February 7, 2008

Mr. Daniel Kuncicky, PhD
Hazardous Waste Regulation Section
Florida Department of Environmental Protection
Tallahassee, FL 32399-2400

RE: Response to NOD 11/19/07 & Conference Call Regarding Closure Cost Estimates for Safety-Kleen, 8755 NW 95th St., Medley, FL 33178 Hazardous Waste Operating Permit Renewal. EPA ID# FLD984171694.

Dear Mr. Kuncicky:

Safety-Kleen (SK) has prepared the following response to the Department's Notice of Deficiency dated November 19, 2007 and subsequent conference call between the Department and SK for the above referenced facility.

The new Closure Cost Estimate Form (CCE) has been created by SK and incorporates many years of actual data from our branch closure activities. Hourly rates for particular workers/tasks were obtained from the RS Means Environmental Cost Data publication. These unit rates are calibrated using the RS Means localization factors available in the publication. SK has been able to validate our estimates using the CostPro software, but several calibrations must be made in order to get a good correlation. The greatest variations SK has identified are associated with the actual time required to complete closure, and the amount of rinsewater generated during these activities.

SK has attempted to prepare realistic closure cost estimates that are based on actual costs. CostPro software has become increasingly difficult to obtain and use as an estimating tool. SK maintains regular contact with EPA in Washington and has been repeatedly informed that copyright issues with CostPro will all but insure that it does not become readily available to the regulated community. For this reason, the SK specific closure estimating form has been assembled and is very representative of third party implementation costs.

When SK RCRA closes a service center, three to four competitive bids are sought from independent contractors with experience at our facilities. In general, a typical branch operation with above ground storage tanks can be RCRA closed for $50,000 to $60,000. This includes transport and disposal of closure-generated waste(s). As a point of reference, SK recently closed its El Paso, TX service center (June 2007). This facility had a single container storage area, a return and fill dock, and TWO (2) underground

storage tanks (USTs) that required removal as part of closure. The total for this closure project was approximately $55,000; including disposition of concrete from above the USTs and unimpacted soil surrounding the tanks.

CostPro typically grossly overestimates the quantity of rinsewater that is generated during RCRA closure operations. Actual generation rate for rinsewater from decontamination operations approximates 0.4 gallons per square foot. This includes the interior of the waste mineral spirits tank, the drum washer and return & fill structure, and all associated secondary containment structures. Water generation rates are relatively low for several reasons:

1) SK's waste mineral spirits tanks are pumped down very frequently during the normal course of business. This prevents the buildup of significant amounts of sludge or solids in the tank.
2) SK's waste mineral spirits is still a relatively clean product and does not build accumulated layers on tank sidewalls.
3) Decontamination of tanks, and return & fill structures is easily performed with a high pressure water and detergent wash. No scraping or other physical removal actions are generally needed.
4) Secondary containment structures and container storage areas are all epoxy coated and can be broom cleaned prior to washing. This leaves minimal material to be removed during the course of the remaining decontamination activities.

A typical branch closure project requires a week or less to complete. During the course of the closure activities, SK will stage a single tanker trailer at the facility. This trailer is used to accumulate all solids, waste solvent, rinsewater, etc. generated during the closure. Rinsewater from the container storage area is drummed, and disposed of separate from the other decontamination waters. Typically, this will generate 4-6 drums of water. In general, a single tanker trailer (6000 gallons or less) is more than adequate to contain all decontamination fluids. This material is disposed of within the SK system; however the CCE uses waste disposal rates from the Environmental Technology Council's (ETC's) website. ETC's numbers are updated regularly and independently, and are based on current market disposal rates. These rates are also used to estimate disposal costs for the line item showing the facility's maximum storage inventory. SK's estimates select the geographically closest SK recycle center location as the designated disposal facility. Transportation estimates in the CCE are based on this distance, and are typically conservative numbers. Third party disposal outlets are usually closer than our own locations but are not used in our CCEs.

Analytical for RCRA closure typically includes Volatile Organic Compounds (EPA 8260), RCRA Metals (EPA 6010), and sometimes Semi-Volatile Organic Compounds (EPA 8270). Costs for these analyses are based on current market rates which are $97, $90, and $275 respectively for a total of $462 per sample. This number is inflated in the CCE to allow for QA/QC samples and sample shipping to the laboratory.

SK's Remediation Group updates the CCE spreadsheet to reflect increases in the RS Means unit rates. In addition, ETC disposal rates are updated on a quarterly basis and verified at the time that a Closure Estimate is prepared. Contingency costs are built into

the actual estimate via the use of the RS Means data. These numbers are typically higher than those seen in our proposals. On rare occasion an additional 10% is added to the estimate, but that is typically State specific or in a circumstance where implementation of the closure is going to be particularly challenging due to geography, or other actual field condition.

Thank you for the Departments time in this matter. If you have any questions please do not hesitate to contact me at (561) 523-4719.

Best regards,

Jeff Curtis
EHS Manager
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, FL 33426
jeff.curtis@safety-kleen.comPage