

## Thursby, Kim

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**From:** Kothur, Bheem  
**Sent:** Wednesday, July 24, 2013 11:06 AM  
**To:** Thursby, Kim  
**Subject:** FW: FCC Environmental, LLC, Plant City;FLD 065 680 613;Notice of Deficiency

Kim,  
For your information.

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**From:** Crandall, Scott [<mailto:scott.crandall@fccenvironmental.com>]  
**Sent:** Wednesday, July 24, 2013 11:03 AM  
**To:** Kothur, Bheem  
**Subject:** RE: FCC Environmental, LLC, Plant City;FLD 065 680 613;Notice of Deficiency

Received

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**From:** Kothur, Bheem [<mailto:Bheem.Kothur@dep.state.fl.us>]  
**Sent:** Wednesday, July 24, 2013 8:33 AM  
**To:** Crandall, Scott  
**Cc:** Thursby, Kim  
**Subject:** FW: FCC Environmental, LLC, Plant City;FLD 065 680 613;Notice of Deficiency

Hi Scott,  
Please respond to this e-post ASAP.  
Thanks.  
Bheem

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**From:** Epost HWRS  
**Sent:** Wednesday, July 17, 2013 12:27 PM  
**To:** [scott.crandall@fccenvironmental.com](mailto:scott.crandall@fccenvironmental.com)  
**Cc:** Bahr, Tim; Goddard, Charles; Knauss, Elizabeth; Eldredge, Susan F.; Miller, Randy J.; Bejnar, Tor; Kothur, Bheem; Tripp, Anthony  
**Subject:** FCC Environmental, LLC, Plant City;FLD 065 680 613;Notice of Deficiency

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](mailto: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](http://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](mailto:epost_hwrs@dep.state.fl.us)

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).*



July 17, 2013

## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

### SENT VIA E-MAIL

[Scott.crandall@fccenvironmental.com](mailto:Scott.crandall@fccenvironmental.com)

Mr. Scott Crandall, Regional EH&S director  
FCC Environmental, LLC  
105 South Alexander St  
Plant City, Florida 33563

RE: FCC Environmental, LLC, Plant City Facility  
EPA I.D. No: FLD 065 680 613  
Permit Number: 30676-HO-007  
Used Oil Processing Facility Permit Application  
Notice of Deficiency

Dear Mr. Crandall:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated June 17, 2013 and received on June 19, 2013 to operate a Used Oil Processing Facility in Plant City, 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.

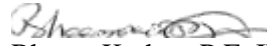
The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This 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.

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

Mr. Scott Crandall, Regional EH&S Director  
July 17, 2013  
Page Two

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](mailto:Bheem.kothur@dep.state.fl.us)

Sincerely,

  
Bheem Kothur, P.E. III  
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc:

Elizabeth Knauss, FDEP/Southwest District, [elizabeth.knauss@dep.state.fl.us](mailto:elizabeth.knauss@dep.state.fl.us)  
Susan Eldredge, FDEP/Tallahassee, [susan.eldredge@dep.state.fl.us](mailto:susan.eldredge@dep.state.fl.us)  
Randy Miller, DEP/Tallahassee, [randy.j.miller@dep.state.fl.us](mailto:randy.j.miller@dep.state.fl.us)  
Tor Bejnar, FDEP/Tallahassee, [tor.bejnar@dep.state.fl.us](mailto:tor.bejnar@dep.state.fl.us)

**ATTACHMENT**  
**July 17, 2013**  
**FCC Environmental, LLC**  
**Plant City Facility, Florida**  
**EPA I.D. No. FLD 065 680 613**  
**Permit No. 0030676-HO-006**  
**Notice of Deficiency**

**REVISED DRAFT**  
**General Comments:**

1. Permit Renewal Application Cover Letter dated June 17, 2013: The subject facility should be “FCC Environmental, LLC, Plant City Florida Facility” instead “FCC Environmental, LLC, Pompano Beach Florida Facility”. Please review and correct the subject cover letter as appropriate in future correspondence.
2. Used Oil Processing Facility Permit Application, Part I, and Part II - Certifications: It appears that the facility used the “Used Oil Processing Facility Permit Application Form Effective Date June 9, 2005” instead the facility should use the latest Permit Application Form Effective Date April 23, 2013. Please access the web to view the latest document at. [http://www.dep.state.fl.us/waste/quick\\_topics/forms/documents/62-710/710\\_6.pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-710/710_6.pdf)
3. Used Oil Processing Facility Permit Application, Part I, C.2 – Operating Information: This facility should not be managing electroplating wastes, EPA Wastes F006 and F007. Please explain what management activities have been conducted related to these wastes.
4. Attachment 1, Page 1-1, Facility Description, Third Paragraph, First Sentence: Rail car loading and unloading operations and their secondary containment are not described. Please describe in detail these activities.
5. Attachment 1, Page 1-5, Table 1: Please include your PCW tanks in the tank table.
6. Attachment 1, Facility Description, Figure 1, Site Vicinity Map: The site vicinity map is not legible. Please submit the site vicinity map showing the site location by using a more recent aerial map, focusing more on the facility.
7. Attachment 1, Figure 2, Site Plan: Please indentify the location of Tank D5K, and PCW Tanks on Figure 2. Also, in the west Tank Farm the tank should be labeled as “Tank C3” instead of “Tank C5”. Please review the Figure 2 and revise as appropriate.
8. Figure 2, Site Plan, Dated June 5, 2013, and Figure 4, Evacuation Routes and Assembly Area, Dated February 11, 2008: It appears that these two figures are different. Please contact Bheem Kothur to discuss possible revisions to these maps.

9. Attachment 1, Page 1-1, Facility Description, Fourth Paragraph, First Sentence, Figure 2, Site Plan and Table 1, Summary of Above Ground Storage Tanks, Page 1-5: Your 2008 permit application and the permit site plan included two (2) shaker screens. The current application and site plan do not show any shaker screens. Please explain or identify the missing shaker screens.
10. Attachment 2, Process Description, Page 2-1, Fourth Paragraph, Last Sentence: Tank 5 is not included in this process. Please review this sentence and revise as appropriate.
11. Attachment 2, Process Description, Antifreeze, Page 2-3: The description of the antifreeze process state the majority of glycol as it remains with the re-refined “oil product”. This form of recycling is considered disposal under the Best Management Practices document referenced in the Waste Analysis Plan on Page 3-4. Therefore either Page 2-3 should be revised to indicate whether an additional form of antifreeze recycling is occurring or Page 3-4 should be revised to indicate that no characteristically hazardous antifreeze will be accepted for processing. If antifreeze or other hazardous waste from conditionally exempt small quantity generators is accepted after mixture with used oil, please explain how FCC Environmental Services, LLC will confirm the customer’s rate of generation.
12. Attachment 1, Process Description, Figure 2, Attachment 6, Figure 2, Site Plan and Drainage Map, Attachment E, Exhibit II, Figure 1-K, Evacuation Route Maps are different. Please contact Bheem Kothur to discuss possible revisions to these maps.
13. Attachment 2, Process Description, Page 2-3, Used Oil Filters, Second Sentence: There is not a Site Map at the end of this attachment showing the location where the drummed oil filters are stored. Please include the attachment or review this sentence and revise as appropriate.
14. Attachment 3, Waste Analysis Plan, Page after Page 3-6, On-Specification Claim, 40 CFR 279.11, on-Specification Criteria: The Rebuttable Presumption Analysis Flow Chart was included in your 2008 application and is missing in your current application. Please explain and/or provide Rebuttable Presumption Analysis Flow Chart to the Application. Also identify the page number as 3-7.
15. Attachment 3, Waste Analysis Plan, Page 3-6, On-Specification Claim, Third Sentence, Second Line: Please revise the sentence to read “.....is sampled daily for RCRA and Clean Air Act regulated fuel parameters prior to sale.....”
16. Attachment 3, Waste Analysis Plan, Page 3-5, Industrial Wastewater, Second Paragraph, First Sentence: Information regarding the facility’s centralized wastewater treatment permit under the Clean Water Act should be referenced in this section, if non hazardous industrial wastewater are accepted for treatment. What categories of wastewaters are accepted? Is the facility’s permit under Subcategory A (metals), B (oils), C (organics), or D (multiple waste streams subcategory)? Also, it must be clear

that the used oil processing 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.

17. Attachment 4, Sludge, Residue, And Byproduct Management Description, Page 4-1, First Paragraph, Last Sentence: It appears that the sampling was conducted about 20 years ago to determine the waste stream to be non-hazardous. The existing waste stream analysis is too old. The proposed annual analysis is not acceptable. However, the hazardous waste determination should be made biannually instead of annually to verify any changes in the documented TCLP parameters.
18. Attachment 4, Sludge, Residue, And Byproduct Management Description, Page 4-1, Third Paragraph, First Sentence: Please show on a map of the facility where this activity will be conducted. Please ensure that the sludges are also tested similarly?
19. Attachment 4, Page 4-1, Third Paragraph, First Sentence: The referenced rule (Chapter 62-713.501(4)) does not exist. What did you intend to cite? If your intention was to cite Chapter 62-713, Florida Administrative Code, keep in mind that this Chapter is for the treatment of petroleum contaminated soil, not sludges or residues. Please review and revise as appropriate.
20. Attachment 6, Preparedness and Prevention Contingency Plan: Please include a map of the facility showing the location of all emergency equipment.
21. Attachment 6, Preparedness and Prevention Contingency Plan, Page 6-3, Record Keeping And Reporting, State & Local Agencies: Please update the FDEP Tallahassee (normal business hours) phone number to read (850) 245-8707, the State Warning Point (24 hour-spill contact) phone number to read (800) 320-0519, and the EPA Emergency Response (Atlanta) phone number to read (404) 562-8700.
22. Attachment 6, Preparedness and Prevention Contingency Plan, Page 6-3: The FDEP district office physical address and mailing address are the same. Please delete the mailing address and revise as appropriate. In addition, please note that the district telephone numbers are in the process of changing. An announcement of the new numbers will be forthcoming within a month.
23. Attachment 6, Preparedness and Prevention Contingency Plan, Page 6-5, Emergency Contacts: Please add the Oil Spill Contractor name and their emergency contact phone number to the list. Also, add the local addresses for all Emergency Contacts to the list.
24. Attachment 6, Fire Protection and Emergency Action Plan, Item 10.4, and 10.8, Page 18: Please add Hazardous Materials Clean-up Contractor and Alternate Emergency Coordinator Cell Numbers respectively.

25. Attachment 6, Fire Protection and Emergency Action Plan, Page 18: Facility has listed contact numbers for the police and EMTs. In addition to this, please provide non-emergency telephone numbers of the closest fire and police station, as well as, the nearest hospital. Facility may list both and instruct their people to call the 911 number in emergencies, but both numbers need to be there. Your outside cleanup contractor information must also be included here. Please review and revise as appropriate.
26. Attachment 7, Unit Management, Page 7-1, Second Paragraph, Last Sentence: The tank closure letter is missing at the end of this attachment. Please review and provide the closure report letter for tanks T-83, and T-150.
27. Attachment 7, Unit Management, Page 7-4, Table 1, Summary of Aboveground Storage Tanks: Please include PCW tanks to the tank table.
28. Attachment 8, Closure Plan, Page 8-1, Second Paragraph, Second Sentence: The closure plan should also include detailed closure schedule. Please review and revise as appropriate.
29. Attachment 8, Closure Plan, Page 8-2, Closure of Tank Storage, First Paragraph, and Second Paragraph: These two paragraphs seem to contradict each other with regards TCLP testing of waste streams. All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.
30. Attachment 8, Closure Plan, Closure of Tank Farm Containment, Page 8-3: Please describe the decontamination process and how a completion determination is made.
31. Attachment 9, Employee Training, Page 9-1: The employee training program does not include USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. FCC Environmental, LLC 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 FCC Environmental, LLC may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.
32. Attachment 9, Employee Training, Page 9-1: This paragraph needs to be expanded. Also state that writer training records including name of the employee, date and type of training will be kept at the site.
33. Tank Inspection: Tank SKE and Tank SKW were installed in Year 1970. The facility provided documentation for Tank SKE's last detailed inspection. The tank inspection is missing for tank SKW. Please provide the tank inspection report and certification for this tank to the Department.



34. Facility should update the site map in accordance with the comments addressed in this NOD and re-submit in an electronic format (pdf preferred) so that this map can be inserted into the permit.
35. Facility should revise the used oil tank table in accordance with the comments in this NOD and re-submit in an electronic format (pdf preferred) so that this tank table can be inserted into the permit.