

Part II**Q. INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS**

Part II.Q. of the Florida Department of Environmental Protection's (FDEP's) Application for a Hazardous Waste Permit outlines the information requirements for solid waste management units (SWMU's) at the facility. This section provides the required information.

On October 30, 1991, the facility received a HSWA permit exemption from Region 4 of the USEPA. The HSWA permit (Permit No. FLD980847271) expired on October 30, 2001 and all HSWA corrective action conditions were incorporated into the state permit issued on 11/23/2001.

Fifteen SWMUs were identified at the facility in the RCRA Facility Assessment dated December 1, 1989 and in the previous permit issued by FDEP (34744-HO-005). They are listed below along with 5 SWMUs identified in discussions with the Department on June 8, 2011, and #21-Facility Septic System/Drainfield identified during a Department inspection in August, 2011 for a total of Twenty-one SWMUs:

SWMU NUMBER	DESCRIPTION
1	Service center drum storage area and associated trench
2	Drummed dry cleaning and paint waste unloading dock
3	Solvent return wet dumpsters
4	Spill containment area below the fill shelters
5	Drum rinsing area
6	Waste solvent storage tank
7	Storm water ditch
8	Accumulation center drum storage area and associated trench
9	Drummed waste loading dock (3)
10	Drummed flammable waste storage room
11	Old dumping ground
12	Storm water retention pond
13	Antifreeze tank
14	Used Oil filter containers
15	Empty used oil filter containers
16	Fluorescent bulb/bulbs & Mercury Device storage area (inside SWMU #10)
17	Non-Flammable Transfer Waste Area (inside SWMU #8)
18	Flammable Waste Transfer Area (inside SWMU #10)
19	Satellite Container Area (inside SWMU #3)
20	Less than 90-day Waste Storage Area (inside SWMU #10)
21	Facility Septic System/Drainfield

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Hazardous Waste Regulation

SWMU 21 – Facility Septic System/Drainfield is located slightly northwest of the tank farm as shown in Figure Part II - Q. The septic tank is comprised of two chambers. The eastern chamber is approximately 4 ft. by 8 ft. (longer in the east-west direction) by 5.25 ft. Deep. The western chamber is approximately 4 ft. by 4 ft. by 5.25 ft. deep. Both chambers are constructed of approximately 4-inch thick concrete. A lid is located on top of both chambers. A 6-inch diameter PVC cleanout pipe is located to the east of the septic tank. Septage enters the eastern chamber of the tank where any settling can then occur. Piping along the western wall of the eastern chamber allows liquid to flow into the western chamber once a certain level has been reached in the first chamber. Similarly, once a level is reached in the second chamber, liquid flows to the drain field. The internal piping is 2-inch diameter PVC. Since the issuance of the last operating permit SWMU No. 13, Antifreeze tank, has been removed and is no longer present at the facility. The last permit (34744-HO-005) indicated that no remedial corrective action is required at the facility.

Part II

S. AIR EMISSION STANDARDS

AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

The requirements of 40 CFR 264 Subpart BB – Air Emission Standards for Equipment Leaks apply to certain equipment associated with the used parts washer solvent storage tanks system. Figure 2.2-5 plots the facility layout with the location of the hazardous waste management units that utilize equipment subject to Subpart BB. Equipment subject to Subpart BB requirements is included in the “tank storage waste management area” area shown in Figure 2.2-5. This equipment contains or contacts hazardous wastes with VOC concentrations > 10% by weight. The Subpart BB requirements apply to pumps, valves, flanges, etc., which are part of the used parts washer solvent storage tank system. Figure 11.1-1 shows the specific equipment items, which are considered to be in “heavy liquid service” for the purposes of Subpart BB. Compliance with the applicable sections of 40 CFR 264.1052 thru 1063 has been achieved by the implementation of the procedures outlined in Appendix D and other procedures detailed below.

Implementation Schedule

All facilities subject to these regulations were required to be in compliance by the date specified in the final rule. This facility has been in compliance since that date (see Appendix D).

Schedule and Procedures For Inspections

Pursuant to Subpart BB of 40 CFR Part 264 and 40 CFR 270.25, Safety-Kleen inspects all regulated units for leaks each business day. An inspection checklist (example shown in Figure 11.1-2) is utilized for his purpose. All valves, pumps, and flanges are visually inspected. The inspection items have been properly tagged in accordance with 40 CFR 264.1050(d) and are inventoried on the environmental piping schematic diagrams included in Figure 11.1-1. In the event that a leak is detected, repairs will be implemented in accordance with the applicable provisions of Subpart BB (first attempt at repair within 5 days; repair completed or equipment placed “out of service” within 15 days. For such repairs, a “Leak Detection and Repair Record” will be completed (see Figure 11.1-3 for an example.

Due to the inherent properties of the waste parts washer solvent stored in the tank, the use of a screening device such as a photoionization detector (PID) is impractical. The liquids are heavy and have low vapor pressures, therefore a release would be visible in a liquid phase rather than a vapor. The parts washer solvent has a maximum of 2,000 ppm concentration in the vapor phase.

Alternate Control Devices

No alternate control devices are in use at this facility.

Documentation Of Compliance

Pumps in Light Liquid Service (40 CFR 264.1052)

Safety-Kleen manages parts washer solvent (mineral spirits) that has vapor pressure less than 0.3 kilopascals at 20 degrees C. Therefore pursuant to 40 CFR 264.1030, these materials are classified as heavy liquids.

The existing pumps that manage hazardous wastes at the Tampa facility are identified and listed for use in heavy liquid service. Therefore, the Tampa facility does not have any pumps that are in light liquid service subject to the requirements of 40 CFR 264.1052.

Compressors (40 CFR 264.1053)

The facility does not have any compressors that are in contact with organic chemicals. Therefore, 40 CFR 264.1053 is not applicable.

Pressure Relief in Gas/Vapor Service (40 CFR 264.1054)

The facility does not have any pressure relief subject to the requirements of 40 CFR 264.1054.

Sampling Connecting Systems (40 CFR 264.1055)

The facility does not have any sampling connecting systems or in situ sampling systems.

Open-Ended Valves or Lines (40 CFR 264.1056)

Safety-Kleen has identified the location of each open-ended valve and line and included it in the inspection record. The open-ended valves and lines that are subject to the

requirements of 40 CFR 264.1056 are identified in the facility's environmental piping schematic drawing (Figure 11.1-1). This equipment is either equipped with caps, second valves, or double block and bleed system. A cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves.

Valves in Gas/Vapor Service or in Light Liquid Service (264.1057)

All existing valves that come in contact with hazardous wastes are in heavy liquid service. Therefore, they are not subject to the requirements of 40 CFR 264.1057. If their use is changed to light liquid service, the valves will be monitored for leaks using a portable organic vapor analyzer in accordance with Method 21.

Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors (40 CFR 264.1058)

At the present time, the pumps, valves, flanges, and other connectors at the Tampa facility are used for heavy liquid service. As defined in 40 CFR 264.1031, the mineral spirits solvents managed at the facility are considered to be heavy liquid because the solvents have a vapor pressure less than 0.3 kilopascals at 20° C. Furthermore, no single contaminant is present in the wastes that has vapor pressure greater than 0.3 kilopascals in concentrations in excess of 20% by weight.

In addition, the wastes presently managed in the equipment at the Tampa facility have a maximum of 2,000 ppm concentration in the vapor phase. Therefore, a portable organic vapor analyzer will not detect leaks at 10,000 ppm and a leak will be observed based on a visible liquid leak rather than by a portable organic analyzer.

The first attempt at repair will be made no later than five calendar days after each leak is detected. Pursuant to the requirements of 40 CFR 264.1058, if a visual leak is observed, the affected equipment will be repaired no later than 15 days after it is detected. Whenever a leak is detected as specified in 40 CFR 264.1064 the following will apply:

- A weatherproof and readily visible identification attached to the leaking equipment shall be marked with the following information: equipment identification number, date that evidence of a potential leak was found in accordance with 264.1058(a), and date leak was detected.
- The identification on equipment, except on a valve, may be removed after it has been repaired.
- The identification on a valve may be removed after it has been monitored for two successive months as specified in 264.1057(c) and no leak has been detected during those two months.

Whenever a leak is detected as specified in 40 CFR 264.1058, the following information shall be recorded, as deemed appropriate, in an inspection log and shall be kept as part of the facility operating record:

- The instrument, operator, and equipment ID numbers.
- The date that evidence of a potential leak was found in accordance with 264.1058(a).
- The date the leak was detected and the dates of each attempt to repair the leak.
- Repair methods applied in each attempt to repair the leak.
- “Repair delayed” and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
- Documentation supporting the delay of repair of a valve in compliance with 264.1059(c).
- The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a hazardous waste management unit shutdown.
- The expected date of successful repair of the leak, if the leak is not repaired within 15 calendar days.

- The date of successful repair of the leak.

Recordkeeping Requirements

Pursuant to the requirements of 40 CFR 264,1064, Safety-Kleen has identified all affected equipment by number and location (Equipment Schedule) as shown in Figure 11.1-1.

The following records will be maintained at the Tampa Branch and maintained as part of the facility's operating record.

- Type of equipment; valve, pump, flange, etc.
- Service; light liquid or heavy liquid.
- Percent-by-weight is not necessary for the equipment because the facility manages wastes that are nearly 100% organic by weight.
- Method of compliance; daily inspections.
- ID on the equipment, if they are found leaking, will be implemented.
- Leak monitoring results and any repairs conducted at the facility.

Closed-Vent Systems and Control Devices (40 CFR 264.1060)

Since neither a closed vent system nor a control device is required for, or as part of, the equipment ancillary to the facility's hazardous waste storage tank (equipment subject to Subpart BB), demonstrations of compliance with applicable design, operation and maintenance specifications are not required. The Tampa facility will maintain records as part of the facility's operating record that indicate the name and ID of each equipment (i.e., pumps, valves, flanges, open-ended valves, etc.) at the facility. The record will include the type of chemicals managed in each equipment (i.e., light liquid, heavy liquid, etc.) and the state of the chemicals (i.e., gas, vapor, liquid, etc.) and any leaks detected (i.e., visual, >10,000 ppm, etc.) and the date and type of repair performed to repair the leaking equipment.

Since Safety-Kleen manages organic chemicals that are nearly 100% by weight organic,

Part II P.

- #2. The “other” SWMUs referred to on Part P #1 are those SWMUs listed in Part II Q.
Please refer to Part II Q for a description of those SWMUs.
- #3. No releases have taken place at the facility within the units noted in Part II P #1.