

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 27, 1982

Mr. James H. Scarbrough
Chief, Residuals Management Branch
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Scarbrough:

We have performed our completeness and technical review of the Part B Application submitted for International Solvent Recovery, Inc., St. Petersburg, Florida, EPA I.D.# FLD980729610. You will find enclosed our checklist for storage facilities and Outline of Deficiencies which were prepared based on this review. To assist you in following the outline and checklist we have listed on the checklist those items which were either present and adequate as submitted in the application or not applicable. These materials will be identified by section and page number in the Part B. Those portions of the checklist which are not applicable are designated by "N.A." in the comments section; those which are present and adequate in the form submitted are designated by "O.K." in the comments. The Outline of Deficiencies follows the checklist outline and states which material is not included in the application for incomplete items and gives a brief description of adequacy for items that were submitted but are inadequate. The designation "O.D." in the comments section of the checklist will refer you to those items which are listed in the Outline of Deficiencies.

We feel that the submission of this application was somewhat premature in that the specific types of equipment and waste received have not yet been determined. Without definite information for these items, other parts of the application cannot be adequately addressed. We feel that the applicant should be required to submit the following specific information and that we be given the opportunity to conduct another completeness review based on this submittal. Specific information we will need to do an adequate review are: (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

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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 this information, it is very difficult to assess contingency planning, training, preparedness, or the other general aspects of the facility.

The comments listed on the Outline of Deficiencies are based on our review of this inadequate material and therefore cannot be considered our final comments on the application. These will be made upon submission of items mentioned above as well as the remainder of the application based on the finalized plans.

The inadequacy of this application also raised the question as to administratively whether or not it was actually submitted. Section 124.3(a)(2) states that permits shall not be processed until the application requirements are met. Also, Section 122.22(b)(1)(2) indicates that an application for a new facility should include Parts A and B. We are not confident that the Part A information was ever properly submitted in this application and therefore review possibly should not have begun. We would appreciate your opinion as to what constitutes a properly submitted application for review. This matter is likely to reoccur in the future, and we feel that a policy should be established at this point as to how to handle inadequate submittals.

We trust that this information will be sufficient for your purposes. We will be available to answer any questions you may have concerning the material. We will also gladly consider any suggestions you may have for modification of our review procedures or the material that is forwarded to you based on our review. Any questions you have should be directed to Craig Diltz.

Sincerely,

Robert W. McVety

Robert W. McVety
Environmental Administrator
Solid & Hazardous Waste Section

RWM/cd/e

Enclosure

cc: Southwest Florida District Office