

Thursby, Kim

From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Friday, October 06, 2017 3:25 PM
To: Epost HWRS
Subject: RE: Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484;First Request for Additional Information (RAI)

Received.

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS
Sent: Friday, October 06, 2017 2:45 PM
To: Yuri Turovsky
Cc: Baker, Bryan; Walker, Kim (Waste); Fellabaum, Pamela; Butler, Homer; McBride, Ashanti; Kothur, Bheem; Buselli, Bradley; Jarmolowski, James; Eldredge, Susan F.; 'admin@mittauer.com'
Subject: Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484;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

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

October 6, 2017

Mr. Yuri Turovsky, Plant Manager
Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida 33314
Yuri.turovsky@liquidenviro.com

RE: **First Request for Additional Information (RAI)**
Duval County – Hazardous Waste
Facility Name: Liquid Environmental Solutions of Florida, LLC
EPA I.D. No.: FLD 981 928 484
Current Permit Number: 72815-016-HO; 72815-017-SO
DEP Application No.: 72815-017-HO; 72815-018-SO

Dear Mr. Turovsky:

Thank you for your application for renewal of the Used Oil and Solid Waste Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 72815-017-HO; 72815-018-SO to the application. A Department staff review of the application and supporting documentation submitted on August 21, 2017 and September 25, 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. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

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 30 days of the date of this letter, November 6, 2017, 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.

Mr. Yuri Turovsky

Page 2 of 7

October 6, 2017

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Dawn.Cinquino@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 Dawn.Cinquino@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Dawn Cinquino by telephone at 850-245-8766 or by e-mail at Dawn.Cinquino@dep.state.fl.us.

Sincerely,



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

Attached: List of Requested Information

cc:

Pam Fellabaum, DEP Northeast, pam.fellabaum@dep.state.fl.us

Homer Butler, DEP Northeast, homer.butler@dep.state.fl.us

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

Bheem Kothur, DEP Headquarters, bheem.kothur@dep.state.fl.us

Bradley Buselli, DEP Headquarters, bradley.buselli@dep.state.fl.us

James Jarmolowski, DEP Headquarters, james.jarmolowski@dep.state.fl.us

Susan Eldredge, DEP Headquarters, susan.f.eldredge@dep.state.fl.us

Joseph Mittauer, Mittauer & Associates, admin@mittauer.com

Attachment: List of Requested Information

Facility Name: Liquid Environmental Solutions of Florida, LLC
EPA I.D. No.: FLD 981 928 484
Current Permit Number: 72815-016-HO; 72815-017-SO
DEP Application No.: 72815-017-HO; 72815-018-SO

1. Tab 1, DEP Form 62-710.901(6):

- a. Part I, Page 1 of 8, #12, Legal Structure: Please list the state of incorporation and resubmit this page electronically for our records.
- b. Part I, Page 2 of 8, #12, Legal Structure: Please list the state where the name is registered, if operating under an assumed name and resubmit this page electronically for our records.
- c. Part I, Page 3 of 8, C. Operating Information, 2: Please add the following EPA hazardous waste codes: F003, F005 and D002 and resubmit this page electronically for our records.
- d. Part II, Certifications, page 5 of 8, Operator Certification: No date is included. Please submit a dated form.

2. Tab 2, Attachment B.3:

- a. Design Sheet B-3c: Please explain why tank #30 is depicted using a different symbol than other tanks. Resubmittal of the design sheet is not necessary.
- b. Design Sheet B-3d: Design Sheet B-3c states that Tanks 3A, 3B, 4A, and 4B will be removed in 2017; whereas, this sheet does not say when?. In light of the fact that we are in the 10th month of 2017, when are these tanks scheduled to be removed? Resubmittal of the design sheet is not necessary.

3. Tab 4, Attachment C.4:

- a. Page 1, Operating Information:
 - i. Oily Wastewater: In the section on processing under Oily Wastewater, free oil will be removed and transferred to tanks 4A, 4B, or the oil processing tanks. Tanks 4A and 4B are scheduled to be removed. How will this process change when the tanks are removed?
 - ii. Used Oil (last paragraph): Tank 21 is listed as Virgin Fuel and not Used Oil, and Used Oil tank 101 is not listed. Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

4. Tab 5, Attachment C.5:

- a. Page 4, 2.1 Used Oil Acceptance Protocol: For future permit application renewals, please note that the spelling of (Dexsil **Chlor**-D-Tect) should read (Dexsil **Clor**-D-Tect).
- b. Page 5, 1st paragraph: Please note that the word “coliwasa” is an abbreviation for “Composite Liquid Waste Sampler.” For future note, abbreviations should be spelled out the first time the abbreviation is used in a document.
 - i. Page 7, 2.3 Acceptance Records: Per Rule 62-710.510(1), F.A.C., the information recorded for each accepted used oil load should include the following in addition to what is listed on this page of Attachment C.5. The telephone number of the transporter,

- ii. The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and
- iii. Documentation of halogen screening in accordance with the requirements of 40 CFR Part 279 [as adopted in subsection 62-710.210(2), F.A.C.].

Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

5. Tab 6, Attachment C.6 & 7:

- a. Page 1, Spill Prevention, Control and Countermeasure Plan: Please add Emergency Coordinator and name.
- b. Page 4: The Certification page for the SPCC Plan is dated June 1, 2014 but is not signed. Please sign, update the date, and resubmit electronically for our records.
- c. Page 8 & 9, 6.0 Facility Description: In the second paragraph, please review the storage capacities listed for oil and wastewaters tanks and revise, if needed. Why does the table on page 9 exclude Tank #101? Please submit any revised pages electronically for our records.
- d. Page 10, Containment and Diversionary Structures: Please provide the secondary containment calculations for the facility and reference them in this section.
- e. Page 16, 8.0 Notification and Response Procedures, Major Spill Events: Addresses for the emergency coordinators must also be provided in the Contingency Plan for the facility per 40 CFR 279.52(b)(2)(iv). Please either provide that information here or refer to the information in Appendix A.
- f. Page 25, 11.0 Facility Inspection and Records: Add the following tank inspection requirements; Document weekly PCW container and/or tank inspections per Rule 62-740.100(2)(e), F.A.C.
- g. Page 31, 14.0 Inspection and Reporting Forms: Add a separate section for PCW Tanks per Rule 62-740.100(2)(e), F.A.C.
- h. Page 44, Chemical Spills: The command post area, the LES Operations Office, is identified as the area to convene for assessing any emergency response actions. Please identify this location on the Evacuation Map, Design Sheet C-7e.2. Note that the word “evacuation” is misspelled in the legend.
- i. Appendix A: Roster of Personnel:
 - i. This roster is dated January 10, 2008. Please update the date on the roster and verify that the information provided is still accurate as that was nearly 10 years ago.
 - ii. List the names, addresses, and phone numbers (**office and home**) of all persons qualified to act as an emergency coordinator (EC) per 40 CFR 265.55 for EC requirements. Where more than one person is listed, the facility must name a **primary** EC and others must be listed in the order in which they will assume responsibility as **alternates**.

- j. In light of recent Hurricane Irma, please add a section in your SPCC Plan addressing hurricane preparation/response.
- 6. **Tab 7, Attachment C.8:**
 - a. Page 1, Tanks and Related Equipment: Please provide the secondary containment calculations for the facility and reference them in this section.
- 7. **Tab 8, Attachment C.9:**
 - a. Page 1, Closure Plan, Introduction: Written notification to the Department should be made within 60 days, not 30 days, prior to the scheduled date of closing, per Rule 62-710.800(5)(d), F.A.C. Please revise and resubmit this page electronically for our records.
 - b. Page 4, Schedule of Analytical Methods: The footnote cites to EPA Method 8023. Did you mean EPA Method 9023? Please revise if needed and resubmit this page electronically for our records.
 - c. Page 5, Soil and Groundwater Sampling Protocols: Upon closure, soil and groundwater sampling should be conducted per Rule 62-780, F.A.C. Per this rule, samples should be collected from land surface to 6", 6" to 2', and so on until the water table is reached. Are each of the proposed locations covered by concrete, asphalt or bare soil? Please review this section, revise and provide more detail. Please submit this page electronically for our records. Note that the Department inspector may request different and/or additional soil sampling locations at closure depending on the site conditions existing at that time.
 - d. Design Sheet C-9b: Please explain why Tank #47 is partially dashed on this design sheet. According to the legend, dashed tanks have not been constructed. Please verify that Tank #47 is existing. Resubmittal of the design sheet is not necessary.
 - e. Appendix C: Tank Inspection & Integrity Test Plan: Add the following tank inspection requirements; Document weekly PCW container or tank inspections per Rule 62-740.100(2)(e), F.A.C.
- 8. **Attachment C.10, Page 5:**
 - a. 2.2 Florida Used Oil Rule: Change to read: **2.2 Florida Used Oil Rule-62-710, F.A.C.**
 - b. 2.3 Florida PCW Rule: Change to read: **2.3 Florida PCW Rule-62-740, F.A.C.**
- 9. **Attachment C.10, C. Department Rules (Florida Administrative Code F.A.C.), found in:** Add the following PCW 62-740, F.A.C Rules:
 - a. 62-740.010 Declaration of Intent.
 - b. 62-740.020 Applicability.
 - c. 62-740.030 Definitions.
 - d. 62-740.040 General.
 - e. 62-740.100 Management Practices for Producers of PCW for Product Recovery.
 - f. 62-740.200 Management Practices for Transporters Shipping PCW for Product Recovery.
 - g. 62-740.300 Management Practices for Recovery Facilities.
- 10. **Tab 10, DEP Form 62-701.900(4):**
 - a. Page 4 of 4, C – Certification by Applicant and Engineer or Public Officer: Signature of the Applicant/Plant Manager is not dated. Please submit a dated

signed page for our records.

Review Comments for Application for Renewal Material Processing Facility Permit:

The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C. The following items are provided:

1. Section B of DEP Form # 62-701.900(4), electronic document page 113 contains a list of reports and documentation required. The application indicated "See Attachment A", which was submitted as part of the previous application on March 18, 2013. It is recommended the applicant revise Section B to reflect that Attachment A was previously submitted on March 13, 2013, and is still applicable. Rule reference: 62-701.710(2)(a).
2. The application did not include a site plan that shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site. The site plan should have a scale not greater than 200 feet to one inch, and be signed and sealed by a professional engineer pursuant to Chapter 471, Florida Statutes. A site plan that meets these requirements should be submitted. Rule reference: 62-701.710(2)(b).
3. The application did not include information regarding record keeping of the materials associated with the materials processing portion of the permit. Operational records are required to be maintained to include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records shall include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years. Additional information regarding how the record keeping requirements will be met should be submitted. Rule reference: 62-701.710(2)(e) and 62-701.710(8)(a).
4. It is recommended that the first sentence of the Closure Plan in Attachment C.9 (electronic document page 88) be revised to reflect that the closure plan is also intended to fulfill the requirements in Chapter 62-62-701.710(6). Rule reference: 62-701.710(2)(f) and 62-701.710(6).
5. No specific information was provided by the applicant regarding the financial assurance requirements specified in 62-701.710(7), F.A.C. Additional information regarding how the financial assurance requirements will be met should be submitted. Rule reference: (62-701.710(2)(h), F.A.C.).

Citation Errors: Please note that the following citation errors were observed in the permit application. Please review, revise and resubmit the appropriate pages electronically for our records:

1. Tab 5, Attachment C.5:

- a. Page 6, 2.2.1 Process Knowledge: Incorrect Reference. Reference 40 CFR 261.**5(i)** is listed as reserved. Did you mean 40 CFR 261.**3(v)**?

- b. Page 7, 2.3 Acceptance Records: Incorrect Reference. Rule 62-710.510(1)(**c**), F.A.C. should read Rule 62-710.510(1)(**d**), F.A.C.
 - c. Page 8, 3.1 Off-specification Used Oil: Incorrect Reference in (6), end use of the oil. The reference (Rule 62-710.510(1)(**e**), F.A.C.) should read Rule 62-710.510(1)(**f**), F.A.C.
2. **Tab 8, Attachment C.9:**
- a. Page 1, Closure Plan, Introduction: Incorrect citation. Chapter 62-710.800(**9**), F.A.C. should read Chapter 62-710.800(**5**), F.A.C.
 - b. Page 2, Closure Procedures: Incorrect citation. 40 CFR **1**79.54(h)(ii) should read 40 CFR **2**79.54(h)(ii).
3. **Tab 9, Attachment C.10:** There are a few citation errors within your document titled, “A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program.”
- a. Under B, Florida Law, #4: §403.708(**14**) should read §403.708(**12**)(**b**).
 - b. Under C, Department Rules:
 - i. #1: “(**85**) oily wastes and (**129**) used oil” should read “(**78**) oily wastes and (**122**) used oil.”
 - ii. #2: Rule 62-701.300(8**b**) should read Rule 62-701.300(8)(**a**).