

Knauss, Elizabeth

From: BOSEK, JOHN E <bosek.john@cleanharbors.com>
Sent: Thursday, March 23, 2017 12:44 PM
To: Stewart.RobertG@epa.gov; garcia.javier@epa.gov
Cc: Knauss, Elizabeth; Desha, David A.
Subject: FW: EPA document request
Attachments: BW_CCE_11-4-2011.pdf; Florida - Bartow RCRA closure inflation and renewal (Sept 2016).pdf; Florida - Bartow RCRA closure cert - corrected address (9-26-16).pdf; Florida - Bartow Facility Liability and AST Liability (Nov 2016).pdf; Bartow - EIL and closure nflation approved by DEP.pdf

Mr. Stewart –

Attached please find the requested documentation that was asked for during our recent compliance inspection. Please let me know if I can be of any further assistance. Thank you.

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

John Bosek

Facility General Manager
Clean Harbors Florida LLC
7001 Kilo Avenue
Bartow, FL 33830
(o) 863.519.6331
(c) 863.559.1610
(f) 863.519.6361

bosek.john@cleanharbors.com

www.cleanharbors.com



From: Desha, David A.
Sent: Thursday, March 23, 2017 11:21 AM
To: BOSEK, JOHN E
Subject: RE: EPA document request

John,

Attached is Bartow's closure cost estimate (CCE) from a permit renewal that carried through to the latest renewal – issued by DEP on 10/5/2016. The CCE has been adjusted every year for inflation costs with annual financial assurance (FA) renewals/updates since the CCE was calculated in 2011. There is a pending CCE update as well as an associated FA increase pending with the current permit modification facility response to DEP comments due to be submitted to the Department by 4/21/2017. Once the revised CCE and associated FA is approved by DEP I will ensure Mr. Stewart receives a copy if so desired. That information most likely will not be final for a couple of months.

Also attached is current FA issued to DEP for the facility.

Best regards,

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

David DeSha
Sr. Compliance Manager
Clean Harbors Environmental Services, Inc.
Mobile: 423.413.1218
Email: desha.david@cleanharbors.com
Web: www.cleanharbors.com



From: BOSEK, JOHN E
Sent: Wednesday, March 22, 2017 7:30 PM
To: Desha, David A. <David.Desha@safety-kleen.com>
Subject: EPA document request

David –

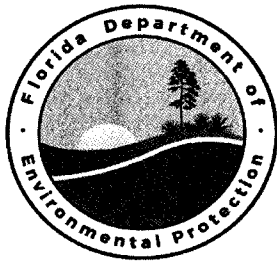
Here is what the EPA folks want as far as the Insurance policies and closure plan / cost estimate. Thanks!

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

John Bosek
Facility General Manager
Clean Harbors Florida LLC
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Bartow, FL 33830
(o) 863.519.6331
(c) 863.559.1610
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From: noreply@cleanharbors.com [<mailto:noreply@cleanharbors.com>]
Sent: Wednesday, March 22, 2017 7:11 PM
To: BOSEK, JOHN E
Subject: Attached Image



Florida Department of Environmental Protection

Rick Scott
Governor

Carlos López-Cantera
Lt. Governor

Bob Martínez Building / MS 4548
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Jonathan P. Steverson
Secretary

Sent Via E-Mail
BellM@CleanHarbors.com

January 15, 2017

Mr. Wallace Bell
Clean Harbors Environmental Services, Inc.
221 Sutton Street
North Andover, Massachusetts 01845-1639

Re: FLD 980 729 610
Clean Harbors Florida, LLC
170 Bartow Municipal Airport
Bartow, Florida 33830-9572

Subject: Financial Responsibility Compliance for 2017

Dear Mr. Bell:

The Department has reviewed the documentation submitted to demonstrate financial responsibility for the above referenced facility. The Indian Harbor Insurance Company certificate of insurance policy number PEC004202403, effective September 6, 2016, indicates an amount of **\$907,525** to cover the inflation adjusted closure cost. In addition, the Indian Harbor Insurance Company certificate of liability insurance policy number PEC004203903 effective November 1, 2016 demonstrates the required coverage for sudden and nonsudden accidental occurrences.

Therefore, Clean Harbors Florida is in compliance with the hazardous waste facility financial responsibility requirements of 40 CFR Part 264 Subpart H, as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact me at 850-245-8793.

Sincerely,

Edgar Echevarría

Edgar Echevarría
Permitting & Compliance Assistance Program
Division of Waste Management

Copy: Stewart.RobertG@EPA.gov
Elizabeth.Knauss@DEP.State.FI.US
FDEP File

Tanks		
Fuels	Cement Kiln	72,600 gallons
Total		72,600 gallons

The following assumptions are used to calculate disposal costs:

- Tank solids and sludges will be slurried and disposed in bulk.
- Wastewater generated is assumed to be RCRA regulated.
- All drums are consolidated into bulk transporters for off-site shipments
- Empty drums will be shipped offsite for reclamation.
- Drums contain 55 gallons and weighs 545 lbs net weight.
- Bulks solid density is 2000 lbs/yd³
- Roll-offs contain 30 yd³
- Tankers contain 6000 gallons
- Wastewater will be loaded directly onto transporters.

Costs for decontamination and disposal of potentially contaminated equipment such as tanks, pipes, valves, pumps, filters, personal protective equipment, brooms, shovels, can crushers, drum scraper, compactor/drum crusher etc. are included in this estimate. Also included are costs for laboratory analyses, utilities, and an independent, registered professional engineer's certification of complete closure.

2.0 Closure Cost Calculation

Costs for each of the steps outlined in the Closure Plan are itemized below. References to section numbers correspond to those in Section K. (**NOTE:** the pressure washing activities will be done using a high pressure machine which conserves water and only 2 gallons per square foot are needed)

SOUTH CONTAINER STORAGE, STAGING, AND LOADING RAMP AREAS	
Steps 1 - 4, 6, & 8 Waste Removal and Disposal (This analysis assumes Step 5 is not possible, therefore Step 7 is not needed.)	
Skilled Laborer - 100 hours @ \$31.00/hour	\$3,100
Supervisor/Inspector - 50 hours @ \$51.50/hour	\$2,575
Off-site disposal - 1,544 fuel drums @ \$24.20/drum (55 gal @	

\$0.44/gal)	\$37,365
Off-site disposal - 400 RCRA solids drums (109 ton) @ \$172.10/ton	\$18,759
Off-site disposal - 4 roll-off containers (40 tons each) @ \$172.10/ton	\$27,536
Steps 9-11; Building Decontamination	
Supervisor - 140 hours @ \$51.50/hour	\$7,210
Skilled Labor - 252 hours @ \$31.00/hour	\$7,812
Skilled Labor - 63 hours @ \$19.00/hour	\$1,197
Pressure washer rental - 252 hours \$860/month (160 hours/month)	\$1,355
Miscellaneous Equipment - \$20	\$20
Detergent - \$170	\$170
Wastewater Transport - 40,500 gallons @ \$0.60/gal	\$24,300
Wastewater Disposal - 40,500 gallons @ \$0.25/gallon (pressure wash 14,000 s.f. @ 2 gals/s.f. and triple rinse 12,500 s.f. @ 1 gal/s.f.)	\$10,125
PPE - \$10/day/person @ 42 days with 2 persons	\$840
Steps 12-14; Rinsate Sampling	
Skilled Labor - 13 samples @ \$22.50/sample	\$293
Sample Analysis - 13 samples @ \$475/sample	\$6,175
Miscellaneous Equipment - \$30	\$30
Sample Shipping - 13 samples @ \$20/sample	\$260
Steps 15-26; Soil Sampling	
Skilled Labor - 14 samples @ \$45/sample	\$630
Sample Drilling - 14 samples @ \$16.40/L.F. @ 1.5 L.F./sample	\$344
Split Spoon Sample Collection - 14 samples @ \$31.00/sample	\$434
Sample Analysis - 14 samples @ \$580/sample	\$8,120

Miscellaneous Equipment - \$40	\$40
Decontamination of Drilling Equipment - 2 days @ \$90/day	\$180
Sample Shipping - 14 samples @ \$20/sample	\$280
Disposal of Drill Cuttings - \$170	\$170
Step 27: Independent Florida PE	\$4,000
TOTAL FOR CLOSURE COST OF SOUTH CONTAINER STORAGE, STAGING, AND LOADING RAMP AREAS	\$163,320
FUELS BLENDING AREA	
Steps 5-6; Equipment Cleaning and Disposal	
Mobilization (included as part of Tanks costs)	\$0
Supervisor - 1 hour @ \$51.50/hour	\$52
Skilled Labor - 3 hours @ \$31/hour	\$93
Pressure Washer Rental - 3 hours @ \$860/month (160 hours/month)	\$16
Tank Removal - 2 tanks @ \$1,284/tank	\$2,568
Equipment Decontamination - 1 day @ \$247/day	\$247
Wastewater Transport - 568 gallons @ \$0.60/gal	\$341
Scrap Steel Transport - \$1.70/mile @ 100 miles/truck for 2 trucks	\$340
Wastewater Disposal - 568 gal @ \$0.25/gallon (pressure wash 284 s.f. @ 2 gals/s.f.)	\$142
Solid Waste/Carbon Steel Disposal (salvaged material)	\$0
PPE \$10/day/person @ 1 day with 3 persons and 1 day with 6 persons.	\$90

Steps 7-9; Fuels Blending Area Decontamination	
Supervisor - 104 hours @ \$51.50/hour	\$5,356
Skilled Labor - 180 hours @ \$31.00/hour	\$5,580
Skilled Labor - 48 hours @ \$19.00/hour	\$912
Pressure Washer Rental - 180 hours @ \$860/month (160 hours/month)	\$968
Miscellaneous Equipment - \$20	\$20
Detergent - \$130	\$130
Wastewater Transport – 28,420 gallons @ \$0.60/gal	\$17,052
Wastewater Disposal - 28,420 gallons @ \$0.25/gallon (pressure wash 9,472 s.f. @ 2 gals/s.f. and triple rinse 9,472 s.f. @ 1 gal/s.f.)	\$7,105
PPE - \$10/day/person @ 36 days with 2 persons	\$720
Steps 10-12; Rinsate Sampling	
Skilled Labor - 8 samples @ \$22.50/sample	\$180
Sample Analysis - 8 samples @ \$475/sample	\$3,800
Miscellaneous Equipment - \$30	\$30
Sample Shipping - 8 samples @ \$20/sample	\$160
Steps 13-23; Soil Sampling	
Skilled Labor - 4 samples @ \$45/sample	\$180
Sample Drilling - 4 samples @ \$16.40/L.F. @ 1.5 L.F./sample	\$98
Split Spoon Sample Collection - 4 samples @ \$31.00/sample	\$124
Sample Analysis - 4 samples @ \$580/sample	\$2,320
Miscellaneous Equipment - \$30	\$30
Decontamination of Drilling Equipment - 1 day @ \$90/day	\$90
Sample Shipping - 4 samples @ \$20/sample	\$80
Disposal of Drill Cuttings - \$170	\$170

Step 24: Independent Florida PE	\$4,000
TOTAL FOR CLOSURE OF THE FUELS BLENDING AREA	\$52,994
NORTH CONTAINER STORAGE, STAGING, AND LOADING RAMP AREAS	
Steps 1 - 4, 6, & 8 waste removal and disposal (This analysis assumes Step 5 is not possible, therefore Step 7 is not needed.)	
Skilled Laborer - 150 hours @ \$31.00/hour	\$4,650
Supervisor/Inspector - 75 hours @ \$51.50/hour	\$3,863
Off-site disposal - 1,930 fuel drums @ \$24.20/drum (55 gallon @ \$0.44/gal)	\$46,706
Off-site disposal – 550 RCRA solids drums (150 tons) @ \$172.10/drum	\$25,815
Steps 9-14; Building Decontamination	
Supervisor - 270 hours @ \$51.50/hour	\$13,905
Skilled labor - 457 hours @ \$31.00/hour	\$14,167
Skilled labor - 116 hours @ \$19.00/hour	\$2,204
Pressure washer rental - 457 hours @ \$860/month (160 hours/month)	\$2,456
Miscellaneous Equipment - \$50	\$50
Detergent - \$313	\$313
Wastewater Transport – 72,780 gallons @ \$0.60/gal	\$43,668
Wastewater Disposal - 72,780 gallons @ \$0.25/gallon (pressure wash 24,844 s.f. @ 2 gals/s.f. and triple rinse 23,100 s.f. @ 1 gal/s.f.)	\$18,195
PPE - \$10/day/person @ 82 days with 2 people/day	\$1,640
Steps 12-14; Rinsate Sampling	
Skilled Labor - 21 samples @ \$22.50/sample	\$473

Sample Analysis - 21 samples @ \$475/sample	\$9,975
Miscellaneous Equipment - \$50	\$50
Sample Shipping - 21 samples @ \$20/sample	\$420
Steps 15-25; Soil Sampling	
Skilled Labor - 16 samples @ \$45/sample	\$720
Sample Drilling - 16 samples @ \$16.40/L.F. @ 4.5 L.F./sample	\$1,181
Split Spoon Sample Collection - 16 samples @ \$31.00/sample	\$496
Sample Analysis 16 samples @ \$580/sample	\$9,280
Miscellaneous Equipment - \$40	\$40
Decontamination of Drilling Equipment - 2 days @ \$90/day	\$180
Sample Shipping -16 samples @ \$20/sample	\$320
Disposal of Drill Cuttings - \$170	\$170
Step 25: Independent Florida PE	\$4,000
TOTAL FOR CLOSURE OF NORTH CONTAINER STORAGE, STAGING, AND LOADING RAMP AREAS	\$204,937
TANKS	
Steps 1-6; Waste Removal and Disposal	
Supervisor/Inspector - 100 hours @ \$51.50/hour	\$5,150
Skilled Laborers - 350 hours @ \$31.00/hour	\$10,850
Transportation & Disposal costs for liquids –72,600 gal @ \$0.44/gal (fuels blending)	\$31,944
Steps 7-8; Tank Cleaning and Disposal	
Mobilization - \$3,500	\$3,500
Supervisor - 36 hours @ \$51.50/hour	\$1,854
Skilled Labor - 71 hours @ \$31/hour	\$2,201
Pressure Washer Rental - 71 hours @ \$860/month (160	\$382

hours/month)	
Tank Removal - 12 tanks @ \$1,284/tank	\$15,408
Equipment Decontamination - 6 days @ \$247/day	\$1,482
Wastewater Transport – 14,912 gallons @ \$0.60/gal	\$8,947
Scrap Steel Transport - \$1.70/mile @ 100 miles/truck and 12 trucks	\$2,040
Wastewater Disposal - 14,912 gal. @ \$0.25/gallon (pressure wash 7,456 s.f. @ 2 gals/s.f.)	\$3,728
Scrap Steel Disposal (salvaged material)	\$0
PPE - \$10/day/person @ 11 days with 2 persons and 6 days with 6 person	\$580
Steps 9-11; Containment Area Decontamination	
Supervisor - 40 hours @ \$51.50/hour	\$2,060
Skilled Labor - 68 hours @ \$31.00/hour	\$2,108
Skilled Labor - 18 hours @ \$19.00/hour	\$342
Pressure Washer Rental - 68 hours @ \$860/month (160 hours/month)	\$366
Miscellaneous Equipment - \$20	\$20
Detergent - \$50	\$50
Wastewater Transport – 10,776 gallons @ \$0.60/gal	\$6,466
Wastewater Disposal - 10,776 gallons @ \$0.25/gallon (pressure wash 3,592 s.f. @ 2 gals/s.f. and triple rinse 3,592 s.f.)	\$2,694
PPE - \$10/day/person @ 12 days with 2 people	\$240
Steps 12-14; Rinsate Sampling	
Skilled Labor - 16 samples @ \$22.50/sample	\$360
Sample Analysis - 16 samples @ \$475/sample	\$7,600
Miscellaneous Equipment - \$30	\$30
Sample Shipping - 16 samples @ \$20/sample	\$320

Steps 15-25; Soil Sampling	
Skilled Labor - 6 samples @ \$45/sample	\$270
Sample Drilling - 6 samples @ \$16.40/LF @ 1.5 L.F./sample	\$148
Split Spoon Sample Collection - 6 samples @ \$31.00/sample	\$186
Sample Analysis - 6 samples @ \$580/sample	\$3,480
Miscellaneous Equipment - \$30	\$30
Decontamination of Drilling Equipment - 1 day @ \$90/day	\$90
Sample shipping - 6 samples @ \$20/sample	\$120
Disposal of Drill Cuttings - \$170.00	\$170
Step 26; Independent Florida PE	\$4,000
TOTAL FOR CLOSURE OF THE TANKS	\$119,216
PERIMETER ROAD (STORAGE AREA)	
Steps 3-5; Decontamination	
Supervisor - 76 hours @ \$51.50/hour	\$3,914
Skilled Labor - 120 hours @ \$31.00/hour	\$3,720
Skilled Labor - 32 hours @ \$19.00/hour	\$608
Pressure Washer Rental - 120 hours @ \$860/month (160 hours/month)	\$645
Miscellaneous Equipment - \$20	\$20
Detergent - \$85	\$85
Wastewater Transport – 18,765 gallons @ \$0.60/gal	\$11,259
Wastewater Disposal - 18,765 gallons @ \$0.25/gallon (pressure wash 6,255 s.f. @ 2 gals/s.f. and triple rinse 6,255 s.f. @ 1 gal/s.f.)	\$4,691
PPE - \$10/day/person @ 21 days with 2 people	\$420
Steps 6-8; Rinsate Sampling	
Skilled Labor - 5 samples @ \$22.50/sample	\$113

Sample Analysis - 5 samples @ \$475/sample	\$2,375
Miscellaneous Equipment - \$30	\$30
Sample Shipping - 5 samples @ \$20/sample	\$100
Steps 9-19; Soil Sampling	
Skilled Labor - 4 samples @ \$45/sample	\$180
Sample Drilling - 4 samples @ \$16.40/L.F. @ 1.5 L.F./sample	\$98
Split Spoon Sample Collection 4 samples @ \$31.00/sample	\$124
Sample Analysis - 4 samples @ \$580/sample	\$2,320
Miscellaneous Equipment - \$30	\$30
Decontamination of Drilling Equipment - 1 day @ \$90/day	\$90
Sample shipping - 4 samples @ \$20/sample	\$80
Disposal of Drill Cuttings - \$170.00	\$170
Step 20; Independent Florida PE	\$4,000
TOTAL FOR PERIMETER ROAD (STORAGE AREA)	\$35,072
PERIMETER ROAD (NON-STORAGE AREA)	
Non-Staging Area Decontamination	
Supervisor - 16 hour @ \$51.50/hour	\$824
Skilled Labor - 29 hours @ \$31.00/hour	\$899
Pressure Washer Rental - 29 hours @ \$860/month (160 hours/month)	\$156
Wastewater Transport – 6,000 gallons @ \$0.60/gal	\$3,600
Wastewater Disposal - 6,000 gallons @ \$0.25/gallon (pressure wash 3,000 s.f. @ 2 gal./s.f.)	\$1,500
PPE 10/day/person @ 5 days with 2 persons	\$100
Non-staging Area Rinsate Sampling	
Skilled labor - 2 samples @ \$22.50/sample	\$45
Sample Analysis - 2 samples @ \$475/sample	\$950

Miscellaneous Equipment - \$30	\$30
Sample Shipping - 2 samples @ \$20/sample	\$40
Independent Florida PE	\$1,500
TOTAL FOR PERIMETER ROAD (NON-STORAGE AREA)	\$9,644
MISCELLANEOUS EQUIPMENT	
Decontamination Skilled Labor - 45 hours @ \$31.00/hour	\$1,395
Supervisor - 20 hours @ \$51.50	\$1,030
Solvent cleaning - 125 gallons of solvent @ \$1.03/gallon	\$129
Disposal of solvent - 125 gallons @ \$24.20/drum (3 drums)	\$73
Disposal of expendable equipment, personal protective equipment, etc. - 100 drums (27 tons) @ \$172.10/ton	\$4,647
Independent Florida PE	\$1,500
TOTAL FOR MISCELLANEOUS EQUIPMENT	\$8,774
TOTAL CLOSURE COST ESTIMATE	\$593,957**

**** FOR THE PURPOSE OF CROSS CHECKING, AND STANDARDIZATION WE HAVE TAKEN OUR ESTIMATES AND RUN THEM THROUGH THE COST PRO PROGRAM AS REQUESTED BY DEP AND BECAUSE IT IS GENERALLY ACCEPTED AS A USEFUL TOOL TO USE AS SUPPORTING DOCUMENTATION FOR ESTIMATED CLOSURE COSTS.**

TOTAL CLOSURE COST ESTIMATE USING COST PRO	\$839,675
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The estimated cost derived from COST PRO will be used for closure cost estimate and certification upon approval.

COST PRO supporting file is presented in Attachment 2 to this section.



Clean Harbors Environmental Services, Inc.
221 Sutton Street
North Andover, MA 01845
978.683.1002
www.cleanharbors.com

VIA FEDERAL EXPRESS (TRN 777782054032)

November 23, 2016

Mr. Edgar Echevarria
Financial Assurance Subsection
Permitting and Compliance Assistance Program
Division of Waste Management
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4548
Tallahassee, FL 32399-2400

**RE: Hazardous Waste Facility Certificate of Liability Insurance and
Storage Tank Certificate of Insurance to Demonstrate Financial Responsibility**
Clean Harbors Florida, LLC
7001 Kilo Drive
Bartow, FL 33830
EPA ID No. FLD980729610

Dear Mr. Echevarria:

Please find enclosed an original signed Hazardous Waste Facility Certificate of Liability Insurance and an original signed Storage Tank Certificate of Insurance to Demonstrate Financial Responsibility, issued by Indian Harbor Insurance Company under policy number PEC0042039, for the Clean Harbors facility located in Bartow. The renewed policy number is PEC004203903 and the renewed policy period is November 1, 2016 – November 1, 2017.

If you have any questions regarding this submittal, please feel free to contact me at bellm@cleanharbors.com or at 978-687-5042.

Sincerely,

A handwritten signature in cursive script that reads "Wallace M. Bell".

Wallace M. Bell
Compliance Manager
Clean Harbors, Inc.

Enclosures

**STATE OF FLORIDA
HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE
(Primary Policy)**

1. Indian Harbor Insurance Company, (the "Insurer"),
Name of Insurer
of 70 Seaview Avenue, Stamford, CT 06902

Address of Insurer

hereby certifies that it has issued liability insurance covering bodily injury and property damage to
Clean Harbors, Inc., (the "Insured"), of

Name of Insured

42 Longwater Drive, Norwell, MA 02061

Address of Insured

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147, as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.). The coverage applies at

<u>EPA/DEP I.D. Number</u>	<u>Name</u>	<u>Address</u>
FLD980729610	Clean Harbors Florida, LLC	7001 Kilo Drive, Bartow, FL 33830

for:

- ☐ sudden accidental occurrences,
☐ non-sudden accidental occurrences,
☒ sudden and non-sudden accidental occurrences.

If coverage is for multiple facilities and the coverage is different for different facilities, indicate which facility(ies) are insured for sudden accidental occurrences, which are insured for non-sudden accidental occurrences, and which are insured for both.

The limits of liability are \$4,000,000 each occurrence and \$8,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number

PEC004203903, issued on November 1, 2016. The effective date of said policy is November 1, 2016.
Date Date

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f), as adopted by reference in Section 62-730.180, F.A.C.
- (c) Whenever requested by the Secretary of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Secretary of the FDEP.
- (e) Any other termination of the insurance (e.g., expiration, non-renewal) will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP.

I hereby certify that the wording of this instrument is substantially identical to the wording specified in 40 CFR 264.151(j), as adopted by reference in Section 62-730.180, F.A.C., as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.



Signature of Authorized Representative of Insurer

Anthony Gentile

Type Name

Vice President

Title

Authorized Representative of:

Indian Harbor Insurance Company

Name of Insurer

505 Eagleview Blvd. Exton, PA 19341

Address of Representative

NOTE: The format shown in the below document is a sample. The requirement is for the information to be shown; the way it is shown is up to the preparer.

**STORAGE TANK CERTIFICATE OF INSURANCE
TO DEMONSTRATE FINANCIAL RESPONSIBILITY**

40 CFR Part 280.97(b)(2)

Name and Address [name and address of each covered location]:

Name:

Address:

Clean Harbors Florida LLC

7001 Kilo Drive, Bartow, FL 33830

Policy Number: PEC004203903

Period of Coverage: 11/1/2016 – 11/1/2017

Name and Address of Insurer or Risk Retention Group:

Indian Harbor Insurance Company
Seaview House, 70 Seaview Avenue
Stamford, CT 06902-6040

Name and address of Insured:

Clean Harbors, Inc.
42 Longwater Drive
Norwell, MA 02061

1. Indian Harbor Insurance Company, the Insurer, as identified above, hereby certifies that it has issued liability insurance covering the following aboveground storage tanks:

Identification Number	Facility Name	Address	# of Tanks
FLD980729610	Clean Harbors Florida, LLC	7001 Kilo Drive Bartow, FL 33830	Two (Tank #s 700 & 701)

For taking corrective action and /or compensating third parties for bodily injury and property damage caused by either sudden and non-sudden accidental releases in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy arising from operating the storage tanks(s) identified above.

The limits of liability are:

Each Occurrence: \$ 1,000,000
2,000,000

Annual Aggregate: \$ _____

if the amount of coverage is different for different types of coverage or for different storage tanks or
FL-AST (4/10)

locations, indicate the amount of coverage for each type of coverage and/or for each storage tank or location] exclusive of legal defense costs, which are subject to a separate limit under the policy. This coverage is provided under PEC004203902. The effective date of said policy is November 1, 2015

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this certificate applies.
- b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the insured for any such payment made by the Insurer.

This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95-280.102.

- c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.
- d. Cancellation or any other termination of the insurance by the Insurer except for non-payment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured. Cancellation for non-payment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of 10 days after a copy of such written notice is received by the insured.
- e. The insurance covers claims otherwise covered by the policy that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the policy except where the new or renewed policy has the same retroactive date or a retroactive date earlier than that of the prior policy, and which arise out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97(b)(2) and that the Insurer is licensed to transact the business of insurance.



(Signature of Authorized Representative of Insurer)

Date:

11/21/16

Anthony Gentile, Vice President

Authorized Representative of Indian Harbor Insurance Company

c/o XL Catlin
505 Eagleview Boulevard
Suite 100
Exton, PA 19341-0636

Bell, Wallace M

From: TrackingUpdates@fedex.com
Sent: Monday, November 28, 2016 9:41 AM
To: Bell, Wallace M
Subject: FedEx Shipment 777782054032 Delivered

Your package has been delivered

Tracking # 777782054032

Ship date:
Wed,
11/23/2016

Wallace Bell
Clean Harbors Env
Services
North Andover, MA
01845
US

Delivery date:
Mon,
11/28/2016 9:35
am

Mr. Edgar
Echevarria
Florida DEP
2600 Blairstone Road,
MS 4548 Financial
Assurance
Subsection
TALLAHASSEE, FL
32399
US

Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	<u>777782054032</u>
Status:	Delivered: 11/28/2016 09:35 AM Signed for By: R.HOLTON
Signed for by:	R.HOLTON
Delivery location:	TALLAHASSEE, FL
Delivered to:	Mailroom
Service type:	FedEx Standard Overnight
Packaging type:	FedEx Envelope



Clean Harbors Environmental Services, Inc.
221 Sutton Street
North Andover, MA 01845
978.683.1002
www.cleanharbors.com

VIA FEDERAL EXPRESS (TRN 777314102309)

September 26, 2016

Mr. Edgar Echevarria
Financial Assurance Subsection
Florida Department of Environmental Protection
2600 Blainstone Road, MS 4548
Tallahassee, FL 32399-2400

RE: Hazardous Waste Facility Insurance Certificate to Demonstrate Financial Assurance
Clean Harbors Florida, LLC
170 Bartow Municipal Airport
Bartow, FL 33830
EPA ID No. FLD980729610

Dear Mr. Echevarria:

In a submittal to your attention dated September 8, 2016, I supplied an original signed Hazardous Waste Facility Insurance Certificate to Demonstrate Financial Assurance (the Certificate) issued by Indian Harbor Insurance Company for the Clean Harbors Florida, LLC facility referenced above. The Certificate was issued to document the renewal of the insurance policy as well as the annual inflation increase of the closure cost estimate from \$898,540 to \$907,525.

As noted in that submittal, Clean Harbors Florida, LLC's former street address (170 Bartow Municipal Airport) was referenced on the Certificate rather than the revised address that had previously been assigned by the City of Bartow (7001 Kilo Drive).

Please find enclosed a new original signed copy of the Hazardous Waste Facility Insurance Certificate to Demonstrate Financial Assurance that lists the correct address (7001 Kilo Drive). The other details on this Certificate, including the inflated closure cost estimate, remain unchanged from the previous Certificate.

If you have any questions or require any additional information regarding this submittal, please feel free to contact me at 978-687-5042 or at bellm@cleanharbors.com.

Sincerely,

A handwritten signature in cursive script that reads "Wallace M. Bell".

Wallace M. Bell
Compliance Manager
Clean Harbors, Inc.

Enclosure

DEP orm # 62-730.900(4)(j)
Form Title HW Fac. Insurance
Certificate
Effective Date January 5,
1995
DEP Application No.

STATE OF FLORIDA
HAZARDOUS WASTE FACILITY INSURANCE CERTIFICATE TO DEMONSTRATE
FINANCIAL ASSURANCE
FOR

☒ Closure ☐ Post-Closure ☐ Corrective Action
[Check Appropriate Box(es)]

The term "Required Action" as used in this document means closure, post-closure, or corrective action, or any combination of these, which is checked above.

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House
70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured(herein called the "Insured"):

Clean Harbors, Inc.
42 Longwater Drive, Norwell, MA 02061

Facilities Covered: List for each facility: The EPA/DEP Identification Number, name, address, and the amount of insurance for "Required Action". Indicate "Required Action" amounts separately (these amounts for all facilities covered must total the face amount shown below).

EPA/DEP I.D. No.

Name Address

Clean Harbors Florida, LLC

7001 Kilo Drive
Bartow, FL 33830

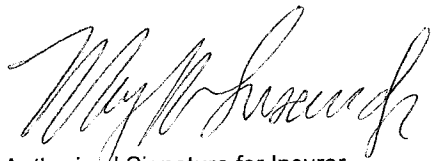
FLD 980 729 610

Face Amount: \$907,525
Policy Number: PEC004202403
Effective Date: September 6, 2016

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for Closure

for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency. Whenever requested by the Secretary of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the FDEP Secretary a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is substantially identical to the wording specified in 40 CFR 264.151(e), as adopted by reference in Section 62-730.180, F.A.C., as such regulations were constituted on the date shown immediately below.

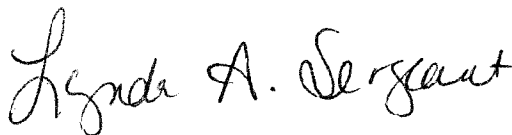


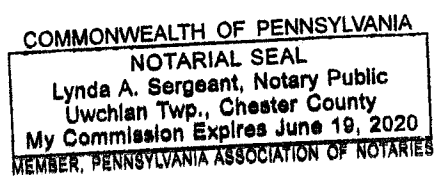
Authorized Signature for Insurer

Mary Ann Susavidge
Name of Person Signing
Vice President

Title of Person Signing

Signature of Witness Or Notary:





Bell, Wallace M

From: trackingupdates@fedex.com
Sent: Wednesday, September 28, 2016 10:09 AM
To: Bell, Wallace M
Subject: FedEx Shipment 777314102309 Delivered

Your package has been delivered

Tracking # 777314102309

Ship date:
Mon, 9/26/2016

Wallace Bell
Clean Harbors Env
Services
North Andover, MA
01845
US

Delivery date:
Wed, 9/28/2016
10:05 am

Mr. Edgar Echevarria
Florida DEP
2600 Blairstone Road,
MS 4548 Financial
Assurance Subsection
TALLAHASSEE, FL
32399
US

Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	<u>777314102309</u>
Status:	Delivered: 09/28/2016 10:05 AM Signed for By: R.HOLTON
Signed for by:	R.HOLTON
Delivery location:	TALLAHASSEE, FL
Delivered to:	Receptionist/Front Desk
Service type:	FedEx Express Saver
Packaging type:	FedEx Envelope
Number of pieces:	1
Weight:	0.50 lb.



Clean Harbors Environmental Services, Inc.
221 Sutton Street
North Andover, MA 01845
978.683.1002
www.cleanharbors.com

VIA FEDERAL EXPRESS (TRN 777182709352)

September 8, 2016

Mr. Edgar Echevarria
Financial Assurance Subsection
Florida Department of Environmental Protection
2600 Blainstone Road, MS 4548
Tallahassee, FL 32399-2400

RE: Financial Assurance Renewal and Annual Inflation Increase
Clean Harbors Florida, LLC
170 Bartow Municipal Airport
Bartow, FL 33830
EPA ID No. FLD980729610

Dear Mr. Echevarria:

Enclosed please find an original signed Hazardous Waste Facility Insurance Certificate to Demonstrate Financial Assurance (the Certificate) issued by Indian Harbor Insurance Company for the Clean Harbors Florida, LLC facility referenced above. The policy under which the Certificate is issued, PEC0042024, has been renewed, effective September 6, 2016, for one (1) year. The renewed policy number is PEC004202403.

Additionally, the Certificate documents that the closure financial assurance provided by the insurance policy has been increased for inflation, effective September 6, 2016. The inflation increase was calculated by multiplying the current 2015 cost estimate by the inflation factor 1.010. This inflation factor was calculated by dividing the annual Implicit Price Deflator (IPD) for Gross National Product (GNP) for 2015 (109.868) by the annual IPD for GNP for 2014 (108.800). These IPDs were obtained on July 13, 2016 from Table 1.1.9 (Implicit Price Deflators for Gross Domestic Product) published by the U.S. Department of Commerce's Bureau of Economic Analysis.

Closure: $\$898,540 \times 1.010 = \$907,525$

Please note that the Certificate references Clean Harbors Florida, LLC's former street address (170 Bartow Municipal Airport) rather than the revised address assigned by the City of Bartow (7001 Kilo Drive). A Certificate listing the correct address is in the process of being issued and an original signed copy will be submitted to your attention as soon as it is available.

If you have any questions or require any additional information regarding this submittal, please feel free to contact me at 978-687-5042 or at bellm@cleanharbors.com.

Sincerely,

A handwritten signature in black ink that reads "Wallace M. Bell".

Wallace M. Bell
Compliance Manager
Clean Harbors, Inc.

Enclosure

DEP orm # 62-730.900(4)(j)
Form Title HW Fac. Insurance
Certificate
Effective Date January 5,
1995
DEP Application No.

STATE OF FLORIDA
HAZARDOUS WASTE FACILITY INSURANCE CERTIFICATE TO DEMONSTRATE
FINANCIAL ASSURANCE
FOR

☒ Closure ☐ Post-Closure ☐ Corrective Action
[Check Appropriate Box(es)]

The term "Required Action" as used in this document means closure, post-closure, or corrective action, or any combination of these, which is checked above.

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House
70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured(herein called the "Insured"):

Clean Harbors, Inc.
42 Longwater Drive, Norwell, MA 02061

Facilities Covered: List for each facility: The EPA/DEP Identification Number, name, address, and the amount of insurance for "Required Action". Indicate "Required Action" amounts separately (these amounts for all facilities covered must total the face amount shown below).

EPA/DEP I.D. No.

Name Address

Clean Harbors Florida, LLC

170 Bartow Municipal Airport
Bartow, FL 33830

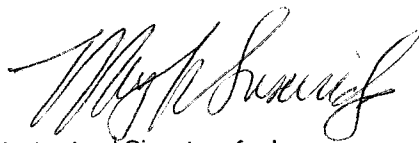
FLD 980 729 610

Face Amount: \$907,525
Policy Number: PEC004202403
Effective Date: September 6, 2016

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for Closure

for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency. Whenever requested by the Secretary of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the FDEP Secretary a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is substantially identical to the wording specified in 40 CFR 264.151(e), as adopted by reference in Section 62-730.180, F.A.C., as such regulations were constituted on the date shown immediately below.



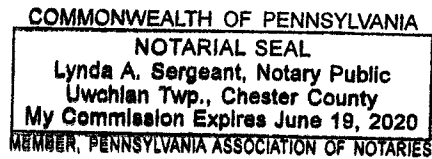
Authorized Signature for Insurer

Mary Ann Susavidge
Name of Person Signing
Vice President

Title of Person Signing

Signature of Witness Or Notary:

 9/2/16



Bell, Wallace M

From: trackingupdates@fedex.com
Sent: Monday, September 12, 2016 9:41 AM
To: Bell, Wallace M
Subject: FedEx Shipment 777182709352 Delivered

Your package has been delivered

Tracking # 777182709352

Ship date:
Fri, 9/9/2016

Wallace Bell

Clean Harbors Env

Services

North Andover, MA

01845

US

Delivery date:

Mon, 9/12/2016

9:36 am

Mr. Edgar Echevarria

Florida DEP

2600 Blairstone Road,

MS 4548 Financial

Assurance Subsection

TALLAHASSEE, FL

32399

US

Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number: 777182709352

Status: Delivered: 09/12/2016
09:36 AM Signed for
By: R.HOLTON

Signed for by: R.HOLTON

Delivery location: TALLAHASSEE, FL

Delivered to: Mailroom

Service type: FedEx Standard
Overnight

Packaging type: FedEx Envelope

Number of pieces: 1

Weight: 0.50 lb.