

Thursby, Kim

From: Montinique Buquoi [Mbuquoi@synergyrecycling.org]
Sent: Thursday, December 06, 2012 3:43 PM
To: Epost HWRS
Subject: Received email

Thursby, Kim

From: Epost HWRS
Sent: Tuesday, November 27, 2012 9:07 AM
To: 'mbuquoi@synergyrecycling.org'
Cc: Bahr, Tim; Goddard, Charles; Winston, Kathy; Kantor, Karen E.; 'epaul@synergyrecycling.org'; Miller, Randy J.; Bejnar, Tor; Martin, Lee; Kothur, Bheem; Tripp, Anthony
Subject: Ricky's Oil & Environmental Services, LLC;FLD 981 019 755;First Request for Additional Information
Attachments: 11-27-12-Ricky's Oil & Environmental Services, LLC.Receipt.pdf
Tracking:

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. (An automatic "reply message" is not sufficient to verify receipt). 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



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD
JR.

SECRETARY

November 27, 2012

SENT VIA E-MAIL

mbuquoi@synergyrecycling.org

Ms. Montinique Buquoi, Office Manager
Ricky's Oil & Environmental Services, LLC
7209 NW 66th St
Miami, Florida 33166

RE: Ricky's Oil & Environmental Services, LLC
EPA I.D. No: FLD 981 019 755
Permit Number: 61835-HO-006/61835-SO-007
Used Oil and Material Processing Facility Permit
First Request for Additional Information

Dear Ms. Buquoi:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated October 25, 2012 and received on October 29, 2012 to operate a Used Oil and Material Processing Facility in Miami, Florida.

The review of the permit 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.

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Ms. Montinique Buquoi, Office Manager

November 27, 2012

Page Two

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit two hard copies of your written response (one copy to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southeast District Office) and one electronic copy to Tallahassee. 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.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: Kathy Winston, FDEP/West Palm Beach, kathy.winston@dep.state.fl.us
Karen Kantor, FDEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Paul Elliott, Ricky's Oil & Environmental Services, epaul@synergyrecycling.org
Randy Miller, OGC/Tallahassee, randy.j.miller@dep.state.fl.us
Tor Bejnar, FDEP/Tallahassee, tor.bejnar@dep.state.fl.us
Lee Martin, FDEP/Tallahassee, lee.martin@dep.state.fl.us

ATTACHMENT

**Ricky's Oil & Environmental Services, LLC
Miami Facility, Florida
EPA I.D. No. FLD 981 019 755
Permit No. 61835-HO-006; 61835-SO-007
First Request for Additional Information**

November 27, 2012

General Comments:

1. Please provide the Table of Contents for the permit application.
2. A. General Information, Part I, Completed Used Oil Processing facility Permit Application Form, A.1. Renewal, Page 8: The Facility is submitting the complete application for permit renewal, not for the initial permit. Also, identify the permit expiration date. Please review the General Instructions for completing the permit application (available at http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-710/710_6.pdf) and revise as appropriate. This should also be labeled as Revision Number 1.
3. A. General Information, Part I, Completed Used Oil Processing Facility Permit Application Form, A.3. Applicable Subparts, Page 8: The Facility should identify all applicable subparts. Please review the General Instructions for completing the permit application and revise as appropriate.
4. B. Site Information, Part I, Facility Location, Completed Used Oil Processing Facility Permit Application Form, B.1. Section, Page 9: Please correct the spelling for the nearest community and also identify the section number as 14. Please review the General Instructions for completing the permit application and revise as appropriate.
5. B. Site Information, Part I, Facility Location, Completed Used Oil Processing Facility Permit Application Form, B.2. Section, Page 9: Please verify the correct facility size (0.70 acre or 0.72 acre?). Please review and revise as appropriate.
6. C. Operating Information, Part I, Completed Used Oil Processing Facility Permit Application Form, C. 1. through C.10. Operating Information, Pages 10 and 11: Please identify all the attachments as appropriate. Also identify the hazardous waste generator status (CESQGs) and if applicable identify the EPA hazardous

waste codes. Please review the General Instructions for completing the permit application and revise as appropriate.

7. Part II, Attachment B, Process Flow Description, Fifth Paragraph, Last Sentence; Attachment D, Sludge, Residue and Byproduct Management Description, Second Paragraph: The application indicates that the oily rags/absorbents are processed for energy recovery. FDEP understood that these were being sent to the landfill so please describe exactly your procedure for processing these items. Also, the sludges from the units used to filter product prior to tank storage are mixed with their oily waste rolloff and sent for off-site management. FDEP would like to know if a hazardous waste determination has been conducted on any of these sludges to demonstrate that this is appropriate management for these wastes. Please review these two Attachments and revise as appropriate.
8. Spill Prevention, Control, and Counter Measure (SPCC) Plan, dated October 2012, Sub-Section 6.1.2, Fleet Vehicles and Attachment B, Process flow Description, first Paragraph: These two paragraphs appear to be inconsistent. Please review and revise as appropriate. Also in Attachment B, Paragraph Six, last sentence. Please identify Table I for AST details.
9. SPCC Plan, Sub-Section 6.1.4, Product Storage and Disposal: When discussing how recovered product is used the facility mentions "or disposed of otherwise at an appropriate facility". If this oil is going for disposal then the generators would have to count this used oil as hazardous waste toward their generation status because the exemption from it being hazardous waste depends on the fact that it is being recycled. If this is hazardous waste you would also be operating a non-permitted hazardous waste treatment, storage, and disposal facility. Please clarify your activities.
10. SPCC Plan, Sub-section 7.2, Reporting [40 CFR Part 112.7 (a)(4) and (a)(5)], Second Line: Please change the phrase "in turn" to the word "intern".
11. SPCC Plan, Sub-Section 9.1, Emergency Response Procedure, Third Line: Please correct the spelling of the word as "facility's" not "facilities".
12. SPCC Plan, Sub-Section 9.4, Emergency Contacts, Last Line: The phrase "an or any" should instead be "and".
13. SPCC Plan, Sub-Section 9.7, Reporting/Record Keeping, First Line: Please change "facilities" to "facility". Also, please use the correct name for the Miami-Dade former DERM as it is now known as the Department of Permitting,

Environmental and Regulatory Affairs (PERA). Please review and revise as appropriate.

14. Section 11.0, Security (112.7(g)): There is no mention of the appropriate signage that is required at the facility. Please review this section and revise as appropriate.
15. Attachment 6, Tanks & Drum(s), Tanks 4 and 8 –“Wet Oil”: Tanks 4 and 8 were described as holding “Wet Oil”. Per regulations there is no such thing, therefore the tanks need to be labeled properly and changed in this document, as well.
16. Attachment 6, Tanks & Drum(s), and Figures 2, and 3: Please review and verify the capacities of tanks 4, 7, 8 and figures and be consistent. Also, the tank table shows a tank 12 with a capacity of 55 gallons as New Oil (15-w-40). However, the tank 12 is not identified on the two figures. Is Tank 12 actually a tank or a container of product? You do not need to list containers of product on your tank table. Please review the figures and revise as appropriate.
17. Figures 2 and 3: Facility had an oil water separator, used oil filter roll off area, and oily rags roll off area. Please review these activities and revise these figures as appropriate.
18. Attachment 7, Emergency response Equipment; Attachment B, Process Flow Description, First Paragraph: There is a discrepancy concerning the number of trailer rig tankers the facility has. In Attachment B there were two trailer rig tankers identified, but Attachment 6 and 7 identify only one. Please review these Attachments and revise as appropriate.
19. Completed Solid Waste Processing Facility Permit Application DEP Form 62-701.900(4), Item 15, Page 2 of 4: The item refers to part of the solid waste application that addresses the expected volume of waste to be received for which the facility has indicated zero tons per day. Please revise this item and identify the quantities.
20. Complete Solid Waste Processing Facility Permit Application DEP Form 62-701.900(4), C. Certification By Applicant and Engineer or Public Officer, Item 1. Applicant, Page 4 of 4: Please include the Signature of Applicant or Agent.
21. Please identify non-hazardous and solid waste activities conducted at the site and address the quantities of solid waste stored on site at any given time per day and per month.

22. Attachment B, Detailed Process Description, Second Paragraph: Ricky's Oil & Environmental, Services, LLC accepts Coolants (Antifreeze), and Petroleum Contact Water (PCW), which is oily wastewater. However, in Attachment G, Spill Control and Emergency Procedures (SPCC), Table 1- Summary of Storage Locations are not identified. Please review the Table 1 and revise as appropriate. Also, any oily wastes or sludge generated at the facility that cannot be managed for energy recovery will require a hazardous waste determination and the materials shall be managed in accordance with 40 CFR Part 279.10 (c) and (e).
23. Attachment C, Waste Analysis Plan: Please add these constituents to the existing list as appropriate. The maximum Halogens 4,000 ppm and PCB 2 ppm maximum to the Table. Also revise the Total Halogens 1,000 ppm maximum instead of 4,000 ppm maximum.
24. Solid Waste Processing Permit Application Form 62-701.900(4), F.A.C., Figures 2 and 3: Please describe in detail and indicate on the site plan where the drums/containers of non-hazardous solid wastes will be stored before and after processing (in Figure 2 and 3, is this area inside secondary containment)? Will the containers be covered? How long will they be stored on site prior to disposal? What will be the maximum throughput for solidification/consolidation of non-hazardous solid wastes? How many drums/containers will be stored on site at any one time for closure cost estimate purposes?
25. Attachment E, Waste Analysis Plan, & Material Profiling, Section 7.0 Antifreeze and Coolants: The current Florida DEP Used Antifreeze Guidance document is dated May 22, 2012. Please access the web to view the latest document at: http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/Antifreeze-Guidance_2012.pdf
26. Attachment C, Waste Analysis Plan: Does Ricky's Oil & Environmental Services (ROES), LLC, sign manifest as a generator? Depending on the amount of waste, ROES may become a large quantity generator (LQG). Please show on a map where this waste will be stored until transported off-site.
27. Attachment C, Waste Analysis Plan : Absorbents, Filters, And Oily Wastes, Oily Contaminated Solids and Sludges: Please describe and identify where these materials are stored.
28. Attachment E, Waste Analysis Plan, Industrial Wastewater: Please include the information regarding industrial wastewater in this application. It must be made

clear that the permit being applied for does not grant any authority to handle or dispose of industrial wastewater. Also explain and identify where and how industrial wastewater will be stored at this site. Please identify the units.

29. Attachment, F, Description of Sludge, Residue, and By-Product Management: Please show on a map where this activity will be conducted. Please ensure that the sludges are also tested similarly?
30. Attachment E, Tracking Plan: Please specify what materials (used oil?). Please attach the example of the "Shipping" document and "Daily Tank Inventory" document. Please review and revise as appropriate.
31. Preparedness and Prevention Plan: Please describe the Preparedness and Prevention Plan. Also show the location of all emergency equipment on a map.
32. Preparedness and Prevention Plan: Please update the FDEP West Palm Beach District Bureau of Emergency Response's (BER) phone number to read (561) 393-5877 and the office is located in Boca Raton. The address is: 7251 West Palmetto Park Road, Suite 303, Boca Raton, Florida 33433. Please add this information to the emergency contact list.
33. Preparedness and Prevention Plan, Notification and Reporting, Page 9-1 and 9-2: The FDEP district office physical address and mailing address are the same. The address is: Southeast District Office, 400 N Congress Ave, 3rd floor, West Palm Beach, Florida 33401. Please add the mailing address as appropriate. Also add the EPA Emergency Phone Number: 404-562-8700.
34. Contingency Plan & Emergency Procedures, Page 9-1: Please identify the addresses of the Primary Emergency Coordinator and Alternate Emergency Coordinator to the SPCC Plan. Also include your outside cleanup contractor information here.
35. Attachment I, Closure Plan: Attach a copy of the closure plan and schedule in detail. The closure plan should also include the Solid Waste Processing facility closure. Also address how many drums of non-hazardous waste will be stored at any one time for cost estimate purposes? The closure plan should also include detailed closure information for used oil tanks, including schedules. Please add this attachment.
36. Attachment I, Closure Plan. All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.

37. Attachment I, Closure Plan, Closure of Tank Farm Containment: Please describe the decontamination process and how a completion determination will be made.
38. Attachment I, Closure Plan, Closure Cost Estimate: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items. Please revise the closure estimates and submit for approval.
39. Attachment J, Employee Training Plan: Please attach a copy of the facility's employee training for used oil management. The employee training program should include USDOT hazardous materials training. Used oil is commonly contaminated with gasoline, and the mixture may be flammable. The ROES used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor-D-Tect kits will not assess the flammability of the materials ROES may be called upon to transport. Please see that the employee training program does include USDOT hazardous materials training also. The employee training plan also needs to specify that the written training records, including name of the employee, date and type of training, will be kept at the site for the require period of time.
40. Tank Inspection: The tanks were installed in the year 1952. The facility must provide documentation of the tank's last detailed inspection and certification to the Department. Please explain in detail the last time the thickness test was performed and a tank system integrity assessment was performed according to API 653 Code in-service inspection and engineering evaluation by a professional engineer registered in the State of Florida. Also, the facility must specify in the application the frequency of sludge removal from the tanks.
41. Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can inserted into the permit.
42. Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this table can be inserted into the permit.
43. Solid Waste Renewal Permit Application dated October 18, 2012 and DEP Received on October 29, 2012: The facility described the solid waste operations as bulking and solidification of oily waste and petroleum impacted soil and groundwater, with reference to the used oil application for further details. However, the information provided in the used oil application with respect to the bulking, solidification, and management of non-hazardous oily wastes are

not adequate to address these items. Please review and provide additional details for these items as appropriate.

44. Used Oil and Solid Waste Processing Permit Renewal Application, dated October 29, 2012: The submitted permit application is not properly paginated, rather it is confusing except for the "Spill Prevention, Control, and Counter Measure (SPCC) Plan, dated October 2012" Sections. Please review the entire application, revise, and paginate as appropriate.
45. ROES should provide the piping diagrams for all tanks and process equipments.
46. Attachment 4, Secondary Containment Calculations: The calculations were prepared on October 23, 2007. Please update the secondary containment calculations for the tank storage area since tank capacities have changed with the addition of tanks 11 and 12. These calculations need to be certified by a professional engineer registered in the State of Florida.