

Thursby, Kim

From: BOSEK, JOHN E <bosek.john@cleanharbors.com>
Sent: Wednesday, March 01, 2017 2:31 PM
To: Epost HWRS (Shared Mailbox)
Subject: RE: Clean Harbors Florida LLC;FLD 980 729 610;First Request for Additional Information (RAI)

Received!

Safety Starts with Me: Live It 3-6-5

John Bosek

Facility General Manager
Clean Harbors Florida LLC
7001 Kilo Avenue
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From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Wednesday, March 01, 2017 2:29 PM
To: BOSEK, JOHN E
Cc: Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; 'Merizalde.carlos@epa.gov'; Knauss, Elizabeth; McBride, Ashanti; Cinquino, Dawn; Desha, David A.; 'childres.james@cleanharbors.com'; Kruchell, Carrie L.
Subject: Clean Harbors Florida LLC;FLD 980 729 610;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

REQUEST FOR ADDITIONAL INFORMATION

March 1, 2017

Mr. John Bosek, Facility General Manager
7001 Kilo Avenue
Bartow, FL 33830
bosek.john@cleanharbors.com

Re: First Request for Additional Information (RAI)

Polk County – Hazardous Waste
Clean Harbors Florida LLC
Facility ID: FLD 980 729 610
DEP Application No.: 64247-HO-017

Dear Mr. Bosek:

Thank you for your application to modify the hazardous waste permit for the above referenced Facility. The Department has assigned DEP Application No. 64247-HO-017 to the application. A Department staff review of the application and supporting documentation submitted on February 21, 2017, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 14 days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Carrie.L.Kruchell@dep.state.fl.us. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Carrie.L.Kruchell@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Carrie L. Kruchell at (850) 245-8765, or by e-mail at

Mr. John Bosek, Facility General Manager
Page 2 of 5
March 1, 2017

Carrie.L.Kruchell@dep.state.fl.us .

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

cc (with attachment):

Brian Bastek, EPA Region 4 – bastek.brian@epa.gov

Carlos Merizalde, EPA Region 4 – Merizalde.carlos@epa.gov

Beth Knauss, DEP Southwest District – elizabeth.knauss@dep.state.fl.us

Ashanti McBride, DEP Headquarters OGC – ashanti.mcbride@dep.state.fl.us

Dawn Cinquino, DEP Headquarters – dawn.cinquino@dep.state.fl.us

David DeSha, Clean Harbors Environmental Services – desha.david@cleanharbors.com

James Childress, Clean Harbors Environmental Services – childress.james@cleanharbors.com

Attached: List of Requested Information

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Facility Name: Clean Harbors Florida LLC
Facility ID: FLD 980 729 610
DEP Application No.: 64247-HO-017

1. Chapter I, Appendix C: I-C-1.1.1 Process Summary – Add in a section detailing “Low Explosives Management”. (This permit modification assumes that Clean Harbors Florida LLC (CHF) will not store, manage or transport any consumer product other than the following: consumer fireworks, flares, emergency signals, marine distress devices and small arms ammunition (not revealed prior to the application being submitted). This permit modification also assumes that CHF will not store, manage or transport any consumer product that is classified as other than DOT 1.4 products, and that all “Low Explosives” fall under two hazardous waste codes: D001 and D003 only.)
2. Chapter I, Appendix C: I-C-1.2 Waste Receiving – Add in a section (I-C-1.2.5) dedicated to “In-Processing of Low Explosives at the Retail Facilities, Prior to Transportation to CHF”. A full understanding of how CHF will identify and treat any UHCs should be included. Additional information regarding when the manifests are signed, when the products are entered into the operating record, and when the products are accepted should be provided.
3. Chapter I, Appendix C: I-C-1.6 Storage of Waste – Amend the capacities for tanks and roll-offs and add in the capacity of the magazine. (It is important to clarify that this modification deletes one permitted roll-off and adds in one magazine. This permit modification also assumes that the North Container Building will no longer house any D001 or D003 materials.)
4. Chapter I, Appendix C: I-C-1.8.1 Magazine Container Storage of Low Explosives –
 - a. Amend the bulleted points to clarify the capacity of the magazine, the exact items intended for temporary storage in the magazine, and all RCRA and DOT waste codes/classifications for those items. (It was noted in the application that other items not previously listed were included, such as “small arms ammunition” and “etc.” Please consider that the Department needs a full understanding of all consumer products that Clean Harbors is wanting to manage/store/transport prior to issuance of the modified permit.)
 - b. Amend the bulleted points to clarify the final transport destination point (e.g., Colfax, LA) and the anticipated form of destruction for each item.
 - c. Include bulleted points that address specific training, security and employee access for the magazine, and provide references to the applicable sections of the application where more details can be found. Discuss the proper PPE employees must wear when entering the magazine.
 - d. Include bulleted points that discuss proper housekeeping of the magazine, and the allowable distance for parking of other vehicles, and other methods that will be utilized to prevent sparking.
 - e. Clarify exactly which of the items contain a “means of self-ignition” and detail

how CHF will prevent accidental ignition.

- f. While the packaging requirements are provided for consumer fireworks and signal flares, the Department would like clarification of how the remaining items (marine distress signals, small arms ammunition, emergency signals, “and etc.”) will be packaged prior to transportation to the facility, and prior to transportation to the final destination point.
5. Chapter II, Section A, Appendix II, F.2 Contingency Plan, 7.0-Response to Explosions – Detail exactly which items will be stored, delete the word “etc.” from this and all other sections of the application, and provide additional details about how each of the items will be stored within the magazine (e.g., fireworks will be stored under water within 5-gallon buckets...).
 6. Chapter II, Section A, Appendix II, F.5 Personnel Training, 1.0, Training Program – Add in a bullet point to provide a detailed overview of the specific training of employees who handle and transport the “Low Explosives”.
 7. Chapter II, Section A, Appendix II, F.5 Personnel Training, 3.0 Job Descriptions: FIELD OPERATIONS – Staff job descriptions and updated training requirements for all involved in the management, handling and/or transportation of “Low Explosives” must be added to this section in either table or text format.
 8. Chapter II, Section A, Appendix II, F.6 Inspections, 3.0 Weekly Inspections – Although no details were provided as far as the frequency of the inspections to be undertaken for the magazine, the Department assumes inspections will take place on a weekly basis just as the roll-offs are inspected weekly. Additional details and/or a separate spreadsheet must be provided listing all aspects of the inspection, e.g., locations both inside and outside of the magazine.
 9. Chapter II, Section A, Appendix II, H. Waste Analysis Plan (WAP), 3.4 Special Wastes – Add a bulleted point describing “Low Explosives stored in onsite magazine”. Since the existing WAP was not revised as part of the application process regarding the new line of service, the Department requests a revision to the WAP stating how CHF will handle the low explosive consumer products. If some of the low explosive consumer products happen to fall outside of the “Special Waste” category, CHF shall revise the applicable sections of the WAP as necessary. Text below the bulleted item should be added to explain how the various low explosives are profiled. The Department assumes that no laboratory analysis will be undertaken for any of the low explosive consumer products, please confirm.
 10. Chapter II, Section B, Containers and Containment Structures for the Storage of Hazardous Waste, 3.0 Container Management Practices – Second paragraph, please change “four” hazardous waste roll-off containers to “three”, and add a sentence about how the magazine takes the place of one of the roll-offs. Add references to other sections of the application as necessary.

11. Chapter II, Section K, Closure Plan, 9.3 Maximum Waste Inventory at Closure – Amend the number of roll-offs, add in the magazine and correct the total gallons of capacity in each. Revise Figure 9 and 9.1 as necessary.
12. Chapter II, Section K, Closure Plan, 9.8.1 Perimeter Road (Staging Area) – Amend this section to discuss the closure for the three (3) remaining roll-offs and the one (1) magazine. Prepare an updated cost estimate for closure to be submitted as a separate document to the Department so that Financial Assurance may be updated as needed.
13. Chapter II, Section K, Closure Plan, Figure 9.1, Maximum Waste Inventory at Closure – Change the title “Roll-Offs/Mixbox” to “Roll-Offs/Solid Waste Mixbox & Magazine”, and then update the number of roll-offs and applicable gallons plus the added magazine and its capacity in gallons. Update the final “Maximum Storage Capacity of Waste at CHF” in gallons.
14. Table of Contents – Update as necessary based upon above comments.
15. Binder Cover – Prepare a new binder cover for the revised application. All edited pages must have “Revision 1” and the date of the revision in the header.