

Thursby, Kim

From: Gene Cieply <Gene.Cieply@usecology.com>
Sent: Tuesday, March 08, 2016 8:00 AM
To: Kruchell, Carrie L.; Stuart Stapleton
Cc: Thursby, Kim
Subject: RE: EQ Florida, Inc.; FLD 981 932 494; First Request for Additional Information (RAI)

Carrie,

We received the RAI attachment.

Thanks,

Gene

From: Kruchell, Carrie L. [mailto:Carrie.L.Kruchell@dep.state.fl.us]
Sent: Tuesday, March 08, 2016 7:53 AM
To: Stuart Stapleton <Stuart.Stapleton@usecology.com>
Cc: Gene Cieply <Gene.Cieply@usecology.com>; Thursby, Kim <Kim.Thursby@dep.state.fl.us>
Subject: FW: EQ Florida, Inc.; FLD 981 932 494; First Request for Additional Information (RAI)
Importance: High

Morning Stuart and Gene.

Could you please do us a favor and reply that you have received this letter to the 'epost' email address listed below, or directly to Kim Thursby, whose email address I've added above?

Thanks very much,

Carrie L. Kruchell, PG
Professional Geologist II

Florida Department of Environmental Protection
Hazardous Waste Program & Permitting, Rm 319-F
2600 Blair Stone Road, MS 4560
Tallahassee, FL 32399

850-245-8765

Carrie.L.Kruchell@dep.state.fl.us

Please note: Florida has a broad public records law. Most written communications to or from state employees are public records and may be made available to the public or media upon request. This email communication, and future emails to my attention may therefore be subject to public disclosure.

From: Thursby, Kim **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Tuesday, March 01, 2016 3:00 PM
To: 'gene.cieply@usecology.com' <gene.cieply@usecology.com>
Cc: Bahr, Tim <Tim.Bahr@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>; Honey, Kelly <Kelly.Honey@dep.state.fl.us>; 'Stuart.Stapleton@usecology.com' <Stuart.Stapleton@usecology.com>; Kruchell, Carrie

L. <Carrie.L.Kruchell@dep.state.fl.us>

Subject: EQ Florida, Inc.; FLD 981 932 494; First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting 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.

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.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting

The Florida Department of Environmental Protection is committed to providing efficient, consistent and quality service to the citizens of Florida. In keeping with these objectives, we are pleased to announce ongoing improvements to our permitting process by standardizing and simplifying our documents. Last fall, the Department began issuing permitting correspondence that is formatted consistently throughout all programs. Although you may receive documents that look slightly different from past correspondence, please be assured that the content continues to be driven by applicable Rules and Statutes. As always, if you have any questions, please contact your local Department office.





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

REQUEST FOR ADDITIONAL INFORMATION

March 1, 2016

Mr. Gene Cieply
EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619
gene.cieply@usecology.com

Re: First Request for Additional Information (RAI)
Hillsborough County – Hazardous Waste
Facility Name: EQ Florida, Inc.
Facility ID: FLD 981 932 494
DEP Application No.: 34875-HO-012

Dear Mr. Cieply:

Thank you for your application for an Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 34875-HO-012 to the application. A Department staff review of the application and supporting documentation submitted from December 18, 2015 through February 11, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, or by March 29, 2016, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

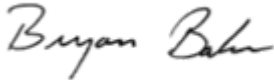
Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Carrie.L.Kruchell@dep.state.fl.us. If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/>. After posting the document,

Mr. Gene Cieply
Page 2 of 11
March 1, 2016

send an e-mail to HWPP@dep.state.fl.us, with a copy to Carrie.L.Kruchell@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Carrie Kruchell, P.G., by telephone at 850-245-8765 or by e-mail at Carrie.L.Kruchell@dep.state.fl.us.

Sincerely,



Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

CLK/BB

cc:

Brian Bastek, EPA Region 4 – Bastek.Brian@epa.gov
Beth Knauss, DEP Southwest District – Elizabeth.Knauss@dep.state.fl.us
Kelly Honey, DEP Southwest District – Kelly.Honey@dep.state.fl.us
Stuart Stapleton, EQ Florida, Inc. – Stuart.Stapleton@usecology.com

Attached: List of Requested Information

Attachment: List of Requested Information

Facility Name: EQ Florida, Inc. (EQFL)
Facility ID: FLD 981 932 494
DEP Application No.: 34875-HO-012

The Department appreciates the input of EQ Florida and the DEP Southwest District in the development of these comprehensive comments. The resulting permit modification should provide a permit that is an accurate description of EQFL's processes (from a regulatory perspective); a permit that is clear and easier to comply with.

1. Permit Modification Application Title Page.
 - a. Correct the facility address to 7202 East 8th Avenue.
 - b. The current permit number is: 34875-HO-011. Please revise.
 - c. As this submittal was the first application submitted, "Revision" number should be "00".
2. Permit Application Form, Part A.17-Please provide the license number for the professional engineer of record.
3. Permit Application Form, Part A.19-Existing or pending environmental permits. Please ensure that a list of all environmental permits currently existing or pending are added, e.g., "attached as a separate sheet", to the application.
4. Permit Application Form, Part D.2-The NAICS code listed appears incomplete. Please select one or more NAICS codes for listing. As suggested, 562211, 562111, 562219 and 562112 all appear to fit the range of services that EQFL provides. Also please revise form 8700-12FL accordingly.
5. Permit Application Form, Part D.3-Revise the Process Code table found in Appendix B, Volume 2 of 3 of the November 2013 application to include "process design capacity and units of measure". Annual quantities from 2015 should be used.
6. Table of Contents- We recommend compilation and insertion of a table of acronyms for names of buildings/storage areas, etc. that are used throughout the permit modification application. This will help EQFL as well as assist the permit application reviewer/writer and compliance inspectors in understanding the facility layout and operational areas.
7. Section 2.1 – Permit Modification Overview.
 - a. Revise this section to include all operational changes proposed by EQFL as discussed between December 18, 2015 and February 22, 2016. The most recently drafted changes including recommendations from the Department and SWD staff are inserted below for your convenience:

This application proposes the following modifications to the current Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendment (HSWA) Operating Permit, No. 34875/HO/011, finalized on April 1, 2014, including the:

1. Addition of 'listed' Waste Code K062, to the list of hazardous wastes codes (D002 and D004 through D011) that are currently permitted for treatment within the WPB. K062 is the waste code for 'spent pickle liquor' from steel finishing operations generated by facilities in SIC 331 and 332 Industry Groups - Steel works, blast furnaces, and rolling and finishing mills, as iron and steel foundries. EPA's Office of Solid Waste (OSW) defines "steel finishing operations" as processes which impart desired mechanical and surface characteristics to steel.
2. Deletion of the currently permitted 'staging' of 80 drums/4,400 gallons of waste codes D002, D004 through D011) and the replacement of a permitted storage area having a total capacity of 80 drums/4,400 gallons of hazardous waste (waste codes D002, D004 thru D011, and K062) storage in the Waste Processing Building (WPB) for up to 365 days. This proposed permitted chemical storage area in the WPB will include containers of 'characteristic' hazardous waste received by EQFL as solids, liquids, and sludges. These hazardous waste materials will be stored in the proposed designated storage area (**See Inset, Figure 7**) awaiting treatment by 'stabilization' in the hazardous waste treatment tank. This proposed additional capacity shall not be exceeded at any time. Once the hazardous waste chemicals have undergone treatment and solidification (as confirmed by a positive Paint Filter Test (PFT) result), additional hazardous waste chemicals may be unloaded into the permitted area to await treatment. Should the treatment batch within the tank result in a negative (failed) PFT, no additional drums or containers will be unloaded into the WPB until such time as the PFT has confirmed that only solids exist within the tank. At this point, the treated materials can be offloaded into roll-offs and counted against the 800 CY capacity of the Bulk Container Storage Areas (BCSAs). See Bullet 3 below. Modeling shall be undertaken for risk of offsite consequences as per Florida Statutes (F.S.) 403.7211 – *Hazardous Waste Facilities managing hazardous wastes generated offsite* (**Section 14**). The WPB is designated as Solid Waste Management Unit (SWMU) 7.
3. Addition of 800 cubic yards (CY), or a maximum of forty (40) 20-CY roll-off boxes, of post-treated (via stabilization) and solidified formerly 'characteristic and/or 'lime-stabilized K062' hazardous waste material storage within the footprint of the asphalt-covered parking lot located on the south side of E. 9th Avenue within the proposed Bulk Container Storage Areas (BCSAs) illustrated on **Figure 7**. The treated material will be placed in roll-offs and positioned inside of the four (proposed) designated and permitted BCSAs only after EQFL has confirmed that no free liquids exist within each given 'batch' of material being treated within the hazardous waste treatment tank by administering one (1) 'paint filter test' per batch (See Method 9095a, Appendix J, Volume 2 of 3, and the Waste Analysis Plan (WAP), Section XX). Sampling protocols for paint filter tests and subsequent 'toxicity characteristic leaching procedure' (TCLP) analyses are provided in the WAP in Section X. The proposed storage area meets the 40 CFR 264.175(c) containment system requirements for the storage of containers holding wastes that do not contain free liquids. As a further safeguard, a "cracks and gaps identification and repair program" (SOP QES-OP-006-FLA, Appendix J, Volume 2 of 3) will ensure that the asphalt parking lot surface remains sufficiently impervious. In addition, the parking lot is sloped in a manner that drains precipitation away from the storage area and stored bulk containers; the bottom of the bulk containers are elevated 6 -8 inches above the ground which protects the bottom of the container from contact with accumulated liquids. The 20-CY roll-off boxes are designed for hazardous

waste transportation and are DOT-approved. All proposed storage within the BCSAs shall be managed, permitted and financially assured as hazardous waste until receipt of laboratory analytical confirmation declares the waste as ‘non-hazardous and no longer characteristic’. In addition, non-hazardous waste may be stored within the BCSAs (provided the 800 CY maximum capacity is not exceeded) and will not be counted toward the facility’s daily hazardous waste capacity provided that proper labeling procedures have been undertaken (Section X). The BCSAs are designated as SWMUs 20a through 20d, as illustrated on **Figure 17**.

4. Deletion of the currently permitted (April 1, 2014) but not yet installed 6,000-gallon oil-water separator (SWMU 19) which was to be constructed outside and along the northeast corner of the WPB. EQFL requests the deletion of this unit from the permit due to changes in market conditions since April 2014, and no longer intends to construct an oil-water separator.
5. Clarification regarding the operations within the 10-day Transfer Facility. Explanations within Paragraphs 15, 18 and 19 of the current permit pages 19 & 20 of 47 remain unclear.
6. Clarification that the permitted hazardous waste capacity for the Inbound/Outbound (I/O) Staging Area co-located on the E. 8th Avenue property within the footprint of the 10-day Transfer Area (SWMU 11) is included as part of the total allowable 50,000 gallons as permitted for storage in the CSB and ISCA. Explanations within the current permit, Paragraphs 15, 18 and 19, pages 19 & 20 of 47 remain unclear.

- b. Revise this section to include a table outlining all existing and proposed hazardous waste capacities. A copy of the draft table is provided below:

TOTAL EXISTING & PROPOSED HAZARDOUS WASTE STORAGE CAPACITIES

Building/Storage Area	Existing or Proposed	Location at Facility	SWMU	Capacity
Container Storage Building, Improved Secondary Containment Area and Inbound/Outbound Staging Area	Existing	2002 N. Orient Road, North of E. 9 th Avenue & 7202 E. 8 th Avenue, Parking Lot, West of Office Building	1, 2, 8, 11	50,000 gallons
Waste Processing Building	Proposed ¹	7202 E. 8 th Avenue, West of Office Building	7	4,400 gallons
10-day Transfer Area	Existing	7202 E. 8 th Avenue, Parking Lot, West of Office Building	11	20,000 gallons or 100 CY
Bulk Container Storage Areas	Proposed	Parking Lot, South of E. 9 th Avenue, North and West of Office Building	20a-20d	800 CY
Total Existing & Proposed Hazardous Waste Storage Capacity:				74,400 gallons + 800 CY

NOTES:

1 – The proposed permitted storage area replaces the currently allowed ‘staging’ of a maximum of 80 drums/4,400 gallons. If permitted, the WPB will have a total hazardous waste storage capacity of 4,400 gallons.

8. Section 2.3 – Facility Layout and Operations. Revise this section to fully describe each of the buildings and/or storage areas across the facility, their construction, physical locations, the operations conducted within, and the existing/proposed total hazardous

waste storage capacity within each.

9. Section 2.4.1 – Waste Received – CSB. Revise/update the waste type categories that are currently handled at the facility.
10. Section 2.4.5 – Treatment of Characteristic (and Listed K062) Hazardous Wastes. Insert an explanation of how characteristic and ‘listed’ wastes will be treated and also reference the section within the WAP.
11. Section 2.4.7 – Reactives Magazine. Provide an explanation as to why an ATF Permit is not required.
12. Section 3.5 – Hazardous Debris. It is the Department’s understanding from recent discussions with EQFL, that EQFL will no longer treat hazardous debris. If EQFL intend to continue to receive/manage hazardous debris, please revise this section as appropriate, and if not, please delete. A clarification regarding hazardous debris should be added to Section 2.1 – Permit Modification Overview.
13. Section 4.0 – Waste Analysis Plan. Review this section in its entirety and ensure that the revised WAP is in accordance with the “Waste Analysis at Facilities that Generate, Treat, Store and Dispose of Hazardous Waste – Final”, issued July 2015, EPA 530-R-12-001. Emphasis should be placed on the identification of which specific treatment methods will be utilized for specific waste codes, succinct explanations of the treatment process(es) and sampling protocols and analytical methods (and lab data turnaround times) utilized for each. EQFL should be able to describe the new ‘stabilization’ treatment method which became permitted a year ago, and be able to include detailed pass/fail rates per treatment batch per treatment method. Specifically, more details are required for the proposed ‘lime-stabilization’ treatment of waste code K062 and for the waste codes D002, and D004 through D011 (See Comments 8.2 and 8.3 above).
14. Section 5.2 – Inspection Plan, Schedule. Include actual daily operating schedule for EQFL, e.g., Mon-Sat.
15. Section 5.4 – Inspection Logs. Make appropriate revisions in keeping with existing/proposed storage capacities for the 10-day Transfer Area, the Inbound/Outbound (I/O) Staging Area, the CSB, the Improved Secondary Containment Area (ISCA), the WPB and the BCSAs. Ensure that the forms are formatted large enough to read and fill out in the field.
16. Section 7.0 – Manifest System, Recordkeeping and Reporting. Review and revise as necessary and in keeping with comments from the SWD after a recent facility-wide compliance inspection.
17. Section 8.0 – Solid Waste Management Units.
 - a. Update the history within this section to include SWMUs 1 through 19, and list the proposed SWMUs 20a through 20d (BCSAs).

- b. Correct SWMU 11. The BCSAs are now called SWMU 20a through 20d.
 - c. Provide more details on SWMU 12, Used Oil Facility. As SWMU 19 will not be installed/constructed, it is the Department's understanding that SWMU 12 will remain active. Please confirm.
18. Section 9.0 – Closure Plan. Once the revisions to the Closure Plan and associated costs have been received, the Department will perform a detailed review for financial assurance purposes.
 19. Section 9.4 – Maximum Waste Inventory. Correct the “Other Hazardous Waste (Bulk Container) volume to 800 CY total and remove the 400 CY “Non-RCRA Waste (Bulk Container) amount. For the purposes of deriving Closure costs, all roll-offs stored within the BCSAs are considered to be hazardous waste. Ensure that the maximum volume of hazardous waste specified for the WPB is changed from 5,000 gallons to 4,400 gallons, as per our recent discussion on February 29, 2016.
 20. Section 9.6 – Decontamination. “Transportation” Costs table. These costs appear to comprise transportation costs and not decontamination costs -- please confirm and revise if necessary. Also, correct the “Other Hazardous Waste (Bulk Container) volume to 800 CY total and remove the 400 CY “Non-RCRA Waste (Bulk Container) amount. For the purposes of deriving Closure costs, all roll-offs stored within the BCSAs are considered to be hazardous waste. Ensure that the maximum volume of hazardous waste specified for transportation for the WPB is calculated based upon the 4,400 gallons, as per our recent discussion on February 29, 2016.
 21. Section 9.8 – Closure Cost Estimate (10-Day Transfer Facility). “10-Day Transfer Facility Closure Cost” table. The “Disposal Volumes” listed add up to 20,020 gallons assuming 55-gallons per drum; however the maximum capacity for this area is only 20,000 gallons (or 100 CY). Please correct or explain.
 22. Section 9.9 – Closure Cost Estimate (Waste Processing Building). The “Disposal Volumes” listed in the table add up to 5,005 gallons assuming 55-gallons per drum; however the proposed maximum capacity for this area is only 4,400 gallons. Please correct. The verbiage in Paragraph 1 should read “removal of 4,400 gallons of hazardous waste”.
 23. Section 9.10 -- Closure Cost Estimate (Bulk Container Storage Areas). Correct the “Other Hazardous Waste (Bulk Container) to 800 CY total and remove the 400 CY “Non-RCRA Waste (Bulk Container) amount. For the purposes of deriving Closure costs, all roll-offs stored within the BCSAs are considered to be hazardous waste.
 24. Section 9.11 – Closure Cost Estimate (Combined Operations). Revise the combined costs table accordingly.
 25. Section 9.12 – Financial Assurance. Revise in keeping with revisions requested throughout Section 9.

26. Sections 10 and 11 – Revise and update as discussed during teleconferences held through February 22, 2016.
27. Section 12 – On-Ground Treatment Tank System.
 - a. Make necessary revisions since this tank has now been constructed and operating for at least one year.
 - b. Ensure that the methods for treatment are in accordance with future revisions made to the WAP.
 - c. Remove the section related to ‘Alternate Treatment Standards for Soils and Contaminated Debris’.
 - d. Table 12.1 should be revised to include Waste Code K062 (proposed for treatment).
28. Section 13 – Facility Air Emissions Requirements.
 - a. Revise the history related to the current permit.
 - b. Reference should be made to Section 14 when discussing the requirements under this modification for “Offsite Consequence Analysis” (OCA).
 - c. Spell out ‘ppmw’ in the first instance it is used within the Section.
 - d. Within the “Conclusions” (Section 13.5), ensure that discussion is presented for the proposed treatment of listed waste code K062 via ‘lime-stabilization’.
 - e. Include the Hazardous Waste Treatment as a Primary Activity in table 13.1. Note that all tables within the application text should be in landscape format within the document or be positioned horizontally across the ‘portrait’ styled page for readability.
29. Section 14 – Exposure Information. This section will be revised in its entirety and will be replaced with the Offsite Consequence Analysis (OCA) methodology and results once undertaken and received by EQFL.
30. Figures-Revise the following figures submitted on February 11, 2016 as per our discussions and as summarized below:
 - a. Figure 6 – Boundary Survey.
 - i. Remove the wording “Roll-Off Storage & Staging Area” from the 8th Avenue property parking lot area on this and all figures.
 - ii. Confirm that the correct name of the streets are “East 8th Avenue” and “East 9th Avenue”, and correct all figures accordingly.
 - iii. Explain the reference to “72nd Street/62nd Street (P)” along the western property boundary along the Orient Road portion of the facility; if not necessary, remove from all figures.
 - b. Figure 7 – Existing Facility Layout.
 - i. Change figure title to “Existing *and Proposed* Facility Layout” since some of the features shown are proposed but have not been permitted yet.
 - ii. Within each of the proposed container storage areas, include to-scale containers exemplifying the maximum amount of proposed hazardous waste. For example, it is proposed that the four (4) Bulk Container Storage

- Areas (BCSAs) are to contain a maximum of 40, 20-cubic yard (CY) roll-offs; and the proposed permitted Hazardous Waste Storage area within the Waste Processing Building (WPB), Inset 2, is intended to store a maximum of 80, 55-gallon drums. Also ensure that the 2-feet of aisle space is included in the measured areas.
- iii. Ensure that the footprints of the BCSAs and the Hazardous Waste Storage area are on the base map for figures 9, 10, 11 and 13.
 - iv. Correct the title “10-Day Inbound/Outbound Staging” to: “10-day Transfer Area” and “Inbound/Outbound Staging Area”, as these are two distinct operations.
 - v. Change the wording from “Drum Storage” in the upper northeast corner of the WPB to “Non-Haz Drum Storage”.
 - vi. On the fold-out flap, under “Sheet Title”, change the name from “Existing Facility Flow” to “Existing and Proposed Facility Layout”.
- c. Figure 9 – Traffic Flow.
- i. Once the footprints for the proposed BCSAs have been added, re-draw the traffic flow arrows as appropriate.
 - ii. Include a color-coded key and indicate which types of vehicles are traveling in both directions and whether they are empty or loaded.
- d. Figure 10 – Site Security. No changes except as previously noted.
- e. Figure 11 – Emergency Preparedness Plan. Please change either the red or the orange-colored arrows to a different color so that the contrast is apparent.
- f. Figure 13 – Drainage & Stormwater Controls.
- i. Beneath the “Flow Schematic” in the upper left-hand corner of this figure, add “See Figure 14”.
 - ii. Legend: At the very bottom under “Site Statistics”, change “Proposed Use” to “Use”, and change the wording next to it to read: “Continued use as a solid *and hazardous* waste processing facility”.
- g. Figure 14 – Container Storage Building & Covered Processing Area Layout.
- i. Add the words “Retention Pond” to the oval-shaped retention pond to the right of the Container Storage Building (CSB).
 - ii. Use a different font size or type for the background lettering as it is unreadable.
 - iii. Add a notation/symbol for the location of SWMU 18, Drum Crushing area.
 - iv. Either add an explanation within the Legend, or remove the encircled A, B + C within the Covered Processing Area and Improved Secondary Containment Area (ISCA). There is nothing in the key or in the permit application verbiage that refers to these letters.
 - v. Ensure that the waste storage within the CSB (Bays 1, 2 and 3) is illustrated on Figure 14 as organized by hazard class and compatibility. Note that the Summary of Characteristic and Listed Hazardous Wastes table, Appendix B of Volume 2 of 3 of the application refers to this figure.
 - vi. In the Legend, the wording next to the symbol for “Approximate Stormwater Flow” has the wrong figure referenced. Change the reference to state “Figure 13”.

- h. Figure 15 – Waste Processing Building Layout. Change the names of the Haz and Non-Haz Treatment “Units” to “Tanks”.
 - i. Figure 16 – Waste Management Area Locations. As previously noted, use the correct names for the processing and/or storage areas (ISCA, BCSA, etc.). The wrong amount of roll-offs is provided on this figure – 42 instead of 40, the maximum proposed amount.
 - j. Figure 17 – Solid Waste Management Units.
 - i. Legend, #11 – Correct title to include “Inbound/Outbound” before “Staging Area”.
 - ii. Legend, #12 – Change the description. This SWMU is still existing.
 - iii. Legend, #18 – Add “/Rag Compacting” after “Drum Crushing”.
 - iv. Legend, #19 – Remove “Proposed” and add “Never Installed”, or similar wording.
 - v. Legend, #20 – Add “(20a through 20d)”.
 - vi. Figure: (4) SWMU 20 Locations: Label each rectangle with ‘20a’ through ‘20d’, beginning with the northernmost storage area as ‘SWMU 20a’.
31. Construction and Operation Permit Application, Volume 2 of 3 (November 2013). Make the following updates/revisions to the Appendices as discussed and agreed upon during the teleconference held on February 22, 2016:
- a. Appendix B: Summary of Permitted EPA Hazardous Waste Codes.
 - i. Revise the summary table to include actual Annual Quantities, as opposed to “Estimated”, and based upon the actual volume of wastes processed during 2015.
 - ii. It is noted that T21 (chemical fixation) treatment code is listed and refers to the stabilization/solidification (S/S) of characteristic wastes. Does the treatment code vary for the K062 wastes?
 - iii. Revise “Bay Capacities” to also include the allowable permitted capacity of the ISCA (10,000 gallons, provided the maximum of 50,000 gallons is not exceeded at any time. Also list the I/O capacity of 10,000 gallons, provided the maximum of 50,000 gallons is not exceeded at any time. Ensure that the footnote referencing Figure 14 (waste storage within the CSB is illustrated by hazard class and compatibility) is correct.
 - b. Appendix C. EQFL Permit List Summary. Review and revise as necessary with information related to all existing and/or pending environmental, solid waste and hazardous waste permits.
 - c. Appendix D. Facility and Hazardous Waste Management Building As-Built Drawings. All revised figures that form part of this modification application should be submitted as originals, signed and sealed by the Professional Engineer of record for this application.
 - d. Appendix E. SWFWMD Well Inventory. Update this table (and accompanying map as required) to ensure that no new wells have been installed in the vicinity of the site since 2013.
 - e. Appendix F. Financial Assurance & Insurance Documentation. Ensure that this information is provided within the time allotted after this application has been

deemed complete.

- f. Appendix G. Solid Waste Management Units.
 - i. Update the “Solid Waste Management Unit (SWMU) Identification Summary” table.
 - ii. Provide new photos for the following SWMUs:
 - 1. SWMU 7. Need an indoor photograph showing the two different treatment tanks, the drum storage areas and the reactives magazine.
 - 2. SWMU 12. Update the photograph and provide more of an explanation of what happens to the used oil once it is recontainerized.
 - 3. SWMU 19. While this SWMU will never be constructed, take a photograph of the intended area with the recommendation of “No Further Action – Never Installed” in the description section of the Data Sheet.
 - 4. SWMU 20. Need shots of the four BCSAs: 20a through 20d.
- g. Appendix J. Waste Analysis Plan Documentation & EQFL SOPs. Add all new and revised facility SOPs and WAP guidance documents that will be used in support of the proposed hazardous waste storage as part of this permit modification application. Ensure that all hazardous waste treatment SOPs and guidance documents pertaining to the various ‘stabilization’ methods have been added as well.
- h. Appendix K. Inbound Waste Shipment Records & Waste Characterization Reports. Update all tables with actual 2015 volumes. The existing tables have been compiled using data from calendar year 2012.
- i. Appendix L. Proof of Publication Notice. Pursuant to 62-730.292(6), F.A.C., proof of publication and broadcast required under this permit application will be provided to the Department no later than 45 days after receipt of the Department’s intended action.
- j. Appendix M. Preparedness and Prevention Plan and Hazardous Waste Contingency/Emergency Response Plan.
 - i. Revise these documents as appropriate with correct street address information and changes to names of buildings/storage areas, etc.
 - ii. Revise/update the Emergency Contact Personnel/Response Agencies and Organizations list and the EQFL Organization Chart as appropriate.