

## Thursby, Kim

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**From:** Curtis, Jeff [Jeff.Curtis@safety-kleen.com]  
**Sent:** Thursday, October 20, 2011 1:59 PM  
**To:** Russell, Merlin  
**Cc:** Thursby, Kim  
**Subject:** RE: E post Email Response Not Received

Merlin, I did receive the e-mail. I apologize for not responding earlier as I thought I had done so.

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)  
[www.safety-kleen.com](http://www.safety-kleen.com)

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**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Thursday, October 20, 2011 11:22 AM  
**To:** Curtis, Jeff  
**Cc:** Thursby, Kim  
**Subject:** FW: E post Email Response Not Received

Jeff, please let Kim know if you received this document. Thank you.

merlin

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).*

**From:** Thursby, Kim  
**Sent:** Thursday, October 20, 2011 10:43 AM  
**To:** Russell, Merlin  
**Subject:** E post Email Response Not Received

Merlin,

I sent the above document through e post email on October 10, 2011 and as of today I have not received a response back from them. I sent it to [Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com). Can you please contact them to see if they received the e post and let me know?

Thanks,  
Kim



Kim Thursby  
Department of Environmental Protection  
2600 Blair Stone Road

Mail Station 4560

Tallahassee, Florida 32399-2400

Direct with voice mail (850) 245-8792

Fax Number (850) 245-8810

**Thursby, Kim**

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**From:** Epost HWRS  
**Sent:** Monday, October 10, 2011 2:43 PM  
**To:** 'Jeff.Curtis@Safety-Kleen.com'  
**Cc:** Bahr, Tim; Dregne, James; Echevarria, Edgar; Honey, Kelly; Russell, Merlin; Tripp, Anthony  
**Subject:** Safety-Kleen Systems, Inc.-Tampa, FLD 980 847 271,  
**Attachments:** 10-10-11-Safety Kleen Tampa permit application completeness letter.Receipt.pdf

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](mailto: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.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

October 10, 2011

**Sent Via E-mail**

[Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)

Mr. Jeff Curtis  
Safety-Kleen Systems, Inc.  
5309 24th Avenue South  
Tampa, Florida 33619

Subject: Safety-Kleen Systems, Inc. FLD 980 847 271, Operating Permit No. 34744-HO-005, Hillsborough County

Dear Mr. Curtis:

Your August 5, 2011 revisions to your application for a hazardous waste permit have been reviewed and found to be substantially complete. There are a few remaining issues, most of which were discussed or resolved with you on Friday, October 7.

A contingency was not included in your cost estimates. Simply resubmit an update that includes a 15% contingency (NOD Comment 33).

It came to our attention during a recent inspection that there is a septic tank and drainfield on the property. These are considered Solid Waste Management Units (SWMUs). In our discussion on October 7, you told me that you were already in the process of completing the information required by Parts P and Q of the permit application for these units. As agreed upon, this SWMU will be considered SWMU-21. You also indicated that a tagging figure for Subpart BB requirements was being drafted and will be submitted.

A couple of pages were missing from the hard copy. Please submit the revised pages:

- ✚ Comment 14: A copy of the revised page (regarding management of used oil) was missing from your response.
- ✚ Comment 18.12: A copy of the revised page (regarding waste generated from cleaning the wet dumpsters) was missing from your response.

Although we have no objection to your proposed 24-hour timeframe for loading/unloading trucks and vehicles, you may want to re-evaluate the timeframe. In

Mr. Jeff Curtis  
Page 2 of 2  
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order to accommodate holidays and weekends, we have no objection to allowing up to 72 hours, similar to what we have allowed for other facilities (NOD Comment 18.9).

There have been recent occurrences of Safety Kleen accepting wastes that have been mis-profiled. At a minimum, Safety Kleen's sales personnel and chemists must receive adequate training to ensure that they are qualified to ensure that waste profiles are accurate and complete (NOD Comment 19.3).

Note that the federal laws do apply to Safety Kleen although they do not appear to be applicable at this time (Comment 20).

We suggest that page 94 (or elsewhere) be updated and include the statement that Safety Kleen has a policy in place that all spills greater than one cup are reported within an internal database (Comment 30).

For planning purposes, I have already started drafting your renewal permit. I intend to send you a courtesy copy of the draft permit for your review and comments in November. The Intent to Issue is scheduled no later than December 18, 2011.

If you have any questions, please call me at 850-245-8796 or  
[merlin.russell@dep.state.fl.us](mailto:merlin.russell@dep.state.fl.us)

Sincerely,



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

MR/mdr  
cc via e-mail:

Jim Dregne, FDEP Tampa, [James.Dregne@dep.state.fl.us](mailto:James.Dregne@dep.state.fl.us)  
Edgar Echevarria, FDEP Tallahassee, [Edgar.Echevarria@dep.state.fl.us](mailto:Edgar.Echevarria@dep.state.fl.us)  
Kelly Honey, DEP Tampa, [Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)