



December 13, 2012

Mr. Merlin Russell Jr.
Professional Geologist II
Hazardous Waste Regulation
Florida Department of Environmental Protection
2600 Blair Stone Rd., M.S. #4560
Tallahassee, FL 32399-2400

**RE: Safety-Kleen Systems, Inc. Medley; FLD 984 171 694, Operating Permit No. 56019-
HO-007, Miami-Dade County
First Notice of Deficiencies Dated November 14, 2012**

Dear Mr. Russell:

Safety-Kleen (SK) has prepared this letter in response to the above referenced letter from the Department dated November 14, 2012. We have identified each of the Departments comments in bold, followed by our response. Revised pages of the application are enclosed with this submittal.

FDEP Comments #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.

SK Response: Item B.1 has been revised appropriately.

FDEP Comments #2: Figure 2.2-1: It is nearly impossible to identify with certainty, the surface water bodies.

SK Response: Figure 2.2-1 has been revised.

FDEP Comments #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 legal identifies the Zones.

SK Response: Figure 2.2-2 has been revised.

FDEP Comments #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.

SK Response: Figure 2.2-3 has been revised.

FDEP Comments #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.

SK Response: Page iii was not submitted with the original application. It is included in this submittal. There are no pages i or ii.

FDEP Comments #6: Page 14: At the very top, include "Ste 200" after 400 N. Congress Ave. for the district mailing address.

SK Response: Page 14 has been revised accordingly.

FDEP Comments #7: Page 25, item 2, note: Typo or printer error-should be "...1,200°F)."

SK Response: Page 25 has been revised accordingly.

FDEP Comments #8: Un-numbered page 30, *Arrangements with Local Authorities*, should be numbered.

SK Response: Page 30 has been revised accordingly.

FDEP Comments #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)

SK Response: The above language has been added on page 23 of the CP.

FDEP Comments #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.

SK Response: SK keeps an electronic copy of the CP on a shared drive that is accessible by computer at all times. In addition, all emergency response agencies are provided a copy of the plan.

FDEP Comments #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.

SK Response: SK will provide electronic copies of the CP if, after consulting with local authorities, it is deemed practical to those agencies.

FDEP Comments #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.

SK Response: Table 6.1-10 has been revised accordingly.

FDEP Comments #13: Page 6 under Aqueous Parts Washer Solvent, second line, the word "to" is missing between "transported" and "customer".

SK Response: Page 6 has been revised accordingly.

FDEP Comments #14: Page 3: Containment is misspelled in "Tank System Secondary Containment".

SK Response: Page 3 has been revised accordingly.

FDEP Comments #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.

SK Response: SK is currently in discussions with the Department with regards to acceptable means of completing these daily inspections.

FDEP Comments #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.

SK Response: Page 5 has been revised to indicate the piping is all above ground.

FDEP Comments #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.

SK Response: Page 3 has been revised to include the above requirement.

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

SK Response: Table 5.2-1 has been revised accordingly.

FDEP Comments #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.

SK Response: Figure 8.1-1 has been revised accordingly.

FDEP Comments #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.

SK Response: Page 2 has been revised to indicate that decontamination will be done to meet FDEP's guidance at the time of closure.

FDEP Comments #21: Page 3, first bullet: "organics" is misspelled.

SK Response: Page 3 has been revised accordingly.

FDEP Comments #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.

SK Response: SK is in agreement with the Department.

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

SK Response: Page 2 has been revised accordingly.

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

SK Response: Pages 4 and 5 have been revised accordingly.

FDEP Comments #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.

SK Response: This section has been updated accordingly.

FDEP Comments #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 also be identified in the map that identifies each SWMU location.

SK Response: The above information has been revised accordingly. Please note that the current DERM IW permit requires SK to monitor once a year. Previously it required monitoring twice a year.

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

SK Response: Parts P & Q have been revised accordingly.

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

SK Response: The above revision has been completed.

FDEP Comments #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?

SK Response: The previous figure 11.1-1 submitted to the Department was not accurate. It was an old figure that was created at the time the facility opened. The figure has been revised and is included with this submission.

FDEP Comments #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 (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?

SK Response: Figure 11.1-1 and 11.1-2 have been revised accordingly.

FDEP Comments #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.

SK Response: Table 11.2-3 has been revised accordingly.

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

SK Response: Page 6 has been revised accordingly.

FDEP Comments #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.

SK Response: The figures have been revised to 40 ft. width.

FDEP Comments #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?

SK Response: The calculations for the secondary containment of the tank farm were mistakenly missing from the original permit application submission. The calculations are included within this submittal.

FDEP Comments #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?

SK Response: Safety-Kleen's engineering department contacted the tank inspector with regards to the items mentioned in his report at our Medley facility. As stated in the report, he confirmed that the tank is in overall satisfactory condition for continued use. With respect to your questions Safety-Kleen offers the following response:

1. The inspector confirmed the minor spalling and cracking were minor hairline cracks on the outside of the containment wall. His opinion is the cracks are not a concern to the integrity of the containment wall, but they should be monitored going forward. Safety-Kleen will closely monitor these issues as part of its daily tank inspections and make repairs as necessary.
2. The coating failure of the steel skirt was identified by Safety-Kleen before the tank inspection. We recently had the tanks pressure washed to remove dirt build up and this removed the coating on the skirt revealing the rust build-up. Safety-Kleen has budgeted for the rust removal and re-painting of the skirts at the beginning of 2013.
3. The deterioration of the shell coating was mentioned because of minor cracking in the paint on the tank. This item will also be monitored as part of the facility inspection plan.
4. It was the opinion of the inspector, as well as ours, the standing water on top of the tank was either condensation or leftover water from the recent pressure washing of the tank.

The brown colored liquid on the tank floor interior is wash water from the tank clean out. The tank clean out took place immediately before the inspection was performed. This was wash water that migrated down the sides of the tank afterwards. The inspector confirmed the amount was minimal (a few gallons at most), and did not interfere with the inspection. He was able to achieve thickness readings, and fully protected with proper Personal Protective Equipment (PPE) at all times during the inspection.

Mr. Merlin D. Russell Jr.

December 13, 2012

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Thank you for the Departments time in this matter. If you have any question or require additional information, please do not hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read "Jeff Curtis", with a long horizontal line extending to the right.

Jeff Curtis

EHS Manager, Florida

Safety-Kleen Systems, Inc.

Enclosure(s): Permit application revisions

cc: Kathy Winston, FDEP Southeast District

Revision Number	0
Date	09/20/12
Page	3 of 4

16. Site ownership status

- ☒ Owned ☐ To be purchased ☐ To be leased _____ years
☐ Presently leased; the expiration date of the lease is ____/____/____.

If leased, indicate land owner's name _____

Address _____
Street or P.O. Box city state zip

17. Name of engineer Robert W. Fox Registration No. 40980

Address 5909 Hampton Oaks Pkwy. Suite D Tampa FL 33610
Street or P.O. Box city state zip

Associated with Environmental Resources Management

18. Is the facility located on Indian land? ☐ Yes ☒ No

19. Existing or pending environmental permits (attach a separate sheet if necessary)

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
HW Permit	FDEP	56019/HO/006	07/01/08	03/19/13
Industrial Waste	DERM	IW-000333	6/1/12	5/31/13
LW Transporter	DERM	LW-000046	4/1/12	3/31/13
Air Emmissions	DERM	AP-001521	7/1/12	6/30/13

B. Site Information

1. The facility is located in Miami-Dade County.

The nearest community to the facility is Medley

Latitude 25 51' 36.62" Longitude 80 20' 25.25"

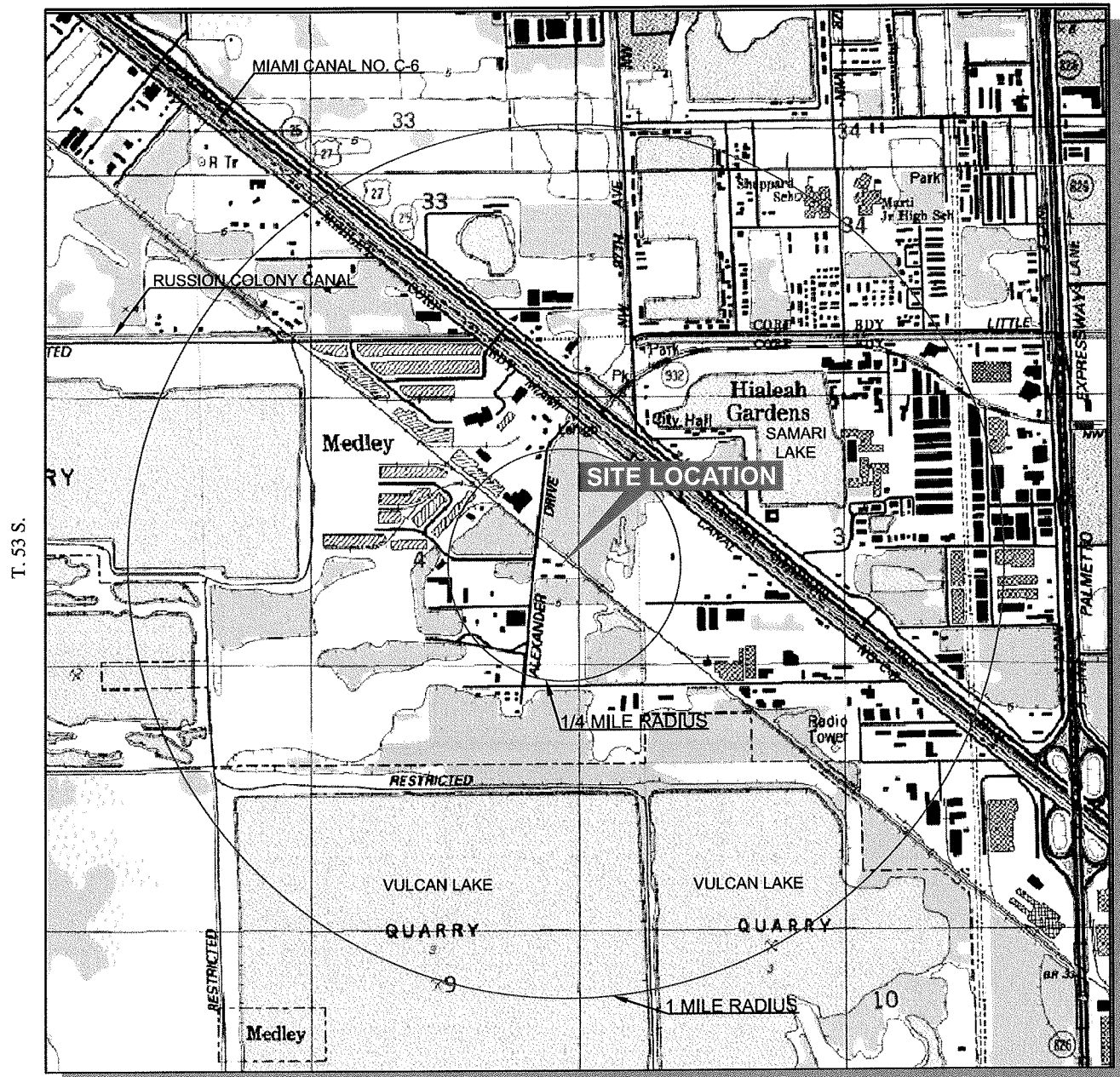
Method and datum GPS UTM 17/604610/22116660

2. The area of the facility site is 4.5 acres.

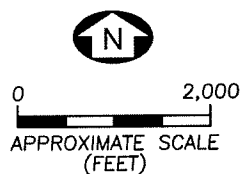
3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Also show the hazardous wastes traffic pattern including estimated volume and control.

FIGURE 2.2-1 Topographic Map Safety-Kleen Systems, Inc. Facility Medley, Florida

HIALEAH QUADRANGLE
FLORIDA-DADE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
PHOTOREVISED 1988

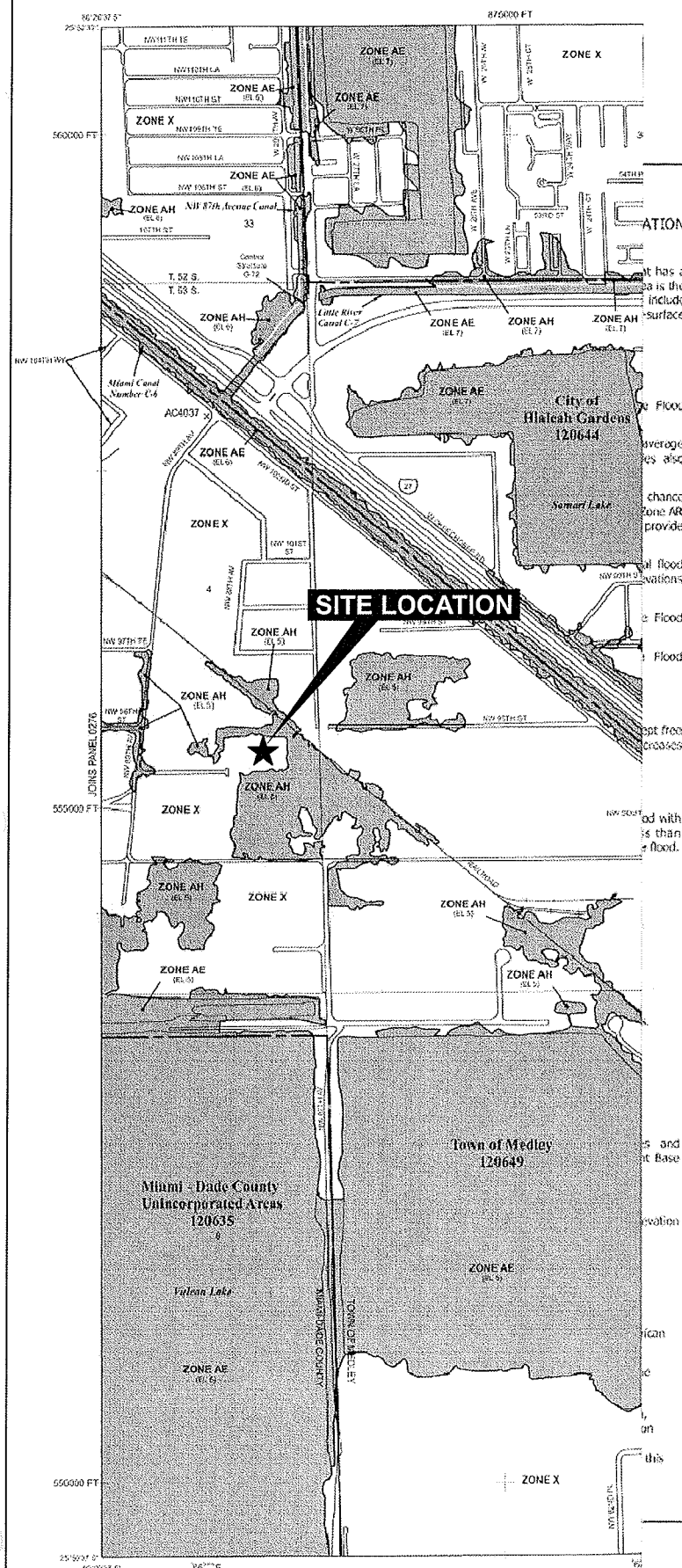


R. 40 E.



ERM.

FIGURE 2.2-2 SITE LOCATION MAP SAFETY-KLEEN FACILITY MEDLEY, FLORIDA



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0277L

FIRM

FLOOD INSURANCE RATE MAP

MIAMI-DADE COUNTY, FLORIDA AND INCORPORATED AREAS

PANEL 277 OF 1031

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS

COMMUNITY	NUMBER	PANEL	SUFFIX
HIALEAH GARDENS, CITY OF	120644	0277	L
HIALEAH, CITY OF	120643	0277	L
MEDLEY, TOWN OF	120649	0277	L
MIAMI-DADE COUNTY	120635	0277	L

Notes to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
12086C0277L

MAP REVISED
SEPTEMBER 11, 2009

Federal Emergency Management Agency

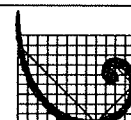
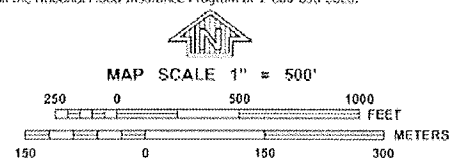
MAP REPOSITORY
Refer to listing of Map Repositories on Map Index

EFFECTIVE DATE OF COUNTYWIDE
FLOOD INSURANCE RATE MAP
January 28, 1993

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL
March 2, 1994 - May 16, 1994 - July 17, 1995 - for description of revision, see Notice to Users page in the Flood Insurance Study report
September 11, 2009 - to reflect revised shoreline, to incorporate previously issued Letters of Map Revision, to reflect updated topographic information, to update corporate limits, to add and change Base Flood Elevations, to change zone designations, to add roads and road names, and to add and change Special Flood Hazard Areas

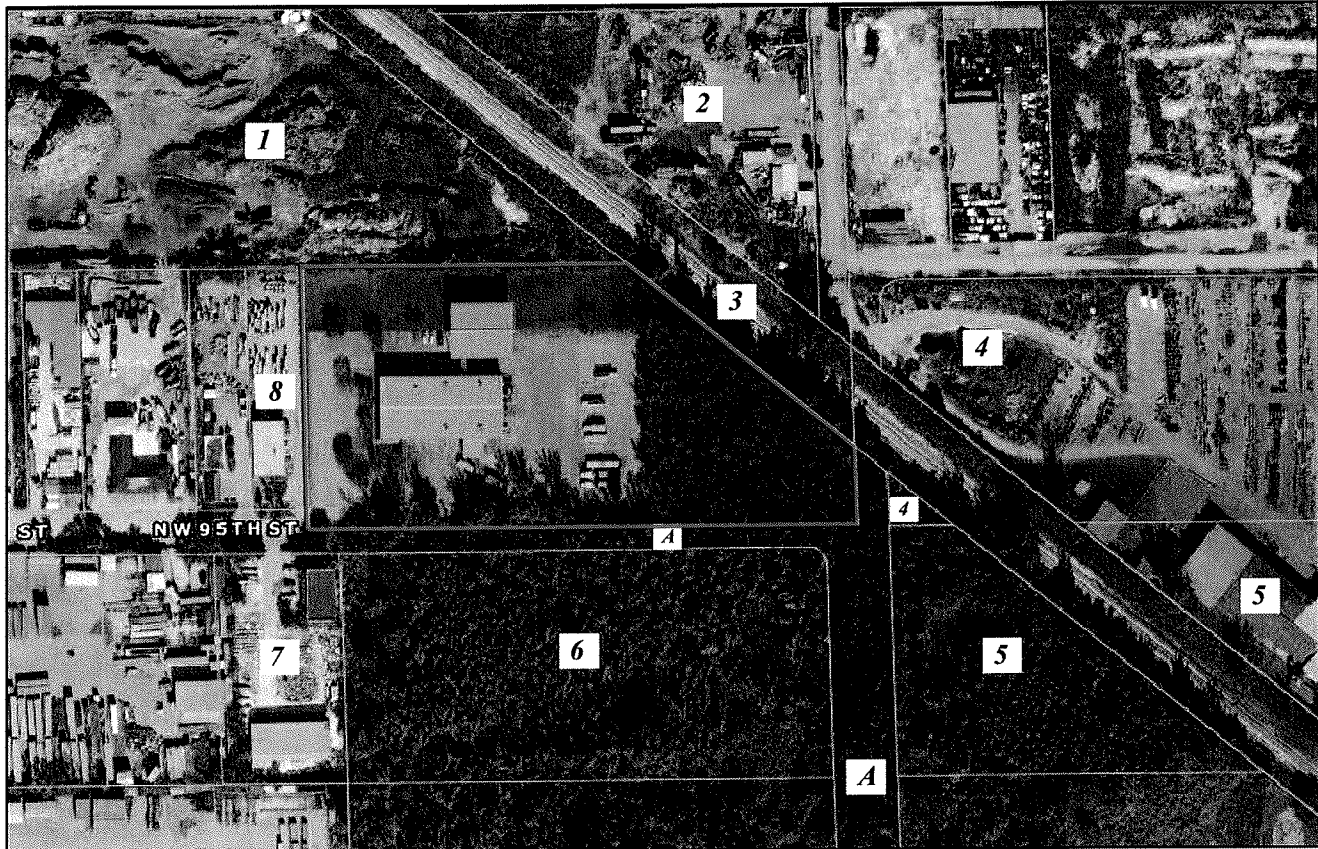
For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.



ERM.

Figure 2.2-3
Surrounding Land Use Map
Safety-Kleen Systems, Inc. Facility
Medley, Florida



0 250
APPROXIMATE SCALE
(FEET)

Adjacent Property Owners

1. Florida Wood Recycling
2. John P. Debogory & John Thorsen
3. Florida East Coast RR Company
4. US Holdings, Inc.
5. US Holdings, Inc.
6. Broness Investments NV % R V Martin
7. Adalberto Hernandez
8. Orlando Otero

Land Use

- Warehouse or Storage
Warehouse or Storage
Railroad Assessment
Vacant Land
Heavy Industrial or Lumber Yard
Vacant Land
Light Manufacturing & Food Processing
Warehouse or Storage
- A. No ownership information available Visually appears to be undeveloped and vacant

Source: Miami-Dade County Office of the Property Appraiser



Revision Date: 03/03/2010

**Safety-Kleen 309702
Medley Branch
Emergency Phone Numbers**

Primary:	Larry Rodriguez 18201 NW 86 Ave. Hialeah, FL 33014 Office (305) 884-0123 Cell (786) 472-0091	Alternate:	Jorge Rigo 6541 SW 10 St. Pembroke Pines, FL 33023 Office (305) 884-0123 Cell (786) 299-6375
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Emergency Notification Numbers

Infotrac (Safety-Kleen's 24 Hour Emergency Response Reporting System)
1-800-468-1760

Florida DEP- Southeast District

(561) 681-6600 (Monday – Friday, 8:00 a.m. to 5:00 p.m. except Holidays)
After Hours, please call (850) 413-9911 or 1-800-320-0519

If you are unable to contact the DEP at the above, please call:
National Response Center 1-800-424-8802

Emergency Teams to be Notified:

Metro Dade Fire Rescue
9300 NW 41st Street
Miami, FL 33178
(786) 331-4256 or 911

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
(305) 883-2044 or 911

Palmetto General Hospital
2001 West 68th Street
Hialeah, FL 33016
(305) 823-5000

Primary Contact
SWS
3133 NW 25th Ave
Pompano Beach, FL 33069
(800) 282-4584

Secondary
ACT Inc.
1875 W. Main Street
Bartow, FL 33830
(800) 624-5302

Corrective Action

Any discrepancies or deficiencies found during routine inspections will be recorded in the inspection log and brought to the attention of a supervisor. At this time an evaluation of the seriousness of the problem will be noted and a decision made if the situation requires immediate action or the problem can be handled as routine maintenance. The evaluation of the seriousness of the problem will be recorded in the facility's inspection log. If the problem poses a threat to human health or the environment, action will be taken immediately. The Branch Manager has the overall responsibility for resolving any discrepancies found during the routine inspection.

EMERGENCY NOTIFICATION

Emergency Coordinator

The Branch Manager or designee is the emergency coordinator. Page iii at the beginning of Section 5 includes the names, home addresses, and both office and home phone numbers of the primary emergency coordinator and alternate. At least one employee will be either present on the facility premises or on call with responsibility for coordinating all emergency response measures at all times. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

EMERGENCY RESPONSE AGENCIES AND TEAM MEMBERS

The agencies and response team members to be notified whenever an imminent or actual emergency occurs are presented on page iii, located at the beginning of this plan.

must submit a written report on the incident to the Southeast District of the FDEP, at 400 North Congress Avenue, Suite 200, West Palm Beach, Florida 33401. The report must include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the facility;
3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that resulted from the incident.

POTENTIAL SPILL SOURCES

The following is a list of activities that have the potential for a small scale (less than 55 gallons of waste) pollution incident.

1. Moving of containers.
Every time a container is moved, the possibility exists that it could tip over or be dropped. To minimize the possibility of spillage of solvent under those conditions, all container lids must be secured before the container is moved.

are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the containers kept at room temperature to minimize the potential for pressure build-up. The tanks are painted white to reflect sunlight and are vented to prevent pressure build-up.

2. Produce uncontrolled toxic mists, fumes, dusts, or gases in quantities sufficient to threaten human health--The vapor pressure of petroleum based parts washer solvent is low (2 mm mercury) and it and the paint waste may react with strong oxidizers and reactive metals only. Toxic mists, fumes, and dusts do not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization is minimal under normal working conditions.

[Note: Drycleaning wastes are initially not flammable, but may produce toxic gases and hydrochloric acid at elevated temperatures (about 1,200°F).]

3. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "1" above and "4" below.
4. Damage the structural integrity of the Safety-Kleen facility--The parts washer solvent and paint wastes do not cause deterioration of the tank, drums, or other structural components of the facility.

Incompatible Wastes

Incompatible wastes are segregated in an appropriate manner in accordance with industry standards. All waste or products are kept away from ignition sources. Employees must confine smoking or open flames to designated safe areas.

ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements have been made to familiarize the Police Department, Fire Department, and local emergency response teams with the layout of the facility, properties of hazardous materials handled (Material Safety Data Sheets) at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes. Potential primary and secondary spill control contractors as well as sorbent suppliers are identified in this Plan.

Arrangements have been made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which would result from fires, explosions, or releases at the facility.

Appendix A of this Plan (located at the end of this section) includes copies of example distribution letters for transmittal. Copies of updated transmittal letters are kept on file at the facility.

EMERGENCY RESPONSE EQUIPMENT AND COMMUNICATION

Due to the small size of the facility, routine communication will be accomplished by voice communication. Emergency alarms are available at the tank farm, return/fill station, and warehouse. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by phones throughout the facility. Included with these phone numbers is the 24-hour Safety-Kleen spill number. Figure 5.6 1 provides the locations of fire extinguishers, first-aid kits, and emergency eyewashes. Other emergency response equipment (Table 5.6 1) is kept in a small storage area inside the warehouse near the return/fill dock. This equipment includes mops and buckets, soap, shovels, and spill sorbent pads. Rubber gloves, boots, pumps, and a wet/dry vacuum cleaner are stored in an emergency supply area near the container storage area. Descriptions and uses of the equipment are provided in Table 5.8 1. Adequate aisle space is provided in the container storage area for movement in an emergency situation. The City of Medley supplies water for domestic use, decontamination, and fire fighting. The water pressure supplied by the City of Medley was inadequate for fire fighting purposes, so a booster pump has been installed at the facility. The fire protection system was installed and certified by the installation contractor in accordance with applicable fire codes.

Pails, hoses, and detergents are the primary equipment that will be used for decontamination. The equipment available at the facility for emergency situations is adequate for most cases. Large or serious emergency situations will be remediated by local emergency response teams or special emergency response or cleanup contractors. The facility is constructed and operates in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards are also observed at the facility.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment will be tested and maintained as necessary to assure its proper operation in time of emergency.

Safety-Kleen Systems, Inc.**Job Description**

Job Title: OIL/VAC Sales and Service Rep.
Department: Branch Sales & Service
Reports To: Branch General Manager
FLSA Status: Exempt
Approved By: SVP HR
Approved Date: 10/2/06

Summary: This position combines the Oil & Vac routes and depending on the service will require the employee to remove waste fluids/sludges/solids from our customers site (Vacuum Sales Service Representative Route). This involves using vacuum equipment to pump waste materials and liquid from oil-water separator pits, as well as transporting & delivering the waste material to Safety-Kleen disposal sites. Or, it will require the employee to remove, transport and deliver waste oil from customer facilities to Safety-Kleen oil recycling and refining centers (Oil Route). Reports to CSM or BGM.

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- Receive manifests, labels & route schedule from office staff
- Perform Pre & Post Trip Inspection Report
- Perform route: (drive to customer location, ensure each service meets the used oil or vac waste qualifications, take sample of each oil or vac service & place in retain sample storage area, pump waste oil or waste materials & liquid from oil-water separator pits from customer facilities to Safety-Kleen oil recycling & refining centers or Safety-Kleen disposal site).
- Properly label, scan and document waste oil (oil service) or waste materials & liquids (vac service) removed from customer site into handheld. Present receipt to customer, obtain authorized signature, as well as answer any customer service issues.
- Complete end of day paperwork (any manifests, orders etc. that were not already in the handheld). Dock handheld for overnight upload.
- Ensure environmental compliance and operate vehicles in accordance with DOT, local, state and federal requirements

Sales Responsibilities:

Focus is all customer types within a particular region or territory for new and existing accounts.

Qualifications: To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Education and/or Experience: High school diploma or (GED). No experience necessary.

Certificates, Licenses, Registrations: CDL and Haz Mat endorsement and Tanker.

Competencies and Skills: Customer Service, Attention to Detail, Recognize the importance of, and adherence to, Safety regulations and policies, Time Management, Product Knowledge, Sense of Direction, Knowledge of Hazardous Waste, and Organization skills.

Physical Demands: While performing the duties of this job, the employee must frequently kneel and stoop and constantly bend, climb, reach and twist. The employee must constantly carry, lift and pull up to 50 pounds. The employee must constantly drive a large truck and occasionally move equipment. Job will use right and left hands for repetitive movement such as Simple Grasping and Pushing/Pulling. Job will use right hand for repetitive movement such as Fine Manipulation. Job will use feet for repetitive movement such as foot controls.

Work Environment: While performing the duties of this job, the employee is frequently exposed to moving mechanical parts and outside weather conditions. The employee is occasionally exposed to wet and/or humid conditions; high, precarious places; fumes or airborne particles; extreme cold; extreme heat; and risk of electrical shock.

Used Antifreeze

The spent antifreeze (ethylene glycol) is collected from automobile service stations. All antifreeze collected and managed by Safety-Kleen within Florida is recycled. At the customer's location, Safety-Kleen pumps waste ethylene glycol (antifreeze) into a Safety-Kleen used oil tanker truck. This truck transports the used antifreeze/used oil mixture to the branch for off-loading into a tank for storage. The comingled material is sent to the SK East Chicago re-refinery where the glycol is separated by distillation. The glycol is then sent to a recycler for processing into a pure product which is then sold on the open market. This procedure is in accordance with FDEP's *the Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. The Florida Department of Environmental Protection (FDEP) has determined this waste stream can be handled as non-hazardous as long as it is destined for recycling.

Aqueous Brake Cleaner

The Aqueous Brake Cleaner (ABC) is primarily an aqueous solution with approximately 10% nonorganic additives and detergents. The spent ABC is transported from the customers in containers. Spent ABC from customer's parts washers is managed as a 10-day transfer waste and is stored in the transfer waste storage area. The used aqueous parts washer solvent may or may not be considered characteristic waste by TCLP and may carry the waste codes referred to in Table 7.1-1.

Aqueous Parts Washer Solvent

The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols). The spent aqueous parts washer solvent is transported to customers in containers and will be accumulated in the 20,000-gallon used solvent storage tank via the return/fill station. The used aqueous parts washer solvent may, or

coating. Level gauges are used to measure liquid levels in tanks. Float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tanks being 95% full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. The gauges of the tank are read before filling the tank with additional material. Tank level readings are also taken prior to the filling of a tanker truck to prevent overfilling of the truck or tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the above-ground tanks. The tank should be operated at a maximum volume of 19,000 gallons (95% of capacity). The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill, or in as timely a manner as possible, to prevent harm to human health and the environment.

IGNITABLE OR REACTIVE WASTE REQUIREMENT (40 CFR PART 264.198(b))

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)).

TANK SYSTEM SECONDARY CONTAINMENT

Tank Containment

All tanks are aboveground, underlain by a 58' x 40' concrete slab, surrounded by a 36¼" to 38" high concrete walls. The wall height in the containment varies with the floor

management facilities to ensure proper operation and maintain compliance. The Branch Manager or that person's designee is responsible for carrying out the inspections of all hazardous waste management facilities in accordance with the following procedure and schedule. Figure 9.4-1 is an example Daily Inspection Log for the tank system. This Daily Inspection Log, or equivalent, will be used during daily inspections. Daily inspections of the tank and dumpsters will consist of the following:

- Note volume in tank.
- Observe tank exterior for loose anchoring, wet spots, leaks.
- Check the automatic high level alarm. In addition, measure the depth of used solvent in the tanks to confirm the proper functioning of the automatic alarm system and to determine unexpected deviations in tank measuring data, or a sudden drop in liquid level, which may indicate leakage.
- Inspect secondary containment walls and piping (All piping is above ground).
- Inspect transfer pumps for leaking seals and overheated motors.
- Inspect the solvent dispensing hose, fittings, and valve for any leaks, damage, or wear that could cause a leak to develop.
- Inspect the valves for evidence of leaking. Stem leaks from worn glands and warped valve bodies should be repaired. If the valve cannot be repaired, replace the unit.

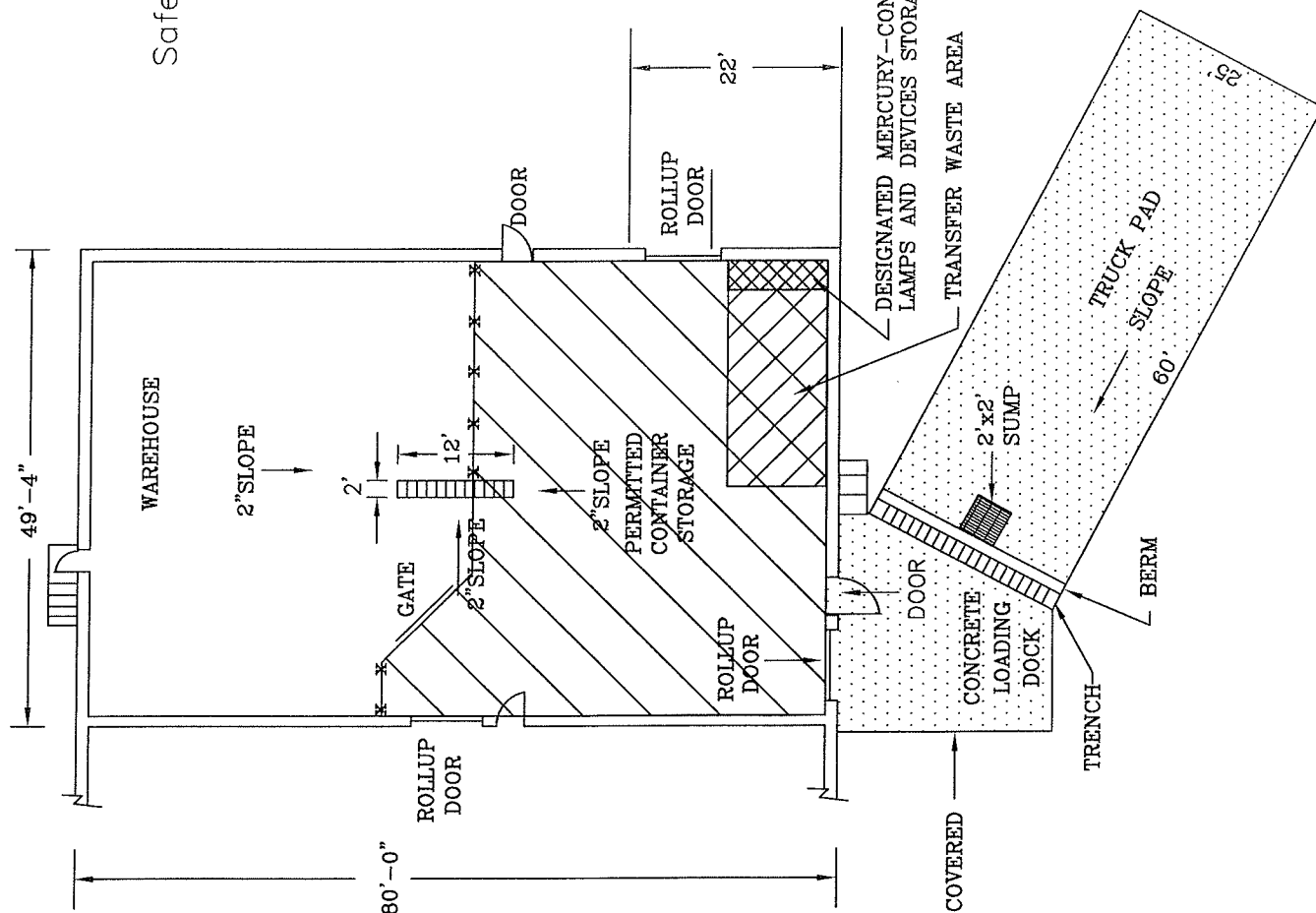
Also, the tanks will be visually inspected and tested periodically. The period of time between tank inspections, including shell thickness testing, will not exceed ten years. This time frame for tank inspection is adequate based on Safety-Kleen's experience at its other facilities in Florida.

Daily inspection of the solvent return receptacle (wet dumpster) will consist of an inspection for leaks and excess dumpster mud build-up.

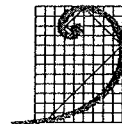
TABLE 5.2-1
INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety Equipment	Fire Extinguishers	Overdue inspection Inadequate charge Inaccessible	Weekly
	Eyewash	Disconnected/malfunctioning valves Pressure Inaccessible	Weekly
	First-Aid Kit	Inadequate inventory	Weekly
	Spill Cleanup Equip PPE	Inadequate supply Inadequate supply	Weekly Weekly
Security Equipment	Gates and Locks	Sticking, corrosion, lack of warning signs	Weekly
	Fence	Broken ties, corrosion, holes	Weekly
Storage Tanks	Volume in Tank Tank Exterior	Never more than 95% full Rusty, loose anchoring, grounding, wet spots, leaks, discoloration	Daily Daily
	High Level Alarms Volume Gauges	Malfunctioning siren/light Disconnected/ sticking, condensation	Daily Daily
Secondary Containment	Bottom and Walls	Cracks, debris, ponding, wet spots, stains, deterioration, displacement, leaks	Daily
	Rigid Piping and Supports	Distortion, corrosion, paint failures, leaks	Daily
Transfer Pumps and Hoses	Pump Seals	Leaks	Daily
	Motors	Overheating	Daily
	Fittings	Leaks	Daily
	Valves	Leaks, sticking	Daily
	Hose Connections and Fittings	Cracks, loose, leaks	Daily
	Hose Body	Crushed, cracked, thin spots, leaks	Daily

Figure 8.1-1
Container Storage Area
Safety-Kleen Systems, Inc. Facility
Medley, Florida



0 APPROXIMATE SCALE 20
FEET



ERM

- c. Container Storage Area: The container storage area is a 49¼' x 80' foot area with sloped floor and collection sump. The maximum storage capacity is 29,400 gallons with 6,912 gallons anticipated to be waste parts washer solvent dumpster mud containers, dry cleaning wastes, spent immersion cleaner, paint wastes, and/or Fluid Recovery Service (FRS) wastes.

2. Maximum Inventory of Wastes

- a. Used Parts Washer Solvent: 20,000 gallons
- b. Wet Dumpsters: 1008 gallons
- c. Containerized Waste: 6,912 gallons. (Note: This includes any combination of 5, 16, 30, 55, 85-gallon containers, and 350-gallon totes used for various management purposes).

All wastes will be disposed offsite in accordance with appropriate hazardous waste regulations.

CLOSURE PROCEDURES

Container Storage Areas

- At closure, all containers present at the facility will be sent to a Safety-Kleen TSDF, or third party facility where the contents in the containers will be reclaimed and the containers cleaned for reuse. The containers will be removed and transported with proper packaging, labeling, and manifesting.
- The concrete floor, spill containment area, and walls will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, one rinsate sample will be collected from the container storage area. The rinsate sample will be analyzed by EPA method 6010 for the eight RCRA metals and nickel, and for volatile and semivolatile organics by EPA methods 8015, 8260, and 8270. The area will be decontaminated to meet FDEP's guidance at the time of closure

Decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure as part of the overall decontamination of the container storage areas. No additional, special decontamination of the mercury-containing lamps and devices storage area will be conducted at the time of closure, because any decontamination associated with releases from mercury-containing lamps and devices will be conducted at the time of release.

- Decontamination (i.e., detergent wash and clean rinse) fluids will be collected and contained for proper management. One representative sample of the contained fluids will be collected to determine whether the water is hazardous. This determination will be made by laboratory analysis of the sample for the metals and organics (excluding pesticides/herbicides) on the TCLP list. (Note: This wash water will be from all areas undergoing decontamination, not just from the container storage areas.)
- If the wash water or other wastes generated in the closure process are determined to be hazardous, they will be disposed of properly as a hazardous waste. Otherwise, the material will be disposed of as an industrial waste. Assumptions of wash water generation are based on Safety-Kleen's past experience from other facility closures. The generated wash water is expected to be non-hazardous based on Safety-Kleen's experience from other facility closures.
- Equipment to be used to clean this area includes mops, pails, scrub brushes, a wet/dry vacuum, and containers. The mops, pails, and scrub brushes will be containerized and disposed of as hazardous waste. The wet/dry vacuum and containers used will be washed with a detergent solution and rinsed to decontaminate them.

Solvent Return/Fill Station

- At closure, any sludge in the wet dumpsters ("dumpster mud") will be cleaned out and containerized, labeled, and manifested for proper disposal.

- The metal superstructure components of the station (i.e., the wet dumpsters and the dock grating) will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle these components as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of the components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap.
- The concrete floor in the return/fill station will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will continue to be scrubbed and rinsed until rinsate concentrations meet GCTLs established in Chapter 62-777, FAC.

Aboveground Storage Tank System

Note: The product solvent & used oil tanks will be closed in accordance with Chapter 62-762, F.A.C.

Metal Components of the Tank Storage System

- At closure, the contents of the tank will be removed to a tanker truck using existing unloading equipment and subsequently transported to a Safety-Kleen recycle center, or 3rd party facility.
- Once the contents have been drained, the tank will be opened by removing the manways and vented by supplying fresh air to the interior space of the tank. Any residual wastes will be removed via vacuum for recycling with the previously drained wastes.
- The interior of the tank as well as all associated piping and appurtenant equipment will then be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the tank, piping, and appurtenant equipment as scrap metal in accordance with 40 CFR 261.6(a)(3)(ii), or to reuse

them at another Safety-Kleen facility. Accordingly, decontamination of the metal components is required only to the extent necessary for the safe demolition, storage, and transportation of the scrap.

Concrete Containment System

- Final disposition of the concrete containment system within which the waste tank is located will depend in part upon the presence or absence of underlying soil contamination. To make that determination, the upper six inches of soil immediately below the concrete slab will be sampled at two locations, as follows:
 1. Under the waste tank;
 2. At the containment system pumps.
 3. Beneath the most prominent of any cracks observed in the slab, and under the tanker connections.
- These sample locations may be adjusted as actual field conditions warrant, but a minimum of two samples will be retrieved. These samples will be analyzed by EPA Method 6010 for the eight RCRA metals and nickel, and for volatile and semivolatile organics by EPA Methods 8015, 8260, and 8270.
- The perimeter walls and foundation slab of the secondary containment area will be scrubbed with a detergent solution and rinsed with clean water to remove waste residuals from the surface. A final rinsate sample will be collected and analyzed to determine the effectiveness of decontamination. Unless otherwise designated in the formal closure plan, the rinsate sample will be analyzed for the same constituents as the container storage area rinsate sample. The area will continue to be scrubbed, rinsed, and resampled until rinsate concentrations meet GCTLs established in Chapter 62-777, FAC. Safety-Kleen anticipates that proper maintenance of the concrete containment system will allow the slab to remain in place at closure.

Revision Number	0
Date	09/20/12
Page	1 of 2

P. Information Requirements Regarding Potential Releases From Solid Waste Management Units

Facility Name Safety-Kleen Systems, Inc.

EPA/DEP I.D. No. FLD 984 171 694

Facility location Medley Florida

city state

1. Are there any of the following solid waste management units (existing or closed) at your facility? A solid waste management unit (SWMU) is a discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released, as described in the July 27, 1990 Federal Register (55 FR 30798).

DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION.

landfill	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
surface impoundment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
land farm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
waste pile	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
incinerator	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
storage tank	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
container storage area	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
injection wells	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
wastewater treatment units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
transfer station	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
waste recycling operations	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
land treatment facility	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
boiler/industrial furnace	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
other (units not listed above)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. If there is a "yes" answer to any of the items in 1. above, on separate sheet(s) of paper, provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, focus on whether or not the wastes would be considered hazardous wastes or hazardous constituents under RCRA. (Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.) Include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Provide a description of each unit and include capacity, dimensions, and location at the facility. Provide a site plan, if available, and the dates of operation of the unit [40 CFR 270.14(d)(1)].

Part II

**P. #2 INFORMATION REQUIREMENTS REGARDING SOLID WASTE
MANAGEMENT UNITS**

SWMU-1(Container Storage Area Inside Service Center) is described within the permit application in section Part II B.

SWMU-2 (Above Ground Storage Tank Area) is described within the permit application in section Part II C.

SWMU-3 (Return/Fill Area) is described within the permit application in section Part II C.

SWMU-4 (Mercury Lamp Storage Area (Inside SWMU-1)) is designated for storage of mercury bulbs & devices. It is situated in the southeast corner of the container storage area. The area is approximately 4' x 19' 4". Mercury bulbs are stored in 4 ft. and 8ft. boxes and devices are stored in 5-gallon poly containers.

SWMU-5 (Used Antifreeze Tanker) is located in the parking lot of the facility in the southeastern corner of the lot. This SWMU consisted of a 8,000 gallon tanker trailer that had been used for the storage of Used Antifreeze. Sometime in 2009 this tanker trailer was removed from service and in July 2012 was removed from the site.

SWMU-6 (Used Oil Filter Storage Area (Inside SWMU-3))is located within SWMU-3 and is used for storage of Used Oil Filters in 30, and 55-gallons steel or poly containers. Any overflow of Used Oil Filter containers will be stored in the container storage area. Prior to 2009 Used Oil Filters were stored in 350-gallon bins on the tank farm pad (south side of tank farm). In late 2010 the storage of filters changed to this current location.

SWMU-7 (Transfer Waste Storage Area (Inside SWMU-1)) is described within the permit application in section Part I D, page #3.

SWMU-8 (Municipal Dumpster) is a municipal dumpster located in the northeast portion of the parking lot.

SWMU-9 (Containerized Waste Loading/Unloading Dock) is the containerized waste loading/unloading dock and is located on the southeast corner of the facility building. In this area waste containers are loaded for shipment to permitted TSDF's for reclamation/disposal and product is unloaded into the branch for storage. In addition, this area may also be used for unloading of waste containers from branch route trucks.

SWMU-10 (Satellite Container Storage Area (Inside SWMU-3)) is for Satellite container used for branch debris (sludge from wet dumpsters, used PPE, sampling equipment, etc.). This is inside SWMU-3 and is located adjacent to the northern most wet dumpster. Satellite containers are mostly 55-gallon steel containers, but 30-gallons steel containers may be used if no 55 gallon containers are available.

SWMU-11 (Tank Farm Discharge Area) is an area located immediately west of the above ground tank farm. This area receives sheen-less stormwater that is pumped out of the secondary containment of the tank farm and tank farm pad after rain events provided that no sheen exists. In June 2009, as part of SK Medley's Miami-Dade DERM Industrial Waste Operating Permit, samples were taken from monitoring well-1 (MW-1). Analysis from this event detected three volatile organic compounds (VOCs). A summary of the event can be found in Part II Q of this renewal application. In addition, a copy of the current Miami-Dade DERM Industrial Waste Operating Permit is included in this Section.

SWMU-12 (French Drain) is the French Drain System for the facility. This system provides stormwater drainage off the paved areas of the facility. There are six catch basins located on the property. Figure 2.2-5 Drainage Plan provides information on the system. These catch basins are identified on Figure Part II Q.

Part II

Q. INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS

Part I.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 February 12, 1993, the facility was issued a HSWA permit from Region 4 of the United States Environmental Protection Agency (USEPA). The HSWA permit (Permit No. FLD 984171694) expired on February 12, 2003 and all HSWA corrective action conditions were incorporated into the state permit issued on June 24, 2002.

Twelve SWMU's have been identified at the facility along with one Area of Concern (AOC). The Twelve SWMU's are listed below with information on the AOC following.

SWMU NUMBER	DESCRIPTION
1	Container Storage Area
2	Above Ground Storage Tanks
3	Return/Fill Area
4	Mercury Lamp Storage Area (Inside SWMU-1)
5	Used Antifreeze Tanker (removed 2012)
6	Used Oil Filter Storage Area (Inside SWMU-3)
7	Transfer Waste Storage (Inside SWMU-1)
8	Municipal Dumpster
9	Containerized Waste Loading/Unloading Dock
10	Satellite Container Area (Inside SWMU-3)
11	Secondary Containment Stormwater Discharge Area
12	French Drain System

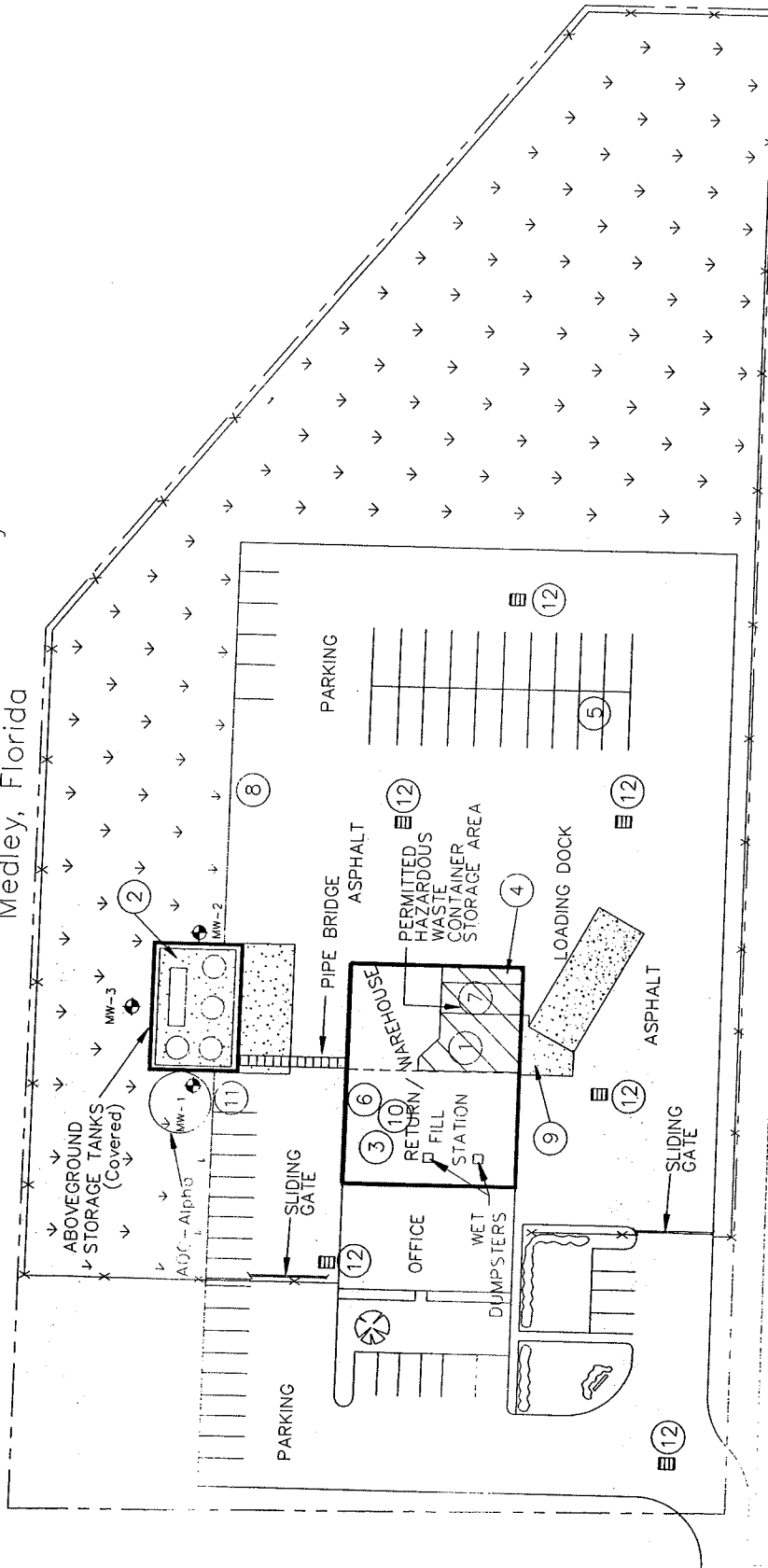
Part II

Q. (CONTIUNED)

In addition to the solid waste management units (SWMU's) listed above Safety-Kleen has since become aware of a new area of concern (AOC-Alpha). On June 4, 2009 Safety-Kleen notified the Department that it had detected three volatile organic compounds (VOC's) as part of its semi-annual ground water sampling at the facility, which is in accordance with its Miami-Dade DERM Industrial Waste Operating Permit. This new AOC is located in the vicinity of monitoring well – 1 (MW-1), which is near the above ground storage tank area located on the north side of the facility. As referenced in Figure 2.1-1 of the permit application document MW-1 is found on the west side of the above ground storage tank area. More detailed information can be found in the site assessment report (SAR) dated April 8, 2010, which Environmental Consulting Technologies, Inc. (ECT) submitted to the Department on Safety-Kleen's behalf. The following lists subsequent reports submitted to the Department regarding AOC-Alpha as of this permit application submittal:

- Remedial Action Plan (with, Site Assessment Report Addendum), August 9, 2010.
- First Remedial Action Status Report, August 3, 2011.
- As Built Drawings, September 28, 2011.
- Second Remedial Action Status Report (with, Post Active Remediation Monitoring Plan), February 14, 2012.
- Post Active Remediation Monitoring Report #1, March 22, 2012.
- Post Active Remediation Monitoring Report #2, May 21, 2012.
- Post Active Remediation Monitoring Report #3, June 7, 2012.
- Site Rehabilitation Completion Report, with Post Active Remediation Monitoring Report #4 and Soil Report, July 31, 2012.
- FDEP acceptance letter (dated September 24, 2012) for the July 31, 2012 Site Rehabilitation Report

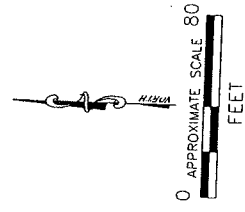
Figure Part II - Q
Locations of Solid Waste Management Units (SWMU)
Safety-Kleen Systems, Inc. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- GRASS
- EXISTING ABOVEGROUND STORAGE TANK
- EXISTING ABOVEGROUND STORAGE TANK
- GROUND WATER MONITORING WELL
- STORM WATER CATCH BASIN

SWMU #	DESCRIPTION
1	CONTAINER STORAGE AREA INSIDE SERVICE CENTER
2	ABOVE GROUND STORAGE TANK AREA
3	RETURN/FILL AREA
4	MERCURY LAMPS STORAGE AREA (INSIDE SWMU-1)
5	USED ANTIFREEZE TANKER (REMOVED 2012)
6	USED OIL FILTER STORAGE AREA (INSIDE SWMU-3)
7	TRANSFER WASTE STORAGE AREA (INSIDE SWMU-1)
8	MUNICIPAL DUMPS
9	CONTAINERIZED WASTE LOADING/UNLOADING DOCK
10	SATELLITE CONTAINER AREA (INSIDE SWMU-3)
11	TANK FARM DISCHARGE AREA
12	FRENCH DRAIN



EQUIPMENT SCHEDULE

MARK	DESCRIPTION
①	1 1/4" BALL VALVE (BARREL WASHER)
②	2" GATE VALVE
③	1 1/2" BALL VALVE (BARREL WASHER)
④	RECIRCULATING PUMP (BARREL WASHER)
⑤	1 1/2" BALL VALVE (BARREL WASHER)
⑥	1 1/4" BALL VALVE (BARREL WASHER)
⑦	2" GATE VALVE
⑧	RECIRCULATING PUMP (BARREL WASHER)
⑨	2" FLANGED BALL VALVE
⑩	2" FLANGED BALL VALVE
⑪	2" FLANGED BALL VALVE
⑫	STRAINER ASSY.
⑬	USED SOLVENT PUMP
⑭	2" FLANGED CHECK VALVE
⑮	3/8" AUTOMATIC VACUM BREAKER
⑯	3" FLANGED BALL VALVE
⑰	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
⑱	3" FLANGED CHECK VALVE
⑲	3" FLANGED BALL VALVE
⑳	3" FLANGED CAM LOCK
㉑	3" FLANGED BALL VALVE
㉒	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
㉓	3" FLANGED CAM LOCK
㉔	3" FLANGED BALL VALVE
㉕	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
㉖	3" FLANGED CAM LOCK
㉗	3" PRESSURE VACUUM BREAKER
㉘	3" TANK FLANGE ADJACENT TO "16"
㉙	3" PIPE FLANGE ADJACENT TO "17"
㉚	3" PIPE FLANGE ADJACENT TO "18"
㉛	3" TANK FLANGE ADJACENT TO "21"
㉜	3" TANK FLANGE ADJACENT TO "24"
㉝	3" BLIND TANK FLANGE
㉞	3" BLIND TANK FLANGE
㉟	3' LONG BOLT MANWAY
㊱	NO LONGER IN USE
㊲	NO LONGER IN USE
㊳	NO LONGER IN USE
㊴	NO LONGER IN USE
㊵	2" CHECK VALVE
㊶	1" BALL VALVE
㊷	1" BALL VALVE

GENERAL NOTES

- 1.) ACTUAL PIPING CONFIGURATION MAY VARY.
- 2.) NON-PERMITTED TANKS AND EQUIPMENT MAY CHANGE.

REVISIONS

NO.	DESCRIPTION	BY	CHK	APPR	DATE
E	ADDED 10K CMS150 HORIZ. TANK	MCL	KJM	DP	05/09/96
D	REMOVED E.G. TANK & EQUIP.	MBH	KJM	DP	02/21/95
C	REMOVED ABOVE GRATING REF.	MBH	KJM	DP/WC	01/04/92
B	ADDED TAGS 40,41 & 42	MBH	KJM	-	01/04/92
A	RELEASED FOR PART 'B' PERMIT	MBH	-	-	07/10/92

FIGURE 11.1-1

TITLE

ENVIRONMENTAL PIPING
SCHEMATIC - EXISTING



Safety-Kleen Corp.
1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123
PHONE (708)897-8480

SCALE	BY	CHKD	APPROVED	EDS	DATE
NONE	MBH	KJM	DP	WC	07-09-92
SERVICE CENTER LOCATION			SC-DWG NUMBER		REV. NO.
MEDLEY, FL.			309702-GDPB200		E

20K
FRESH
SOLVENT
TANK

TANKFARM

Revision 0 – 09/20/12

Figure 11.1-2
Safety-Kleen Medley, Florida
Daily Inspection of Tank Equipment

INSPECTORS NAME/TITLE:

INSPECTORS SIGNATURE				
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY

DATE (MM/DD/YY)

TIME

Pump, Flange, or Valve Number	MON	TUES	WED	THURS	FRI
1. 1 ¼" Ball Valve-drum washer	A N	A N	A N	A N	A N
2. 2" Gate Valve	A N	A N	A N	A N	A N
3. 1' ½" Ball Valve-drum washer	A N	A N	A N	A N	A N
4. Waste Mineral Spirits Rec. Pump	A N	A N	A N	A N	A N
5. 1 ½" Ball Valve-drum washer	A N	A N	A N	A N	A N
6. 1' ¼" Ball Valve-drum washer	A N	A N	A N	A N	A N
7. 2" Gate Valve	A N	A N	A N	A N	A N
8. Waste Mineral Spirits Rec. Pump	A N	A N	A N	A N	A N
9. 2" Flanged Ball Valve	A N	A N	A N	A N	A N
10. 2" Flanged Ball Valve	A N	A N	A N	A N	A N
11. 2" Flanged Ball Valve	A N	A N	A N	A N	A N
12. Strainer Assy.	A N	A N	A N	A N	A N
13. Used Solvent Pump	A N	A N	A N	A N	A N
14. 2" Flanged Check Valve	A N	A N	A N	A N	A N
15. 3/8" Vacuum Breaker	A N	A N	A N	A N	A N
16. 3" Flanged Ball Valve	A N	A N	A N	A N	A N
17. 3" Fl. External Emerg. Gate Valve	A N	A N	A N	A N	A N
18. 3" Flanged Check Valve	A N	A N	A N	A N	A N
19. 3" Flanged Ball Valve	A N	A N	A N	A N	A N
20. 3" Flanged Cam Lock	A N	A N	A N	A N	A N
21. 3" Flanged Ball Valve	A N	A N	A N	A N	A N
22. 3" Fl. Extern. Emer. Gate Valve	A N	A N	A N	A N	A N
23. 3" Flanged Cam Lock	A N	A N	A N	A N	A N
24. 3" Flanged Ball Valve	A N	A N	A N	A N	A N
25. 3" Fl. Extern. Emerg. Gate Valve	A N	A N	A N	A N	A N
26. 3" Flanged Cam Lock	A N	A N	A N	A N	A N
27. 3" Pressure Vacuum Breaker	A N	A N	A N	A N	A N
28. 3" Tank Flange	A N	A N	A N	A N	A N
29. 3" Pipe Flange	A N	A N	A N	A N	A N
30. 3" Pipe Flange	A N	A N	A N	A N	A N
31. 3" Tank Flange	A N	A N	A N	A N	A N
32. 3" Tank Flange	A N	A N	A N	A N	A N
33. 3" Blind Tank Flange	A N	A N	A N	A N	A N
34. 3" Blind Tank Flange	A N	A N	A N	A N	A N
35. 3" Long Bolt Manway	A N	A N	A N	A N	A N
36. No longer in use	A N	A N	A N	A N	A N

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37. No longer in use	A	N	A	N	A	N	A	N	A	N
38. No longer in use	A	N	A	N	A	N	A	N	A	N
39. No Longer in use	A	N	A	N	A	N	A	N	A	N
40. 2" Check Valve	A	N	A	N	A	N	A	N	A	N
41. 1" Ball Valve	A	N	A	N	A	N	A	N	A	N
42. 1" Ball Valve	A	N	A	N	A	N	A	N	A	N

If "N" enter pump or valve # _____ and circle appropriate problem: potential leak, active leak, sticking, wear, does not operate smoothly, or other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record (Figure 11.1-3) must be completed.

A = Acceptable N = Not Acceptable

Table 11.2-3

Subpart CC Control Options

Tanks

1. These tanks shall comply with Tank Level 1 controls which require tanks to have a fixed roof with no visible cracks, holes, gaps, or other spaces in accordance with 40 CFR 264.1084(c). The tank shall be visually inspected for defects prior to the tank becoming subject to these requirements and at least once a year thereafter [40 CFR 264.1084(c)].
2. These tanks are fixed roof tanks equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(e). The internal floating roof shall be visually inspected for defects at least once every twelve months after initial fill unless complying with the alternative inspection procedures in 40 CFR 264.1084(e)(3)(iii). [40 CFR 264.1084.(d)(1)]
3. These tanks are equipped with an internal floating roof and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(f). The external roof seal gaps shall be measured in accordance with procedures contained in 40 CFR 264.1084(f)(3)(I) within 60 days and at least once every 5 years thereafter. The external floating roof shall be visually inspected for defects at least once every 12 months after initial fill. [40 CFR 264.1084(d)(2)]
4. These tanks are vented through a closed-vent system to control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(g). The tank shall be equipped with a fixed roof and closure devices which shall be visually inspected for defects initially and at least once every year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087. [40 CFR 264.1084(d)(3)]
5. These tanks are pressure tanks which shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(h). [40 CFR 264.1084(d)(4)]
6. These tanks are located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device and shall comply with Tank Level 2 controls in accordance with 40 CFR 264.1084(i). The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087 [40 CFR 264.1084(d)(5)]
7. These tanks have covers which have been specified as “unsafe to inspect and monitor” and shall comply with the requirements of 40 CFR 264.1084(l)(1) [40 CFR 264.1084(f) & (g)]

Surface Impoundments

8. These surface impoundments shall have a floating membrane cover in accordance with 40 CFR 264.1085(c). The floating membrane cover shall be visually inspected for defects initially and at least once each year. [40 CFR 264.1085(b)(1)]
9. These surface impoundments shall have a cover that is vented through a closed-vent system to a control device in accordance with 40 CFR 264.1085(d). The surface impoundment cover and its closure device shall be visually inspected for defects initially and at least once a year. The closed-vent system and control device shall be inspected and monitored in accordance with 40 CFR 264.1087. [40 CFR 264.1085(b)(2)]
10. These surface impoundments have covers which has been designated as “unsafe to inspect and monitor” and shall comply with the requirements of 40 CFR 264.1085(g). [40 CFR 264.1085(c) & (d)]

Table 11.2-3

Subpart CC Control Options

Containers

11. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and meet the applicable US DOT regulations under the Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1) & (c)(1)(i)]
12. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(i)]
13. These containers have a design capacity greater than 0.1 m³ and less than or equal to 0.46 m³ and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(i) & (c)(1)(iii)]
14. These containers have a design capacity greater than 0.46 m³, are not in light material service and meet the applicable US DOT regulations under Container Level 1 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(i)]
15. These containers have a design capacity greater than 0.46 m³, are not in light material service and are equipped with a cover and closure devices which form a continuous barrier over container openings. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(ii)]
16. These containers have a design capacity greater than 0.46 m³, are not in light material service and are open-top containers in which an organic-vapor surpressing is placed on or over the hazardous waste in a container. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(ii) & (c)(1)(iii)]
17. These containers have a design capacity greater than 0.46 m³, are in light material service and meet the applicable US DOT regulations under Container Level 2 standards. The container shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1086(b)(1)(iii) & (d)(1)(i)]

Table 11.2-3

Subpart CC Control Options

18. These containers have a design capacity greater than 0.46 m³, are in light material service and operate with no detectable organic emissions as defined in 40 CFR 265.1081. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(iii) & (d)(1)(ii)]
19. These containers have a design capacity greater than 0.46 m³, are in light material service and that have been demonstrated within the preceding 12 months to be vapor tight using 40 CFR Part 60, Appendix A, Method 27. The container and its cover and closure devices shall be visually inspected for defects at the time the container first manages hazardous waste or is accepted at a facility. If a container remains at a facility for 1 year or more, it shall be visually inspected for defects at least once every twelve months. [40 CFR 264.1088(b)(1)(ii) & (c)(1)(i)]
20. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented directly through a closed-vent system to a control device in accordance with 40 CFR 264.1086(e)(2)(ii). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(i)]
21. These containers have a design capacity greater than 0.1 m³ that are used for treatment of a hazardous waste by a waste stabilization process and are vented inside an enclosure which is exhausted through a closed-vent system to a control device in accordance with 40 CFR 264.1086(a)(2)(i) & (ii).). The closed-vent system and control devices shall be inspected and monitored as specified in 40 CFR 264.1087. [40 CFR 264.1088(b)(2) & (e)(1)(ii)]

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

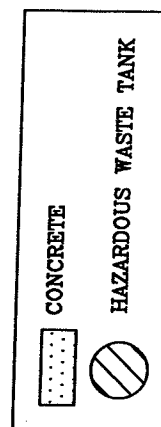
Since neither a closed vent system nor a control device is required for, or as part of, the equipment ancillary to the facility's hazardous waste storage tank (equipment subject to Subpart BB), demonstrations of compliance with applicable design, operation and maintenance specifications are not required. The Medley 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, it is not required to maintain in the records the concentration of organic chemicals in the waste stream (40 CFR 264.1064(b)(1)(iv)).

AIR EMISSION STANDARDS FOR TANKS, AND CONTAINERS

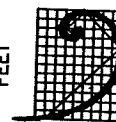
Safety-Kleen's Medley facility manages wastes that range in Volatile Organic concentrations up to 100%. Therefore, all wastes managed in containers and in storage tanks are handled as being subject to 40 CFR 264 Subpart CC requirements based on the knowledge of the wastes managed at the facility. Therefore, no analytical waste determination is required.

Subpart CC Tank Standards (40 CFR 265.1084)

The Safety-Kleen Medley facility manages hazardous wastes in a tank system that consists of one 15,000-gallon storage tank. The tank in this system is subject to Subpart CC requirements as a Level 1 Tank based on tank dimensions and maximum vapor pressure of volatile organic materials managed in this tank (see following table). A list of tank, tank dimensions and maximum vapor pressure of volatile organics managed in tanks subject to Level 1 Tank controls is provided in the following table.

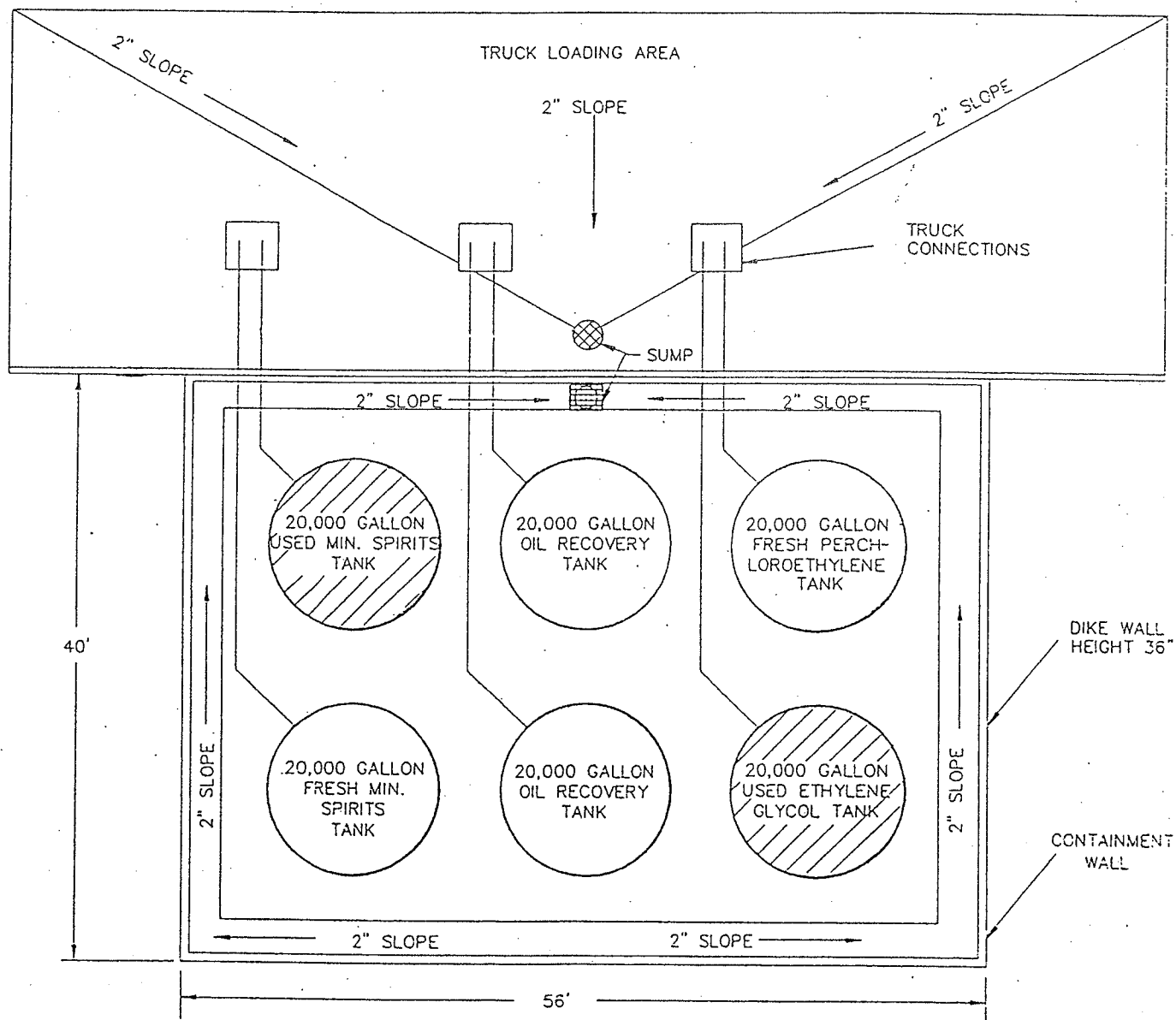


0 APPROXIMATE SCALE 12
FEET

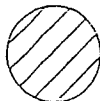


ERM

Figure II.C.2-1
 Tank Farm
 Safety-Kleen Corp. Facility
 Medley, Florida



0 12
 FEET



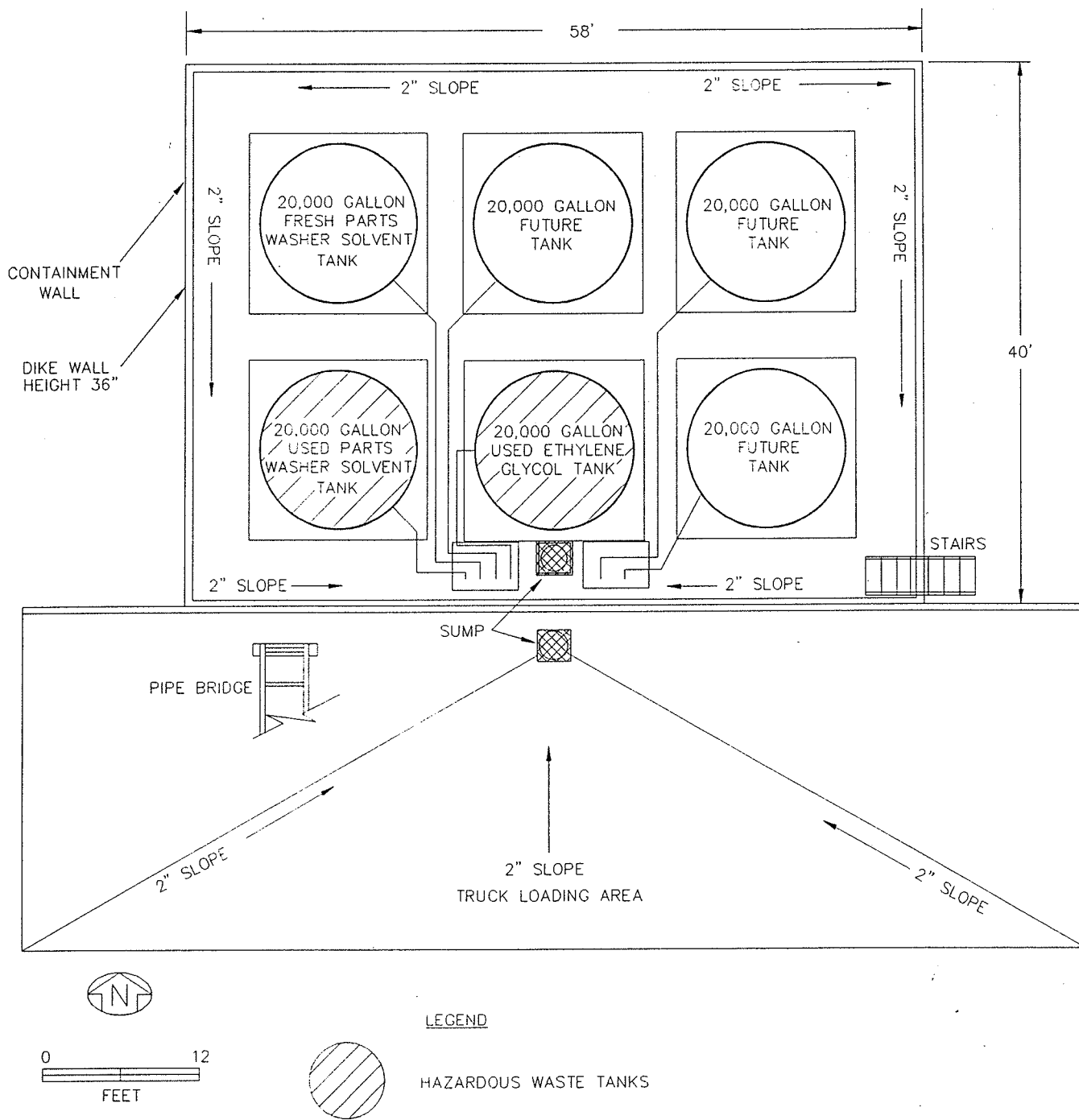
LEGEND

HAZARDOUS WASTE TANKS

NOTE: ENTIRE AREA IS CONCRETE

The
ERM

Figure II.C.7-1
Tank Farm
Safety-Kleen Corp. Facility
Medley, Florida



NOTE: ENTIRE AREA IS CONCRETE

REVISÉD 03/08/93

13112.21/31121TF/030993-8

II.C.7-1A

The
ERM
Group

Project SW - ModelW.O. No. 13112.21Sheet 1 of 2Subject Available Storage CapacityBy DSDate 7-16-92Chkd by VHDate 7/16/92TANK FILL (Figure II.C.7-1):

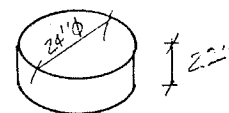
$$\text{Total Vol} = \text{Vol}_{\text{CONT.}} + \text{Vol}_{\text{Sump}} - \text{Vol}_{\text{TANK}} - \text{Vol}_{\text{PAD}} - \text{Vol}_{\text{RAINFALL}}$$

1. Containment Area:

$$\begin{aligned} V_c &= (58' - 16'')(40' - 16'')\left(\frac{36 + 38}{2}''\right) \\ &= (56.67')(38.67')(3.08') \\ &= 6749.60 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 50,487.0 \text{ gal} \end{aligned}$$

2. Sump (Qty = 1):

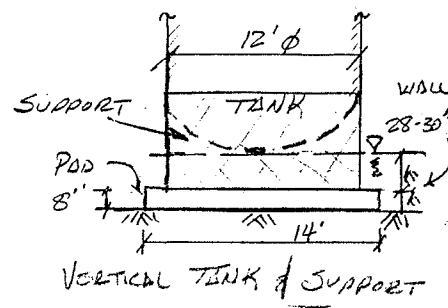
$$\begin{aligned} V_s &= \left(\pi \frac{d^2}{4}\right)(h) \\ &= \pi \frac{(2')^2}{4} \left(\frac{22}{12}\right) = 5.76 \text{ ft}^3 \\ &= 5.76 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 43.1 \text{ gal} \end{aligned}$$

Circular Sump

Project SK - Medley W.O. No. 13112.21 Sheet 2 of 2
Subject Available Storage Capacity By DS Date 7-16-92
TANK FARM Chkd by VH Date 7/16/92

3. TANK ($q = 6$, w/ 1 ruptured & 5 intact)

$$\begin{aligned} (a) \quad V_T &= 5 \left(\pi \frac{(12')^2}{4} \right) \left(\frac{28+30''}{2(12')} \right) \\ &= 1366.59 \text{ ft}^3 (7.48 \text{ gal/ft}^3) \\ &= 10,222.1 \text{ gal} \end{aligned}$$



$$\begin{aligned} (b) \quad V_P &= 6(14')(14') \left(\frac{8'}{12} \right) \\ &= 784 \text{ ft}^3 (7.48 \text{ gal/ft}^3) = 5864.3 \text{ gal} \end{aligned}$$

4. Rainfall:

Based on 2542 - 24 Hr rainfall of 10 inches

$$\begin{aligned} V_R &= (\text{Containment Area}) (\text{Rainfall}) \\ &= (56,667' \times 38,667') \left(\frac{10}{12} \right) \\ &= 1826.2 \text{ ft}^3 (7.48 \text{ gal/ft}^3) = 13,659.9 \text{ gal} \end{aligned}$$

$$\text{Total Available Storage Vol.} = V_C + V_S - V_T - V_P - V_R$$

$$\text{Vol.} = (50,487.0 + 43.1 - 10,222.1 - 5864.3 - 13,659.9) \text{ gal}$$

$$\text{Vol.} = 20,783.8 \text{ gal}$$

i. Total Available Storage volume (20,783.8 gal)
exceeds single tank volume (20,000 gal).