

Thursby, Kim

From: John Jones <johnmjonespe@gmail.com>
Sent: Friday, August 24, 2018 1:26 PM
To: Epost HWRS
Subject: Re: World Petroleum, Corp-Davie ;FLD 980 709 075;First Request for Additional Information (RAI)

I have received the information

Sent from my iPhone

On Aug 24, 2018, at 10:47 AM, Epost HWRS <EpostHWRS@dep.state.fl.us> wrote:

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



<8-24-18 World Petroleum Corp - RAI_Receipt.pdf>



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

August 24, 2018

Eric Miranda, President
World Petroleum, Corp.
4100 SW 47 Ave
Davie, Florida 33314
emiranda@wpcorp.net

RE: First Request for Additional Information (RAI)
Broward County – Hazardous Waste
Facility Name: World Petroleum, Corp. – Davie Facility
EPA I.D. Number: FLD 980 709 075
Current Permit Numbers: 54228-007-HO & 54228-006-SO
DEP Application Numbers: 54228-008-HO & 54228-009-SO

Dear Mr. Miranda:

Thank you for your application for the Used Oil and Material Processing Permit for the above referenced Facility. The Department has assigned DEP Application Numbers 54228-008-HO & 54228-009-SO to the application. A Department staff review of the application dated July 15, 2018, and DEP received on August 7, 2018 indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), 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, September 24, 2018, 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.

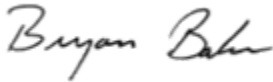
Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Bheem.kothur@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting

Mr. Eric Miranda
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the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Bheem.kothur@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at (850) 245-8781 or by e-mail at Bheem.kothur@floridadep.gov.

Sincerely,

A handwritten signature in blue ink that reads "Bryan Baker". The signature is written in a cursive, flowing style.

Bryan Baker, P.G., Administrator
Hazardous Waste Program and Permitting

Attached: List of Requested Information

cc:

Ashanti McBride, DEP OGC, ashanti.mcbride@floridadep.gov

Dawn Cinquino, DEP Headquarters, dawn.cinquino@floridadep.gov

Financial Assurance Working Group, DEP Headquarters,
financial.assurance.working.group@floridadep.gov

James Jarmolowski, DEP Headquarters, james.jarmolowski@floridadep.gov

Norva Blandin, DEP Southeast District, norva.blandin@floridadep.gov

Robert Berberena, DEP Southeast District, robert.berberena@floridadep.gov

John Jones, P.E., johnmjonespe@gmail.com

Attachment: List of Requested Information

Facility Name: World Petroleum Corp. – Davie Facility
EPA ID Number: FLD 980 709 075
Current Permit Number: 54228-007-HO & 54228-006-SO
DEP Application Number: 54228-008-HO & 54228-009-SO

Review Comments for Renewal of Used Oil Processing Facility Permit: The renewal application for a used oil processing facility has been reviewed with respect to the applicable requirements in Rule 62-710.800, F.A.C.; comments are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. Please note that there was no cover letter with the renewal permit application. It is always advisable to submit such a letter to advise the Department of any changes to the facility.
2. The renewal permit application did not use the appropriate application, dated April 23, 2013, but instead used your own. Please use DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date 4-23-2013.
3. **Application, DEP Form 62-710.901(6), Part I:**
 - a. Section A.1: Date current permit expires should be October 12, 2018.
 - b. Section B.1: Please indicate Section, Township, and Range.
 - c. Section C.2: Please review the Hazardous Waste Codes in this application and Form 8700-12FL, and revise as appropriate. Resubmit the Form 8700-12FL to the Department's Registration section.
 - d. Section B.3: Attachment is not included in the permit application and does not contain a detailed site map and tank table of the facility showing the location of all material and waste receiving areas, storage and processing areas (including tanks, containers, pipelines, and equipment), and waste traffic patterns for incoming and outgoing materials. The permit application contained several maps in other sections, including a site plan, however the font was either blurry, too small, or the map did not contain all the required information. Please submit a site map in an electronic format to be inserted into the permit that contains the above referenced items as applicable.
4. **Application, DEP Form 62-710.901(6), Part II:**
 - a. John Jones P.E., Certification did not include a mailing address or date.
5. **Attachment B, Facility Process Description, Rebuttal Presumption Verbiage:**

The Department has recently adopted the Federal Generator Improvements Rule into Chapter 62-730, F.A.C. effective June 18, 2018. The Conditionally Exempt Small Quantity Generator (CESQG) was changed to Very Small Quantity Generator (VSQG). A number of citations in 40 CFR 261 have also been changed and reorganized, and a review of the new rule is recommended. No revisions are required,

however please note these changes for future application and document submittals.

6. **Attachment F, Contingency Plan, Emergency Response, and Spill Prevention:**

These documents are very old and outdated as of July 2009. Please review, revise, update Emergency Telephone Numbers, Emergency Coordinators On-Site, Emergency Coordinators Off-Site and resubmit the entire documents. Emergency Coordinator is listed as Mr. John Jones Tel: 954-817-2273 or 479-353-1368. Please verify and be consistent. This document contains the older agency name of "Florida Department of Environmental Regulations". Please revise as appropriate.

a. **Section F, Emergency Spill Response Plan:**

(1) The contingency plan must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators in accordance with 40 CFR 279.52(b)(iv). This attachment is missing the addresses for emergency coordinators identified under the plan. Please provide the home addresses for all emergency coordinators at this facility. In addition, local authorities should be notified of any revised emergency contacts.

b. **Section F, Spill Containment Procedures:**

(1) The location and a physical description of emergency equipment and a brief outline of its capabilities is provided. Please either revise and include in a Figure / Table, or provide a map showing the location of all fire extinguishing systems in accordance with 40 CFR 279.52(b)(2)(v).

7. **Attachment H, Closure Plan:**

a. **Process Description and Types of Products Collected:** These sections indicate that the facility operates an Industrial Waste Oil and Oily Wastewater collection, transportation, processing and recycling business..." and receives "industrial *waste oils*." The Department believes the term "waste oil" was mistakenly used, as this term refers to used oil that has been mixed with hazardous waste, and is not interchangeable with the term "used oil". Please clarify and revise all affected attachments accordingly.

b. **Facility Closure Procedures:** Notification to the Department must be made in writing *at least 60 days prior* to the scheduled date of closing the facility. In addition, a certification of closure completion must be submitted within 30 days after closing the facility. Please revise this section in accordance with Rule 62-710.800(5)(d) & (e) respectively.

Review Comments for Renewal of 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.; comments are included below. Certain sections of the Used Oil Processing Facility application, submitted as a separate document, were found to contain items applicable to the Material Processing Facility application. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. The application form 62-701.900(4) was not properly completed. Please revise the application pursuant to Rule 62-701.710(2)(a), F.A.C. where the application did not contain a seal for John Jones, P.E. FL. Registration No. 50227. Please include the engineering seal on a replacement page to be included as part of the application.
2. The renewal application indicates that waste received daily will vary between 0 and 20 tons. Is this the maximum amount of solid waste to be stored at the facility? Please indicate how long it takes to process 20 tons of materials. Also, please indicate what steps are taken to prevent exceeding 20 tons of materials being stored at the facility at any given one time. Rule reference: 62-701.710(2)(a), F.A.C.
3. The renewal 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. Please submit a site plan that meets these requirements. Rule reference: 62-701.710(2)(b), F.A.C.
4. The renewal application did not include a boundary survey and legal description of the property. Please submit a boundary survey and legal description of the property. Rule reference: 62-701.710(2)(c), F.A.C.
5. 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), F.A.C.
6. Please revise the section entitled "Facility Closure Procedures" to reflect that the closure plan included in the Used Oil Processing Permit Application that has been submitted for this facility is intended to fulfill the closure requirements in Chapter 62-701.710(6). Rule reference: 62-701.710(2)(f) and 62-701.710(6), F.A.C.
7. The application did not include a contingency plan. Please revise the application to reflect that a contingency plan that complies with 62-701.320(16) and 62-701.710(2)(g) F.A.C. is included in the Used Oil Processing Permit Application that has also been submitted for this facility.

8. The application did not include any financial assurance documentation required by subsection 62-701.710(7), F.A.C. Please revise the application to reflect that financial assurance documentation that complies with 62-701.710(7), F.A.C. is included in the Used Oil Processing Permit Application that has also been submitted for this facility.
9. The application did not include a history and description of any enforcement actions by the applicant described in 62-701.320(3), F.A.C., relating to solid waste management facilities in Florida. Please submit this information.
10. The Solid Waste Closure Plan - Process Description section indicates that the facility operates a **waste oil** collection, transportation, processing and recycling business...” The Department believes the term “waste oil” was mistakenly used, as this term refers to used oil that has been mixed with hazardous waste, and is not interchangeable with the term “used oil”. Please clarify and revise all affected attachments accordingly. In addition, please refer to Used Oil review comment 7 above and revise as needed.

Citation Errors: Please note that multiple citation errors were observed in the permit application; while revisions of these items are not required, a thorough review and update of all referenced citations is recommended.