

AN OUTLINE OF DEFICIENCIES FOR THE PART B APPLICATION SUBMITTED BY:

International Solvent Recovery, Inc.
6740 Crosswinds Drive, North, Suite D
St. Petersburg, Florida 33710

I.D. #FLD980729610

- B-1 - Specific industries served is not addressed.
- B-2 - Information should be submitted including all checklist items based on actual design and layout of the facility. This cannot be properly evaluated until the company decides how the facility will be constructed.

B-3b - Should include an FIA map or equivalent map to indicate flood plain.

B-3b(1),(2) - Must be addressed based on B-3b, above.

B-4 - Traffic patterns, controls, access roads, road surfacing, and load bearing capacities are not addressed.

checklist
C-1 - Specific waste streams are not included. ~~§122/25(a)(2) requires applicant to submit "chemical and physical analyses of hazardous wastes to be handled at the facility."~~ Applicant should explain why specific data not submitted. ~~That is facility is new with no waste on site. Recommend submission of actual data.~~ This waste specific information must be included to properly evaluate the remaining sections of the application.

C-1a - Not addressed (see C-1).

C-2a - Rationale is not given for the parameters chosen. Parameters chosen are not sufficient for proper management.

C-2b - Test methods are not referenced.

checklist
C-2c - ~~Generator sampling method should be included.~~

C-2d - Need to specify frequency and criteria for sampling incoming loads.

C-2e - See C-2d, above. ~~Verification that generator uses representative sampling methods~~ should be included.

C-2f - Specific flash point tests should be included. There is a contradiction on pp 5 and 12 regarding handling of reactive waste.

D-1a(1) - Mobile tank is defined as a container and is not addressed. Are only 55-gallon drums accepted? ~~Aside from visual inspection of containers,~~ items are not addressed. *as such*

*6/11/01
checklist*

D-1a(2) - No indication that containers are always kept closed during storage. ^{There is} Demonstrate that pallet dimensions and construction materials are adequate to support triple stacking. No specific locations for ignitable, reactive or incompatible waste. ^{at the time} Empty container and sludge management ^{are} not addressed. Applicant does not demonstrate compliance with National Fire Protection Association standards for stack storage of materials (NFPA-231C).

D-1a(3) - Calculations for containment capacity are not correct. ^{the} Drawings show 13 pallets per row. ^{the} Calculations use 12 per row. On p 76 applicant should state building must contain 10% of total capacity of drums. ~~§264.175(a)(2) requires the containment system to be "designed for efficient drainage so that standing liquid does not remain on the base longer than one hour after a leakage...unless the containers are elevated or in some other manner are protected from contact with accumulated liquids. The design submitted does not demonstrate that this standard will be met. The applicant's design is in direct conflict with the standard in that the design is based on spilled material being displaced by drums standing in the spilled liquid. Designing the center drain with a sump at the end to contain 10% of the storage capacity would be more appropriate.~~

D-1a(3)(a) - Is not included.

D-1a(3)(b) - Drawing contradicts the narrative as to east to west slope. Should be included in more specific engineering drawings. Specific handling practices should be included.

D-1a(3)(c) - Calculations given are incorrect. The other items of this section cannot be evaluated without final engineering drawings and calculations. Storm intensity data is not given.

D-1a(3)(d) - All items should be included in the engineering drawings with calculations and narrative incorporated into the final site design.

D-1a(4) - Specific details and engineering evaluations are not given.

D-2 - All portions of Section D-2 cannot be adequately evaluated until specific types of tanks are included along with their design specifications and engineering information. Specific wastes handled, including sludges, should be addressed.

and containment structures

F-1a(2)(b) - The location of the three gates should be shown. Adequate explanation of how office personnel will be able to control entrance during operating hours. Means to gain access to facility after hours should be included.

F-1a(3) - The warning signs need to be placed at all entrances and in sufficient number to be seen from any approach to the active portions of the site.

F-2a - Not addressed.

F-2a(1) - All of the potential problems have not been addressed (see F-2b(1), F-2b(2))

F-2a(2) - Incomplete based on F-2b(1), F-2b(2).

F-2b(1) - This section does not address inspections of the mobile tank and the integrity of the containment system.

F-2b(2) - The inspection schedule should be revised to address all of the checklist items for the specific tanks to be installed at the facility.

F-2c - The inspection schedule must describe the procedure for taking remedial action when an inspection reveals a problem.

F-2d - A date and time, inspector's name, the observations made, and the nature of repairs need to be included on all inspection logs.

F-3a(3) - ~~Is not addressed.~~ ^{Pre-contamination of equipment}

F-3a(4) - Maps and narrative don't agree on fire hydrants and extinguishers.

F-4 - Prevention of the contamination of the water supplies and the mitigation of effects of equipment failure and power outages have not been addressed.

F-5a - Grounding of drums during pumping and pump specifications with respect to sparking have not been addressed.

F-5d - The procedures used to insure that the incompatible wastes and materials are not placed in the same containers or in unwashed containers that previously held incompatible wastes have not been addressed.

F-5f - The applicant does not address incompatible wastes in tanks.

Emergency response upon emergency equipment and wastes handled. It should be reviewed when the emergency response manual is developed and cannot be prepared immediately at the time.

- G-1 - The facility name and location and the owner's name as well as a description of the facility operations have not been included in the contingency plan. *and distributed*
- G-2 - The name, address, office and home phone numbers, and the duties of the primary and alternate coordinators as well as a statement authorizing the designees ^{OS} coordination to commit the necessary resources to implement the contingency plan have not been included.
- G-3 - Criteria for implementing the contingency plan in a spill has not been addressed.
- G-4a - FDER phone number is for ^{incorrect} Suncom only.
- G-4c - A procedure of assessing the possible hazards to the environment and human health have not been addressed. The procedures for determining the need for evacuation have not been addressed. On spills, when would be necessary to notify the local authorities has not been addressed. *The need to notify local authorities during spills has not been addressed*
- G-4d - The emergency coordinator has not been notified for spills; explosions have not been addressed. *There is no indication that*
- G-4e - The removal and isolating of containers have not been described in fires, explosion or released to prevent spread or reoccurrence. *The procedure for*
- G-4f - Decontamination after a fire has not been addressed. Procedures for deployment of the resources for the storage and treatment of the released materials have not been addressed.
- G-4j - *Tank repairs is not addressed* There has not been any statement as to the repair of tanks.
- G-5 - Only two of the three fire hydrants are depicted on the site plan, and only eight of nine fire extinguishers are located on the site plan. The equipment listed on p. 39 is not given a location; there are no first aid and medical supplies mentioned; emergency communication or alarm systems have not been addressed.
- G-6 - A description of the cooperative agreements with the local police and fire departments, ^{and} hospitals, has not been addressed in the plan. A statement that indicates that a copy of the contingency plan will be submitted to these organizations has not been mentioned. *included*

same as

- G-7 - ~~There is no mention of any kind of evacuation plan.~~ *Evacuation not adequately addressed*
- H-1a - Job duties and descriptions need to be supplied with each job title.
- H-1b - The type of training that each employee will receive and the frequency in which the employee will be receiving training has not been included.

H-1c - ^A Demonstration that the program is directed by a person trained in hazardous waste management has not been addressed. *included*

H-1e(1) - Documentation that adequate training for the procedures for the use, inspection, repair and replacement of facility emergency and monitoring equipment has not been addressed.

H-1e(2) ⁽³⁾ ⁽⁵⁾ - Training program outline must include key parameters for waste feed cutoffs, communication or alarm systems and response to groundwater contamination.

H-2 - There is no indication that training will be successfully completed by facility personnel within six months of their employment.

I-1c - Maximum inventory will be the amount of waste in the drums as well as in the tanks at the time of closure. There is no salvage value allowed.

I-1d - There is no demonstration that decontamination has been effective.

I-1d(1) - The disposal should address all 2,016 drums; ^{de} contamination and disposal of the drums have not been addressed; verification of the decontamination has not been addressed; and the maximum inventory has not been addressed.

I-1d(2) - ~~The closure of the tanks has not been addressed in the fact that if the facility is down where it cannot be operated, the waste would not be able to go through the facility. This would cause the maximum inventory would have to include all the wastes that are stored in the tanks at the time of closure because there is no salvage value allowed. There is no verification that the decontamination has been completed. ^{has} has been accomplished.~~
Maximum tank inventory should be included

I-1e - The inspection schedule has not been addressed. *OT wastes in tanks*

I-4 - ~~There is no salvage value credit, so the maximum inventory of the drums and tanks has to be included in the disposal costs.~~

^K - The certification by the professional engineer on all engineering drawings is not addressed.
J. is not included

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- B-1 - Industries served is not addressed.
- B-2 - Information should be submitted based on actual design and layout of the facility. This cannot be properly evaluated until the company decides how the facility will be constructed.
- B-3b - Should include an FIA map or equivalent map to indicate flood plain.
- B-3b(1) - Must be addressed based on B-3b, above.
- B-4 - Traffic patterns, controls, access roads, and load bearing capacities are not addressed.
- C-1 - Specific waste streams are not included. This information must be included to properly evaluate the remaining sections of the application.
- C-1b - Cannot be addressed until specific tank construction and design is included.
- C-2 - Rationale is not given for the parameters chosen.
- C-2b - Test methods are not referenced.
- * C-2c - ~~Generator ^{representative} sampling method should be included.~~
- C-2d - Need to specify criteria for sampling incoming loads.
- C-2e - See C-2d, above. Verification that generator uses representative sampling methods.
- C-2f - Specific flash point tests should be included.
- D-1a(1) - Mobil tank is defined as a container and is not addressed. Are only 55-gallon drums accepted?
- D-1a(2) - No indication that containers are always kept closed during storage. Containers may be allowed to stand in liquids. It appears drums will overhang the pallet. No specific locations for ignitable reactive or incompatible waste. Empty container management not addressed.
- D-1a(3) - Does not give adequate information on the capacity of the containment system. Should provide engineering drawings and calculations concerning the curbs, dikes, berms, ditches and trenches.

D-1a(3)(a) - Is not included.

D-1a(3)(b) - Drawing contradicts the narrative as to east to west slope.
Should be included in more specific engineer drawings. Specific handling practices should be included.

D-1a(3)(c) - Calculations given are incorrect. You cannot address the other items of this section without final engineering drawings and calculations. Storm intensity data is not given.

D-1a(3)(d) - Should be included in the engineering drawings with calculations and narrative incorporated into the final site design.

D-1a(4) - Specific details and engineering evaluations are not given.

D-2 - All portions of Section D-2 cannot be adequately evaluated until specific types of tanks are included along with their specific specs and engineering information.

- F-1a(2)(b) - The location of the three gates needs to be shown. Adequate explanation of how office personnel will be able to control entrance during operating hours and a statement as to who will be maintaining the keys and all during the hours when the gates are locked.
- F-1a(3) - The warning signs need to be placed at all entrances to the gate *and* in sufficient number to be seen from any approach to the active site.
- F-2a - Description of the facility's inspection schedule needs to include the monitoring equipment, the emergency and safety equipment, the security devices as well as the alarms, containers, contamination center, the fence, the mobil tank and the truck unloading area.
- F-2a(1) - All of the potential problems have not been addressed (see F-2a). *tank*
- F-2a(2) - This is incomplete because all of the areas have not been addressed (see F-2a).
- F-2b(1) - This is incomplete because the contamination system and the mobil tanks have not been addressed.
- F-2b(2) - Need a schedule for describing the daily monitoring of the monitoring equipment on the tanks and a procedure for emptying a tank to allow entry and inspection when necessary.
- F-2c - The inspection schedule must describe the procedure for taking remedial action when an inspection reveals a problem.
- F-2d - A date and time, the observations made, and the nature of repairs need to be included on the inspection logs
- F-3a(3) - Needs detail for the specific steam equipment and use of appropriate solvents for decontamination of the equipment.
- F-3a(4) - The maps show that there are two fire hydrants and the text says there are three. *emergency*
- F-4 - Prevention of the contamination of the water supplies and the migration of effects of equipment failure and power outages have not been addressed.
- F-5a - Grounding of drums during pumping and pump specifications with respect to sparking have not been addressed.
- F-5d - The procedures used to insure that the incompatible waste and materials are placed in the same containers are in an unwashed container that previously held incompatible waste have not been addressed.
- F-5f - The applicant does not address incompatible waste in tanks.

- G-1 - The facility name and location and the owner's name as well as a description of the facility operations have not been included in the contingency plan.
- G-2 - The name, address, office and home phone numbers, and the duties of the primary and alternate coordinators as well as a statement authorizing the designees coordination to commit the necessary resources to implement the contingency plan have not been included.
- G-3 - Criteria for implementing the contingency plan in a spill has not been addressed.
- G-4a - FDER phone number is for Suncom only.
- G-4c - A procedure of assessing the possible hazards to the environment and human health have not been addressed. The procedures for determining the need for evacuation have not been addressed. On spills, when would be necessary to notify the local authorities has not been addressed.
- G-4d - The emergency coordinator has not been notified for spills; explosions have not been addressed.
- G-4e - The removal and isolating of containers have not been described in fires, explosion or released to prevent spread or reoccurrence.
- G-4f - Decontamination after a fire has not been addressed. Procedures for deployment of the resources for the storage and treatment of the released materials have not been addressed.
- G-4j - There has not been any statement as to the repair of tanks.
- G-5 - Only two of the three fire hydrants are depicted on the site plan, and only eight of nine fire extinguishers are located on the site plan. The equipment listed on p. 39 is not given a location; there are no first aid and medical supplies mentioned; emergency communication or alarm systems have not been addressed.
- G-6 - A description of the cooperative agreement with the local police and fire departments, hospitals, has not been addressed in the plan. A statement that indicates that a copy of the contingency plan will be submitted to these organizations has not been mentioned.
- G-7 - There is no mention of any kind of evacuation plan.
- H-1a - Job duties and descriptions need to be supplied with each job title.
- H-1b - The type of training that each employee will receive and the frequency in which the employee will be receiving training has not been included.

- H-1c - Demonstration that the program is directed by a person trained in hazardous waste management has not been addressed.
- H-1e(1) - Documentation that adequate training for the procedures for the use, inspection, repair and replacement of facility emergency and monitoring equipment has not been addressed.
- H-1e(2)⁽³⁾⁽⁵⁾ - Training program outline must include key parameters for waste feed cutoffs, communication or alarm systems and response to groundwater contamination.
- H-2 - There is no indication that training will be successfully completed by facility personnel within six months of their employment.
- I-1c - Maximum inventory will be the amount of waste in the drums as well as in the tanks at the time of closure. There is no salvage value allowed.
- I-1d - There is no demonstration that decontamination has been effective.
- I-1d(1) - The disposal should address all 2,016 drums; contamination and disposal of the drums have not been addressed; verification of the decontamination has not been addressed; and the maximum inventory has not been addressed.
- I-1d(2) - The closure of the tanks has not been addressed in the fact that if the facility is down where it cannot be operated, the waste would not be able to go through the facility. This would cause the maximum inventory would have to include all the wastes that are stored in the tanks at the time of closure because there is no salvage value allowed. There is no verification that the decontamination has been completed.
- I-1e - The inspection schedule has not been addressed.
- I-4 - There is no salvage value credit, so the maximum inventory of the drums and tanks has to be included in the disposal costs.
- K - The certification by the professional engineer on all engineering drawings is not addressed.

B-1 2
 B-2 5
 B-3b 5
 B-3b(1) 5
 B-3b(1)(a) 5
 B-3b(1)(b) 5
 B-3b(2) 5
 B-4 1 & 5
 C-1 2
 C-1a 2
 C-1b 2
 C-2 2
 C-2a 2
 C-2b The test methods used needs to be
 referenced to SW 846
 C-2c See C-2b

C-2d Needs a description of the frequency at
 which the analyses will be repeated.

C-2e 2
 C-2f 2
 D-1a(1) 3
 D-1a(2) 2 & 3
 D-1a(3) 1, 2 & 3
 D-1a(3)(a) 1, 2 & 3
 D-1a(3)(b) 1, 2 & 3
 D-1a(3)(c) 1 & 3
 D-1a(3)(d) 1
 D-1a(4) 1 & 2
 D-2a 1, 2 & 4
 D-2b 1, 2 & 4
 D-2c 1, 2 & 4

F-1a(2)(b) Is office staff going to be able to provide the control for the entry

F-1a(3) Signs must be posted to be seen from any approach, not only a main gate.

F-2 1, 2, 4 & 5

F-2a(1) 1, 2, 3, 4 & 5

F-2a(2) 1, 3 & 4

F-2b(1) 1 & 3

F-2b(2) 1 & 4

F-2c 1, 2, 3, 4 & 5

F-2d The inspection logs needs to have date and time of inspection, name of inspector and date and nature of repairs.

F-3a(3) 1 & 2

F-3a(4)

The 3 fire hydrants are show on the map as 2.

F-4 1, 2, 3, 4 & 5

F-5a 2

F-5b 2

F-5c 5

F-5d 1 & 2

F-5e 2 & 4

F-5f 2

G-1 The Contingency Plan needs to have facility name, location, operator name and a description of the facility operations.

G-2

G-3 Criteria for implementation of the contingency plan needs to be provided

G-4(a) How will the facility personnel be notified of a spill or explosion?

G-4b 2

G-4c 1 & 2

G-4d 1, 2, 3, 4 & 5

G-4e 1, 2, 3 & 4

G-4f 1, 2, 3 & 4

G-4g 2

G-4h 3

G-4i 4

G-5 1 & 2

G-6 Need a statement indicating that a copy of the contingency plan has been submitted to local auth.

G-7 Needs an evacuation plan.

H-1a Needs job duties and description of each job title.

H-1b Needs frequency and technique used for each type of training along ~~with~~ with the content of the course.

H-1c Needs credentials of training director.

H-1e(1) 1 ~~1~~

H-1e(2) 1

H-1e(6) 1

H-2 Needs to indicate that training will be successfully completed in 6 months.

I-1c The maximum inventory of waste would be all the waste on hand when the facility closed.

I-1d Verification of decontamination.

I-1d(1) Needs to address all the waste in containers (ie 2016 drums). Verification of decontamination of drums & storage area.

I-1d(2) Needs to address all the waste in the tanks (ie 10 tanks @ 6400 gal). Verification of decontamination of tanks & containment system.

I-1e Needs to have an inspection schedule.

I-4 There can not be any salvage credit, so the facility has to have maximum inventory of 2016 drums and 10 tanks.

K Certification by professional engineer on all drawings, data and calculations.

Subject requirement	40 CFR section Nos.	References	Location in application	Comments
I-9 State Financial Mechanism	122.25(a)(18)			
I-9a Use of State-Required Mechanisms	264.149			
<p>Where a state has hazardous waste regulations with equivalent or greater liability requirements for financial assurance for closure and post-closure care, a copy of the state-required financial mechanisms, including the facility EPA ID number, name, address, and amounts of coverage. If a state assumes legal responsibility for compliance with closure, post-closure, or liability requirements or the state assures that the state funds are available to cover those requirements, then facility is in compliance and may include a copy of a letter from the state describing the state assumption of responsibility and including the facility EPA ID number, name, address, and amounts of liability coverage or funds for closure or post-closure care that are assured by the state. If state coverage is less than federal requirements (264.143, 264.145, and 264.147), then the owner or operator must provide demonstration of additional financial assurance mechanisms to equal federal requirements.</p>				N/A
I-9b State Assumption of Responsibility	264.150			
<p>If a state assumes legal responsibility for compliance with closure, post-closure, or liability requirements or the state assures that state funds are available to cover those requirements, then facility is in compliance and may include a copy of a letter from the state describing the state assumption of responsibility and including the facility EPA ID number, name, address, and amounts of liability coverage or funds for closure or post-closure care that are assured by the state.</p>				N/A
PART J - OTHER FEDERAL LAWS	122.25(a)(20) 122.12	Ref. 3		
<p>Demonstration of compliance if applicable with the requirements of applicable other federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, Fish and Wildlife Coordination Act.</p>				
PART K - CERTIFICATION	122.6(a) and (d)			
<ul style="list-style-type: none"> • Certification of application by a principal of the company. • Certification by professional engineer of all engineering drawings, data and calculations. 				OK not OK