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

February 16, 1983

International Solvent Recovery, Inc.
Polk County
FLD 980 729 610
HT 53-60967

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

Dear Mr. Scarbrough:

The Department has completed its review of the resubmittal by International Solvent Recovery, Inc., FLD 980 729 610, for their Part B Application. From this review we have identified the items attached as deficiencies which should be further clarified or readdressed. The outline of deficiencies refer to the RCRA Part B Review Checklist for Storage Facilities. You have a completed copy which was forwarded to your office along with our previous review comments.

We feel that since this facility is not yet constructed, it would be appropriate at this time to issue the Part B permit and include the items in the attached outline of deficiencies as permit conditions. It would then be a requirement of the permit that operations shall not begin until all items included in this outline of deficiencies as well as the other conditions of the permit are met and approved in writing by your agency. If this procedure is agreeable with you, we would appreciate guidance from your staff as to the steps we should take in preparing the draft permit and other associated documentation. We will begin this task upon your concurrence and instruction.

Should you have any questions regarding the outline of deficiences or the procedure which we have suggested for issuance of the permit, please contact Craig Diltz.

Sincerely,

Robert W. McVety

Robert W. McVety
Environmental Administrator
Solid and Hazardous Waste Section

RWM/CD/s
Enclosure
cc: Richard Powell

AN OUTLINE OF DEFICIENCIES FOR THE PART B APPLICATION SUBMITTED BY:
International Solvent Recovery, Inc.
FLD 980 729 610, (Including the 1/13/83
and all previous submittals)

A-17 - The hazardous waste streams and handling codes do not have a 1 to 1 correspondence with the rest of this application. Specifically, corrections may be required on the Tables on pages 5, 23 (REV. 12/13/83), 108A (REV. 1/17/83) and 119. Additionally, the Tables on pages 64, 120 in the text and page 18 in the attached contingency plan do not list all the solvents which will be placed in tanks.

B-2 - The site specific information, including contours sufficient to show surface water flow, buildings, structures, sewers loading and unloading areas, run-off control systems and any other relevant features, should be submitted after construction.

C-1 - Laboratory and analytical results should be submitted before wastes are received at the facility.

C-2e - We do not feel that color, odor and physical state are adequate procedures to inspect or analyze wastes generated off-site to determine whether they match the identity of the wastes specified in the manifest. These procedures in conjunction with other chemical and physical methods including flash point, pH and specific gravity would be more suitable.

C-2f - See A-17.

D-1a - After operations begin the applicant should address waste type locations (i.e., sludges, ignitable liquids, chlorinated solvents, etc.). Page 106 incorrectly references Table 11.1. The correct reference should be Table 11.1A on page 108A and page 106A should be deleted.

D-1a(3) - As built, engineering drawings and specifications should be submitted for the secondary containment structure, the storage building, curbs, diking and ramps.

D-1a(3)(a) - Prior to installation, the applicant should demonstrate that the epoxy sealent for seams in the containment area is compatible with the hazardous wastes.

D-1a(3)(d) - The applicant should evaluate the potential for run-on using the rain fall data provided in the text and the site contours (after construction) and demonstrate that there will be sufficient excess containment capacity to contain any run-on that will enter the storage building.

D-2a - As built, engineering drawings and specifications, including tank tie downs (if required) should be submitted to demonstrate that all federal, state and local building codes have been satified. Documentation should be included indicating that all hazardous waste storage tanks will meet the appropriate Underwriters Laboratory, Inc., standards for flamable and combustable liquids and American Petroleum Institute Standards for non-flammable liquids.

D-2c - Piping specifications should be included.

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 (if any), 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 prevent, detect, or respond to environmental or human health hazards.

F-2a(1) - See comment F-2a. Needs to be in a schedule format with each type of problem addressed.

F-2a(2) - See comment F-2a. Needs to be addressed in an overall schedule where all items are addressed. The alarm systems should be inspected on a daily basis through usage.

F-2b - See comment F-2a.

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.

F-2b(2) - See comment F-2a. All items should be included in a schedule. The test procedure for tank shell thickness should be conducted according to the Ultrasonic Method (ASME Boiler and Pressure Vessel Code, Section V, "Nondestructive Examination", Article 5) or equivalent.

F-2c - See comment F-2a. Does not address remedial actions for all types of problems included in the inspection logs.

F-2d - The date and nature of repairs must be included in the inspection log.

F-5c - Since the building dimensions have changed, the applicant must demonstrate that containers of ignitable waste are located at least 15 meters from the facility's property line.

Part G - Upon completion of construction but prior to operation the contingency plan should be amended to include the following items and information:

G-1 - The facility owner or operator's name and a 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) ofthe attached contingency plan should be resolved, designating a permanent emergency coordinator.

G-7 - The specific rally points in the event of evacuation should be included.

G-4h - An example of the post-emergency equipment checklist should be included.

G-6 - Copies of the contingency plan must be submitted to all appropriate agencies including local hospitals.

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 programs:

H-1b - Training content, frequency and techniques.

H-1c - Include a position description for a training director or incorporate it into one of the existing descriptions; in addition, an alternate emergency coordinator needs to be designated.

H-1a - The employee's name in the format of the job description should be included.

H-1d - Include the relevance of training to a position description.

H-1e - Document that emergency response training has been successfully completed demonstrating employee competency in procedures, equipment, and systems.