Thursby, Kim

From: Schoepke, Robert [Robert.Schoepke@safety-kleen.com]
Sent: Wednesday, December 01, 2010 3:55 PM
To: Epost HWRS
Subject: RE: Safety Kleen Systems, Inc. FLD 984 171 694,draft RCRA Facility Assessment (RFA) Addendum

document rcvd.

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Wednesday, November 17, 2010 9:32 AM
To: Schoepke, Robert
Cc: Curtis, Jeff; Kantor, Karen E.; Knight.Karen@epamail.epa.gov; RStebnisky@ectinc.com; Winston, Kathy; Bahr, Tim; Russell, Merlin; Tripp, Anthony
Subject: Safety Kleen Systems, Inc. FLD 984 171 694,draft RCRA Facility Assessment (RFA) Addendum

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. (An automatic "reply message" is not sufficient to verify receipt). 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.

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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

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minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

Florida Department of
Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

November 17, 2010

VIA E-MAIL TO:
Robert.Schoepke@safety-kleen.com

Attn: Mr. Bob Schoepke
Safety Kleen Systems, Inc.
1502 East Villa Street, 2nd Floor
Elgin, Illinois 60120

Re: Safety Kleen Systems, Inc. FLD 984 171 694, Operating Permit 56019/HO/006, draft *RCRA Facility Assessment (RFA) Addendum*

Dear Mr. Schoepke:

Enclosed is a final RCRA Facility Assessment (RFA) Addendum, which is comprised of a status summary table for the units; and individual description tables for each new unit, location maps and photographs. Based on the recommendations provided in the Attachment and on observations made during the site visit, the Department determined an appropriate status for each of the units:

- No Further Action at This Time; or
- Remedial Action Required

In summary, the Department is recommending that No Further Action at This Time is an appropriate recommendation for the new Solid Waste Management Units. However, AOC A is recommended as Remedial Action Required.

As always, if you have questions, please feel free to contact me at (850) 245-8796 or e-mail me at merlin.russell@dep.state.fl.us.

Sincerely,

Merlin D. Russell Jr., Professional Geologist II
Hazardous Waste Regulation

MR/mdr
Attachment
e-mailed w/attachment to:
Jeff Curtis, Safety Kleen, Jeff.Curtis@safety-kleen.com
Karen Kantor, FDEP WPB, Karen.E.Kantor@dep.state.fl.us
Karen Knight, EPA/Region 4, knight.karen@epa.gov
Rick Stebnisky, ECT, RStebnisky@ectinc.com
Kathy Winston, FDEP WPB, Kathy.Winston@dep.state.fl.us

Safety Kleen Systems, Inc.
FLD 984 171 694
Operating Permit 56019/HO/006

RCRA Facility Assessment (RFA) Addendum

Prepared by

Merlin D. Russell Jr, P.G.
Kathy R. Winston

November 17, 2010

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1.0 Introduction

On February 12, 1993, Safety Kleen Medley's Hazardous and Solid Waste Amendments (HSWA) permit from the Environmental Protection Agency (EPA) Region 4 became effective. The HSWA permit expired on February 12, 2003. During that time, the Florida Department of Environmental Protection (FDEP or "the Department") received authorization to implement HSWA corrective actions. As a result of that authorization, the HSWA requirements were incorporated into the state permit (Safety Kleen's Operating Permit (OP)) on June 24, 2002.

The current Operating Permit 56019/HO/006 was issued on July 1, 2008 and contains the following SWMU summary:

A.7. List of SWMUs/AOCs Where No Further Action Determinations have been made based on no suspected or confirmed contamination:

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA
SWMU 1	Container Storage Area*	
SWMU 2	Above Ground Storage Tanks *	
SWMU 3	Return/Fill area	
SWMU 4	Mercury Lamps Storage Area	
SWMU 5	Used Antifreeze Tanker	
SWMU 6	Oil Filter Storage	
*Regulated Unit		

On October 4, 2010, Safety Kleen applied for a permit modification for a Remedial Action Plan for AOC A. In the course of its review, it was determined that solid waste management unit information required by Parts P and Q of the state's hazardous waste permit application needed updating because Safety Kleen's hazardous waste permit application only contained the three original Solid Waste Management Units from the original RCRA Facility Assessment. The permit application identified only:

- SWMU- 1 Container Storage/Transfer Waste Area
- SWMU- 2 Above Ground Storage Tank Area
- SWMU- 3 Return/Fill Area

The purpose of a RCRA Facility Assessment (RFA) is to compile existing information on environmental conditions at a given facility, including information on actual or potential releases. The RFA includes a review of existing information about a facility, a visit to the facility, and, if warranted, limited sampling to determine if there is an actual or potential release of

hazardous wastes or hazardous constituents from the SWMUs at the facility. The primary decision point is a determination of whether there is the potential for contamination at levels that would pose human health or ecological concerns. If no further investigation or remediation is necessary, the Department issues a "No Further Action at this Time" This RFA addendum provides an update for SWMU-3, and information on the other SWMUs and one Area of Concern (AOC). The information is based upon documents listed in Section 4.0 References of this addendum.

2.0 Chronology Update

The pathway to an updated RFA began when Safety Kleen submitted an April 2010 Site Assessment Report (SAR) to the Department for a small area of contamination discovered at the facility. This site assessment was conducted pursuant to Rule 62-780.600, Florida Administrative Code (F.A.C.), and Condition V.4 of Safety-Kleen's hazardous waste facility OP number 56019/HO/006. The primary objective of this SAR was to present information characterizing soil and groundwater contamination. Specifically, the SAR identified soil and groundwater impacts located in the vicinity of monitoring well MW-1, located near the above-ground storage tanks located on the north side of the facility. A chronology of key events pertaining to site assessment activities follows:

- May 1 and 15, 2009: As required by Condition 10 of Safety Kleen's DERM industrial waste operating permit, ECT collected groundwater samples from monitoring wells MW-1 and then, MW-2R. Groundwater samples were analyzed by Palm Beach Environmental Laboratories, Inc. (PBL) for Florida Petroleum Range Organics (FL-PRO) and for VOCs by U.S. EPA Method 8260B. The water quality analytical results in the report indicated the presence of chlorinated VOCs above the maximum contaminant levels (MCLs) at monitoring well MW-1. The FL-PRO analyses did not indicate the presence of petroleum range organics above the Practical Quantitation Limit in either sample.
- June 4, 2009: Safety-Kleen Systems, Inc. notified the Department of the presence of hazardous constituents in the environment discovered as part of its semiannual ground water sampling in accordance with its Miami-Dade DERM Industrial Waste Operating Permit.
- June 10, 2009: Safety-Kleen notified the Department they will implement Part V-General Corrective Action Condition #4 of the Resource Conservation and Recovery Act (RCRA) permit. The FDEP concurred via a June 11, 2000 email.
- August 17, 2009: ECT submitted the Sampling and Analyses Plan to FDEP.
- September 10, 2009: ECT collected two soils samples near monitoring well MW-1 and collected groundwater samples from each of the three monitoring wells present for analyses by EPA Methods 8260B, 8270C and RCRA eight metals.
- November 19, 2009: ECT collected four soil samples for arsenic, barium and EPA Method 8260B analyses, and three groundwater samples from the three existing monitoring wells present onsite for analyses by EPA Method 8260B. (Sample from monitoring well MW-1 analyzed by PBL as part of the DERM operating permit).
- January 13, 2010: ECT requested an extension of the deadline for the submittal of the site assessment report.
- January 15, 2010: FDEP granted an extension for the submittal of the site assessment report to April 16, 2010.

- February 4 and 5, 2010: ECT collected soil samples in the area around well MW-1 and at all monitoring well locations. Seven monitoring wells were installed on February 5, 2010.
- February 15, 2010: ECT collected groundwater samples from all 10 onsite monitoring wells for analyses by EPA Method 8260B.

The SAR was conditionally approved by the Department on May 13, 2010 (a combined document was required). The Department's letter required the submittal of a Remedial Action Plan (RAP) to remediate the contamination.

Safety Kleen submitted an August 9, 2010 RAP. This RAP was conditionally approved on September 3, 2010.

On October 4, 2010, Safety Kleen applied for a permit modification to implement the RAP for AOC A. In the course of processing the application, FDEP determined that existing solid waste management unit information contained in Parts P and Q of Safety Kleen's hazardous waste permit application needed updating.

Although originally scheduled for purposes other than pertaining to the permit modification, Kathy Winston (Inspector) and Ben Fisch (Environmental Specialist) from the West Palm Beach district office conducted an annual Compliance Evaluation Investigation (CEI) at the Medley facility on October 14, 2010. As part of their inspection, confirmation of the existing SWMUs and single AOC was conducted. Photographs were also taken of the units.

On November 2, 2010, Safety Kleen submitted updated SWMU/AOC information to the Department.

Included in this addendum are summary sheets describing each additional SWMU[1] and AOC, photographs and a location map.

[1] Other than the three original SWMUs identified in EPA's original HSWA permit.

3.0 Facility Description & Operations

The Safety Kleen Medley Facility is located in a highly industrial area of Medley. Industrial and commercial businesses are located for a least one-half mile in all directions and the area includes abandoned borrow pits and a solid waste landfill to the west. The facility is secure and surrounded by a security fence and access is through an electrically operated security gate. Only employees and designated, trained subcontractors are permitted within the operational sections of the facility.

For information purposes, the original three SWMUs are briefly described. SWMU-1 is the Container Storage/Waste Transfer Area. The container storage area is a 22'x32' area with a sloped floor leading to a collection sump. A maximum of 6,912 gallons of hazardous waste can be stored in this area at any one time.

SWMU-2 is the Above Ground Storage Tanks. Safety Kleen contains five above-ground storage tanks located on the northern side of the buildings. The tanks are located in an outdoor, roofed structure with secondary containment. The ASTs include two 20,000 gallon tanks containing virgin petroleum naptha used as a parts washer solvent, one 20,000 gallon tank containing used solvent (hazardous waste), one 10,000 gallon tank storing oily wastewater and one 15,000 gallon tank for storage of used oil. All tanks are above ground storage tanks and are underlain by a 58'x43' concrete slab surrounded by a 36" high concrete wall.

SWMU-3 is the Return/Fill Area. Spent solvents enter the waste solvent storage tank (SWMU-2) through the two wet dumpsters located in the Solvent Return/Fill Station. The wet dumpsters can hold a maximum of 504 gallons each but are not intended for storage of liquid hazardous waste. As an update, other waste management activities are currently conducted in the SWMU. This SWMU also contains the used oil samples that are pending analysis and contains the storage of used oil filters.

Safety-Kleen has also registered as a used oil and used oil filter transporter and transfer facility in accordance with Chapter 62-710, F.A.C.

Safety-Kleen has also registered as a transporter and storer of mercury containing lamps and devices that are regulated in accordance with Chapter 62-737, F.A.C. 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.

4.0 References

The following documents were used in preparation of this amended RFA.

- Safety Kleen's Application for a Hazardous Waste Permit, September 19, 2007
- Site Assessment Report, Safety Kleen Systems, Inc, Medley, Florida, April 8, 2010
- Remedial Action Plan, Safety Kleen Systems, Inc, Medley, Florida, August 9, 2010
- Hazardous Waste Inspection Report, October 14, 2010 (draft)
- Updated SWMU/AOC information from Safety Kleen in an e-mail, November 2, 2010

5.0 SWMU/AOC Summary Table

SWMU or AOC #	Waste Management Unit/Area of Concern Name	Type of Unit	Evidence of releases	Suggested Action: NFA at This Time	Suggested Action: Remedial Action Required	Wastes Managed
SWMU-1	Container Storage/Waste Transfer Area	Permitted storage unit	No	X		The permitted container storage area is a 22 feet by 32 feet area with a sloped floor leading to a collection sump. A maximum of 6,912 gallons of hazardous waste will be stored in this area at any one time. The container storage area is permitted to store waste solvents and paint wastes. The waste transfer area is located in the southeast corner of the container storage area but the wastes are kept separate (see location map for SWMU-4).
SWMU-2	Above Ground Storage Tanks	Permitted storage unit	No	X		One 20,000 gallon storage tank is used for managing waste solvent. One horizontal tank with a capacity of 10,000 gallon is used for storage of oily wastewater. One vertical tank with a capacity of 15,000 gallon is used for storage of used oil. All tanks are above-ground storage tanks and are underlain by a 58 feet by 43 feet concrete slab surrounded by a 36 inch high concrete wall. [For informational purposes only, two 20,000 gallon tanks are also used for storage of fresh solvent and are not used for storage of hazardous waste. Product storage does not meet the definition of a SWMU].
SWMU-3	Return/Fill area	Waste Collection Area	No	X		Spent solvents enter the waste solvent storage tank through the two wet dumpsters located in the Solvent Return/Fill Station. The wet dumpsters can hold a maximum of 504 gallons each but are not intended for storage of liquid hazardous waste. This SWMU also contains the used oil samples that are pending analysis. The SWMU also contains the storage of used oil filters.

SWMU-4	Mercury Lamps Storage Area	Accumulation & Storage	No	**X**		Safety-Kleen has registered as a transporter and storer of mercury containing lamps and devices that are regulated in accordance with Chapter 62-737, F.A.C. 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.
SWMU-5	Used Antifreeze Tanker	Accumulation & Storage	No	**X**		Spent antifreeze was formerly stored outside in a tanker truck.
SWMU-6	Used Oil Filter/Antifreeze Storage	Accumulation & Storage	No	**X**		Used oil filters are stored on the secondary containment for the aboveground storage tanks (SWMU-2). Antifreeze is now stored in totes on the secondary containment for the aboveground storage tanks (SWMU-2).
AOC-A	Alpha Area	Area of Contamination	Yes		**X**	No wastes were managed in this area. There were no known releases to this area.

6.0 SWMU/AOC Worksheets

WASTE MANAGEMENT AREA /AREA OF CONCERN
DATA SHEET (update)

WASTE MANAGEMENT AREA/AREA OF CONCERN REFERENCE NUMBER	SWMU-3
NAME	Return/Fill Area
TYPE OF UNIT	Accumulation and storage
DESCRIPTION OF WASTE MANAGED	Used solvents, used oil and used oil filters
PHYSICAL DESCRIPTION AND CONDITION	Spent solvents enter the waste solvent storage tank through the two wet dumpsters located in the Solvent Return/Fill Station. The wet dumpsters can hold a maximum of 504 gallons each but are not intended for storage of liquid hazardous waste. This area also contains the used oil samples that are pending analysis. These bottles are staged in, or near, metal cabinets located against the wall of the Return/Fill Area. Used oil filters are also stored in 55-gallon drums.
HISTORY AND/OR EVIDENCE OF RELEASE(s)	Yes but within containment area.
RECOMMENDATION	No Further Action at this time.
COMMENTS	

Photos of SWMU-3

The black boxes in the front are the fill and return boxes. Wastes are poured into the boxes, the liquid passes through a filter and the waste is pumped to the above-ground storage tanks outside.

Photos of SWMU-3 (cont.)

Used oil samples awaiting analytical testing results are stored in lockers labeled “Flammable”. The lockers are located along the east wall on the south side of walkway.

This photo shows a number of the oil samples. Used oil filters were in the 55-gallon drum in the foreground. Photographs taken October 14, 2010 by Ben Fisch.

WASTE MANAGEMENT AREA /AREA OF CONCERN DATA SHEET

WASTE MANAGEMENT AREA/AREA OF CONCERN REFERENCE NUMBER	SWMU-4
NAME	Mercury Lamps Storage Area
TYPE OF UNIT	Accumulation and storage
DESCRIPTION OF WASTE MANAGED	Fluorescent lights & devices
PHYSICAL DESCRIPTION AND CONDITION	The accumulation and storage area for spent mercury lamps and devices is located inside the southeast corner of the warehouse. Lamps are stored in 4’ and 8’ length boxes. The area has an approximate capacity of 100 boxes.
HISTORY AND/OR EVIDENCE OF RELEASE(s)	None
RECOMMENDATION	No Further Action at this time.
COMMENTS	Safety-Kleen has registered as a transporter and storer of mercury containing lamps and devices that are regulated in accordance with Chapter 62-737, F.A.C. 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.

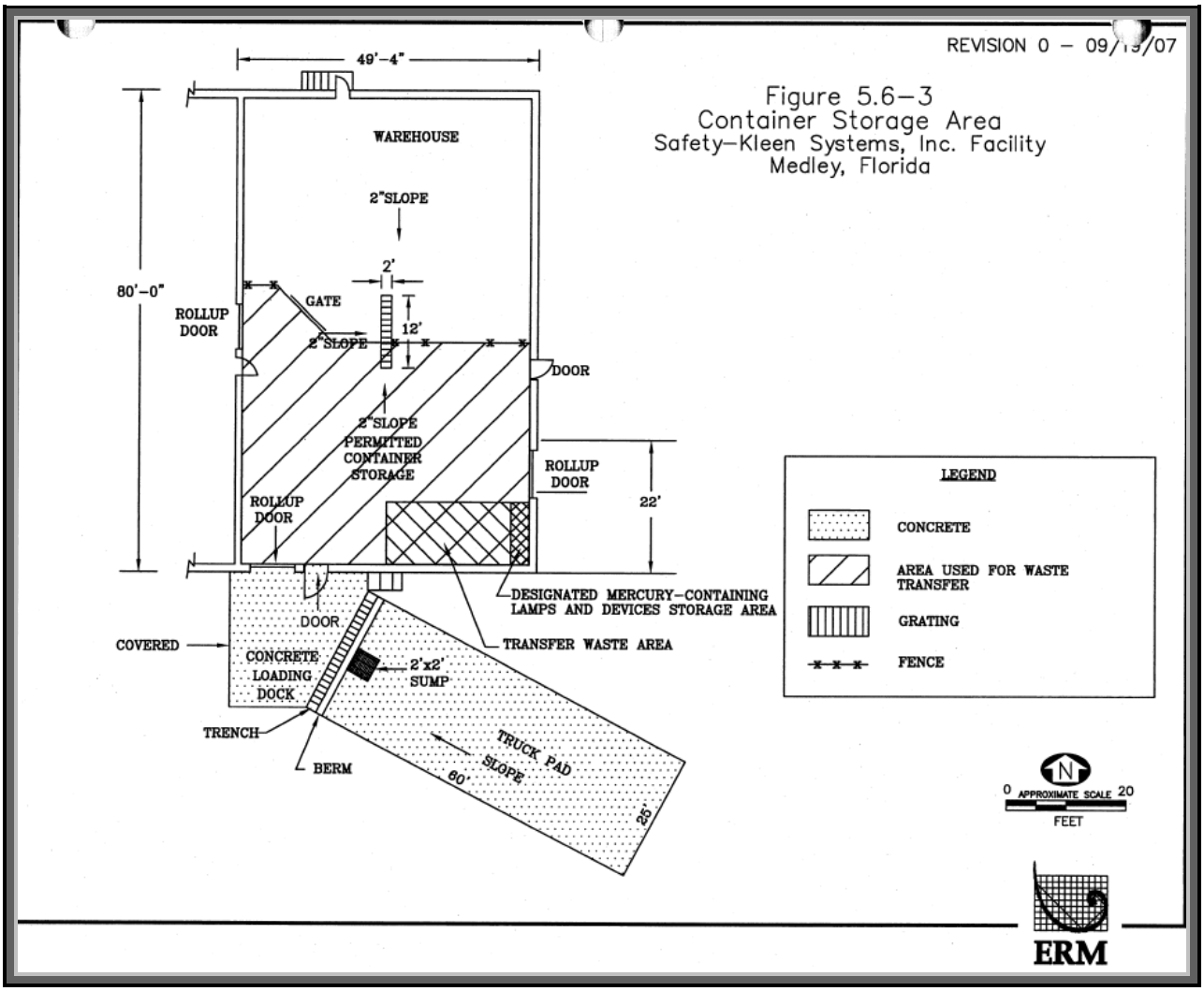

Figure 5.6-3 from Safety Kleen's September 19, 2007 Part B. This map identifies the locations of SWMU-1 (Container Storage/Waste Transfer Area), and SWMU-4 (Mercury Lamps Storage Area).

Photo of SWMU-4

Photographs showing the location of the Mercury Lamps Storage Area. The area is located within the Transfer Waste Area. The bulbs are stoed in boxes and one drum along the northern wall of the building. The photograph below shows a closeup of a 55-gallon drum containing fluorescent bulbs. Photographs taken October 14, 2010 by Ben Fisch.

WASTE MANAGEMENT AREA /AREA OF CONCERN
DATA SHEET

WASTE MANAGEMENT AREA/AREA OF CONCERN REFERENCE NUMBER	**SWMU-5**
NAME	Used Antifreeze Tanker
TYPE OF UNIT	Accumulation and storage
DESCRIPTION OF WASTE MANAGED	Used antifreeze
PHYSICAL DESCRIPTION AND CONDITION	Used antifreeze was formerly stored outside in a tanker truck. Antifreeze is now stored in totes within the secondary containment for the storage tanks.
HISTORY AND/OR EVIDENCE OF RELEASE(s)	None
RECOMMENDATION	No Further Action at this time.
COMMENTS	

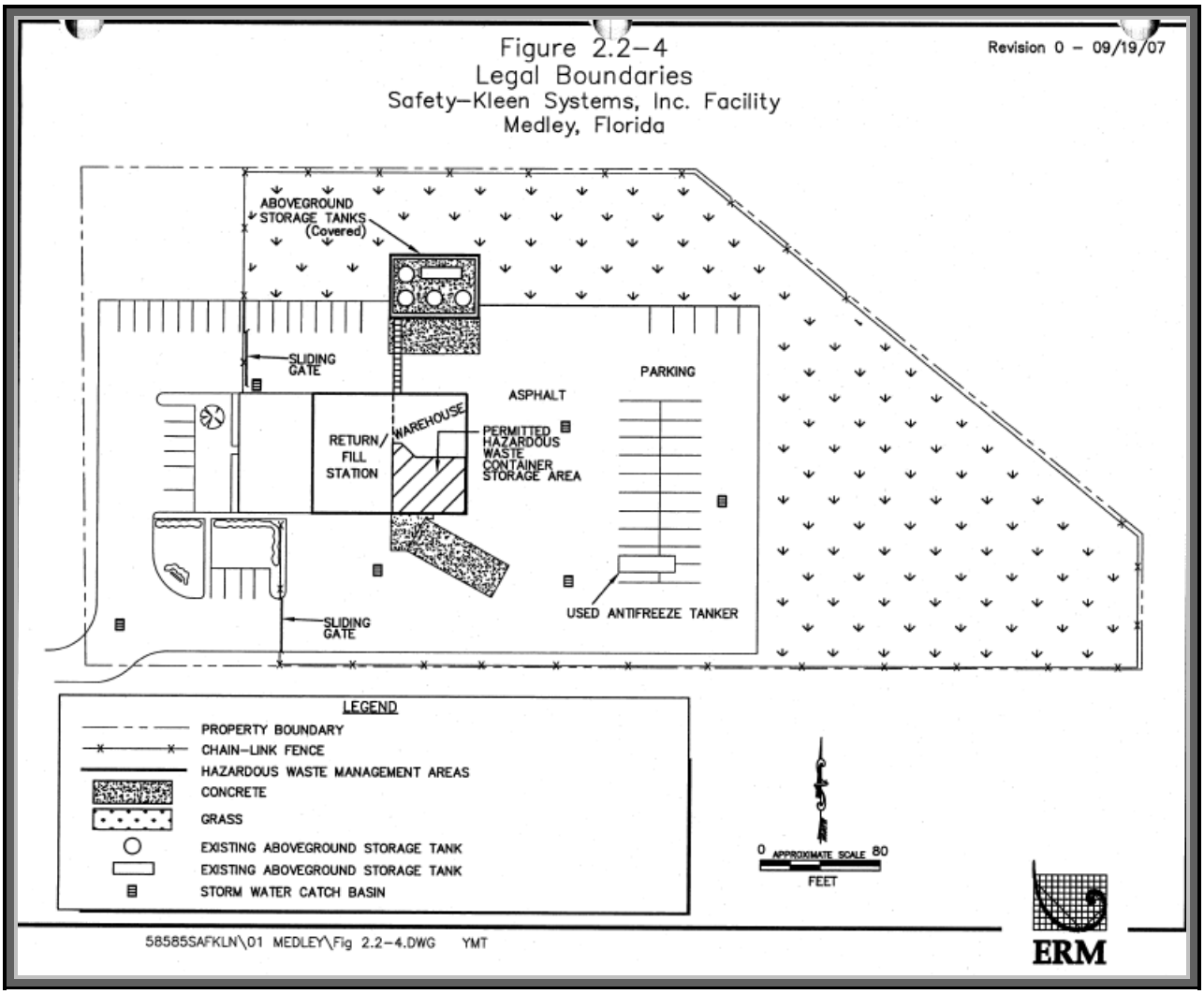

Figure 2.2-4 from Safety Kleen's September 19, 2007 Part B. This map identifies the original location of the Used Antifreeze Tanker (SWMU-5).

Photo of SWMU 5

Used Antifreeze Tanker (SWMU-5) in background. The tanker is currently located in the southeast corner of the rear parking lot. Photograph taken October 14, 2010 by Ben Fisch.

WASTE MANAGEMENT AREA /AREA OF CONCERN
DATA SHEET

WASTE MANAGEMENT AREA/AREA OF CONCERN REFERENCE NUMBER	SWMU-6
NAME	Used Oil Filter/Antifreeze Storage
TYPE OF UNIT	Accumulation and storage
DESCRIPTION OF WASTE MANAGED	Used oil filters
PHYSICAL DESCRIPTION AND CONDITION	Used oil filters are stored on the secondary containment for the aboveground storage tanks (SWMU-2)
HISTORY AND/OR EVIDENCE OF RELEASE(s)	Yes but within containment area.
RECOMMENDATION	No Further Action at this time.
COMMENTS	Oil filter storage on the secondary containment for the aboveground storage tanks (SWMU-2) consists of three bins with approximately 400 gallons of capacity each. Antifreeze storage in this area includes three 350 gallon totes.

Photo of SWMU 6

Photograph showing antifreeze storage tote (front left) and bins containing used oil filters. Containers are staged on the concrete pad of the above-ground storage tank area (SWMU-2). Photograph is facing southwest. Open doors in the background are the northern side of the return/fill station. Photograph taken October 14, 2010 by Ben Fisch.

WASTE MANAGEMENT AREA /AREA OF CONCERN
DATA SHEET

WASTE MANAGEMENT AREA/AREA OF CONCERN REFERENCE NUMBER	AOC-A
NAME	Alpha Area
TYPE OF UNIT	Grassy area not used to manage wastes
DESCRIPTION OF WASTE MANAGED	Wastes were not managed at the unit
PHYSICAL DESCRIPTION AND CONDITION	This AOC is a grassy area located in the vicinity of monitoring well MW-1, adjacent to the western side of the aboveground storage tank area. The area impacted by arsenic-contaminated soils is an area less than 150 ft^2. Groundwater impacts were initially estimated to be limited to an area of approximately 470 ft^2 and limited to the shallow monitoring wells.
HISTORY AND/OR EVIDENCE OF RELEASE(s)	Soil samples indicate the presence of tetrachloroethylene and arsenic above cleanup target levels. Groundwater samples indicated the presence of chlorinated solvents. Detailed information can be found in the site assessment report dated April 8, 2010.
RECOMMENDATION	Remedial Action Required
COMMENTS	The area of concern where impacts to the environment were delineated is within the secured perimeter of the facility. There currrently appears to be little or no potential for the migration of identified contaminants past the facility property boundary or the secured areas. The water table at the site is relatively flat and the plume does not appear to be migrating.

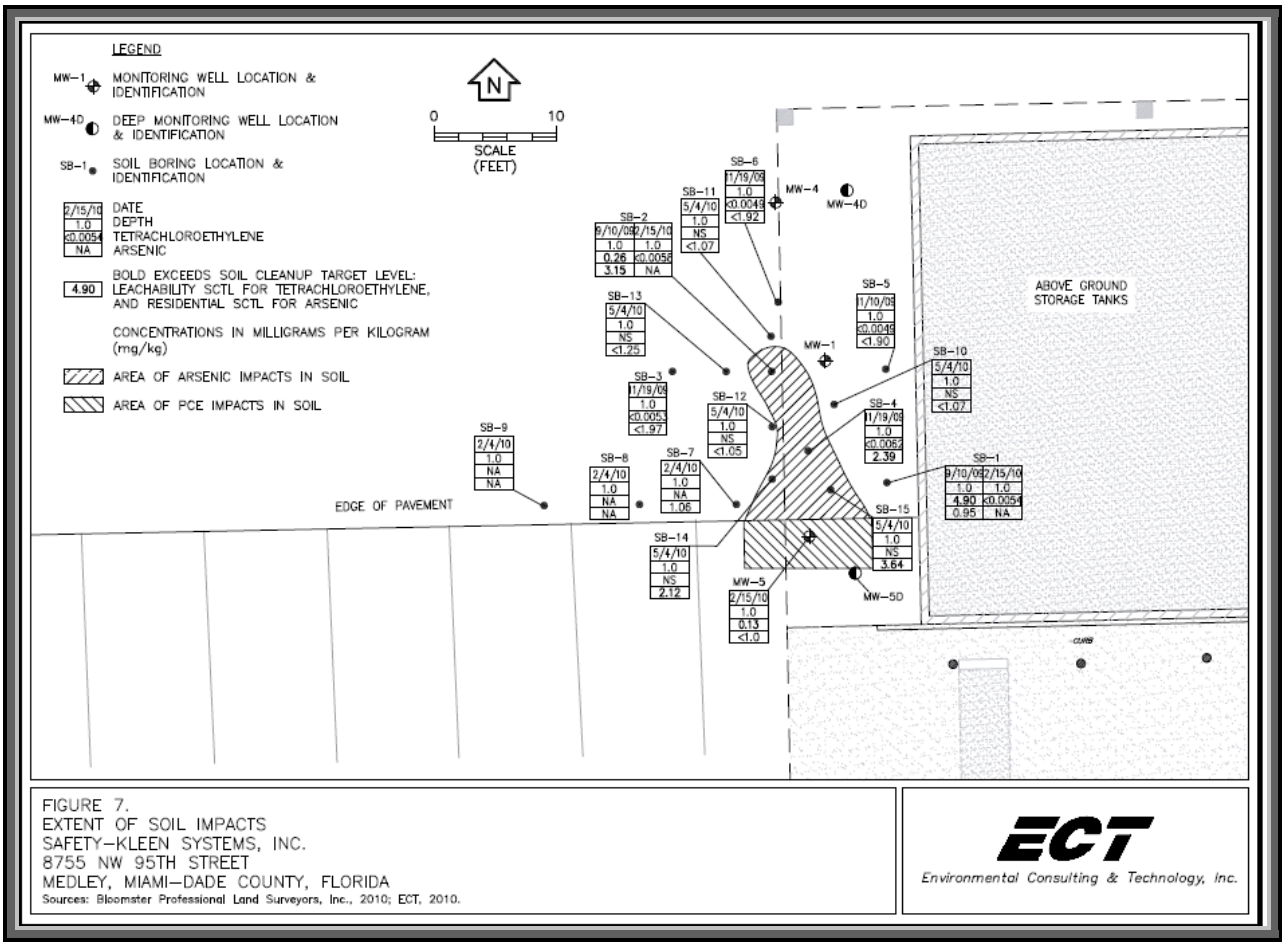

Figure 7 of the August 2010 *Remedial Action Plan* showing the location of soil impacts at AOC A (hatched areas).

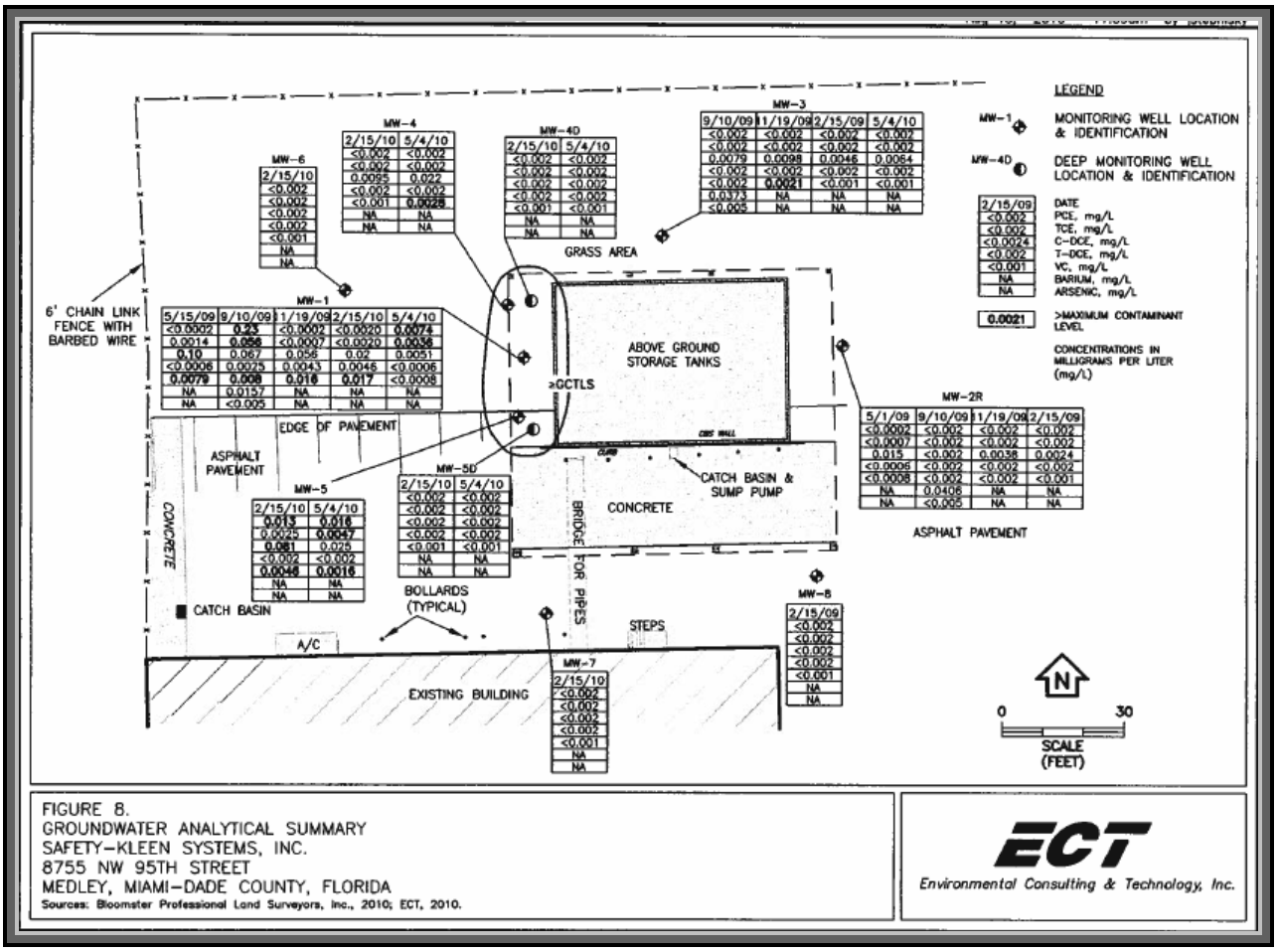

FIGURE 8.
GROUNDWATER ANALYTICAL SUMMARY
SAFETY-KLEEN SYSTEMS, INC.
8755 NW 95TH STREET
MEDLEY, MIAMI-DADE COUNTY, FLORIDA
Sources: Bloomster Professional Land Surveyors, Inc., 2010; ECT, 2010.

ECT
Environmental Consulting & Technology, Inc.

Figure 8 of the August 2010 *Remedial Action Plan* showing the approximate extent of groundwater impacts at AOC A

Photo of AOC A

Photograph showing Alph Area (AOC A) facing north/northeast. Photograph taken November 15, 2010 by Jeff Curtis. Note monitoring wells: MW-4 in front of rear roof support; MW-4D in the grassy area between MW-4 and the corner of the black secondary containment wall; MW-5 just right of the yellow curb on the parking lot, and MW-5D at the far right under the red hose.