

**Florida Department of
Environmental Protection**

Memorandum

TO: Lee Hoefert/Solid Waste Supervisor
THRU: Paul Wierzbicki/Waste Cleanup Supervisor
FROM: Lee Martin/Waste Cleanup Section

DATE: FEB 21 1997

REF: Rinker MRF Permit Application
Miami, FL

I have reviewed the referenced document submitted January 28, 1997, received January 29, 1997, and offer the following comments:

1. Page 10 of the Report; The applicant proposes to remove metals from the post treatment testing protocol. Since the coal gasification process has been known to concentrate the metals in the coal tar, more so than petroleum contaminated soils, how will the permittee ensure the metals concentrations in the coal tar contaminated soils to be processed do not exceed the limits for "clean soil" established in 62-775.400 before or after processing?
2. Atch IV; Which process will be used? The narrative provided for the Soil Reduction Method does not match (no discussion of thermal desorption) the flow chart provided in the attachment.
3. Atch V; Do the organizations responsible for the sampling and analytical work have current ComQAPs? The ComQAP approval letters provided for the field sampling and laboratory organizations are not current (ComQAPs are renewed every 5 years and the ComQAP for Groundwater Specialists, Inc. #880557 has been canceled).
4. Atch VII; Why are copies of the expired permit SO13-195017 and the Notice of Intent to modify the expired permit included? These conditions have been included in the current general permit SO13-290034, to construct/operate a soil thermal treatment facility.
5. Atch VIII; Why are the wells currently monitored at the site not included in the plan? Note the site plan in Atch IX does include all wells currently monitored. Recommend a summary table which includes the wells and surface water locations currently monitored, parameters, and frequency to eliminate confusion through the historical data where wells have been abandoned and added when the soil storage area moved.
6. Atch VIII; How will the Groundwater Monitoring Plan included with the application safeguard against the potential spread of environmental contamination from the treatment of coal-tar contaminated soils?

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In order to complete review of your application pursuant to Section 403.087(4), Florida Statutes (F.S.), Sections 62-701, and 62-4.070(1), Florida Administrative Code (F.A.C.), please provide the following information.

1. On page 5 of 36 of the application, Part A., number 13, entitled "General Information", please provide the anticipated number of tons/day of contaminated coal tar soils based upon the hours/year operation received at this facility.
2. On page 5 of 36 of the application, Part A., number 16, entitled "General Information", please provide the estimated closing costs for this facility.
3. On page 8 of 36 of the application, Part C., number 11 and number 12, entitled "Materials Recovery/ Volume Reduction Facility General Information, the applicant states that the normal processing rate will be 350,400 tons/year. Please provide the normal processing rate and maximum processing rate expressed in tons/day extrapolated from the tons/year along with the design criteria and expected performance of the equipment to be utilized at this facility.
4. On page 8 of 36 of the application, Part C., number 15, entitled "Materials Recovery/ Volume Reduction Facility General Information, the applicant has placed an "X" next to "Other" for the type of material that will be recovered. The application specifically requests that you provide the number of "tons/week" for each material to be recovered. Please provide this information.
5. On page 10 of 36 of the application, Part D., numbers 7, 8, 9b, 9c, 9d, 10, 12, 13 and 14, entitled "Solid Waste Management Facility Permit General Requirements", the applicant marked this as "N/A". Please submit this documentation as required.
6. On page 34 of 36 of the application, Part S., number 1, entitled "Materials Recovery Facility Requirements", the applicant didn't submit a closure cost estimate for this facility. Please submit a closure cost estimate that is signed and sealed by a professional engineer registered in the State of Florida. This estimate must be based upon a third party performing the work and should include the minimum documentation below:
 - a. The estimate must be based upon a third party performing the work which includes, loading costs, hauling costs, treatment and disposal costs;
 - b. Please provide the source(s) of information as to how these estimates were determined; and
 - c. The estimates should be based upon all the unprocessed coal tar waste stockpiled onsite (86,400 tons located in Storage Buildings A and H) as the worst case scenario;
7. On page 34 and 35 of 36 of the application, Part S., numbers 2.b(3), 2.b.(8) and 2.c.(1) through (4), entitled "Materials Recovery Facility Requirements", the applicant didn't submit this documentation. Please submit these documents/information accordingly.
8. Please provide a scaled Site Plan that delineates this facility including Storage Buildings A and H as discussed in Attachment III. There are several Site Plans in the application that have different origination dates that conflict with each other.
9. In Attachment III, entitled "Pre-Treatment and Post-Treatment Soils Storage Area Design", section Leachate Collection System, paragraph one states that Rinker is requesting a modification to their General Permit to move the leachate collection system currently located inside of the southeast corner of the Materials Storage Building. Please be advised, that if you are requesting to modify your General Permit as stated herein, you must submit a separate letter and processing fee to our office concerning this item. This application cannot edify the General Permit.
10. Please respond to the comments from the Waste Cleanup Section dated > attached to this letter.

Note that all submittals must be signed and sealed by a professional engineer

Mr. Michael D. Vardeman
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