

Thursby, Kim

From: Kothur, Bheem
Sent: Monday, September 15, 2008 1:23 PM
To: Thursby, Kim
Cc: Neves, Richard
Subject: FW: Hydrocarbon Recovery Services, Inc.-(d.b.a. FCC Environmental);FLD 065 680 613;30676-HO-005
Attachments: 8-19-08-HRSI NOD Plant City Letter & Attachment.pdf

Hi Kim,

Please see below the e-mail that came from Kelli Winter, HRSI on 8/27/2008, asking a question in NOD dated 8/19/2008 and I replied to this e-mail also.

This means they have received the NOD letter.

Please let me know if you need anything else.

Thanks you.

Bheem

From: Kothur, Bheem
Sent: Wednesday, August 27, 2008 4:06 PM
To: 'Winter, Kelli'
Cc: Jones, Carol; Neves, Richard
Subject: FW: Hydrocarbon Recovery Services, Inc.-(d.b.a. FCC Environmental);FLD 065 680 613;30676-HO-005

Hi Kelli:

As you know and I also discussed this matter with Carol Jones last week explaining in detail through teleconference call and giving references of Rule 62-762.511 Performance Standards, specially for Aboveground Storage Tank Systems, item 3, with reference to API Standard 653, since tanks are nearly more than 30 years old.

I hope this should help you. If you have any further questions, please let me know.

Thanks.

That's all

Bheem

From: Winter, Kelli [mailto:Kelli.Winter@fccenvironmental.com]
Sent: Wednesday, August 27, 2008 3:17 PM
To: Kothur, Bheem
Subject: FW: Hydrocarbon Recovery Services, Inc.-(d.b.a. FCC Environmental);FLD 065 680 613;30676-HO-005

Mr. Kothur,

Good day. I have a question concerning the attached Notice of Deficiency for the Used Oil Processing Permit submitted for our Plant City facility. Under General Comments #5, it asks for documentation of the last thickness and tank integrity assessment performed by a PE registered in the state of Florida. Is there a specific method FDEP is requiring or a specific regulation that you can refer me to for further information? Thank you for your time.

Have a great day!

Kelli Winter
Environmental Health & Safety Manager, Southeast
FCC Environmental

105 S. Alexander Street
Plant City, FL 33563
813-754-1504 ext. 3129 office
813-478-0282 cell
813-764-8914 fax

"Forgiveness is the single most important key to achieving happiness."

Confidentiality Note: This e-mail message and any attachments to it are intended only for the named recipients and may contain confidential information. If you are not one of the intended recipients, please do not duplicate or forward this e-mail message and immediately delete it from your computer.

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]

Sent: Tuesday, August 19, 2008 12:54 PM

To: Jones, Carol

Cc: Dregne, James; Honey, Kelly; Wick, Fred; Winter, Kelli; jack.thornburgh@fccenvironmental.com; Coyne, John; Bahr, Tim; Neves, Richard; Kothur, Bheem

Subject: Hydrocarbon Recovery Services, Inc.-(d.b.a. FCC Environmental);FLD 065 680 613;30676-HO-005

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

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



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

August 19, 2008

SENT VIA E-MAIL

Carol.jones@fccenvironmental.com

Ms. Carol Beth Jones, PE
Hydrocarbon Recovery Services, Inc.
(d.b.a. FCC Environmental)
105 South Alexander Street
Plant City, Florida 33563

RE: Hydrocarbon Recovery Services, Inc.
(d.b.a. FCC Environmental)
EPA I.D. No. FLD 065 680 613
Permit Number: 30676-HO-005
Used Oil Processing Facility Permit
Notice of Deficiency

Dear Ms. Jones:

The Florida Department of Environmental Protection (the Department) has received your permit renewal application dated July 16, 2008 to operate a Used Oil Processing facility at 105 South Alexander Street, Plant City, Florida 33563.

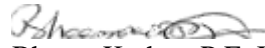
The review of the permit renewal application indicates that it is incomplete. Please provide the information requested in the enclosed attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the 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 (two copies to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southwest District office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Ms. Carol Beth Jones, PE
August 19, 2008
Page Two

Should you like to arrange a meeting or if you have any questions, please contact Rick Neves at (850) 245-8755, e-mail: richard.neves@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rn

Enclosure: Attachment

cc: James Dregne, DEP/Tampa, james.dregne@dep.state.fl.us
Kelly Honey, DEP/Tampa, kelly.honey@dep.state.fl.us
Fred, Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Kelli Winter, HRSI/Plant City, kelli.winter@fccenvironmental.com
Jack Thornburgh, HRSI/Plant City, jack.thornburgh@fccenvironmental.com
John Coyne, HRSI/ Houston, john.coyne@fccenvironmental.com

ATTACHMENT
August 19, 2008
Hydrocarbon Recovery Services, Inc.
Plant City, Florida
EPA I.D. Number: FLD 065 680 613
Notice of Deficiency

GENERAL COMMENTS

1. FCC Environmental is a DBA and not a legal entity name. The legal entity name of the permit applicant, as submitted on the permit transfer and in the financial assurance, is Hydrocarbon Recovery Services, Inc. (HSRI). Please ensure that any and all references to the name of the applicant indicate HSRI, and not FCC Environmental, throughout the entire permit (e.g. the SPCC plan, etc.).
2. The application contains no photographs of the facility showing locations of receiving, processing and storage areas. Also, there is no diagram showing the current traffic flow information. Please review and revise as appropriate.
3. The Detailed Site Plan currently shows the shaker screen near the solid waste (SW) processing area. Is this where the shaker screen is currently located? Was it moved to the secondary containment next to Tank 630? Please review and revise as appropriate.
4. Please provide both a hard copy and electronic formatted (PDF) copy of both the Tank Table 1 (Attachment 1, Page 1-5) and Site Map {Attachment 2, Detailed Site Plan (8 1/2" X 11")}. Please send the electronic formatted copies of both the Tank Table and the Site Map via e-mail so that they both can be attached to the Intent to Issue Permit.
5. Tank inspection: The facility must provide documentation of the last detailed inspection and certifications for all tanks to the Department. Some of the tanks appear to be nearly 30 years old. Please provide documentation of when the last thickness and tank system integrity assessment was performed by a professional engineer registered in the state of Florida.

SPECIFIC COMMENTS

Certification

1. Please provide a letter stating that Kenneth D. Cherry is authorized to sign as Operator, Facility Owner and Land Owner.

Attachment 1: Facility Description

1. Page 1-3, First line, last paragraph: The citation for “oily waste” should be 62-710.201 (not 62-701), F.A.C. Please correct this citation as appropriate.

Attachment 2: Process Description

1. Page 2-3, Used Oil Filters: Line 4 of this section states “Uncrushed drums of filters...” Should this read “Drums of uncrushed filters...?” Please amend this sentence as appropriate.

Attachment 3: Waste Analysis Plan

1. Page 3-1, first sentence of the last paragraph: The citation for “oily waste” should be 62-710.201 (not 62-701), F.A.C. Please correct this citation as appropriate.

2. Page 3-3, Absorbents, Filters, and Oily Waste, paragraph 1. This section states that, prior to pick-up, the driver will “verify that the material contains visible, free flowing oil.” The Department had assumed that the wastes addressed in this section would not contain free flowing oil. Please review and, if necessary, revise this section as applicable. Please explain what procedure will be followed when:

1. The material does not contain free-flowing oil; and
2. The material does contain free-flowing oil.

3. Page 3-4, Used Antifreeze, paragraph 1: For used antifreeze that is going to be processed with the used oil, the Southwest District will not accept a generator’s certification based on process knowledge. If the generator is going to claim the used antifreeze is non-hazardous, the claim must be based on an analysis. Please review and revise as appropriate.

Attachment 5: Tracking Plan

1. Page 5-1, Tracking Plan, paragraph 4: Change “40 CFR 279.74” to “40 CFR 279.56(b)”.

Attachment 6: Preparedness and Prevention Contingency Plan/SPCC Plan/EAP

1. Page 6-2, paragraph 6: There is no Appendix A in the Emergency Action Plan (EAP). There are “exhibits” in the EAP, but none of these show the location of emergency equipment, spill containment equipment, and emergency communication equipment. Please delete the reference to Appendix A and revise as appropriate.
2. Page 6-3, Record Keeping and Reporting: The fax number for the Southwest District is (813)632-7664. Please correct this number.
3. Preparedness and Prevention Contingency Plan versus the Spill Prevention, Control and Countermeasure (SPCC) Plan: SPCC, page ii. There seems to be some confusion between notification instructions between the Contingency Plan and the SPCC Plan. The SPCC Plan says to notify the Branch Manager if there is a release and the Contingency Plan says to notify the Emergency Coordinator. The wording in each of these documents needs to be consistent. Please review and revise as appropriate.
4. SPCC Plan, page 6: Rule 62-762.601(2)(g), F.A.C. requires that tanks and tank systems have monthly visual inspection (a form of leak detection). This information can be found on Page 7-2 (Unit Management), but must also be included in the SPCC Plan. Please review and revise accordingly.
5. SPCC, page 9, Table 1: Please change “62-761” to “Rule 62-762, F.A.C.” as 62-762 only exempts the tanks from secondary containment requirements.
6. SPCC, page 23, Section 16.0, Limitations: Please change all references to U.S. Filter to HRSI.
7. EAP, page 19, paragraph 10.4. This section notes that Siemens Water Technology Corporation is the primary cleanup contractor. Please review and revise this information as appropriate.
8. EAP, page 19, paragraph 10.10. The location of emergency equipment is not shown on Evacuation Route diagram. Please revise this section and provide the required information accordingly (see comment number 1 above).
9. EAP, page 26, Exhibit IV. Please review and correct any and all references to Siemens Water Technologies Corp Hydrocarbon Recovery Services, Inc. throughout this document.

Attachment 8: Closure Plan

1. Page 8-2, Verification of Closure Performance Standard:

a) Paragraph 2: The EPA methods should be 6010C, 8260B and 8270D. Please revise accordingly.

b) Paragraph, 3: Please review, edit, and correct any and all typographical errors in this section.

2. Page 8-7, paragraph 4: Please change "62-777-170" to "62-777.170" (period vs. dash).

3. Page 8-7, paragraph 2: Please change "62-780" to "62-777, F.A.C."

4. Page 8-8, Table 2, Closure Cost Estimate: The total closure cost estimate, as of 2008 for the HRSI Plant City facility appears to be combined costs for both solid waste and used oil in this Used Oil Permit Application. Please revise this table and resubmit the cost estimate for the approved amount of Used Oil activities only since Solid Waste closure cost estimates are separate from the Used Oil closure cost estimates.