

**Thursby, Kim**

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**From:** Curtis, Jeff [Jeff.Curtis@safety-kleen.com]  
**Sent:** Wednesday, January 04, 2012 1:58 PM  
**To:** Epost HWRS  
**Subject:** RE: Safety-Kleen Systems, Inc.-Tampa; FLD 980 847 271; Revised Part II.P and Q information (Revision 3 dated May 27, 2011) and Confirmatory Sampling Report for SWMU-21 dated December 16, 2011

Received.

Thank you,

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
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**From:** Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]  
**Sent:** Wednesday, January 04, 2012 1:47 PM  
**To:** Curtis, Jeff  
**Cc:** Bahr, Tim; Coates, John; Dregne, James; Honey, Kelly; Knauss, Elizabeth; Schoepke, Robert; [RStebnisky@ectinc.com](mailto:RStebnisky@ectinc.com); Russell, Merlin; Tripp, Anthony  
**Subject:** Safety-Kleen Systems, Inc.-Tampa; FLD 980 847 271; Revised Part II.P and Q information (Revision 3 dated May 27, 2011) and Confirmatory Sampling Report for SWMU-21 dated December 16, 2011

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)

*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](#).*



# 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

January 4, 2012

**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,  
Revised Part II.P and Q information (Revision 3 dated May 27, 2011) and *Confirmatory  
Sampling Report for SWMU-21* dated December 16, 2011

Dear Mr. Curtis:

We have reviewed the Confirmatory Sampling Report and additional information submitted for SWMU-21, the Facility Septic Tank/Drainfield, and provide the following comments.

Your septic tanks should be cleaned out, and the waste should be properly characterized and managed appropriately. Keep the Department informed on these activities (e-mail notifications are acceptable). Continued discharge of industrial waste water to the septic tank would require a Department permit that includes provisions for ground water monitoring. Corrective actions to eliminate the introduction of chemicals regulated by the State of Florida into the septic tank must be implemented. These corrective actions begin with the identification of practices that may have introduced chemicals into the septic tank (include this information with background information in your plan discussed below). Within 30 days of receipt of this letter, submit a plan to eliminate chemical discharges to the septic tank. This plan must also include a short-term plan to prevent discharges to sinks and drains currently leading to the septic tank and a long-term solution to eliminate discharge, such as hookup to the local sewer line. The District office has provided you with contact information to initiate discussions for connecting to the local sewer line.

You shall proceed with cleanout of the septic tank. Submit a letter report documenting the cleanout within 30 days of receipt of this letter. The report must, at a minimum, include the analytical data used for determining proper management of the material removed from the septic tank.

Because assessment of the septic tank/drainfield area is required, SWMU-21 will be moved from Appendix A.1 to Appendix A.2 "List of SWMUs/ AOCs requiring Site Assessment (a/k/a RCRA Facility Investigation [RFI]) or a Risk Assessment" in your permit, once issued. Although the permit is not yet renewed (re-issued), the Department is notifying you in writing that further investigation of this site is required pursuant to Specific Condition Part V.3 of your (draft) permit. In accordance with Specific Condition Part V.5, you are required to commence

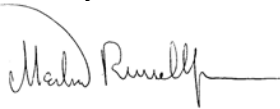
Mr. Jeff Curtis  
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January 4, 2012

site rehabilitation in accordance with Rule 62-730.225 and Chapter 62-780, Florida Administrative Code (F.A.C.). You shall commence and complete site assessment in the manner and within the time limits set forth in Rule 62-780.600, F.A.C. Specifically, you are required to commence site assessment in accordance with Rule 62-780.600, F.A.C, and you must submit a Site Assessment Report (SAR) within 270 days of discovery. The laboratory's final report is dated December 5, 2011 and can be used as the date of discovery. The SAR is therefore due no later than September 3, 2012 (September 1 falls on a Saturday). The 270-day requirement should be more than enough time to provide the Department with a *complete* SAR.

Because Chapter 62-780 does not require the submittal of a Contamination Assessment Plan, the Department is more than willing to discuss the exclusion of certain SAR requirements that may not be applicable or appropriate for this site. In short, the proposed wells and locations are acceptable as a first step but additional wells may be needed to complete the SAR (e.g., there may be mounding at and around the septic tank and drainfield, a background well may be needed, some of the wells may not be downgradient, vertical assessment may be required, etc.). It is also suggested that the initial four new wells be sampled for the complete list of contaminants approved in the Confirmatory Sampling Workplan before contaminants are excluded from further sampling.

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)  
Kelly Honey, FDEP Tampa, [Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)  
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