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ATKEARNEY

December 1, 1989

Ms. Rowena Sheffield
Regional Project Officer
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R04-01-20; Safety-Kleen Corporation, Tampa, Florida; EPA I.D. No. FLD908847271; Interim RFA Report; Final Deliverable

Dear Ms. Sheffield:

Enclosed please find the Interim RCRA Facility Assessment report based on the preliminary file review and Visual Site Inspection (VSI) of the above-referenced facility.

The Safety-Kleen Corporation facility located in Tampa, Florida occupies approximately three acres. Safety-Kleen acts as a service, storage and transfer facility, and has been active since 1986. Based on the file review and VSI of the facility, a total of twelve solid waste management units (SWMUs) were identified at the site.

If you have any questions please call me or Rajesh Aji, the Kearney Team Work Assignment Manager (who can be reached at 703/836-6210), if you have any questions.

Sincerely,

Ann L. Anderson

Ann L. Anderson
Technical Director

cc: H. Hazen, EPA OSW
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3548E

Docket: SKCT-N-20

INTERIM RCRA FACILITY ASSESSMENT

SAFETY-KLEEN CORPORATION
Tampa, Florida

EPA I.D. No. FLD980847271

Prepared for:

Ms. Rowena Sheffield
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Prepared by:

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EPA Contract No. 68-W9-0040
Work Assignment No. R04-01-20

December 1989

Safety-Kleen Corporation
Tampa, Florida
EPA I.D. No. FLD980847271

TABLE OF CONTENTS

		Page
I.	EXECUTIVE SUMMARY	I-1
II.	INTRODUCTION	II-1
	A. File Search and VSI	II-1
	B. Facility Description	II-2
	C. Environmental Setting	II-7
III.	SWMU DESCRIPTIONS	III-1
IV.	SUMMARY	IV-1
V.	SUGGESTED SAMPLING STRATEGY	V-1
VI.	REFERENCES	VI-1

APPENDIX A: SWMU Location Map, Safety-Kleen

APPENDIX B: VSI Log Book

APPENDIX C: Photograph Log

Safety-Kleen Corporation
Tampa, Florida
EPA I.D. No. FLD 980 847 271

LIST OF FIGURES

Figure No.		Page
II-1	Facility Location Map	II-8

LIST OF TABLES

IV-1	List of all SWMUs	IV-2
IV-2	List of SWMUs Requiring No Further Action	IV-3
IV-3	List of SWMUs that are RCRA-Regulated Units	IV-4
IV-4	List of SWMUs Requiring Phase II Sampling	IV-5

I. EXECUTIVE SUMMARY

The Safety-Kleen Corporation (Safety-Kleen) facility is located in Tampa, Florida, and occupies approximately three acres within a light industrial area, with open fields and residential housing nearby. Safety-Kleen acts as a service, storage and transfer facility. The company, which began operating at this site in 1986, leases small-parts washers and solvents to customers, collects spent solvents from customer sites and stores the waste solvents at the Tampa facility until they are shipped to one of Safety-Kleen's recycling centers in Lexington, South Carolina. The Tampa site also acts as a transfer facility for wastes from other Safety-Kleen facilities in South Florida.

Hazardous waste managed by this facility is classified as D001, D006, D007, D008, F001, F002, F004, F003 and F005. This hazardous waste includes: waste solvents; mineral spirits, 1,1,1-trichloroethylene, methylene chloride, 1,1,2-trichloro-1,2,2-trifluoroethane, and lacquer thinners; dry-cleaning wastes; paint wastes; wet dumpster and tank bottom sludge; and immersion cleaner (which contains chlorinated solvents and cresylic acid). Approximately 874,000 gallons of hazardous waste is stored and shipped annually from this facility.

The facility has experienced several small spills or releases in the four years it has been in operation. According to the available information, these spills have been confined to concrete/paved areas and did not reach surrounding soils. In each case, the spilled material was cleaned from the contained areas using an absorbent. The resultant waste from cleanup activities was sent off-site for disposal.

A total of twelve SWMUs were identified through the file review and VSI of the facility. Based on the review of the facility's files, and on observations during the VSI, the greatest potential for release of hazardous constituents is from the Old Dumping Ground, (SWMU 11). The suggested further action is to sample the soil in this area.

II. INTRODUCTION

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authority to the Environmental Protection Agency (EPA) to require comprehensive corrective action for releases of hazardous waste and hazardous constituents from solid waste management units (SWMUs) and areas of concern (AOCs) at all operating, closed or closing RCRA-regulated facilities. The intent of this authority is to address previously unregulated releases to air, surface water, soil and groundwater, and the generation of subsurface gas. In order to accomplish this objective, a RCRA Facility Assessment (RFA) is undertaken, consisting of a Preliminary Review (PR) of available and relevant documents, a Visual Site Inspection (VSI) and, if warranted, a Sampling Visit (SV).

This report summarizes the results of the RFA of the Safety-Kleen Corporation, Tampa, Florida, facility. The report is based on a review of the file materials maintained at EPA Region IV and the Florida Department of Environmental Resources (FDER) including RCRA, CERCLA, Air, Water and Groundwater files. A Visual Site Inspection (VSI) was performed October 2, 1989.

Section II discusses the facility's ownership and regulatory history, process description, waste management practices, and history of releases. The facility's environmental setting, such as location and surrounding land use and geology and soils, is also presented in this section. A description of the SWMUs is presented in Section III in the form of a checklist. Section IV contains a summary of the findings from the PR and VSI. A suggested sampling strategy is discussed in Section V. References used to prepare this report are listed in Section VI. A map of the facility identifying the locations of the SWMUs is presented in Appendix A. Appendix B contains a copy of the VSI field notes, and Appendix C consists of the VSI photographic log.

A total of twelve SWMUs were identified as a result of the assessment. Table IV-1 in Section IV lists the SWMUs identified during the PR and VSI. Figure A-1 in Appendix A shows the approximate location of each SWMU identified at the facility.

A. FILE SEARCH AND VSI

The file search of the regional files for the facility was conducted by Pat Martz of A.T. Kearney, Inc. The file search at the state office was conducted on August 14, 1989, by Deirdre McNulty of A.T. Kearney, Inc. The Visual Site Inspection (VSI) of the Safety-Kleen facility in Tampa, Florida, was conducted on October 2, 1989. The following individuals participated in the VSI:

Rajesh Aji	A.T. Kearney, Inc.
Gail Carter	Kearney/Centaur
Paul Pederson	Safety-Kleen

Frank Taylor	Safety-Kleen
James Davis	Safety-Kleen
David Galloway	Safety-Kleen
Hugh Hazen	US EPA Region IV
William Neimes	FDER-Tallahassee
Debra Kolme	FDER-Tampa

The inspection team arrived at the Safety-Kleen facility at 9:00 a.m., Eastern Daylight Time (EDT), on October 2, 1989. An introductory meeting was held in the Service Center Sales Office. The facility representatives were briefed by EPA on the purpose and scope of the VSI. At this time the potential solid waste management units were discussed, and the available information for each unit was reviewed.

The introductory meeting ended at 10:00 a.m., EDT, and the team proceeded to the facility buildings and grounds for the VSI. The weather was clear, sunny and humid. The temperature was approximately 85°F and the winds were southwesterly.

Photographs were taken by Rajesh Aji, of A.T. Kearney, Inc., using a Canon Automatic camera and Kodak 200 ASA color print film. The VSI was completed by 11:15 a.m., EDT, and the team remained at the facility while the facility representatives collected and copied additional information not obtained during the original file searches. The VSI Team left the facility at 12:00 p.m., EDT.

B. FACILITY DESCRIPTION

Ownership and Regulatory History

The Safety-Kleen facility in Tampa, Florida, was built and began operating in 1985 under the ownership of the Safety-Kleen Corporation. The Safety-Kleen Corporation continues to operate the facility. According to the facility representatives, prior to 1985 the site consisted of a vacant lot. The eastern portion of the property - Old Dumping Ground (SWMU 11) - was used as a dumping ground for assorted rubbish. No information was available regarding the source of this rubbish or past ownership of the property.

In July 1985, Safety-Kleen submitted their initial RCRA Part A permit application to the FDER (Reference 4). The facility also notified EPA of its hazardous waste generator and transportation activities. In June 1986, Safety-Kleen submitted its RCRA Part B permit application to FDER for the storage of waste mineral spirits (D001, D006, D008) in a 15,000-gallon, above-ground tank and for two container storage areas for hazardous waste (D001, D006, D007, D008, F001-F005). The total capacity for the two container storage areas is 75,000 gallons. A revised Part B permit application was submitted in August 1988, and is currently under review by FDER. At this writing, Safety-Kleen has not been issued a RCRA Part B permit.

In June 1985, Safety-Kleen submitted a Construction Permit Application Number HC 29-118986 for the construction of a hazardous waste tank and container storage area. The FDER responded to the construction permit application over the following four months with four Notices of Deficiencies (NODs). Some of the deficiencies noted were as follows: submission of a scale map locating drinking water wells within one-quarter mile from the facility; correction of EPA I.D. numbers; submission of a drawing showing the wet dumpsters' locations; and drawings which were not certified by a registered engineer (References 11, 12, 13, 14 and 15). In September 1988, FDER issued Safety-Kleen a permit to construct the hazardous waste tank and container storage area (Reference 22). At this time, the facility has no other federal or state environmental permits.

Process Description

The Tampa Safety-Kleen facility is a service-oriented operation that leases small-parts washing equipment which use hydrocarbon and halogenated solvents from automotive repair and industrial maintenance shops. The parts washers are leased to customers under a contractual agreement that provides regularly-scheduled solvent changes and machine maintenance. Under the agreements between Safety-Kleen and its customers, the "ownership" of the solvents remains with Safety-Kleen; the customers "lease" the solvents. The solvents remain the property of Safety-Kleen and approximately two-thirds of the clean solvent leased to customers is the product of the recycling process, which the Safety-Kleen Corporation operates in their Lexington, South Carolina, facility.

In addition to operating as a service center for customers within the Tampa Bay area, this Safety-Kleen facility operates as a transfer station for other Safety-Kleen service centers and waste solvents transfer stations in southern Florida (Reference 27). As a transfer station, waste solvents are shipped to this facility for consolidation before being shipped to Safety-Kleen's recycling facility in Lexington, South Carolina. The service center and transfer station operations are run independently of one another at the Tampa facility (References 27, 29).

The Tampa Safety-Kleen facility is only involved in hazardous waste generation, transportation, and storage. No treatment or reclamation activities are conducted at this facility.

Transfer Facility Process

As a transfer facility, this Safety-Kleen location handles dumpster sediment, dry-cleaning wastes, paint waste, industrial solvents, and spent immersion cleaner. The immersion cleaner is collected at other transfer stations located in South Florida, and is then shipped to the Tampa transfer station for consolidation. The spent immersion cleaners (D001, F002 and F004) and perchloroethylene (PCE) solvent still bottoms and filter cartridges, from the dry cleaning industry arrive at the Service Center in 16- or 30-gallon drums. These wastes remain in their original containers, and are stored in the Service Center Drum Storage

Area (SWMU 1) and the Accumulation Center Drum Storage Area (SWMU 8), until enough containers have accumulated for a full shipment. Wastes are consolidated into a full truckload and shipped on a weekly basis to the Lexington recycling facility.

All wastes shipped to the Tampa facility are sent with a hazardous waste manifest listing the Tampa Safety-Kleen as the designated facility (References 27 and 39). Prior to shipment to the recycling facility, the hazardous waste labels are removed from the drummed waste and are replaced with new labels that denote the Tampa facility as the generator. When the wastes are shipped to South Carolina, a manifest is readied showing the Tampa facility as the generator of this waste and the South Carolina Safety-Kleen facility as the transporter and designated facility. The above arrangement was initiated and agreed upon by Safety-Kleen and FDER provided the waste is not stored at the Tampa facility for more than 10 days (Reference 27). This arrangement facilitates compliance with regulations during the permitting process for all seven Safety-Kleen facilities in Florida.

Additionally, the Tampa facility acts as a transfer station for paint waste, which is sent to another Safety-Kleen facility for reclamation. These wastes, which contain various thinners and paints, are collected in five-gallon pails and sixteen-gallon drums, and are stored in the Drummed Flammable Waste Storage Room (SWMU 10) until a truckload of waste has accumulated and is then sent to an independent reclaimer. The recovered solvent is then returned to Safety-Kleen and is redistributed to facility customers for use as product.

Service Center Process

Upon arrival at the Service Center, the drummed spent mineral spirits are emptied into one of three Solvent Return Wet Dumpsters (SWMU 3), which are located in the Drummed Waste Loading Dock Area (SWMU 9). Metal grating within these wet dumpsters filters out extraneous material that may be present in the spent solvent, such as metal parts, rags and paper. The solvent is allowed to settle, and the liquid portion is pumped to a 15,000-gallon Waste Solvent Storage Tank (SWMU 6). This waste solvent is shipped off-site approximately once every seven days by tanker truck to the recycling facility in Lexington, South Carolina. The solvent sludge that accumulates at the bottom of the wet dumpsters along with the plastic drum liners are put in 16- or 30-gallon drums, and are also shipped to the recycling center where the sludge is blended for use as an alternate fuel in cement kilns. The fuel is then shipped off-site to Safety-Kleen cement kilns.

The empty waste solvent drums are rinsed with clean recycled solvent in the Drum Rinsing Area (SWMU 5), and are filled with clean solvent supplied by the Lexington recycling facility. This clean solvent is stored in a 15,000-gallon tank located adjacent to the Waste Solvent Storage Tank (SWMU 6). The clean solvent is then returned to customers throughout the area which the Tampa Safety-Kleen facility serves.

No analytical testing is performed on the waste solvents at the Tampa facility. Before accepting an industrial client's/customer's waste for recycling, a sample is taken and analyzed at Safety-Kleen's corporate laboratory in Elgin, Illinois. Specific criteria is used to determine whether the waste stream contains contaminants such as pesticides, herbicides, pharmaceuticals, printing or inking operation waste, etc. Sales representatives who service the parts washing machines, visually examine the spent product for consistency and volume of material recovered during their routine stops. The odor is also noted to test for the presence of volatile materials such as gasoline.

Wastes Managed

Several types of hazardous wastes are managed by the Safety-Kleen facility. Some of these wastes result from the servicing of Safety-Kleen customers, while others result from the maintenance of the service and accumulation centers.

Spent mineral spirits solvent is classified by Safety-Kleen as an ignitable and an EP Toxic Waste (D001, D006, D008) because the solvent may contain lead and/or cadmium. This waste solvent arrives at the Safety-Kleen facility in 30- and 16-gallon drums. The drummed solvent is transferred to Solvent Return Wet Dumpsters (SWMU 3), where the suspended solids are allowed to settle out.

Dumpster sediment that accumulates at the bottom of the Solvent Return Wet Dumpsters (SWMU 3) is classified as an ignitable waste (D001) and possibly an EP Toxic Waste (D006 and/or D008). This dumpster sediment is removed manually with a shovel on an as-needed basis and is transferred to 16-gallon drums. These drums are stored in the Drummed Flammable Waste Storage Room (SWMU 10) until they are transferred to the Safety-Kleen recycling facility in Lexington, South Carolina. (At the recycling facility, the dumpster sediment is blended into an alternate fuel to be used in cement kilns.) The facility representatives estimate that approximately 12,000 gallons of dumpster sediment are shipped annually from the Safety-Kleen, Tampa, facility.

Bottom sediment in the Waste Solvent Storage Tank (SWMU 6) is removed approximately every two years. The composition and classification of this bottom sediment are similar to the Solvent Return Wet Dumpsters' (SWMU 3) bottom sediment. A Safety-Kleen vacuum truck is used to remove this sediment, which is then shipped to the recycling facility in South Carolina for blending into alternate fuels.

Immersion cleaner from the small parts washers contains chlorinated solvents (F002) and cresylic acid (F004). The wastes remain in their original drums. Approximately every seven to ten days, enough drummed immersion cleaner is accumulated at the Tampa facility for a full shipment to the recycling facility in South Carolina. It is estimated that 20,000 gallons are shipped from the Tampa facility to the recycling facility on an annual basis (References 35 and 39).

Dry-cleaning wastes are containerized while on the customer's premises. These wastes, which consist of still bottoms, powder residue from filter systems and spent filter cartridges, are transferred to 30- and 16-gallon drums and polyethylene filter tubes, and are placed in lined boxes. The containerized dry-cleaning wastes are then shipped by Safety-Kleen directly to the Service Center Drum Storage Area (SWMU 1) at the Tampa facility. The wastes are stored here until they can be shipped to the recycling center in Lexington. Approximately eighty percent of the dry-cleaning solvent managed by this facility is perchloroethylene (F002); seventeen percent is mineral spirits (D001, D006 and D008); and the remaining three percent is trichloro-trifluoroethane (F002) (Reference 35). It is estimated that 150,000 gallons of dry-cleaning waste are shipped annually from the accumulation center to the recycling facility.

Paint and paint equipment cleaning wastes consist of various lacquer thinners (D001, F003 and F005) and paints (D006, D007 and D008). These wastes are collected in 5- or 16-gallon drums at the customer's place of business, and are stored in the Drummed Flammable Waste Storage Room (SWMU 10) for approximately seven to ten days. They are then shipped to the Lexington facility for recycling.

Seven different types of industrial solvents are collected from customers. These solvents and the estimated annual amounts are collected annually are: mineral spirits (D001, D006 and D008), 38,600 gallons; 1,1,1-trichloroethylene (F001 and F002), methylene chloride (F001 and F002) and 1,1,2-trichloro-1,2,2-trifluoroethane (F001 and F002), 157,600 gallons (combined total for all halogenated solvents); and lacquer thinners (D001, F003 and F005), 60,400 gallons.

History of Releases

The review of available file material and discussions with facility representatives during the VSI identified a one-time release of 50 gallons of petroleum naphtha from the product storage tank adjacent to the Waste Solvent Storage Tank (SWMU 6) and ten smaller releases of various hazardous wastes ranging in quantity from 1 to 20 gallons.

The 50-gallon release of petroleum naphtha occurred on June 16, 1986. Both the Waste Solvent Storage Tank (SWMU 6) and the adjacent product storage tank were tested according to manufacturer specifications and were being filled to begin routine operation at the facility (Reference 16). The product tank's manway was removed to facilitate the installation of the tank gauges, and upon filling the tank, the manway gasket was found to be leaking. The release was contained in the diked area that surrounds the tank, and the spill was cleaned up with absorbent towels which were then drummed and sent to the Safety-Kleen Recycling Center in Lexington, South Carolina.

Pinholes present in two drums resulted in two of the ten "smaller" releases (one and two gallons of F002 were released) (Reference 38). Four releases were the result of "mismanagement" of the drums, such as a

drum being punctured with a handcart or tipped over while being transported with a handcart. These releases of hazardous waste ranged from 1.5 gallons to 10 gallons (References 34 and 38). The four remaining releases resulted from: an overfill of a drum in the solvent return fill shelter (10 gallons released); a strap, which was used to stabilize a drum, breaking (13.5 gallons of perchloroethylene were released); and a pump in the solvent return fill shelter would not shut off (20 gallons of D001 were released) (References 23, 24 and 38). In all of the above releases, the waste solvent was confined to concrete or pavement and was contained with either absorbent towels or oil dry. The releases did not reach soil or surface water, and the absorbent material was drummed and shipped to the Safety-Kleen Recycling Center in Lexington, South Carolina (References 23, 34 and 38).

C. ENVIRONMENTAL SETTING

Location and Surrounding Land Use

The Tampa Safety-Kleen facility is located in Hillsborough County, approximately two miles east of the northern portion of Tampa Bay, in an area known as East Tampa (see Fig. II-1 for facility location map). The facility is approximately three acres in size and is located at a latitude and longitude of 27°55'21"N and 82°23'40"W. The facility is bounded on the west by a Seaboard Railway System right of way and some light industry, and on the north, south, and east by fields and woodland (Reference 37).

Climate and Meteorology

The facility's address is listed as Tampa; however the climate and weather conditions for the city of St. Petersburg, Florida, were used as reference because of the facility's proximity to St. Petersburg, which is located approximately 20 miles northeast of Tampa.

St. Petersburg has a mean annual temperature of 73.60°F. The mean winter and summer temperatures are 62.73°F and 82.66°F, respectively. Mean annual precipitation is 53.10 inches, with June through September having twice as much rainfall as the remaining months. There is no recordable amount of annual snowfall. Prevailing winds in the Tampa/St. Petersburg area are southeast and east. Wind directions are influenced locally by conventional forces inland and by the land-and-sea-breeze-effects near the coast (Reference 37). Prevailing wind directions are somewhat erratic, but generally follow a pattern of north in winter and south in summer, with the windiest months being March and April.

Topography, Surface Drainage and Flood Plain

The Safety-Kleen facility is located at an average elevation of ten feet above sea level (Reference 41). There are no streams on site, and the distance to the nearest major body of surface water, which is the East Bay, is approximately a mile from the facility. Surface and stormwater

runoff from the facility's parking lot and service areas drain to the south via a long depression in the asphalt of the service areas. This runoff enters the Stormwater Ditch, (SWMU 7) south of the facility, then flows west to the facility's Stormwater Retention Pond (SWMU 12). The stormwater runoff evaporates and/or percolates into the soil and groundwater below the Stormwater Retention Pond (SWMU 12).

The Safety-Kleen facility lies outside the areas where previous studies of the 100-year flood plain have been conducted by the Federal Emergency Management Agency (FEMA), preparers of the National Flood Insurance Rate maps. Available FEMA flood plain maps for the land that lies directly north, northwest and west, show that these areas do not lie in the 100-year flood plain. The facility's Part B permit application stated that the facility was not inside the 100-year flood plain (Reference 40).

Geology and Soils

Hillsborough County is located in the west-central part of Florida. It is bounded on the south by Manatee County, on the east by Polk County, on the north by Pasco County and on the west by Pinellas County and Tampa Bay. Hillsborough County, is in the Floridan section of the Atlantic Coastal Plain, in an area known as the Coastal Lowlands (Reference 36).

The surface drainage in Hillsborough County is toward Old Tampa Bay, Hillsborough Bay, and Tampa Bay. Drainage is slow in the Coastal Lowlands, and is maintained by swampy areas and a few small streams which drain to the west toward the coast.

The soil unit that exists at the facility location is known as the Myakka-Basinger-Holopaw unit. This soil unit exists in areas that are nearly level. The soils are poorly-drained, and have a sandy or loamy subsoil or are sandy throughout. This soil unit typically has a surface layer of black or gray fine sand approximately five to seven inches thick. The subsurface layer is gray fine sand to a depth of approximately 20 to 28 inches. The upper part of the subsoil is black fine sand; the middle part is reddish-brown fine sand; and the lower part is brownish-yellow fine sand (Reference 36).

Groundwater

No site-specific studies of groundwater beneath the facility or in surrounding areas have been conducted; therefore, the information presented here is on a regional level. The west-central section of Florida is underlain by an aquifer system known as the Floridan Aquifer System. This system is composed of three hydrologically-connected units. The surficial aquifer is predominantly fine sand, interbedded with clay, marl, shell, limestone and phosphorite. Below this lies the intermediate aquifer and confining beds. The upper confining bed of this unit is made up of undifferentiated deposits, with the major component being clastic. The intermediate aquifer and lower confining bed is contained within the Hawthorn Formation and is mostly composed of dolomite, sand, clay and limestone. The general lithology of the

Floridan Aquifer, located below this Hawthorn Formation is limestone interspursed with sand chalk, fossiliferous sand, and dolomitic (near the lower unit). The lower confining unit for this aquifer system is composed of two stratigraphic units known as Lake City limestone and Oldsmar limestone, and below is the Cedar Keys limestone (Reference 43).

The base of the Upper Floridan Aquifer in west-central Florida is generally at the first occurrence of vertically-persistent, intergranular evaporites. Hydraulic tests of rocks with intergranular evaporites indicate that they have extremely low permeabilities. The rocks below the "middle confining unit" of the Floridan Aquifer System have an estimated low transmissivity so that freshwater flow is limited to rocks above the section, with intergranular evaporites, in west-central Florida (Reference 43).

The water levels and the quantities and patterns of flow in the Upper Floridan Aquifer and the overlying aquifers change in response to deviations from normal rainfall levels, natural recharge, and human activities including construction of withdrawal and recharge wells, impoundments and dredging. (Reference 43). The Tampa Bay area has the largest concentration of population in west-central Florida. A major portion of the area is underlain by a highly-permeable dolomite zone, which contains saline water and is not usable for municipal supplies. Large, inland municipal well fields are used to supply potable water.

These large well fields of the Tampa Bay area are characterized by relatively thin, confining beds with high-leakage valves, so the capacity for inducing additional large amounts of groundwater recharge, when the head difference between the Upper Floridan Aquifer and the surficial aquifer is increased, is great. Because of this head difference, moderate water-level declines occur in the Upper Floridan Aquifer well fields. These water-table head differences usually recover during the rainy season (Reference 43). Groundwater pumpage of the aquifer system in the Tampa Bay area is only one of the activities related to urban development that impact the flow of this aquifer. The construction of dams and levees, and impoundment of surface water in this low-lying area, as well as the construction of drain fields, canals and ditches, has also had an impact on the aquifer. General urban construction, which includes roads, borrow pits, parking areas and buildings, has played a large role, as well as the dredging in Tampa Bay to provide ship channels to access the bay and Gulf. The combination of the thick confining beds, urban development, and the large withdrawals of water from the Upper Floridan Aquifer in the area of Hillsborough County, has resulted in large declines in the potentiametric surface of the Upper Floridan Aquifer over a large area (Reference 43).

III. SWMU DESCRIPTIONS

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 1 PHOTO NUMBER: 1a, 1b and 1c

NAME: Service Center Drum Storage Area and Associated Trench

TYPE OF UNIT: Drum Storage

PERIOD OF OPERATION: 1986 to present

PHYSICAL DESCRIPTION AND CONDITION:

The Service Center Storage Area is a RCRA-regulated unit located inside a building. The unit is approximately 40 feet long by 30 feet wide, and is surrounded by a 4-inch-high concrete curb 6 inches wide. An 8-foot-high chain-link fence with 3 rows of barbed wire at the top surrounds the unit. The fence has a locking gate, and a containment trench, which is part of the unit's design, is located within the unit in front of the gate. The trench measures 12 feet long by 2 feet wide by 1 foot, 8 inches deep. The total capacity of this containment system equals one-tenth of the total capacity of 6,283 gallons that will be stored in this area. The concrete pad and curb are sealed with an epoxy coating. Drummed waste is stored in this unit between seven and a maximum of ten days. During the VSI, the epoxy-coated concrete floor and containment trench were in good condition. The drums of waste were positioned on wooden pallets in this unit.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste immersion cleaner, (F001/F005) (halogenated/non-halogenated solvents), Mineral Spirit Dumpster Mud (D001, D006, D008).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

Over the four-year operating period, two drums of waste solvent were found to have pinhole leaks. The amount of released solvent from both leaks equaled approximately three gallons. The releases were confined to the building, completely cleaned up, and no evidence of these releases are present.

RECOMMENDATION:
No Further Action (X)
RFA Phase II Sampling ( )
RFI Necessary ( )

REFERENCES: 22, 29 and 42

COMMENTS: The unit was observed to be in good condition during the VSI. It is located indoors and has secondary containment. Hence, the potential to all media was assessed as low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 2 PHOTO NUMBER: 2a

NAME: Drummed Dry-Cleaning and Paint Waste Unloading Dock

TYPE OF UNIT: Loading Dock

PERIOD OF OPERATION: 1986 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is located along the eastern side of the Service Center Building. The unit is constructed of cinder blocks that have been covered with concrete, and is approximately 18 feet long by 15 feet wide, narrowing to approximately five feet wide at its easternmost edge. The unit rises approximately two-and-one-half feet from the concrete pad on which the arriving trucks park while unloading drummed waste. Drummed dry-cleaning and paint wastes are unloaded from trucks with hand carts, and are stored in the nearby Service Center Drum Storage Area (SWMU 1) until being shipped to the Safety-Kleen Recycling Center.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Drummed dry-cleaning waste, F002 and D001 and paint wastes.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

According to the available file material, only a single release of five gallons of mineral spirits sludge occurred on this loading dock. The release was contained and cleaned up with absorbent towels. Stains and small cracks in the concrete were observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 22

COMMENTS: Although the unit was observed during the VSI to have minor staining and small cracks, the potential for release from this unit was assessed to be low. It is concrete and has secondary containment structures. The potential for release to all media is low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 3 PHOTO NUMBER: 3a

NAME: Solvent Return Wet Dumpsters (3)

TYPE OF UNIT: Temporary Liquid Waste Storage

PERIOD OF OPERATION: 1986 - present

PHYSICAL DESCRIPTION AND CONDITION:

These three wet dumpsters are positioned under a covered area, approximately fifty feet square, located between the facility's Service Center and Accumulation Center. The wet dumpsters are constructed of steel and are approximately four feet long by three feet wide by four feet deep. A metal grating is positioned across the opening of the dumpster. The grating is set approximately one foot from the dumpsters' open end. The dumpsters are covered with a hinged top. These wet dumpsters are positioned within a Spill Containment Area below the Fill Shelters (SWMU 4), and spills resulting from the transfer operation would be collected in that unit. The liquid wastes deposited in these dumpsters are pumped, via above-ground pipes, to the Waste Solvent Storage Tank (SWMU 6). Any sludge or mud which collects in the dumpster is drained, stored in the Service Center Drum Storage Area (SWMU 1) and shipped off-site for disposal.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

This unit manages waste mineral spirits, D001, D006, D008 that are shipped to the facility from customers in bulk form (tanker truck).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 15, 17, 19 39, and 42

COMMENTS: The unit was observed to be in good condition during the VSI. The transfer operations at this unit appeared to be well managed and wastes are not allowed to collect in the dumpsters. It is above-ground, located in a covered area, and has secondary containment. Hence, the potential for release to all media is low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 4 PHOTO NUMBER: 4a and 4b

NAME: Spill Containment Area Below the Fill Shelters

TYPE OF UNIT: Concrete Containment Area

PERIOD OF OPERATION: 1986 - present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is located below the fill shelters, which are located between the Service Center and the Accumulation Center. The unit is composed of two concrete pads with four-inch curbs. The pads are separated by a small cinder-block and cement walkway. The two curbed pads are approximately 25 feet square. Each pad has two sumps, placed approximately one-and-one-half feet from the wet dumpsters. (There are three wet dumpsters and four sumps.) These sumps are eighteen inches in diameter and two feet in depth. Should a release from the dumpster occur, the sumps would be manually pumped with the waste solvent being routed to the Waste Solvent Storage Tank (SWMU 6). The pad portion of the unit appeared to be in good condition. The condition of the sumps could not be assessed during the VSI, because they were filled with water. A heavy metal grating is located approximately two feet above the unit, which is used by facility personnel for greater access to the dumpsters.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirit, D001, and mineral spirit sludge.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:
No Further Action (X)
RFA Phase II Sampling ( )
RFI Necessary ( )

REFERENCES: 39 and 42

COMMENTS: The wastes managed in this unit are not corrosive/destructive to concrete. The total volume of wastes managed in the sumps is small and the containment area is designed to handle 110% of the total volume of waste managed in this area. Also, the sumps are relatively new units (less than five years old) and therefore do not require integrity testing. Hence, the potential for release to all media is low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 5 PHOTO NUMBER: 5a and 5b

NAME: Drum Rinsing Area

TYPE OF UNIT: Washing or Rinsing Area

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is located in the fill shelter area between the Service Center and the Accumulation Center. The unit is positioned on heavy metal grating above the Spill Containment Area below the Fill Shelters (SWMU 4). The unit consists of a whole, vertically-placed 55-gallon collection drum that holds mineral spirits, and a vertically-halved 55-gallon drum positioned horizontally on top of the whole 55-gallon drum. The halved drum serves as a washing container. 16-gallon and 30-gallon drums that contained waste mineral spirits are placed on their sides in the washing container. A spray/nozzle apparatus, attached to a small pump, brings the mineral spirits from the 55-gallon collection drum to the washing container, and the interior of the smaller waste drum is rinsed. The mineral spirit rinse, and any waste residue removed from the waste drum, are allowed to drain back to the collection drum. After several rinses, the spent mineral spirits from the collection drum are shipped off-site for recycling.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste Mineral Spirits, D001.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

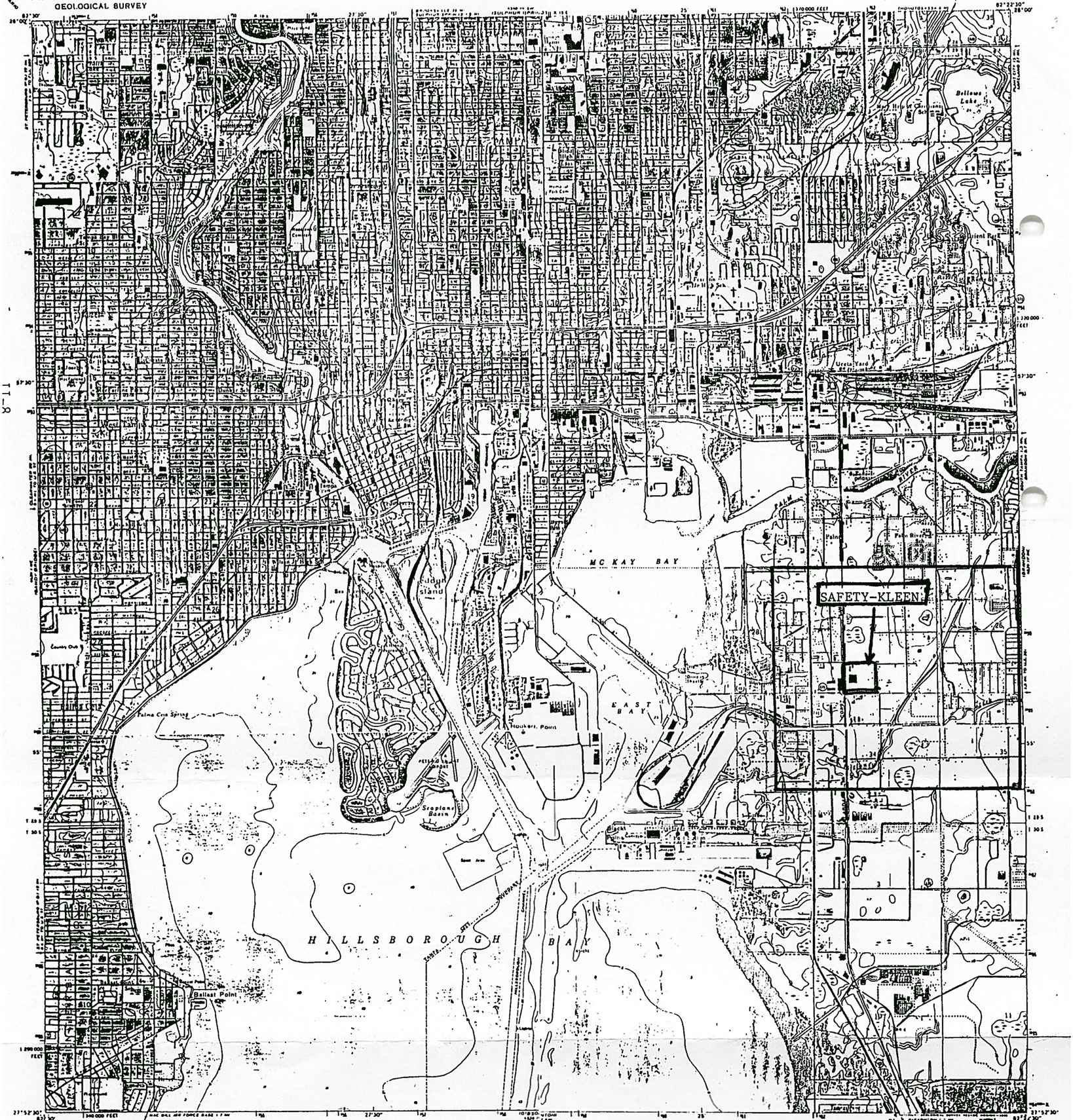
REFERENCES: 27, 39, and 42

COMMENTS: The potential for release to all environmental media is low because the unit has secondary containment and is not in continuous use.

FACILITY LOCATION MAP

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

TAMPA QUADRANGLE
FLORIDA - HILLSBOROUGH CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



Mapped, edited, and published by the Geological Survey

Control by USGS, NOS/NOAA and USCE

Culture and drainage in part compiled from aerial photographs taken 1954. Topography by planetable surveys 1956

Selected hydrographic data compiled from NOS chart 587 (1952)
This information is not intended for navigational purposes

Polyconic projection. 10,000 foot grid ticks based on Florida coordinate system, west zone. 1000-meter Universal Transverse Mercator grid ticks, zone 17, shown in blue. 1927 North American Datum. To place on the predicted North American Datum 1983 move the projection lines 25 meters south and 17 meters west as shown by dashed corner ticks

Red tint indicates areas in which only landmark buildings are shown

Revisions shown in purple compiled from aerial photographs taken 1979 and other sources. This information not field-checked

SCALE 1:24,000

CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET - GULF COAST LOW WATER DATUM
THE RELATIONSHIP BETWEEN THESE TWO DATUMS IS VARIABLE
SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER
THE MEAN RANGE OF TIDE IS APPROXIMATELY 2 FEET

UTM GRID AND 1983 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

Purple tint indicates extension of urban areas

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY
DENVER COLORADO 80225, OR RESTON VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

FLORIDA
QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy duty ——— Light duty - - - -
Medium duty ——— Unimproved dirt .....
Interstate Route U S Route State Route

TAMPA, FLA.
27082-H4-TF-024

1956
PHOTOREVISED 1981
DMA 4936 IV NW-SERIES V847

T1_R

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 6 PHOTO NUMBER: 6a, 6b, 6c and 6d

NAME: Waste Solvent Storage Tank

TYPE OF UNIT: Tank

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

This unit consists of one above-ground tank positioned on a metal frame. The unit is located west of the facility's fill shelters and two buildings. The diked area surrounding the tank is approximately 20 feet wide by 40 feet long by four feet high. The concrete pad and concrete-coated cinder-blocks that make-up the dike walls have an epoxy coating on them. The tank manages waste mineral spirit routed to the tank via three-inch overhead carbon steel pipes. The waste mineral spirit is from the facility's three Solvent Return Wet Dumpsters (SWMU 3). This tank has a 15,000-gallon capacity and the shell and thickness are specified as 1/4-inch hot-rolled carbon steel (H.R.C.S.) and the tank ends are 5/16-inch H.R.C.S. The tank's operating pressure is atmospheric and the operating temperature is ambient. The maximum height of waste solvent in the tank is 95 percent capacity and is monitored by a high-level alarm. No cracks or stains were observed in the diked area surrounding these tanks during the VSI. This is a RCRA-regulated unit.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste Mineral Spirits, D001, D006, D008.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 22, 31, 39, and 42

COMMENTS: The tank was observed to be in good condition during the VSI. It is RCRA-regulated and has secondary containment and a high level alarm. The potential for release to all environmental media is low.

Project Name: Safety-Kleen
Tampa Facility

Date: December 1, 1989

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 7 PHOTO NUMBER: 7a and 7b

NAME: Stormwater Ditch

TYPE OF UNIT: Earthen drainage ditch

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

The Stormwater Ditch is located between the facility's south service or delivery area and the facility's south fence. This ditch is a shallow unlined depression in the native soil and grass. Stormwater entering the ditch flows west to a Stormwater Retention Pond (SWMU 12).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

This unit receives stormwater runoff from all areas of the facility which do not have secondary containment. These areas include the Drummed Dry-Cleaning and Paint Waste Unloading Dock (SWMU 2) and the parking lot.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

There were no documented releases from this unit in the available file material. During the VSI, a large stain was observed in the east parking lot. This stain extends from the Dry-Cleaning and Paint Waste Unloading Dock (SWMU 2) to the Stormwater Ditch. According to the facility representatives, the stain was caused by a concrete cleaner, which contains no hazardous constituents according to the MSDS sheets provided by the facility.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 39, 42, and 23

COMMENTS: The potential for release to all environmental media is low because the facility practices good housekeeping. Spillage has been minimal, but when it occurred, it has been contained and cleaned up.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 8 PHOTO NUMBER: 8a and 8b

NAME: Accumulation Center Drum Storage Area and Associated Trench

TYPE OF UNIT: Drum Storage Area

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

This container storage area is located indoors in the facility's Accumulation Center (the southernmost of the two buildings present on the site), adjacent to the buildings' north and west walls. The unit is approximately 60 feet long by 40 feet wide. The concrete floor has an epoxy coating, as does the four-inch concrete curb located along the three edges of the unit that border the buildings' walls. A concrete containment trench, which is part of the unit's design, is located along the unit's fourth edge. The trench is approximately 60 feet long by two feet wide by 18 inches deep. Another containment trench, approximately 20 feet long, is located in front of the sliding doors that access this storage area to the outdoors. No cracks or stains were observed on this unit. This is a RCRA-regulated unit.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirits, D001, D006, D008; waste chlorinated solvent, F002 and F004; mineral spirit dumpster mud, D001, D006 and D008; waste halogenated solvents, F001 and F002; and paint wastes and non-halogenated wastes, F003 and F005.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 19, 39, and 42

COMMENTS: This unit is located indoors and has secondary containment. It was observed to be in good condition during the VSI and the potential for release to all media is low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 9 PHOTO NUMBER: 9a and 9b

NAME: Drummed Waste Loading Docks (3)

TYPE OF UNIT: Loading Dock

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

These three loading docks are located along the eastern wall of the Accumulation Center. The base of the units are composed of heavy steel plate that is placed in the concrete floor. The concrete floor that surrounds these metal plates has an epoxy coating. The fourth edge of the steel plate is welded to a smaller steel plate positioned vertically on the outside entrance to the loading docks. A secondary containment sump is located below each loading dock. The sumps are constructed of concrete and are approximately eight feet long by one foot wide by 18 inches deep. The sumps are bordered by the Accumulation Center's outside wall on two sides, and a three-inch concrete curb on the other two sides. The sumps are blind, and rainwater that collects in them is pumped out manually and collected in drums which are shipped to South Carolina for disposal.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Waste mineral spirits, D001 and D008; waste chlorinated solvent, F002 and F004; mineral spirit dumpster mud, D001 and possibly D006 and/or D008; waste halogenated solvents, F001 and F002; and paint waste and non-halogenated wastes, F003 and F005.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:
No Further Action (X)
RFA Phase II Sampling ( )
RFI Necessary ( )

REFERENCES: 39 and 42

COMMENTS: The sumps were observed to be in good condition during the VSI, and the potential for release to all media is low.

SWMU DATA SHEET

Page 1 of 1

SWMU NUMBER: 10 PHOTO NUMBER: 10a and 10b

NAME: Drummed Flammable Waste Storage Room

TYPE OF UNIT: Drum Storage Area

PERIOD OF OPERATION: 1986 - Present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is located indoors in the southwest corner of the facility's Accumulation Center. The unit is approximately 40 feet long by 30 feet wide. The two inner walls of this unit are constructed of cinder-blocks, and the two outer walls are composed of metal panels that would collapse "out" should an explosion occur. The floor and four-inch curbs along the two outer walls are constructed of concrete and have an epoxy coating. A trench, approximately 30 feet long by two feet wide by two feet deep, is located inside this unit in front of the unit's fusable-link door. The unit's door is weighted in such a way that, should an explosion or fire occur in the unit, the fuse would melt and the door would shut automatically. No cracks or stains were observed in the floor of this unit during the VSI.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Paint wastes and paint-related waste products.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 39 and 42

COMMENTS: The drums are stored indoors and the area has secondary containment. The potential for release to all media is low.

SWMU DATA SHEET

SWMU NUMBER: 11 PHOTO NUMBER: 11

NAME: Old Dumping Ground

TYPE OF UNIT: Land disposal

PERIOD OF OPERATION: This area was used as a dumping ground prior to 1986.

PHYSICAL DESCRIPTION AND CONDITION:

The unit consists of an area of approximately one acre near the western boundary of the property. At present the area is unused and was observed to be covered with vegetation. According to facility representatives, prior to 1986, this area was used for dumping household and office trash. Facility representatives also indicated that no hazardous wastes or chemicals were disposed of in this area although there was no documentation available to substantiate this. No additional information was available regarding the source of this waste or past ownership of the property.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Household and office trash including used furniture, washing machines, tires and other appliances were disposed of in this area.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (H)
Groundwater (H) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was noted in the file material and none was observed during the VSI.

RECOMMENDATION:

No Further Action	( )
RFA Phase II Sampling	(X)
RFI Necessary	( )

REFERENCES: 42

COMMENTS: No documentation regarding the actual use of this area prior to 1986 was available. The potential for release to soil and groundwater is high due to the unlined nature of the unit if hazardous constituents are present. The potential to release to all other environmental media is low.

SWMU DATA SHEET

SWMU NUMBER: 12 PHOTO NUMBER: 12

NAME: Stormwater Retention Pond

TYPE OF UNIT: Surface Impoundment

PERIOD OF OPERATION: 1986 - present

PHYSICAL DESCRIPTION AND CONDITION:

This pond is an unlined earthen pit approximately 100 feet long by 25 feet wide by six inches to one foot in depth. Run off from the Stormwater Ditch (SWMU 7) collects in this unit. Vegetation such as cattails and native reed grasses is prevalent in the pond.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

This unit manages stormwater runoff which collects in the Stormwater Ditch (SWMU 7) and flows into the Stormwater Retention Pond. The runoff originates from areas at the facility that have no secondary containment.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

RECOMMENDATION:

No Further Action	(X)
RFA Phase II Sampling	( )
RFI Necessary	( )

REFERENCES: 23, 39, and 42

COMMENTS: The facility appears to practice good housekeeping. Spillage has been minimal and when they have occurred, spills have been contained and cleaned up. Therefore the presence of hazardous wastes or hazardous constituents is unlikely and the potential for release to all environmental media is low.

IV. SUMMARY

TABLE IV-1

SOLID WASTE MANAGEMENTS UNITS

SWMUs

1. Service Center Drum Storage Area and Associated Trench
2. Drummed Dry-Cleaning and Paint Waste Unloading Dock
3. Solvent Return Wet Dumpsters (3)
4. Spill Containment Area Below the Fill Shelters
5. Drum Rinsing Area
6. Waste Solvent Storage Tank
7. Stormwater Ditch
8. Accumulation Center Drum Storage Area and Associated Trench
9. Drummed Waste Loading Docks (3)
10. Drummed Flammable Waste Storage Room
11. Old Dumping Ground
12. Stormwater Retention Pond

Table IV-2

SOLID WASTE MANAGEMENT UNITS
REQUIRING NO FURTHER ACTION

SWMU No.	SWMU Description
1	Service Center Drum Storage Area and Associated Trench
2	Drummed Dry-cleaning and Paint Waste Unloading Dock
3	Solvent Return Wet Dumpsters (3)
4	Spill Containment Area Below the Fill Shelters
5	Drum Rinsing Area
6	Waste Solvent Storage Tank
7	Stormwater Ditch
8	Accumulation Center Drum Storage Area and Associated Trench
9	Drummed Waste Loading Docks (3)
10	Drummed Flammable Waste Storage Room
12	Stormwater Retention Pond

Table IV-3

SOLID WASTE MANAGEMENT UNITS
THAT ARE RCRA-REGULATED UNITS

SWMU No.	SWMU Description
1	Service Center Drum Storage Area and Associated Trench
6	Waste Solvent Storage Tank
8	Accumulation Center Drum Storage Area and Associated Trench

Table IV-4

SOLID WASTE MANAGEMENT UNITS
REQUIRING PHASE II SAMPLING

SWMU No.	SWMU Description
11	Old Dumping Ground

V. SUGGESTED SAMPLING STRATEGY

No.	Unit Name	Dates	Suggested Sampling	Evidence of Releases (Yes/No)
11	Old Dumping Ground	Prior to 1986	Soil sampling is suggested to determine the presence of hazardous waste or hazardous constituents. Surface and sub-surface soil samples should be collected from areas where dumping has been suspected or where wastes may have been stored. Samples should be analyzed for Appendix IX constituents.	No

VI. REFERENCES

1. Letter from John P. Labman, U.S. EPA, to Theodore H. Mueller, Safety-Kleen Corporation, regarding concerns of clarifications or modifications of regulations. Date Received: July 21, 1981.

2. Solvent Sample Analysis - Summary Report. Dated: October 24, 1984.

3. Application For a Hazardous Waste Facility Permit. Dated: June 28, 1985.

4. RCRA Part A Application. Dated: July 3, 1985.

5. Conversation Record. Dated: November 1, 1985.

6. Material Safety Data Sheets and Attachments. Dated: November 6, 1985.

7. Letter from Stanley A. Walczynski, P.E., (Regional Environmental Engineer) to Satish Kastury, FDER, regarding facility operations. Dated: February 11, 1986.

8. Letter from Raoul Clarke, FDER, to Stanley A. Walczynski, P.E., regarding schedule of Safety-Kleen permit applications. Dated: May 1, 1986.

9. Laboratory Analysis Sheet of Safety-Kleen waste by KDM Company. Dated: May 21, 1986.

10. Letter from Robert W. McVety, FDER, to James H. Scarbrough, U.S. EPA, regarding Safety-Kleen's problems with waste storage prior to recycling permit requirements. Dated: June 10, 1986.

11. Letter from Armando Gonzalez, FDER, to Ellen J. Jurczak, Safety-Kleen, regarding a construction permit and an extension to respond to first N.O.D.s. Dated: July 18, 1986.

12. Letter from Armando Gonzalez, FDER, to Ellen J. Jurczak, Safety-Kleen, regarding a construction permit application and a second N.O.D. Dated: August 25, 1986.

13. Letter from Armando Gonzalez, FDER, to Ellen J. Jurczak, Safety-Kleen, regarding a construction permit application and additional information about the N.O.D.s. Dated: September 23, 1986.

14. Letter from Armando Gonzalez, FDER, to Ellen J. Jurczak, Safety-Kleen, regarding a construction permit application and a third N.O.D. Dated: October 2, 1986.

15. Letter from Armando Gonzalez, FDER, to Ellen J. Jurczak, Safety-Kleen, regarding a construction permit application and responses to a fourth NOD. Dated: November 7, 1986.

16. Waiver of 90-Day Time Limit. Dated: September 29, 1986.

17. Letter from Safety-Kleen to FDER regarding spill at the facility. Dated: November 18, 1986.

18. Letter from Ellen J. Jurczak, Safety-Kleen, to Armando Gonzalez, FDER, regarding construction permit application. Dated: December 11, 1986.

19. Letter from Safety-Kleen to FDER regarding disposal of dry-cleaning filters. Dated: February 19, 1988.

20. This reference was deleted because it related to the Safety-Kleen facility located at Manhattan Avenue.

21. Letter from Armando Gonzalez, FDER, to Gordon and Bonnie Burman, Safety-Kleen, regarding construction of a Hazardous Waste Tank and Container Storage Facility. Dated: June 30, 1988.

22. Draft permit from FDER to Safety-Kleen, pertaining to the construction of a hazardous waste tank and container storage area. Not Dated.

23. Letter from Paul Pederson, Safety-Kleen, to James H. Scarbrough, U.S. EPA, regarding additional SWMUs and releases. Dated: July 25, 1988.

24. Application for a Hazardous Waste Facility Permit. Dated: August 25, 1988.

25. Part A Application. Dated: September 1, 1988.

26. Notice of Permit from Armando Gonzalez, FDER, to Gordon and Bonnie Burman, Safety-Kleen. Permit for construction of a Hazardous Waste Tank and Container Storage Facility. Dated: September 28, 1988.

27. Hazardous Waste Inspection Report. Dated: October 18, 1988.

28. RCRA Inspection Report - Land Ban Checklist for Generators. Dated: October 18, 1988.

29. Information Regarding Potential Releases from Solid Waste Management Units. Dated: November 7, 1988.

30. FDER Interoffice Memorandum regarding RCRA Closure Permit Application and Supporting Documents for Safety-Kleen. Dated: January 12, 1989.

31. Letter from Rob Omiecinski, Safety-Kleen, to Armando Gonzalez, FDER, regarding the design installation plan for Safety-Kleen's above-ground hazardous waste storage tank system.

32. Safety-Kleen Field Spill Report Form. Dated: July 12, 1989.

33. Safety-Kleen Description of Business Activity. Undated.

34. Information Regarding Potential Releases from Solid Waste Management Units. Undated.

35. Exhibits from unknown document. Undated.

36. Soil Survey of Hillsborough County, Florida; United States Department of Agriculture, Soil Conservation Service.

37. Climates of the States, Third Edition Volume 1, Gate Research Company, Detroit, Michigan.

38. Safety-Kleen Corp. Spill Report Forms, obtained during VSI.

39. VSI Field Log. Dated: October 2, 1989.

40. Part B Application. June 1986.

41. United States Department of the Interior Geological Survey 7.5-Minute Series Topographic map; Tampa Quadrangle.

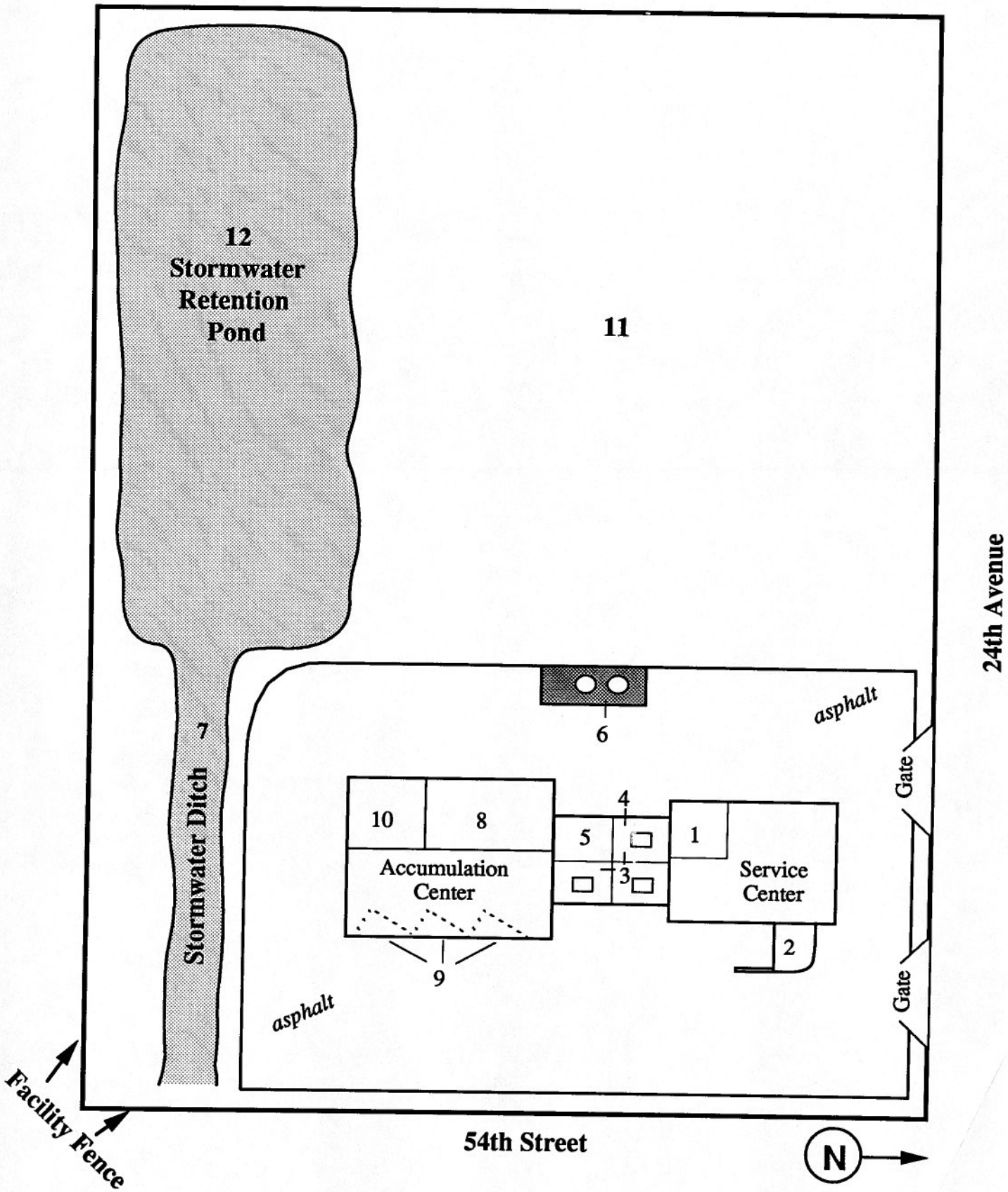
42. Visual Site Inspection conducted by Rajesh Aji - A.T. Kearney and Gail Carter - Kearney/Centaur. Date: October 2, 1989

43. Hydrology of the Floridan Aquifer System in West-Central Florida by Paul Ryder; U.S. Geological Survey Professional Paper 1403 F; 1985..

APPENDIX A

SWMU Location Map

SWMU Location Map For Safety-Kleen



References 40 and 39

Not to scale

1.813-uk

APPENDIX B

VSI Log Book

Property of A.T. Kearney, Inc.
Kearney/Centaur
Address 225 Reinekers Ln
Alexandria, VA 22314
Telephone 703/548-4700

INDEX (3)

Safety-Kleen Corporation
Tampa, Florida

EPA ID No. FLD 980 847 271

Unit Name
Dimensions/Capacity
Material of Construction
Year Operational
Wastes managed - type
- where from (wastes)
- where to
Release controls
Release History
when
How
How much waste released
Clean-up of waste.

Date: October 2, 1989

Entered the Facility at 9:00 Am

Weather Conditions:
Sunny
warm 80-85
Clear
Wind 5-7 knots.

Entered at Building

for opening meeting.

Facility Representatives:

JC

Participates at the opening meeting:

Gail Carter	Kearney/Centaur
Rajesh Aji	A.T. Kearney
Hugh Hazen	USEPA
William C. Hennes	State of Florida (FLDEP) Talla.
Paul ~~Patterson~~ Pederson	Elgin, IL Safety Kleen
Frank ~~Refer~~ Taylor	Safety-Kleen
Jim Davis	Accumulation Carter
Dave Galaway (Frank's ~~Assistant~~)	

Arrived later —
Debra Rehme - Tampa Rep. State.

Photos:

9:08 Rajesh Intro meeting

RFA Process
40 CFR
Appendix 9
Releases from all SWMU's.
RFA Process = Part B Process.
HWSA Permit

1. Preliminary Review
2. VSI - units.
3. RFA —

SWMU's at Facility

Letter Legend

HC.

Operations

Sale - Service
Paint Thinner
Solvents
Closed - loop system
Solvents leased to customers
picked up
Sent to Recycling unit
in Lexington, S.C

Paint Thinners : Refinishers.
Dry Cleaning
Parts Washer. or Cleaner Dist.

Waste Solvents 70% solvent recovered.

Sludge - distilled
Safety - Therm
Burns off useable 5%
Outs - Kiln
Dry Sludge - Tested.
Solids - Landfilled or
Blended as solid Fuel
GSX - Pinewood S.C

Recycled Solvent will be added to waste solvent so the facility has a full Truck-load of solvent to go to the Recycling Fac at: Lexington S.C.

Storage
Transporter
Generator

Facility opened 1986. June 30
Previous land use –
Some dumping of tires & trash
basically an open field.

- Facility lies outside of any previous studies conducted by Fed Env. Man. Agency.
NFIR

Southwest Florida Water Management.

John Huhurt.

GC

2 Tanks -
North Tank Farm - 2 Tanks
South Tank Farm - never been used.

South Building - Accumulation Center.
North Building - Service Center.

~~Enviropacts~~

Enviropact - tests stormwater from diked area for contamination.

Part B - submitted 1985

No operating permit at this time.

No other permits.

JC

Stormwater pond drains to the road drains - no concrete pipes - soil trenches or drainst visual

Qualitative test is done on the waste

Photo: 1: 10 am
Service Center
Drum Storage Area in the Service Center Area.

Photo 2: Trench in Drum Storage Area -
Trench located in front of gate.

Photo 3: Drums in Storage Area

10:00 am Tour of facility -

* Service Center - A on Map.
Drum Storage Area
Used Immersion Center -
Sludge from wet dumpster also stored here.
Waste from Dry Cleaner

D001 ~~D00~~ mineral spirits.
F002 cor.
~~F00~~ ~~paint~~ gr.

Storage less than 10 days.

Blind Sump - manually pumped.
obs -
Drums on metal & wooden pallet.
Epoxy lined floor. in good condition
Drums stacked 1, 2, & 3 high with no pallets in between.

Drums in good condition
No visual evidence of releases.

of
GC

10:10.

Photo: 4 Well - Facing NE.

Releases - 2 releases of approximately 5 gallons - Releases contained w/absorbent towels - drummed and sent to the Recycling Center in Longforth.

Fence - Eight foot locking chain-link fenced with 3 rows of barbed wire surrounds this unit - within the Building or Service Center.

SC

Photo 5: North 10:10
Drum unloading area
Dry Cleaning &
Paint Related waste.

Photo 6: Southeast
Stains on asphalt
leading from loading dock
to driveway area

Low lying area in
Parking lot of facility
Driveway leads to a
on storm water collection
pond.

#
In Loading Dock - B

Dry Cleaning waste drums
& Paint Related waste drums.

Drums on Pallets -
Pallet hand cart or small
hand cart used.

Dimensions of Loading dock
18 x 15 sloping to 6 at
eastern edge.

OBS -
Some rust stains
& a few small cracks.
no diking along edge.
Surrounded by facility
parking lot or driveway.

SC

Photo 7: 10:13 Wet Dumpster

Photo 8: Overview of area.

Photo 9: Sump below Fill Shelter / Wet Dumpsters.

* Fill Shelter - Wet dumpsters -

Wet Dumpter
3 x 4 x 14 feet deep.

Steel -
1986 begin operation

Parts washing solvent.
Drums from customers are dumped here

* Metal Grated area
50 x 25 feet -
Dyked concrete area below this 3-4 inch curb.
Sump - Blind - 2 feet.
If a spill should occur it would be ~~manually~~ piped to the waste solvent storage tank.

→

SC

Waste Solvent is pumped to the Waste Solvent Storage Tank - via carbon steel pipes 2" fitting back welded. overhead fed waste solvent.

Strainer cleared daily -

Sludge cleared out as necessary.

Divisions within wet dumpsters so sludge does not get pumped out with the waste solvent.

Orange line - clean solvent

Brown line - waste solvent.

SC

Photo 10: 10:30
Facing South -
North Tank Farm.

Photo 11: Southwest
Overview of Tanks

Photo 12: West -
Tanks and assoc.
piping.

Tanks have
high level alarms -
level gauge.

Tanker loading/unloading area.

* Southern Tank - Clean Solvent.
North Tank - Waste Solvent.

Surrounded by a 4 foot
Concrete dike.

2 - 15,000 gallon tanks.
positioned on a metal form.

dike has epoxy coating -

Release - June 1986 -
tank was being filled with
clean solvent.
Gasket not fitted correctly.

3" Carbon steel lines feed these
tanks.

Obs - dike inside & out in
good condition.
no rust or cracks.

MC

10:35

Photo 13: Hook-up lines within diked area.

Photo 14: facing Northwest Old Tanks from other facilities within Florida Tanks have been cleaned out.
2 tanks
3 old wet dumpsters.

Photo 15: drainage ditch looking east from Containment Pond.

Photo 16: Stormwater Detention Pond.

Hookup piping for the Tanker Trucks #15 positioned within the diked area.

Stormwater Retention Pond - aground with cattails. some fish within pond - very shallow.

100 X 25 feet - 6 inches to 1 foot deep.

yc

Photo 17: Septic Field

Photo 18: Pumping Station/ Lift Station — flows by gravity to this area then gets pumped to the field.

* Septic Field west from the North Tank Farm. —

approx.: 25 X 50 feet.

Build-up drain field because water table is so low.

Facility 3½ acres - surrounded by a 8 foot high fence w/ 3 rows of barbed wire.

JC

Roll 2 —

Photo 19: Drums in Acc. Area NW — 10:50

Photo 20: Sump with Acc. Area in front of Door.

Photo 21: Tanker (Waste) Waste Loading Area

* — Accumulation Service Center — epoxy floor.

Storage of Haz Waste.
Freon
Mineral Spirits

Unload trucks —
Relabel —

Safety Kleen
Wastes from other Service Centers throughout Florida Collected Here — Relabeled and sent to the Lexington S.C. Recycling Center.

Blind Sumps — in front of Building loading unloading area. 2 feet wide
2½ deep.
15 feet

One long trench separates the drum storage area from the loading area.

SC

Photo 22: Sumps outside of Waste Drum loading area

Floor - in good condition - No cracks or stains.

Sumps. ~~on~~ outside of Drums into st. loading

Sumps approx. 8 feet by 1½ feet by 2 feet deep

Sump - blind. Surrounded by 2½ inch curb.

Rainwater drummed & sent to Lexington. SC.

Sump to be pumped or drained as necessary.

Good Conditioned.

MC

Photo: 23: Drums with Flammable waste Storage Area.

Photo: 24: Sump along wall of Flammable waste Storage Area.

Waste Flammables-

Room approx. 40 X 30 epoxy lined floor- with sump in-floor along

Paint Thinner - Foot & Clean Product - Carbator Cleaner (Creosol)

Drums on wooden pallets. Stacked 1 to 4 high.

also stored here.

OBS - Floor in good condition - no cracks or stains.

KC

Photo 25: Containment pond overfill area.

Releases - 1 to 2 gallons clean product release -

If a spill should occur it is cleaned within absorbate towels drummed & sent to Lexington Salvage. drums are located within area -

Two walls concrete cinder-block

Two walls are panels that would collapse - at shold an explosion occur

Door on this unit is fusable link
Door weight - fuse melts - door would shut. equipment
~~equipment~~ all explosion proof

AC

Facility Tour ended 11:15

Back to Service Center Office — going over blue prints & part B —

Release Reports —
Received during VSI
Service Center:
Accumulation center —

Facility Phone
(813) 626-1203 —

Left facility grounds at 12:00 noon

Potable water
Environmental Engineering
Health Dept.
272-6320
Ken-Rech

Photo: 26 & 27 Drum washing unit.
11:35 —

Gail Cutti

APPENDIX C

Photograph Log

Photo 1a. Service Center Drum Storage Area (SWMU 1)

Photo 1b. Containment trench located in front of the Service Center Drum Storage Area (SWMU 1) gate.

Photo 1c. Drums of waste within the Service Center Drum Storage Area (SWMU 1). The drums were positioned on wooden pallets and the epoxy-coated floor was in good condition. Note height of stacked waste drums.

Photo 2. A view of the Drummed Dry Cleaning and Paint Waste Unloading Dock (SWMU 2), facing north. Note stains on the concrete pad below the loading dock.

Photo 3. View of an open Solvent Return Wet Dumpster (SWMU 3).

Part of RFA Report - from A.T. Kearney - Report Dated 12/1/89.

Photo 4a. Overview of the facility's solvent return fill shelters. The Solvent Return Wet Dumpsters (SWMU 3) are located here, and the Spill Containment Area Below the Fill Shelters (SWMU 4) can be seen beneath the metal grate platform.

Photo 4b. This sump is located in the Spill Containment Area below the Fill Shelters (SWMU 4).

Photo 6a. Overview of the Waste Solvent Storage Tank area (SWMU 6), facing south. Note overhead piping to the tanks from the fill shelters.

Photo 6b. Close-up of the product tank and the Waste Solvent Storage Tank (SWMU 6).

Photo 5a. Overview of the Drum Rinsing Area (SWMU 5). The drum-washing apparatus is the 55-gallon drum that has a halved 55-gallon drum positioned lengthwise over it. This area is located above the Spill Containment Area Below the Fill Shelters (SWMU 4).

Photo 5b. Close-up view of the Drum Rinsing Area (SWMU 5).

Photo 6c. Epoxy-coated concrete pad and cinder-block dike that surround the Waste Solvent Storage Tank area (SWMU 6). This view is facing south.

Photo 6d. The tanker truck hookup pipes and valves for waste solvents (brown pipe, to the right) and clean solvents (orange pipe, to the left). These pipes are used for transferring solvents to and from a tanker truck.

Photo 7. View of the Stormwater Ditch (SWMU 7), facing east. The chain-link fence to the right is the facility's southern border.

Photo 8a. The Accumulation Center Drum Storage Area (SWMU 8).

Photo 8b. Trench located in front of the Western doors within the Accumulation Center Drum Storage Area (SWMU 8).

Photo 9a. Two of the three Drummed Waste Loading Docks (SWMU 9). The third loading dock is to the right, just outside this photo. The floor is epoxy-coated in this area.

Photo 9b. This sump is located outdoors within one of the Drummed Waste Loading Docks (SWMU 9). The other two loading docks also have sumps positioned in similar layouts.

Photo 10a. The Drummed Flammable Waste Storage Room (SWMU 10). All drums were positioned on wooden pallets. Note that drummed waste to the left is stacked four drums high.

Photo 10b. Trench within the Drummed Flammable Waste Storage Room (SWMU 10). This trench is positioned in front of the sliding door to the Drummed Flammable Waste Storage Room (SWMU 10).

Photo 11. View of the Old Dumping Ground (SWMU 11), facing north.

Photo 12. View of the Stormwater Retention Pond (SWMU 12), facing west. Tall grass and cattails are growing in this pond.