

Thursby, Kim

From: Crandall, Scott <Scott.Crandall@Crystal-Clean.com>
Sent: Friday, October 13, 2017 9:20 AM
To: Epost HWRS
Cc: Cinquino, Dawn
Subject: Heritage Crystal Clean, Inc. (Pompano Beach); FLD 984 262 410;Closure Plan

Received
thx



Scott Crandall, PE
Director of EH&S
813-335-5341

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Thursby, Kim

From: Epost HWRS
Sent: Friday, October 06, 2017 8:55 AM
To: 'Crandall, Scott'
Cc: Baker, Bryan; Walker, Kim (Waste); 'bastek.brian@epa.gov'; Kothur, Bheem; Igoe, Amber; Andreotta, Jason; Wierzbicki, Paul; Blandin, Norva
Subject: Heritage Crystal Clean, Inc. (Pompano Beach); FLD 984 262 410; Closure Plan
Attachments: 10-6-17 HCC Pompano Beach Review Ltr Closure Plan.pdf.Receipt.pdf

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

Noah Valenstein
Secretary

October 6, 2017

Scott Crandall, P.E.
Director of EH&S
Heritage Crystal Clean, Inc.
105 S. Alexander Street
Plant City, Florida 33563
scott.crandall@crystal-clean.com

RE: **Closure Plan**
Heritage Crystal Clean, Inc. (Pompano Beach); FLD 984 262 410
Permit Numbers: 51348-009-HO/51348-010-SO

Dear Mr. Crandall:

The Department has completed its review of the referenced document regarding closure of the Used Oil and Material Processing facility located at 1280 Northeast 48th Street, in Pompano Beach, Broward County, Florida 33064. The Closure Plan contains many of the necessary components for a Used Oil Closure Plan under Chapter 62-710, Florida Administrative Code (F.A.C.); however, the plan is lacking some specific details as discussed in the enclosed comments. Please address these comments by submitting a revised Closure Plan. The revised plan should be submitted by November 6, 2017.

Should you have any questions, please contact me at (850) 245-8766 or via email at Dawn.Cinquino@dep.state.fl.us.

Sincerely,

A handwritten signature in blue ink that reads "Dawn Cinquino".

Dawn M. Cinquino, Esq., P.E., P.G.
Hazardous Waste Program & Permitting

Mr. Scott Crandall
October 6, 2017
Page 2 of 6

DC/mr

cc:

Brian Bastek, EPA Region 4, Bastek.Brian@epa.gov
Bheem Kothur, DEP Headquarters, bheem.kothur@dep.state.fl.us
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Enclosure

General Comments:

1. The Closure Plan should be dated and paginated.
2. The Closure Plan must reference and follow all applicable Department rules and Standard Operating Procedures (SOPs), including those that pertain to mobilization, decontamination, field testing, soil and groundwater sampling, documentation and reporting.
3. Throughout the Closure Plan, acronyms are used without being defined first. Please either define at first use or provide an acronym sheet.
4. In the closure plan submitted with the last permit application (August 2012)¹, on page 8-1, there is a reference to FDEP's Storage Tank System Closure Assessment Requirements guideline. Although not mentioned in the 2017 submitted plan, the Department would like to note that the guidance was updated in April 2016 with an effective date of January 11, 2017 (<https://www.flrules.org/Gateway/reference.asp?No=Ref-07662>). Storage Tank rules, Rules 62-761 and 62-762, F.A.C. were also recently revised (<http://www.dep.state.fl.us/waste/categories/shw/pages/announcements.htm>). Please be sure to review the guidance document and rule changes, and update the Closure Plan, if necessary.

Specific Comments:

1. Page 1, Intro: incorrect citation. "Rule 62-762.801(3) and (4), F.A.C." should read "Rule 62-762.801(2) and (3), F.A.C."
2. Page 2, Closure of Tank Storage: This section is lacking in detail. Please include a description of which tanks compose the 496,500 gallons.
3. Page 3, Table 1 – Summary of Aboveground Storage Tanks:
 - a. The footnote for the asterisk in column 4 is missing from this table. Please include the footnote.
 - b. The last two tanks on this table (Wastewater Treatment Area - Zone D) are labeled 31 and 32. On Figure 1, these tanks are labeled 30 and 31. Please review and revise the tables to be consistent.
 - c. It would be appropriate to identify the different zones listed on the table (Zones A, B, C and D) on a figure. The application¹ identifies only Zones A, B and C in the SPCCP (Figure 2).
4. Page 3, Paragraph below Table: Per Rule 62-710.800(5)(a)(3), "all tanks, piping, secondary containment and ancillary equipment will be emptied, cleaned and decontaminated, and all materials removed and managed." The sentence "HCC will remove or decontaminate used oil residues in tanks" should be reworded to clarify that the used oil residues will be removed (*i.e.*, tanks emptied), and the tanks cleaned and decontaminated afterwards. The above cited rule should be referenced.

¹ FCC Environmental Used Oil Processing Permit Application, Pompano Beach Facility dated August 2012.

5. Page 4, paragraph 1: Please clarify or address the following issues concerning waste characterization:
 - a. Please identify in the paragraph or include a table identifying the parameters and EPA Method number(s) for waste characterization. The plan lists “TCLP metals”. Please specify which metals (i.e., 8 RCRA metals including arsenic, chromium, etc.).
 - b. The volatile testing should specify if the testing is limited to the VOCs that have a hazardous waste characteristic (TCLP VOCs), or if the intent was to perform a VOC Method and report totals. If the latter, the method should be identified (e.g., EPA Method 8260).
 - c. At a minimum, the Closure Plan must indicate that quality assurance procedures will comply with Chapter 62-160, F.A.C., and that all closure activities will follow DEP’s SOPs located at:
<http://www.dep.state.fl.us/water/sas/sop/sops.htm>. For example, Waste Sampling must follow FS 5000. Other SOPs will apply to this closure.
 - d. Please identify the “confined space entry procedures” or applicable rule that applies which will be followed if needed.
6. Page 4, Visually Contaminated Soils: This section lacks sufficient detail. Please describe the documentation of any observed staining and cracking (written description, photos, identify on a map, etc.), the determination of the extent of excavation necessary (including depth), and the steps to be taken to confirm complete removal of contaminated media at that location.
7. Pages 4-5, Closure Assessment of Groundwater and Soil: This section lacks sufficient detail. Many of the necessary details and references were included in the original Closure Plan submitted in the 2012 application. You may want to review that plan and incorporate some of those details. Additionally, you may want to consider the following:
 - a. Organization: Please consider dividing the soil and groundwater discussions into separate subsections for clarity purposes.
 - b. Soil sampling:
 - i. The original Closure plan in the 2012 application proposed that twenty (20) soil samples would be collected and analyzed; however, only four (4) are proposed in this plan. The Department is concerned that only 4 locations/samples will be inadequate to assess the soil contamination at this facility. Are these locations in addition to any locations with staining or do they include those? Please explain the reduction in soil sampling locations and provide a rationale for the limited number of soil samples, or increase the amount.
 - ii. The final number of confirmatory soil samples should be discussed with the DEP project manager, and would be based upon the size of the excavation and/or areas of staining. Additional sample locations may be selected by DEP based upon onsite visual observations. A note to this effect should be added to the plan.
 - iii. Proposed locations should be adjusted and located at significant cracks in the concrete (Google maps show significant cracking throughout the facility, including north of the tank farm).

- iv. A discussion of any drainage features at the facility, such as sumps, trench drains, catch basins and retention basins should be added to the plan. Visual inspection and potential sampling of these features should be discussed.
- v. At least one additional sample location should be taken in the dry retention basin located at the northwestern corner of the property. In addition to the proposed analysis of the highest OVA response, one sample must be taken from the 0-6" interval to assess direct human exposure. If other samples are taken from soils that are not covered by concrete, the 0-6" sample must be taken.
- c. Soil Sample Analysis:
 - i. Per FDEP's guidance document on storage tank closures (see reference above), the parameters to be tested upon closure for used oil are listed in Table D of the guidance. Please review this table and revise this section accordingly. Note, that PCBs should be added and the 8 RCRA metals identified. Also, soil sample results must be reported in totals (not TCLP).
 - ii. Total concentrations should be compared to the Soil Cleanup Target Levels (SCTLs) in Chapter 62-777, F.A.C. Soil concentrations must meet residential SCTLs in order to achieve a "clean closure". If residential SCTLs are exceeded, site assessment must be conducted in accordance with Rule 62-780.600, F.A.C. Please include language in the plan addressing this.
- d. Groundwater Sampling/Analysis: The use of temporary wells, prepacked wells or Geoprobe® is acceptable.
 - i. Keep in mind that Geoprobe® samples can be highly turbid and may result in elevated concentrations of metals.
 - ii. Selection of the sand pack size for wells is important because the improper size may also result in elevated turbidity and elevated concentrations of metals.
 - iii. Slow purge techniques should be used for the wells.
 - iv. The groundwater samples should be taken from the uppermost portion of the surficial aquifer system.
 - v. If parameters exceed Groundwater Cleanup Target Levels (GCTLs), in Chapter 62-777, F.A.C., permanent wells must be installed and site assessment must be conducted in accordance with Rule 62-780.600, F.A.C.
- 8. Page 5, last paragraph, Reporting: Please include a separate notification/reporting section in the Closure Plan. This section should discuss who is informed, how (i.e., written notification/report), and when, prior to and at the completion of closure activities.
- 9. Figure 1 – Site Plan and Proposed Boring/MW Locations: Please see Specific Comment 3b regarding this table. Minor grammatical error: the word "Boundary" is misspelled.