

Thursby, Kim

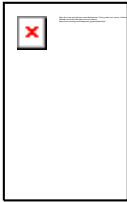
From: Ken Dean <Ken.Dean@usecology.com>
Sent: Friday, November 30, 2018 9:44 AM
To: Thursby, Kim
Subject: RE: US Ecology Tampa Inc; FLD 981 932 494;First Request for Additional Information (RAI)

Document received.

Thank you,

Ken Dean

EHS Compliance Specialist



ken.dean@usecology.com

p: 813.319.3433 | c: 813.748.4403 | f: 813.626.7451

7202 East Eighth Ave. Tampa, FL 33619

[USE Update on e-Manifest](#)

Emergency Response: 800.839.3975

Customer Service: 800.592.5489



From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us]

Sent: Friday, November 30, 2018 9:41 AM

To: Ken Dean <Ken.Dean@usecology.com>

Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'Merizalde.carlos@epa.gov' <Merizalde.carlos@epa.gov>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Kennedy, Shannon <Shannon.Kennedy@FloridaDEP.gov>; Knauss, Elizabeth <Elizabeth.Knauss@FloridaDEP.gov>; Morgan, Steve <Steve.Morgan@FloridaDEP.gov>; Gaskin, Nancy D. <Nancy.Gaskin@FloridaDEP.gov>; 'cpoole@pacskon.com' <cpoole@pacskon.com>; Igoe, Amber <amber.Igoe@dep.state.fl.us>

Subject: US Ecology Tampa Inc; FLD 981 932 494;First Request for Additional Information (RAI)

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. (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.

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

November 30, 2018

Ken Dean
US Ecology Tampa Inc.
7202 East 8th Avenue
Tampa, Florida 33619
Ken.dean@usecology.com

Re: First Request for Additional Information (RAI)
Hillsborough County – Hazardous Waste
Facility Name: US Ecology Tampa Inc
Facility ID: FLD 981 932 494
DEP Application No.: Hazardous Waste 34875-013-HO, Solid Waste 34875-SO-014

Dear Mr. Dean :

Thank you for your application for operating for the above referenced Facility. The Department has assigned DEP Application No. Hazardous Waste 34875-013-HO, Solid Waste 34875-SO-014 to the application. A Department staff review of the application and supporting documentation including two of the three volumes and renewal fee was submitted on October 4, 2018 and the remaining Volume submitted on October 15, 2018 indicates the application is incomplete. Pursuant to the provisions of 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 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, with a copy to amber.igoe@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>. After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to amber.igoe@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Amber Igoe by telephone at 850-245-8783 or by e-mail at amber.igoe@floridadep.gov.

Sincerely,



Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

cc:

Brian Bastek, USEPA Region 4 – bastek.brian@epa.gov
Carlos Merizalde, EPA Region 4 – merizalde.carlos@epa.gov
Dawn Cinquino, DEP Headquarters – dawn.cinquino@floridadep.gov
Shannon Kennedy, DEP Southwest District – Shannon.kennedy@foridadep.gov
Beth Knauss, DEP Southwest District – elizabeth.knauss@floridadep.gov
Steve Morgan, DEP Southwest District – steve.morgan@floridadep.gov
Nancy Gaskin, DEP Southwest District – Nancy.gaskin@floridadep.gov
Christopher Poole, PACSON – cpoole@pacson.com

Attached: List of Requested Information

Attachment: List of Requested Information

Facility Name: US Ecology Tampa Inc
Facility ID: FLD 981 932 494
DEP Application No.: Hazardous Waste 34875-013-HO, Solid Waste 34875-SO-014

1. Your facility is subject to the siting criteria in Chapter 403 Section 7211. Your request is considered a “substantial modification” as the following Hazardous Waste modifications are being requested:
 - a. The permit indicates that the max quantity of waste received at the facility that remains unloaded shall not exceed 10,000 gallons at any one time. An increase in inbound capacity from 10,000 to 20,000 gallons is requested. Material disposition has not changed, but volume of totes received at facility has increased significantly.
 - b. The permit allows for the storage of 4,400 gallons/80 drums of HW in the WPB for up to 365 days. An increase in capacity to 5,000 gallons is requested since a full trailer capacity is typically 4,800 gallons.

According to Chapter 403 Section 7211, “Substantial modification” includes: any physical change in, change in the operations of, or addition to a facility which could increase the potential offsite impact, or risk of impact, from a release at that facility; and any change in permit conditions which is reasonably expected to lead to greater potential impacts or risks of impacts, from a release at that facility. An Offsite Consequence Analysis was conducted in 2016. The modeling report looked at the release of four toxic chemicals: ammonia, hydrofluoric acid, hydrochloric acid and nitric acid and concluded that the maximum distance for a chemical release would be 1050 feet.

Please update the 2016 Offsite Consequence Analysis for the requested changes. Please provide further explanation as to why the four chemicals selected for the analysis are representative of the wastes managed by USE. Please provide a discussion of reactive chemicals in your analysis. The updated analysis should also include a discussion on the magazine and how that will be protective for any worse case scenario if an explosion were to occur.

Volume 1

2. DEP Form 62-730.900(2)(c): In Question 2, as some of the items were answered as “Yes” in Question 1, please provide a description of the wastes that were stored, treated or disposed of in at each unit on a separate sheet(s) of paper.
3. Page 20, Recommendation 4: It was recommended that, “Confirmatory analysis is required post treatment on all batches of hazardous waste that are stabilized, in the on-ground hazardous waste treatment tank, to ensure the treatment process has met the UTS/LDR requirements. USE requests that confirmatory analysis requirement, for only D002 wastes with No UHCs, be reduced to the initial confirmatory analysis and

subsequent annual confirmatory analysis for each batch treated. Approval of this reduction in the analysis requirement will allow USE to increase their processing throughput and subsequent holding times allowing for the treated material to be disposed more efficiently.” Please provide additional information on the following so that the Department can evaluate your request:

- a. How is it initially determined that D002 waste codes do not contain UHCs?
 - b. Based upon your experience, provide the Department with examples of D002 wastes that did not contain UHCs. Include process for determining that there were no UHCs (e.g., lab data).
 - c. If there is a change in the process that generates a D002 waste code, describe the process to determine if there are any UHCs present due to the change.
 - d. Provide additional details on the process flow of the D002 waste through the Facility.
 - e. As corrosive wastes can change the leachability of other wastes mixed into the load please describe why this is not a concern in the treatment process to meet UTS/LDR requirements.
4. Page 20, Recommendation 5: As the bays involved can store ignitable material, please provide confirmation that the proposed change is in accordance with fire code. Please also describe how the wastes will be managed during construction.
 5. Page 23: Recontainerization – Please be specific as to how containers will be repackaged in accordance with USDOT requirements for lab pack with inner containers holding free liquids. The most recent inspection found that a “loose pack” of makeup was packaged without absorbent.
 6. Page 25: Please provide a description as to how wastes to be recontainerized will be managed.
 7. Page 25 (2.3.5): During the last inspection there was an issue with high pH liquid condensing on the roll off cover and leaking onto the pavement. The stabilization process is exothermic. This issue was temporarily fixed by an agreement that the roll off would be staged in pop-up containment while it cooled. Please indicate if this is still the current process or there is a different process in place.
 8. Page 27 (2.4.8) Please ensure that treatment of characteristic wastes is performed without any organic underlying hazardous constituents or cyanide
 9. Page 29, Section 2.4.7: Please provide further details on the reactives magazine.
 - a. What type of waste is stored there? Please include the corresponding waste code.
 - b. For what time duration is the waste stored?
 - c. Is the waste stored in its original container?
 - d. How is the waste handled?
 10. Page 29, Section 2.4.8:
 - a. Where will the activity of tanker unloading occur?
 - b. What types of wastes be containerized e.g. oil or oily wastes, hazardous wastes)?

- c. Will liquid wastes be containerized?
 - d. How will compatibility be confirmed prior to pumping?
11. Page 30, Section 2.4.10: As household hazardous waste is exempt from DOT requirements, once repackaged, the Department does not have the required information to make a determination whether the items came from a household or a retail outlet once packaged. Please provide the specific requirements that US Ecology has to comply with all RCRA and DOT requirements for packages of mixed HHW and commercial waste.
12. Page 40, Section 4.3.1:
- a. The facility is not currently authorized for fuel blending. Based on the information in Section 4.3.1 and the earlier statements regarding drum consolidation is fuel blending occur at the facility?
 - b. Please elaborate as this indicates that the waste is okay for pH but fails the steel corrosion test. Also, there are corrosive non aqueous liquids that should not be treated on site, like ethanalamines.
13. Page 43, Section 4.5.1: If the finger printing analysis is used to screen used oil for halogen content a test method should be specified e.g. dexsil, XRF or other EPA approved method.
14. Page 45, Section 4.5.2:
- a. What type of metals are typically scanned (e.g. TC metals, UHC metals etc.)?
 - b. What is the method detection limit for detecting UHCs?
15. Page 45, Section 4.6: The text indicates that a minimum of 10 a minimum of 10% of the containers of each waste stream will be selected and opened for fingerprint examination upon acceptance. Will repackaging and consolidation of waste occur in other containers?
16. Page 47, Section 4.7: This is the section that should identify how waste to be consolidated is examined prior to consolidation, since the container may not have been opened and examined prior to consolidation.
17. Page 73, Section 7.2: This section should be amended to reflect any new e-manifesting procedures.
18. Page 75, Section 7.7: How will US Ecology track incoming waste from VSQGs that the generator brings to the facility? The DEP District office has not received any unmanifested waste reports for this material.
19. Page 95, Section 10.5.3: Please explain in greater detail the calculations provided in the table at the top of the page. For ISCA Area #1 and ISCA Area #3, why are the containment volumes divided by 2 instead of multiplied? Is the width for ISCA Area #3 correct? The Department understood that Areas #1 and #3 were of similar dimensions. Please review and submit either an explanation of the dimensions and calculations, or a revised table. Notwithstanding the calculations provided, as the

Department believes the calculations may underestimate the capacity, it appears that the secondary containment is more than sufficient for this facility.

20. Page 109: Closures must comply with USDOT regulations on any container over 26 gallons managing waste with 500 ppm volatile organic content
21. Page 100: The silver standard that is being quoted is incorrect-the alternate soil treatment standard is being quoted not the standard for generated wastes. Also, the facility is prohibited from meeting the treatment standards by dilution per 40 CFR 268.3.
22. Page 108, Section 12.3: The Department agrees that the facility has no Subpart AA processes; however, the claim that pumps, valves and compressors are exempt if used for less than 300 hours per year is not correct. The items may not be in contact with waste with more than 10% organics by weight, and must be identified per 264.1064(g)(6). How is use of the paint can crusher be tracked for compliance with this regulation?
23. Volume 2 - Standard Operating Procedure (OPS-OP-071-FLA), Section 4.2.2, Page 5 of 9: The text indicates that once containers have been staged, they must not exceed 4,400 gallons. Is 4,400 gallons the correct volume?
24. Volume 2 - Standard Operating Procedure (OPS-OP-071-FLA), Section 5.7, Page 7 of 9: The paragraph is highlighted, please clarify.