

Thursby, Kim

From: Kothur, Bheem
Sent: Tuesday, February 26, 2008 8:56 AM
To: Tripp, Anthony
Cc: Thursby, Kim; Prusty, Rabin
Subject: FW: Rinkers Materials NOD Responses Dated February 13, and Received on February 14, 2008

FYI

As for as their NOD responses are concerned, we have received on 2/13/08. It is in the processes of review and sending the documents to Oculus.

That's all

Bheem Kothur, P.E., DEE
Hazardous Waste Regulations Section
Florida Department of Environmental Protection
MS# 4560, 2600 Blair Stone Road
Tallahassee, Florida 32399-2400
850-245-8781, Suncom: 205-8781, FAX: 850-245-8810
Email: Bheem.Kothur@dep.state.fl.us

From: Kothur, Bheem
Sent: Friday, February 22, 2008 3:22 PM
To: Winston, Kathy; Prusty, Rabin
Subject: RE: Rinkers Materials NOD Responses Dated February 13, and Received on February 14, 2008

Hi Kathy,

I mailed a complete copy of revised application to your attention through inter departmental mail on February 18, 2008. Please let me know ASA you receive it.

Thanks.

Bheem Kothur, P.E., DEE
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850-245-8781, Suncom: 205-8781, FAX: 850-245-8810
Email: Bheem.Kothur@dep.state.fl.us

From: Winston, Kathy
Sent: Wednesday, February 20, 2008 11:58 AM
To: Kothur, Bheem; Prusty, Rabin
Subject: RE: Rinkers Materials NOD Responses Dated February 13, and Received on February 14, 2008
Importance: High

I cannot tell whether they answered my questions because they only copied me on their letter and not the revised application or its' attachments. If you could scan that document to me or let me know if it is already in Oculus I can check I whether they have met the requirements.

Kathy Winston
Environmental Consultant
Hazardous Waste Compliance/Enforcement
(561)681-6756
SunCom 226-6756
Fax (561)681-6770

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From: Kothur, Bheem
Sent: Wednesday, February 20, 2008 8:24 AM
To: Winston, Kathy; Prusty, Rabin
Subject: Rinkers Materials NOD Responses Dated February 13, and Received on February 14, 2008

Hi Kathy,
We have received the above subject NOD Responses. Please review and let me know your response and any further comments..
Thanks.

Bheem Kothur, P.E., DEE
Hazardous Waste Regulations Section
Florida Department of Environmental Protection
MS# 4560, 2600 Blair Stone Road
Tallahassee, Florida 32399-2400
850-245-8781, Suncom: 205-8781, FAX: 850-245-8810
Email: Bheem.Kothur@dep.state.fl.us

Thursby, Kim

From: Epost HWRS
Sent: Wednesday, January 16, 2008 12:52 PM
To: 'mvardeman@rinker.com'
Cc: Kantor, Karen E.; Winston, Kathy; Clarke, Raoul; Wick, Fred; Posner, Augusta; 'fbergen@kooglerassociates.com'; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Rinker Materials of Florida, Inc.;FLD 981 758 485;56307-HO-003
Attachments: 1-16-08- Rinker Permit Application NOD.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Tracking:

Recipient	Delivery	Read
'mvardeman@rinker.com'		
Kantor, Karen E.	Delivered: 1/16/2008 12:57 PM	Read: 1/16/2008 3:09 PM
Winston, Kathy	Delivered: 1/16/2008 12:57 PM	Read: 1/16/2008 4:14 PM
Clarke, Raoul	Delivered: 1/16/2008 12:57 PM	
Wick, Fred	Delivered: 1/16/2008 12:57 PM	
Posner, Augusta	Delivered: 1/16/2008 12:57 PM	Read: 1/16/2008 2:59 PM
'fbergen@kooglerassociates.cor		
Bahr, Tim	Delivered: 1/16/2008 12:57 PM	
Prusty, Rabin	Delivered: 1/16/2008 12:53 PM	Read: 1/16/2008 1:22 PM
Kothur, Bheem	Delivered: 1/16/2008 12:57 PM	
Clarke, Raoul	Delivered: 1/16/2008 12:53 PM	Read: 1/16/2008 1:10 PM
Bejnar, Tor	Delivered: 1/16/2008 12:57 PM	
Redig, Michael	Delivered: 1/16/2008 12:57 PM	
Tripp, Anthony	Delivered: 1/16/2008 12:57 PM	



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 16, 2008

SENT VIA E-MAIL
mvardeman@rinker.com

Mr. Michael D. Vardeman
Cement Division Environmental Manager
Rinker Materials of Florida, Inc.
1200 NW 137 Avenue
Miami, Florida 33182

RE: Rinker Materials of Florida, Inc.
EPA ID Number: FLD 981 758 485
Permit Number: 56307-HO-003
Notice of Deficiency

Dear Mr. Vardeman:

The Florida Department of Environmental Protection (Department) has received your renewal permit application dated December 11, 2007 to operate a Used Oil Processing Facility at 1200 NW 137 Avenue, Miami, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Michael D. Vardeman
January 16, 2008
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp

Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Kathy Winston, DEP/West Palm Beach, kathy.winston@dep.state.fl.us
Raoul Clarke, DEP/Tallahassee, raoul.clarke@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Augusta Posner, DEP/Tallahassee, augusta.posner@dep.state.fl.us
Fawn Bergen, Koogler & Associates, Inc., fbergen@kooglerassociates.com

ATTACHMENT
January 16, 2008
Rinker Materials of Florida, Inc.
EPA I.D. No. FLD 981 758 485
Notice of Deficiency

General Comments

1. **Renewal Permit Application:** Rinker Materials of Florida, Inc., Miami must submit a standalone document with detailed and updated site specific information for the revised renewal permit application inserting page number on each page.
2. The text on the figure under Rev-2 Att. 1-Facility Diagram is not readable. Please provide a bigger Facility Diagram. For the tanks identified in the Facility Diagram as closed, please provide what was stored on those tanks and when the tanks were closed.
3. **Site Map and Tank Table:** Please provide a site map (8 ½"x11") in electronic format (PDF) identifying all tanks and also a tank table (8 ½"x11") in electronic format (PDF). Please send the map and tank table via e-mail, so that the map and tank table can be attached to the permit. Also include hard copies of the map and tank table with your response.

Specific Comments

1. **Attachment 2: Facility Operation, Activities conducted:** The statement under bullet three should read "Thermal treatment of petroleum-contaminated soil "and" non-hazardous coal tar contaminated soil. Please revise as appropriate.
2. **Attachment 3: Detailed Process Description:** The test performed for the incoming loads does not meet the requirements of a Waste Analysis Plan per Parts 270.14(b)(30), 264.13(b)(c) and 268.7 as there is no indication of sampling methods, frequency (refers to per load; how big is load) and it does not provide test methods for metals analysis. Neither does it meet Subpart G; the Rebuttable Presumption per Part 279.63, as it does not indicate equipment used calibration methods and frequency, sampling methods, or frequency (how many gallons between sampling), etc.
3. **Emergency Preparedness Section:** The Emergency Preparedness Section does not specifically mention explosions per Part 264.52(a) or a spill control plan per Part 264.52(b). Please review and revise as appropriate.
4. **SPCC Section:** The SPCC Section does not specify whether on scene line supervisor or operations manager can allocate funds for spill cleanup if beyond scope of facility response team per Part 264.55. Please revise as appropriate.

5. The telephone numbers of the nearest fire station, police station and hospital should be provided, not just 911 per Part 262.34. Please revise as appropriate.
6. **Security:** Issue of surveillance, signage, barriers, etc., per Parts 264.14 & 270.14(b)(4) should be addressed in the application. Please revise the application.
7. **Emergency Preparedness and SPCC:** As per Parts 264.52(e) and 262.34, the facility should provide a list of emergency equipment with location, description and capabilities.
8. **Personnel Training:** As per the requirements Parts 270.14(b)(12) and 264.16, attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. Please revise as appropriate.
9. **Unit Management:** Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection including a schedule for general facility inspection, and monitoring schedules and corrective actions. As per Parts 262.34, 264.174 and Rule 62-730.160(6), the facility should inspect the containers weekly and keep a copy of the inspection log at the site.
10. **Facility Closure Plan:** Attach a copy of the facility's Closure plan and schedule.