



# Florida Department of Environmental Protection

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Transmitted via email only to [gene.ceiply@eqonline.com](mailto:gene.ceiply@eqonline.com)

Gene Cieply, General Manager  
EQ Florida, Inc.  
7202 East 8<sup>th</sup> Avenue  
Tampa, Florida 33619

August 29, 2013

**Re: EQ Florida, Inc. Waste Processing Facility, Hillsborough County  
Pending Permit No. 34757-010-SO/30  
WACS No.: SWD/29/44633**

Dear Mr. Cieply:

This is to acknowledge receipt of the permit renewal application prepared by KCI Technologies, Inc., dated July 29, 2013 (received July 31, 2013), for construction and operation at an existing waste processing facility.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. This is the Department's 1st request for additional information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

**GENERAL:**

1. The requested information and comments below do not repeat the information submitted by the applicant. However, every effort has been made to concisely refer to the section, page, drawing detail number, etc. where the information has been presented in the original submittal.
2. Please submit **1 paper copy and 1 electronic copy** of all requested information. Please specify if revised information is intended to supplement, or replace, previously submitted information. Please submit all revised plans and reports as a complete package. For revisions to the narrative reports, deletions may be ~~struckthrough~~ (struckthrough) and additions may be underlined (underlined) or similar notation method. This format will expedite the review process. Please include revision date on all revised pages. Please also provide 1 electronic copy of the entire application package that incorporates the supplemental and replacement information submitted. This will ensure that an accurate record copy of the final approved permit application package is on file with the Department in one electronic file location.
3. Please provide a summary of all revisions to drawings, and indicate the revision on each of the applicable plan sheets. Please use a consistent numbering system for drawings. If new sheets must be added to the original plan set, please use the same numbering system with a prefix or suffix to indicate the sheet was an addition, e.g. Sheet 1A, 1B, P1-A, etc.
4. Please be advised that although some comments do not explicitly request additional information, the intent of all comments shall be to request revised calculations, narrative, technical specifications, QA documentation, plan sheets, clarification to the item, and/or other information as appropriate.

The following information is needed in support of the solid waste application [Chapter 62-701, Florida Administrative Code (F.A.C.)]. Please provide:

1. Where the information or documents submitted with this application is identical to information submitted with pending Hazardous Waste Permit Application #34875-HO-010, please revise the information provided with this application to be consistent with revisions made in response to Department's comments regarding the pending hazardous waste permit application.

**ENGINEERING REPORT (RULE 62-701.320(7)(d), F.A.C.)**

2. **Table of Contents:** Section 5.3 of the Engineering Report indicates that shredder as-built documentation is in Appendix M. Appendix A indicates that Appendix L is the Notice of Application. Please verify and revised the table of contents and/or appendices, as appropriate.

3. **Section 2.0:** According to the description of SWMU #12 in Section 10.2 of pending Hazardous Waste Permit Application #34875-HO-010, the oil/water separator tank is intended to replace the Used Oil Facility currently located in Concrete Container Storage Area. Please verify whether construction and operation of the proposed oil/water separator tank is permitted under the facility's used oil transfer facility permit. Please revise an appropriate section of this application to provide a specific description of the design and operation of the oil/water separator tank, consistent with that provided in Section 15.2 of the pending hazardous waste permit.

4. **Section 3.0:** Please revise this section to identify which figures present the current and proposed layouts of the facility.

5. **Section 4.1:** Please verify whether the referenced hazardous waste permit number is the current or pending permit number and revise this section as appropriate.

6. **Section 5.2.3:** Please revise this or another appropriate section of the Engineering Report and/or Operation Plan to specifically describe the procedures for separation of solid waste storage and processing from hazardous waste storage and activities in the Waste Processing Building.

7. **Section 5.2.4:** Construction and operation of the previously permitted Segregation Area has been eliminated from this application. Please revise this section and/or the facility Operation Plan to specifically describe where waste separation occurs at the facility and waste separation procedures.

8. **Section 5.2.6 - Solidification/Stabilization:** The schedule for notification to the Department prior to the use of alternative solidification agents to be included in the permit will be that provided by the applicant. Please revise this section and/or the Operation Plan to identify this schedule.

9. **Section 5.2.7:** Please verify and revise this section to clarify that the storage of roll-offs of solidified solid waste processed in the Solid Waste ESU is limited to the Solid Waste Operation Area and whether this area will be limited to the storage of roll-offs of solidified solid waste processed in the Solid Waste ESU. If roll-offs of treated/solidified waste from the HW ESU will be stored in this area, please revise Section 6.1.5 to describe this and the separation/identification of roll-offs from the different ESUs. Please also revise Figure 10, as appropriate.

10. **Section 5.3:** Please provide construction-level drawings of the new solid waste ESU similar to those provided for the new hazardous waste treatment & solidification unit as part pending Hazardous Waste Permit Application #34875-HO-010.

11. **Section 6.2.4:**

a. Pending Hazardous Waste Permit Application #34875-HO-010 identifies the southern part of the Waste Processing Building as being designated for temporary storage of HW containers to be treated or solidified and reagent storage. Therefore please explain how the current capacity of the facility (actually 185,650 gallons) remains unchanged and revise this and other sections of the application referencing and utilizing this capacity (e.g. Appendices B and E), as appropriate.

b. Spillage/leaks from hazardous waste treatment operation shall not be placed in the non-hazardous ESU, as described in this section. Please revise this and/or other appropriate sections of the Engineering Report and/or Operations Plan to specifically describe how spillage/leaks from solid waste processing operations will be identified and kept separate from spillage/leaks from hazardous waste processing operations in the Waste Processing Building.

c. Please revise this section to identify the capacity of the new non-hazardous waste ESU.

12. **Section 7.2:** Stormwater that contacts the hazardous waste processing area shall not be placed in the non-hazardous waste ESU as described in this section without supporting testing to determine that the contact stormwater is non-hazardous and non-reactive with solid waste processed in the unit. Please revise this section, as appropriate.

13. **Section 10.0 & Appendix F:** Rule 62-701.630, F.A.C., amended August 12, 2012, no longer requires proof of financial assurance as a condition of the issuance of this permit, but instead states that the facility cannot operate without proof of adequate financial assurance. Therefore the pending information to be included in Appendix F and the appendix itself is no longer needed as part of the application. Please revise this section and eliminate Appendix F, as appropriate.

14. **Section 12.1 & Appendix I:** Please update Appendix I to be limited to proof of property ownership information.

15. **Section 13.0 - Notification (Rule 62-701.320(8), F.A.C.):** This permit application includes relocation and construction of the non-hazardous waste ESU as well as operation changes in the Waste Processing Building to incorporate hazardous waste treatment/solidification and storage activities. Therefore publication of the notice of application is appropriate. Please publish the attached Notice of Application and provide proof of publication to the Department in the designated appendix.

16. **Figure 2:** Please explain the offset of the blue outlines on this figure and revise the figure, if appropriate.

17. **Figure 5:** Figure 5 is identified in the Engineering Report and other parts of this application as representing the facility layout. Therefore the figure should show the proposed layout of the facility, based on site changes proposed in both this application and pending Hazardous Waste Permit Application #34875-HO-010. Please revise this figure accordingly. Figures 6, 11 and 12 of the Engineering Report and appropriate site figures in the Contingency Plan should also be updated accordingly.

18. **Figure 6:** Please revise this figure to identify and distinguish between the solid waste processing area and hazardous waste processing area within the Waste Processing Building.

19. **Figure 9A:** Please verify that the height of "Raised Concrete Dock Area" to the new solid waste ESU is 24 inches and revise the dimensions shown on the sheet accordingly.

20. **Appendix A - Regulatory Cross-Reference:**

a. Please revise the cross-reference for the contingency plan to also reference Rule 62-701.320(16), F.A.C.

b. Rule 62-701.710, F.A.C. was significantly revised, effective August 12, 2012. Please revise this part of Appendix A, where applicable.

21. **Appendix C - Operation Plan:**

a. OPS-OP-030-FLA: This SOP, dated 12/5/07 (no revision date) appear to be a modification of the currently permitted SOP, which is dated 12/5/07 with a revision date of 2/10/12. Please verify that SOP submitted with this application is a revision of the current SOP and not an earlier version of the SOP, and revise the SOP, as appropriate.

22. **Appendix D - Contingency Plan:**

a. As discussed in several of the comments below, the contingency plan appears to have been significantly modified (from the currently permitted solid waste processing facility contingency plan) and focuses on hazardous waste operation at the facility. Please verify and either modify this contingency plan to also reference and discuss contingencies associated with solid waste operations at the facility or provide a separate solid waste management facility contingency plan prepared in accordance with Rule 62-701.320(16), F.A.C.

b. General Information/Introduction: A discussion of the facility at 7202 E. 8<sup>th</sup> Avenue appears to have been removed from this section of the plan. Please explain and revise the plan, as appropriate.

c. Implementation: Please revise this section, as appropriate, to discuss implementation of the plan related to solid waste operations at the facility.

d. Amendments of Contingency Plan: Please revise this section, as appropriate, to discuss amendment of the plan related to changes in to solid waste operations at the facility.

e. Coordination Agreements: The phone number for the DEP Southwest District Office has changed to (813) 470-5700. Please revise this and other sections of the plan, where applicable.

f. Emergency Equipment & Communication Systems: This section appears to be focused on the Waste Management Building. Please revise, as appropriate, to also discuss equipment and communication in the Waste Processing Building and Solid Waste Operations Area.

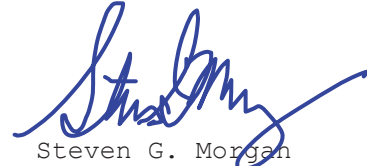
- g. Evacuation Plan:
- 1) This section and the Employee Response section of the plan indicate that air horns and an intercom system are throughout the facility while the Emergency Equipment & Communications System section only identifies them in the Waste Management Building. Please verify and revise if appropriate.
  - 2) This section and the Employee Response section of the plan indicate that pull alarms are throughout the facility while the Operation Plan indicates that Waste Processing Building has portable fire extinguishers. Please verify and revise if appropriate.
- h. Identification of Hazardous Materials Locations:
- a. A discussion of Waste Processing Building and Solid Waste Operations Area appears to have been removed from this section of the plan. Please explain and revise the plan, as appropriate.
  - b. Reference to "Non-Hazardous Waste" in Bay 3 appears to have been removed from this section of the plan. Please explain and revise the plan, if appropriate.
- i. Spill or Release Response Procedures: Please revise this section, as appropriate, to include procedures for solid waste spills and releases at the facility.
- j. Post Emergency Documentation - Reporting: Reporting shall be submitted electronically to the Southwest District Compliance Assurance Program at [SWD\\_Waste@dep.state.fl.us](mailto:SWD_Waste@dep.state.fl.us). Please revise this section accordingly.
23. **Appendix E - Solid Waste Closure Plan Details:**
- a. Closure Plan Cost Summary: Please provide copies of the supporting third-party quotes utilized for all the unit costs presented in the calculations in this table and revise the table, as appropriate.
24. **Appendix J - Documentation of Site Compliance with 62-701.300, F.A.C.:**
- a. Rule 62-701.300, F.A.C. was significantly revised, effective January 6, 2010 and to a lesser extent, effective August 12, 2012. Please revise Appendix J, where applicable.
  - b. Potable Water Wells: The supporting information provided at the end of the appendix appears to be the same information submitted with the facility's permit application in 2008. Please verify whether this information is still valid and revise this section to discuss how the information was verified (e.g. re-review of databases and field verification, as appropriate). Please provide update information, where applicable.
25. **Appendix L - Shredder As-Built Documentation:** Please revise the designated appendix (see Comment #1 above) to include the as-built documentation submitted to the Department on June 13, 2013.

Some of the comments and/or information requested by the Department above may have been either difficult to describe in writing or are better explained and discussed in person. In order to assist the applicant in completion of the application, the Department feels it would very beneficial to meet to discuss options for addressing these issues. The Department therefore requests that the applicant contact us to schedule a meeting or teleconference to discuss the comments in this letter prior to submittal of its response.

Please respond by **the date established in the meeting requested above**, responding to all of the information requests and indicating when a response to any unanswered questions will be submitted. If the response will require longer than the above schedule, you should develop an alternate timetable for the submission of the requested information for Department review and consideration. If the Department does not receive a timely, complete response to this request for information, the Department may issue a final order denying your application. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant may reapply as soon as the requested information is available.

Please contact me to set up a meeting or teleconference to discuss this letter and subsequent submittals at (813) 470-5754 or [steve.morgan@dep.state.fl.us](mailto:steve.morgan@dep.state.fl.us)

Sincerely,



Steven G. Morgan  
Solid Waste Section  
Southwest District

SM/sgm

Attachment

ec: Stuart Stapleton, EQ Florida, Inc., [stuart.stapleton@egonline.com](mailto:stuart.stapleton@egonline.com)  
Christopher Poole, KCI Technologies Inc., [christopher.poole@kci.com](mailto:christopher.poole@kci.com)  
Ron Cope, HCEPC  
Merlin Russell, FDEP Tallahassee HW Permitting  
Bheem Kothur, FDEP Tallahassee Used Oil Permitting  
Tor Bejnar, FDEP, Tallahassee Financial Assurance Section  
Susan Pelz, P.E., CAP Program FDEP Tampa  
Beth Knauss, CAP Program, FDEP Tampa  
Jeff Greenwell, P.E., Environmental Services Section, FDEP Tampa

62-110.106(5). Notices: General Requirements.

Each person who files an application for a Department permit or other notice as may publish or be required to publish a notice of application or other notice as set forth below in this section. Except as specifically provided otherwise in this paragraph, each person publishing such a notice under this section shall do so at his own expense in the legal advertisements section a newspaper of general circulation (i.e., one that meets the requirements of sections 50.011 and 50.031 of the Florida Statutes) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of the publication to the Department within seven days of the publication.

62-110.106(6). If required, the notice shall be published by the applicant one time only within fourteen days after a complete application is filed and shall contain the name of the applicant, a brief description of the project and its location, the location of the application file, and the times when it is available for public inspection. The notice shall be prepared by the Department and shall comply with the following format:

**State of Florida  
Department of Environmental Protection  
Notice of Application**

The Department announces receipt of an application for solid waste permit from the EQ Florida, Inc. for renewal and modification of an existing solid waste processing facility permit, subject to Department rules, at the EQ Florida, Inc. Waste Processing Facility located at 7202 E. 8<sup>th</sup> Avenue, Tampa, Hillsborough County, Florida.

This application is being processed and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, Southwest District Office, 13051 Telecom Parkway, Temple Terrace, Florida 33637-0926