



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 28 1993

4WD-RCRA

Mr. Satish Kastury
Environmental Administrator
Hazardous Waste Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

JUN 30 1993
HAZARDOUS WASTE
PERMITTING

RE: Comments on Draft RCRA Facility Assessment (RFA) Report
Universal Waste and Transit, Tampa, Florida
EPA I.D. No. FLD 981 932 491

Dear Mr. Kastury:

The United States Environmental Protection Agency (EPA) has reviewed the Draft RFA Report for the above referenced facility. This report was submitted to EPA by the Florida Department of Environmental Regulation (FDER) in fulfillment of a corrective action workplan commitment in the FY-93 grant. Enclosed herewith are specific comments on the report.

Please have your staff review these comments and address them as appropriate in the final RFA report. I sincerely hope these comments prove helpful in preparing future RFA reports. If you have any questions in this matter, please contact Harry Desai, of my staff, at (404) 347-3433.

Sincerely yours,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: Ms. Lynn Milanian, FDER, Southwest District, Florida

COMMENTS ON THE DRAFT RFA REPORT
UNIVERSAL WASTE AND TRANSIT
EPA I.D. NO. 981 932 494

- X 1. The Executive Summary should include only the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) related activities. The list of hazardous wastes stored at the storage facility should be deleted from the Executive Summary because they are listed in the RCRA permit. In addition, Appendix C - "Permitted RCRA Wastes Summary", in the RFA Report, provides this information. A reference in this matter should also be made in Section II F - "Regulatory Applicability and History".
- X 2. The last paragraph of the Executive Summary should include a short explanation regarding the purpose of the monitoring wells and a background history of the Universal Waste and Transit site. Specifically the status of the Stauffer Chemical and Helena Chemical sites, since the reference regarding groundwater monitoring is made in the Executive Summary of the RFA Report.
- X 3. Page I-1 - Executive Summary - Last Paragraph - The report mentioned that at the time of the VSI site inspection by the Environmental Protection Agency (EPA) in August 1988, this was a new facility. Please note that the construction of the facility was not completed at the time of inspection by EPA. The error regarding the new facility should be corrected.
- X 4. Facility Description - A clarification is needed regarding physical treatment. The RCRA permit includes a filter press for physical treatment. However, the permittee cannot use the filter press because the storage in the tank, which is essential for the operation of the filter press, is not permitted. The status of the permit application or permit modification for the storage tank should be clarified in this section.
- X 5. Waste Management Practices - Are "tote tanks" and "jumbo sacks" permitted for storage? This should be clarified. Also, is storage on open pallets permitted? Since the pictures of this practice are included in the RFA Report, the waste management practices need to be discussed in detail. *with sheet*
- X 6. Waste Management Practices - The report mentioned that inspection of the containers and the containment areas are performed daily. Does the facility maintain an inspection log?. Detailed description is needed. *Delete photos*
newly approved

response
no
substance

7. Facility Waste Generation - This section needs to discuss, in detail, the waste generated and the activities at all identified SWMUs. Information should be provided as to where waste is generated and how it is handled. This section in the report does provide descriptions of SWMUS, but fails to discuss the waste generation and handling practices.

Check
Capacity ?

8. Facility Waste Generation - SWMU #4 (Filter Press) - The dimensions and capacity of this SWMU should be provided. Since this is a regulated unit, the text should provide more information about specific uses of this unit and the reason for permitting it. Particularly, since it is not operable without the storage tank permit.

Area for
new photo

9. Figure No.2 - SWMU #3 is cut off. Please include a new location map showing all SWMUs.

Partly
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but
substant

10. Facility Waste Generation - SWMU #6 (Storm Water Pretreatment Unit) - The limitations of the sump pump flow rate (30 gals. per minute) and the flow rate to the pretreatment unit (5 gals. per minute) from the sump tank, should be explained. Also, the possibility of over flow from the pretreatment unit (SWMU #6) to the ground should be addressed.

Add
note

11. Regulatory Applicability and History - The Waste Minimization and Land Disposal Restriction provisions are mentioned in the report. The Air Emission Standards for process vents - 40 CFR § 264.1030, Subpart AA and Air Emission Standards for Equipment Leaks, 40 CFR 264.1030, Subpart BB, should also be included in this section of the report.

Area
John

12. Release History - Figure 3, " Monitoring Well Location Map", A reference regarding the Helena Chemical Superfund site is made in the report. However, the site map does not show the location of the site. Include this Superfund site on the map and also, include the direction of the groundwater flow.

13. Flood Plain - Figure 4 - The UW&T site location is not shown on the map.

Review
to describe
Hence

14. Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) - Why are three groundwater monitoring wells considered AOCs?. These monitoring wells are used to monitor the contaminant levels at the Universal Waste and Transit's (UW&T) site. The facility wants to establish that the contaminants are coming from the adjoining Stauffer Chemical and Helena Chemical Superfund sites and not from UW&T. The three monitoring wells do not seem to fit the definition of AOC (see below). Therefore, if it is necessary the AOC (three monitoring wells) should be renamed.

Definition - Area of Concern

Any area having a probable release of a hazardous waste or hazardous constituent which is not from a solid waste management unit and is determined by the Regional Administrator to pose a current or potential threat to human health or the environment.

15. The groundwater samples from the three monitoring wells at the UW&T's site indicate the presence of hazardous waste contaminants. Therefore, the whole of UW&T's site will require further investigation. UW&T should demonstrate that the contaminants found in the groundwater samples are not from any SWMUs on the site. This information should be included in the text of the RFA Report. *Section IV Summary & conclusions*

Add 16. As background information, a brief summary of contaminants that have been found in the three monitoring wells should be provided in the report.

17. Table 1 - SWMU Identification Summary

a. The Pollution Migration Pathways column should include groundwater, soil and/or surface water for SWMU #1, SWMU #2, SWMU #4 and SWMU #5. It is conceivable that a spill in the storage area could cause the pollutants to move in other migration pathways.

Delete + b. Table 2 - Delete this table if it is established that the three monitoring wells are not Areas of Concern.

18. SWMU Data Sheets

Remove + a. SWMU #1 - In the comments it should be mentioned that this is a regulated unit.

+ b. SWMU #2 - Loading Dock - This is not a Concrete Surface Impoundment. It should be renamed.

+ c. SWMU #2 - If there is a crack in the concrete, soil and groundwater might be pollutant release pathways. Please address these on the data sheet.

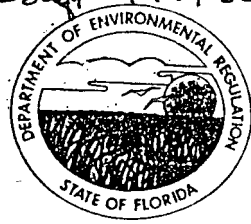
d. SWMU #6 - Pretreatment Unit- Sump tank is part of the pretreatment unit, therefore it should be included in this SWMU. The limiting factors are size of the tank and capacity of the sump pump and the feed rate to the pretreatment unit.

e. Photographs - There are many photos that are unrelated to the RFA (e.g. batteries stored on a pallet, picture #25 showing a storage area....., Are these SWMUs?). Explanation about RFA related photos should be provided in the text of RFA Report. Please review all photographs and remove unrelated photos or provide explanation in the text of the report as to why these photos are pertinent.

*Review
in comments
Photos*

EPA's comments on
Draft RFA report

Black Book



Florida Department of Environmental Regulation

RCRA PERMITTING -- ROUTING SLIP

FACILITY/ITEM: Universal Waste & Transit

PATS NO: HO29-171163

<u>TO</u>	<u>NAME</u>	<u>INITIALS</u>	<u>DATE</u>
___	SATISH KASTURY	_____	_____
___	MERLIN RUSSELL	_____	_____
___	SHELTON GRAVES	_____	_____
___	AMRISAR KAHAROEDDIN	_____	_____
___	JIM LADNER	_____	_____
___	BILL LINN	_____	_____
___	JOYCE PAPP	_____	_____
___	CAMILLE PLAUTZ	_____	_____
___	CINDY SMITH	_____	_____
___	MICHAEL HATCHER	<u>MIT</u>	<u>7-2</u>
<input checked="" type="checkbox"/>	BHEEM KOTHUR	<u>BK</u>	<u>7/6/93</u>
___	JOHN GRIFFIN	_____	_____
___	ALEX ON-WUTAKA	_____	_____
<input checked="" type="checkbox"/>	WANDA PARKER	_____	_____
___	RABIN PRUSTY	_____	_____
___	RAVI SHAH	_____	_____
___	HARBHAJAN SINGH	_____	_____
___	DIANE HUNT	_____	_____
___	WILL WILLIAMSON	_____	_____
___	_____	_____	_____
___	_____	_____	_____

REQUIRED ACTION & COMMENT: URGENT() ROUTINE()

RETURN TO: Michael Hatcher FOR FILING !

LOGGED IN

FLD-981-932-494

ROUTING AND TRANSMITTAL SLIP

Date

6/28/53

TO: (Name, office symbol, room number, building, Agency/Post)

Initials Date

1. <i>Satish</i>		
2.		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Two different letters attached.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

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OPTIONAL FORM 41 (Rev. 7-76)

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FPMR (41 CFR) 101-11.206