



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

February 1, 2022

CERTIFIED MAIL

Mr. Randy Sparks, Regulatory Manager
Systech Environmental Corporation
2701 N. 145th East Avenue
Tulsa, Oklahoma 74116

Re: Systech Environmental Corporation
RCRA Hazardous Waste Permit Renewal Application
Permit Number: 000025452
EPA ID No. OKR000025452

Dear Mr. Sparks:

On February 5, 2021, the Land Protection Division of the Department of Environmental Quality (DEQ) received the above referenced permit renewal application dated February 4, 2021, for the renewal of the Systech Environmental Corporation (Systech) Operations Permit. In accordance with Oklahoma Administrative Code (OAC) 252:205-21-4(a)(2), the required application fee was received in the amount of \$5,000. In accordance with OAC 252:4-7-13(c) and (d), Systech provided DEQ with a draft notice of filing on February 4, 2021, and published the approved notice in The Claremore Daily Progress on March 7, 2021. The required affidavit of publication was submitted on March 17, 2021.

The renewal application was reviewed for administrative completeness in accordance with Title 40 of the Code of Federal Regulations (40 CFR) parts 264 and 270, the Oklahoma Hazardous Waste Management Act (27A O.S. §§ 2-7-101 *et seq.*), OAC 252:4 and OAC 252:205, and DEQ determined the application to be administratively complete on May 13, 2021. DEQ has reviewed the application for technical adequacy in accordance with the applicable rules and regulations, and the following deficiencies have been noted in the Systech application:

1. In Section C, Waste Analysis Plan, a Sheen Observation Procedure is included as Attachment C-4 that describes the visual inspection used to detect contaminated stormwater. Please provide an explanation and justification on why analytical samples will not be taken on the stormwater.
2. In Section I, Closure Plan and Financial Requirements, Subsection 5.0, Closure Cost Estimate, please clarify whether the closure cost estimate was based on the costs to the owner or operator of hiring a third party to close the facility. Third party costs must be incorporated into the cost estimate in accordance with 40 CFR 264.142(a)(2).



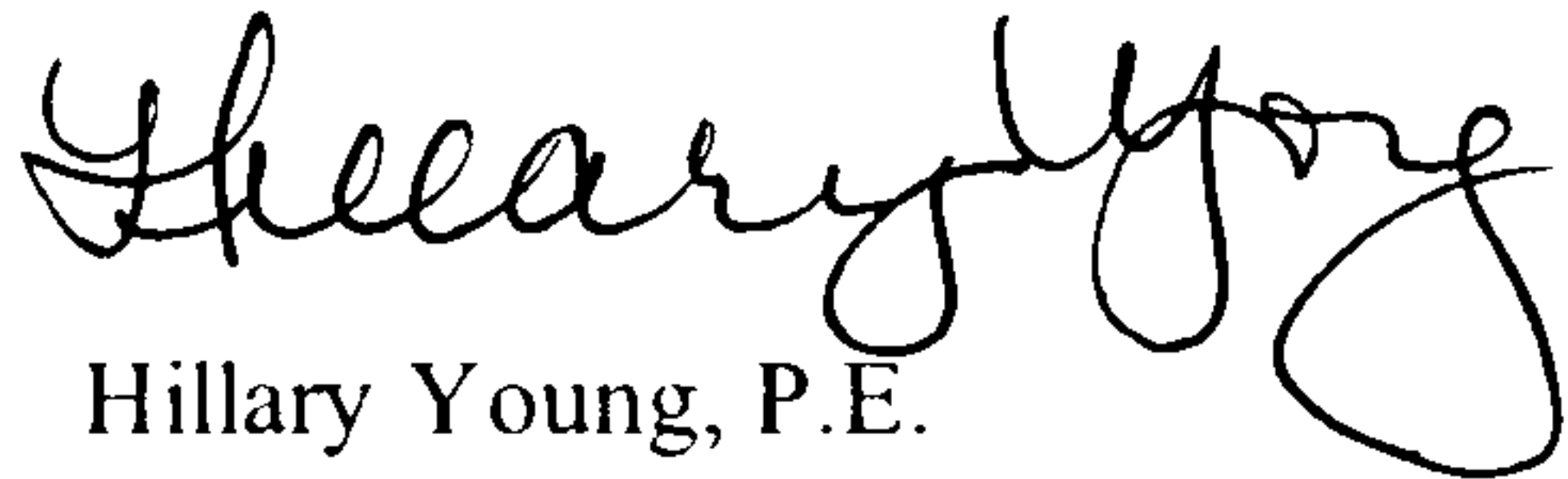
3. In Section I, Closure Plan and Financial Requirements, Subsection 5.0, Closure Cost Estimate, states, "Rinse water generated from the decontamination of tank systems and container storage areas will be shipped off-site to A Clean, South 25th West Avenue, Tulsa, OK [...]" The facility formerly known as A Clean Environment is now known as US Ecology Tulsa, Inc. Please update information on receiving facilities.
4. In Section I, Closure Plan and Financial Requirements, Attachment I-1, Closure Sampling and Analysis Plan, Section 2.0, Media to be Sampled and Analyzed, states, "Soil and rinse water samples will be analyzed for volatile organics according to Method 8240 [...]" Method 8240 has been replaced by Method 8260. Please ensure the most current EPA-approved Methods are used.
5. Section L, Air Emission Standards, Attachment L-3, Closed-Vent System and Control Device Operations and Maintenance Plan is dated April 2012 and contains outdated information. For example, in 3.1.1, Cement Kilns, it states, "Lafarge will demonstrate compliance with the DRE during the course of the Comprehensive Performance Test (CPT) required by the HWC MACT." The CPT should have already occurred, and Lafarge is not the correct name for the cement kiln. Please review the Plan and update as appropriate.
6. In Section B, Facility Description, Subsection 7.0 Legal Boundaries, Systech states that it owns the property where its operations are performed, and a copy of the deed is included in Attachment B-1. Attachment B-1 appears to be a legal description and not a copy of a deed. It states the permittee is Central Plains Cement Company, Tulsa Cement Plant LLC, Tulsa, Oklahoma and lists the permit number and EPA ID number for Tulsa Cement. Furthermore, Section M, Solid Waste Management Units, Subsection 1.0, Solid Waste Management Units, states, "The Systech facility is a ~1-acre area that is an active waste management facility." The legal description in Attachment B-1 concludes the legal description with "[...] tract of land containing 161,950 square feet or 3.718 acres more or less [...]" Please revise the legal description in Attachment B-1 so that it describes the Systech site, as appropriate.
7. Several figures in the application are listed as Confidential Information including Figure A-2 and some figures in Section D. Any claims of "Confidential Information" must be substantiated by a corresponding claim of confidentiality in accordance with OAC 252:4-1-5(d). Please substantiate these claims or delete them.
8. Section P, Application Review Checklists, is listed as Section O on the first cover page. Please update the cover page as appropriate.

Mr. Randy Sparks
February 1, 2022
Page 3

9. In Section H, Training Plan, there is no mention of the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) training. OSHA HAZWOPER training is required for all employees whose duties may require them to respond to a release or spill of hazardous waste or operate a hazardous waste treatment, storage, or disposal unit. Please update Section H as appropriate.

Please provide the above information to DEQ within thirty (30) days of your receipt of this letter. If you have any questions regarding this correspondence, please contact Brigette Haley of my staff at 405-702-5104.

Sincerely,

A handwritten signature in black ink, appearing to read "Hillary Young". The signature is written in a cursive, flowing style with a large loop at the end.

Hillary Young, P.E.
Chief Engineer
Land Protection Division

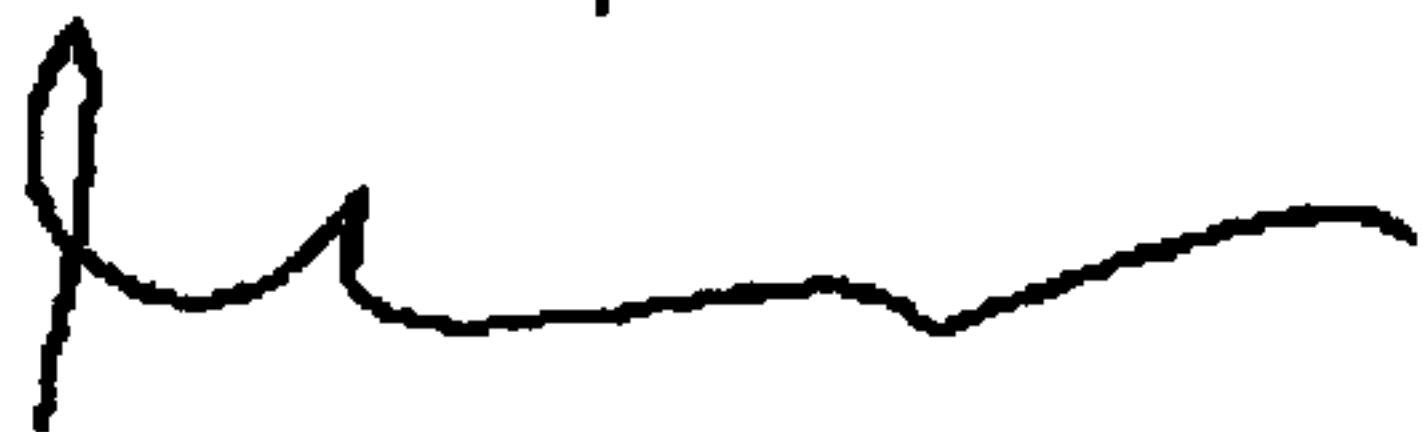
HY: BH

Date Produced: 02/14/2022

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 7960 5800 0072 37. Our records indicate that this item was delivered on 02/09/2022 at 11:35 a.m. in TULSA, OK 74115. The scanned image of the recipient information is provided below.

Signature of Recipient :


Greg Phillips

Address of Recipient :

2701 N 145TH EAST AVE
TULSA, OK 74116-1409

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

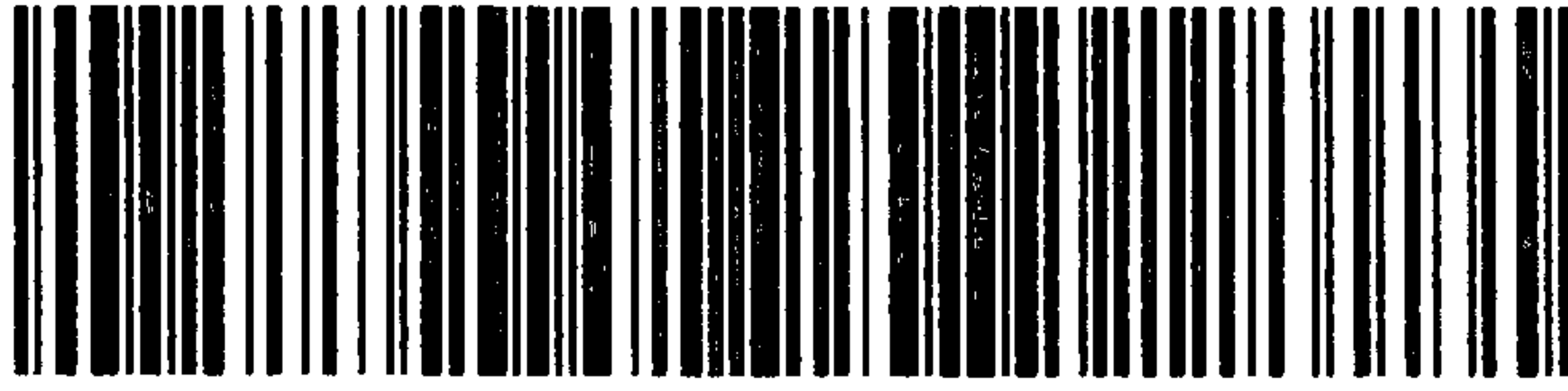
Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3205813.18642574

Oklahoma Department of Environmental Quality
Attention: Land Protection Division
707 N Robinson Ave
Oklahoma City Oklahoma 73101
LPD

USPS CERTIFIED MAIL



9214 8901 7960 5800 0072 37

MR RANDY SPARKS REGULATORY MANAGER
SYSTECH ENVIRONMENTAL CORPORATION
2701 N 145TH EAST AVE
TULSA OK 74116-1409

Brigette Haley
Michele Woods