



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Armando Gonzalez
Engineer, Southwest District

THROUGH: Satish Kastury *SK*
Environmental Administrator
Hazardous Waste Permitting

FROM: Rabin Prusty *RP*
Engineer
Hazardous Waste Permitting

DATE: May 25, 1988

SUBJECT: Safety-Kleen - Draft Construction Permit HC29-118986

The RCRA permitting staff in Tallahassee upon reviewing the draft construction permit for the subject facility have generated the following comments:

1. Please include General Conditions in the draft permit.
2. Please rewrite Specific Condition 3 as follows:

"Upon completion of construction, the permittee shall submit a certification of construction certifying that the hereby permitted unit has been constructed as specified in the application, this permit and approved modifications. This certification shall comply with Rule 17-30.220(5), F.A.C. The permittee shall also submit to the Department "as built" drawings, including location of all safety equipment, security devices, communication devices, water for fire control, spill control equipment, etc."
3. Please rewrite Specific Condition 4 as follows:

"At least sixty (60) days before the date on which hazardous waste is first received for storage, the permittee shall establish financial assurance for closure (40 CFR Part 264.143) and demonstrate financial responsibility for sudden accidental occurrences (40 CFR Part 264.147(a))."
4. Please rewrite Specific Condition 6 as follows:

"The permittee shall submit to the Department a written assessment certified by a professional engineer registered in the State of Florida, in accordance with 40 CFR Part 264.192 that the tank system has been constructed to ensure sufficient structural integrity, and

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is acceptable for the storage of hazardous waste. The assessment shall show that the foundation, structural support, seams, connections, and pressure controls are adequately designed and constructed, and that the tank system has sufficient structural strength."

5. Please rewrite Specific Condition 7 as follows:

"Together with the certification of construction, the permittee shall submit a certification by an independent, qualified, professional engineer registered in the State of Florida certifying that the secondary containment meets the requirements of 40 CFR Part 264.193, and that it is constructed in accordance with Section I.E.2.C(4), page IE2-10 of the permit application."

6. Please rewrite Specific Condition 9 as follows:

"The permittee shall apply for an operation permit when the construction of the facility is completed and certified in accordance with Specific Condition 3. The operation permit application shall include the following:

- a. All of the information approved in the construction permit application;
- b. Additional information requested in this permit;
- c. Changes required in the personnel training plan, the inspection schedule, the contingency plan, etc., which may be required as a result of any modification."

7. Please add the following Specific Condition to the draft construction permit:

"The permittee shall not begin operation of the waste storage unit(s) until the facility has applied for and received an operation permit from the Department in accordance with the provisions of Chapter 17-30 Part IV, Florida Administrative Code."

If you have any questions, please call me at SUNCOM 278-0130

RP/do

cc: Barry Swihart - BWP&R/Tallahassee
James Scarbrough - EPA/Region IV