Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]

Sent: Tuesday, June 19, 2007 10:01 AM

To: Epost HWRS

Subject: RE: Safety-Kleen Systems, Inc., Orange Park; FLD 980 847 214

Received

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Tue 6/19/2007 8:53 AM
To: Curtis, Jeff
Cc: pallas.jeff@epamail.epa.gov; Patel, Ashwin; Bahr, Tim; Griffin, John; Baker, Bryan
Subject: Safety-Kleen Systems, Inc., Orange Park; FLD 980 847 214

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. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

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. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr Environmental Administrator Hazardous Waste Regulation Department of Environmental Protection E-Mail Address: epost_hwrs@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

June 19, 2007

SENT VIA EMAIL Jeff.Curtis@Safety-Kleen.com

Mr. Jeff Curtis Environmental Health & Safety Manger 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

Dear Mr. Curtis:

Enclosed is Permit Number 77130-HO-004 for modification of the 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. This permit is being issued pursuant to Section 403.722, Florida Statutes (F.S.), and Chapters 62-4, 62-160, 62-730, and 62-780, Florida Administrative Code (F.A.C.).

This permit modification is final and effective ("issued") on the date filed with the Clerk of the Department. When the permit is final, any party to the permit has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice to Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal.

The Notice of Appeal must be filed within thirty (30) days from the date the final permit is issued. If you should have any questions, please contact John E. Griffin at 850 245-8785 or John.Griffin@dep.state.fl.us.

Mr. Jeff Curtis June 19, 2007 Page Two

Sincerely,

J& Baho

Tim J. Bahr, Administrator Hazardous Waste Regulation

TJB/cs

cc with enclosure:

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



Florida Department of Environmental Protection

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

June 19, 2007

Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

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:

Specific Condition	From	<u>To</u>
	Page 2	Page 2 Revised
	Attachment A	Attachment A Revised
	Attachment D	Attachment D Revised
	Attachment E	Attachment E Revised
	Appendix A	Appendix A Revised

"More Protection, Less Process" www.dep.state.fl.us Mr. Jeff Curtis June 19, 2007 Page Two

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.

Sincerely,

Charles & Goddarf

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

CFG/jeg

Enclosure

cc (with enclosure):

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

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 the15,000 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).

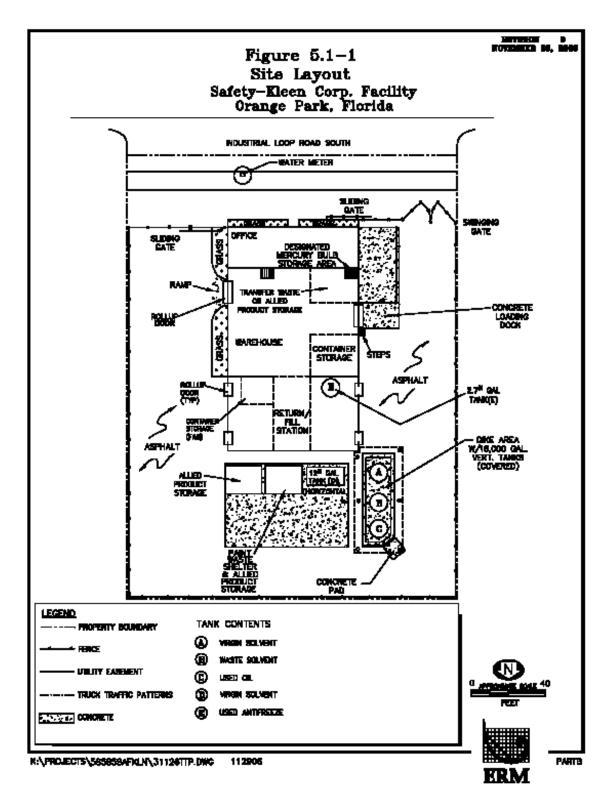
The Permittee, pursuant to this permit, is required to investigate any releases of hazardous waste or hazardous constituents at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases.

Appendix A

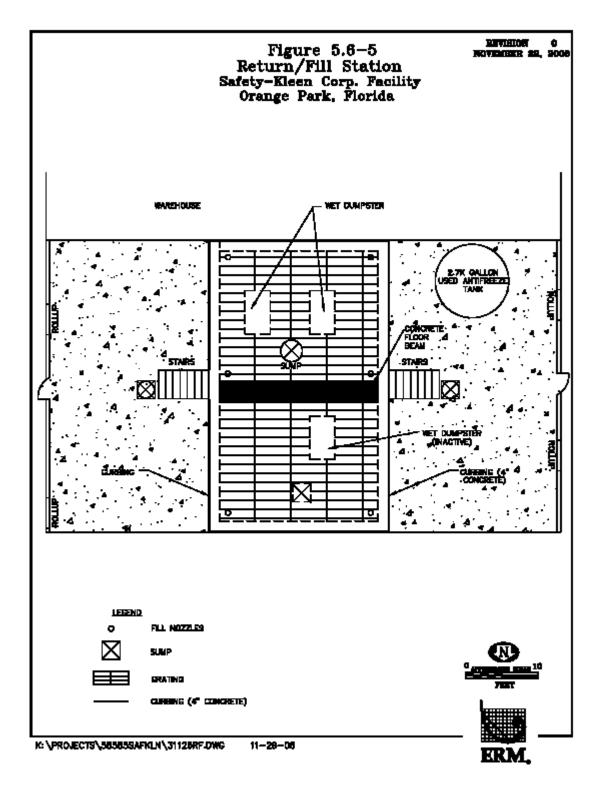
Solid Waste Management Units Summary

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 Commen	t	Dates of Operation	Potentially Affected Media	
There are no un * IM Required	its identified at this	time as requirin	ig a RCRA Fa	cility Investig	ation.	
A.2. List of s no further action		ement units (S	WMUs) and a	areas of conce	ern (AOCs) requiring	
SWMU/AOC No/Letter	SWMU/AOC Na	ame	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				<i>1985</i> 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				<i>1985</i> to Date	
SWMU 10	BFI Dumpster				1985 to Date	
SWMU 11	Spent Ethylene Glycol Tank				2005 to Date	

Attachment A Revised



Attachment D Revised



Attachment E Revised

