



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

DATE: 3-30-98  
 TIME: 2:00 PM  
 SUBJECT: Florida Waste Environmental Services - Discussion of 1st N.O.D.

### ATTENDEES

<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Bill Crawford	FDEP - Used Oil Permitting	813-740-6100 x 372
Roger Evans	"	" x 388
Tom Brislin	FWES -	813-246-4211
FRAU BRAAKSMA	FW.E.S.	813-246-4711



## Florida Waste Environmental Service

March 12, 1998 March 30, 1998

Mr. William Crawford  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Re: Florida Waste Environmental Services, Inc.  
Used-Oil Processing Operating Application #76517-HO06-001  
Request for Extension

Dear Mr. Crawford:

Florida Waste Environmental Services, Inc (FWES) requests an extension in submitting responses to your *First Notice of Deficiency* dated February 13, 1998. FWES is not processing used-oil at this time but is still operating as a Used-Oil and Oil Filter Transporter and Transfer Facility.

Gary Santti, East Bay Engineering, will be the Engineer of Record for this Permit. Two copies of the responses will be submitted with page numbers and formatted revision block in a three-ring bound notebook with the revised date as requested.

Florida Waste Environmental Services was a Hazardous Waste Transporter but was reclassified on March 14, 1996 as a non-handler after moving into this new location on January 1, 1996. Florida Waste Environmental Services has been in business for 15 years. FWES correct Facility ID# is FLR000013888. See attached letter addressed to Ms. Sharon Summers. Ms. Sharon Summers is co-owner with Ms. Fran Braaksma. FWES intends to become a Hazardous Waste Transporter within the near future after obtaining required insurance FWES is not processing solid wastes at this time at this location.

A recent survey with topographic data indicating flood plain delineation "B" (100-500 year storm), and previous stormwater retention areas were submitted for the SWFWMD *Environmental Resource Permit (ERP) application # 4617654.00*. An ERP Permit is forthcoming.

FWES has obtained an *EPA NPDES Industrial Stormwater MultiSector 'P' Permit* (FLR05B570) and prepared a *Stormwater Pollution Prevention Plan* with Best Management Practices. All these and the US Coast Guard approved *Facility Response Plan* pursuant *40 CFR Section 112* have been approved by other regulatory agencies that includes spill response and preparedness. The US Coast Guard has jurisdiction for coastal facilities while EPA has inland facilities responsibility.

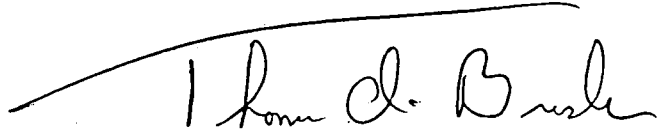
Mr. William Crawford  
Page Two of Two  
March 30, 1998

FWES is currently undergoing facility improvements and other permitting besides the Used-Oil Processing Permit and requires additional time for a quality response. Meanwhile FWES will continue operation as a Used-Oil Transporter and Processor. Thank you for this extension. We would like to schedule a meeting to discuss the permit contents prior to the next revision submittal.

Sincerely yours,



Fran Braaksma  
President



Thomas A. Brislin  
Environmental Engineer/Industrial Hygienist

- 4 1. PART II, Appl. FORM — EPA ID # incorrect
- Nº 2. PART II — TITLE OF FRANCES BRAAKSMA MISSING  
(each PART II is different?)
- ✓ 3. where is page 1?
- ✓ 4. I.D page 4 - They have not notified as a HW transporter
5. 1.1 page 4 para 2 - used oil is "treated"? how?  
OK, answer should be in Attachment 2.0
- ✓ 6. 1.1 page 4 para. 2 - "Another category of waste is fuels which are combustible, flammable, and Petroleum Contact water" What does this mean?
- ✓ 7. 1.1 page 4 para 3 — paragraph 1 does not say they will handle solid waste. They are not permitted to handle solid waste!
8. 1.1 page 4 para 4 - Health Department has nothing to do with oil/water separators at car washes and commercial institutions. Restaurant & oil/watersep.
9. Terminal Facility Registration for period 1/1/96 → 12/31/96 ?
- ✓ 10. 1.2 page 5 — FWES is not "licensed" Used Oil Transporter they are registered,

Attachment 2.0

11. 1.3.1 processing order wrong - solids would be removed before going into storage.
12. 1.3.1 - what kind of halogen screening method.
13. 1.3.1 - By-Products? How will they treat.
14. 1.3.2 - what?! My Goodness!
15. 1.3.4 - If it doesn't meet Pre-Burn Criteria, how can they dispose of it in landfill.
16. 1.3.5 - fuel filters are not oil filters
- ✓ 17. 1.3.6 - Non handler of hazardous waste, page 4 says HAZ waste transporter.
- ✗ 18. 1.3.6.2 - what does this mean, approved for what, by who.
- ✓ 19. 2.1.1 page 10 - "waste" oils, should be "used oils"
- ✗ 20. 2.1.1 - what is the chemical & physical means.
- Next analysis  
2.1.1 2.1.1 - should specify the testing.

- ✓ 22. 2.1.4 - Must explain this more, where is it going
- ✓ 23. Wastewater Treatment System - who is Dave.?
- ✓ 24. Portable Operations - what is this for?
- ✓ 25. Process System - not enough details.
- ✓ 26. Site Plan does not reflect structures currently on property.
27. Exhibit 2. Waste Hauler Discharge permit.  
a) JAN 1, 1998 - new permit application required where is it  
b) Where is the current permit.?
- ✓ 28. 3.0 page 12 - That is not the definition of used oil per 40CFR 279.
- ✓ 30. 3.1 page 12 - generators who mix mineral spirits, this is all wrong
- ✓ 31. 3.1 page 12 - used oil mixed with haz. waste. what is this mean.? CESQG can mix.

32.3.1 para 5 page 12 - All trucks "subject" to screening  
does that mean they will be screened sometime

✓ 33. ATTACHMENT I I don't think so.

34. 4.0 - TANK Farm sludge - analysis needs to  
be specific

35. 4.? what waste profile sheet will they use?  
why did they put them in attachment  
4.0.

✓ 36. 5.1 ~~waste~~ oil should be "used oil"

✓ 37. 5.1 pick-up "product"?

✓ 38. 5.3 How is antifreeze recycled?

39. 5.3 How is antifreeze segregated from used oil.

340. 5.0 Tracking is incomplete.

41. Prepare & Presentation

✓ a. page 1 this has not been done.

b. page 4 ?

✓ c. page 6 Date operation commenced incorrect  
oil processing hasn't started

41. continued

- ✓ d. page 6 EPA ID# wrong
- ✓ e. management certificate not signed
- f. page 8 ?
- ✓ g. page 9. 1.1 not oil processing
- h. page 10. What is this page for?
- i. page 11 figure 1 does not show what it says it shows. 6 for 8 tanks?
- j. page 11

I QUIT.

ITS A LIE!

- ✓ 42. 7.1 what about drum containing used oil + filters?
- ✓ 43. 7.1 Material Profile form - what's this? Are they not managing waste?
- 44. ✓ 7.1 what DOT shipping requirements. When must they?
- ✓ 45. 7.1 Why overpack something if it does not have a label.
- ✓ 46. 7.1 What part of 40 CFR?



- ✓ 47. 7.1 What are drum cells and secondary bins. Where are they?
48. 7.2 Specifics of tank farm must be included.  
 ✓ # of tanks  
 ✓ size of tanks
- ✓ 49. 7.2 What storm event?
- ✓ 50. Where are the wells in respect to GW flow.
51. Some tanks don't contain used oil, so why are they being labeled used oil.
52. <sup>whole plant</sup> Table 1 does not show dimension of tanks.
53. Tank farm shows 6 tanks, Table shows eight tanks
54. What 62-762 requirements will be met.
55. 7.3 ?

56. Diagram.  
 a) extra used oil storage tank outside farm?  
 b) wash treatment of what?  
 c) what water treatment  
 d) equalization? e) process system for what.

57. oil filter containers.