



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4AW-RM

11-9-82

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

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

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

Dear Mr. Lewis:

EPA has completed the initial review of the RCRA Part B permit application received October 4, 1982. Because this is a new facility, you should have submitted both Part A and Part B of the permit application (40 CFR §122.22(b)). Although the regulations (§124.3) provide that the processing of a permit should not begin until the applicant has fully complied with the application requirements, EPA, with assistance from the State of Florida, has reviewed the information you have submitted.

We feel that the submission of this application was somewhat premature in that the specific types of equipment and waste to be processed have not yet been determined. Without definite information for these items, the adequacy of other parts of the application cannot be determined. We will need the following specific information to do an adequate review: (1) a finalized topographic map and plot plan of the facility, (2) the specific types of waste to be handled at the facility, (3) the specific types of tanks to be utilized for storage of the waste, (4) the specific types of containers that will be used for storage of the waste, and (5) specific engineering data concerning bases and containment systems used at the facility.

Without the above information, we cannot assess the adequacy of contingency planning, training, preparedness or other general aspects of the facility. Therefore, the enclosed outline of deficiencies cannot be considered our final comments on the application. Your response to our comments may be in the form of a totally revised complete application or revised pages to be inserted into your original submission. If you choose to submit revised pages, please provide the following information:

- 1) Page numbers should be shown.
- 2) For each page submitted, indicate if it is a revision to a page in the original submittal or a new page not contained in the original submittal.

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- 3) Date or code each page. For example, 32(R-9/10/82) would be page 32, revised 9/10/82.

The revisions to your application must include a certification as required by 40 CFR §122.6(d).

Please submit five copies of your revisions to:

U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365
ATTN: James H. Scarbrough

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. The State of Florida has assisted EPA in the review of your application. You may find it beneficial to meet with EPA and the State to discuss the deficiencies found in the 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: Florida Department
of Environmental Regulation

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

EPA I.D. No. FLD980729610

<u>Regulatory Requirement</u>	<u>Deficiency/Comment (Numbered to Match Checklist)</u>
<u>122.22(b)</u> <u>122.4</u> <u>122.24</u>	<u>Part A Application</u> Applicant must submit Part A of the application.
<u>122.25</u>	<u>Part B Application</u>
<u>122.25(a)(1)</u>	<u>B-1 General Description</u> Applicant should describe the type of industries it proposes to serve.
<u>122.25(a)(19)</u>	<u>B-2 Topographic Map</u> Maps should be submitted identifying all checklist items based on actual design and layout of the facility. This requirement cannot be properly evaluated until the company decides how the facility will be constructed.
<u>122.25(a)(11)(ii)</u> <u>264.18(b)</u>	<u>B-3b Floodplain Standard</u> Application must include a copy of relevant FIA map or equivalent map to indicate floodplain.
<u>122.25(a)(10)</u>	<u>B-4 Traffic Information</u> Traffic patterns, controls, access roads, road surfacing, and load bearing capacities are not adequately addressed.
<u>122.25(a)(2)</u> <u>264.13(a)</u>	<u>C-1 Chemical and Physical Analyses</u> Specific waste streams are not included. Waste specific information must be included to properly evaluate the remaining sections of the application. <u>C-1a Waste to be Stored in Containers</u> This information has not been provided. See comment C-1. <u>C-1b Waste to be Stored in Tanks</u> This information has not been provided. See comment C-1.

122.25(a)(3)
264.13(b)(1)

C-2a Parameters and Rationale in Waste Analysis Plan

Rationale is not given for the parameters chosen.
Parameters chosen are not sufficient for proper management.

264.13(b)(2)

C-2b Test Methods

Specific test methods are not referenced.

264.13(b)(3)

C-2c Sampling Methods

Plan must identify specific sampling methods for each type of shipment (sampling containers, sampling tanks).

264.13(b)(4)

C-2d Frequency of Analysis

Applicant needs to specify frequency and criteria for sampling incoming loads.

264.13(b)(5)

C-2e Requirements for Waste Generated Off-site

Plan must state what waste analyses parameters that generators have agreed to supply. Also, plan must address representative sampling by generator.

264.13(b)(6)

C-2f Ignitable, Reactive, or Incompatible Waste

Specific flash point tests should be referenced. There is a contradiction on pages 5 and 12 regarding handling of reactive waste.

122.25(b)(1)(i)(A) D-1a(1) Description of Containers

264.171

264.172

A mobile tank is defined as a container and should be addressed as such. Are only 55-gallon drums accepted? Except for visual inspection of containers, other checklist items are not addressed.

264.173

D-1a(2) Container Management Practices

There is no indication that containers are always kept closed during storage. Demonstrate that pallet dimensions and construction materials are adequate to support triple stacking. No specific locations for ignitable, reactive or incompatible wastes are given. Empty container and sludge management are not addressed. Applicant does not demonstrate compliance with National Fire Protection Association standards for stacking stored materials (NFPA-231C).

122.25(b)(1)

264.175(b)

D-1a(3) Secondary Containment

Calculations for containment capacity are not correct. The drawings show 13 pallets per row while calculations use 12

per row. Applicant should demonstrate that standing liquids do not remain on the base longer than one hour after leakage...unless the containers are elevated or in some other manner are protected from contact with accumulated liquids.

122.25(b)(1)(ii) D-1a(3)(a) Base to Contain Liquids

264.175(b)(1)

264.176

Applicant must submit information on design on construction of containment base.

122.25(b)(1)(i)(B) D-1a(3)(b) Containment System Drainage

264.175(b)(2)

Drawing contradicts the narrative as to east to west slope. More specific engineering drawings should be submitted. Specific handling practices should be included.

122.25(b)(1)(i)(C) D-1a(3)(c) Containment System Capacity

Calculations given are incorrect. The other items of this section cannot be evaluated without final engineering drawings and calculations. Storm intensity data are not given.

122.25(b)(1)(i)(D) D-1a(3)(d) Control of Run-on

264.175(b)(4)

All items should be included in the engineering drawings with calculations and narrative incorporated into the final site design.

122.25(b)(1)(i)(E) D-1a(4) Removal of Liquids from Containment System

264.175(b)(5)

Specific details and engineering evaluations are not given.

122.25(b)(2) D-2 Tanks

All portions of Section D-2 cannot be adequately evaluated until specific types of tanks and containment structures are included along with their design specifications and engineering information. Specific wastes handled, including sludges, should be addressed.

122.25(a)(4) F-1a(2)(b) Means to Control Entry

264.14(b)(2)(ii)

The location of the three gates should be shown. The explanation of how office personnel will be able to control access during operating hours is inadequate. The means to gain access to facility after hours should be included.

264.14(c) F-1a(3) Warning Signs

The warning signs should be placed at all entrances and in sufficient number to be seen from any approach to the active portions of the site.

- 122.25(a)(15)
264.15(a) & (b)
264.33 F-2a General Inspection Requirements
Inspection schedule must include: monitoring equipment, emergency and safety equipment, and security devices.
- 264.15(b)(3) F-2a(1) Types of Problems
Inspection schedule has not addressed all of the potential problems. See comments F-2b(1) and F-2b(2).
- 264.15(b)(4) F-2a(2) Frequency of Inspection
This section is incomplete. See comments F-2b(1) and F-2b(2).
- 122.25(a)(5)
264.174 F-2b(1) Container Inspection
This section does not address inspections of the mobile tank and the integrity of the containment system.
- 264.194 F-2b(2) Tank Inspection
The inspection schedule should be revised to address all of the checklist items for the specific tanks to be installed at the facility.
- 264.194(c) F-2c Remedial Action
The inspection schedule must describe the procedure for taking remedial action when an inspection reveals a problem.
- 264.15(d)
264.73(b)(5) F-2d Inspection Log
A date and time, inspector's name, the observations made, and the nature of repairs need to be included on all inspection logs.
- 122.25(a)(6)
264.32(c) F-3a(3) Emergency Equipment
Decontamination equipment is not addressed.
- 264.32(d) F-3a(4) Water for Fire Control
Maps and narrative do not agree on fire hydrants and extinguishers.
- 122.25(a)(8) F-4 Preventive Procedures
Prevention of the contamination of the water supplies and mitigation of effects of equipment failure and power outages have not been addressed.

- 122.25(a)(9)
264.17(a) F-5a Precautions to Prevent Ignition or Reaction of Waste
Grounding of drums during pumping and pump specifications with respect to sparking have not been addressed.
- 122.25(b)(1)(iii)
264.177 F-5d Incompatible Waste in Containers
The procedures used to insure that the incompatible wastes and materials are not placed in the same containers or in unwashed containers that previously held incompatible wastes have not been addressed.
- 122.25(b)(2)(vi)
264.199(b) F-5f Incompatible Wastes in Tanks
The applicant does not address incompatible wastes in tanks.
- 122.25(a)(7)
264.52
264.53 G-1 Contingency Plan
Because the plan will be given to outside response agencies, it must stand on its own and not rely on information contained elsewhere in the application. The facility name and location and the owner's name as well as a description of the facility operations have not been included in the contingency plan.
- 264.52(d) G-2 Emergency Coordinators
The name, address, office and home phone numbers, and the duties of the primary and alternate coordinators as well as a statement authorizing the designated coordinators to commit the necessary resources to implement the contingency plan have not been included.
- 264.56(d) G-3 Implementation
Criteria for implementing the contingency plan in the event of a spill has not been addressed.
- 264.56(d)(2) G-4a Notification
FDER phone number is incorrect.
- 264.56(c)
264.56(d) G-4c Hazard Assessment
A procedure of assessing the possible hazards to the environment and human health have not been addressed: The procedures for determining the need for evacuation have not been addressed. The need to notify local authorities during spills has not been addressed.
- 264.52(a)
122.27(b)(2)(ii)(G) G-4d Control Procedures
There is no indication that the emergency coordinator is notified for spills; explosions have not been addressed.

- 264.56(e) G-4e Prevention of Recurrence
The procedures for the removal and isolating of containers have not been described.
- 264.56(g) G-4f Storage of Released Material
Decontamination after a fire has not been addressed. Procedures for deployment of the resources for the storage and treatment of the released materials have not been addressed.
- 264.194(c) C-4j Tank Spills and Leakage
Tank repairs are not addressed.
- 264.52(e) G-5 Emergency Equipment
Only two of the three fire hydrants and only eight of nine fire extinguishers are located on the site plan. The equipment listed on page 39 is not given a location; there are no first aid and medical supplies mentioned; emergency communication or alarm systems have not been addressed.
- 264.52(c)
254.37 G-6 Coordination Agreements
A description of the cooperative agreement with the local police, fire departments, and hospitals, has not been addressed in the plan. A statement that indicates that a copy of the contingency plan will be submitted to these organizations has not been included.
- 264.52(f) G-7 Evacuation Plan
Evacuation is not adequately addressed.
- 122.25(a)(12)
264.16 H-1 Training Program
Outline of training program does not show training will be designed to meet job tasks.
- 264.16(d)(1)
264.16(d)(2) H-1a Job Titles and Duties
Job duties and descriptions need to be supplied with each job title.
- 264.16(d)(3)
264.16(c) H-1b Training Content
The type of training that each employee will receive and the frequency in which the employee will be receiving training has not been included.

264.16(a)(2)

H-1c Training Director

A demonstration that the program is directed by a person trained in hazardous waste management has not been included.

264.16(a)(3)

H-1e(1) Use of Emergency Equipment

Documentation that adequate training for the procedures for the use, inspection, repair and replacement of facility emergency and monitoring equipment has not been addressed.

264.16(a)(3)(ii)

H-1e(2) Automatic Waste Feed Cutoff

264.16(a)(3)(iii)

H-1e(3) Communications or Alarm Systems

H-1e(5) Response to Groundwater Contamination

Training program outline must include key parameters for waste feed cutoffs, communication or alarm systems and response to groundwater contamination.

264.16(d)(4)

H-2 Implementation of Training Program

264.16(b)

There is no indication that training will be successfully completed by facility personnel within six months of their employment.

122.25(a)(13)

I-1c Maximum Waste Inventory for Closure Plan

264.112(a)(2)

Maximum inventory will be the amount of waste in the drums as well as in the tanks at the time of closure. There is no salvage value allowed.

264.114

I-1d Inventory Disposal

There is no demonstration that decontamination has been effective.

264.178

I-1d(1) Closure of Containers

The disposal should address all 2,016 drums; decontamination and disposal of the empty drums have not been addressed; verification of the decontamination has not been addressed; and the maximum inventory has not been addressed.

264.197

I-1d(2) Closure of Tanks

There is no verification of decontamination. Maximum inventory of wastes in tanks should be included.

264.112(a)(4)

I-1e Schedule for Closure

The inspection schedule has not been addressed.

122.25(a)(15)
264.142

I-4 Closure Cost Estimate

The maximum inventory of the drums and tanks has to be included in the disposal costs.

122.25(a)(20)

Part J Other Federal Laws

Applicant must address compliance/applicability of requirements of other federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and Fish and Wildlife Coordination Act.

122.6(a) & (d)
122.25

Part K Certification

Application must include certification by professional engineer of all engineering drawings data and calculations.