From: Curtis, Jeff
To: Tripp, Anthony;
cc: Russell, Merlin;
Subject: (Archived w/ Attachments) RE: Safety Kleen Boynton Beach registration
Date: Monday, August 06, 2012 2:43:00 PM
Attachments: image001.png

Tony,

Sorry for the delayed response, but I was off on Friday. I have reviewed the registration document that you attached. This document was completed by a 3rd party company that handles our transportation registrations and they must have checked the used oil fuel marketer in error. The Boynton Beach facility has never been a used oil fuel marketer so I apologize for the error. The only Safety-Kleen facility in Florida that meets the definition as a used oil fuel marketer is our Ocala facility. Our other Florida facilities only collect oil and transfer the material to another SK facility that has the capability to process or re-refine the oil. I am in the process of completing new updated 8700-12FL forms for all Safety-Kleen facilities in Florida due to the corporate address change and will be correcting the used oil fuel marketer issue. I have also contacted JJ Keller and informed them that they were completing the forms incorrectly and advised them of the same.

Regarding the PCH question no the facility is not a handler and the oily water tank does not qualify as petroleum contact water as defined in 62-740, FAC.

Thanks,

Jeff Curtis EHS Manager | Safety-Kleen | Boynton Beach, FL | jeff.curtis@safety-kleen.com

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Description: Description: Description: Description: Description: Description: Description: cid:44AA1B4A-6723-4185-8E8F-99574359490E

From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Friday, August 03, 2012 10:57 AM
To: Curtis, Jeff

Cc: Russell, Merlin
Subject: Safety Kleen Boynton Beach registration

Jeff,

In the attached registration document, the Safety-Kleen location in Boynton Beach has checked that they are a used oil fuel marketer. Since that location is registered as a fuel marketer and the capacity at that location is greater than 25,000 gallons, that location meets the definition of a used oil processor. As such, the Department is not requiring you to obtain a used oil processing permit. Our preference would be to incorporate any additional used oil processing conditions into the renewal of your hazardous waste permit. But we would require financial assurance for the used oil capacity which could be included as closure costs associated with the hazardous waste storage tank in the same area. Give me call if you would like to discuss the options I have mentioned here.

Also, on the same form you do not indicate that this location is a petroleum contact handler. Does the 5,000 gallon tank listed as containing "oily water" qualify as petroleum contact water as defined in 62-740, Florida Administrative Code?

Thanks.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

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