

## Thursby, Kim

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**From:** Aishah Jones <ajones@trihydro.com>  
**Sent:** Tuesday, July 10, 2018 1:49 PM  
**To:** Kothur, Bheem; Glorioso, Vinnie  
**Cc:** Thursby, Kim  
**Subject:** RE: 07-03-18 First Request for Additional Information (RAI) Hillsborough County – Hazardous Waste; Facility Name: Heritage Crystal-Clean, LLC; Facility ID: FLD 065 680 613; Current Permit Number:30676-009-HO; DEP Application Number: 30676-10-HO

Hi Bheem,

Thank you for the reminder. We have received the Epost correspondence and are addressing the comments. We anticipate submitting a response early next week. Thank you much.

Very respectfully,

Aishah Jones  
Project Scientist



OUR SAFETY IS MY RESPONSIBILITY

2702 E. Kemper Road  
Cincinnati, Ohio 45241  
(513) 429-7461 (direct)  
(334)421-9213 (cell phone)  
(513) 771-0348 (fax)  
[ajones@trihydro.com](mailto:ajones@trihydro.com)

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**From:** Kothur, Bheem [mailto:Bheem.Kothur@FloridaDEP.gov]  
**Sent:** Tuesday, July 10, 2018 1:42 PM  
**To:** Aishah Jones <ajones@trihydro.com>; Glorioso, Vinnie <Vinnie.Glorioso@Crystal-Clean.com>  
**Cc:** Thursby, Kim <Kim.Thursby@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>  
**Subject:** FW: 07-03-18 First Request for Additional Information (RAI) Hillsborough County – Hazardous Waste; Facility Name: Heritage Crystal-Clean, LLC; Facility ID: FLD 065 680 613; Current Permit Number:30676-009-HO; DEP Application Number: 30676-10-HO

Hi Aisha or Vinne,

Please acknowledge, that you have received the Epost and cc to me, ASAP.

Thanks,

Bheem

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**From:** Outley, Debra **On Behalf Of** Epost HWRS

**Sent:** Tuesday, July 3, 2018 2:23 PM

**To:** 'Anita.Decina@Crystal-Clean.com' <[Anita.Decina@Crystal-Clean.com](mailto:Anita.Decina@Crystal-Clean.com)>

**Cc:** Baker, Bryan <[Bryan.Baker@dep.state.fl.us](mailto:Bryan.Baker@dep.state.fl.us)>; Walker, Kim (Waste) <[Kim.Walker@FloridaDEP.gov](mailto:Kim.Walker@FloridaDEP.gov)>; Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>; Ashwood, Janet <[Janet.Ashwood@dep.state.fl.us](mailto:Janet.Ashwood@dep.state.fl.us)>; 'bastek.brian@epa.gov' <[bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)>; Eldredge, Susan F. <[Susan.F.Eldredge@dep.state.fl.us](mailto:Susan.F.Eldredge@dep.state.fl.us)>; 'vinnie.glorioso@crystal-clean.com' <[vinnie.glorioso@crystal-clean.com](mailto:vinnie.glorioso@crystal-clean.com)>; Knauss, Elizabeth <[Elizabeth.Knauss@dep.state.fl.us](mailto:Elizabeth.Knauss@dep.state.fl.us)>; 'Merizalde.carlos@epa.gov' <[Merizalde.carlos@epa.gov](mailto:Merizalde.carlos@epa.gov)>; 'ajones@trihydro.com' <[ajones@trihydro.com](mailto:ajones@trihydro.com)>; 'ajones@trihydro.com' <[ajones@trihydro.com](mailto:ajones@trihydro.com)>; 'BPEkas@trihydro.com' <[BPEkas@trihydro.com](mailto:BPEkas@trihydro.com)>

**Subject:** 07-03-18 First Request for Additional Information (RAI) Hillsborough County – Hazardous Waste; Facility Name: Heritage Crystal-Clean, LLC; Facility ID: FLD 065 680 613; Current Permit Number:30676-009-HO; DEP Application Number: 30676-10-HO

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.  
Environmental Administrator  
Hazardous Waste Program & Permitting





# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

July 3, 2018

Heritage Crystal-Clean LLC, Plant City  
105 South Alexander Street  
Plant City, Florida, 33563  
[Anita.Decina@Crystal-Clean.com](mailto:Anita.Decina@Crystal-Clean.com)

Re: First Request for Additional Information (RAI)  
Hillsborough County – Hazardous Waste  
Facility Name: Heritage Crystal-Clean, LLC  
Facility ID: FLD 065 680 613  
Current Permit Number:30676-009-HO  
DEP Application Number: 30676-10-HO

Dear Ms. Anita Decina:

Thank you for your application for renewal permit for the above referenced Facility. The Department has assigned DEP Application No. 30676-10-HO to the application. A Department staff review of the application and supporting documentation submitted on June 26, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800(3), Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, that is by on or before July 30, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov). If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting

Heritage Crystal-Clean, LLC  
Page 2 of 5  
July 03, 2018

the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov), alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at 850-245-8781 or by e-mail at [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Baker", with a long horizontal flourish extending to the right.

*for*  
Bryan Baker, P.G., Administrator  
Hazardous Waste Program and Permitting

BB/bk

cc w/attachment:

Janet Ashwood, DEP Headquarters, [janet.ashwood@floridadep.gov](mailto:janet.ashwood@floridadep.gov)

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)

Susan Eldredge, DEP Headquarters, [susan.eldredge@floridadep.gov](mailto:susan.eldredge@floridadep.gov)

Vinnie Glorioso, Heritage Crystal-clean, LLC, [vinnie.glorioso@crystal-clean.com](mailto:vinnie.glorioso@crystal-clean.com)

Elizabeth Knauss, FDEP Southwest District, [Elizabeth.knauss@floridadep.gov](mailto:Elizabeth.knauss@floridadep.gov)

Carlos Merizalde, EPA Region 4, [merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)

Aishah Jones, Trihydro Corporation, [ajones@trihydro.com](mailto:ajones@trihydro.com)

Brad Pekas, Trihydro Corporation, [BPekas@trihydro.com](mailto:BPekas@trihydro.com)

### **Attachment: List of Requested Information**

Facility Name: Heritage Crystal-Clean, LLC  
Facility ID: FLD 065 680 613  
Current Permit Number: 30676-009-HO  
DEP Application Number: 30676-10-HO

#### Comments:

1. Part I, A, General Information, Page 1 and 2 of 8:
  - a. Item 1: The current permit expires on August 20, 2018 not December 31, 2018. Please review and revise as appropriate.
  - b. Item 2. Your revised application should be identified as Revision 1.
  - c. Item 10, and Item 11: Please complete the Operators and Facility Owners mailing address as appropriate. Also, according to the Hillsborough County Property appraiser web site and County Officials Records web site, the property is still owned by FCC Environmental, LLC. FCC is a Delaware corporation no longer registered to conduct business in Florida – the most recent Sunbiz record shows it to have officers in common with Heritage Crystal clean, however it does not appear to have merged with Heritage. The Owner certification (Page 7 of 8) is signed by Anita Decina, who was not listed as an officer of FCC as of the 2016 filing. Sunbiz shows a new filing in 2017 for FCC Environmental Services, LLC, a Delaware Corporation with a principal address in Texas. The company web site shows the old FCC Environmental logo, and the company purchased property in Lakeland in 2017. Please review, revise as appropriate and resubmit.
  - d. Item 13: If the land is owned and not leased, then the Land Owner's name and address is not applicable. Please review and complete as N/A.
  - e. Item 14: Please complete the name of the Professional Engineer, Registration No. and his/her mailing address.
2. Part I, B, Site Information, Page 2 of 8: The county name is "Hillsborough" not "Hillsboro"
  - a. Facility location: The latitude is missing. Please review and revise as appropriate.
  - b. UTM: The number is incorrect. It should be "3098871.8". Please review and revise.
3. Part I, C, Operating Information, Item C 2:
  - a. The facility does not manage electroplating waste EPA Wastes Codes F006 or F007.
  - b. Also, Items 3 through 10, pages 3 through 4 (of 8): Attachments "A through J" should be replaced by Attachments 1 through 10. Please review and revise as appropriate for consistency.
4. Attachment 1: Facility Description, Table 1-1, Summary of Aboveground Tanks
  - a. Page 1-5: Please add an asterisk (\*) at the bottom of the tank table and include the language: "Tank may be cleaned and used for alternate materials as needed.

- Tank labeling is changed when materials stored are changed.”
- b. Attachment 1, Page 1-1: Please clarify whether Heritage Crystal Clean’s purchase of FCC Environmental, LLC was a purchase of the corporation or an asset purchase.
  - c. Attachment 1, Section 1.5-Petroleum Contaminated Material, Page 1-3: The District has evidence that HCC recently accepted a load of caustic waste water, pH over 12.5, as “oily waste water” from an electroplating facility. Mixtures of used oil and hazardous waste water are not excluded from the definition of hazardous waste under 261.6(a)(4). Instead they are hazardous waste – See 40 CFR 279.21(a) and 279.10(b)(2). The permit application needs to show that HCC has adequate profiling procedures to ensure that hazardous wastes contaminated with small quantities of used oil are not accepted. At a minimum, pH needs to be screened on oily waste waters. The exclusion under 261.6(a)(4) applies to the used oil, not the water mixed with the used oil.
5. Attachment 6: Preparedness and Prevention Contingency Plan:
- a. Record Keeping and Reporting, Page 6-3: Please add “Suite 101” to FDEP physical address.
  - b. Emergency Contacts, Item 4, Page 6-4: According to our records, Vinnie Glorioso’s mobile phone number is “443-463-1598”, not “443-463-1589”.
6. Attachment 7: Unit Management Plan:
- a. Used Oil, Second Paragraph, Last Sentence, Page 7-1: Attachment is not included. Please review the sentence and include the attachment as appropriate.
  - b. Oily Waste, Summary of Aboveground Storage Tanks, Page 7-5, Table 7-1: Please review and correct the discrepancy between this table for the capacity of Tank T-630 and that listed in the table in the Spill Prevention, Control And countermeasures (SRCC) Plan, Table 3-Oil Capacities Survey-Stationary Tanks, Page 14: Please confirm the capacity of Tank T-630. Is the volume 630,000 gallons or 44,650 gallons?
7. Attachment 8, Closure Plan:
- a. Section 8.5, Closure of Container Storage Area, Table 8-1. Maximum Container Storage Capacity, Page 8-3: The closure cost estimate includes 20 “hazardous drums.” What is the source of these drums? Is HCC accepting CESQG hazardous waste? If so, why is there a 20-drum maximum listed? Please review and revise as appropriate. You may also need to revise your DEP Form 8700-12FL.
  - b. Cost Estimates, Second Paragraph, First Sentence, Page 8-5: The closure cost estimate should be “\$1,035,447.00” not “\$982,421”. Please review and revise as appropriate.
  - c. Used Oil Processing Facility Closing Cost Estimate Form 62-710.901(7): This form is dated 2013 and needs to be updated. Date of FDEP Approval information and Latitude/Longitude is not identified. Please review this Form in its entirety and resubmit.
8. Attachment 9, Employee Training, First Sentence: A schedule of HCC’s training is

included as part of this attachment. However, the attachment is not included. Please review and revise as appropriate.

9. Figures:

- a. Figure 3, Site Visit & Photo Log: Please identify the dark colored shapes and numbers (#1 through #21) in the legend on the map. Also, #10 is identified twice, and #11 is not identified. The tanks on the map should be identified. Please review and revise this figure as appropriate.

10. Appendix C, Fire Protection and Emergency Action Plan (FPEAP):

- a. Statement of Policy, Page 1-1: HCC Plant City Facility Manager's signature is missing. Please review and revise as appropriate.
- b. Appendix A of FPEAP, Evacuation Routes and Assembly Area: This figure is difficult to read. Please review and resubmit a legible copy.

11. Appendix D, Spill Prevention Control and Countermeasure (SPCC) Plan:

- a. Section 1.0, Emergency Telephone Numbers, page 2: FDEP's Tampa Office Phone Number is "813-470-5700", not "813-632-7600". Please revise.
- b. 2.0 Certification and amendments, Page 5: Signatures are missing on this Certification Page. Please complete and resubmit as appropriate.
- c. Table 3-Oil Capacities Survey-Stationary Tanks, Page 14: Installation date for Tank 630 is missing. Please review and revise as appropriate.

12. Appendix E, Secondary Containment Calculations: Secondary containment calculations for the Tank Farms (South Tank Farm and West Tank Farm) should be separated. Please revise and resubmit.

13. Please submit the facility site plan and tank table as word documents, so that they can be inserted into the draft renewal permit.

14. 8700-12FL – Florida Notification of Regulated Waste Activity, dated February 6, 2018 and DEP received dated February 7, 2018, Item 10, Waste Codes for Federally Regulated Hazardous Wastes, Page 2 of 5: Waste Codes, F001, F003, F005, F006, and F007 are not included in the Form 8700-12FL, whereas in renewal permit application, C. Operating Information, Item 2. List Applicable EPA Hazardous Waste Codes, Page 3 of 8, not included. Please review Form 8700-12FL, revise as appropriate and resubmit.

15. Please provide the capacity of the sumps providing secondary containment for the rail cars.