

## Thursby, Kim

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**From:** Kothur, Bheem  
**Sent:** Wednesday, March 20, 2019 8:57 AM  
**To:** Thursby, Kim  
**Cc:** Kothur, Bheem  
**Subject:** FW: Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO  
**Attachments:** HCC Pompano 10 Day Renewal Submittal.pdf

Hi Kim,  
Scott Crandall is responded through an email what I requested in the document of dated march 14, 2019.  
Please accept this as a response to your Epost.

Thanks,

Bheem

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**From:** Scott Crandall <scrandall99@gmail.com>  
**Sent:** Thursday, March 14, 2019 2:54 PM  
**To:** Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>  
**Cc:** vinnie.glorioso@crystal-clean.com; Anita.Decina@Crystal-Clean.com; Horlick, Susan <Susan.Horlick@dep.state.fl.us>  
**Subject:** RE: Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO

Bheem

As requested in your below email, attached is the requested information in support of HCC's Pompano Facility's 10-day transfer renewal.

The 8700 FL-12 with updated address  
A closure plan for the 10 day facility  
Contingency and Spill Response plan  
Updated Training log for all HCC Pompano Employees  
A revised site plan showing the new limits of the site.

No changes are occurring in regards to the 10 day transfer operations as a result of the smaller site. HCC's 10 day operations will continue on a drum-in, drum out basis with all drums being place into transport trailers immediately upon arrival at the facility. No warehousing of drums, bulking or consolidation of wastes occurs at the site. All the operations are located on pavement and bermed for spill containment purposes. There are no changes to this from the previous FDEP authorization for the 10-day permit.

An SPCC will not longer be maintained for the site since HCC no longer does any bulk or storing of oil at the site. All drums and tank trucks are transportation related and governed by DOT thus exempt from the SPCC plan requirements. We will of course maintain the Contingency and Spill Response plan we have provided.

Please let us know if you need any additional information.



**Scott Crandall, PE**

204 37<sup>th</sup> Ave N, #435

St Petersburg FL 33704

813-335-5341 cell

[Scrandall99@gmail.com](mailto:Scrandall99@gmail.com)

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**From:** Horlick, Susan <[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)>

**Sent:** Wednesday, March 13, 2019 9:50 AM

**To:** [Scrandall99@gmail.com](mailto:Scrandall99@gmail.com); [vinnie.glorioso@crystal-clean.com](mailto:vinnie.glorioso@crystal-clean.com); [Anita.Decina@Crystal-Clean.com](mailto:Anita.Decina@Crystal-Clean.com)

**Cc:** Ashwood, Janet <[Janet.Ashwood@dep.state.fl.us](mailto:Janet.Ashwood@dep.state.fl.us)>; Baker, Bryan <[Bryan.Baker@dep.state.fl.us](mailto:Bryan.Baker@dep.state.fl.us)>; Perrigan, Glen

<[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Blandin, Norva

<[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>; Fisch, Ben <[Ben.Fisch@dep.state.fl.us](mailto:Ben.Fisch@dep.state.fl.us)>

**Subject:** FW: Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO

Hi Scott,

We agree that the EPA ID number **FLD984262410** need not be changed for the Pompano Beach location. You have not moved. I issued the HWT registration yesterday on that ID number but since then Bheem Kothur discovered that your operating permits have expired. You need to provide the documents outlined below ASAP.

Contact Bheem Kothur for any questions.

*Susan Horlick*

Florida Department of Environmental Protection  
Permitting and Compliance Assistance

850-245-8778

[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)

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**From:** Kothur, Bheem

**Sent:** Wednesday, March 13, 2019 9:32 AM

**To:** Horlick, Susan <[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)>; Perrigan, Glen <[Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us)>; Fisch, Ben

<[Ben.Fisch@dep.state.fl.us](mailto:Ben.Fisch@dep.state.fl.us)>

**Cc:** Baker, Bryan <[Bryan.Baker@dep.state.fl.us](mailto:Bryan.Baker@dep.state.fl.us)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Ashwood, Janet

<[Janet.Ashwood@dep.state.fl.us](mailto:Janet.Ashwood@dep.state.fl.us)>; Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>

**Subject:** FW: Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO

Hello Susan,

If you think, we need the following information from the facility to continue the proposed activities, please forward this to the appropriate HCC, Contact person(s), ASAP.

Facility can not operate without these approvals, because the permit is expired, and all the referenced documents are null and void.

Thanks,

Bheem

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**From:** Kothur, Bheem

**Sent:** Tuesday, March 12, 2019 4:10 PM

**To:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>

**Subject:** FW: Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO

Hello Scott,

I have received your request, reviewed and have the following comments:

1. Facility UO and Solid permits are expired on October 20, 2017. Now facility is closed,
2. The Closure Report is under review.
3. In the meantime to continue and using the facility, you need to submit the revised DEP Form 8700-12FL. Including Closure Plan, Contingency Plan, Emergency Response, SPCC, Training, and Site Plan with Containment for the Planned Activities at the facility.

If you have any questions, please let me know.

Bheem

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**From:** Scott Crandall <[scrandall99@gmail.com](mailto:scrandall99@gmail.com)>

**Sent:** Monday, March 11, 2019 5:51 PM

**To:** Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Baker, Bryan <[Bryan.Baker@dep.state.fl.us](mailto:Bryan.Baker@dep.state.fl.us)>

**Cc:** Horlick, Susan <[Susan.Horlick@dep.state.fl.us](mailto:Susan.Horlick@dep.state.fl.us)>; Glorioso, Vinnie <[Vinnie.Glorioso@Crystal-Clean.com](mailto:Vinnie.Glorioso@Crystal-Clean.com)>; 'Decina, Anita' <[Anita.Decina@Crystal-Clean.com](mailto:Anita.Decina@Crystal-Clean.com)>

**Subject:** Address change and Closure - Heritage Crystal Clean - Pompano Facility Operating Permit Numbers: 51348-009-HO / 51348-010-SO

Bheem

As a follow-up to our phone conversation today regarding HCC closure of the Pompano UOP, continuing operations and address change, I offer the following:

Only the used oil processing permit (UOP 51348-009-HO / 51348-010-SO) is being closed out. All other operation will continue. HCC will continue to operate its Used oil Transfer, Filter Transfer, Universal Waste Transfer, Mercury Transfer and 10 day Hazardous Waste Transfer businesses from the site. Also there are no changes to the location of the 10 day transfer operations and/or storage of drums. HCC continues to operate on a drum-in drum out basis in the same location at the site as always. The portion of the site HCC no longer occupies was where the used oil processing and storage tanks were located. I have attached an aerial photo from the Broward Cty Property appraiser with the parcel ID and showing the limits of the site HCC now leases.

As discussed in introduction of the closure plan submitted by PSI, HCC has sold the property and leased back the eastern half of the site from the current landowners. Originally it was HCC's intent to move its operations further South, however after an exhaustive search, no sites were located in the Broward/Dade market that met the State's setback requirements for siting a 10 day transfer facility, thus HCC was forced to remain at its current locale.

As a result of the new owner re-deeding the property there is an address change at the site. When the property was owned by HCC it encompassed three contiguous parcels along 48<sup>th</sup> ST NE. These three lots had the following addresses; 1250, 1280 and 1300 48<sup>th</sup> St NE. The re-deeding combined lots 1280 and 1300 into one lot with the address of 1300 NE 48<sup>th</sup> St. Historically HCC and its predecessors operated its business using the 1280 address for mailing purposes. This included registering for the existing EPA ID number for the site. When HCC attempted to update the address via the 8700-12FL form, we were instructed to apply for a new EPA ID. This gave HCC pause due to the difficulty of siting a new 10-day transfer location. The 10-day transfer operations are tied to the existing EPA ID and is grandfathered in. Our concern would be that initiating a new EPA ID would cause HCC to lose the grandfather Status on the 10 day transfer authorization. The site would not qualify if a new authorization were required.

**Please advise on how best to proceed to insure that the 10 day transfer permit remains viable.**



**Scott Crandall, PE, FLAC**

**204 37<sup>th</sup> Ave N, #435**

**St Petersburg FL 33704**

**813-335-5341 cell**

**[Scrandall99@gmail.com](mailto:Scrandall99@gmail.com)**



## Thursby, Kim

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**From:** /O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7413839EC0A24212B3420B8453290984-THURSBY\_K  
**Sent:** Thursday, March 14, 2019 12:19 PM  
**To:** 'Anita.Decina@Crystal-clean.com'  
**Cc:** Baker, Bryan; Walker, Kim (Waste); McBride, Ashanti; Eldredge, Susan F.; Dilmore, Cory; Blandin, Norva; Irwin, Alannah; 'lydia.wing@psiusa.com'; 'angela.garzia@psiusa.com'; 'daniel.prokop@crystal-clean.com'; 'scrandall99@gmail.com'; Kothur, Bheem  
**Subject:** Heritage Crystal Clean, Pompano; FLD 984 262 410; Facility Site Closure Assessment Report dated January 22, 2019  
**Attachments:** 3-14-19 HCC Pompano - Site Closure AR Letter dated March 13 2019.pdf.Receipt.pdf

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](mailto: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](http://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



# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

March 14, 2019

Anita Decina, President  
Heritage Crystal, Inc.  
105 S. Alexander Street  
Plant City, Florida 33563  
[Anita.Decina@Crystal.com](mailto:Anita.Decina@Crystal.com)

RE: **Facility Site Closure Assessment Report dated** January 22, 2019  
Heritage Crystal Clean, Pompano Facility; FLD 984 262 410

Dear Ms. Decina:

The Department has reviewed the above referenced document regarding the site closure assessment of the Used Oil and Material Processing facility located at 1280 NE 48<sup>th</sup> St, Pompano Beach, Florida. The assessment addresses the requirements for closure of a Used Oil permitted facility under Chapter 62-710, Florida Administrative Code (F.A.C.).

Based on the Soil Assessment Results, no soil staining or petroleum odors were noted in any of the soil samples collected during soil boring or well installation activities. No OVA-FID responses above 10 ppm were measured in the soil screening samples from the 16 soil borings performed in various areas of the property. Based on the laboratory results for the two soil samples collected, no contaminants were detected above the soil cleanup target levels (SCTLs) in Chapter 62-777, Florida Administrative Code (FAC).

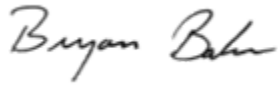
Groundwater samples were collected from TMW-1, MW-2, MW-3 and MW-4; no contaminants were detected; above the groundwater cleanup target levels in Chapter 62-777, FAC.

Based on these results, the Department considers that the closure activities required by your permit have been met.

Please revise any necessary changes and submit the following documents an 8700-12FL notification form, Closure Plan, Contingency and Emergency Plan, Preparedness and Prevention Plan, Site Plan, and demonstration of financial assurance as required by 62-730.170, FAC, by April 15, 2019.

Should you have any questions, please contact Bheem Kothur, P.E., at 850-245-8781 or via email at [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Bryan Baker". The signature is fluid and cursive, with the first name "Bryan" and last name "Baker" clearly distinguishable.

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

BB/bk

cc:

Ashanti McBride, DEP OGC, [ashanti.mcbride@floridadep.gov](mailto:ashanti.mcbride@floridadep.gov)  
Susan F. Eldredge, DEP Headquarters, [susan.eldredge@foridadep.gov](mailto:susan.eldredge@foridadep.gov)  
Cory Dilmore, DEP Headquarters, [cory.dilmore@floridadep.gov](mailto:cory.dilmore@floridadep.gov)  
Norva Blandin, DEP Northeast District, [norva.blandin@floridadep.gov](mailto:norva.blandin@floridadep.gov)  
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Daniel Prokop, Heritage Crystal-Clean, Inc., [daniel.prokop@crystal-clean.com](mailto:daniel.prokop@crystal-clean.com)  
Scott Crandall, P.E., FLAC, Husky Corp, [Scrandall99@gmail.com](mailto:Scrandall99@gmail.com)