

Thursby, Kim

From: McCaustland, TJ [TMcCaustland@STERICYCLE.com]
Sent: Wednesday, December 05, 2012 11:09 AM
To: Epost HWRS
Subject: RE: Stericycle Specialty Waste-Miami;Initial Transfer Facility Notification for SSWSI Miami Area 51

Received. Thank you

T.J. M^c Caustland

Environmental Safety & Health Manager - East Region
Cell: 770-891-2531

From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Monday, November 26, 2012 12:38 PM
To: McCaustland, TJ
Cc: Bahr, Tim; Goddard, Charles; Kantor, Karen E.; Winston, Kathy; Tripp, Anthony
Subject: Stericycle Specialty Waste-Miami;Initial Transfer Facility Notification for SSWSI Miami Area 51

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

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**FLORIDA DEPARTMENT OF
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RICK SCOTT
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SECRETARY

November 26, 2012

Sent Via E-mail:

TMcCaustland@STERICYCLE.com

T.J. McCaustland
Environmental, Safety, and Health Manager
SSWSI-East Region
5158 Ashley Drive
Covington, Georgia 30014

Subject: Initial Transfer Facility Notification for SSWSI Miami Area 51.

Mr. McCaustland:

The Department of Environmental Protection has received the referenced submittal of November 02, 2012 for the initial notification of a 10-day hazardous waste transfer facility to be located at 8505 Northwest 74th Street, Miami, Florida. After review of the document there are a number of items that need to be addressed prior to issuing approval for operation of this facility.

1. There are several different storage capacities listed in the application. The 8700-12 form has 1000 55-gallon drum equivalents. The operations description mentions 1000 pallets, or 4000 55-gallon drum equivalents along with three 53-foot trailers. The trailers are listed as having a capacity of 26 pallets, with 8 55-gallon drums per pallet for a total of 1872 drums. Added to this would be the capacity of inbound trucks to bring the on-site capacity to 6000 55-gallon drum equivalents. By our calculations, the three 53-foot trailers with 26 pallets, each with 8 55-gallon drums would only amount to 624 drums. It is not clear where the additional 1400 drum equivalents will come from. The area of the warehouse is listed as 10,000 square feet. Each pallet is approximately 16 square feet in area which would make for a maximum of 625 pallets in the warehouse. This does not include providing adequate aisle space, storage for CESQG material, storage for non-hazardous material, office space, or the space required to maneuver equipment for moving pallets in and out of the warehouse. Please review the document to obtain a reasonable, maximum, operating capacity for this facility.
2. The Facility Diagram provided in the operations descriptive section needs to include dimensions, or a scale bar needs to be provided. This diagram also needs to indicate where the 10-day hazardous waste, the Conditionally Exempt Small Quantity Generator waste, and the non-hazardous material will be stored within the warehouse.

3. The Closure Plan at this time will need to include confirmatory sampling. While the exact sampling locations do not need to be specified at this time, please include two general sampling locations to take soil samples down to groundwater and then sample the groundwater. Current protocol is to sample the top 6-inches, then at two feet, and every two feet depth after that to groundwater. At the time of closure these requirements may change due to operational considerations.
4. For the Contingency Plan, any incident reports will also need to be submitted to the Florida Department of Environmental Protection, Hazardous Waste Environmental Coordinator since Florida is an authorized state. With regard the placement of hazardous waste, per 40 CFR 264.176, any ignitable or reactive waste shall require a 50 foot buffer from all exterior property boundaries. In the Employee Actions section, second paragraph, first sentence, please change the word “expected” to “required” as all employees will be required to wear the proper PPE when working with hazardous waste.
5. Contingency Plan Hurricane response: Please include a copy of SSWSI OP-201 Hurricane Preparedness plan for our records. This plan should include the operational details for the handling of all hazardous waste during the hurricane response.
6. Contingency Plan, Return to Operations: Prior to return to operations, the contingency plan shall be reviewed and revised if necessary to address the emergency and to prevent re-occurrence of that event.

As noted previously, approval to operate a 10-day transfer facility cannot be issued until these items are addressed. Submittal of electronic documents will be sufficient, unless the 8700-12 requires modification. In that case, follow the directions for submittal of that form along with an electronic copy of the responses.

Should you have any questions, please feel free to contact me at (850) 245-8766 or at anthony.tripp@dep.state.fl.us.

Sincerely,



Anthony R. Tripp, Ph.D. P.E.
Hazardous Waste Regulation Section

cc: Karen Kantor, FDEP/Southeast District - Karen.E.Kantor@dep.state.fl.us
Kathy Winston, FDEP/Southeast District – Kathy.Winston@dep.state.fl.us