

Parker, Bill

From: Gephart, Albert
Sent: Monday, November 24, 2003 10:08 AM
To: Parker, Bill; Kothur, Bheem
Cc: Tam, Stanley
Subject: Cliff Barry 2nd NOD

RMC QA'ed
Initials _____ Date _____

As discussed

Sincerely,

AFG

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SWD Comments On The Cliff Berry Response (9/2/03) To The 1st NOD (7/28/03)

Site Information

Please submit a standard USGS contour map extending 2,000 feet beyond the property boundaries of the facility site. The map shall include the map scale and date; any 100-year flood plain area (include a copy of the FIA or FEMA map); and the orientation of the map.

Analysis Plan

Procedure C, Page 3, second paragraph, does not thoroughly describe the sampling and management of tanks of processed used oil to be dispatched from the facility. The Department would like to see explicit verbiage added to the Plan that Cliff Berry will isolate each tank (batch) of processed used oil; analyze the contents (batch) of used oil, with no further addition of used oil; and, if on-spec, release the tank (batch) contents for shipment off-site. Sampling would be required for each tank (batch) of processed used oil.

Procedure C references Appendix A for a detail of sampling procedures. The sampling procedure in Appendix A, page 6, "Loading-Zone Sampling Method", is not an acceptable method for determining on-spec used oil (see discussion above regarding the isolation of tanks (batches).

Procedure C, Page 3, fourth paragraph. The Table should include the testing for polychlorinated biphenyls (PCB).

The facility is to provide a description of the management of sludges, residues and by-products. This is to include the characterization analysis as well as the frequency of the removal of the sludge.

Tracking

The facility shall submit examples of its tracking documentation. This can be in the form of a manifest or Bill of Lading that contains the required acceptance and delivery information. Also, please submit a print-out of the Wixel templates (the various screens in the software) and a sample of the data input to illustrate the tracking mechanism and recording shipments of used oil into and out of the facility. The facility's annual used oil report is not a sufficient means for the tracking requirement.

Attachment E

Cliff Berry is to submit drawings and calculations that demonstrate that the facility (tank farm) will meet the secondary containment requirements.

The facility shall submit a description of the facility's unit management plans as outlined on page 5, Item #8, in Part I of the "General Instructions To Apply For A Used Oil Processing Facility Permit", including a plan for the removal of released material (within 3 days of the incident) and accumulated precipitation (within one week after a rainfall event) from secondary containment.

Attachment F

The facility shall revise and submit its Closure Plan. The current Plan does not address all of the requirements listed on page 6, Item #9, in Part I of the "General Instructions To Apply For A Used Oil Processing Facility Permit".

Attachment G

The facility shall submit a written training program. The training tracking documents in Appendix G is not a “stand-alone” training program.

***** Have we resolved the drinking water well issue with the church? The church had a potable well within the 500 foot safety range.***