

From: [Blandin, Norva](#)
To: ["Prokop, Daniel"](#)
Cc: [Eldredge, Susan F.](#); [Russell, Merlin](#); [Kothur, Bheem](#)
Subject: RE: FDEP Compliance Evaluation Inspection- HCC Pompano Beach Inspection 6/7/18 -EPA ID FLD984262410
Date: Friday, August 17, 2018 12:15:00 PM
Attachments: [image001.png](#)
[FW 2018 Cost Estimate Approval - Solid Waste Processing Facility HeritageCrystal Clean Plant City MRF WACS ID No. 42485.msg](#)

Good morning Daniel,

Any updates on the status of our noncompliance items? This facility has been out of compliance for **72 days**.

- **Ten day storage limit – This was fixed during the site visit by generating a daily waste log in order to better track containers, generators, waste streams and date in/out. Can you provide a copy of this new log?**
- Missing EPA ID of designated facilities- We are currently are reviewing are manifest procedures and are meeting with Transflo in particular to ensure that there are no mistakes as to where the waste was generated, who is the transporter and the final destination for the waste. Meeting with Transflo to take place week of 7/16/18.----- **Documentation is needed in order to determine that the facility returned to compliance.**
- Weekly drum inspections, number of containers and time/date inspected are undertaken weekly. **Please provide a copy of the weekly inspection logs for the last three years including last month. The logs must include the appropriate elements: name, date, time, # containers, description of the corrective actions taken.**
- Utilizing a Bill of lading for Hazardous Waste Shipments – It is HCC's interpretation that Very Small Quantity Generators waste shipments fall under exemption from manifesting under 40 CFR 262.14 **Conditions for Exemption for a very small quantity generator. You are completely right if all of your generators are VSQG's. However it was noted during the inspection that HCC was not using manifest for SQG's facilities. Therefore, HCC must need to revised the status of their generators and provide the appropriate documentation and manifests. Please, explain how HCC will resolve this issue and also, provide documentation that HCC corrected the issues. For example, during the inspection, the inspectors noted that multiple generators are SQG and HCC managed them and transported their wastes with Bill of Lading. Please provide a list of**

your generator and their EPA ID. This include for used oil and hazardous waste activities.

- **Status of the Closure activities – Please provide photos and status of the Closure activities in Pompano and when is expected to complete the closure. Our Division located in Tallahassee must be informed about your closure activities and updates.**

Please respond to this email within 7 days.

Best regards,



Norva Blandin, MSEM
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From: Prokop, Daniel <Daniel.Prokop@Crystal-Clean.com>

Sent: Monday, July 16, 2018 8:53 AM

To: Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Subject: HCC Pompano Beach Inspection 6/7/18

Dear Ms. Blandin:

This correspondence is in response to the findings that were documented during a inspection from the Department of Environmental Protection ("Department"), for the above referenced location which was conducted on June 7th, 2018.

Our responses to the findings during the site visit are as follows :

- Ten day storage limit – This was fixed during the site visit by generating a daily waste log in order to better track containers, generators, waste streams and date in/out.
- Utilizing a Bill of lading for Hazardous Waste Shipments – It is HCC's interpretation that Very Small Quantity Generators waste shipments fall under exemption from manifesting under 40 CFR 262.14 *Conditions for Exemption for a very small quantity*

generator.

- Utilizing corporate EPA ID number for manifesting ILR000130062. - HCC is registered with US DOT as an interstate transporter based in IL. Therefore, HCC transports materials in every state under our Elgin IL based EPA ID number, ILR 000 130 062. Certain states, such as FL, require a State registration to conduct various activities. HCC has completed the required notification (attached) and has indicated on each Form Name that HCC operates as a transporter under our Federal Transporter ID number ILR 000 130 062. At various HCC locations, we transport hazardous materials as a 10-day transporter, and accept those materials as a transporter. The shipping paper from generator to transporter acts as a point to point transportation document. These materials are then transferred onto another point to point shipping paper in which HCC is the offeror, offering the materials back into transport to the processing facility.
- Missing EPA ID of designated facilities- We are currently reviewing manifest procedures and are meeting with Transflo in particular to ensure that there are no mistakes as to where the waste was generated, who is the transporter and the final destination for the waste. Meeting with Transflo to take place week of 7/16/18.
- Weekly drum inspections, number of containers and time/date inspected are undertaken weekly.

Also in following up with our site closure proceeding for the tank farm, the City of Pompano Beach has issued our demolition permits and we have restarted work on site as of 7/9/18.

I've included the annual closure costs in an attachment and have sent an updated contingency plan in a previous email, I will follow up with results of Transflo meeting this week. I believe a copy of the action plan was sent in a previous email, please let me know if I need to resend.

Daniel Prokop

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