

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. #FLD980729610

- B-1 - Specific industries served is not addressed.
- B-2 - Information should be submitted including all checklist items based on actual design and layout of the facility. This cannot be properly evaluated until the company decides how the facility will be constructed.
- B-3b - Should include an FIA map or equivalent map to indicate flood plain.
- B-3b(1)B-3b(2) - Must be addressed based on B-3b, above.
- B-4 - Traffic patterns, controls, access roads, road surfacing ,and load bearing capacities are not addressed.
- C-1 - Specific waste streams are not included. Waste specific information must be included to properly evaluate the remaining sections of the application.
- C-1a - Not addressed (see C-1).
- C-1b - Not addressed (see C-1).
- C-2a - Rationale is not given for the parameters chosen. Parameters chosen are not sufficient for proper management.
- C-2b - Test methods are not referenced.
- C-2c - Plan must identify specific sampling methods for each type of shipment (sampling containers, sampling tanks).
- C-2d - Need to specify frequency and criteria for sampling incoming loads.
- C-2e - See C-2d, above. Generator representative sampling methods should be included.
- C-2f - Specific flash point tests should be referenced. There is a contradiction on pp 5 and 12 regarding handling of reactive waste.
- D-1a(1) - 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.

- D-1a(2) - 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).
- D-1a(3) - 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 a leakage...unless the containers are elevated or in some other manner are protected from contact with accumulated liquids.
- D-1a(3)(a) - Is not included.
- D-1a(3)(b) - Drawing contradicts the narrative as to east to west slope. Should be included in more specific engineering drawings. Specific handling practices should be included.
- D-1a(3)(c) - Calculations given are incorrect. The other items of this section cannot be evaluated without final engineering drawings and calculations. Storm intensity data is not given.
- D-1a(3)(d) - All items should be included in the engineering drawings with calculations and narrative incorporated into the final site design.
- D-1a(4) - Specific details and engineering evaluations are not given.
- D-2 - 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.
- F-1a(2)(b) - 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.
- F-1a(3) - 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.
- F-2a - Not addressed.
- F-2a(1) - All of the potential problems have not been addressed (see F-2b(1), F-2b(2)).
- F-2a(2) - Incomplete based on F-2b(1), F-2b(2).
- F-2b(1) - This section does not address inspections of the mobile tank and the integrity of the containment system.

- F-2b(2) - The inspection schedule should be revised to address all of the checklist items for the specific tanks to be installed at the facility.
- F-2c - The inspection schedule must describe the procedure for taking remedial action when an inspection reveals a problem.
- F-2d - A date and time, inspector's name, the observations made, and the nature of repairs need to be included on all inspection logs.
- F-3a(3) - Decontamination equipment is not addressed.
- F-3a(4) - Maps and narrative don't agree on fire hydrants and extinguishers.
- F-4 - Prevention of the contamination of the water supplies and the mitigation of effects of equipment failure and power outages have not been addressed.
- F-5a - Grounding of drums during pumping and pump specifications with respect to sparking have not been addressed.
- F-5d - 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.
- F-5f - The applicant does not address incompatible wastes in tanks.
- G-1 - 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.
- G-2 - 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.
- G-3 - Criteria for implementing the contingency plan in a spill has not been addressed.
- G-4a - FDER phone number is incorrect.
- G-4c - 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.
- G-4d - There is no indication that the emergency coordinator is notified for spills; explosions have not been addressed.
- G-4e - The procedures for the removal and isolating of containers have not been described.

- G-4f - 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.
- G-4j - Tank repairs are not addressed.
- G-5 - Only two of the three fire hydrants and only eight of nine fire extinguishers are located on the site plan. The equipment listed on p. 39 is not given a location; there are no first aid and medical supplies mentioned; emergency communication or alarm systems have not been addressed.
- G-6 - 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.
- G-7 - Evacuation is not adequately addressed.
- H-1 - Does not show training will be designed to meet job tasks.
- H-1a - Job duties and descriptions need to be supplied with each job title.
- H-1b - The type of training that each employee will receive and the frequency in which the employee will be receiving training has not been included.
- H-1c - A demonstration that the program is directed by a person trained in hazardous waste management has not been included.
- H-1e(1) - Documentation that adequate training for the procedures for the use, inspection, repair and replacement of facility emergency and monitoring equipment has not been addressed.
- H-1e(2), H-1e(3), H-1e(5) - Training program outline must include key parameters for waste feed cutoffs, communication or alarm systems and response to groundwater contamination.
- H-2 - There is no indication that training will be successfully completed by facility personnel within six months of their employment.
- I-1c - 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.
- I-1d - There is no demonstration that decontamination has been effective.
- I-1d(1) - 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.

- I-1d(2) - There is no verification of decontamination. Maximum inventory of wastes in tanks should be included.
- I-1e - The inspection schedule has not been addressed.
- I-4 - The maximum inventory of the drums and tanks has to be included in the disposal costs.
- J - Is not included.
- K - The certification by the professional engineer on all engineering drawings is not addressed.