

Thursby, Kim

From: Curtis, Jeff <Jeff.Curtis@safety-kleen.com>
Sent: Tuesday, January 07, 2014 1:03 PM
To: Russell, Merlin
Cc: Thursby, Kim
Subject: RE: Safety-Kleen Systems – Sanford , FLD 984 171 165,First Request for Additional Information

Hi Merlin,

Sorry, I thought I replied to this e-mail when I got back on January 2nd. I actually got to take a couple weeks off at the end of December. Hope you had some time to enjoy the holidays with your family. Yes, here we are for another year back at it! I am working on the response and will give you a call if I have any issues to discuss.

Thanks,

Jeff Curtis EHS Manager | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.738.3026 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



Safety Starts With Me! Live it 3-6-5

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Tuesday, January 07, 2014 10:45 AM
To: Curtis, Jeff
Cc: Thursby, Kim
Subject: FW: Safety-Kleen Systems – Sanford , FLD 984 171 165,First Request for Additional Information

Jeff,

Happy New Year! Hope the holidays came with at least a few days of relaxation. BUT, here we go again.

Please let Kim know you received this e-mail.

merlin

From: Thursby, Kim **On Behalf Of** Epost HWRS
Sent: Monday, December 16, 2013 11:03 AM
To: Jeff.Curtis@safety-kleen.com
Cc: Bahr, Tim; Goddard, Charles; bob.fox@erm.com; White, John; Russell, Merlin; Tripp, Anthony
Subject: Safety-Kleen Systems – Sanford , FLD 984 171 165,First Request for Additional Information

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the Department by clicking on this link. [DEP Customer Survey](#).



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 16, 2013

Sent Via E-mail

jeff.curtis@safety-kleen.com

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

**Subject: Safety-Kleen Systems - Sanford , FLD 984 171 165, Permit Number 22198-HO-005
Seminole County
First Request for Additional Information**

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.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. 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,

Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Program & Permitting

MR/mdr

Enclosure

cc via e-mail w/enclosure:

Robert W. Fox, ERM, bob.fox@erm.com

John White, DEP/Orlando, John.White@dep.state.fl.us

Enclosure

Safety-Kleen Systems, Sanford, FLD 984 171 165

Permit Number 22198-HO-005

Safety-Kleen Systems, Sanford Part B renewal dated November 8, 2013

General Comments:

All revisions to the Part B in one location must be made throughout the entire Part B

The electronic copy of your revised Part B must be submitted as a complete copy of your hard copy, in a single .pdf file.

Specific Comments:

Part I

1. Section B. Site Information

B.1 Site Information: The correct latitude and longitude are 28° 48' 23.3" N and 81° 19' 4.29" W. Also provide the method and datum.

2. B.4, "Surface Water Bodies...": The two referenced lakes do not appear to be identified on Figure 2.2-1. Google maps do show a small lake in a residential area to the northwest (Cardinal Cove Circle) and two ponds or stormwater ponds to the northwest just south of Smith Canal Road. The aerial also shows a pond/stormwater pond southwest of Safety-Kleen south of St. John's Parkway. Maps or figures should clearly identify these features.

3. Figure 2.2-5 in the electronic copy was not been scanned completely; however, the paper copy is complete. There are many differences in the electronic copy and the paper copy. As examples, the electronic copy has two pages before Table 6.1-9 related to Fred Burma. They appear to have nothing to do with the application and are not in the paper copy. The electronic copy is missing Figures 8.1-1, 8-2 and 9.2-2 although that may be what their secondary calculation sheets are going to be identified as. Please provide an electronic copy of the application that is a true copy.

Section D. Operating Information:

4. Part I, D.2., page 4, paragraph 2, Line 4, Under "10-Day Transfer Storage Area (FRS) heading: the statement is "...the Branch can store up to 2,000 kilograms of lamps/devices for a period of up to 180 days." Please note that under paragraph 62-737.200(31)(a), F.A.C., a small quantity handler of universal waste lamps or devices can only store up to 2,000 kilograms of lamps or 100 kilograms of mercury containing devices at any one time. References to these limits should be corrected throughout the permit application where they appear.

Part II.A.4.b Preparedness, Prevention, Contingency Plan and Emergency Procedures for Daily Business Operations

5. We recommend the following:
 1. Adding contact information for neighboring facilities in the event an evacuation is necessary.
 2. Maintaining a copy nearby offsite in the event onsite access is not available
6. The title page starts on page 2. If there is a page 1, submit the page.
7. Page 4, paragraph 1: The preparedness and prevention procedures are required by 40 CFR Part 264.30 through .37, and should be referenced in the first sentence.
8. Page 6: The last paragraph states: "...the Branch can store up to 2,000 kilograms of lamps/devices for a period..." Note that paragraph 62-737.200(31)(a), F.A.C. allows "...2,000 kilograms or more of lamps or 100 kilograms or more of devices at any one time."
9. Page 7, paragraph 2, "Note: All waste containers are unloaded within 72 hrs. of arrival at the facility and all waste containers are shipped outbound within 72 hrs. of being loaded for shipment." This "Note" does not appear in Part I, D. Operating Information, 2. Description of Facility Operation. The 72 hour period for unloading waste containers is not acceptable for transfer waste, unless the waste has been logged as having been received at the facility and the 10-day storage period has begun.
10. Page 16: Bullet 2.c. states: "Lids are secured on containers during movement to prevent a spill." We suggest that this be changed so that lids are secured prior to movement.

Part II.B Containers

11. Page 1, paragraph 2: This paragraph refers to a Figure 8.1-1 that is not included. Also, the dimensions appear to be inconsistent. The text has a length of 47' 7" but Figure 8-1 shows a 48' 3" length, and the width is not noted on the figure. Be consistent with the labeling of figures. Need to label the containment calculations as Figure 8-2 to be consistent with the text.
12. Page 3, paragraph 2, Line 6 Container Movement: The statement is made that "Pallets may be shipped up to three high during transportation." The Part B should note that at no time will containers be stored three high within the facility, either in the container storage area or the 10-day transfer area.
13. Page 5, paragraph 1: A 5th bullet should be added to address the requirement of 264.17(b)(5): Where specifically required by other sections of this part, the owner or

operator of a facility that treats, stores or disposes ignitable or reactive waste, or mixes incompatible waste or incompatible wastes and other materials, must take precautions to prevent reactions which through other like means threaten human health or the environment.

Part II.C Tank Systems

14. Page 4, paragraph 1: Is the Orange Park Branch notified for sensor detects at Sanford?

15. Page 5, paragraph 2: The length of the return/fill containment is given as 78' 9" here in the text but is 78' 1" on Figure 9.3-1. Correct the discrepancy here and elsewhere.

16. The containment calculations need to be labeled as Figure 9.2-2 to correspond with the text.

Part II.K Closure

17. Page 3, paragraph 2, line 18 reads "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 the releases from mercury-containing lamps and devices will be conducted at the time of release."

It is unclear what is meant by "special decontamination." However, as stated in the previous sentence, decontamination of the mercury-containing lamps and devices area will occur during closure. Although most spills/releases are required to be reported (and potentially remediated) by the permit, releases less than the Reportable Quantity (RQ) do not need to be reported. It is therefore possible that many small unreported releases could occur throughout the lifetime of the operations, without Department oversight on cleanup activities.

Part II.S Air Emission Standards

18. Page 6, last paragraph: The volume of tank is given as 15,000 gallons and on page 7 it is given as 20,000 gallons.

Appendix B Chemical Analysis Reports, Annual Recharacterization

19. Ensure that this report is included in the final electronic copy of your Part B.

Appendix C Tank Integrity Inspection report

20. Page 3 of 5, Next Inspection: Since the repair has been completed when is the next inspection scheduled?

21. Minor typos and comments:

1. Part I, B.3, Site Information, page 1 of 1, paragraph 2, Line 10: "Used oil" misspelled as "Use oil"
2. Part I, D.2 Operating Information, page 1, paragraph 2, Line 9: "Used oil" misspelled as "Use oil"
3. Part I.D.2 Operating Information, page 1: Paragraph 2, Line 7 references "Five" tanks but identifies the contents of four tanks. We suggest the text be revised to indicate the two used oil tanks.
4. Part I. D.2 Operating Information, page 3, paragraph 4, Line 1, Under "10-Day Transfer Storage Area (FRS) heading: The word "the" is missing from the sentence "The 10-day transfer storage area is located in the northern portion..."
5. Part II.A.1, first paragraph, second sentence: "...cannot be placedu on one map."
6. Part II, Contingency Plan, page 12: Formatting issues on page. Two extra lines between first and second paragraphs and one extra line between third and fourth paragraphs.
7. Part II, Contingency Plan, page 28: Formatting issues on page. One extra lines between items 4. And 5.
8. Part II, Contingency Plan, Table 5.2-1, Page 1 of 2, last line: "Leaks" should not be included in the "Frequency of Inspection" column.
9. Part II. A.4.e Training, page 32, last paragraph: The sentence should probably read "...employees who manage or handle Hazardous Waste at the Branch..."
10. Part 2 C Tank Systems: page 6, Tank System Closure and Contingent Post-Closure Plan, paragraph 1, line 2: "Part II K" should read "Part 2 K"
11. Part 2 C Tank Systems: page 7, paragraph 3, Line 4: "released" should read "releases"
12. WAP, page 15, last line: diaminetetraacetic is misspelled.