

## Russell, Merlin

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**From:** Russell, Merlin  
**Sent:** Friday, February 07, 2014 7:08 AM  
**To:** Curtis, Jeff  
**Cc:** White, John; Bahr, Tim; Tripp, Anthony; Echevarria, Edgar  
**Subject:** FW: "SK Sanford"  
**Attachments:** SK Sanford Response - First Request for Additional Information 2-6-14.pdf

Good Morning Jeff,

Yes to everything. Please get the figure in as quickly as possible. After we review your response, if there are any remaining issues, we'll work those out and then have you submit a final .pdf we can post into OCULUS.

Have a good weekend.

merlin

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**From:** Curtis, Jeff [mailto:Jeff.Curtis@safety-kleen.com]  
**Sent:** Thursday, February 06, 2014 3:05 PM  
**To:** Russell, Merlin  
**Cc:** White, John  
**Subject:** "SK Sanford"

Hello Merlin,

Attached is the response to the first request for additional information letter, dated 12/6/13. It is missing one item, figure, 2.2-1. ERM's CAD drawer just went out on maternity leave so they have a replacement working on that figure and I anticipate it within the next week. In addition, I will provide a complete scanned copy of the application after you guys have reviewed the revisions, if that is ok with you?

Thank you, Jeff

**Jeff Curtis** EHS Manager | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | [jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)

561.738.3026 (o) | 561.523.4719 (c) | 561.731.1696 (f) | [safety-kleen.com](http://safety-kleen.com)

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**MAKE GREEN WORK**

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



February 6, 2014

Via E-mail

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. Sanford; FLD 984 171 165, Operating Permit No. 22198-  
HO-005, Seminole County  
First Notice of Deficiencies Dated December 16, 2013**

Dear Mr. Russell:

Safety-Kleen (SK) has prepared this letter in response to the above referenced letter from the Department dated December 16, 2013. 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:** 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.

*SK Response:* Part I.B.1 has been revised accordingly.

**FDEP Comments #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.

*SK Response:* Figure 2.2-1 has been revised accordingly.

**FDEP Comments #3:** Figure 2.2-5 in the electronic copy was not 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 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.



*SK Response:* Figure 2.2-5 is an 11' x 17" copy and this may be the reason it was not scanned properly. When all revisions are made, and the Department is satisfied with the completeness of the document, a new electronic copy of the entire application will be forwarded.

**FDEP Comments #4:** Section D. Operating Information: 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.

*SK Response:* The above information has been revised accordingly throughout the application.

**FDEP Comments #5:** Part II.A.4.b Preparedness, Prevention, Contingency Plan and Emergency Procedures for Daily Business Operations: 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.

*SK Response:* Safety-Kleen is open to attempting to gather contact information for neighboring facilities in the event an evacuation is necessary. However, this information would not be part of the formal facility contingency plan as we cannot control changes to this contact information. Electronic copies of the plan are available in case onsite access is not available.

**FDEP Comments #6:** The title page starts on page 2. If there is a page 1, submit the page.

*SK Response:* There is no page 1 to the plan. It begins with the title page.

**FDEP Comments #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.

*SK Response:* This reference has been added to the plan.

**FDEP Comments #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."

*SK Response:* The above revision has been made to the document.

**FDEP Comments #9:** Page 7, paragraph 2, "Note: All waste containers are unloaded within 72 hours of arrival at the facility and all waste containers are shipped outbound within 72 hrs. of being loaded for

Mr. Merlin D. Russell Jr.

February 6, 2014

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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.

*SK Response:* The above “Note” has been added to Part I, D. In addition, Safety-Kleen agrees with the Department that 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.

**FDEP Comments #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.

*SK Response:* The above language revision has been made.

**FDEP Comments #11:** Part II.B Containers, 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.

*SK Response:* The above revisions have been made.

**FDEP Comments #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.

*SK Response:* The revision regarding containers not being stored three high within the facility, container storage area or 10-day transfer area, has been made.

**FDEP Comments #13:** Page 5, paragraph 1: A 5<sup>th</sup> 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.

*SK Response:* A 5<sup>th</sup> bullet has been added to reflect the language above.

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**FDEP Comments #14:** Part II.C Tank Systems, Page 4, paragraph 1: Is the Orange Park Branch notified for sensor detects at Sanford?

*SK Response:* This was a typo and has been revised. The Sanford Branch is notified for sensor detects.

**FDEP Comments #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.

*SK Response:* These discrepancies have been corrected.

**FDEP Comments #17:** Part II.K Closure, 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.

*SK Response:* The language regarding "No additional, special decontamination of the mercury-containing lamps and devices storage area being conducted" has been removed from the closure plan. Closure of this area, as well as all other required units of the facility, will be done in accordance with FDEP regulations and guidance at the time of closure.

**FDEP Comments #18:** Part II.S Air Emission Standards, 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.

*SK Response:* The tank is 20,000 gallons and the typo has been revised.

**FDEP Comments #19:** Appendix B Chemical Analysis Reports, Annual Recharacterization: Ensure that this report is included in the final electronic copy of your Part B.

*SK Response:* We will provide the above report in the final electronic copy of the Part B.

**FDEP Comments #20:** Appendix C Tank Integrity Inspection Report, Page 3 of 5, Next Inspection: Since the repair has been completed when is the next inspection scheduled?

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*SK Response:* Safety-Kleen's engineering department has provided the patch repair report to Mott Tank Inspection, Inc. and they have revised page 3 of the tank integrity inspection report to indicate the next inspection will be due 10 years from the September 17, 2013 inspection. A copy of the revised page 3 is provided with this response.

***FDEP Comments #21 Minor typos and comments #1-12.***

*SK Response:* The minor typos and comments listed in the Department's letter have been addressed and revised, and are included with this response.

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: John White, FDEP Central District

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

E-mail address jeff.curtis@safety-kleen.com

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

Address 10210 Highland Manor Drive, Suite 140, Tampa FL 33610  
Street or P.O. Box city state zip

Associated with Environmental Resources Management, Inc.

18. Is the facility located on Tribal 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	22198-HO-005	9/8/09	5/10/14
UO/Filter Transfer	FDEP	FLD984171165	7/3/13	6/30/14
HW Trans	FDEP	FLD984171165	7/1/13	6/30/14
Lamps/Mercury	FDEP	FLD984171165	2/12/13	3/1/14

#### B. Site Information

1. The facility is located in Seminole County.

The nearest community to the facility is Sanford

Latitude 28 48' 23.3" N Longitude 81 19' 4.33" W

Method and datum Google Earth

2. The area of the facility site is 3.2 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.

***Part I***

***D. Operating Information***

***2. DESCRIPTION OF FACILITY OPERATION***

***Description of the Business***

Safety-Kleen Systems, Inc. of Richardson, Texas is an international service oriented company whose customers are primarily engaged in automotive repair and industrial maintenance. Since 1968, Safety-Kleen has been offering a leasing service for petroleum-based hydrocarbon solvents and small parts washing equipment.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the Branch to the customer, from the customer to the Branch, from the Branch to the recycle facility, and then from the recycle center back to the Branch for redistribution to customers. This closed loop supplies Safety-Kleen with most of its solvent requirements (nearly two-thirds of the clean solvent delivered to the field has been previously used by its customers). Ownership of the solvent remains with Safety-Kleen. Solvent containers (product and waste) are transported in specially-equipped, enclosed route trucks. Five aboveground tanks are maintained at the Safety-Kleen Sanford facility. These tanks are used for storage of one-waste solvent, and one-product 150 Premium Solvent, two-Used Oil, and one-Used Antifreeze.

The Safety-Kleen parts washing equipment, together with the solvents are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local Branches (sales branches) located in 45 states. The Branches warehouse the products and equipment required to service the customers in their sales area. On a contractual basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's solvents.



Safety-Kleen provides a dry cleaning waste reclamation service where containers of dry cleaning wastes are collected and stored temporarily at the Branch before shipment to the TSDF centers for reclamation and processing. All dry cleaning wastes remain in their original containers while at the Sanford facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and stored temporarily at the Branch before shipment to the TSDF centers for reclamation and processing. Paint wastes are managed as permitted wastes. All paint wastes remain in their original containers while at the Sanford facility.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch. Under this program, other types of waste are collected by the Branch and sent out to the TSDF centers. The FRS wastes are managed as transfer wastes. Examples of the types of wastes that may be received from FRS customers include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naptha, etc.
- Lubricating oils, hydraulic oils, synthetic oils, and machine oils.
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
- Photographic and x-ray related wastes.
- Paint and lacquer thinners.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

**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.**

***10-Day Transfer Storage Area (FRS)***

The 10-day transfer storage area is located in the northern portion of the main warehouse, and the northwestern return/fill bay. Signage clearly marks these areas. All hazardous waste containers stored in the 10-day transfer area are manifested and in transit to other permitted facilities. Safety-Kleen Sanford is not the designated facility for wastes stored in the 10-day transfer area.

In 1990 Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. This service is offered in conjunction with Safety-Kleen's used oil collection service. All used antifreeze collected and managed by Safety-Kleen within Florida is recycled. The trucks used to collect and transport waste ethylene glycol are the same trucks used for collection and transport of used oil. The trucks have more than one compartment so the antifreeze is picked up and stored in a separate compartment until off-load at the branch. At the customer locations, Safety-Kleen pumps used ethylene glycol and transports the material to the Branch for off-loading into a tank for storage. The ethylene glycol is held until shipment to be reprocessed into a pure product. This procedure is in accordance with FDEP's *Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities*, dated May 22, 2012. In addition, Safety-Kleen sells its' own Kameleon private label antifreeze in 55-gallons containers. Customers will then place used antifreeze in these containers to be shipped back to the branch. This material is shipped to SK distribution centers, and then shipped to 3<sup>rd</sup> party recyclers.

In 1996, the Branch became registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the regulations of Florida Administrative Code (FAC) 62-737.400. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can store up to 2,000 Kilograms of lamps/devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at

the Branch as non-hazardous transfer wastes. The boxes are stored at the Branch in a designated area and are labeled in accordance with FAC 62-737.400(5)(b), and partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Safety-Kleen handles all types of batteries with the exception of lithium batteries. All applicable batteries, per 40 CFR Part 273.2 & 273.9, are managed in accordance with the Standards For Universal Waste Management found in 40 CFR Part 273. Batteries not meeting these standards may be managed as 10-day transfer hazardous waste.

Containers of hazardous waste are picked up at customer locations and transported back to the Branch in route trucks. Each route truck is equipped with a hand-truck and electric lift gate for movement of containers. Upon arrival at the Branch, containers are placed on pallets and moved by way of forklift to the appropriate areas. Containers of used parts washer solvent are unloaded at the return/fill area and are dumped by hand into the wet dumpster for transfer via piping to the hazardous waste used solvent tank. Forklifts are used for loading containerized hazardous waste containers onto trucks for transport to Safety-Kleen TSDF's.

Safety-Kleen constructed the Sanford Branch with the intent that it will be a long-term facility for the distribution of Safety-Kleen products. No on-site disposal activity occurs at the facility and, hence no disposal capacity will be exhausted that will necessitate closure of the facility. Based on current business and facility conditions, the Sanford facility is expected to remain in operation at least until the year 2035.

***PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY  
PROCEDURES FOR DAILY BUSINESS OPERATIONS***

***GENERAL INFORMATION***

***Purpose***

The preparedness, prevention, and contingency plan and emergency procedures are designed to comply with 40 CFR Part 264.30-37. In addition, the procedures in the plan ensure that Safety-Kleen reduces the possibility of emergency situations and, should they occur, respond in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

The provisions of the plan are to be carried out immediately if there is a fire, explosion, or release of hazardous materials that could threaten human health or the environment. All responses must conform to the procedures contained in this plan.

***General Description of Activities***

The business activities conducted at the Sanford Branch relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from, and the used solvents returned to, the Branch, where separate storage tanks are utilized for the storage of clean and used parts washer solvent. One 20,000-gallon fresh parts washer solvent storage tank currently is utilized at the facility. In addition, a 20,000-gallon tank is used to contain hazardous waste solvent, two 20,000-gallon tanks are used for storage of Used Oil, and a 12,000-gallon tank (double-walled) is used for storage of used antifreeze. Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, parts washer solvent, paint waste, Fluid Recovery Services (FRS) wastes, and dry cleaning wastes. Over-pack containers are used for the management of containers whose integrity has been compromised.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are stored at the permitted container storage area. Paint wastes are received at the Branch on manifests which are terminated at that point. These wastes are then re-manifested and shipped to a permitted Safety-Kleen TSDF, and the regenerated solvent may be distributed to Safety-Kleen customers for use as a product.

The FRS wastes are packaged in polyethylene or steel containers which are not opened until they reach a permitted Safety-Kleen TSDF. The FRS wastes are transfer wastes and may be stored onsite for up to 10 days. The FRS wastes may also undergo branch-to-branch or truck-to-truck transfer. This transfer will occur at the return/fill station inside secondary containment.

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. Material Safety Data Sheets (MSDSs) for each hazardous material are available at the Branch and on demand by fax through a company-owned MSDS information service. This service provides 24-hour phone or fax access to an extensive MSDS database.

The Branch is registered in Florida as a transporter and storage facility for mercury-containing lamps and devices destined for recycling. This registration includes a commitment to comply with the requirements of Florida Administrative Code (FAC) 62-737.400, including all training requirements. Route trucks handling these materials are equipped with mercury clean up kits. As a registered small quantity handler of universal waste lamps/mercury devices, the Branch can store up to 2,000 kilograms of lamps/devices at any one time. Safety-Kleen provides customers with empty four-foot and eight-foot boxes which hold up to 39 lamps. Boxes containing lamps are picked up from customers and are handled at the Branch as nonhazardous transfer wastes. The boxes are stored at the Branch in a designated area within the transfer waste storage area. This storage area is labeled in accordance with FAC 62-737.400(5)(b), and is partially isolated from other transfer wastes to avoid potential for accidental breakage. The boxes are periodically shipped to a permitted mercury recovery or reclamation facility. Prior to shipment out of the Branch, the boxes are placed on pallets and shrink-wrapped with plastic. Figures 5.1-1 and 5.1-2 show the basic site and floor plans and the locations of waste management facilities and facility storage.

2. Delivery truck container transfers.
  - a. Individual delivery containers hold from 5 to 55 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
  - b. Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent containers off the truck and into the customer's shop and returning the dirty solvent containers to the truck.
  - c. Lids are secured on containers prior to movement to prevent a spill.
  - d. Each truck contains a complete spill kit, shovel, and a quantity of sorbent material to contain minor spills.
  - e. The cargo must be secured in the route vehicle before transit.

### ***Spills Inside Buildings***

In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. Following the instructions of the Material Safety Data Sheet (MSDS), a worker would enter the area wearing rubber gloves, boots, and mop up the liquid and return it to dirty storage. Spills inside the building will be contained by the existing secondary containment structures, or by using available absorbent material and booms. Proper characterization, treatment, and disposal of the decontamination water will be done on a case by case basis depending on the material released. All material will be disposed of per federal, state, and local regulations. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

### ***Spills on Concrete Pads***

Concrete pads in loading and unloading areas are, in most cases, equipped with secondary containment. Under most spill conditions, product can be totally contained on the concrete surface and in the containment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and handled in the same manner as the material spilled.

***Part II***

***B. CONTAINERS***

The hazardous waste container storage area is depicted in Figure 8-1. The warehouse is used for storage of virgin materials, permitted hazardous wastes, and transfer wastes. The location of the permitted storage area is shown in Figure 8-1.

***CONTAINMENT SYSTEM***

The container storage area (47' 8" x 34' 1") shown in Figure 8-1 occupies the northwestern portion of the warehouse (47' 8" x 78' 9"). This warehouse area has concrete floors, and a central collection trench to form a spill containment system within the area.

The containment volume is composed of the sloped concrete floor and the collection trenches. The containment calculations are illustrated in Figure 8-2. The total containment volume was measured at 2,077 gallons. Therefore, the maximum storage capacity is 20,770 gallons. The amount of waste that is permitted to be stored in the container storage area is 6,912 gallons. Waste allowed for storage is immersion cleaner, dry cleaning solvent, parts washer solvent dumpster mud, tank bottoms, paint related wastes and oil filters. The types and number of each type of container may vary; however, the storage capacity will not be exceeded. Virgin materials (product) is stored in the southern portion of the warehouse building.

***FRS Waste and Transfer Wastes***

Transfer wastes may be stored in the southern portion of the permitted container storage area, and northwestern portion of the Return/Fill area (Figure 8-1). Since FRS wastes are transfer wastes only, they are not required to have containment, although these two areas are provided with secondary containment.

***Container Movement***

In the container storage area, containers are handled with a hand-truck or forklift that is free of sharp points. Every time a drum is moved, a chance exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, containers are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe container. Each route truck is equipped with a lift-gate or an electric hoist. These devices are used in the loading/unloading operation to minimize chances for spillage and/or employee injury. With the exception of parts washer solvent, drummed wastes may be loaded/unloaded at the dock on the west side of the building. The parts washer solvent is loaded/unloaded at the return/fill station.

All containers are transported, moved, and stored carefully in an upright position. Containers are palletized whenever possible to facilitate shipping and storage. Pallets may be stacked up to seven feet, or two high (whichever is higher), while in storage. This will prevent the containers from contacting standing liquid while they are in storage. At no time will containers be stored three high within the facility, either in the container storage area or the 10-day transfer area. Pallets may be shipped up to three high during transportation. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling.

***INCOMPATIBLE, IGNITABLE, AND REACTIVE WASTE MANAGEMENT***

All materials are managed in accordance with the local fire protection code and fire department recommendations. All containerized ignitable wastes are stored at least 50 feet from the property line.

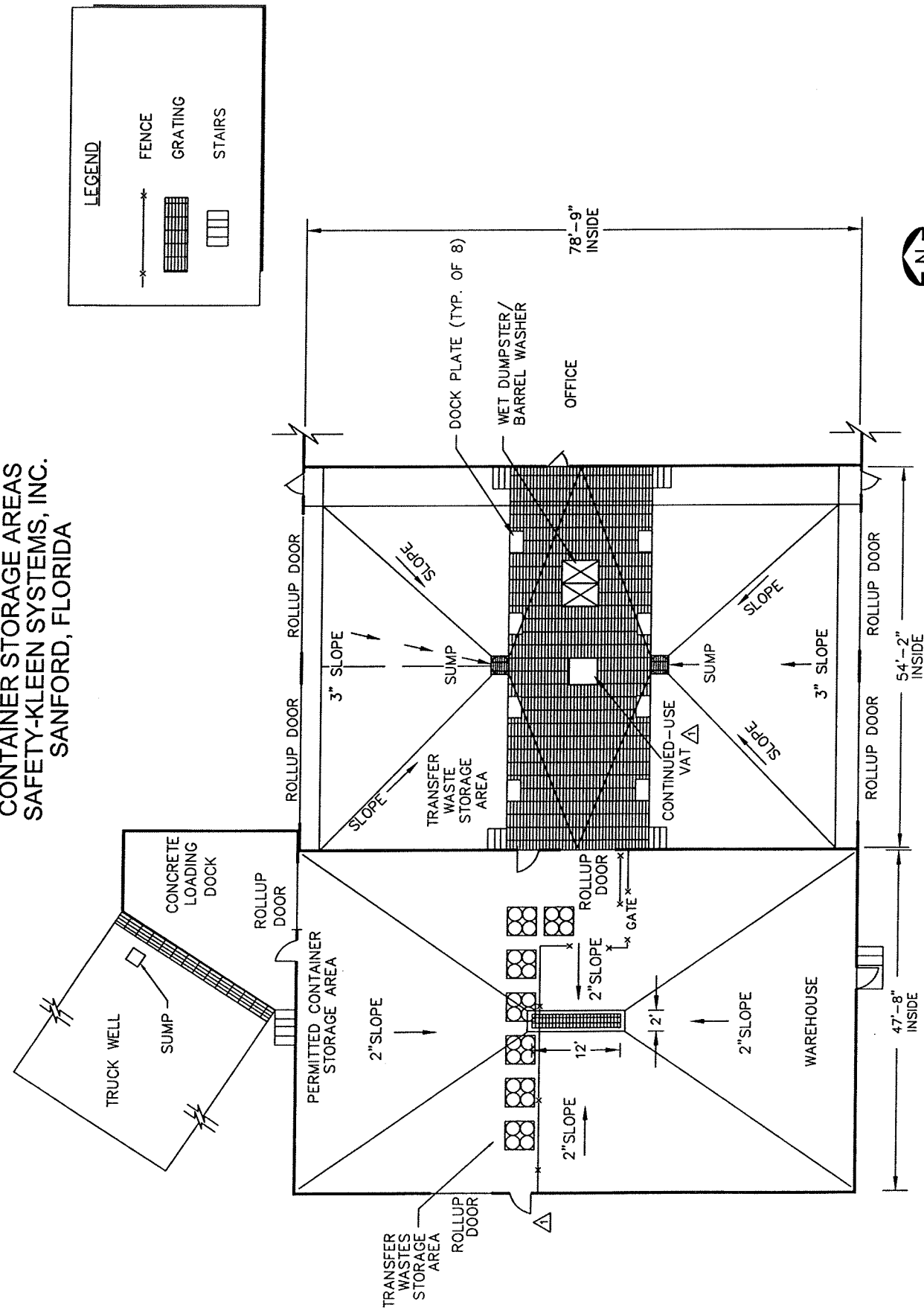


2. *Ignitable wastes are handled so that they do not:*

- become subject to extreme heat or pressure, fire, explosion, or a violent reaction – The parts washer solvent waste is stored in a tank or in containers, none of which 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.
- 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 Hg) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts, or gases will not form in quantities sufficient to threaten human health since strong oxidizers are carefully segregated at this facility and the solvent vaporization will be minimal under normal working conditions.
- produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion – See above and below.
- damage the structural integrity of the Safety-Kleen facility – The solvents stored at this facility will not cause deterioration of the tank, containers, or other structural components of the facility.
- Per 40 CFR 264.17(b)(5), where specifically required by other sections of this part, the owner or operator (SK) 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.

3. *Adequate aisle space is maintained* to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
4. *“NO SMOKING” signs are posted* in areas where solvents are handled or stored.
5. *Fire extinguishers are checked* weekly by Branch personnel.

FIGURE 8-1  
CONTAINER STORAGE AREAS  
SAFETY-KLEEN SYSTEMS, INC.  
SANFORD, FLORIDA



**LEGEND**

—x—x—	FENCE
▢▢▢	GRATING
▢▢▢	STAIRS

**N**

0 20  
APPROXIMATE SCALE  
(FEET)



Figure 8-2



Environmental Resources Management

Project SAFETY-KLEEN SANFORD

W.O. No. 1311320.22 Sheet 1 of 1

Subject Container Storage Area

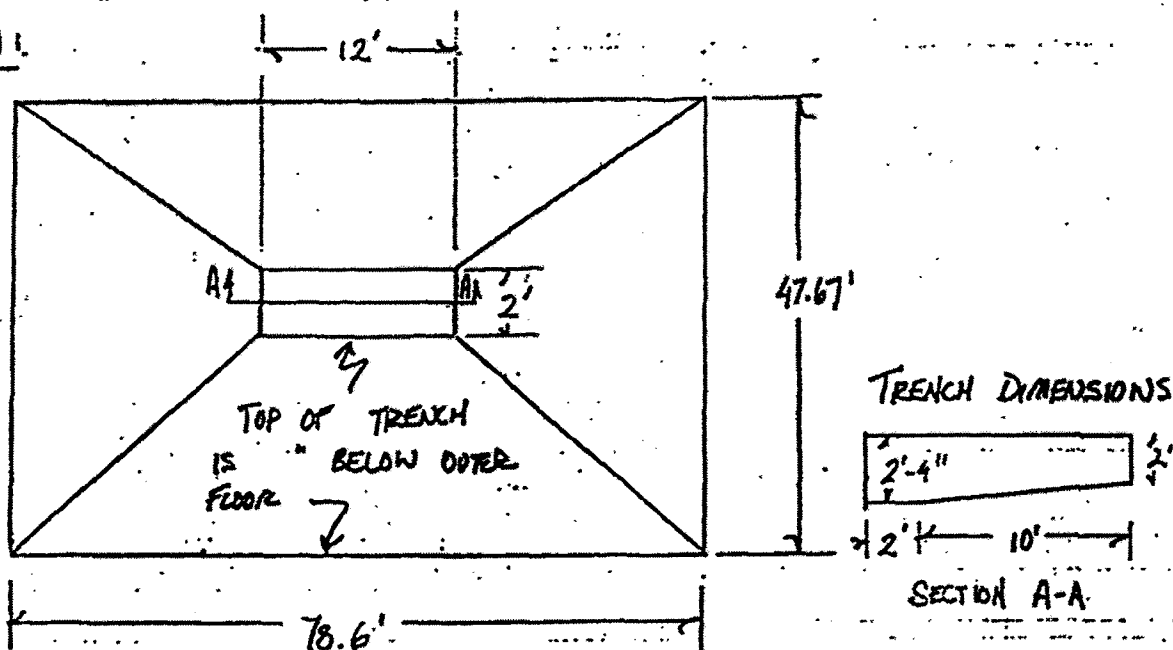
By V.H. Date 1/8/93

AREA VOLUME CALCULATIONS

Chkd by Date

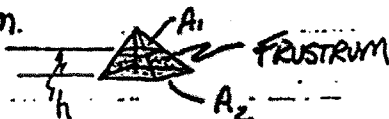
DETERMINE: CONTAINMENT VOLUME OF WAREHOUSE AREA (DRUM STORAGE)

GIVEN:



NOTE: FLOOR PLAN DIMENSIONS WERE MEASURED DURING THE ERM SITE VISIT PERFORMED 1/6/93. THE 2' SLOPE COULD NOT BE MEASURED, BUT WAS ASSUMED CORRECT FOR PURPOSES OF THESE CALCULATIONS.

ASSUMPTIONS: ASSUME FLOOR CONFIGURATION IS SIMILAR TO THE FRUSTUM OF A PYRAMID, AND APPLY THE VOLUME FORMULA FOR A FRUSTUM.



FLOOR VOLUME:

$$V = \frac{h}{3} (A_1 + A_2 + \sqrt{A_1 A_2})$$

WHERE  $h = 0.08 \text{ or } 0.17'$   
 $A_1 = 2' \times 12' = 24 \text{ ft}^2$   
 $A_2 = 78.7' \times 46.3' = 3,644 \text{ ft}^2$

$$V = \frac{0.17}{3} (24 + 3,644 + \sqrt{24 \times 3,644})$$

$$V = 224.6 \text{ ft}^3 = 1,680 \text{ GALLONS}$$

TRENCH VOLUME:

$$(2 \times 2 \times 2.33) + ((2.33 + 2) \frac{1}{2} \times 10 \times 2) = 53 \text{ ft}^3 = 396 \text{ GALLONS}$$

$$\text{Total Volume} = 224.6 \text{ ft}^3 + 53 \text{ ft}^3 = 277.6 \text{ ft}^3 = 2,077 \text{ GALLONS}$$

the base of the secondary containment structure. The sensor detects the presence or absence of liquids. It will be monitored 24-hours a day, seven days a week, by a 3<sup>rd</sup> party (Protection One). If the sensor detects liquid it will immediately send a warning notice to Protection One, who will then immediately call the emergency coordinator for the Sanford branch. This system will allow continuous leak detection monitoring when the facility is not occupied. Information on this system can be found at the end of Part II.C. We anticipate the system to be installed by December 31, 2013.

***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***

The three tanks in the above ground storage tank farm are underlain by a 56'7" x 38'8" concrete slab, surrounded by a 3' high concrete wall. The wall height in the containment varies with the floor slope and directs flow toward an approximately 35-gallon blind sump. No surface run-on or precipitation will contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. A metal canopy installed over the tank farm minimizes the chance of precipitation accumulating inside the containment area. The layout of the tank farm is shown in Figure 9.2-1. Tank farm containment calculations are shown in Figure 9.2-2. Containment volume was estimated to be 28,092 gallons. This volume represents greater than 100 percent of the capacity of the largest tank within the containment area.

The containment areas have been coated with Sikagard® 62 or equivalent. Inspections of the sealant in the containment areas will be conducted as described in Tank System Inspections. If the sealant is found to be worn or deteriorated such that repairs are warranted, the sealant will be repaired in accordance with manufacturers' specifications.

#### ***Return/Fill Containment***

The return/fill station is a 54' 2" x 78' 9" structure (Figure 9.3-1) located between the office building and warehouse. It contains two wet dumpsters which handle the flow of waste solvent to the hazardous waste storage tank. These dumpsters are not intended for storage but can hold a maximum of 216 gallons (108 gallons per dumpster).

The area is designed such that the route trucks can be backed into the containment area. The roof extends over the truck unloading area so that no precipitation can get into the return/fill station containment area. The containment for the return/fill station is provided by two blind sumps, with a total capacity of approximately 69-gallons. The floor in the return/fill station is sloped to direct flow toward the two sumps. The total containment was estimated to be 5,011-gallons, as shown in Figure 9.2-2.

#### ***TANK SYSTEM INSPECTIONS***

The purpose of the inspection plan is to establish a procedure and schedule for the systematic monitoring and inspection of hazardous waste management and other material 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.

### Tank Farm:

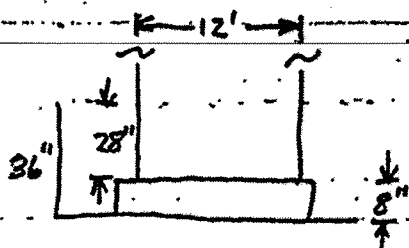
$$\begin{aligned}\text{Enclosure: } V &= 56'7'' \times 38'8'' \times 3' \\ &= (56.58)(38.67)(3) \\ &= 6563.8 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 49,097.6 \text{ gal}\end{aligned}$$

$$\text{Sump: } V = \pi r^2 h = (3.14)(.92)(1.625) = 4.7 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 35 \text{ gal}$$

### Vertical Tank Displacement:

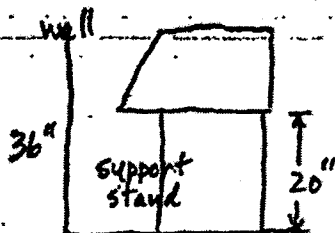
$$\begin{aligned}\text{Individual support pads: } V &= 14' \times 14' \times 8'' \\ &= (14)(14)(.67) = 131.3 \text{ ft}^3 \\ (131.3 \text{ ft}^3)(6 \text{ pads}) &= 788 \text{ ft}^3 \times \frac{7.48 \text{ gal}}{\text{ft}^3} \\ &= 5894 \text{ gal}\end{aligned}$$

$$\text{Tank volume below wall height: } = 5894 \text{ gal}$$



$$\begin{aligned}V &= \pi r^2 h \\ &= (3.14)(6')^2(28'') (3 \text{ tanks}) \\ &= (3.14)(36)(2.33)(3) \\ &= 791.3 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 5919 \text{ gal}\end{aligned}$$

### Tank Filler Enclosure



$$\begin{aligned}V &= 48'' \times 36'' \times (36'' - 20'') \\ &= (4')(3')(1.33') \\ &= 16 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 119.7 \text{ gal}\end{aligned}$$

Rainfall from 25 year 24 hour event assumes tall roof structure is too high to negate rainfall entering into the containment structure

$$\begin{aligned}V &= 56'7'' \times 38'8'' \times 11 \text{ inches of rainfall} \\ &= (56.58)(38.67)(.916) = 2005.6 \text{ ft}^3 \times \frac{7.48 \text{ gal}}{\text{ft}^3} = 15,002 \text{ gal}\end{aligned}$$

$$\begin{aligned}\text{TOTAL CAPACITY} &= 49,097.6 \text{ gal} \quad \text{enclosure} \\ &+ 35 \text{ gal} \quad \text{sump} \\ &- 5919 \\ &\quad 119.7 \\ &- 15,002 \quad \text{rainfall} \\ \hline &28,092 \text{ gal} > \text{largest tank (20K)} \quad \text{CAPACITY OK}\end{aligned}$$

Project SK Sanford  
 Subject Containment Calculations

 W.O. No. 1311320.22 Sheet 1 of 1  
 By VH Date 1/8/93  
 Chkd by \_\_\_\_\_ Date \_\_\_\_\_

Return/Fill Shelter: volume approximated due to inability to measure slope from a known reference point

$$\begin{aligned}
 \text{Gross volume} &= L \times W \times H = 54'2'' \times (29'4\frac{1}{2}'' + 20' + 29'4\frac{1}{2}'' ) \times 3'' \\
 &= 54'2'' \times 78'9'' \times 3'' \\
 &= (54.17') (78.75') (.25') \\
 &= 1066.5 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 7977 \text{ gallons}
 \end{aligned}$$

$$\begin{aligned}
 \text{Volume of sloped area: } V &= \frac{1}{2} b h d = (0.5)(27'1'')(29'4\frac{1}{2}'')(1.5'' \text{ avg depth}) \\
 &= (0.5)(27.08')(29.375')(.125') \\
 &= 49.7 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 372 \text{ gal} \\
 372 \text{ gal} \times 8 \text{ sloped areas} &= 2975 \text{ gal}
 \end{aligned}$$

$$\begin{aligned}
 \text{Sump volumes: } V &= \pi r^2 d = (3.14)(.96')^2 (1.6') = 4.63 \text{ ft}^3 \times \frac{7.48 \text{ gal}}{\text{ft}^3} \\
 &= 34.6 \text{ gal} \times 2 \text{ sumps} \\
 &= 69.2 \text{ gallons}
 \end{aligned}$$

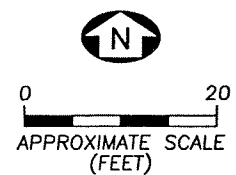
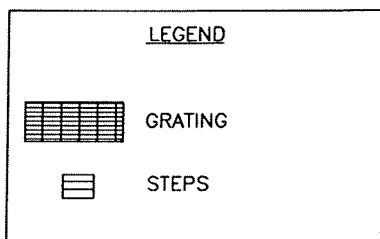
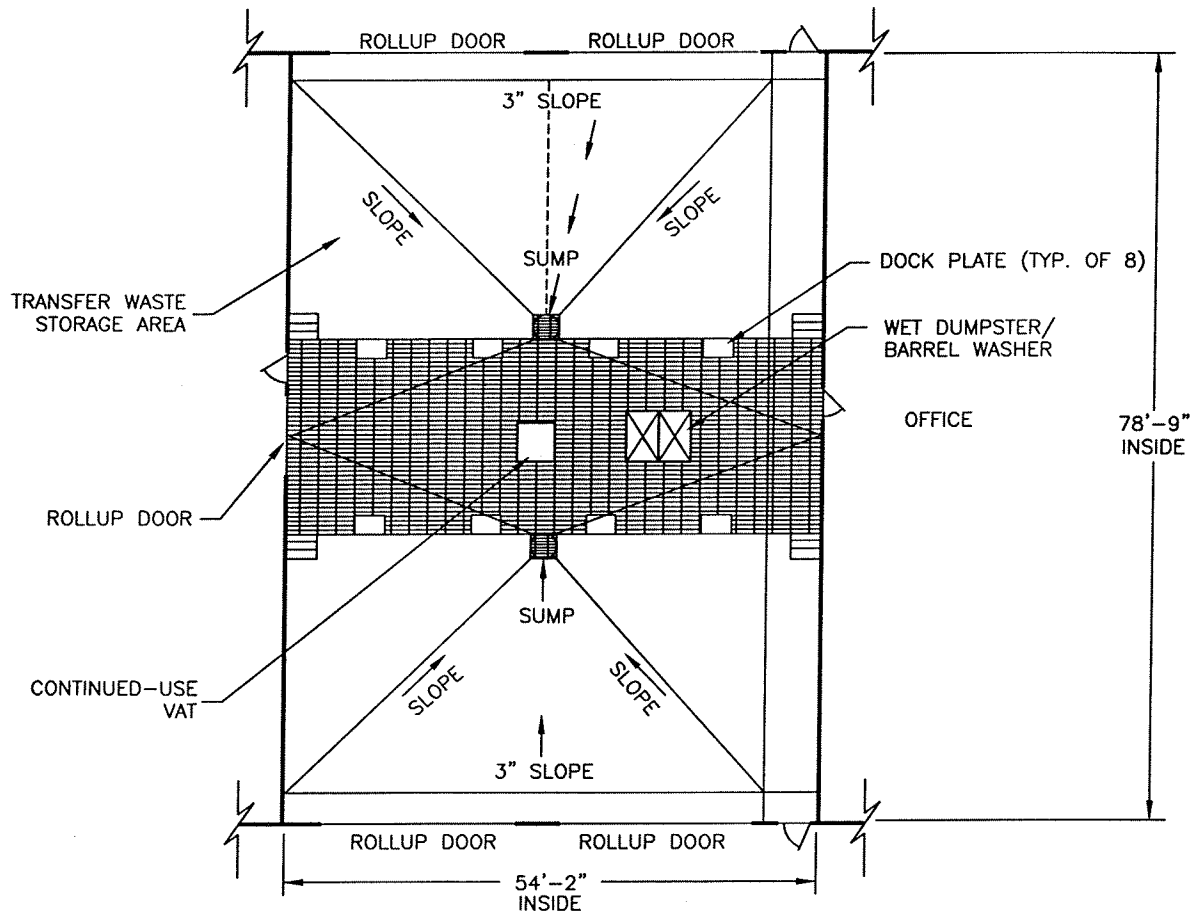
$$\begin{aligned}
 \text{Barrel Washer Volumes: } V &= L \times W \times h = 5' \times 3' \times 3'' \\
 &= (5)(3)(.25) = 3.75 \text{ ft}^3 \\
 3.75 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) &= 28 \text{ gal} \times 2 \\
 &= 56 \text{ gal}
 \end{aligned}$$

$$\begin{aligned}
 \text{Support Columns: } V &= 16'' \times 16'' \times 3'' \\
 &= (1.33)(1.33)(.25) = .44 \text{ ft}^3 \left( \frac{7.48 \text{ gal}}{\text{ft}^3} \right) = 3.3 \text{ gal}
 \end{aligned}$$

$$\begin{aligned}
 \text{Total Capacity: } & 7977 \\
 & - 2975 \\
 & + 69.2 \\
 & = 56.3 \\
 & \hline
 & 5011.9 \text{ gallons}
 \end{aligned}$$

Actual measured volume was 3,745 gallons which indicates the floor slope is less than the 3 inches indicated. The slope of the floor is between 2 and 3 inches.

FIGURE 9.3-1  
RETURN/FILL SHELTER  
SAFETY-KLEEN SYSTEMS, INC.  
SANFORD, FLORIDA



ERM.



## ***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 petroleum constituents, the eight RCRA metals and nickel, and for volatile and semi-volatile organics by EPA methods 8015, 8260, and 8270. The area will be decontaminated to meet FDEP's guidance at the time of closure. The pans, grating, and floor beneath the pans in the paint waste shelter will be cleaned by appropriate means to remove visible contamination. Safety-Kleen intends to recycle the metal components (e.g., pans and grating) in accordance with 40 CFR 261.6(a)(3)(ii) or to reuse them at another Safety-Kleen facility. Accordingly, decontamination of these components is required only to the extent necessary for safe demolition, storage, and transportation of the scrap. 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.

***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 Sanford 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 Sanford 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.

***Supart CC Tank Standards (40 CFR 265.1084)***

The Safety-Kleen Sanford facility manages hazardous wastes in a tank system that consists of one 20,000-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.

**COMPLIANCE DEFICIENCIES**

There was an area of clustered pitting on the interior tank bottom located beneath the automatic tank gauge float of up to 0.090 inch in depth.

**COMPLIANCE RECOMMENDATIONS**

Repair the area of pitting marked for repair on the floor.

**RESULTS**

It is the professional opinion of this inspector that the area of pitting on the floor should be repaired before returning the tank to service.

**NEXT INSPECTION**

The next inspection should be performed within 10 years from the date of this inspection.

*Part I*

*B. Site Information*

**3. FACILITY LAYOUT AND TRAFFIC PATTERNS**

The facility layout is shown in Figure 2.1-1. The non-building areas of the facility are paved with asphalt, or concrete, as noted on the site plan. Site photographs are provided in Appendix A.

Site traffic patterns are illustrated in Figure 2.1-2. The majority of the vehicular traffic and loading/unloading operation occurs at and near the return/fill area (Area A), which is paved with concrete. Approximately once per week a tractor trailer delivers containerized product and removes containerized waste for transfer to a Safety-Kleen TSDF. This truck backs up to the concrete dock, located on the north-western side of the facility in Area B, to load and unload containers. Areas A & D are used for the loading/unloading of transfer wastes, and containerized permitted wastes from local vans and trucks. The trucks dispatched from the recycle center to deliver parts washer solvent and pick up used parts washer solvent will perform these activities at the above-ground tank truck loading area (Area C) approximately once per week. Used oil loading/unloading will also take place in Area C.

U.S. 46, is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that travel the routes daily between the service center and Safety-Kleen customers use the two-lane road within the industrial park (Central Park Drive). Traffic from this facility will have a minor impact on local traffic conditions.

***Part II***

***A. General***

***1. SITE TOPPOGRAPHY AND SURROUNDING LAND USE***

Figure 2.2-1 is a USGS topographic map showing the facility per 40 CFR Part 270.14(b)(19). Due to the small size of the site, all of the information requested in FDEP's application form cannot be placed on one map. Therefore, additional maps are provided here to present the additional information requested in the application form. Specific information requested in the permit application is provided below.

***100-Year Floodplain Area***

Based on information available from the Federal Emergency Management Agency (Figure 2.2-2), the facility does not lie within the 100-year flood plain. This site is located in Zone C, which is an area of minimal flooding.

***Surface Water Bodies Within One-Quarter Mile of the Facility Property Boundary (e.g., Intermittent Streams and Springs)***

Surface water bodies located within one-quarter mile of the facility property boundary include Smith Canal, which runs along the western and southern boundaries of the site, as shown in Figure 2.2-1. There are two lakes, one to the northwest, and the other to the southwest of the site.

***Surrounding Land Uses***

Surrounding land uses are shown in Figure 2.2-3.

***Legal Boundaries of the Facility***

Figure 2.2-4 shows the property boundaries

- If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency response agency shall be summoned immediately and an evacuation order requested.
- In case of a release outside of the containment area that is deemed immediately uncontrollable or unrecoverable, the local emergency response agency and/or specialty cleanup contractor shall be called in.
- After termination of a fire or explosion or containment and preliminary cleanup of a spill, evaluate whether residues in the form of gas or liquid have become airborne, seeped into ground water, and/or flowed into surface water bodies.
- Expert assistance should be requested to determine whether the escaped materials are potentially harmful and whether the receiving medium ultimately will be a populated area, public water supply source, a private well, or an environmentally sensitive area.
- Additional steps shall then be taken to mitigate the potential impact on the environment and human health, in accordance with expert recommendations.

If the emergency coordinator determines that the facility has had a release, fire, or explosion or other emergency that could threaten human health, or the environment outside the facility, the coordinator must report those findings, as follows:

4. Flooding - The waste management facility elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
5. Storms or Cold Weather - The solvent return/fill station, tank storage, and the container storage areas are roofed to eliminate the possibility of rain entering the waste management areas. Neither snow, cold weather, nor stormwater is expected to affect the facility.
6. Hurricanes – Safety-Kleen will adhere to the following procedures in the event of an approaching hurricane:

**Hurricane Watch**

- Compile list of employees with telephone numbers. Give each a call-in number for the branch (Branch Manager cell phone or branch number) in the event operations are interrupted.
- Prepare battery-operated radio (if the facility has one) and other equipment in the case of power outage.
- Complete cleanup of facility property – all empty drums, containers, trash containers, chairs, spill kits, etc. should be brought inside the facility structure.
- Facility services should be restricted to local routes (no more than 30-45 minutes from the facility) in case weather conditions deteriorate.
- Ensure any areas which may be exposed to rainwater are clean and secure filling nozzles.
- Route trucks should be re-fueled prior to the storm, emptied of all wastes and product, secure lift gates and side compartments.
- Ensure all bulk collection trucks have off-loaded into the facility storage tank or BIDS terminal.
- Move trucks inside building as possible and park the remaining trucks as close to the building as possible (preferably at the bay doors).
- Secure computers, monitors, etc. and wrap in plastic with tape.

**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



### ***PERSONNEL TRAINING***

This section of the permit application describes Safety-Kleen's training program. All position descriptions referenced may not be present at this facility. Training plan outlines, job descriptions, training content, frequency and techniques are described as well as the implementation of the training program. The information presented in this section is a representative example of employee training at Safety-Kleen. Variations in individual training may occur.

The purpose of Safety-Kleen's training program is to familiarize employees with environmental regulations, records, and emergency procedures so they will perform their activities in the safest and most efficient manner possible.

### ***DESCRIPTION OF TRAINING PROGRAM***

Each employee is trained to operate and maintain the service center safely, and to understand hazards unique to job assignments. New managers must complete a formal introductory training program before starting their jobs, with annual review and update thereafter. New Sales and Service Representatives and all other hazardous waste employees must undergo a combination of classroom and on-the-job training prior to working with hazardous waste. Personnel involved in direct handling of hazardous waste do not work unsupervised until they have completed the entire initial hazardous waste training course.

### ***Outline of Training Program***

An outline of the training program given initially to employees who manage or handle Hazardous Waste at the Branch is presented in Table 6.1-1.

- 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 coating, 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.

#### ***TANK SYSTEM CLOSURE AND CONTINGENT POST-CLOSURE PLAN***

The tank system closure plan is provided as part of the overall closure plan for the facility in Part 2 K. As discussed below, a contingent post-closure plan for the tanks is not required.

#### ***TANK SYSTEM CONTINGENT POST-CLOSURE PLAN***

The tank system at the Sanford facility meets the secondary containment requirements of 40 CFR 264.193, and is, therefore, not required to have a contingent post-closure plan under 40 CFR 264.197(c). In addition, Safety-Kleen intends to remove or decontaminate

all tank system components, associated containment systems, and contaminated soils (if any) at the time of closure. However, should future conditions indicate that all contaminated soils and tank system components cannot practicably be decontaminated or removed, then a plan to perform post-closure care in accordance with the post-closure care requirements that apply to landfill (40 CFR 264.310) will be prepared for implementation upon FDEP approval.

***RESPONSE TO LEAKS AND DISPOSITION OF UNFIT-FOR-USE TANK SYSTEMS***

In the event that a leak or spill were to occur from a tank system or secondary containment system, the actions identified herein will be undertaken.

***Immediate Response***

All waste flow to the tank system in question will be ceased immediately. An inspection will be undertaken to identify the cause of the release. Waste flow to the tank system will not resume until the tank system has been inspected, repaired, and declared fit for use. In order to prevent further releases, or to allow inspection and a repair of the system, it may be necessary to remove the waste from the tank system. This waste removal will occur within 24 hours after detection of the leak, or at the earliest practicable time.

All material released to the secondary containment area will be removed within 24 hours, or in as timely a manner as possible, to prevent harm to human health and the environment. Every reasonable effort will be made to prevent migration of the release to soils or surface water. If necessary, visible contamination of surface water and soil will be removed and properly disposed of.

***Notifications***

Spills less than, or equal to one pound are exempt from reporting requirements per 40 CFR Part 264.196(d)(2). All other releases require notification as described in the Contingency Plan.

of clean solvent and the spent solvent starts with 2.5 gallons of clean solvent. As the machine is used to spray guns, the fresh solvent is pumped from a tube in the fresh solvent container through the machine and into the spent solvent container. This cleaning/degreasing process will continue until the volume of solvent in the fresh container reaches the 2.5-gallon mark. A tube in the fresh solvent extends half way down the container (i.e., to the 2.5-gallon mark). Any solvent above 2.5 gallons in the fresh solvent container at the time of servicing will be pumped through the machine into the spent solvent container by the Safety-Kleen service representative. Therefore, when the machine is serviced, the spent solvent container will always contain 5 gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two containers or there is an overfill from the spent solvent container, the waste may be sampled for contamination in accordance with the procedures described above, or the waste will be rejected.

#### *Paint Waste*

The significant criterion for the inspection of paint waste is consistency. The waste should contain no more than 30 percent solids. The material should be a “free flowing” liquid, but should not contain a significant amount of water.

#### *Mercury-Containing Lamps and Devices*

As part of its protocol for handling mercury-containing lamps and devices destined for recycling, the Branch provides customers with 4-foot and 8-foot boxes which hold up to 39 lamps. Boxes are inspected prior to transport from the customer to the Branch. Boxes containing broken lamps are accepted only if the box is completely sealed and then sealed again with plastic shrink wrap. Surfaces that have come into contact with pieces from a broken lamp will be decontaminated using HgX (sodium thiosulfate and ethylene diaminetetraacetic acid), in accordance with manufacturer’s specifications.