



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

TO: File

THROUGH: Satish Kastury *[Signature]*  
Environmental Administrator  
Hazardous Waste Regulation

FROM: Merlin D. Russell, Jr. *[Signature]*  
Environmental Specialist III  
Hazardous Waste Regulation

DATE: November 3, 1988

SUBJECT: Tampa District Meetings of October 19 and 20, 1988. Meeting with Safety Kleen on October 20, 1988.

Meetings were held with the District Office in Tampa to discuss various permitting, compliance and enforcement issues, and a meeting was held on Thursday, October 20th, with representatives of Safety Kleen. Topics are summarized below in alphabetical order. The following people were present on the 19th:

1. EPA - Daryl Himes
2. District Office - Clabe Polk, Diane Trommer, Armando Gonzalez, Bill Crawford, Beth Knauss
3. Tallahassee - Bill Holland, Merlin Russell

1. Alpha Resins FLD 041 495 441. Armando determined that the closure permit need not be modified to address the new tank requirements.
2. Armco FLD 064 675 978. October 17, 1988 memo (Russell to Gonzalez) was discussed. District may take enforcement action for noncompliance with the closure permit. I also suggested a meeting be scheduled with the facility to discuss post-closure requirements because of groundwater contamination.
3. Aristech FLD 000 654 251. Draft C.O. for operating a hazardous waste facility without a permit and violations of an EPA inspection report nearly ready to go to OGC for review. EPA requested a copy of the draft order FYI. Diane Trommer will send draft to Tallahassee RCRA staff for review. The status of the OP application should be received in early 1989 after waste determination of contents of tank under construction is completed.
4. Avon Park Air Force Range FL8 572 128 587. Tampa will resolve pending enforcement actions. Orlando District will take the lead on any new enforcement actions.

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5. Continental Can Corporation FLD 004 092 441, closure permit HF29-101729. CCC undergoing status change. Tallahassee has lead.
6. Fairchild Weston FLD 083 200 998, closure permit application HF58-110918. DER still waiting for EPA's response to our June 28, 1988 memo requesting status of the sprayfield. Tallahassee has sent "tank" demonstration to FAMU/FSU College of Engineering for review. District to complete earlier inspection report with violations - will notify FW that "tank" issue is still unresolved. Armando handed out a summary of concerns (attached).
7. Florida Fence Post FLD 004 107 017. Daryl Himes did an inspection of FFP on October 18, 1988. FFP has regulated units, a tank and wastepile, which are being operated without a hazardous waste permit. Also, FFP had no closure plan or adequate 265 groundwater monitoring system. Details forthcoming in Findings of Facts. Bill Holland asked Daryl to have the Regional Council contact Diane Trommer or Tom Maurer to assure actions taken do not interfere with current court order.
8. Florida Tile FLD 004 091 583. Diane suggested OGC finalize CO on stormwater retention pond and send immediately to facility. State has until November 14, 1988 to take action before EPA intends to overfile.
9. Gulf Coast Lead FLD 004 092 839. Diane will send last set of groundwater analytical data to Allen Antley FYI. District to write GCL for waste determination of sludges collected in stormwater retention pond.
10. MacDill Air Force Base FL6 570 024 582. Daryl to inspect MacDill next month. Will seek information on disposal methods for unused hydrazine.
11. Matrix Recovery Systems FLD 981 750 606. Intent to Issue on October 17, 1988 for container storage permit. Are closing illegal storage unit via closure plan in a CO which has been agreed to, but is yet unsigned.
12. Pacific Chloride FLD 000 608 083. District waiting for Tallahassee comments on Contaminant Assessment Plan and alternate GWMP. District wrote to Chloride that closure plan approval is granted pending a demonstration that the surface impoundment waters is not actively toxic prior to discharge to Delaney Creek.
13. Piper Aircraft FLD 004 054 284. Piper submitted a "Chromium and Cyanide Study, Piper Sprayfield, Lakeland, Florida 33813" dated August 1988, prior to departmental approval of the QA/QC Plan. District has decided to review submittal to see if it conforms with previous concerns. Diane Trommer to contact Michael Blizzard (WQA & AMS) about submittal acceptance.
14. Porter's Grove Metal Recovery FLD 980 845 184. Closure permit HF53-130580 expired before closure was completed. C.O. will be drafted to complete closure activities.

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15. Resource Recovery of America FLD 980 602 734. District awaiting RFA report.
16. Royal Bumper FLD 042 475 723, OGC Case No. 84-0457. Reviewed two memos dated October 17, 1988 (Russell to Gonzalez, and Russell, Prusty and Simfukwe to Gonzalez). District to collate comments and recommendations to OGC for further action.
17. Safety Kleen FLD 049 557 408. Meeting held October 20, 1988 - list of participants attached. The following items summarize the meeting.
  - a. A consent order with monetary penalties for noncompliance with the closure permit, and recent inspection violations is forthcoming. The C.O. will require submittal of a closure permit application and IRAP. Consent Order will have performance penalties.
  - b. Permit application will be a 40 CFR 264 closure as a landfill. The facility will be submitting a risk-based closure. Safety Kleen asked for, and the Department agreed to give them two years to close. If the risk-based closure is not accepted, post-closure will be required. Facility verbally agreed to have permit application submitted by December 5, 1988. Satish explained our NOD enforcement policy.
  - c. Facility needs to submit QAPP, prior to any sampling, as soon as possible.

New Tampa facility inspected 10/18/88. District to determine if Safety Kleen is still operating as a transfer facility in compliance with previous correspondence with DER.

18. Sanitary Dash FLD 010 826 519. Discussed October 17, 1988 memo (Russell to Gonzalez). Also, first NOD on risk-based closure sent to EPA October 7, 1988 for review. Will forward to SD upon receipt from EPA. Suggested a meeting with facility at that time.
19. Schuylkill Metals Corp. FLD 062 794 003. Permit application completeness dependent upon facilities response to QA review questions. If QA Plan is approved, permit will be issued.
20. TRAK Microwave FLD 004 093 621. Closure Permit HF29-120188. Discussed October 17, 1988 memo (Oyelowo to Gonzalez). Facility has not yet submitted well installation report and additional groundwater information. District lead.

MDR/do

cc: Jim Scarbrough, EPA/Region IV  
Clabe Polk, DER/Tampa  
Charlie Biedermann, BWP&R  
Barry Swihart, BWP&R  
Mike Redig, BWP&R



## Fairchild Weston Systems, Inc.

The facility generated F006 hazardous waste sludge from plating operations. The sludge containing wastewaters were treated at an industrial waste permitted treatment plant. Vessels which were part of the treatment plant were designated surface impoundments in the past, and lately information has been provided that may classify them as tanks.

Sludge from wastewater treatment operation was allowed to dry and collected in drying beds to be disposed of off-site. Drying beds are said to classify as tanks.

Decanted liquid from the wastewater treatment operations was dispersed over a sprayfield. The following questions address the main concerns:

1. Should we accept the certification of the vessels as tanks based on:
  - a. no certification provide by the facility; or
  - ? → b. yes by a determination made by a DER contractor assisted by visual inspection, and a proof that the vessels do not leak?
2. After, and if the vessels are accepted as tanks by DER:
  - a. no could the wastewater treatment plant qualify as a totally enclosed treatment facility (264.1(g)(5) and be exempt from permitting; or
  - b. yes should it be required to close as HW treatment unit?
3. Should the effluent from the wastewater treatment plant, if properly permitted under the industrial waste program:
  - a. no be excluded as a point source discharge subject to regulation under Section 403 of the Clean Water Act (26 1.4(a)(2)); or
  - b. yes because of sludge carry-over subject the sprayfield to the HW land-disposal or land treatment regulation for closure?

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