



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

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SOUTHWEST FLORIDA
TAMPA PERMIT

4WD-RCRA

Dr. Richard D. Garrity
Director of District Management
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

SUBJ: Final Hazardous and Solid Waste Amendments Permit
~~City Environmental Services, Inc. of Florida~~
EPA I.D. No. FLD 981 932 494

Dear Dr. Garrity:

Enclosed is a copy of the final Hazardous and Solid Waste Amendments permit addressing solid waste management units for the City Environmental Services, Inc. facility located in Tampa, Florida.

If you have any questions regarding the enclosed permit, please contact Ms. Kimberly C. Clifton, of my staff, at (404) 562-8477.

Sincerely,

Narindar M. Kumar, Chief
RCRA Programs Branch
Waste Management Division

Enclosure

HSWA Permit in Folder 3-d



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-RCRA

SEP 29 1995

RECEIVED
OCT 02 1995

Mr. John Taylor
Universal Waste & Transit
9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453

United States Environmental Protection Agency
SOUTHWEST DISTRICT

SUBJ: Preliminary Draft HSWA Permit
Universal Waste & Transit, Inc.
EPA I.D. No. FLD 981 932 494

Dear Mr. Taylor:

This letter is in response to two comments that you submitted regarding the Preliminary Draft HSWA Permit for Universal Waste & Transit (UWT), which you recently reviewed. The following are your comments along with EPA's responses:

COMMENT #1: Please revise references from drum to container (Page 2 of 10).

EPA RESPONSE:

The RCRA Facility Assessment (RFA) Report, dated March 1995, identifies SWMU 1 as the "Drum Storage Area." Universal Waste was given an opportunity to comment on this report prior to finalization. Since the request to modify the name of this SWMU was not made before finalization of the RFA report, to revise the HSWA Permit at this time may be confusing to those unfamiliar with the facility. In order to maintain consistency between all documents related to this facility EPA feels it necessary not to revise this reference as requested.

COMMENT #2: Confirmatory Sampling (CS) is intended to "determine whether or not a release has occurred." CS of the Retention Pond (SWMU 3) should be sufficient to meet this criteria. CS of the Pre-Treatment Unit (SWMU 6) would not provide any significant additional information. Since this unit flows to the retention pond, CS of the unit and pond are essentially redundant. UWT requests that CS of the retention pond only be required.

EPA RESPONSE:

After considering UWT's above comment, EPA agrees that sampling both SWMUs would be redundant. Therefore, the HSWA Permit will be revised to include confirmatory sampling of SWMU 3 (Retention Pond) only and the requirement to sample SWMU 6 (Pre-treatment Unit) will be deleted.

If you have any further questions regarding this matter, please contact Ms. Kimberly C. Clifton, of my staff at (404) 347-3555 ext. 6320.

Sincerely,



G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

cc: Satish Kastury, FDEP, Tallahassee
Roger Evans, FDEP, SW District