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Lutz, FL 33549

April 6, 2019

Ms. Amber Igoe, CHMM
Environmental Consultant
Hazardous Waste Program and Permitting
2600 Blair Stone Rd MS 4560
Florida Department of Environmental Protection
Tallahassee, FL 32399

**Subject: Response to First Request for Additional Information
US Ecology Tampa, Inc.
7202 East 8th Avenue, Tampa, FL 33619
Permit Application No. 34875-013-HO
PACSCON Project No. 2018-1133**

Dear Ms. Igoe:

Pursuant to the Department's First Request for Additional Information (RAI), dated November 30, 2018, following please find detailed responses to the information requested in your correspondence:

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.

Response: Pursuant to our e-mail correspondence, dated March 1, 2019, US Ecology has made the decision to formally rescind the request for an additional 10,000 gallons of

capacity in the inbound staging area and will continue forward with the currently permitted capacity for this area of 10,000 gallons. The permit application and supporting documentation has been revised to remove any references to the initially requested 10,000 gallons of additional storage capacity in the inbound staging area. The requested increase in hazardous waste storage capacity on the Waste Processing Building (WPB) floor from 4,400 gallons to 4,950 gallons has been addressed accordingly from an offsite consequence analysis perspective.

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.

Response: The 2016 Offsite Consequence Analysis (OCA) has been updated as requested by the Department even though the inputs and parameters to the model are consistent with the past model and the increase in surface area resulting from the construction of the new proposed blind sump within the WPB is considered negligible. The updated OCA modeling report is included in its entirety in Section 13.0 of Volume 1 of 3. Consistent with the 2016 OCA, ammonia, hydrofluoric acid, hydrochloric acid and nitric acid are considered the most toxic chemical compounds from a vapor pressure perspective managed (treated) at the USE facility. They would result in the greatest potential offsite impact from the WPB to the closest offsite sensitive receptor, the Orient Road Jail, if a worst-case release were to occur and thus are appropriate for the OCA modeling completed. The Armag Corporation type 2 reactive magazine deployed in the WPB has constructed to meet or exceed ATF specifications to isolate materials in the case of an explosion. As such, there would be no offsite consequence from an explosion in the reactive magazine.

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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.

Response: *References to where in the application text the container storage area, transfer station, waste recycling operations and treatment tank are discussed are provided in a text box directly below question 2.*

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?

Response: *This is confirmed via the material's acceptance and approval process, the waste analysis plan (WAP), and generator knowledge. Safety data sheets (SDS) and/or laboratory analytical reports are supplied by generator if available.*

- 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).

Response: *Virgin material SDSs and/or laboratory analytical reports are provided by generator through the facility's waste acceptance and approval process.*

- 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.

Response: *Any generator process changes are determined through the facility's annual recertification process. It should be noted that the facility's permit allows waste profile approval ever two years, but USE completes this process annually as an internal best management practice (BMP).*

- d. Provide additional details on the process flow of the D002 waste through the Facility.

Response: *Only virgin product or bulk process streams (e.g., vac trucks, tankers, etc.) of D002 waste are accepted at the facility through the standard waste acceptance and approval process.*



- 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.

Response: As discussed in item d. above, virgin product (containers or bulk) based on SDSs or bulk process streams must be confirmed through laboratory analysis. Further, as discussed above, waste profiles are recertified annually.

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.

Response: A building permit will be required to complete the proposed change. When the building permit is submitted, all applicable departments having review authority over the permit will be engaged through the review process, including the City of Tampa Fire Department. Further, based on discussions with fire door vendors, the fire rating standard for doors are provided in time increments of 20 minutes, 45 minutes, and 1-hour. USE plans to use replacement doors with the maximum fire rating of 1-hour. The wastes will be managed as they currently area during the proposed construction. The wastes will be moved to the opposite side of the bay to avoid potential construction impacts. The compatibility of the wastes will be confirmed prior to temporary relocation and storage in the bay.

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.

Response: The facility will ensure that lab pack containers will be repackaged in accordance with the requirements of USDOT 49 CFR 173.12(b). USE will ensure through training that the chemical process operators completing the repackaging activities are aware of the specific requirements of this regulatory section. Training will be documented through USE normal internal training processes.

6. Page 25: Please provide a description as to how wastes to be recontainerized will be managed.

Response: The same applicable management practices as discussed for the Container Storage Building (CSB) in section 2.3.1 will apply to the management of recontainerized material handled in the WPB.

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.

Response: Yes, pop-up containments will be used as a standard BMP to prevent any potential leaking while roll offs are staged and cooled post treatment. The roll offs will be moved from the temporary pop-up containments after it is determined that the material has cooled and placed elsewhere within SWMU 20 pending the receipt of confirmatory analysis and/or offsite disposal.

8. Page 27 (2.4.8) Please ensure that treatment of characteristic wastes is performed without any organic underlying hazardous constituents or cyanide.

Response: We believe that the correct section callout for this comment is 2.4.5 versus 2.4.8. The facility is not permitted to treat F-, P-, or U-listed material or organic UHCs. The disposition of the material to be treated is confirmed through the facility's waste acceptance and approval process.

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.

Response: DOT 1.4 explosive material, e.g. road flares, marine flares, and small munitions. D001, D003, D005 and D008 are most common waste codes managed in the reactives magazine.

- b. For what time duration is the waste stored?

Response: The accumulation period can be up to 1-year.

- c. Is the waste stored in its original container?

Response: Waste is shipped to the USE facility in USDOT approved containers.

- d. How is the waste handled?

Response: The waste is typically reconsolidated into larger containers for more efficient accumulation and offsite disposal.

10. Page 29, Section 2.4.8: Change section heading to Tanker Loading/Unloading.
a. Where will the activity of tanker unloading occur?



Response: The heading of this section has been changed to "Tanker Loading/Unloading." This activity can occur at either the CSB or WPB depending on the type of material received.

b. What types of wastes be containerized e.g. oil or oily wastes, hazardous wastes)?

Response: Any type of material that the facility is permitted to accept.

c. Will liquid wastes be containerized?

Response: If the material can be treated onsite it will be containerized in drums or totes and/or pumped directly in to the treatment tank within the WPB.

d. How will compatibility be confirmed prior to pumping?

Response: Compatibility will be determined through the facility waste acceptance and approval process if the waste is to be containerized. If there is no waste in the tank, the liquid will be pumped directly into the tank following waste acceptance. If wastes are already present in the treatment tank, an onsite compatibility test will be performed prior to offloading any additional waste into the treatment tank.

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.

Response: Upon receipt at the facility, any waste is entered into the facility waste tracking system. The origination source of any waste accepted at the facility can be readily determined through the waste tracking system and will determine the appropriate regulatory requirements under which the waste is managed.

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?

Response: As discussed during the Department's January 17, 2019 facility visit, fuel blending is not performed at the facility, but wastes maybe disposed of offsite at a fuel blending 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 ethanolamines.

Response: Corrosives that are received at the facility are fingerprinted per the WAP. Both Aqueous and Non-aqueous materials are accepted and fingerprinted with pH meter for QA/QC to verify that they match the profile form parameters that was submitted by the generator of the waste. If any discrepancies are discovered during the fingerprint process they are noted and a resolution with the generator is reached if possible. Once the material has been cleared and/or discrepancy resolved the material will be placed into storage or set up for processing in either the hazardous treatment tank or the non-hazardous solidification tank.

13. Page 43, Section 4.5.1: If the fingerprinting 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.

Response: A direct reading halogen detector is used for the initial screening of used oil. If halogen is detected, an industry standard quantitative colorimetric test method such as a Dexsil® test kit is used to confirm halogen presence in used oil.

14. Page 45, Section 4.5.2:

- a. What type of metals are typically scanned (e.g. TC metals, UHC metals etc.)?

Response: A metals scan may be used to determine TC and/or UHC metals.

- b. What is the method detection limit for detecting UHCs?

Response: The method detection limit (MDL) will be determined based on the analytical method used and the laboratory's internal QA/QC program.

15. Page 45, Section 4.6: The text indicates that 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?

Response: Yes, repackaging and consolidation of waste may occur in other containers provided the waste materials being repackaged or consolidated are compatible.

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.



Response: *As necessary, a compatibility test will be performed on waste materials prior to consolidation. Refer to the response to item 10.d. above for compatibility testing requirements.*

17. Page 73, Section 7.2: This section should be amended to reflect any new e-manifesting procedures.

Response: *As discussed above the facility uses an internal waste tracking system to enter material details upon waste acceptance. These details are then transferred electronically into the USEPA e-manifesting system/database.*

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.

Response: *All waste received at the facility is entered into the waste tracking system. Reports for any such material will be provided to the District office as identified. Application section references have been changed VSQGs versus CESQGs.*

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.

Response: *The nomenclature for the three areas comprising the ISCA has been changed to A, B, and C moving from south to north across this area (see Figure 14). The area and volume calculations are correct for these areas as presented in REV 00 of the application. In the REV 01 version of the application, these area and volume calculations have been moved around in the referenced table as necessary to make sure that they correspond correctly with ISCA areas A, B, and C. Regarding the division by 2 of the containment volumes calculated for the former ICSCA Areas #1 and #3, these values have been halved to account for the presence and pitch of the loading ramps in both of these areas and is considered to be conservative. We concur with the Department's assessment 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



Response: USE will ensure that containers have secured closure devices (drum lid, tanker lid or equivalent) in place and that they are closed when materials are not being loaded to the containers in accordance with USDOT regulations.

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.

Response: Footnote 5 has been removed from Table 11-1 and the correct silver standard has been provided in this table, as necessary.

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 being tracked for compliance with this regulation?

Response: The exemption language referenced in this section has been removed. Hours will be tracked using a spreadsheet for compliance with this regulation (please see attached).

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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?

Response: The referenced capacity will be changed once the permit is approved and issued by the Department. The changing of the storage capacity prior to the Department's approval of the renewed permit is contrary to the facilities ISO certification.

24. Volume 2 - Standard Operating Procedure (OPS-OP-071-FLA), Section 5.7, Page 7 of 9: The paragraph is highlighted, please clarify.

Response: The highlighted text is an oversight and has been removed.



We sincerely appreciate your continued assistance and guidance with this permit renewal process. Please do not hesitate to contact me at (813) 563-0440, extension 701, or via e-mail at cpoole@pacskon.com, or Ken Dean at (813) 319-3433, or via e-mail at ken.dean@usecology.com, with any questions or comments.

Sincerely,

PACSCON



Christopher B. Poole, PG, CPG
President & COO | Principal

Attachments: Paint Can Crusher Usage Tracking Log

Electronic

Enclosures: USE Tampa Consolidated Permit Vol 1 of 3_REV 01_2019-04-06
USE Tampa Consolidated Permit Vol 2 of 3_REV 01_2019-04-06

ec: Don Locke – USE Tampa
Ken Dean – USE Tampa
David Tedford, P.E. – PACSCON





Paint Can Crusher Usage Tracking Log

Month

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Date _____	Date _____	Date _____	Date _____	Date _____	Date _____
Shift _____	Shift _____	Shift _____	Shift _____	Shift _____	Shift _____
Start _____	Start _____	Start _____	Start _____	Start _____	Start _____
End _____	End _____	End _____	End _____	End _____	End _____
Initials _____	Initials _____	Initials _____	Initials _____	Initials _____	Initials _____
Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00
Date _____	Date _____	Date _____	Date _____	Date _____	Date _____
Shift _____	Shift _____	Shift _____	Shift _____	Shift _____	Shift _____
Start _____	Start _____	Start _____	Start _____	Start _____	Start _____
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Initials _____	Initials _____	Initials _____	Initials _____	Initials _____	Initials _____
Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00
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Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00
Date _____	Date _____	Date _____	Date _____	Date _____	Date _____
Shift _____	Shift _____	Shift _____	Shift _____	Shift _____	Shift _____
Start _____	Start _____	Start _____	Start _____	Start _____	Start _____
End _____	End _____	End _____	End _____	End _____	End _____
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Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00
Date _____	Date _____	Date _____	Date _____	Date _____	Date _____
Shift _____	Shift _____	Shift _____	Shift _____	Shift _____	Shift _____
Start _____	Start _____	Start _____	Start _____	Start _____	Start _____
End _____	End _____	End _____	End _____	End _____	End _____
Initials _____	Initials _____	Initials _____	Initials _____	Initials _____	Initials _____
Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00	Total Time 0:00
Total Time/Month					0:00