1/19/83 ISR meeting.

JAN 7 1983

4AW-RM

Mr. Sidney A. Lewis, President
International Solvent Recovery, Inc.
6740 Crosswinds Drive North
St. Petersburg, Florida 33710

Re: RCRA Permit Application
EPA I.D. No. FLD980729610

Dear Mr. Lewis:

EPA, with assistance from the State of Florida, has performed a completeness review of the RCRA Part B permit application received December 1, 1982. This second application was a substantial improvement over the original. You will note that the enclosed Outline of Deficiencies now deals primarily with technical aspects, particularly structural and waste management concerns in the storage area.

Since International Solvent and Recovery will be a new facility, we have revised the Outline of Deficiencies to accommodate items that cannot be adequately addressed until the facility is constructed and/or becomes operational. The righthand column of the Outline now provides a code (T) to indicate those items we feel are technically inadequate and must be satisfied before a permit can be issued. A second code (C) indicates those items which may be incorporated as permit conditions.

If you have any questions concerning our comments or the requirements for an application, please contact Ms. Rita Ford in our Waste Engineering Section at (404) 881-3067. Because the State of Florida has assisted EPA in the review of your application, you may find it beneficial to meet with the Florida review team before submitting a revised application. If you wish to schedule such a meeting, please contact Mr. Craig Diltz with the Florida Department of Environmental Regulation at (904) 488-0300.

Sincerely yours,

James H. Scarbrough, Chief
Residuals Management Branch

Enclosure

cc: Craig Diltz, FL DER, Tallahassee ✓
Dick Powell, FL DER, Tampa
Mark Worley, ISR

AN OUTLINE OF DEFICIENCIES FOR THE PART B APPLICATION SUBMITTED BY:

International Solvent Recovery, Inc.
6740 Crosswinds Drive, North, Suite D
St. Petersburg, Florida 33710

I.D. No. FLD980729610

A-1	The EPA identification number is not included.	C
A-2	Indicate the forms were attached for Section E.	C
A-8	The facility contact phone number is inconsistent with the numbers given on page 244 and on the Hazardous Waste Activity Notification form. Is ISR also the landowner?	C
A-11	The attached USGS Tophographic map should be referenced.	T
A-14	The EPA identification number is not included.	C
A-15	The date operation began is not correct. This company is considered as a new facility.	C
A-16	The amount for process codes S02 should be summed to reflect the total design capacity. The design capacity for the storage processes does not correspond with the information provided in the rest of the application. We are not considering the tank truck as a storage unit.	T
A-17	The EPA hazardous waste numbers do not correspond with the waste streams given in the other sections of the application or in the Notification form. The unit of measure is not appropriate for reporting the estimated annual quantity of waste.	T
A-18	One of the site plans provided in the main body of this application could be referenced, even though a Part A facility drawing is not required for new facilities.	
A-20	Latitude and longitude should be corrected.	T
A-22	The facility owner referred to on page 4 of 5 is the landowner, not the building/structures owner. They will change	T

C - Permit Condition
T - Technical Adequacy

Maps

B-2 The maps submitted were inadequate in that:

1. A 1 inch:200 foot site map should be included and contain the following information:

a. Contours sufficient to show surface water flow. (A construction blueprint may be submitted.) C

b. The area 1000 feet beyond the property line. (Submit aerial photograph with contours to the south.) T

c. Surrounding land use. (Zoning map.) T

d. Buildings, structures and sewers. (Submit aerial photograph to south. Map sewers in area.) T

e. The loading and unloading areas. (May be submitted on blueprint.) T

f. Runoff control systems. (May be submitted on blueprint.) C

2. The withdrawal well noted in the legend was not located on the map. T

P.15 C-1 They will submit permit application Laboratory analyses reports of results or existing published or documented data on the hazardous wastes or hazardous wastes from similar processes were not included. Pure product chemical data is not sufficient for this requirement. C

P14 C-2f There is a contradiction between page 2 (Ix., E., Block 3) of the notification (EPA form 8700-12) and page 19 of the text (paragraph 3, line 1) regarding the handling of reactive waste. T

P 108 App K D-1a(1) The application should include a specific description of the containers addressing: the types, construction materials, dimensions, liner specifications, manufacturer specifications, and waste/container compatibility determinations. T

D-1a(2) Drawing epoxy The applicant should consider container dimensions with respect to pallet size and stacking practices. The maximum height of the containers is not given. The design capacity of the storage area and containment capacity should be re-evaluated based on actual container dimensions and building structural supports. (Beams are inside building and affect spacing.) T

The applicant should address waste type locations for ignitable, reactive and incompatible wastes. Machinery, equipment and procedures for the movement of waste should be addressed. (How will curbs be jumped? Is opening high enough for forklift T

to enter?) Specific detail should be given to loading and unloading ramps (including their design specifications) and the negotiation of curbs with equipment.

D-1a(3) The proposed design drawing of the containment area conflicts with the management practices reported in the text. The description of curbs should include their width. The diagram on page 103 conflicts with the engineering drawing with respect to the uniform thickness of the concrete base. The engineering drawing should include the base grades and slopes. T

The design specifications of the storage building should be included. C

D-1a (3)(a) The applicant should demonstrate that the base material construction and characteristics are compatible with and impervious to the hazardous wastes. Specifications for seams and caulking should be included. T

D-1a (3)(b) The diagram on page 105 indicates that drainage will be towards the south on the west side of the storage area. The text and design drawing do not indicate the grade in this direction (see D-1a(3)). T

Include the location, function and specifications of the drainage valve for run-off mentioned on page 30. The applicant must demonstrate that the containers will not be in contact with liquids when the system contains accumulated liquids equal to 10% of the design capacity of the storage unit. (46 FR 55110, November 6, 1981)

D-1a (3)(c) The containment structure capacity cannot be evaluated without further information (see D-1a(1), D-1a(2), and D-1a(3)). T

D-1a (3)(d) Is not included. T

D-1a(4) How will accumulated liquids be disposed of, if determined not hazardous? The applicant should specify the frequency of removal of accumulated liquids from the collection area. C

D-2a The tank structural support information is not included. (Drawings from Bethlehem Steel show 3 tie downs.) The applicant must designate which design specifications will be used for the flammable solvent tanks and which specifications will be used for the "heavy" solvent tanks. The tank design standard code and year is not included. T

D-2b The flammable liquids tanks will no longer meet Underwriters Laboratory specifications at the 25% permissible corrosion limit mentioned in the text. Our calculations indicate that 40% overdesign (stated on page 117) has not been achieved according to the specifications on page 126. Tests or documentation to substantiate tank ~~construction~~ compatibility with the wastes has not been included. T

D-2c	The description of controls to prevent overfilling is insufficient. The application should demonstrate how a one minute warning is sufficient time to operate the waste feed cut off. Insufficient detail is provided for piping, flexible hoses, couplers, valves and pumps. The application should include the design specifications of this equipment. An engineering drawing should be included to indicate the locations of the pumps, piping, intake and discharge structures in the tank storage area.	T
F-1a(3)	The warning signs need to be placed at the main entrance to the facility.	C
F-2a	An overall schedule needs to be submitted to meet the regulatory requirements of this section. A checklist for the operating log is inadequate. In addition, the schedule should address inspections of safety equipment, tank pads, and tank anchoring devices, gate and fencing, the base of the containment system for deterioration in the drum storage area, and any other operating or structural device vital to pevent, detect, or respond to environmental or human health hazards.	C
F-2a(1)	See comment F-2a. Needs to be in a schedule format with each type of problem addressed.	C
F-2a(2)	See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed. The alarm systems will be inspected on a daily basis through usage. Any repairs needed will be noted on an incident report form.	C
F-2b	See comment F-2a.	C
F-2b(1)	See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed including the secondary containment system in the drum storage area for integrity and accumulated liquids.	C
F-2b(2)	See comment F-2a. All items should be included in a schedule. The test procedure for tank shell thickness (ultrasound) is not included.	C
F-2c	See comment F-2a. Does not address remedial actions for all types of problems included in the inspection logs.	C
F-2d	A date for remedial action taken is not specified.	C
F-4	Prevention of contamination of water supplies was not addressed.	T
F-5b	The compatibility matrix does not have a one to one correspondence with the proposed waste streams; therefore, a conclusion cannot be drawn concerning the compatibility of the waste streams. Give source of table.	C

Part G	Once the facility becomes operational, the contingency plan should be amended to include the following items and information:	C
G-1	The facility owner or operator's name and location map delineating access routes to the site.	
G-2	The names, titles, addresses and phone numbers of the emergency coordinator and his alternate. The contradiction noted between page 43 (Plant Manager) and page 1 (Vice President) of the attached contingency plan should be resolved, designating a permanent emergency coordinator.	
G-4g	Provisions should be include for the prevention of incompatible waste treatment, storage or location in affected areas until after cleanup has been completed (see C-2f).	
G-7	The specific rally points in the event of evacuation should be included.	
G-4c	Notification of authorities should also include the Bureau of Disaster Preparedness for emergencies after normal working hours. (904) 488-1320.	C
G-4f	The applicant has stated that at all times, the facility will keep sufficient unused storage capacity to accommodate the volume of the largest tank in the dirty solvent tank farm (page 123). The location of this emergency storage capacity is not demonstrated elsewhere in the application.	T
G-4h	An example of the post-emergency equipment checklist should be included.	C
G-5	The location of emergency equipment listed on page 15 is not included. First aid and medical supplies are not addressed in the attached contingency plan. Emergency communication and alarm system locations are not addressed in the contingency plan.	T
G-6	State why only chemical information (no facility information) was given to hospitals. This will explain the contradiction between pages 97 and 98, and pages 238 to 241, regarding which information was actually distributed.	T
Part H-1	Once the facility becomes operational, the training record should be amended to include the following items and information to demonstrate implementation of training program:	C
H-1a	Need to leave a place for an employee's name in the format of the job description.	
H-1b	Training content, frequency and techniques.	

H-1c	Need to include a position for a training director or incorporate it into one of the existing descriptions; in addition, an alternate emergency coordinator needs to be designated.	
H-1d	Relevance of training to job position is not included.	
H-1e	Documentation that emergency response training has been successfully completed is not included to demonstrate employee competency in procedures, equipment, and systems.	
I-1c	The maximum inventory is reported in conflicting volumes between the closure plan (250 drums) and the closure cost estimate (170,880 gallons) and fails to address the disposal of the waste produced from decontamination of the tanks, drum storage area, production equipment, and all other contaminated equipment, in the event the production facility is inoperable upon closure. (RCRA does not require decontamination of production equipment.)	C
I-1d	An inventory of all contaminated equipment requiring decontamination is not included. Advise if you wish checklist on page 156 to serve as an inventory.	C
I-1d(1)	See comment I-1c above.	C
I-1d(2)	See comment I-1c above.	C
I-4	Closure cost estimate fails to account for off-site disposal of the waste produced from decontamination of the tanks, drum storage area, production equipment, and all other contaminated equipment, in the event the production facility is inoperable upon closure.	C
K	Signature of landowner on page 248 has been omitted.	T