

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Monday, July 09, 2012 10:52 AM
To: Russell, Merlin
Cc: Thursby, Kim
Subject: RE: FLD984167791; Safety-Kleen Boynton Beach Request for Additional Information

Received. Sorry, and thank you.

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
www.safety-kleen.com

From: Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]
Sent: Monday, July 09, 2012 10:45 AM
To: Curtis, Jeff
Cc: Thursby, Kim
Subject: FW: FLD984167791; Safety-Kleen Boynton Beach Request for Additional Information

Jeff,

Would you please let Kim know you received this RAI? Thank you.

merlin

From: Epost HWRS
Sent: Wednesday, June 20, 2012 4:35 PM
To: Jeff.Curtis@safety-kleen.com
Cc: Bahr, Tim; Coates, John; Russell, Merlin; Winston, Kathy; Kantor, Karen E.; Tripp, Anthony; Kothur, Bheem
Subject: FLD984167791; Safety-Kleen Boynton Beach Request for Additional Information

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. (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.

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

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

June 20, 2012

Sent Via E-mail

Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, Florida 33426

**Subject: Safety-Kleen Systems, Inc. FLD 984 167 791, Operating Permit No.
49625/HO/007
Palm Beach County
First Notice of Deficiencies**

Dear Mr. Curtis:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-730.220 and Chapter 403.722, Florida Statutes (F.S.).

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be schedule as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

An official response to these comments is due within thirty (30) days of receipt of this document. Additional time can be granted if it becomes apparent during the response process that more time is needed.

Mr. Jeff Curtis

June 20, 2012

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If you would like to arrange a meeting or have any questions, please call me at 850-245-8796 or merlin.russell@dep.state.fl.us

Sincerely,

A handwritten signature in black ink, appearing to read "Merlin Russell", followed by a horizontal line.

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

MR/mdr

Enclosures

cc via e-mail w/enclosures:

Karen Kantor, DEP Karen.E.Kantor@dep.state.fl.us

Kathy Winston, DEP Kathy.Winston@dep.state.fl.us

ENCLOSURE

SK Boynton Beach FLD984167791
Operating Permit No. 49625/HO/007
Palm Beach County

1. Part I.D.3: A Process Design Capacity column with units of measure is required (include as you did with your SK Tampa Part B).
2. Part I, D. Operating Information, Page 3: Additional information needs to be included for the 10-day hazardous waste transfer area. The Part B must include the operation of this facility in the application. The Part B must describe how the 10-day wastes are kept separate from other material being stored at the facility. It must also make clear that no 10-day wastes are being manifested to the Boynton Beach facility and are only in transit to other TSD facilities.
3. Part I, D. Operating Information, Page 4, first paragraph: The FDEP used antifreeze document has been recently updated (May, 2012, http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/Antifreeze-Guidance_2012.pdf). You should update your Part B using this edition throughout the application.
4. (Page 9, last paragraph) There is a discussion of management of mercury lamps and devices. Somewhere here there should probably be a reference to the training requirements of Rule 62-737.400, F.A.C.

Cost Estimates

5. Part II, A. General, 2. Financial Assurance for Closure: The facility has capacity for 35,000 gallons of used oil, at least 5,000+ gallons of oily wastewater, and used oil filters. By definition (62-710.201(3), F.A.C.), you are a used oil processor. A used oil processor requires a used oil permit which is combined with your hazardous waste permit. Subsection 62-710.800(6), F.A.C., requires you to provide financial assurance for closure costs associated with used oil processing activities. While your current closure costs for hazardous waste include the decontamination of the tanks and testing for environmental contamination, they do not include costs for the disposal of the used oil, oily wastewater, and oil filters. The disposal costs for these items needs to be accounted for in your closure cost estimates.

6. Contingency Plan

1. In accordance with 40 CFR 270.32(b)(2), we request that the page containing Safety-Kleen emergency coordinators be provided to the adjacent school and the school board in the event that either entity feels the need to contact Safety-Kleen for health and safety issues. We also request that Safety-Kleen enter into an agreement with the school and school board concerning a notification process in

the event that the Safety-Kleen facility requires evacuation. Safety-Kleen should retain documentation in the operating record that the information was provided to both entities.

2. Page 25, in the "Equipment" paragraph, the Department suggests language to the effect that emergency equipment that is cleaned should be deemed fit for use after a response (264.56(h)(2)).
3. Page 27 indicates more than a 20' distance for the tank farm from the property line but that the flammable storage area is 50' or more from the property line. Page 69, first paragraph also states that there is 50 ft setback from property line for storage of ignitable waste. It is unclear why the "...more than 20' from the property line." is mentioned here.
4. The Department recommends that a copy of the CP be maintained at a nearby but offsite location in the event that onsite access to the CP is not possible.
5. The Department recommends the option of electronic copies, instead of or in addition to hard copies, be made available for local authorities/first responders.
6. The mercury cleanup kits mentioned in the list of emergency equipment at the facility should also be located on board your trucks. If so, your Part B should say so.

7. Waste Analysis Plan (WAP)

1. On page 64, we suggesting adding the following to the information maintained as part of the operation record:
 - a. Training records
 - b. Inspection reports
 - c. Waste minimization certifications
 - d. Closure plan
 - e. Corrective Action documents
2. Table 7.1-1: The Notes at the bottom should identify the double and triple asterisks ("**" and "***) found in the table.
3. Table 7.1-2: The superscript "a" next to "Parameter" in the second column should be identified. Also, MIBK should be included for a parameter of the paint waste (for consistency with page 51).
4. The WAP should describe the process by which Safety Kleen determines a representative sample for its annual characterization process.

Container Management

8. Part II, page 69 states that the solvents are typically compatible and suited for bulking but in some isolated instances, waste segregation may be needed. Describe the segregation procedures and management of these wastes under these circumstances.

Tanks

9. In the May 21, 2012 written assessment of the tank system's structural integrity and suitability for handling hazardous waste, as required under 40 CFR Parts 264.191 and

264.192, there is comment that the top manway flange is bent and damaged, resulting in a gap between the flange and the cover. Please describe the efforts taken to remedy this condition.

10. The Part B is unclear about secondary containment for ancillary equipment. Although the application asserts compliance with 40 CFR Part 264.193 requirements, it is unclear whether the ancillary equipment contains secondary containment or if the ancillary equipment is above ground and visually inspected on a daily basis. Ancillary equipment must be provided with secondary containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (b) and (c) of this section except for (264.193(f)):
1. Aboveground piping (exclusive of flanges, joints, valves, and other connections) that are visually inspected for leaks on a daily basis (264.193(f)(1));
 2. Welded flanges, welded joints, and welded connections, that are visually inspected for leaks on a daily basis (264.193(f)(2));
 3. Sealless or magnetic coupling pumps and sealless valves, that are visually inspected for leaks on a daily basis (264.193(f)(3)); and
 4. Pressurized aboveground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices) that are visually inspected for leaks on a daily basis (264.193(f)(4)).

There are no figures or text illustrating or discussing the layout of the ancillary equipment for the tank system. Information should be submitted that illustrates the layout of the piping system between the fill/return stations and the hazardous waste tank. Construction material and size of the pipes should be provided. Locations of pumps should be provided. In part, the details of the ancillary equipment are needed in order to estimate costs for flushing and removing the pipelines at closure.

11. Page 77, Return/Fill Containment: The area of the grating is given as 54' x 78' as shown in Figure 9.3-1, but the grated area appears to be much smaller in dimension according to the scale of the figure. Please clarify.
12. Page 80, last paragraph should read ...within "15" days for subsequent reporting per 40 CFR Part 264.56(h)(2)(i), F.A.C.

Closure Plan

13. In general, this closure plan (CP) lacks some details normally included in a closure plan, primarily because closure is not anticipated for some time and therefore details are unknown. However, page 89 does reference a "formal closure plan." In discussions with you (Jeff Curtis) on May 30, 2012, we agreed that when Safety-Kleen decides to formally close, you would notify the Department and at that time, work with DEP to update the closure plan using the current requirements and FDEP

guidance documents. The contents of this paragraph should be included within your closure plan.

14. Throughout the CP, decontamination waters are proposed to be compared to GCTLs. Although acceptable, comparison to GCTLs is not their intended application. The CP can be changed to indicate that decontamination will be done to meet FDEP's guidance at the time of closure. This is a detail that can be worked out later.
15. The maximum inventory is not identified in the CP although it is 15,000 gal for the tank and 6,912 gallons for containers according to other parts of the application (e.g., Table 7.1-1 and page 82).
16. This Closure Plan should state that sampling and analyses will be done in accordance with FDEP Standard Operating Procedures (SOPs) located at <http://www.dep.state.fl.us/water/sas/sop/index.htm> and the requirements of a Sampling and Analysis Plan (SAP) per subsection 62-730.225(3), F.A.C.
17. (92/bullet 2): Soil sample concentrations must be compared to Soil Cleanup Target Levels (SCTLs) in Chapter 62-777, F.A.C. Concentrations should be compared to both the residential and industrial/commercial SCTLs while evaluating closure and/or postclosure options.
18. (93/bullet 1): If the debris passes TCLP, there may be other options for re-use or disposal. The concrete may qualify as clean debris (Subsection 62-701.200(15), F.A.C.). If not, management options will be available in accordance with solid waste rules and/or guidance.
19. (93/bullet 3): Some commercial sources of backfill provide analytical data that may be used in lieu of (presumably) your own sampling and analysis (although the CP does not specify that SK will do the sampling).

Information Regarding Potential Releases from SWMUs

20. Some of the SWMU identification/nomenclature is inconsistent. It is important to use consistent nomenclature with the assigned SWMU number. We are working with you to draft an RFA Addendum. This document, once finalized, can be referenced or included in the application to meet the permit application requirements.
21. Figure Part II-Q: Typo of SWMU 13: Should probably be "Cont. Loading Dock". Also, the figure will need to be updated to be consistent with the RFA Addendum currently being drafted.

Mr. Jeff Curtis

June 20, 2012

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Air Emission Standards

22. Tables 11.2-1 and 11.2-2: Both of these tables reference Table 11.2-3, but there is not a Table 11.2-3 in the application. Also, Table 11.2-2 references Control Option !! What is this control option?
23. **Appendix F** is entitled EPA Region 4 RFA but it contains Safety-Kleen's HSWA permit renewal letter dated June 11, 2001. The Department suggests keeping this letter and including the August 1991 RFA (it is short) in this attachment.