

From: [Mitchell, Cheryl L](#)
To: ["Glorioso, Vinnie"](#)
Cc: [Falls, Kevin](#)
Subject: RE: HCC Jacksonville FDEP inspection email 2
Date: Friday, June 1, 2018 5:32:00 PM
Attachments: [62-730_HAZARDOUS WASTE \(Notification req"ts\).doc](#)

Vinnie – the Closure Plan requirements are related to the Hazardous Waste Transfer Facility regulations in 62-730.171, FAC. I've attached that regulation with the particular section highlighted. As mentioned, there was a Closure Plan submitted in 2009 with the initial registration for the 103rd Street facility, although there were errors with that Plan (i.e., referenced the Port Everglades facility, not the 103rd Street one). Based on other sections within the 171 section that are related to updating information when changes occur at a facility, I believe that requirement would apply to the Closure Plan. I will check with our Transporter registration folks in Tallahassee since they are much more familiar with what constitutes a change, what portions of the registration/renewal information should be updated, and whether a Closure Plan is part of the update requirements that are referenced.

I'll follow-up with you next week after I discuss with the Tallahassee folks. Thank you,

r/
Cheryl

From: Glorioso, Vinnie <Vinnie.Glorioso@Crystal-Clean.com>
Sent: Friday, June 1, 2018 2:42 PM
To: Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Cc: Falls, Kevin <Kevin.Falls@Crystal-Clean.com>
Subject: HCC Jacksonville FDEP inspection email 2

Cheryl,

In yesterday's phone call you requested a closure plan for the Jacksonville, FL branch. Our Jacksonville, FL branch is not a used oil processor, but a used oil transporter/transfer facility (see attached permit).

I looked up the FL regulation **62-710.800 Permits for Used Oil Processing Facilities** and it appears closure plans are applicable for used oil processors. We have closure plan for our HCC Plant City facility because Plant City is a used oil processor, but we are not a used oil processor in Jacksonville.

(5)(a) The owner or operator of a **used oil processing facility** shall have and submit to the Department as part of its permit application a **written closure plan** to show how the facility will be closed to meet the following requirements:

Can you cite the specific Florida regulation for a closure plan for a used oil transporter/transfer facility or let us know if Jacksonville is exempt from a closure plan? Thanks

Vinnie N. Glorioso, CSP, CHMM
Regional Manager- Environmental, Health and Safety

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