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October 3, 2000

Mr. Jim Ayers
FL DEP – Southeast District
400 N. Congress Avenue
P.O. Box 15425
West Palm Beach, FL 33416

**Re: Minor Permit Modification
Safety-Kleen Systems, Inc. – Medley, FL Facility
EPA ID #: FLD984171694
Permit #: HO 13-307336**

Dear Mr. Ayers:

Pursuant to the requirements found at 40 CFR 270.42(a)(1)(i), please allow this correspondence to serve as the Safety-Kleen Medley facility's formal request to the Department for a Minor Permit Modification.

I. Summary of the Modification

Safety-Kleen Medley is providing the following information for its permit modification:

1. A text description of its Continued Use Program for incorporation into the facility's June 1997 RCRA Part B Hazardous Waste Permit Renewal Application. This information will be identified as pages 2-9 and 2-10.
2. A copy of the FL DEP October 25, 1999 Continued Use Program concurrence letter for incorporation into the facility's Renewal Application. This information will be identified as pages 2-11 through 2-14.
3. A copy of the Safety-Kleen Medley Continued Use Program Standard Operating Procedure (SOP) for incorporation into the facility's Renewal Application. This information will be identified as pages 2-15 through 2-71.
4. A revised Table of Contents Page i for incorporation into the facility's Renewal Application.
5. Three revised facility drawings (showing the installation of the Continued Use dumpster) for incorporation in the facility's Renewal Application. These revised drawings include Figure 5.6-4, Figure 9.3-1, and Figure II.C.7-3 (found in Appendix C).

II. Information Required by 40 CFR 270.13 through 270.21, 270.62 and 270.63

Under 40 CFR 264 - Subpart I, owner(s)/operator(s) of container storage units are required to perform the following: maintain containers in good condition, use containers that are compatible with the waste contained, maintain closed containers unless adding or removing waste, inspect

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containers at least weekly, provide adequate aisle space for containers, and maintain secondary containment for containers in storage. Under 40 CFR 264 - Subpart J, owner(s) and operator(s) of tank systems are required to perform the following: maintain proper design and installation of the units, provide for adequate secondary containment and detection of any releases, appropriately respond to any releases, provide adequate measures in order to prevent over-filling the tank(s), and inspect the tank system at least daily when in use. Please be advised that changes in the physical, general operating and/or performance parameters established under 40 CFR 264 - Subparts I and/or J will not be needed in order to incorporate the minor RCRA permit modification described herein.

A. Appropriate 40 CFR 270.13 through 270.21 Information/Data

This minor permit modification does not require revision of any other information previously submitted to the Department under 40 CFR 270.13 through 270.21. Changes in the facility's physical, general operational and/or performance parameters, including permitted storage and/or treatment capacity, and revisions to any plans (e.g., Waste Analysis Plan, Contingency Plan and/or Closure Plan) are not required in order to implement this modification.

B. Appropriate 40 CFR 270.62 Information/Data

The incinerator standards under this regulation do not apply to this facility's permit modifications.

C. Appropriate 40 CFR 270.63 Information/Data

The land treatment standards under this regulation do not apply to this facility's permit modifications.

III. Notice to Facility Mailing List

In accordance with 40 CFR 270.42(a)(ii), S-K will provide notification of this RCRA permit modification to the facility's mailing list, if required by the Department. This notification will be performed within the ninety (90) calendar days specified by the above referenced regulation, if deemed necessary.

IV. Conclusion

Please find enclosed a check for \$500.00 made payable to the Florida Department of Environmental Protection for the processing of the Safety-Kleen Medley minor permit modification (\$250.00) and the accompanying Safety-Kleen Boynton Beach minor permit modification (\$250.00). Any correspondence concerning this matter should be addressed to Mark Hicks or Scott Schneider at the

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following address:

Safety-Kleen Systems, Inc.
8755 NW 95th Street
Medley, FL 33178

Thank you for the Department's time in addressing this matter. If you have any questions or need additional information, please contact me at (561) 736-2267.

Sincerely,

A handwritten signature in black ink that reads "Scott A. Schneider". The signature is written in a cursive, flowing style.

Scott A. Schneider
Environmental, Health & Safety Manager

Enclosures

cc: S-K Medley RCRA Part B Permit Renewal Application
Branch 999 File 1020