

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Wednesday, November 14, 2012 9:03 AM
To: Epost HWRS
Subject: RE: Safety-Kleen Systems, Inc. FLD 984 171 694, First Notice of Deficiencies

Received.

Thank you,

Jeff Curtis EHS Manager | Safety-Kleen | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.600.3076 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Wednesday, November 14, 2012 8:49 AM
To: Curtis, Jeff
Cc: Bahr, Tim; Goddard, Charles; Kantor, Karen E.; Winston, Kathy; Tripp, Anthony; Russell, Merlin
Subject: Safety-Kleen Systems, Inc. FLD 984 171 694, First Notice of Deficiencies

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.

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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**

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TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 14, 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 984 171 694, Operating Permit No. 56019-
HO-007
Miami-Dade 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
November 14, 2012
Page 2 of 6

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", with a horizontal line extending to the right.

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 Medley 984171694
Operating Permit No. 49625-HO-005
Miami-Dade County

1. Part I, General, page 6, item B.1: The latitude is listed as 25° 51' 90". The seconds component of this item cannot be greater than 59". Please revise with the appropriate coordinates.
2. Figure 2.2.1: It is nearly impossible to identify with certainty, the surface water bodies.
3. Figure 2.2-2: It is not possible from the figure to determine which flood zone was determined for the property. At a minimum, the Zone the property lies within and its boundaries must be identified. Also, ensure that the legend identifies the Zones.
4. Figure 2.2-3 is not a Surrounding Land Use Map; rather, it identifies the property owners. The figure should be updated to indicate land use. There also appears to be an unidentified piece of property adjacent to the southeast corner of the Safety-Kleen property (appears to be a right of way). Its land use must be identified. Also, check to see if properties 4 & 5 should be U.S. Holdings, Inc. rather than U.S. Assets, Inc., and d.b.a. U.S., rather than UN Foundry.

Contingency Plan

5. It appears that some pages were omitted from the beginning of the CP. On page 9 (and elsewhere in the CP), under "Emergency Coordinator" and later under "Emergency Response Agencies and Team Members" there is a reference to "Page iii at the beginning of Section 5..." There is no page iii (and presumably pages i and ii) or "Section 5". Apparently these pages include the emergency contacts and contact information.
6. Page 14: At the very top, include "Ste 200" after 400 N. Congress Ave. for the district mailing address.
7. Page 25, item 2, note: Typo or printer error-should be "...1,200°F).".
8. Un-numbered page 30, *Arrangements with Local Authorities*, should be numbered.
9. There appears to be no reference to testing and maintenance of communications, alarms, spill control equipment, sprinkler systems, fire extinguishers, automatic high level alarms, etc. (40 CFR Part 264.33)
10. 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.
11. The Department recommends the option of electronic copies, instead of or in addition to hard copies, be made available for local authorities/first responders.

Training

12. Table 6.1-10 Job Description for OIL/VAC Sales and Service Rep.: Something is missing from the first line, "...to remove waste fluid our customers (VSSR Route)." Also, the abbreviation VSSR should be identified.

Waste Analysis Plan (WAP)

13. Page 6 under Aqueous Parts Washer Solvent, second line, the word “to” is missing between “transported” and “customer”.

Tanks

14. Page 3: Containment is misspelled in “Tank System Secondary Containment”.

15. Page 5 notes that daily inspections occur; however, the daily inspection log specifies that daily tank inspections are only Monday through Friday. Inspections are required each operating day per 40 CFR Part 264.195. EPA has clarified that each operating day has been defined as “...every day the tank is in operation (i.e., storing or treating hazardous waste) and not necessarily just on days the facility is open for business.” [Source: *Introduction to Tanks*, EPA/530/K-05/018, September 2005, <http://www.epa.gov/osw/inforesources/pubs/hotline/training/tanks05.pdf>] Where daily visual inspections are being used as a means of leak detection, the inspections must occur every day that the tank is in operation.

16. The piping is inspected daily, suggesting that the piping does not contain secondary containment. If the piping is all above ground, the Part B should reflect such.

17. The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's “Flammable and Combustible Liquids Code,” (1977 or 1981), (incorporated by reference, see Sec. 260.11) (264.198(b)). This requirement must be added to the tank section.

Part II J

18. Table 5.2-1, page 1 of 2: There is a typo in the last row, last column-“Leaks” should be “Daily”

19. Figure 8.1-1: The legend contains “Area Used for Waste Transfer”, and there is a “Waste Transfer Area” designated in the warehouse. We suggest that the legend be changed to “Permitted Container storage” to avoid confusion and be consistent with the actual wording used on the hatched area within the warehouse.

20. On page 2, 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.

21. Page 3, first bullet: “organics” is misspelled.

Closure Plan

22. 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, we agree as noted in this CP 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.

23. Page 2, Container Storage Areas, first bullet: "TSDG" should be "TSDF".

24. Page 4, second bullet and page 5, third bullet: "GWTLs" should be "GCTLs".

Part II.P Information Regarding Potential Releases from SWMUs

25. The application instructions should be re-written to clarify that hazardous waste units that are permitted or are seeking a permit such as the tanks and containers should be excluded from the checklist. You do have, for example, waste recycling units, a non-permitted container storage area (satellite accumulation areas), a transfer station and checking the "other" box is appropriate. Please update this section.

26. The SWMUs listed on pages 1 and 2 should include their formal names. The first six are included in your existing permit. SWMUs 7-10 were added as was done at Boynton Beach. Although not required, we suggest the same nomenclature be used. SWMU-11 should be the stormwater discharge area that is part of your IW permit with DERM. As you may recall, on May 23, 2012, we discussed your IW permit that allows sheen-less stormwater from secondary containment to be discharged somewhere on site. The area is required to be monitored twice a year by DERM's permit. As previously discussed, this area should be identified as a SWMU. This area must be also be identified in the map that identifies each SWMU location.

27. Also, in Part II A. General-Run off Control System, there is no oil/water separator before stormwater goes to French drain. This French Drain functional acts as a stormwater pond in that both collect stormwater, and this French Drain should be identified as a SWMU. Parts P & Q require information for this SWMU.

Part II.Q Information Requirements for Solid Waste Management Units

28. It would be appropriate to include the Department's September 24, 2012 acceptance letter for the July 31, 2012 Site Rehabilitation Report

Part II S Air Emission Standards

29. Figure 11.1-1 (figure number and information on the figure are barely legible) from 1992, does this figure accurately reflect what is present at the site today?

30. Figure 11.1-1 and corresponding Figure 11.1-2: Item #39 on Figure 11.1-1 is not on the list in Figure 11.1-2. Items #31 & 32 (3" Tank Flange) are located next to each other on the same pipe coming from the ethylene glycol tank. Items #33 & 34 (3" Blind Tank Flange) are located next to each other on the same pipe coming from the ethylene glycol tank. Items #37 & 38 (1" Ball Valve) are located next to each other on the same pipe coming from the ethylene glycol tank. Are these items (#31, 32, 33, 34, 37, and 38) supposed to be located as indicated?

31. Table 11.2-3, Subpart CC Control Options: What is the purpose of Table 11.2-3? All references to 40 CFR 284 need to be changed to 40 CFR 264.

32. Page 6: Under Subpart CC Tank Standards (40 CFR 265.1084), the first line has a Boynton Beach reference instead of Medley.

Containment

33. The engineers report lists secondary containment area for the tanks as 58 ft by 40 ft. The figures throughout the application list the containment area as 58 ft by 56 ft. Using the scale on these same figures the width was calculated as 40 ft. Please revise the figures to reflect this actual width.

34. Page 21 of the Preparedness, Prevention, Contingency Plan, and Emergency Procedures for Daily Business Operations section: The text mentions that the tank area has more than 20,000 gallons of secondary containment but there are no calculations to support this claim. In Appendix C, the engineering calculations (from 1992) are not provided for the secondary containment for the tank farm. Where are the calculations (certified by a PE) related to the volume of containment for the tank farm?

Appendix E Tank Assessments

35. How does Safety-Kleen intend to address the following items mentioned in the report:

1. Minor spalling and cracking in the containment concrete.
2. Coating failure of the steel skirt.
3. Deterioration of the shell coating.
4. Standing water on the roof of the tank. What is the source of the standing water?

Also, the picture of the Floor Interior of the tank (page 13 of 14) shows many gallons of a brown colored liquid. Is this liquid hazardous waste that was not removed prior to the inspection? If so, how was the inspection of the tank floor conducted without exposing the inspector to hazardous waste?