SG/mh
Enclosures
cc: (wo/enclosures)
Facility Files
Kent Williams, EPA/Region IV
Alan Farmer, EPA/Region IV
Bill Crawford, DER/Tampa



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

August 14, 1990

Mr. Mike Sanderock
Facility Manager
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

RE: HC53-170970, Hazardous Waste
Construction Permit Application

Dear Mr. Sanderock:

We received on August 9, 1990 a letter from Mr. Steve Taylor requesting another extension to respond to DER's first notice of deficiency. To date, this would be the fifth time that Tricil requested an extension. The first notice of deficiency was issued on January 9, 1990.

We have no objections to the request, so we are extending the deadline to September 10, 1990.

Please be advised that it has been over 8 months since our NOD was issued. Although we have no federal or state deadline commitments to take a final action on this application, our statewide application tracking system shows your application as being one of the most delinquent. If you intend to ask for another extension after this, we would probably not agree because all Department permit processors are now being required to require a timely response to all notices of deficiency.

Sincerely,

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

VSA/br

cc: Satish Kastury, BWP&R





D.E.R.

AUG 10 1990

SOUTHWEST DISTRICT TAMPA

August 9, 1990

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

Re: HC53-170970, Tricil Recovery Services, Inc.

Dear Mr. SanAgustin;

Completion of revisions and printing of our RCRA Part B permit application has taken longer than expected. Since it is our desire to submit a document as complete and correct as possible, we request a further extension of time to submit the revised application, until September 10, 1990. Your cooperation is greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Steve Taylor".

Steve Taylor
Safety and Compliance Manager

ST/mj



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

July 17, 1990

Mr. Mike Sanderock
Facility Manager
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: HC53-170970, Hazardous Waste
Construction Permit Application

Dear Mr. Sanderock:

We received Mr. Steve Taylor's July 9, 1990 letter which requests another extension to respond to our January 9, 1990 letter of incompleteness by August 10, 1990.

We have no objection to the request so we will expect a complete response from you by August 10, 1990.

Sincerely,

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

VSA/ab

cc: Satish Kastury, BWP&R





D.E.R.

JUL 10 1990

SOUTHWEST DISTRICT
TAMPA

A, 3-c

July 9, 1990

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

Re: HC53-170970, Tricil Recovery Services, Inc.

Dear Mr. SanAgustin;

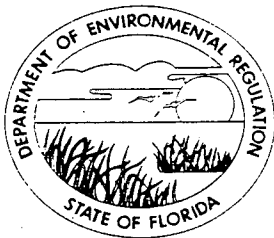
Revision and engineering approval of our RCRA Part B permit application has been delayed and we will be unable to meet the July 13 submittal date. Due to these circumstances, we are requesting an additional extension of time to submit the revised application, to August 10, 1990. Also, please direct future correspondence on this matter to the Facility Manager, Mike Sanderock. Your cooperation is appreciated.

Sincerely

A handwritten signature in cursive script that reads "Steve Taylor".

Steve Taylor
Safety and Compliance Manager

ST/mj



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

June 12, 1990

Mr. Steven J. Taylor
Safety and Compliance Manager
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: HC53-170970, Hazardous Waste
Construction Permit Application

Dear Mr. Taylor:

We received your June 1, 1990 letter which requests an extension to respond to our January 9, 1990 letter of incompleteness by July 13, 1990.

We have no objection to the request so we expect a complete response from Tricil by July 13, 1990.

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

Sincerely,

Victor San Agustin

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

VSA/br

cc: Satish Kastury, BWP&R



D. E. R.

June 1, 1990

JUN 4 1990

SOUTHWEST DISTRICT
TAMPA

Mr. Victor SanAgustin
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FLorida 33610-7347

Re: HC53-170970, Tricil Recovery Services, Inc.

Dear Mr. SanAgustin;

Since changes have been made to our RCRA part B permit application, we have been unable to review the new text for completeness and accuracy due to the absence of persons responsible. Therefore, we are requesting an additional extension of time to submit the revised document, to July 13, 1990. If you have any question, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Steven J Taylor". The signature is written in dark ink and is positioned above the printed name and title.

Steven J Taylor
Safety and Compliance Manager

SJT/mj



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

April 13, 1990

Mr. Steven Taylor
Safety and Compliance Manager
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: HC53-170970, Construction of Hazardous Waste Storage Tanks
and Container Storage Area

Dear Mr. Taylor:

Department staff reviewed your April 12, 1990 letter which requests for a second extension to respond to our January 9, 1990 letter of incompleteness by June 1, 1990.

We have no objections to your request so we will expect a complete response from Tricil by June 1, 1990.

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

Sincerely,

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

VSA/ab

cc: Satish Kastury, BWP&R



April 12, 1990

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

D. E. R.
APR 13 1990
SOUTHWEST DISTRICT
TAMPA

Re: HC53-170970, Tricil Recovery Services, Inc.

Dear Mr. San Agustin;

Since the recent acquisition of this facility by Laidlaw, Inc., the corporate office in Columbia, S.C., is reviewing the Part B permit application to determine what changes may need to be made to better address their intentions for future use of the property. Therefore, I must request an additional extension of time to reply to your request for additional information, to June 1, 1990 (45 days). If you have any questions, please contact me.

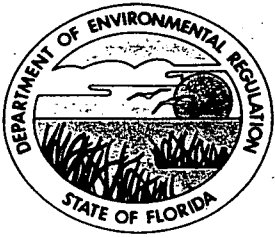
Sincerely,

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

Steven J. Taylor
Safety and Compliance Manager

SJT/mj

0462A



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

February 20, 1990

Mr. James M. Richard
Reynolds and Richard
Post Office Box 943-E
Wooster, OH 44691

Dear Mr. Richard:

We have received your February 5, 1990 letter which requests information regarding Tricil Recovery Services, Inc.'s proposed expansion. This letter is in response to your inquiry.

In summary, Tricil submitted on October 26, 1989 a hazardous waste permit application to construct additional hazardous waste storage tanks and to construct an expanded hazardous waste container storage area. Tank storage is expected to increase from 200,000 to 343,200 gallon. Container storage is expected to double from 81,180 to 162,360 gallon. As you requested, enclosed is a short narrative and drawings of the proposed expansions.

I hope this letter satisfies your request. If you have any questions, please call me at (813) 623-5561, extension 390.

Sincerely,

Victor San Agustin

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

VSA/ab

cc: Steve Taylor, Tricil Recovery Services

343,200
162,360
505,560

281,180 to



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

February 20, 1990

Mr. Steven Taylor
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: HC53-170970, Construction of Hazardous Waste Tanks and
Container Storage Area

Dear Mr. Taylor:

Department staff have reviewed your February 12th letter which requested for an extension to respond to our January 9, 1990 letter of incompleteness by April 15, 1990.

This letter is to inform you we have no objections to your request so we will be expecting a complete response from Tricil by April 15, 1990.

If we can be of further assistance, please call me at (813) 623-5561, extension 390.

Sincerely,

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

VSA/ab

cc: Satish Kastury, BWP&R

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered; date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Mr. Mike Sandercock
Facility Manager
Tricor Recovery Services
170 Barton Municipal Airport
Barton, FL 33830-9504

4. Article Number

P 149 935 552

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address

X *Michael J. Sandercock*

6. Signature - Agent

X *[Signature]* AUG 16 1990

7. Date of Delivery

8/14/90

SOUTHWEST DISTRICT

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Victor San Agustin

STATE OF FLORIDA

~~DEPARTMENT OF ENVIRONMENTAL REGULATION~~

4520 OAKFAIR BLVD.

~~TAMPA, FLORIDA 33610~~

Waste mgmt.

MEMORANDUM

TO: J. Harry Kerns
FROM: Gary A. Maier *Gary A. Maier*
DATE: January 29, 1990
SUBJECT: Tricil Recovery Services Inc.
County: Polk
Project: Solvent Recycling and Waste Fuel Blending.

Per your request, I have reviewed the Tricil air permits, visited the facility, reviewed the applicable rules, and prepared recommendations.

The attached report is organized as follows.

- I. SUMMARY
 - A. Facility Description.
 - B. Facility Inspection.
 - C. Recommendations.
- II. APPLICABLE RULES.
 - A. Florida.
 - B. Federal.
- III. AIR PERMITTING STATUS.
 - A. Existing Permits.
 - B. Unpermitted Sources.

I. SUMMARY

A. Facility Description.

Tricil Recovery Services Inc. operates a facility that reclaims and recycles industrial solvents for re-use in the marketplace. They also blend non-reclaimable solvents and solvent impurities into a waste fuel that is burned in industrial furnaces, such as cement kilns. Tricil Recovery Services Inc. is a "for profit" corporation.

The facility is located on land leased from the Bartow Municipal Airport Development Authority. Private residences exist on contiguous property.

Tricil operates four types of separation and purification systems. They are (1) a vacuum still, (2) a thin film evaporator, (3) a 62-foot distillation column, and (4) a liquid-liquid extractor. Waste solvent is delivered to the site in 55 gallon drums. Intermediate products and final products are stored in tanks. Final products are loaded into tanker trucks for shipment.

B. Facility Inspection.

The following observations were based upon a visit to the facility on January 24, 1990, with Matt McCann and Viet Ta.

1. No VOC emission control systems were used.
2. One blending tank was open to the atmosphere and another was partially covered.
3. A grinder which blends sludges, distillation bottoms, and non-reclaimable solvents was open to the atmosphere.
4. Pump seals, valves, and pressure relief devices were not regularly monitored for leakage.
5. There was no vapor recovery during truck loading.
6. Prudent and inexpensive engineering practices, such as interconnecting vents on receiving and discharging containers, were not used.
7. Solvent odor was obvious while driving on the street in front of the private residences.

C. Recommendations. (See section II. for rule descriptions)

1. Require Tricil to demonstrate compliance with the permitted mass emission limits by a comprehensive material balance. They routinely keep accurate records of what comes in and what leaves the plant, therefore, a material balance should be possible both retroactively and prospectively.
2. Require close fitting hoods for all open blending tanks and for the still bottoms grinder (17-2.620(1)(a)).

3. Require compliance with NSPS rules regarding VOC equipment leaks (17-2.660(2)).
4. Require compliance with NESHAP rules regarding VOC equipment leaks, unless Tricil can qualify for exemption. If they request exemption, then require appropriate statistical screening of incoming material to adequately demonstrate continuing exempt status (17-2.670)).
5. Require, at a minimum, interconnection of vents on receiving and discharging containers during loading and unloading operations. A vapor recovery system is recommended (17-2.620(1)(a)).
6. Require permits for unpermitted sources.
7. Verify compliance with 40 CFR 79, Registration of Fuels with the EPA.

II. APPLICABLE RULES

A. Florida Rules

Rule 17-2.620(1)(a), F.A.C. requires the application of,

1. known and existing vapor emission control devices, OR
2. systems deemed necessary and ordered by the Department.

Presently, neither exist at the Tricil facility.

Rule 17-2.620(2), F.A.C. prohibits the discharge of air pollutants which cause or contribute to an objectionable odor. There are private residences on property contiguous to the facility. While driving on the road in front of these residences on January 24, 1990, solvent odor was obvious. In my opinion, the odor was objectionable.

Rule 17-2.660(2), F.A.C. adopts the EPA NSPS standards listed in Table 660-1. The adopted standard applicable to Tricil is Section 60.480, Subpart VV, Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry. This Subpart is applicable because:

1. The Tricil facility was constructed after January 5, 1981. (Construction permits were issued in 1987).
2. The facility has a design capacity exceeding 1,000 Mg/yr. (The construction permit application shows a design capacity greater than 14,000 Mg/yr).
3. The facility accepts raw materials as input, and produces one or more of the chemicals listed in section 60.489 as final products for sale in the marketplace, thereby qualifying under the definition of Synthetic Organic Chemicals Manufacturing Industry, both literally and with the intent behind the rule. This interpretation has been informally verified with the EPA.

Subpart VV requires either vapor recovery or stringent maintenance procedures and recordkeeping for pumps, compressors, pressure relief devices, sampling connection systems, and valves. Presently, Tricil does not comply with these requirements.

Rule 17-2.670, F.A.C., NESHAP, adopts the Federal standard contained in 40 CFR 61. The applicable section is 61.240, subpart V, Equipment Leaks (Fugitive Emission Sources). It applies to any equipment intended to operate in volatile hazardous air pollutant (VHAP) service, including pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, flanges and other connectors. Vapor recovery or maintenance procedures and recordkeeping, similar to, but more stringent than NSPS subpart VV above, are required. Any equipment that contacts

a fluid that is at least 10% volatile hazardous air pollutant by weight is considered to be in VHAP service. Tricil has hazardous air pollutants listed in their permit applications (for example, benzene), therefore, they should have the burden to prove that no equipment is in VHAP service if they want an exemption from this rule. Statistical screening of incoming materials is recommended in order to satisfy the burden of proof.

B. Federal Rules

40 CFR 79 - Registration of Fuels and Fuel Additives, requires any person who, for sale or introduction into commerce, produces or manufactures a fuel, to register the fuel with the EPA. The EPA may require testing to determine potential public health effects. The penalty for non-compliance is \$10,000. for each and every day of the continuance of such violation.

The DER has at least two options regarding the enforcement of Federal Rules that are not officially adopted by the State. The first is to petition the EPA or the Lands and Natural Resources Division of the Department of Justice to bring an enforcement action. The second is to file a civil action in Federal District Court as a "person" under Section 304(a)(1) of the Clean Air Act. The definition of "person" includes agencies.

III. AIR PERMITTING STATUS

A. Existing Permits

1. A053-128774, Permit to operate a tank farm.
2. A053-131682, Permit to operate a facility to reclaim and purify waste organic solvents.
 - a. Vacuum still.
 - b. Thin film evaporator.
 - c. Distillation column.
3. A053-133758, Permit to operate a 600 HP boiler.
4. A053-153224, Permit to operate 3 product tank truck loading bays.

B. Unpermitted Sources.

1. Sludge and Still Bottoms Grinder. Sludge and Still Bottoms are ground and mixed with liquid solvent in this process unit. It is part of the fuel blending process. The top of the grinder is open to the atmosphere. I was able to confirm that it is a source of VOC emission by standing next to it and sniffing the air.
2. Waste fuel blending tanks. One tank is open to the atmosphere and another is partially covered. I could smell VOC emission.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

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3. Article Addressed to: James Lederer Tricil Recovery Ser. Inc Route 3, Box 249 Bartow, FL 3383-9504	4. Article Number P149 935 035
5. Signature - Address X Madlock	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988

* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

P 149 935 035

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

PS Form 3800, June 1985

Sent to James Lederer	
Street and P.O. Tricil Recovery	
City, State and ZIP Code Rt. 3, Box 249	
Postage Bartow, FL 33803-9504	
Certified Fee	9504
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date 1-9-90	

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D. E. R.



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JAN 16 1990

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SOUTHWEST DISTRICT

TAMPA

Print Sender's name, address, and ZIP Code in the space below.

Victor San Austin

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

4520 OAK FAIR BLVD.

TAMPA, FL 33610-9544

RETURN
TO



u



VIA CERTIFIED MAIL

D. E. R.

FEB 15 1990

SOUTHWEST DISTRICT
TAMPA

February 12, 1990

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

Re: HC53-170970, Hazardous Waste Tanks Construction
Application

Dear Mr. Garrity;

Tricil Recovery Services, Inc. will be unable to complete our response to your request for additional information regarding the above referenced RCRA part B application, within the time period stated. Therefore, we are requesting an additional forty-five days (to April 5, 1990) in which to provide the information. If you have any questions, please contact me.

Sincerely,
Tricil Recovery Services, Inc.

Steven J. Taylor

Steven J. Taylor
Safety and Compliance Manager

LAW OFFICES
REYNOLDS AND RICHARD

441 WEST LIBERTY STREET
P.O. BOX 943-E
WOOSTER, OHIO 44691
(216) 264-1150

D. E. R.

FEB 8 1990

SOUTHWEST DISTRICT
TAMPA

ROBERT J. REYNOLDS
CRAIG R. REYNOLDS

DON L. REYNOLDS
JAMES M. RICHARD

February 5, 1990

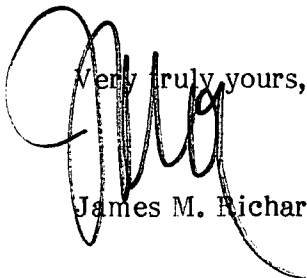
Mr. William Crawford
FLORIDA DEPT. OF ENVIRONMENTAL REGULATION
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Re: International Solvent Recovery, Inc. - Tricil Recovery Services Permit
Permit No.: H053 - 86011

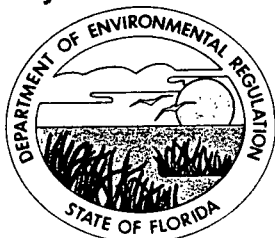
Dear Bill:

The last time I was at the Florida D.E.R., I noticed that Tricil had filed an application for construction permit to authorize an increase in their plant capacity. I do not believe that these filings are confidential. However, assuming that they are not confidential, I would appreciate it if you would forward directly to the undersigned a true copy of the construction permit application of Tricil. I actually only need the portions that deal with their planned increase in the plant storage capacity and/or processing capacity.

Very truly yours,


James M. Richard

JMR/paw



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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JAN - 9 1990

Mr. James Lederer
General Manager
Tricil Recovery Services, Inc.
Route 3, Box 249
Bartow, Florida 33803-9504

Re: HC53-170970, Hazardous Waste Tanks Construction

Dear Mr. Lederer:

The Department's hazardous waste staff acknowledges receipt of your application for a permit to construct additional hazardous waste storage and treatment tanks at Avenue D North, Bartow Municipal Airport in Polk County.

Review of your application shows that it is incomplete. Pursuant to Section 17-730, F.A.C., we request you submit the following additional information:

Tanks

1. Ancillary equipment connecting the south tank farm and drum storage building are not shown in 9-9. Fliers provided to the public show ancillary equipment. Figure 9.3 should be revised to show the ancillary equipment.
2. §264.191 and §264.192 require various specifications and data be included on each tank form. Below are a few comments:
 - a. Relief pressure for all tanks was set at 1.0 oz/in² as stated in page 12-2. Does this meet UL-142 specs.? We would like to have the UL-142 specs. At what internal pressure will the relief valve begin to open? At what internal pressure will the relief valve fully open?
 - b. Vertical vessel data sheet is too blurry to understand for T-111. According to I-10, T-111 is designed for 0 psig. Shouldn't you design the tank for a higher operating pressure to minimize volatilization of organic liquids?

- c. I-11 makes reference to vessels R-203/R-203. Design pressure, corrosion allowance, tank code, jacket design pressure were not stated. They should be stated.
- d. Page 2 of 10 of tanks checklist requires a description of treatment reagents. Your checklist indicates it is in 7-4 to 7-5 but they were not stated. Treatment reagents need to be stated.
- e. Tank Management Practices under page 2 of 10 was listed as not applicable. This section should be applicable and should be completed.
- f. Chapter 12 contains no data for tanks T-111, 112, or 114. Same data provided for the other tanks should be provided for T-111, 112, or 114.

Comments for T-151 to T-156 Specs

- g. No data on wall thickness. No relief valve setting information (just a maximum pressure of 6 psig). At what internal pressures will the relief valve begin to open and fully open? This type of information should be reflected on the equipment data sheet.
- h. Materials of construction not stated. Refers to CS*. What is this? All acronyms should be spelled out. Also refers to API 650. No year. The effective year of the standard should be included.
- i. Spec. sheets did not include specifications on seams. We would like to know the seam standards. I-13 references ANSI B16.5 & B16.11, but not the specific standards for seams.
- j. I-14 states tank vent is a FLG Type size 6. What is this?

Comments for T-211 to T-214 & R-202 to R-203

- k. Wall thicknesses not given. They should be given.
- l. Tank construction standard reported as 304 s.s. According to Mr. Lega, this means 304 stainless steel. This appears to be a material of construction and not a tank standard. We would like to know the tank standards for stainless steel and the year of the standard.
- m. I-17 indicates relief valves are set at 7 in. H₂O, but tanks schematic I-20 show no relief valves. Please clarify this discrepancy.

- n. Specification on seams not specified on spec. sheets.
- o. West Tank Farm indicates presence of R-202/R-203. These vessels are not described in chapter 1-49. R-202/R-203 have vertical vessel data sheet but not spec. sheets like the other tanks. As a result, the following information should be provided:
 - i) Tanks appear to be fed with steam. Need pressure setting on relief valve.
 - ii) Need maximum liquid level height.
 - iii) Need specific gravity of liquid and type of waste stored.
 - iv) Need specification on seams.
 - v) Need tank design code and year.
 - vi) Need shell thickness data. Why no lining?
 - vii) No pressure information. What is the symbol "*" for? We would like to have the pressure data.
 - viii) Maximum operating pressure reported as 28 in. Hg. vacuum. Why vacuum?

Comments for T-801 and T-803

- p. Need design pressure/working pressure data/seam specifications.
- q. There appear to be no pressure controls. Why none?
- r. Did not state tank standards or year of standards to be followed. If no standards exist for FRP's, please state so and report the specifications you used for FRP tanks in Nashville.
- s. I-24 indicates tanks will have a scrubber and vent. Need equipment specifications about the scrubber.
- t. Need corrosion allowance. Also need to demonstrate that such corrosion allowance can be maintained.

Comments for T-811 to T-813

- u. Need equipment specification information on working pressure, design pressure, wall thickness, year of API 650 standard.
- v. I-29 indicates the tanks is vented to a scrubber. Need specifications on the scrubber. What are the expected gaseous pollutants and their emission rates?
- w. Many specifications were marked as CS-*. What did you mean by this? There were many lines unfilled. All lines should be filled or marked N/A. Also need to specify corrosion rate and demonstrate how shell thickness can be maintained.

Comments for T-851 and T-852

- x. I-30 indicates working volume is greater than total volume. Please correct.
- y. All blanks need to be either filled or listed as N/A.
- z. Need scrubber specs. What are the expected gaseous pollutants and their emission rates?
- aa. Need to provide year of API-650 standards.

Comments for T-870 to T-873

- bb. K-4 shows the presence of a drip tray and sump. We would like an assessment done on whether or not these are tanks. If you agree that they are, all information required by the form pertaining to tanks must be provided.
 - cc. K-4 shows water is discharged into the sewer. What are the POTW standards and provide the Department specific assurances that these standards will always be met.
- 3. 12-14 shows a sludge dryer. We would like to see specifications on the dryer including the dryer's emissions control equipment.
 - 4. Pages 12-3 to 12-5 should talk about maintaining freeboard on open vessels like the sump and drip tray as shown in page K-4.

mu

5. 7-4 states emissions will be vented through scrubbers. DWG-K-4 shows only 1 scrubber. Whatever the case may be, the application should consistently address the correct number of scrubbers.
6. Pursuant to §264.15(b)(3), checklists should have provisions to inspect critical operating parameters for the sludge dryer and scrubbers.
7. Pursuant to §264.195, we would like to see schedule checks on all free vents and relief vents; and also on the belt press drip pan and the sump located after the drip pan. There was also some discussion during the 1/5 meeting about installing carbon adsorption systems for controlling emissions from organic storage tanks. We would also like to see schedule checks on all carbon systems. A detailed description of the carbon system should be included in Chapter 1 or 12. Include equipment specs. about the system. The specs should include a manufacturer's guarantee on control efficiency for VOC's. The flow diagram should also be revised to include the proposed installation of all carbon systems.
8. 9.2.5 states spills from overhead piping is highly unlikely because there are no valves, joints, etc.. As discussed at the meeting, please reword this such that leaks from overhead piping are readily detectable and have secondary containment.

Containers

9. 12-14 shows an area for storing acid/base treatment chemicals and another area for storing roll-off boxes. Although these are not considered hazardous wastes, we would like these hazardous chemicals stored and handled similar to hazardous wastes. Will tanks be built? Whether they be tanks or containers, we would like you to consider providing secondary containment and containment calculations for the three areas. We would also like some form of scheduled inspection done for these areas.
10. Appendix D states concrete sealants and trough specifications are not being provided with the application. We would like to have this information provided pursuant to §264.175(b)(1). The same rule requires the applicant to address an engineering evaluation of base structural integrity. Chapter 11 does not appear to address this.
11. Is there any type of proposed or existing railcar storage at the facility? If so, the application must address this. Are there any railroad tracks?

JAN - 9 1990

12. The certified land surveyor's map A-2 indicates the containers may be 48'8" from the fence line. §264.176 requires a 50 ft. setback. Please clarify any misunderstanding or correct this discrepancy.

SWMU's

13. Item 1, page G-13 states there are 10 RCRA permitted fuel blend storage tanks. Please specify which 10 they are. Permit HO53-86011 describes them as only 10-6800 gal. tanks. The same item also calls the container storage building a SWMU. Department staff feel that the building is a housing structure providing a roof over a number of SWMU's. Please identify what possible SWMU's are located under the roof. Same item also calls "distillation equipment" as SWMU's. Please specify which equipment has the potential to be considered as SWMU's.
14. Item 3, page G-13 states there are no releases from existing SWMU's. There appear to be releases into the atmosphere; i.e. air releases from storage tank vents, (T-111, T-112, T-114), from receiving hoppers of sludge mix tanks and fuel blending tanks, from a Laminar flow booth (M-127), from an inclined tray (M-121), shredder hopper (M-122), vacuum still (S-101), thin film evaporator (H-201), distillation column (F-302), from a knockout drum which serves 3 relief valves (please identify the purpose of the 3 valves) etc. Your response to item 3, G-13 must address not only liquid releases but also air releases pursuant to Sections 3004(n) and 3005(c)(3) of RCRA and 40 CFR 264.601(c).
15. Pursuant to 40 CFR 264.601(c), SWMU's must be operated in a manner to ensure protection of human health and the environment. Protection for the environment includes prevention of any release that may have adverse effects on human health or the environment due to migration of waste constituents in the air. Seven issues must be addressed to ensure such protection. These issues are described in 40 CFR 264.601(c)(1) to (7). You must address these issues in writing and incorporate them in the part B application. Releases from RCRA units proposed to be constructed should be included in the analysis.

Further processing of your application is temporarily held in abeyance pending receipt of your complete response to this letter. Please submit them no later than February 19, 1990.

Mr. James Lederer
Tricil Recovery Services, Inc.

JAN - 9 1990

Page Seven

Thank you for your cooperation. If you have any questions, please call me at (813) 623-5561, extension 390.

Sincerely,



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

VSA/ab

cc: James Scarbrough, P.E., EPA Region IV
Satish Kastury, BWP&R
Bill Thomas, P.E., SWDER-Air
Bill Crawford, SWDER-Waste Management

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

DISTRICT ROUTING SLIP

TO: Victor San Agustin

DATE: 1/5/90

CC:
TO:

	PENSACOLA	Northwest District							
	PANAMA CITY	Northwest District Branch Office							
	TALLAHASSEE	Northwest District Branch Office							
X	TAMPA	Southwest District							
	ORLANDO	Central Florida District							
	MELBOURNE	Central Florida District Branch Office							
	JACKSONVILLE	Northeast District							
	GAINESVILLE	Northeast District Branch Office							
	FORT MYERS	South Florida District							
	PUNTA GORDA	South Florida District Branch Office							
	MARATHON	South Florida District Branch Office							
	WEST PALM BEACH	Southeast Florida District							
	PORT ST. LUCIE	Southeast Florida District Branch Office							
<table border="0"><tr><td>Reply Optional <input type="checkbox"/></td><td>Reply Required <input type="checkbox"/></td><td>Info Only <input type="checkbox"/></td></tr><tr><td>Date Due: _____</td><td>Date Due: _____</td><td></td></tr></table>				Reply Optional <input type="checkbox"/>	Reply Required <input type="checkbox"/>	Info Only <input type="checkbox"/>	Date Due: _____	Date Due: _____	
Reply Optional <input type="checkbox"/>	Reply Required <input type="checkbox"/>	Info Only <input type="checkbox"/>							
Date Due: _____	Date Due: _____								

COMMENTS:

The attached letter refers to the authority a permit writer has to enforce the protection of the environment with additional permit conditions. The memo references emissions from hazardous waste incinerators, but this can also be used in Tricils permit.

Bill Nermies

Sunco 278-0300

FROM:

TEL:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 27 1989
D. E. R.

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

JAN 8 1990

MEMORANDUM

SOUTHWEST DISTRICT
TAMPA

SUBJECT: Use of Omnibus Authority to Control Emissions of Metals, HCl, and PICs from Hazardous Waste Incinerators

FROM: Sylvia K. Lowrance, Director *Sylvia K. Lowrance*
Office of Solid Waste

TO: Hazardous Waste Division Directors, Regions I-X

Questions have recurred regarding the implementation under omnibus authority of the forthcoming proposed amendments to the hazardous waste incinerator standards, and the relationship between implementing the controls and meeting the November 8, 1989, permitting deadline. This memorandum provides OSW's policy on these issues.

We are concerned that the existing standards for hazardous waste incinerators under 40 CFR 264.340 may not be fully protective for all facilities with respect to emissions of toxic metals, hydrogen chloride (HCl) and products of incomplete combustion (PICs). We have developed proposed amendments to the standards to better address the hazards posed by these emissions. The proposed rules have completed the internal Agency review process and are under review by the Office of Management and Budget. We anticipate that the proposed rules will be published for public comment in the spring of 1989.

In the interim, until the rules are promulgated, EPA permit writers should use the authority provided under Section 3005(c)(3) of the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), to apply additional permit conditions as necessary to adequately control these emissions. This provision, often called the "omnibus" authority, gives permit writers the authority to apply additional permit conditions as necessary to adequately protect human health and the environment. Thus, EPA permit writers have the authority and the responsibility to consider, on a case-by-case basis during the permit process, whether controls based on the current regulations are fully protective, and, if not, to establish additional permit conditions as necessary to protect human health and the environment.

The use of the omnibus authority is clearly within the initial intent of Congress in including the omnibus provision in the statute, as evidenced by the legislative history at S. Rep No. 284, 98th Cong., 1st Sess. 31 (1983), which states:

"[the omnibus authority] can also be used to incorporate new or better technologies or other new requirements in permits, where EPA intends to add such technologies or requirements to the regulations but has not yet issued a final regulatory amendment."

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 12/21 Subject Plant Visit @ Tricil
Time 3:00 PM Permit No. HC53-170970
County POLK
Mr. Steve Taylor Telephone No. (813) 533-6111
Representing _____

[] Phoned Me [☒] Was Called [] Scheduled Meeting [] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting None

Summary of Conversation/Meeting Called Steve to schedule a plant visit/meeting at his facility. We initially scheduled it for 12/27. We both have no problems w/ it.

Steve called the following day. Said he'll be the only one at the plant. He would like the Plant Mgr. and engineers from Toronto to be there to answer question. We then agreed on Jan. 5, 10:00 AM.

(continue on another
sheet, if necessary)

Signature Diana San Agustin
Title PET



D. E. R.

December 18, 1989

DEC 21 1989

Bill Crawford:
Florida Dept. of Environmental Regulation
4520 Oak Fair Blvd.
Tampa, FL 33610

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Crawford:

As you're probably aware, we've submitted a permit application to the Florida Department of Environmental Regulation (DER) for our Bartow Municipal Airport facility. To help you better understand what we do, and how we do it, we've enclosed a brochure that provides a summary of the application.

So you can see our plant for yourself, and so you can ask any questions you may have, we're scheduling several information workshops at the facility just after the first of the year. As soon as dates and times have been confirmed for these workshops, we'll let you know. We hope you'll be able to join us.

After the DER has completed their technical review of our application, they may hold a public hearing. If they do, we'll be sure to let you know and we'd encourage you to come register your comments.

As responsible waste managers, we've been working to protect the environmental security of the region while providing a valuable service to both industry and the general public alike.

We're proud to be a member of the Bartow business community and hope you'll be able to find time to read our information and stop by and see us. We're looking forward to meeting you.

Should you have any questions, please feel free to call me at 533-6111.

Yours very truly,
TRICIL RECOVERY SERVICES INC.

A handwritten signature in dark ink, appearing to read "JW Lederer", is written over the typed name.

James W. Lederer
General Manager

Enclosure

3/89



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

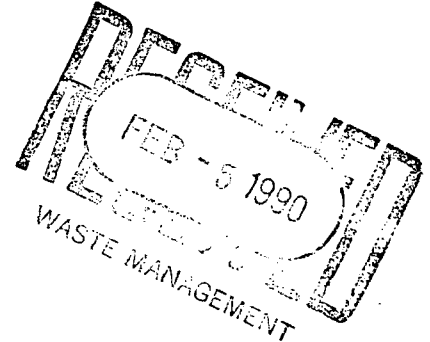
John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

FEBRUARY 5, 1990

CERTIFIED MAIL

Mr. James W. Lederer
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, FL 33830-9504



WARNING NOTICE WN90-0003AP53SWD

Dear Mr. Lederer:

RE: Air Pollution Permits

Pursuant to Florida Statute 403 and the rules and regulations promulgated therein which authorizes and empowers the Department of Environmental Regulation to control, abate and prohibit pollution of air and water in the state of Florida, you are hereby notified of specific violations of these rules and regulations as follows:

The inspections conducted on August 22, 1989 and January 24, 1990 revealed that Tricil operates three mixers and a grinder in the fuel blending area. In addition, Tricil operates a freon washer in the solvent processing area. The operation of a non-exempt source of air pollution without the Department permit is a violation of Rules 17-2.210 and 17-4.030. Failure to comply with the Department rules is also a violation of Section 403.161, Florida Statutes.

This Notice is to advise you of the possible penalties for violations of Department regulations. These include judicial imposition of a civil penalty and/or criminal penalties pursuant to Sections 403.141 and 403.161, Florida Statutes.

You are requested to contact Mr. Viet Ta of the Air Compliance and Enforcement Section at (813) 623-5561, extension 342, within 10 days from receipt of this notice, to set a time and date for an informal conference to be held at this office. The purpose of this meeting will be the resolution and settlement

Mr. James W. Lederer
Bartow, FL

Page Two

of the above violation. In addition, you are requested to respond, in writing, within ten days (10) from receipt of this notice detailing your plans to comply with the cited statutes and/or rules.

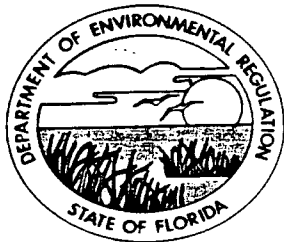
Sincerely,



Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/vts

cc: David Thulman, OGC
Rick Vail, DARM
Victor San Agustin, HW ✓



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

February 16, 1990

Mr. James W. Lederer
Tricil Recovery Services, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: Air Pollution Permits for Additional
New Hazardous Waste Treatment and Storage

Dear Mr. Lederer:

The Air Section of the Department of Environmental Regulation, being aware of Tricil's application for a Construction Permit to expand the Hazardous Waste Treatment and Storage capabilities at the Bartow facility (DER File #HC53-170970), hereby informs Tricil that Air Construction Permits are required for all new and modified air pollution sources.

An application for a waste permit does not relieve the applicant from compliance with the Department rules regarding applications for air pollution source construction permits.

Sincerely,

Gary A. Maier, BSChE, JD

copy to: J. Harry Kerns
Viet Ta

DEC 14 1989

DECEMBER 4, 1989

Laidlaw sets \$205M purchase of Canada's Tricil Ltd.

By Mike Henley
Staff Writer

BURLINGTON, Ontario — Laidlaw Transportation Ltd. said it plans to buy Tricil Ltd. this month for about \$205 million from Trimac Ltd., a Calgary, Alberta, transportation and energy business. The acquisition will make Laidlaw the second largest chemical waste management company in North America, behind Chemical Waste Management Inc., a Laidlaw official said.

Tricil, of Mississauga, Ontario, has chemical waste and solid waste operations in Canada and the U.S. More than half of its business involves chemical waste, said T.A.G. Watson, a Tricil spokesperson.

Tricil operates a chemical waste landfill near Sarnia, Ontario, and has a commercial hazardous waste incinerator each in Quebec and Ontario. In the U.S., the company is the primary

remediation contractor for the U.S. Environmental Protection Agency at Superfund sites in Tyngsboro and Ashland, Mass., Mr. Watson said.

Tricil's solid waste management interests include a waste hauling business that operates primarily in Canada, a solid waste landfill in upstate New York, and two waste-to-energy plants

in Canada.

Laidlaw plans to merge its solid waste businesses with Tricil's, said Ivan Cairns, Laidlaw vice president and general counsel. The chemical waste operations will be combined into Laidlaw businesses in Canada and its U.S. subsidiary, GSX Chemical Services Inc., he added.

The Tricil sale is contingent on finalization by Trimac of the purchase of the 50 percent of Tricil it does not own from C-I-L Inc., a subsidiary of Imperial Chemical Industries PLC, of Britain. That deal was expected to be completed in time for the Trimac-Laidlaw agreement to be consummated this month.

AERT goes public, Western Waste plans offer

Advanced Environmental Recycling Technologies Inc. (AERT) went public last month offering \$5 million worth of common shares and warrants.

Separately last month, Western Waste Industries filed plans for a secondary offering of nearly 1.3 million shares.

AERT, of Springdale, Ark., sold 1.25

million units at \$4 each through underwriter D.H. Blair & Co. Inc. The units, which consist of three common shares and three warrants, trade on NASDAQ under the symbol "AERTU."

After underwriting expenses, AERT received \$4.5 million, said Vincent Coakley, D.H. Blair syndicate manager. The company will use \$1.45 million of the proceeds to buy equipment, while more than \$1 million will go to repay debt.

AERT, a start-up firm, is developing a composite building material, Bioplaste, made from waste plastic and wood fiber. The product will be marketed to the building industry as an alternative to wood.

Western Waste Industries, a solid waste disposal company, filed with the U.S. Securities and Exchange Commission for a secondary stock offering of nearly 1.3 million shares.

The Western Waste offering plan, filed last month with the U.S. Securities & Exchange Commission, calls for the company to sell 1 million shares of com-

mon stock.

Individual shareholders will offer another 267,000 shares. The offering is expected to begin this month, said Walter Fitzgerald, a senior vice president at Chicago Corp., one of the managers of the underwriting.

The offering price had not been set at press time but will reflect the market price of Western Waste stock at the time SEC approves the sale. Based on a Nov. 16 closing bid price of \$28.75, the stock sale would reap about \$36.4 million, of which more than \$7 million would go to the selling shareholders.

Western Waste will use the proceeds to repay debt, Mr. Fitzgerald said.

Principal selling stockowners include chairman Kosti Shirvanian, 125,000 shares; vice president Hacob Shirvanian, 100,000 shares; executive vice president Savey Tufenkian, 25,000 shares; and vice president Bernard Nash, 3,690 shares.

Dean Witter Reynolds Inc., Chicago Corp. and Robertson Stephens & Co. are managing the underwriting.

Providing
Effective Solutions
for your
environmental needs

On-site treatment

Groundwater cleanup

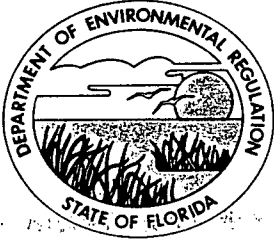
Petro-Tite™ Underground
Tank Testing

Whether you inherit a waste problem or are facing a cleanup of your own, MAECORP has the technology and experience to handle urgent hazardous waste situations.

MAECORP

312-372-3300

wTe huvs polystyrene recycler



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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB - 9 1990

Thermal Oxidation Corp.
Attn: Richard Familia
Post Office Box 306
Roeberch, South Carolina 29376

WARNING NOTICE #WN90-0003HW53SWD
FLD #980 729 610

RE: Class I Hazardous Waste Violations
Tricil Recovery Services, Polk County

Dear Mr. Familia:

A hazardous waste compliance inspection was conducted at your facility on November 11, 1989. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 Code of Federal Regulations Parts 260 to 268, adopted in Chapter 17-730, Florida Administrative Code.

During the inspection violations of rules regarding hazardous waste management were noted. These violations are set forth in the "Summary of Violations" section of the attached inspection report.

You are advised to immediately cease all operations contributing to violations of the cited statutes and regulations. You are further advised that you may be held liable for any damages occurring to the resources of the State and for the restoration of those resources to their original condition.

This matter may be resolved through the entry of a Consent Order which includes a compliance schedule and an appropriate penalty. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 120 days of the date of the attached inspection report. In order to avoid the issuance of an NOV a Consent Order must be entered into well in advance of that date.


FEB - 9 1990

Thermal Oxidation Co.,
Warning Notice #WN90-0003HW53SWD

Page Two

In accordance with the RCRA Civil Penalty Policy of May 8, 1984, the penalties assessed in this case are \$24,197.80. Please contact Edith R. Morales of this office within 10 calendar days of receipt of this Notice to discuss a resolution of this matter.

Sincerely,



Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

Attachment

RDG/emr

cc: Victor San Agustin ✓
Don Trussell, BWP&R
James Scarbrough, USEPA, Region IV
Compliance File
Barbara Hamilton, GSX Services
Steven J. Taylor, Tricil



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

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ☒ ROUTINE FOLLOW-UP PERMITTING

FACILITY NAME Tricil Recovery Services DER/EPA ID FLD 980 729 610

ADDRESS Route 3, Box 249, Bartow, Florida 33830

COUNTY Polk Phone(813) 533-6111 DATE 11/29/89 TIME 4:45 p.m.

TYPE OF FACILITY:

Generator
 Small Quantity
☒ Generator

Storage
☒ Container
☒ Tank
 Waste Pile
 Surface Impoundment

Transporter
 Transporter

Disposal
 Landfill
 Surface Impoundment
 Waste Pile

Treatment
 Tank
 Land Treatment
 Thermal
 Chem/Phys/Bio.
 Incinerator
 Surface Impdmt.

2. Applicable Regulations:

☒ 40 CFR 262 40 CFR 263 ☒ 40 CFR 264 40 CFR 265

3. Responsible Official: (Name & Title)

Richard Familia - Vice President

4. Survey Participants & Principal Inspector

James Lederer - Tricil
Steven J Taylor - Tricil
Edith R. Morales - FDER

5. Facility Latitude:

27°57'05"

Longitude:

81°47'09"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: H053-860111 Date Issued: 11/6/88 Expiration Date: 11/6/90

8) PROCESS DESCRIPTION:

Tricil Recovery Services in Bartow, Florida, has notified EPA that the facility would accept Superfund waste. Tricil currently operates drum and tank storage units used in conjunction with the facility's solvent reclamation and hazardous waste fuel blending programs. The facility uses vacuum distillation, thin film evaporation and a fractionating column to reclaim and purify solvents according to customer specifications.

When hazardous wastes are brought on-site, a sample is taken for a "fingerprint" type analysis to compare to the waste profile provided by the generator. Once the waste identity is confirmed, the facility will categorize the waste according to the expected use of the material -- fuel or recycling. Tankers are emptied into one of the facility's 10 storage tanks. Drums are marked with the date the waste is accepted and with a two letter use code and put into the drum storage area. A significant amount of drums were stored in such a way that inspection was obstructed, making it difficult to observe the accumulation start date on land ban regulated wastes. Wastes assigned to the hazardous waste fuel's program are required to have a minimum of 50,000 BTU/gallon. Various process wastes, such as still bottoms are also added to the fuel blend for disposal, provided the final BTU is not lowered below acceptable limits.

Drums of liquid wastes can be pumped directly into the storage tanks or recycling system. Drums containing solids are emptied into a grinder prior to being pumped to a tank. The specifications for the hazardous waste fuel require the material to pass through a 1/8 inch screen. Solids that won't fit into the grinder are placed in one of 3 flat metal pans to be broken down.

The pans and grinder are located within the secondary containment of the drum storage building. The facility has applied for a permit modification to bring in heavier equipment and increases the efficiency of the program. Currently, waste floor dry, gloves and other trash are drummed for on-site storage as "tramp material". Tricil claims this material has fuel value and can be processed by the new heavy duty grinders.

The grinder has a filter to prevent oversized solids from entering the fuel tanks. The filters are removed and washed in solvent periodically, and oversize solids are collected for re-grinding.

Drums of waste are stored on pallets in the container storage building. The storage building was filled to capacity and more than 100 drums were observed stored outside of the storage area. Some drums were observed with fresh pin hole leaks. Some of the pallets and the floor show evidence of fresh leaks. The facility operating record and other records were complete and in compliance.

8) PROCESS DESCRIPTION: (cont'd)

A hose from a tank holding toluene was leaking, a violation of 40 CFR 264.31. At the time of the inspection, there were approximately 1,000,000 cases of mustard gas received from the military to be handled as non-regulated waste.

Tricil is in compliance with 40 CFR 268.7 record keeping requirements regarding wastes received by the facility. The facility is in compliance with 40 CFR 268.7(b) and 40 CFR 268.32(j)(1) for analyzing hazardous waste fuel being shipped off-site. The present waste analysis plan is based on the product and process knowledge. Tricil does not accept waste containing metals or cyanides. However, halogenated organic constituents are accepted. Tricil's waste fuel contains still bottoms from the recovery of chlorinated solvents. Tricil is also permitted to handle the following first third "soft hammer" wastes: U019, U044, U077, U159, U210, U211, U220, U228, and U238, plus second third wastes U002, U057, and U161. Periodically, Tricil tests the shipments of hazardous waste fuels for 40 CFR 268 standards. The facilities receiving the waste fuel do analysis for 40 CFR 268 standards and for their permit standards prior to burning the fuel.

Although Tricil does provide its designated facilities with notice that waste is restricted from land disposal, the appropriate treatment standards are not indicated. Tricil identifies its waste as F003 and F005, but does not otherwise indicate what constituents are in the waste stream, or whether the applicable treatment standard is wastewater. However, all wastes from the facility are disposed of as fuel. These violations were noted in the previous inspection, and were referred to USEPA, Region IV.

9) SUMMARY OF VIOLATIONS:

40 CFR 268.7(1)(ii)* The notice provided by Tricil to its designated facilities does not include the specific corresponding treatment standards or all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

40 CFR 264.31 Facility allowed a release of toluene, a hazardous constituent from a leaking hose.

40 CFR 264.171 Containers holding hazardous waste were not in good condition.

40 CFR 264.173(b) Containers holding hazardous waste were found to be leaking.

Tricil Recovery Services
FLD 980 729 610

9) SUMMARY OF VIOLATIONS: (Cont'd)

403.727(1)(c) Facility was storing containers holding hazardous waste outside of the storage building and storing over the limit. Facility is not storing wastes according to its permit.

* Referred to USEPA, Region IV

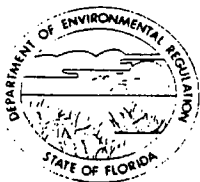
Inspected: Edith R. Morales

Edith R. Morales
Environmental Specialist I

Approved: Elizabeth Knauss

Elizabeth Knauss
Environmental Supervisor I

Date 2/8/90



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <input checked="" type="checkbox"/>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Bill Neimes, P.E.
THRU: Satish Kastury
FROM: Victor San Agustin, P.E.
DATE: December 5, 1989

VSA

HC53-170970

A, 3-C

SUBJECT: Revisions to Tricil Recovery's Part B Application

This memo is to submit to you some changes which the applicant made to the application.

Enclosed are changes to Appendix L - Certificate of Liability Insurance and Appendix E - Closure Cost Estimate and Letter of Credit. Please replace the pages as described in the enclosed cover letter from Tricil.

VSA/ab
Enclosures

cc: Bill Crawford, SWDER ✓

WASTE STORAGE

Tricil is also applying for permission to temporarily store certain wastes that cannot be reclaimed, blended into fuels or treated on site.

These wastes will be analyzed upon arrival and matched with compatible wastes. They will then be stored in the drum processing building until they can be transported off site to an approved facility for treatment, incineration or disposal.

SAFETY PRECAUTIONS

The safety of the environment, community and employees is our main priority. Therefore, loading and unloading docks, the processing area, storage areas and all other portions of the Tricil facility are designed and constructed to maximize the safe handling of waste materials.

All roadways and processing areas are surrounded by a concrete curb and sloped to prevent any wastes from leaving the property in the unlikely event of a spill. Loading and unloading docks are also curbed.

The safety of the environment, community and employees is our main priority.

Wastes are transferred from one area to another through a network of overhead pipes. As a safety precaution, none of the piping at the facility is below ground.

Rain water falling on the concrete portions of the processing area is collected by containment drains, analyzed, and if necessary, treated before being discharged into the sewer.

The walls and roof of the drum processing building are constructed of aluminum to help keep rain out. The floors of the storage areas and tank farms are constructed of reinforced concrete and coated with a sealant to help prevent any liquids from seeping into the ground.

Two foam stations, equipped with high-pressure water cannons, are located adjacent to the process area. These stations can reach any portion of the facility and are designed for maximum fire protection.

Regular inspections are conducted to detect possible malfunctions, deterioration, operator errors or discharges. Tanks are inspected daily to check for leaks and corrosion. Docks are also inspected daily for potential spills. Container storage areas and their containment systems are checked weekly to ensure that containers are not deteriorating. Emergency and safety equipment is inspected regularly. And, all portions of the facility receive a thorough annual inspection.

CONTINGENCY PLAN

A comprehensive set of contingency plans are in place to enable quick and effective response to any emergency situation. These plans include detailed procedures to be followed in the unlikely event of a fire, spill or other emergency situation at the facility.

Emergency coordinators are designated and specific steps to be followed during an emergency are outlined. Information on facility operations and the characteristics of the materials to be handled are provided to local emergency response agencies.

PERSONNEL

The Tricil Recovery Services Inc. facility employs approximately 50 people. All of these employees receive special training relating to their specific job functions, health and safety measures and emergency response procedures. This training utilizes both classroom and hands-on techniques and is supervised by a qualified training director experienced in hazardous waste management procedures.

All employees receive special training relating health and safety measures.

SECURITY

Site security measures are in place at all times. The entire facility is enclosed by a six-foot, chain link fence with access controlled by an electrically operated gate. The gate is normally closed and only authorized vehicles are permitted to enter the site. Two 12-foot double gates, located on the west side of the facility, provide access for emergency vehicles in case the main entrance is blocked.

A security guard remains on the premises during non-working hours, and the entire Bartow Municipal Airport Industrial Park is also fenced and has a full-time security patrol.



Tricil Recovery Services Inc.
Bartow Municipal Airport, 170 Avenue D North, Route 3, Box 249, Bartow, Florida 33830-9504
Printed in USA 1M 910

1567172 ①

■ A summary of the application for an operating permit for Tricil Recovery Services Inc.

SOUND SOLUTIONS FOR ENVIRONMENTAL SECURITY

Tricil Recovery Services Inc. has submitted an application to the Florida Department of Environmental

Regulation for a Part B permit to continue operating its waste management facility in Bartow, Florida. The application itself contains hundreds of pages of text and drawings. This summary has been prepared by Tricil for the convenience of the local community and any other interested parties. For information on any aspect of the application, please contact Mr. James W. Lederer, general manager, at the Bartow facility, Bartow Municipal Airport, 170 Avenue D North, Route 3, Box 249, Bartow, Florida 33830-9504, (813) 533-6111.

■ How do we benefit the area?

The need to protect our environment has never been so pressing. Technological and industrial advances have improved our quality of life and raised the standard of living in the United States to its highest point ever. Those same advances, however, have also resulted in a growing volume of unwanted industrial by-products—some of which are commonly referred to as hazardous wastes.

While most people prefer to believe that hazardous wastes are some exotic mixture of poisonous chemicals, in reality they are the "table scraps" of our industrial success. Many hazardous wastes can be found right in your own home—things like paint and paint thinners, insect and weed control chemicals, certain used oils, engine coolants and cleaning solvents. In large quantities, these materials pose a threat to our natural environment if not properly managed.

The need to protect our environment has never been so pressing.

We at Tricil Recovery Services Inc. are dedicated to protecting the region from such a threat. We do this by cleaning dirty solvents, stripping them of impurities and producing a high quality, reclaimed product for reuse in the market place. We also blend together non-reclaimable solvents into alternative fuels for burning in industrial furnaces.

The waste management practices employed by Tricil Recovery Services Inc. benefit local businesses and the community alike. By having a readily available, professionally operated waste management facility in the area, the risk to the environment from mismanaged wastes will surely be reduced.

Without facilities like the one in Bartow, industries using solvents would be forced to ship their wastes to approved facilities for incineration. That would not only be costly, but the number of permitted hazardous waste incinerators is small and their capacities limited.

The recycling services offered by Tricil give industries an option—preserving the quality of the environment while utilizing a cost-effective method to manage their waste solvents.



Tricil has contributed to the environmental security of the region since its opening in April 1987. During that time, the facility has helped manage portions of the more than 80 million pounds of hazardous waste generated in the five-county central Florida area.

As a member of the corporate community, we contribute our fair share to the local tax base through property taxes, while helping the economy through the continuation of more than 50 jobs and the purchasing of goods and services.

As with other facilities handling hazardous waste, the Bartow plant is regulated by both the U.S. Environmental Protection Agency and the Florida Department of Environmental Regulation. Both of these agencies serve as overseers of the public interest to ensure the facility complies with applicable federal and state environmental

Tricil has contributed to the environmental security of the region since its opening in April 1987.

regulations. The stringent regulations set by these agencies have been developed to protect the environment, both now and in the future. This application procedure ensures the integrity of that process.

What do we do?

Tricil Recovery Services Inc. operates one of the most advanced waste management facilities in the southeastern United States.

Specializing in the recycling and recovery of industrial solvents, Tricil's process minimizes waste disposal, conserves energy resources, and provides a reclaimed product for reuse in the marketplace.

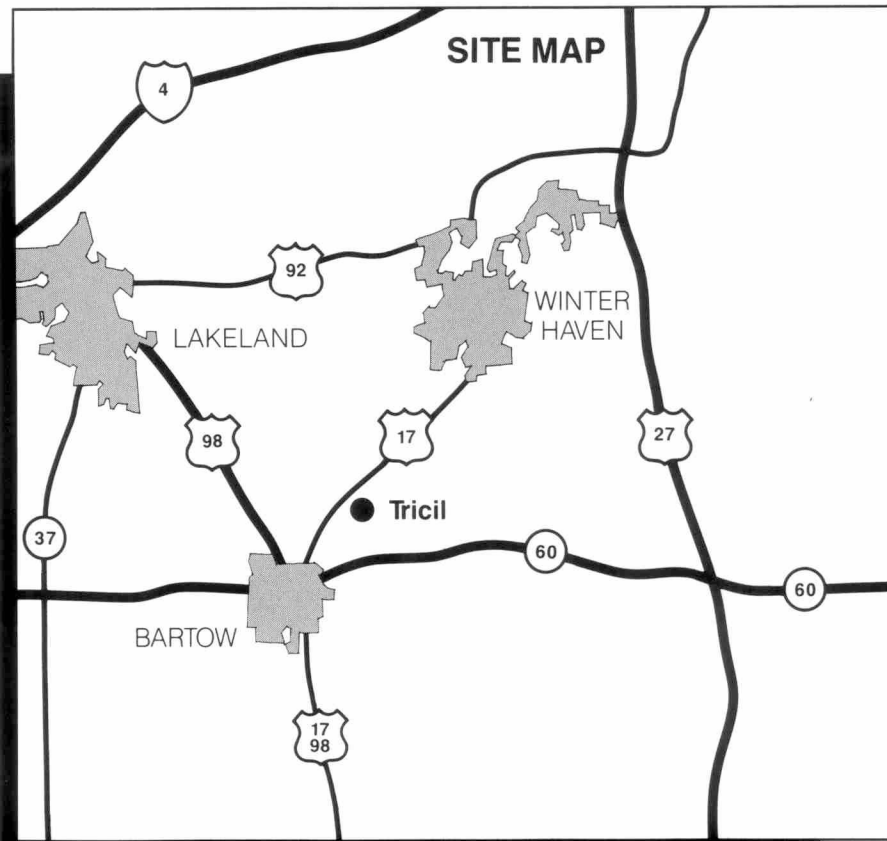


Figure 1

Some waste solvents and chemicals are not suited for recovery and reuse. To safely manage these wastes, Tricil provides a fuels blending program for their disposal. Waste liquids, sludges, semi-solids and solids are prepared and shipped as a liquid fuel to approved industrial furnaces for energy recovery and destruction.

For 16 years, Tricil companies have been providing sound solutions to waste management problems.

Where are we located?

Tricil Recovery Services Inc. is located in Polk County, off U.S. Highway 17, on 10 acres of land leased from the Bartow Municipal Airport Development Authority. The Authority, with 400 acres available for industrial development, is currently host to about 20 different manufacturing and services companies.

Who are we?

The Tricil group of affiliated companies was created in 1973 to bring an increased level of expertise to the protection of North America's natural environment.

For 16 years, these companies have been providing sound solutions to waste management problems faced by households, businesses, industries and government.

As a Tricil affiliated company, Tricil Recovery Services Inc. is part of a waste management network of some 1,600 employees serving North America from more than 45 locations.

Application highlights

Tricil wishes to serve its clients, such as those in the electroplating and electronics industries, more fully by accepting both organic and inorganic (metal containing) wastes. We also hope to serve local industries better by accepting industrial wastewaters in small quantities like 55 gallon drums. Currently, most other waste management facilities in the state of Florida accept only bulk shipments of hazardous wastewaters, which poses an inconvenience for small quantity waste generators.

WASTE RECEIVING AND ANALYSIS

Before any waste is accepted for processing at the Bartow facility, samples are submitted for analysis at Tricil's on-site laboratory. Once the waste is analyzed, it is assigned a waste code developed by Tricil. This code acts as a "fingerprint" of the waste and is used to verify its characteristics when an actual shipment arrives at the plant.

Waste samples are submitted for analysis at Tricil's on-site laboratory.

Wastes, transported by permitted hazardous waste transporters, arrive at the facility in either 55 gallon drums or in bulk. Samples of all incoming wastes are analyzed to ensure that they match their preassigned "fingerprints". If the nature of the sample differs from the "fingerprint" data, the shipment is not accepted.

Tricil is currently permitted to accept two general types of waste:

- reclaimable solvents, that can be re-used by industry and include products like nail polish remover and paint thinner, and

- fuel-grade wastes which either contain too many solids to be processed by on-site equipment or have a low recyclable value, including rubbing alcohol, used motor oil and ink solvent from printing presses.

To help additional industries properly manage their wastes, this application is requesting permission to accept two other general types of waste:

- non-reclaimable wastes which cannot be reclaimed but can be treated to neutralize or remove contaminants, such as wastes from electroplating processes, and
- storage only wastes which cannot be treated on site but would be temporarily stored until they can be shipped off site for treatment and disposal.

SOLVENT RECOVERY

Tricil will continue to recover reclaimable solvents. Depending upon the characteristics of the material, recycling is performed in one or more of three processing units—a vacuum still, a thin film evaporator or a 35-sieve-tray fractionation column.

Solvents with small concentrations of solids, such as nail polish remover, are processed in the vacuum still. Using steam, the solvent content of the waste is heated and condensed before being transferred to intermediate storage tanks.

Solvents with greater concentrations of solids, including paint remover and degreasing products, are processed in the thin film evaporator. Here, waste solvents evaporate and are condensed prior to their storage in intermediate tanks. In both processes, remaining impurities are pumped into a bottoms tank for final disposition.

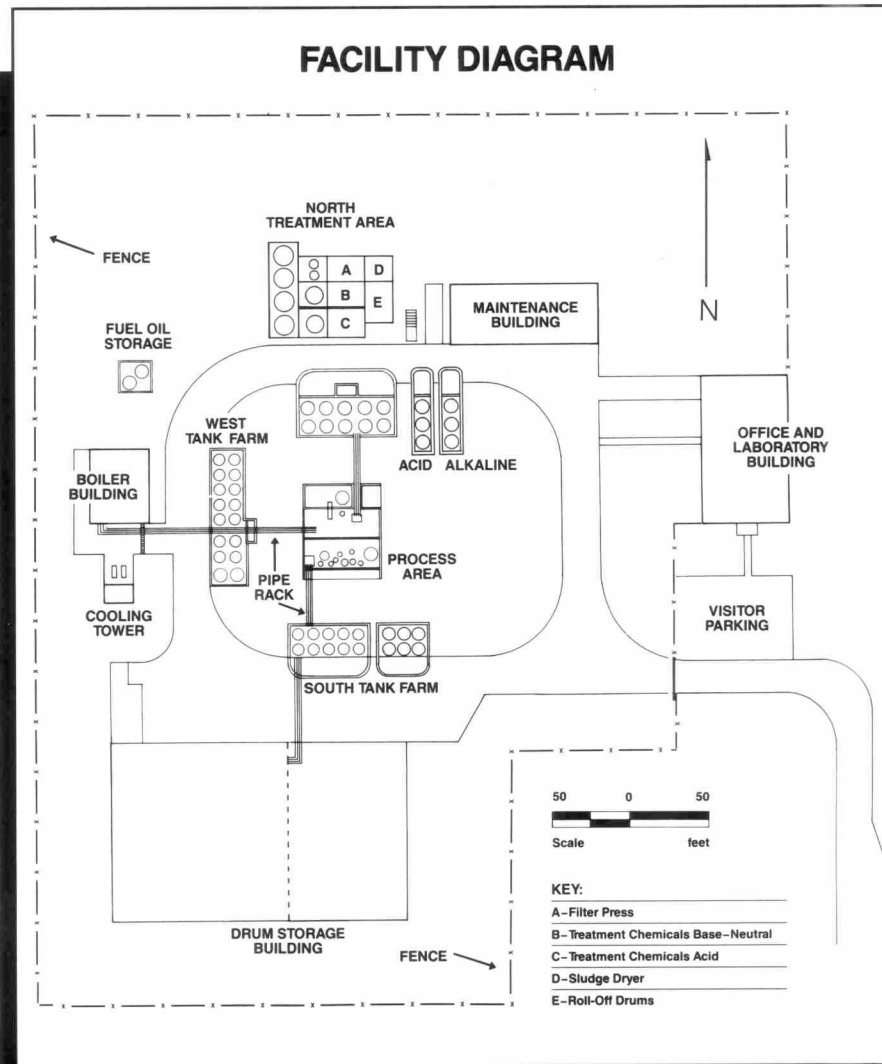


Figure 2

While many of the waste solvents Tricil processes have very technical sounding, scientific names, the products they create are familiar to most all of us. This diagram shows the types of waste solvents Tricil handles at the Bartow plant—their scientific name, their common name, and the percent of total wastes received they represent:

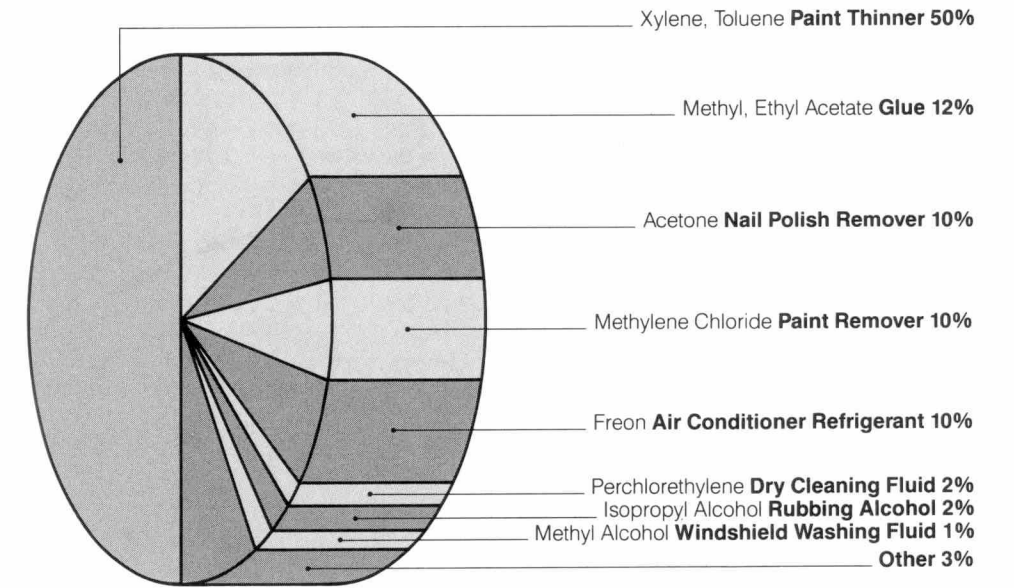


Figure 3

A 62-foot fractionation column is used to process solvents that have no solids content. Because these solvents have already undergone one of the processes previously described, the majority of their impurities have been extracted. After going through the fractionation column, their percentage of impurities will be reduced even further. For example, upon entering the fractionation column, a reclaimed solvent may be 88 percent pure. Once the process is complete, the material will be approximately 99 percent pure.

Solvents that cannot be reclaimed are blended into waste fuels.

FUEL BLENDING

Solvents that cannot be reclaimed, as well as sludges and still bottoms, are blended into waste fuels.

While these non-reclaimable wastes cannot be restored for reuse as solvents, they can be blended together and used as an alternative to natural gas, coal, and other fuels—thereby conserving valuable energy resources. These alternative fuels are burned in industrial furnaces—like cement kilns—that have been approved to use them.

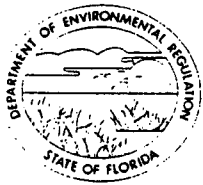
WASTEWATER TREATMENT

To help industries that need to properly manage small quantities of hazardous wastewaters, Tricil is requesting approval to perform neutralization and precipitation at the Bartow site.

In elementary neutralization, acidic and alkaline wastes—like those generated by metal finishing operations—are mixed with each other, and sometimes with additional treatment chemicals, to produce a neutralized, non-hazardous residue.

The precipitation process is used to remove heavy metals—like cadmium and chrome—from industrial wastewaters. These wastewaters are a common byproduct of the electroplating industry. Using chemical reactions, precipitation makes these wastes more solid and impermeable so they can be disposed of safely.

Both neutralized and precipitated wastes are then put through a dewatering process to produce soil-like residue that can be transported off site for landfilling.



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: Bill Neimes, P.E.
THRU: Satish Kastury
FROM: Victor San Agustin, P.E. VSA
DATE: December 5, 1989
SUBJECT: Revisions to Tricil Recovery's Part B Application

This memo is to submit to you some changes which the applicant made to the application.

Enclosed are changes to Appendix L - Certificate of Liability Insurance and Appendix E - Closure Cost Estimate and Letter of Credit. Please replace the pages as described in the enclosed cover letter from Tricil.

VSA/ab
Enclosures

cc: Bill Crawford, SWDER

2/89



VIA CERTIFIED MAIL

D. E. R.

DEC 4 1989

SOUTHWEST DISTRICT
TAMPA

November 30, 1989

Mr. Bill Crawford
Permitting Engineer, Hazardous Waste
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Re: Hazardous Waste Construction Part B Application

Dear Mr. Crawford;

Enclosed please find certification of newspaper
publication of the Notice of Application for a
permit for Hazardous Waste Storage.

Sincerely,
TRICIL RECOVERY SERVICES INC.

A handwritten signature in cursive script that reads "Steve Taylor". The signature is written in dark ink and is positioned above the printed name and title.

Steve Taylor
Safety & Compliance Manager

cc: J.W. Lederer

AT/ST
0263A

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

Case No.....

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Stephen DeWitt, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

.....Notice of Application.....

in the matter of

.....Hazardous Waste Storage.....

in the

Court, was published in said newspaper in the issues of

.....November 11; 1989.....

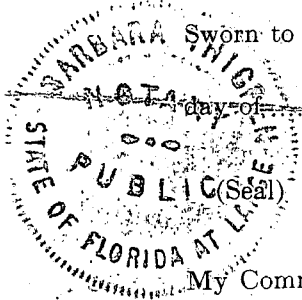
Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed
Controller

Sworn to and subscribed before me this 17th

November A.D. 19 89

.....
Notary Public



My Commission Expires NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: NOV. 11, 1990.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

State of Florida
Department of Environmental Regulation
Notice of Application

The Department announces receipt of an application for permit from Tricell Recovery Services, Inc. to expand by construction a hazardous waste storage and treatment facility. This proposed project will be located at Avenue D North, Bartow Municipal Airport, Bartow, Polk County, Florida 33830.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation, Southwest District Office, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.
K-602 — 11-11-1989

D. E. R.

DEC 4 1989

SOUTHWEST DISTRICT
TAMPA



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

October 10, 1989

James W. Lederer
General Manager
Tricil Recovery Services, Inc.
Route 3, Box 249
Bartow, Florida 33830-9504

A, 3-c

Re: Tricil Recovery Services, Inc., FLD 980 729 610
Construction Permit Application HC53-170970

Dear Mr. Lederer:

In accordance with Florida Administrative Code 17-730.220(6)(a), your facility shall publish the attached Notice of Application in a newspaper of general circulation in the area where the proposed facility will be constructed.

Demonstration of compliance with this requirement shall be provided to the Department by submitted an affidavit of publication of the attached notice.

For any questions, please contact me at (813) 623-5561, ext. 388.

Sincerely,

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

WCC/ab
Attachment

cc: Satish Kastury - DER/Tallahassee w/2 copies of application
James Scarbrough - EPA/Atlanta w/o Attachment

1/89

**State of Florida
Department of Environmental Regulation
Notice of Application**

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