

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Monday, March 12, 2007 8:47 AM
To: Epost HWRS
Subject: RE: Safety-Kleen Systems, Inc. Orange Park; FLD 980 847 214; Operating Permit 77130-HO-004

received

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Tue 3/6/2007 8:44 AM
To: Curtis, Jeff
Cc: pallas.jeff@epamail.epa.gov; Patel, Ashwin; jpeyton@coj.net; opclerk@townoforangepark.com; Harold.rutledge@co.clay.fl.us; heath_rauschenberger@fws.gov; maryannpoole@myfwc.com; Bahr, Tim; Griffin, John; Outlaw, Douglas; Kothur, Bheem
Subject: Safety-Kleen Systems, Inc. Orange Park; FLD 980 847 214; Operating Permit 77130-HO-004

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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. Contact www.adobe.com/products/acrobat/readstep2.html to download a free copy.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

3/19/2007



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 6, 2007

Sent Via Email

Jeff.Curtis@Safety-Kleen.com

Mr. Jeff Curtis
Environmental Health & Safety Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

SUBJECT: Safety-Kleen Systems, Inc. Orange Park; FLD 980 847 214;
Operating Permit 77130-HO-004; Duval County - Hazardous Waste

Dear Mr. Curtis:

The purpose of this letter is provide Notice of Intent to Issue a permit modification for your facility located at 161 Industrial Loop South, Orange Park, Duval County, Florida, specifically for changing the existing used ethylene glycol storage tank to a used oil storage tank and adding a 2,700 gallon polyethylene tank for used ethylene glycol storage. Please review the attached documents and ensure publication and broadcast within the time allotted.

If you have any questions or would like to discuss this matter, please contact John E. Griffin at (850) 245-8785.

Sincerely,

Tim J. Bahr, Administrator
Hazardous Waste Regulation

TJB/jeg

cc (with enclosures):

Jeff Pallas, EPA/Region 4, pallas.jeff@epamail.epa.gov
Ashwin B. Patel, DEP/Jacksonville, Ashwin.Patel@dep.state.fl.us
Mayor, City of Jacksonville, jpeyton@coj.net
Mayor, City of Orange Park, opclerk@townoforangepark.com
Chairman, Clay County Board of County Commissioners, Harold.rutledge@co.clay.fl.us
Heath Rauschenberger, U.S. Fish & Wildlife Service heath_rauschenberger@fws.gov
Mary Ann Poole, Florida Fish and Wildlife Conservation Commission maryannpoole@myfwc.com

"More Protection, Less Process"
www.dep.state.fl.us



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

FACT SHEET

March 6, 2007

Facility Name: Safety-Kleen Systems, Inc., Orange Park, Florida
EPA I.D. Number: FLD 980 847 214
Permit #: Operation Permit 77130-HO-004
Project: Permit Modification for Storage of Used Oil and Ethylene Glycol

1. This is a permit modification to change the existing used ethylene glycol storage tank to a used oil storage tank and to add a 2,700 gallon polyethylene tank to be used for storage of ethylene glycol at Safety-Kleen Systems, Inc.'s site at Orange Park, Florida.
2. The used oil storage tank is co-located in the containment for the hazardous waste spent solvent tank. The new polyethylene ethylene glycol storage tank is located in the return-fill station area.
3. Financial assurance for the facility has been provided as required.
4. There are no issues with this permit.

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In the Matter of an
Application for a Permit Modification by:

Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

*DEP File No.: FLD 980 847 214
Duval County*

INTENT TO ISSUE

The Florida Department of Environmental Protection (“the Department”) gives notice of its intent to issue a permit modification (copy enclosed) for the proposed project as detailed in the application specified above, for the reasons stated below.

On March 9, 2006, the applicant, Safety-Kleen Systems, Inc., applied to the Department and provided supplemental information on October 13, 2006 and November 29, 2006, for a permit modification to change the existing used ethylene glycol storage tank to a used oil storage tank and to add a 2,700 gallon polyethylene tank to be used for storage of ethylene glycol at Safety-Kleen Systems, Inc.’s site at Orange Park, Florida. The Department has permitting jurisdiction under Section 403.722, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-730. The project is not exempt from permitting procedures. The Department has determined that an operating permit modification is required for the proposed work. The Department intends to issue the permit modification with the conditions with the conditions included in the enclosed draft.

Pursuant to Sections 403.722 and 403.815, F.S. and Rule 62-730.292, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Newspaper Notice, and to broadcast over a local radio station the enclosed Radio Announcement. The notice shall be published one time only within 30 days of receipt of the Intent in the legal ad section of a daily, major newspaper of general circulation in the area affected. The newspaper must contain at least 25 percent of its words in the English language, be for sale to the public generally, be available to the public generally for the publication of official or other notices and customarily contain information of a public character or of interest or of value to the public. The newspaper must have been in existence for one year, unless no such newspaper exists in the affected area. (See Sections 50.011 and 50.031, F.S.). Where there is more than one daily newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Office of General Counsel of the Department at (850) 245-2242. The applicant shall provide proof of publication to the Department of Environmental Protection at 2600 Blair Stone Road, Mail Station #4560, Tallahassee, Florida 32399-2400; Attention:

Administrator, Hazardous Waste Regulation Section, within 14 days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification.

The Radio Announcement shall be broadcast one time only within 30 days on a licensed commercial radio station of sufficient power to be clearly received in the area that may be affected by the permit. **Broadcast of the notice shall occur between 8:00 a.m. and 10:00 p.m.** The applicant shall provide proof of broadcast to the Department of Environmental Protection, 2600 Blair Stone Road, Mail Station #4560, Tallahassee, Florida 32399-2400; Attention: Administrator, Hazardous Waste Regulation Section, within 14 days of the broadcast. Failure to broadcast the announcement and provide proof of the broadcast within the allotted time may result in the denial of the permit modification.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or all parties reach a written agreement on mediation as an alternative remedy under Section 120.573, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are explained in the enclosed Newspaper Notice apply to you, as applicant and Permittee. Your 45-day period for requesting an administrative hearing begins on the date you receive this Intent.

Mediation is not available in this proceeding. If you should have any questions please call John E. Griffin at (850) 245-8785.

Executed in Tallahassee, Florida.

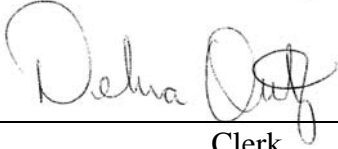
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

A handwritten signature in black ink, reading "Charles F. Goddard". The signature is written in a cursive style with a large, stylized "C" and "G".

Charles F. Goddard, Chief
Bureau of Solid & Hazardous Waste
2600 Blair Stone Road
Tallahassee, Florida 32399

CERTIFICATE OF SERVICE

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to S.120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

March 5, 2007

Date

cc: Jeff Pallas, EPA/Region 4 pallas.jeff@epamail.epa.gov
Ashwin B. Patel, DEP/Jacksonville Ashwin,Petal@dep.state.fl.us
Mayor, City of Jacksonville, jpeyton@coj.com
Mayor, City of Orange Park, opclerk@townoforangepark.com
Chairman, Clay County Board of County Commissioners, Harold.Rutledge@co.clay.fl.us
Heath Rauschenberger, U.S. Fish & Wildlife Service, heath_rauschenberger@fws.gov
Mary Ann Poole, Florida Fish and Wildlife Conservation Commission, maryannpoole@myfwc.com

Newspaper Notice:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE

THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP) GIVES NOTICE OF ITS INTENT TO ISSUE A PERMIT MODIFICATION UNDER SECTION 403.722, FLORIDA STATUTES (F.S.), AND CHAPTERS 62-4 AND 62-730, FLORIDA ADMINISTRATIVE CODE (F.A.C.) TO Safety-Kleen Systems, Inc. This permit relates to Safety-Kleen Systems Inc., Orange Park, Florida 32073, facility I.D. number FLD 980 847 214 and is issued as part of FDEP's hazardous waste management program, authorized pursuant to the Resource Conservation and Recovery Act and the Hazardous and Solid Waste Amendments (RCRA/HSWA).

The draft permit modification contains the modifications for Operating Permit 77130-HO-004. The permit modification contains conditions to change the existing used ethylene glycol storage tank to a used oil storage tank and to add a 2,700 gallon polyethylene tank for used ethylene glycol storage.

Copies of the application and the draft permit modification are available for public inspection during normal business hours 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at FDEP, Jacksonville District Office, Suite 200B, 7825 Baymeadows Way, Jacksonville, Florida 32256, (904)807-3300, and at Twin Towers Office Building, Division of Waste Management, Bureau of Solid & Hazardous Waste (BSHW), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, (850) 245-8785.

A person whose substantial interests are or will be affected by the Intent to Issue may petition for an administrative determination (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in FDEP's Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant and any of the parties entitled to written notice under section 120.60(3), F.S., must be filed within 45 days of receipt of the Intent. Petitions filed by any other persons within 45 days of publication of this notice of intent or receipt of the Intent, whichever occurs first. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within this time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which FDEP's action is based must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the FDEP Permit File Number and the county in which the project is proposed; (b) A

statement of how and when each petitioner received notice of FDEP's proposed action; (c) A statement of how each petitioner's substantial interests are affected by FDEP's proposed action; (d) A statement of all material facts disputed by petitioner, or a statement that there are no disputed facts; (e) A statement of facts which petitioner contends warrant reversal or modification of FDEP's proposed action; (f) A statement of which rules or statutes the petitioner contends require reversal or modification of FDEP's proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants FDEP to take with respect to FDEP's proposed action.

A petition that does not dispute the material facts on which FDEP's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that FDEP's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of FDEP have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Radio Announcement:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE

The Florida Department of Environmental Protection gives notice of its intent to issue a permit modification to Safety-Kleen Systems Inc., Orange Park, Florida, I.D. number FLD 980 847 214. The permit modification is to be issued under Section 403.722, Florida Statutes, and Chapters 62-4 and 62-730, Florida Administrative Code, as authorized by the Resource Conservation and Recovery Act and the Hazardous and Solid Waste Amendments (“wreck-ruh”/“hiz-wuh”). The permit modification contains conditions to change the existing used ethylene glycol storage tank to a used oil storage tank and to add a 2,700 gallon polyethylene tank for used ethylene glycol storage.

A person who is or will be substantially affected by the Department’s proposed permitting decision may file a petition for an administrative hearing in accordance with Sections 120.569 and 120.57, Florida Statutes. Any person may request a public meeting pursuant to Section 403.722(10), Florida Statutes. A petition for an administrative hearing or a request for a public meeting must be filed in the Office of General Counsel within forty-five days of broadcast of this radio announcement.

Mediation is not available in this proceeding.

For more information concerning the hearing process and the necessary time frames for filing, please contact the Office of General Counsel at (850) 245-2242. Copies of the application and the draft permit modification are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department's Hazardous Waste Regulation Section, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400, (850) 245-8785; and at the Department of Environmental Protection, Jacksonville District Office, Suite 200B 7825 Baymeadows Way, Jacksonville, Florida 32256, (904)807-3300.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 6, 2007

Sent Via Email

Jeff.Curtis@Safety-Kleen.com

Mr. Jeff Curtis
Environmental Health & Safety Manager
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

SUBJECT: Safety-Kleen Systems, Inc., Orange Park; FLD 980 847 214;
Operating Permit 77130-HO-004;
Duval County - Hazardous Waste

Dear Mr. Curtis:

This letter is in response to your request for permit modification to change the existing used ethylene glycol storage tank to a used oil storage tank and to add a 2,700 gallon polyethylene tank for used ethylene glycol storage, dated March 9, 2006 with additional information submitted October 13, 2006 and November 29, 2006. Upon review of these submittals, the Department finds your request satisfactory. Therefore, pursuant to Section 403.722(13), Florida Statutes (F.S.), and Rule 62-730.300(2), Florida Administrative Code (F.A.C.), the Department modifies the following conditions of the Permit:

<u>Specific Condition</u>	<u>From</u>	<u>To</u>
	Page 2	Page 2 Revised
	Page 34 of 69	Page 34 of 69 Revised
	Attachment A	Attachment A Revised
	Attachment D	Attachment D Revised
	Attachment E	Attachment E Revised

Mr. Jeff Curtis
March 6, 2007
Page Two

	Appendix A	Appendix A Revised
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This permit modification becomes effective immediately. All other conditions of the permit remain unchanged. This letter must be attached to the existing permit, and becomes part of that permit. As Permittee, you have appellate rights as set forth in the enclosed Notice of Rights.

If you have any questions, please contact John E. Griffin at 850 245-8785.

Very truly yours,

Charles F. Goddard, Chief
Bureau of Solid & Hazardous Waste

CFG/jeg

Enclosure

cc (with enclosure):

Jeff Pallas, EPA Region 4 pallas.jeff@epamail.epa.gov
Ashwin Patel, DEP/Jacksonville Ashwin.Patel@dep.state.fl.us

PERMITTEE:
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

I.D. NUMBER: FLD 980 847 214
PERMIT/CERTIFICATION NUMBER: 77130-HO-004
EXPIRATION DATE: DECEMBER 20, 2008

into the drum washer. Spent continued use solvent is then pumped to the hazardous waste storage tank. The Solvent Return/Fill Station area is 40 feet by 25 feet including the continued use station (Attachment D). A 2,700 gallon polyethylene waste ethylene glycol tank will is located in the Solvent Return/Fill Station (Attachment D)

Tank Storage:

Three 15,000 gallon tanks are underlain by a 49 feet 7 inches by 18 feet 8 inches concrete slab surrounded by a 48 inches high concrete wall (See Attachment E). A 12,000 gallon double walled tank is located outside the containment area. One of the above ground 15,000 gallon storage tanks is used for managing hazardous waste solvent under this permit. One 15,000 gallon tank and the 12,000 gallon tank are used for fresh solvent. Used oil, compatible with the hazardous waste solvent, is stored in one of the 15,000 gallon tanks. This tank is not and shall not be used for hazardous waste storage.

Mercury Containing Lamps and Devices Storage:

A maximum of 2,000 kilograms of mercury containing lamps and devices destined for recycling may be stored and managed in compliance with Rule 62-737.400, F.A.C.

Solid Waste Management Units:

Eleven solid waste management units have been identified at the facility in the RCRA Facility Assessment Report and in Appendix A of this permit. Confirmatory sampling recommended for SWMU 8 has not been completed. SWMU 10 has been designated as no further action but could be reclassified based on the sampling at SWMU 8. No remedial corrective action is required for the other SWMU's at the facility at this time.

HSWA Units: No further Action unless marked

- SWMU-1 Warehouse Container Storage Area
- SWMU-2 Paint Wastes Building
- SWMIJ-3 FRS Waste Building
- SWMU-4 Former Restaurant Filter Building
- SWMU-5 Return and Fill Area
- SWMU-6 Spent Mineral Spirits Tank
- SWMU-7 Used Oil Tank
- SWMU-8 Loading/Unloading Areas
- SWMU-9 Pallet Accumulation Area
- SWMU-10 BFI Dumpster – No Further Action unless SWMU-8 shows contamination
- SWMU-11 Spent Ethylene Glycol Tank

The State of Florida received authorization from EPA for implementing HSWA Corrective Action Program on November 17, 2000. This permit incorporates corrective action, including HSWA Corrective Action requirements and constitutes a full permit for Safety-Kleen Systems, Inc., Orange Park Facility under the Resource Conservation and Recovery Act (RCRA).

The Permittee, pursuant to this permit, is required to investigate any releases of hazardous waste or hazardous constituents at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases.

PERMITTEE:
 Safety-Kleen Systems, Inc.
 161 Industrial Loop South
 Orange Park, Florida 32073

I.D. NUMBER: FLD 980 847 214
 PERMIT/CERTIFICATION NUMBER: 77130-HO-004
 EXPIRATION DATE: DECEMBER 20, 2008

Appendix A

Solid Waste Management Units Summary

A.1. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a RCRA Facility Investigation (RFI):				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	Potentially Affected Media
There are no units identified at this time as requiring a RCRA Facility Investigation. * IM Required				
A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:				
SWMU/AOC No/Letter	SWMU/AOC Name	Unit Comment	Dates of Operation	
SWMU 1	Warehouse Container Storage Area	Regulated Unit	1985 to Date	
SWMU 2	Paint Wastes Building	Regulated Unit	1986 to Date	
SWMU 3	FRS Waste Building	Regulated Unit	1989 to 2000	
SWMU 4	Former Restaurant Filter Building		1988 to 1989	
SWMU 5	Return and Fill Area		1985 to Date	
SWMU 6	Spent Mineral Spirits Tank	Regulated Unit	1985 to Date	
SWMU 7	Used Oil Tank		1990 to Date	
SWMU 8	Loading/Unloading Areas		1985 to Date	
SWMU 9	Pallet Accumulation Area		1985 to Date	
SWMU 10	BFI Dumpster		1985 to Date	
SWMU 11	Spent Ethylene Glycol Tank		2005 to Date	

I.D. NUMBER: FLD 980 847 214
PERMIT/CERTIFICATION NUMBER: 77130-HO-004
EXPIRATION DATE: DECEMBER 20, 2008

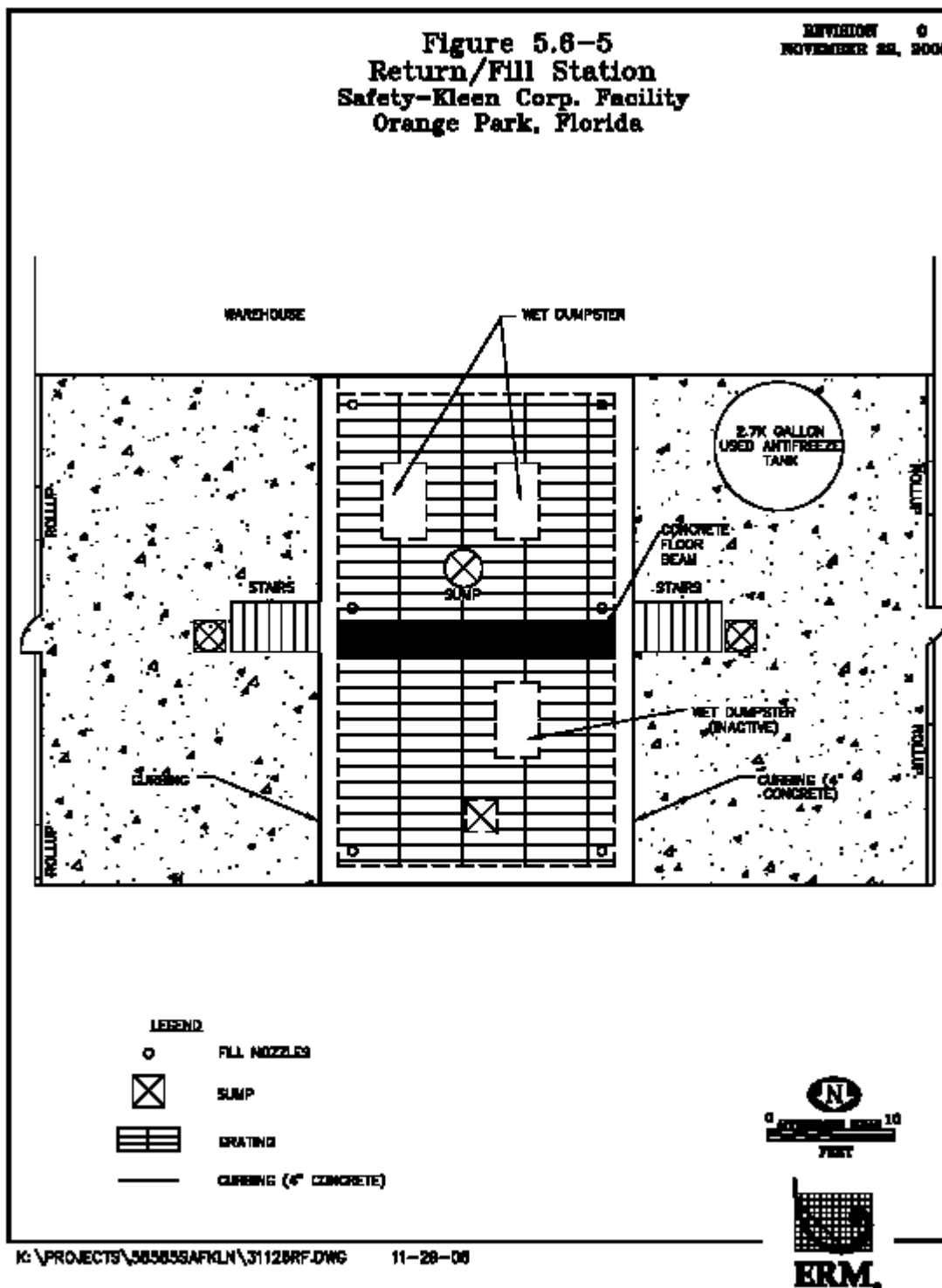
**Figure 5.1-1
Site Layout
Safety-Kleen Corp. Facility
Orange Park, Florida**



PERMITTEE:
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

I.D. NUMBER: FLD 980 847 214
PERMIT/CERTIFICATION NUMBER: 77130-HO-004
EXPIRATION DATE: DECEMBER 20, 2008

Attachment D Revised



PERMITTEE:
Safety-Kleen Systems, Inc.
161 Industrial Loop South
Orange Park, Florida 32073

I.D. NUMBER: FLD 980 847 214
PERMIT/CERTIFICATION NUMBER: 77130-HO-004
EXPIRATION DATE: DECEMBER 20, 2008

Attachment E Revised

