

of the addressee, enclosed
front of this piece
U.S.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

DEC 16 1993

CERTIFIED MAIL

Mr. Mark H. Behel
Safety and Compliance Manager
Laidlaw Environmental Services of Bartow, Inc.
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: **Laidlaw Environmental Services of Bartow, FLD 980 729 610
Construction Permit HC53-170970
Request to Modify Permit Conditions**

Dear Mr. Behel:

We are in receipt of your request for modifications of the permit conditions. Those revisions requiring changes to the actual permit provisions are noted as follows:

<u>CONDITION</u>	<u>TO</u>	<u>FROM</u>
Date of Expiration	January 10, 1997	January 10, 1995

This letter must be attached to your permit and shall become a part of that permit.

Sincerely,

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

lrm

RECEIVED
DEC 09 1993

Certified Mail # P 644 593 473

December 6, 1993

Ms. Lynne Milanian
Hazardous Waste Permitting Branch
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Department of Environmental Protection
SOUTHWEST DISTRICT

BY _____

RE: Construction Permit
Laidlaw Environmental Services of Bartow, Inc.
EPA ID # FLD 980 729 610
Permit # HC53-170970

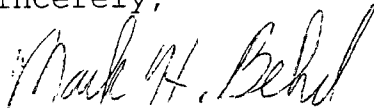
HC53-242189

Dear Ms. Milanian:

As discussed with you on 12/2/93, LESB omitted the \$50.00 fee required for processing an extension to a permit expiration date (F.A.C. 17-4.050(p)3.) in our original 11/24/93 request. Enclosed is a check in the amount of \$50.00. We apologize for the oversight and trust it did not cause you any inconvenience. Thank you for your consideration of our request.

If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel
Safety and Compliance Manager

pc: Mike Merashoff
Ashley Chadwick
E. Lin Longshore
Paul Manak
Barbara Hamilton

I N T E R O F F I C E M E M O R A N D U M

Date: 01-Dec-1993 10:04am EST
From: Lynne Milanian TPA
MILANIAN L
Dept: Southwest District Offi
Tel No: 813/744-6100
SUNCOM: 542-6100 Ext. 372

TO: Michael Hatcher TAL
TO: John Griffin TAL

(HATCHER_M @ A1 @ DER)
(GRIFFIN_J @ A1 @ DER)

Subject: LAIDLAW BARTOW HC

GOOD MORNING TO YOU BOTH:

LAIDLAW BARTOW IS REQUESTING AN EXTENSION OF THE EXPIRATION DATE FOR THEIR CONSTRUCTION PERMIT AUTHORIZING THEM TO BUILD SIX NEW STORAGE TANKS.

THIS PERMIT WAS ORIGINALLY ISSUED JAN 10, 1992 AND EXPIRED A YEAR LATER. AS SUCH, LAIDLAW HAS ALREADY RECEIVED ONE EXPIRATION DATE EXTENSION. HOWEVER, DUE TO ECONOMIC PROBLEMS, CONSTRUCTION HAS STILL NOT BEGUN AND LAIDLAW IS REQUESTING ANOTHER MODIFIED EXPIRATION DATE OF JAN 10, 1997, (THIS WILL PROVIDE LAIDLAW WITH AN ADDITIONAL TWO YEARS TO CONSTRUCT). I WILL GO AHEAD WITH ISSUE-ING THIS NEW EXPIRATION DATE UNLESS I HEAR OTHERWISE FROM YOU ALL.

THANKS,

LYNNE

Memorandum

**Florida Department of
Environmental Protection**

TO: Satish Kastury
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa
Hazardous Waste Regulation *lyme 11/30*

DATE: November 30, 1993

SUBJECT: ***Laidlaw Environmental Services (Bartow), FLD 980 729 610
Construction Permit HC53-170970
Request to Extend Expiration Date***

Attached are documents dated November 24, 1992 and submitted November 29, 1992 which are subject to the noted permit.

This package details:

1. One single page cover letter requesting an extension of the construction permit expiration date to January 10, 1997. This permit was originally issued on January 10, 1992.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV

lesbtran.doc

Certified Mail # P 809 530 393

November 24, 1993

Ms. Lynne Milanian
Hazardous Waste Permitting Branch
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

RECEIVED
NOV 29 1993

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

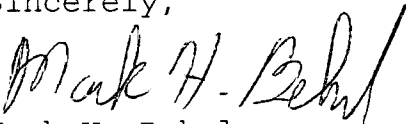
RE: Construction Permit
Laidlaw Environmental Services of Bartow, Inc.
EPA ID # FLD 980 729 610
Permit # HC53-170970

Dear Ms. Milanian:

As discussed in our 11-19-93 telephone conversation Laidlaw Environmental Services of Bartow, Inc. (LESB) is requesting an extension to the expiration date of the above mentioned construction permit. The extension is needed in order to finalize the engineering work, obtain the capital money, and construct the additions as permitted in the construction permit. LESB is requesting a two year extension which would provide a revised expiration date of January 10, 1997. Thank you for your consideration of our request.

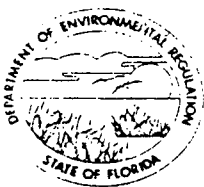
If you have questions or need additional information feel free to call me at 813-533-6111.

Sincerely,



Mark H. Behel
Safety and Compliance Manager

pc: Mike Merashoff
Ashley Chadwick
E. Lin Longshore
Paul Manak
Barbara Hamilton



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *WS* Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa
Hazardous Waste Regulation *Lynne 9/22*

DATE: September 22, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610
Construction Permit Application HC53-170970
Status of Construction Permit

Attached are documents dated September 10, 1992 and submitted September 14, 1992 which are subject to the noted permit.

This package details:

1. One cover letter indicating the anticipated construction plans and explanations concerning storage of wastes in tanks.
2. One original construction schedule.

Please provide any comments you may have within thirty days.

lrm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV

lesbtran.doc

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CERTIFIED #P 809 530 358
RETURN RECEIPT REQUESTED

D. E. R.

SEP 14 1992

SOUTHWEST DISTRICT
TAMPA

September 10, 1992

Ms. Lynne Milanian,
Permitting Engineer
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Laidlaw Environmental Services of Bartow, Inc. FLD 980729610
Hazardous Waste Facility Construction Permit #HC53-170970
EPA ID #FLD 980 729 610

Dear Ms. Milanian:

Your letter dated August 19, 1992 requested both information regarding anticipated construction plans for Laidlaw Environmental Services of Bartow, Inc. and assurances that the facility is being operated safely. The referenced construction permit covering a one year period, was issued on January 10, 1992 and will expire January 10, 1993. The permit application was first submitted in 1989, but construction could not be budgeted until the application was approved. Since the permit application was filed, changes in the role of the facility occurred when the facility became part of the Laidlaw network of treatment, storage, and disposal facilities.

A construction schedule projection was submitted with the completed Part B application on February 5, 1992. It outlined a two-year construction schedule (copy attached). Laidlaw's fiscal year begins September 1. The construction permit was issued in the middle of the facility's operating year. Construction is scheduled to begin during the current fiscal year.

You apparently are concerned that waste may be mismanaged because the facility has submitted a request to construct six new tanks. The request to construct new tanks was made in anticipation that receipts will increase enough to justify the additional capacity. Our company must attempt to predict future market opportunities and change as necessary to take advantage of them. Additionally, tank capacity is necessary to be responsive to the anticipated needs of our customers. In any event, our request for additional tanks is related to our desire to be responsive to future needs and is no indication of any difficulty in current operations.

You have also raised questions about tank R-203. Still bottoms tank R-203 was emptied, cleaned, and then inspected by an independent testing firm as part of an on-going assessment program for all process equipment. Upon finding that one area of the tank shell was below the 0.3125" thickness specified in the permit, the tank was immediately taken out of service. As stated in Steve Taylor's July 28, 1992 letter notifying the Department of the

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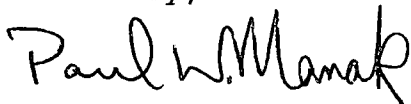
Ms. Lynne Milanian
September 10, 1992
Page Two

removal from service, Laidlaw has conducted an engineering study of the tank and possible repair options. At no time prior to the assessment has there been any indication that the tank is outside of acceptable permit requirements. Actions in this matter demonstrate responsible management practices and good inspection and maintenance procedures. As stated in the July 28 letter, the Department will be notified of actions taken to correct the situation prior to returning the tank to service.

The facility contingency plan does not mention keeping one tank empty for unexpected emergencies. The only references to this requirement is in the tank design section of the Part B Permit Application. We believe there is adequate reserve capacity included in in-service tanks, as well as empty 5,000 or 6,000 gallon tank trucks on site to provide emergency storage capacity. Additionally, tank T-111 has been maintained in an empty condition. It too, is available for emergency usage. This ability was pointed out during our July 22, 1992 meeting with Department staff.

We hope the above information adequately addresses your concerns. If you have any further questions, please contact Steve Taylor or me at this facility. We believe that this facility has demonstrated sound and responsible management, and we remain committed to maintaining regulatory compliance.

Sincerely,



Paul W. Manak
Facility Manager

PWM/pks

cc: Bartow Compliance Manager
Ashley Chadwick
Lin Longshore
Barbara Hamilton
Jim Green
Satish Kastury
Beth Knauss
Alan Farmer



ANTICIPATED CONSTRUCTION SCHEDULE

At this time we anticipate the following construction schedule. However, changes could occur depending on market needs and changes in company direction.

Within twelve (12) months after Part B approval:

- Addition of six (6) hazardous waste permitted storage tanks in the south tank farm.
- Acceptance of additional waste codes.

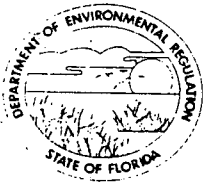
Within twenty-four (24) months after Part B approval:

- Expansion of drum storage building.

A handwritten signature in cursive script, appearing to read "Mike Sanderock", is written over a horizontal line.

Mike Sanderock
Facility Manager

2/5/91
Date



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

file

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: Gary Santi, Professional Engineer II, Tampa *607*
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Engineer, Tampa
Hazardous Waste Regulation *9/8*

DATE: September 8, 1992

SUBJECT: Laidlaw Environmental Services (Bartow), FLD 980 729 610
Construction Permit Application HC53-170970
Request to Extend Permit

Attached are documents dated August 25, 1992 and submitted August 26, 1992 which are subject to the construction application.

This package details:

1. One cover letter requesting an extension of the expiration date of the construction permit to at least two years.

As you know, Laidlaw has not begun any construction activities to date and the department's enforcement section has several violations pending based on the last inspection. Approval of this request will no doubt be based on compliance with the alleged violations. Please provide any comments you may have within 2 weeks.

Irm

Attachment

cc: Alan Farmer, Chief RCRA Branch, EPA/REGION IV
Beth Knauss, Enforcement, FDER - Tampa

lesbtran.doc

492



*discuss w/Beth doco she used this
as an incentive to her WLD
Resource Recovery*

Via Certified Mail
Receipt #P 809 530 360

D. E. R.

AUG 26 1992

SOUTHWEST DISTRICT
TAMPA

August 25, 1992

Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347
Attention: Lynne Milanian, Permitting Engineer

Re: Laidlaw Environmental Services of Bartow, Inc., FLD980729610
Hazardous Waste Facility Construction Permit #HC53-170970

Dear Mrs. Milanian;

With this letter, Laidlaw Environmental Services of Bartow, Inc., is requesting an extension of the referenced construction permit for two years. This extension is requested in part because the permit was only issued for one year, even though the construction plan submitted with the application outlined a two-year time schedule. Also, additional time is needed to evaluate market needs and related demands on the facility which will determine the scope and schedule of construction.

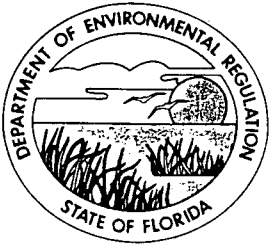
If you have any questions, please contact Steve Taylor or me at this facility.

Sincerely,

Paul W. Manak
Facility Manager

cc: Steve Taylor
Ashley Chadwick
Lin Longshore

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Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

August 19, 1992

Paul Manak
Laidlaw Environmental Services
170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Re: Laidlaw Environmental Services of Bartow, FLD 980 729 610
Construction Application File No. HC53-170970

Dear Mr. Manak:

The Florida Department of Environmental Regulation (FDER) is requesting information concerning the current status of the activities conducted by Laidlaw to date as authorized by your construction permit. Additionally, FDER requests an explanation for any future planned activity on this construction permit. As you are aware, the construction permit will be expiring January 10, 1993.

The RCRA permitting staff has been informed that tank R-203 has been taken out of service as tank shell thickness testing indicated thinning to a portion of the tank's wall. FDER is concerned that Laidlaw may be operating this facility in an unsafe manner as not enough waste storage capacity appears to be present in tanks. This concern is based on the fact that Laidlaw proposed the addition of six new tanks to handle expected waste loads, a reserve tank for unexpected emergencies mentioned in the contingency plan is not available, and now tank R-203 has been deemed unfit for use.

What assurances can you provide demonstrating that adequate tank storage capacity is available? What have you decided to do about tank R-203? If you decide to replace the tank, a tank closure permit will be required and must be followed by a tank construction permit for the replacement tank. If you elect to repair the tank it shall not be returned to service until authorization to do so is received from the FDER in accordance with 40 CFR Subpart J.

Please provide your written response to this notice within thirty days. Should you have any questions, do not hesitate to contact me at (813) 620-6100, extension 388.

Sincerely,

A handwritten signature in cursive script that reads "Lynne R. Milanian".

Lynne R. Milanian
Permitting Engineer
Hazardous Waste Program
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee
Beth Knauss, Enforcement, FDER - Tampa

lesb.doc

VIA CERTIFIED MAIL
RECEIPT # P 809 530 354

July 28, 1992

D. E. R.

JUL 29 1992

SOUTHWEST DISTRICT
TAMPA

Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Attention: Beth Knauss, Hazardous Waste

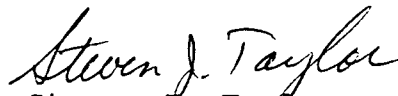
Re: Laidlaw Environmental Services of Bartow, Inc.
FLD 980 729 610
Hazardous Waste Operating Permit # H053-182726

Dear Mrs. Knauss:

In accordance with Specific Condition III.6 of the referenced permit, this letter constitutes notification of tank shell thickness below minimum specified in the permit for tank R-203. Tank shell thickness testing on this tank conducted on July 21, 1992, and again on July 23, 1992, confirmed the presence of one area of the side wall of the tank which has a thickness recorded as 0.216". All other measurements were in excess of 0.25". The tank has been cleaned and removed from service. The facility is evaluating the structural integrity of this tank, and repair or replacement options. The Department will be notified of actions taken to correct the situation prior to returning the tank to hazardous waste service, according to 40 CFR 264.196.

If you have any questions, please contact me or Paul Manak at this facility.

Sincerely,



Steven J. Taylor
Safety and Compliance Manager

cc: Paul Manak
Ashley Chadwick

2729A

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