## ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 2858 N. W. 79th Avenue • Miami, Florida 33122 • (305) 591-3076

Reply To: Tampa Office

November 8, 1990

Project No. 13112.21, Task 1

Mr. Knox McKee
Florida Department of
Environmental Regulation
1900 South Congress Avenue, Suite A
West Palm Beach, FL 33406

RECEIVED
NOV 1 3 1990
Dept. of Environmental Reg.
West Palm Beach

RE: Safety-Kleen Corp. Medley, Florida Construction Permit Application

Dear Knox:

On behalf of Safety-Kleen Corp., Environmental Resources Management-South, Inc. (ERM) is pleased to submit six copies of revised portions of the above-referenced Construction Permit Application. ERM has reviewed the entire application and am submitting six copies of the Engineer's Certification is included with this submittal. We did modify certain sections beyond those you had requested in your letter dated September 27, 1990. Attachment 1 lists revised portions of the application that we are submitting.

We believe that you will find the information submitted to be complete and look forward to receiving the construction permit. If you have any questions, please do not hesitate to contact Ellen Jurczak of Safety-Kleen Corp. (1-800 669-5740), Cynthia Norton of ERM, or me.

Sincerely,

Frederick W. Blickle, P.E.

Frederick UBlake

Senior Engineer

pih

Enclosure(s)

cc: Melissa Halebasko - Safety-Kleen, Elgin (letter only)
Joe Hartline - Safety-Kleen, Norcross
Ellen Jurczak - Safety-Kleen, Elgin
Cynthia Norton - ERM (letter only)
Jack Riggenbach - ERM (letter only)



#### **ATTACHMENT 1**

# RESPONSE TO FDER COMMENTS DATED SEPTEMBER 27, 1990 FOR SAFETY-KLEEN CONSTRUCTION PERMIT APPLICATION FILE NUMBER HC 13-175466 SAFETY-KLEEN CORP. MEDLEY, FLORIDA

#### Comment:

1. Provide a site-specific surface water management plan certified by the design engineer.

#### Response:

A site-specific surface water management plan is provided. This is a new - Exhibit numbered Exhibit I.B.6-1 and should be placed immediately following Exhibit I.B.5-1.

#### Comment:

2. Provide manufacturer's specifications which support that the containment area coating (Sikagard 62 or Concressive 1305) material is compatible with all solvents which it may contact. (Exhibit I.E. 3-10).

#### Response:

Safety-Kleen, through use and experience with this coating material, has determined that the coating is compatible with the primary solvents encountered at a Safety-Kleen facility. Safety-Kleen is attempting to have the manufacturer provide certification that the coating is compatible with the primary constituents found in Safety-Kleen's waste streams. A copy of the letter to the manufacturer requesting this information is attached. (Exhibit I.E.3-11). The manufacturer's certification will be forwarded to FDER when they are available.

#### Comment:

3. Provide manufacturer's specifications which support that the sump liner (SIC Part No. 5280) is compatible with all solvents with which it may come in contact. (Exhibit I.E. 3-10).

#### Response:

Safety-Kleen Drawing STD-1020-00 (24" Diameter Stainless Steel Sump Liner Fabrication) (Exhibit I.E.3-12) provides for a stainless steel sump liner to be

used at the Medley facility. Stainless steel is compatible with the primary constituents of Safety-Kleen's waste streams.

#### Comment:

4. Drawing D11150, solvent pump piping installation details have not, to date, been supplied to the Department. The drawing should show the location of the tank's drain line connection, vent line connection, fill line connection, and the connection of the high level alarm transmitter.

#### Response:

Drawing D11150 (Exhibit I.E.3-13) has been provided along with a replacement drawing for Exhibit I.E.3-6 and an additional drawing showing tank farm sections and details (Exhibit I.E.3-14).

#### Comment:

5. Revised portions of the construction permit application (if appropriate).

#### Response:

Since the original submittal of the construction permit application, Safety-Kleen has initiated the distributions and collection of a new immersion cleaner #699. In addition the regulations regarding waste analysis (i.e., TCLP) have been altered. Parts I.D.2a, I.D.2.b-c, and I.D.4 have been modified to reflect these changes. Parts I.D.2a and I.D.4 should be replaced in their entirety. The textual portion Part I.D.2b-c should be replaced. Exhibits I.2-1 through I.D.2-9 should be retained.

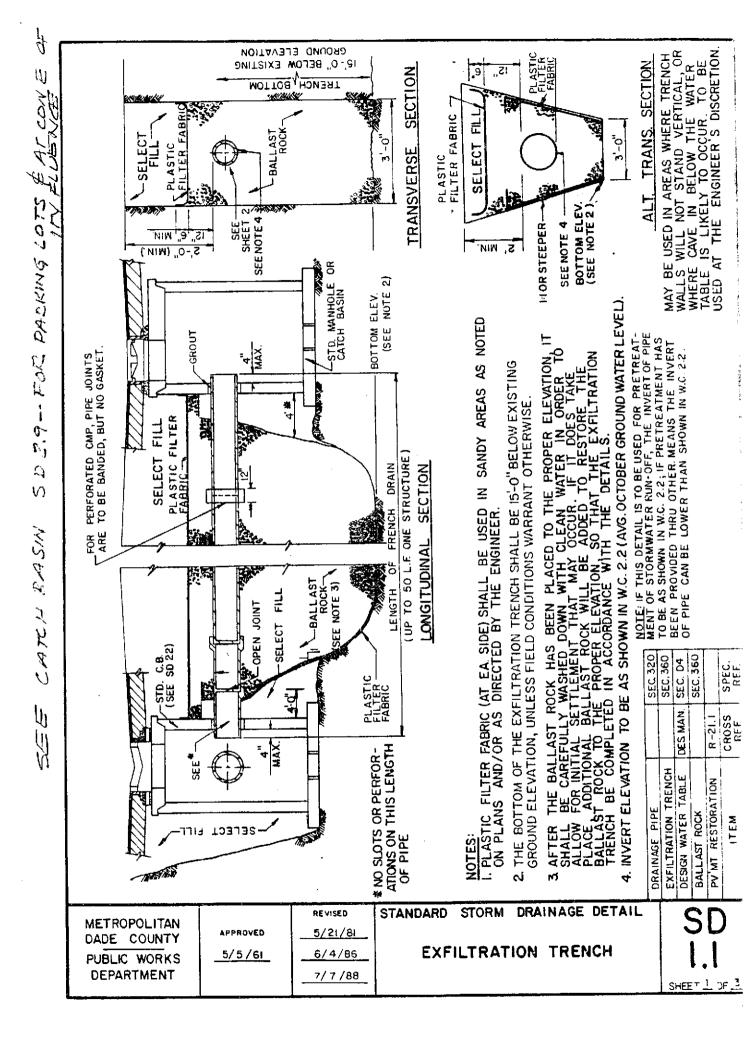
In addition to the previously identified changes, the cover page and Table of Contents should be replaced in their entirety. Exhibit I.A.20-1 should be replaced in its entirety.

#### Comment:

6. An engineer's certification for the construction permit application.

#### Response:

This is provided on Department forms.



## GENERAL NOTES FOR PIPE CULVERTS

THE CONTRACTOR HAS THE OPTION OF INSTALLING THE FOLLOWING PIPE TYPES:

A. CONCRETE - SLOTTED PIPE

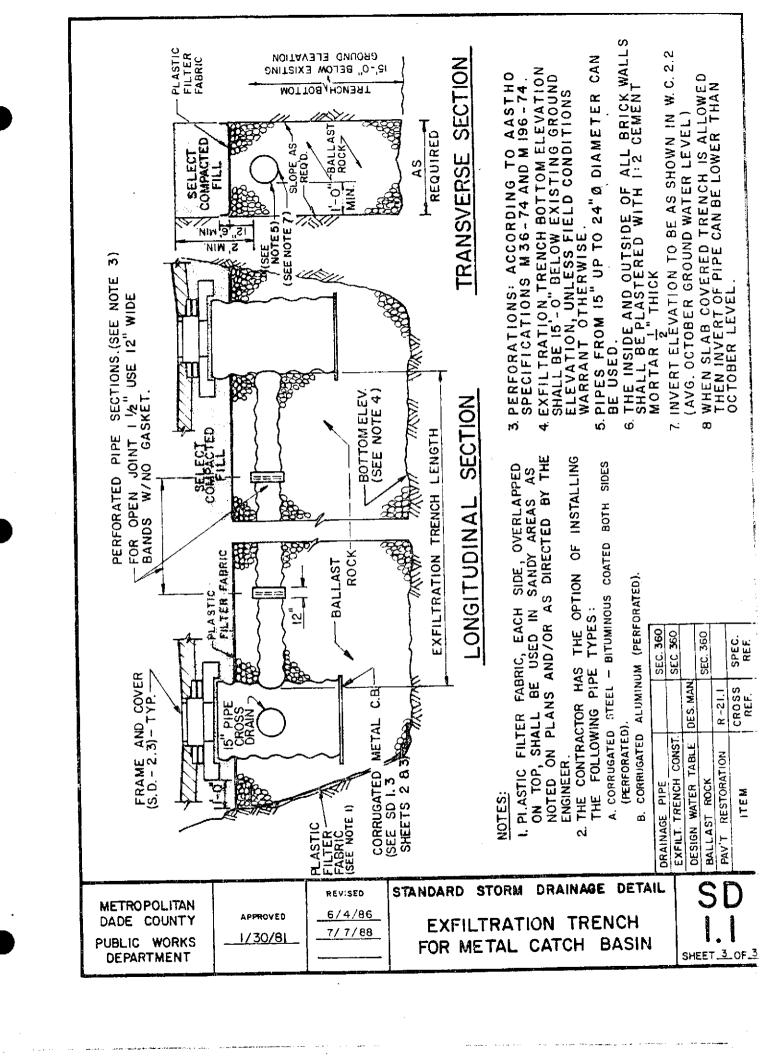
- B. CORRUGATED STEEL PIPE BIT. COATED BOTH SIDES PERF (SEE TABLE BELOW)
  C. CORRUGATED ALUMINUM (PERFORATED, SEE TABLE BELOW)
- D. CORRUGATED METAL SMOOTH-LINED PIPE

CORRUGATED STEEL & ALUMINUM PIPE CULVERTS					
	CONVENTIONAL CMP	SMOO"	TH LINED		
PIPE DIAM.	CONVENTIONAL CMP	OUTER SHELL	LINER		
(inches)	Approx. No. of 3" Dia. Holes * (PER LIN.FT. OF PIPE)	No. of 3" Dia. Holes (PER LIN. FT. OF PIPE)	No. of 5" Dia. Holes (PER LIN: FT OF PIPE)		
15	100	100	50		
18	150	120	60		
24	160	160	80		
30	200	200	100		
36	240	240	120		
42	275	275	140		
48	315	315	160		
54	355	355	180		
60	395	395	200		
72	470	470	235		
84	550	550	275		

NOTE: PERFORATIONS SHALL BE UNIFORMLY SPACED AROUND THE FULL PERIPHERY OF THE PIPE TO WITHIN 4" OF EACH END OF EACH LENGTH OF PIPE. THE NUMBER OF PERFORATIONS PER LINEAR FOOT OF PIPE AND THE DIAMETER OF THE PERFORATIONS SHALL BE AS SHOWN ON THE ABOVE TABLE.

\* 5/16 INCH DIAMETER HOLES MAY BE UTILIZED IN LIEU OF THE 3/8 INCH DIAMETER HOLES IF THE NUMBER OF HOLES IS INCREASED TO PROVIDE AN EQUAL CROSS SECTIONAL HOLE AREA. THE OTHER REQUIREMENTS REMAIN THE SAME.

			EXFILTRATION TRENCH	CROSS REF.	SEC.360 SPEC. REF.
METROPOLITAN DADE COUNTY PUBLIC WORKS DEPARTMENT	APPROVED 5/21/81	REVISED 6/4/86	DRAINAGE DETAI TON TRENCH /ERT NOTES)		3D 1.1 172053



## E. R. BROWNELL & ASSOCIATES, INC.

Engineers - Land Surveyors 3152 Coral Way MIAMI, FLORIDA 33145 (305) 446-3511

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(305) 446-3511	CHECKED BY E.S. LOFFETCG DATE
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SAFETY - KLE	EN CORP.
DRAINAGE CALC	ULATIONS
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## E. R. BROWNELL & ASSOCIATES, INC.

Engineers - Land Surveyors 3152 Coral Way MIAMI, FLORIDA 33145 (305) 446-3511

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		SEPCO DATE.		

SCALE
DESIGN DATA AND CRITERIA
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2. FLOOD CRITERIA: FLEVATION CO.T
3 WEST PIPE INVERT TO SATISFY DERM REQUIREMENTS
FOR FIRENCH DIRAINS
AVERAGE OCTOBER GROUND WATER LEVEL (W.C 2.2)
INVERT OF 15" PIDE 30
15" PIPE 1.25
COVER OVER PIPE 200
LOWEST POSSIBLE RIM ELEVATION 6.25
4. PERCOLATION TEST BASED ON TRENCH TEST PERFORMED
on the site by eatherine should a Associates
TEST DATA RESULTS & CAUCULATIONS
LENGTH = 10,0 FEET
WIDTH = 3,0 FEET
DEPTH TO WATER = 2.50 FEET
DEPTH DELOW WATER = 11.40 FEET
WATER INPUT = 1455 GALLONS
ELAPSED TIME WATER RUNNING = 4.00 MINUTES = 240 SEC 12ISE IN WATER TABLE = 2.40 FEET
EXFILTRATION PLATE: QUOT (CFS/FT)
= INPUT VOL (FT3) - VOL REMAINING ABOVE INITIAL (FT3)
(LENGTH OF TRENCH) (TIME IN SEC PULLS RUNNING)
CENGIH DE TIGENCH)
= (1455 GAL) (748 GAL) - (10,0 FT) (2,0 FT) (2.40 FT)
(10,0 FT) (240 SEC)
QOUT = 0.00 CFS/LF
800T = 0,00 CFS/LF,

## E. R. BROWNELL & ASSOCIATES, INC. Engineers - Land Surveyors 3152 Coral Way MIAMI, FLORIDA 33145 (305) 446-3511

SHEET NO. 3 OF 5

CALCULATED BY G. ZAMOIZA DATE AUG 1,1990

CHECKED BY F. S. LOFBERG DATE

<b>(565)</b> 113 2555	CHECKED BY
	SCALE
DRAINAGE CALCULATIONS	
PROP INLET +	
AREA = 12254 SO FT = 0.	28 Peres 2
C: 0.9	
I= 07 14/h-	
Q= CiA=(09)(6,7)(0,28)=1.6	,9 C.F.S. <sup>±</sup>
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L= 9/000T = 100CFS/0,00CFS	
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Joseph Sales Company	
	USE L= COO FEET
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I = 67 in/hr	
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= 20 FT.	
	: 2 L = 78 FEET
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	USE L= 80 FEET
PROP INLET #3	
AREA = 12876 FT2 = 0,29 A	4765
LC= 09	
#= GOT IN/hr	
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L= Q/QOUT = 175 CFS/0,060 C	FS/L.F.
= 29 FT	
USING A SAFETY FACTOR C	ナク L= 58 FEET
	USE L= GO FEET

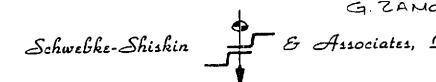
## E. R. BROWNELL & ASSOCIATES, INC.

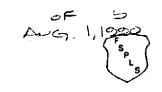
Engineers - Land Surveyors 3152 Coral Way MIAMI, FLORIDA 33145 (305) 446-3511

JOB SAFETY	KLEEN	F4402	
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PROP INLET #4
AREA = 16000 SO FT. = 0,30 Acres
c= 0,9
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Q= CiA = (0,9)(47)(4,39) = 2,35 CFS = +
L= 9/QOUT = 2.35 CFG/OCC CFG/FT
USING A SAFETY FACTOR OF 2 LE 78 FT.
USING A SAFETY FACTOR OF 2 LE 78 FT.
PROP WLET #5
AREA = 18000 GO PT = 0.43 ACRES
c= 0.9
OI = COT IN/hr
$Q = CiA = (0.9)(607)(0.43) = 2.59 CF.S. \pm$
L = Q/QOUT = 2,59 CFS/0,04 CFS/FT
USING A SAFETY FACTOR OF 2 L= 86 FT
USING A SAFETY FACTOR OF 2 L= 80 FT  USE L= 90 FEET
PROP. INLET # CO
AREA = 19450 SQ. FT = 0,45 ACRES
C=0,9
# = 60 N /hr
Q=C(A=(0,9)(67)(0.45) = 2.7) CF.5.
L= Q/QOUT = 271 eF\$/004 cF\$/FT
USING A SAFETY FACTOR OF 2 L= 90 FT
USE LE DO FEET







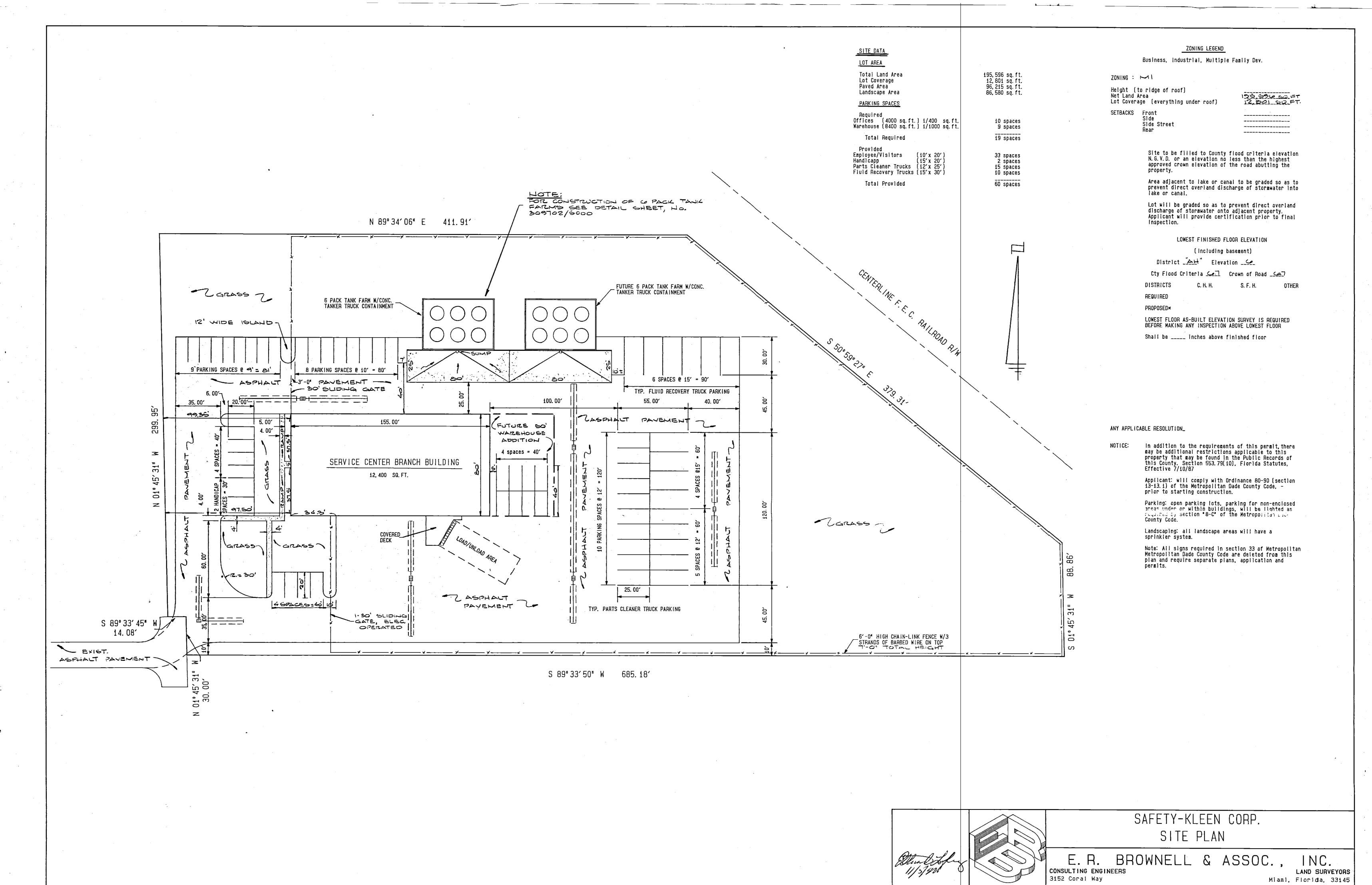
P.E. #32068

LAND PLANNERS ● ENGINEERS ● LAND SURVEYORS ● ARCHITECTS ● SOILS ENGINEERS
3240 CORPORATE WAY ● MIRAMAR, FLORIDA 33025 ● BROWARD 435-7010 ● DADE 652-7010 ● FAX 652-8284

### **TESTING DIVISION**

## TRENCH TEST

	L & ASSOCIATES KLEEN			E CONDITION 10.00	)	3.	0 ft.
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54.5 13.9	= SAND LIMEROCK				יטא חדם	<u>.                                    </u>	_ (g.P.IVI.
· ' =	=		4) Test st	tablized at: .	DID NO.	<u> </u>	<del></del>
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Elapsed Time 0.00 minutes 0.50 minutes	Water Level  0.00 feet  0.40 feet  0.80 feet			0.00 0.50 1.00	ed Time min/sec. min/sec. min/sec.	Water Lo	feet feet feet
Elapsed Time 0.00 minutes 0.50 minutes 1.00 minutes	Water Level         0.00       feet         0.40       feet         0.80       feet         1.20       feet			0.00 0.50 1.00 1.50	ed Time  _ min/sec min/sec min/sec min/sec min/sec.	Water Lo	feet feet feet
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Professional Land Surveyor No.

Drawn by: GZ
Ref.

Sheet 1 of 3

Commended Size M. H. Professional Engineer No. State of Florida

No. Date Apvd. J. N. F. B. Revision Description

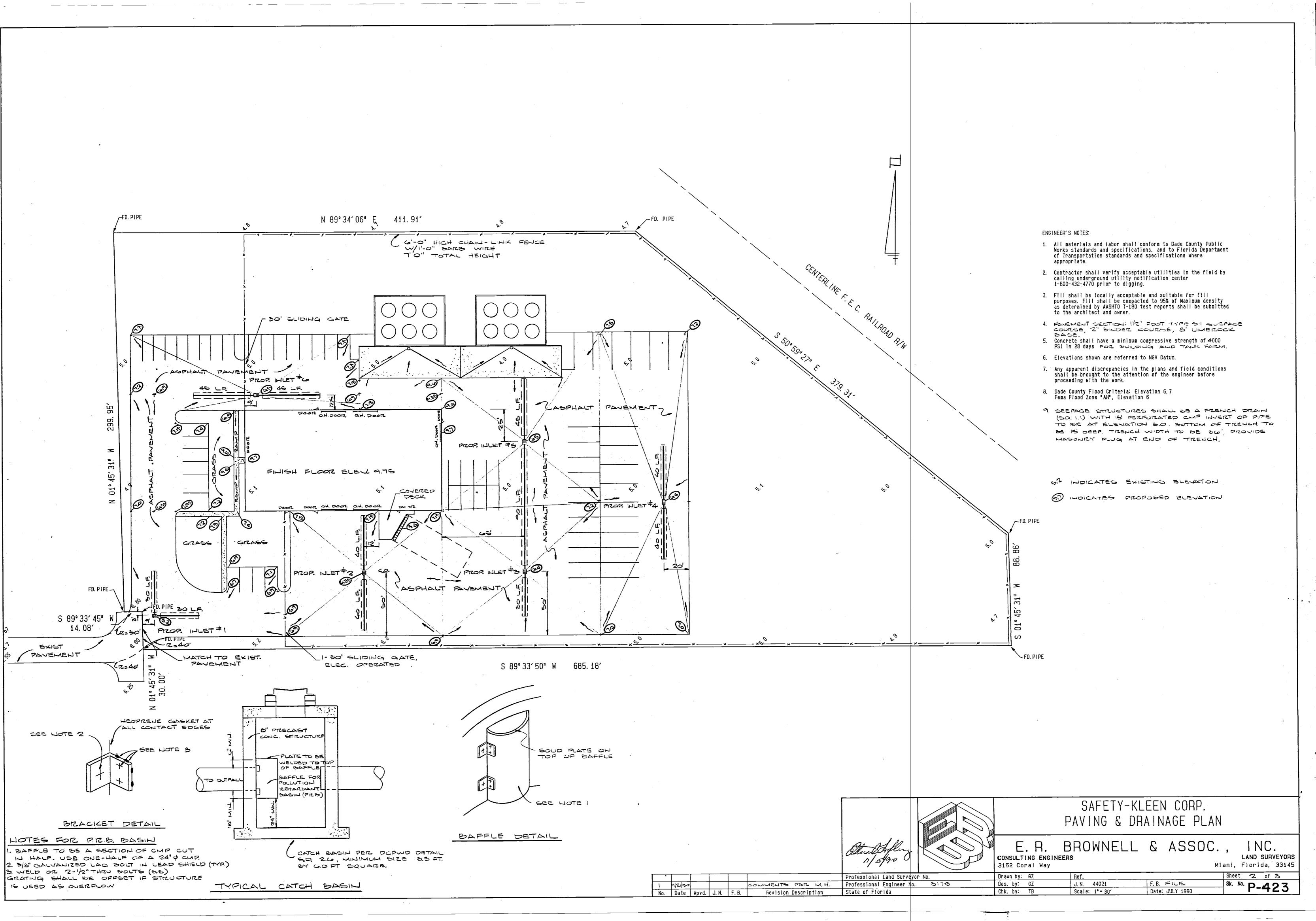
State of Florida

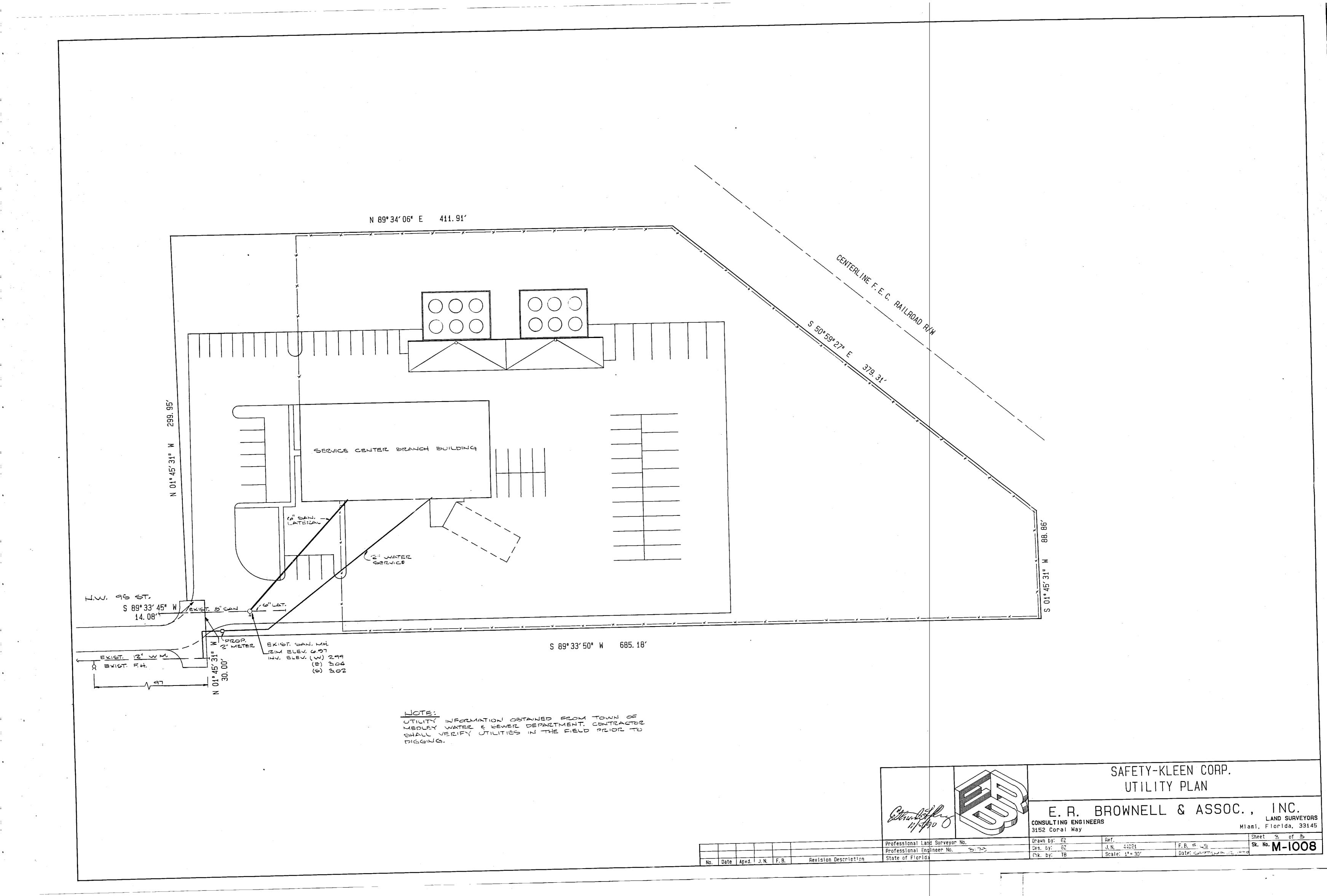
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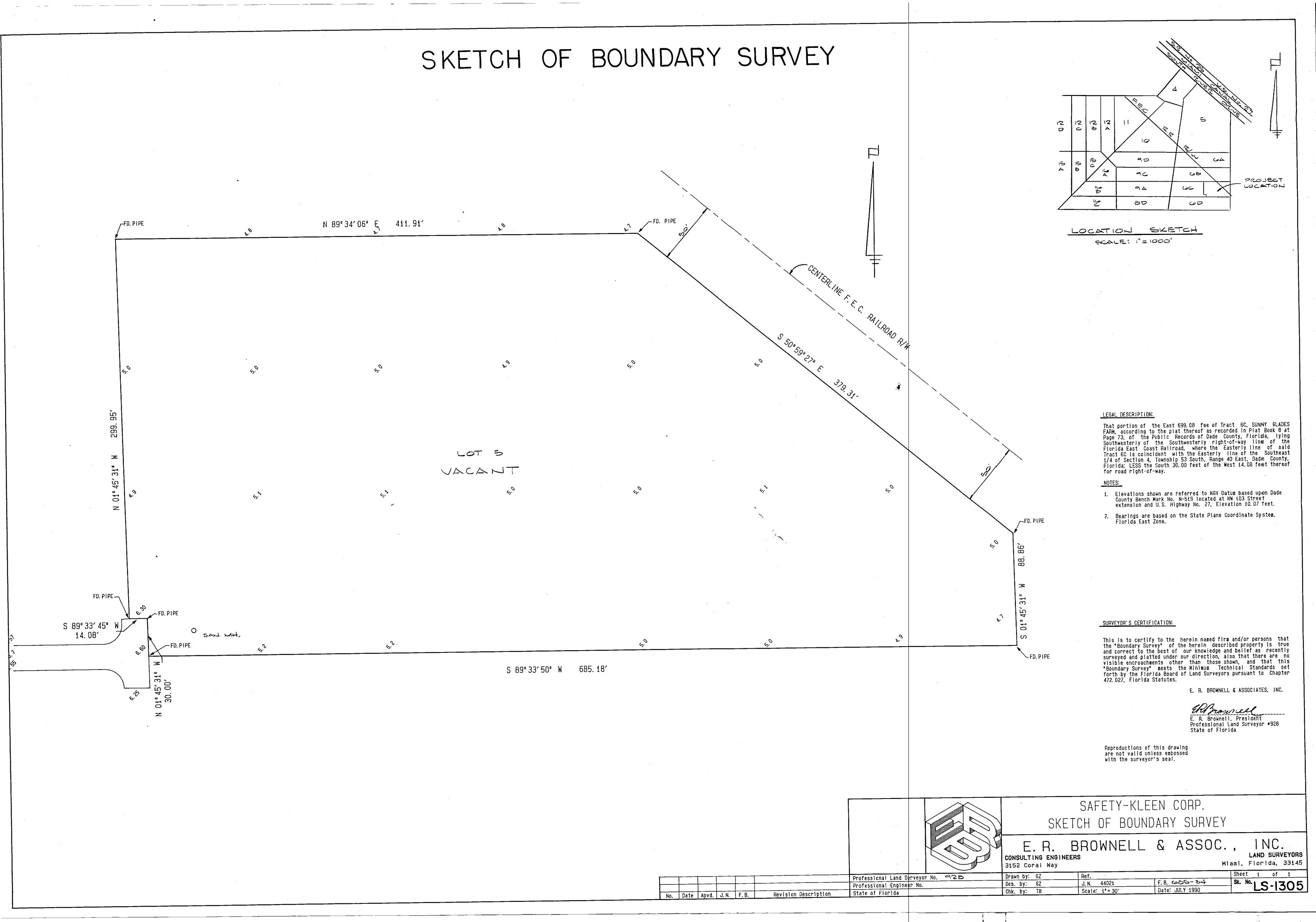
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J. N. 44021
F. B. State of Florida

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Scale: 1\*= 30'
Drawn by: GZ
J. N. 44021
Sk. No. P-423









November 9, 1990 DDD 90-135

SIKA CORP. 201 Polito Avenue Lindhurst, NJ 07071 Attn: Edwin Diaz

Subject: Testing of Sikadur 51 NS-SL

and Sika Guard 51

Dear Mr. Diaz,

Please provide Safety-Kleen Corp. with a certification letter demonstrating that your products, Sikadur 51 NS-SL and Sika Guard 62, when used to seal concrete floors are compatible with and resistant to the following chemicals:

Mineral spirits

2. Perchloroethylene

3.

Methylenechloride Cresylic acid Orthodichlorobenzene 5.

Trichlorotrifluoroethane 6.

Please forward the test information to:

Safety-Kleen Corp. O'Hare Technical Center P.O. Box 92050 Elk Grove Village, IL 60009-2050 Attn: Daniel D. Dowling

Thank you in advance for your cooperation. If you have any questions or comments please feel free to call at 312/694-2700 ext. 7044.

Sincerely.

DANIEL D. DOWLING

Project Manager Branch Constr. & Maint.

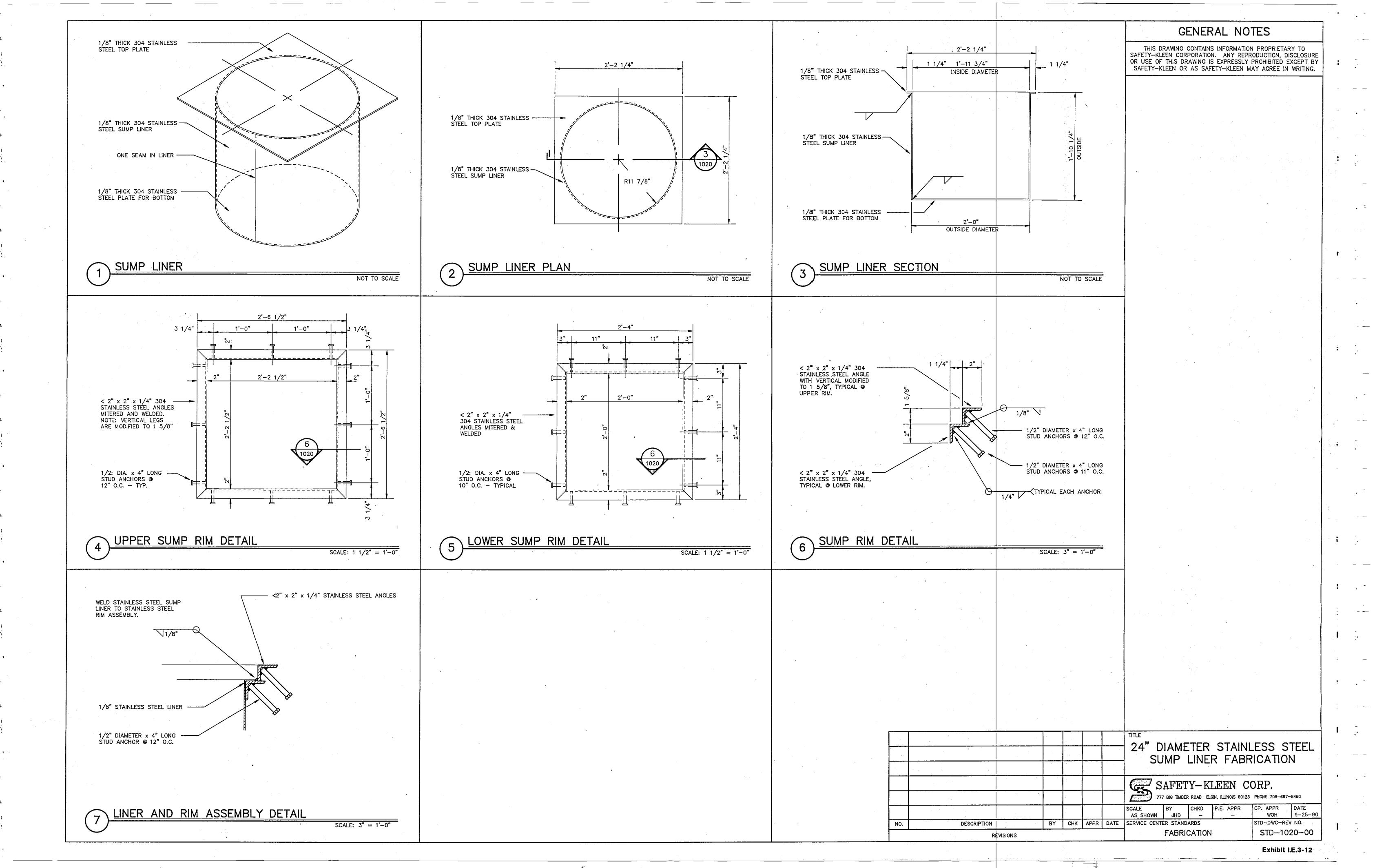
DDD:bjr

William Heyn Melissa Hlabasko Ellen Jurczak

Jack Krivec

Cindy Norton - ERM South

13112.21B/TSK1/PERMIT.COV/CMS/PJH/2/110790



## I.D.2.a DESCRIPTION OF THE BUSINESS

Safety-Kleen Corp. of Elgin, Illinois 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 hydrocarbon and chlorinated solvents and small parts washing equipment. A unique feature of this business concept is that the solvent is produced through recycling the used solvent that is leased to the customers. Approximately two-thirds of the clean solvent leased has been previously used by the customers.

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 service centers (sales branches) located in 45 states domestically that warehouse the products and equipment required to service the customers in their sales areas. On a regular 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 types of solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: a mineral spirits solvent and old and new formulations of immersion cleaner. The old immersion cleaner solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive. A new immersion cleaner is being marketed under the name #699 and will eventually replace the old immersion cleaner. It is a non-chlorinated solvent mixture.

The solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid. It contains a maximum of 1 percent total chlorinated solvents. The solvents are distributed and collected by their service representatives. Drums are transported in specially-equipped, enclosed route trucks. Clean solvents are distributed from and used solvents returned to the service center where they are stored in separate tanks for the clean and used mineral spirits bulk storage. Warehouse space is dedicated for the storage of both clean and used immersion cleaner drums. Safety-Kleen leases parts washing equipment, including partially filled 16- and 30-gallon drums, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons. The mineral spirits are collected in 16- and 30-gallon red steel drums. The 609 Immersion Cleaner is housed in 16-gallon gray steel drums. A 16-gallon gray steel drum with a red band is used for 699 Immersion Cleaner. The perchloroethylene from dry cleaning operations is collected in 16-gallon black poly drums.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the service center to deliver a load of clean solvent and pick up a load of used solvent. Mineral spirits are transported in bulk tank trucks between the service centers and the recycle facilities. The Immersion Cleaner remain in the covered drums during transfer between the service centers and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is mineral spirits, while the remainder is immersion cleaner.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the service center to the customer, from the customer to the service center, from the service center to the recycle facility and then from the recycle center back to the service center. The small quantities of residue remaining in the storage tanks at the service

centers and after distillation of the used solvent at Safety-Kleen's solvent recycling facilities are disposed of in accordance with applicable laws and regulations.

This closed loop supplies Safety-Kleen with most of its solvent requirements; the resultant stabilized cost benefits are passed on to its customers. Ownership of the solvent remains with Safety-Kleen; the service center managers are accountable for the quantities of clean and used solvents handled by their branch operations. The service center is basically a temporary storage and transfer facility. By FDER definition, however, these centers are considered to be the waste generator.

Safety-Kleen also provides a dry cleaning waste reclamation service where drums of dry cleaning wastes (chlorinated) are collected and stored temporarily at the service centers before shipment to the recycle centers for reclamation and residue disposal.

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Wastes containing various lacquer thinners and paints are collected in 5-gallon pails and in 16-gallon drums on the customer's premises. The sales representative collects these containers and stores them in the drum storage area of the warehouse. These wastes are periodically shipped to a reclaimer and there claimed solvent is distributed to Safety-Kleen customers for use as product.

In 1988, a nonhazardous waste oil collection service was initiated to service automotive service businesses. Waste oil is collected by a 3,500-gallon tanker truck which returns to the service center when full and stores the waste in one of the 20,000-gallon storage tanks. These wastes are periodically shipped to a Safety-Kleen oil re-refinery and the re-refined oil is distributed to Safety-Kleen customers for use as product. This waste is not currently regulated as a hazardous waste and is therefore not required to be permitted.

## ID2.b and c SPECIFICATIONS AND ANNUAL QUANTITIES OF HAZARDOUS WASTES

In accordance with U.S. EPA Hazardous Waste Regulations, four types of hazardous waste have been identified at the service center:

- 1. The used mineral spirits solvent, returned from customers in separate drums transferred and stored in the aboveground tank awaiting shipment to the recycle facility is considered to be an Ignitable Waste and (D001) a characteristic waste by TCLP;
- 2. The used chlorinated solvent, returned from customers in separate drums and remaining in the same drum for shipment to the recycle facility is considered to be a Listed Waste from Non-Specific sources (F002 and F004); and a characteristic waste by TCLP;
- 3. The used immersion cleaner #699, returned from customers in separate drums and remaining in the same drum for shipment to the recycle facility, is considered a characteristic waste by TCLP;
- Mineral spirits, dumpster mud, and tank bottom sludge accumulated in the solvent return receptacles (wet dumpsters) and in the sludge tank, is considered to be an Ignitable Waste (D001) a characteristic waste by TCLP; and
- 5. The spent halogenated solvents, collected from dry cleaning facilities in separate drums and remaining in the same drum for shipment to the recycle center, is considered to be a Listed Waste from Non-Specific Sources (F002) and a characteristic waste by TCLP.

Revision: 11/08/90

11312.21B/TSK1/ATTID2.BC/CMS/PJH/110790

6. Paint waste is considered to be a listed waste from nonspecific sources (F003 and F005) or a characteristic waste by TCLP.

TCLP waste codes which may apply to any of the waste streams may include D004 through D011; D018, D019, D021 through D030, and D032 through D043.

A typical composition, and chemical physical analysis for each of the waste streams listed above are shown in the attached chemical analyses reports (Exhibits ID2-1 through ID2-10), based on existing data on these wastes generated from similar processes within Safety-Kleen's current and/or potential customers.

#### **USED MINERAL SPIRITS**

The clean mineral spirits solvent is labeled under the trade name of "Safety-Kleen 105 Solvent", so-named because of the flash point of the solvent being 105°F (minimum). Chemically, the solvent primarily consists of petroleum hydrocarbon fraction (the mineral spirits) with boiling points between 310°F and 400°F. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume. The mineral spirits constituted over 99.5 percent of the total volume of the solvent.

The used mineral spirits solvent consists primarily of mineral spirits solvent plus water, solid, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however, at times, the water content may range from one percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent, by volume, in the used solvent.

Chemically, the composition of the solvent fraction in the used mineral spirits solvent is essentially the same as the clean solvent, as shown in analyses.

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An estimated 243,000 gallons of used mineral spirits are expected to be shipped to a recycle center from this facility annually.

## **USED IMMERSION CLEANER**

The clean chlorinated solvent is labeled under the trade name of "Immersion Cleaner and Carburetor and Cold Parts Cleaner #609." It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (a sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive.

A new "Immersion Cleaner and Carburetor and Cold Parts Cleaner #699" is also being leased. It is a heavy aromatic naphtha, N-methyl-2-pyrolidon dipropylene glycol methyl ether, monoethanolamine and oleic acid, and contains a maximum of 1 percent total chlorinated solvents.

The used immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is non-flammable. It is regarded as toxic because of the contents of various solvents.

It is anticipated that 5,500 gallons of used immersion cleaner will be stored at this facility annually.

## USED MINERAL SPIRITS BOTTOM SLUDGE

This is material settled from used mineral spirits in the aboveground tanks. It contains basically soils, oil and grease, and some water picked up in the degreasing operations, together with a small amount of mineral spirits. Analyses have shown

**ID2-6** 

Revision: 11/08/90

that the sludge is an ignitable waste and might also be considered toxic using TCLP standards.

The sludge is removed from the aboveground tank periodically and shipped to Safety-Kleen's facility for reclamation.

## USED MINERAL SPIRITS DUMPSTER MUD

This waste material is accumulated in the wet dumpsters when emptying the used mineral spirits from the drums into the aboveground storage tanks. The nature of this waste is similar to the used mineral spirits bottom sludge, except with some small metal parts and less mineral spirits. It is regarded as an ignitable waste and often is also considered a characteristic waste using TCLP standards.

The sludge in the dumpsters is cleaned out frequently. The waste is drummed and shipped to Safety-Kleen's facility for recycling. Approximately 150 drums (1,500 gallons) of dumpster sludge will be removed from this service center each year.

### DRY CLEANING WASTES

Solvent used in dry cleaning of clothing is commonly tetrachloroethylene (or perchloroethylene). Hence, waste generated from dry cleaning operations contains various concentrations of the solvent. Basically, wastes generated by dry cleaning facilities are in the following forms.

 Cartridge Filter: In addition to the construction materials consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.

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- 2. Muck: At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of the cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by this medium, between 40 and 50 percent by weight of the "muck" is absorbed solvent.
- 3. Still Residue: After filtration, the dry cleaning solvent is distilled by the dry cleaning machine to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent.

#### PAINT WASTES

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints (D006, D007, and D0098). The waste is collected in black 5-gallon pails and 16-gallon drums at the customer's place of ;business and the containers are then palletized and stored in the drum storage area of the warehouse. It is anticipated that this facility will ship 19,500 gallons of paint waste to a reclaimer annually. Analytical results for paint wastes are in Exhibit 2-5.

#### **DESIGN CAPACITY**

All wastes managed at this facility are stored either in a tank or in containers, as follows:

Waste	Storage Unit
Spent Mineral Spirits	A 20,000-gallon tank
Dumpster Sediment	
Spent Immersion Cleaner	6,912 gallons in containers
Dry Cleaner Wastes	
Paint Wastes	

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## I.D.4 WASTE ANALYSIS PLAN

#### **GENERAL**

The used solvents are the primary feed stock for regeneration of Safety-Kleen's clean solvent products. Quality control of the used solvents is critical to the Recycle Center to safely recycle the material and to assure quality products. The closed loop system of managing the clean and used solvents is therefore designed to minimize the possibility of product contamination from outside sources. Within the closed loop, ownership of the material remains with Safety-Kleen and the product is leased to the customer.

Prior to leasing a parts cleaning machine, the customer's business activity is reviewed. Where the possibility exists for contamination of the mineral spirits, i.e., pesticide, herbicide, pharmaceutical, printing operations, the process is reviewed to ensure that contamination of the product does not occur.

Sales representatives are instructed to visually examine the spent product when the machines are serviced, noting the consistency and volume of material recovered. If problems are noted, the machine is removed from the customer.

The dry cleaning wastes are collected from dry cleaning facilities where only a single chemical is handled at the facility and chances of cross contamination by other chemicals or wastes are minimal. In addition, each shipment from the dry cleaning facility will be manifested with signature of the owner (generator) for the type of materials contained in the drums.

All the materials collected at the Service Center and subsequently shipped to the Safety-Kleen recycle facility are either managed at all times in the closed loop system or will be collected from a single purpose process. General nature and quality of these materials are known and Safety-Kleen's operating experiences have shown that

the collected materials do not usually deviate from expectation and impact the recycling process. As an additional safeguard, Safety-Kleen's personnel are instructed to inspect all materials before returning them to the service centers.

For these reasons, all waste analyses are performed at the recycle facility, as described in the following section, and only visual and physical inspection is conducted in conjunction with service center operations.

In accordance with 40 CFR 264.13(a), Safety-Kleen will also perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste to be collected does not match the waste designated. It is Safety-Kleen's practice that suspected nonconforming material must not be accepted until an analysis has been done or the material must be rejected.

## WASTE ANALYSES AT THE RECYCLE FACILITY

Analyses performed at the recycle facilities are undertaken to safeguard the recycling process and to assure the product quality. The following tables summarize a typical waste analysis plan at the recycle facility related to the hazardous materials returned from the service center:

Table I.D.4-1 Parameters and Rationale for Hazardous Waste Identification

Table I.D.4-2 Parameters and Test Methods

Table I.D.4-3 Methods Used to Sample Hazardous Wastes

Table I.D.4-4 Frequency of Analysis

In addition to the aforementioned analyses, TCLP analyses for all compounds, except pesticides, will be conducted every five years on all characteristic hazardous waste streams (example; used mineral spirits, 699 IC). Any compounds which are positively

ID4-2

TABLE I.D.4-1

## PARAMETERS AND RATIONALE FOR HAZARDOUS WASTE IDENTIFICATION

ŀ	Iazardous Waste	Parameter <sup>a</sup>	Rationale
1.	Used Immersion Cleaner (609IC)	Methylene Chloride Orthodichlorobenzene Cresylic Acid	Formula contains these ingredients: F002 & Cresylic Acid F004
2.	Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
3.	Used Mineral Spirits	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
4.	Mineral Spirits Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
5.	Mineral Spirits Dumpster Mud	TCLP Flash Point	The sludge and free water may contain these compounds and the sludge has a flash point of 105° F (D001)
6.	Dry Cleaning Wastes	Perchloroethylene Trichlorotrifluoroethane Mineral Spirits	Contain ingredient of F002 or contains a hazardous constituent. Ignitable characteristics D001
7.	Paint Wastes	TCLP	May contain ingredients of F003 or F005.

<sup>&</sup>lt;sup>a</sup> TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.

TABLE I.D.4-2
PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference	
pН	pH Meter	ASTM Standard D1293-65	
Flash Point	Tag closed cup tester	ASTM Standard D56-79	
TCLP	Toxicity Characteristic Leaching Procedure	40 CFR 261, Appendix II	
Hydrocarbons and Volatile Organics	Gas Chromatography (GC)	Modified Methods Based on "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods," SW-846, USEPA and ASTM Standards	

TABLE I.D.4-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
Used Immersion     Cleaner - 609IC	Sampling a drum "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, SW-846, USEPA	Representative composite sample using drum sampler
2. Used Immersion Cleaner - 699IC	Same as 1	Same as 1	Same as 1
3. Used Mineral Spirits	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanksBomb sampler (similar to weighted bottle sampler)
4. Mineral Spirits, Tank Bottom Sludge, and Free Water	Same as 3	Same as 3	Same as 3
5. Mineral Spirits Dumpster Mud	Same as 1	Same as 1	Same as 1
6. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
7. Paint Wastes	Same as 1	Same as 1	Same as 1

TABLE I.D.4-4
FREQUENCY OF ANALYSIS

Hazardous Waste	Frequencya	
1. Used Immersion Cleaner 609	Gas chromatograph annually TCLP every five years	
2. Used Immersion Cleaner 699	Gas chromatograph annually TCLP every five years	
3. Used Mineral Spirits	Gas chromatograph annually Flash point annually	
4. Mineral Spirits, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP every five years	
5. Mineral Spirits Dumpster Mud	Gas chromatograph annually TCLP every five years	
6. Dry Cleaning Wastes	Gas chromatograph annually TCLP every five years	
7. Paint Wastes	Gas chromatograph annually TCLP every five years	

In accordance with 40 CFR 264.13(a), Safety-Kleen will also perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste to be collected does not match the waste designated.

detected in the waste stream will be added to the parameter list for that waste stream on Table I.D.4-1.

# HAZARDOUS WASTE CONSTRUCTION AND OPERATING PERMIT APPLICATION HAZARDOUS WASTE STORAGE FACILITY SAFETY-KLEEN CORP. SERVICE CENTER MEDLEY, FLORIDA

**JANUARY 17, 1990** 

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#### LIST OF EXHIBITS

(Exhibits are presented at the end of each Section)

#### Exhibit No. I.A.20-1 Florida Application for a Hazardous Waste Facility Permit I.A.20-2 US EPA Part A Permit Application I.B.3-1 Regional topographic Map (USGS) I.B.3-2 Well Information I.B.3-3 Sewer Information I.B.3-3a Traffic Pattern Map I.B.3-4 Wind Rose I.B.3-5 Site Plan I.B.3-6 Floor Plan I.B.4-1 Topographic Map (1'' = 200' scale)LB.5-1 Flood Plain Map I.B.6-1 Surface water Management Plan I.C.1-1 Zoning Map I.D.2-1 Analyses of Spent Mineral Spirits (2 pages) I.D.2-2 Analyses of Mineral Spirits Dumpster Sediment I.D.2-3 Analyses of Spent Immersion Cleaner I.D.2-4 Analyses of Dry Cleaner Wastes (6 pages) I.D.2-5 Analyses of Paint Wastes (6 pages) I.D.2-6 Mineral Spirits Product Specifications I.D.2-7 Immersion Cleaner Product Specifications I.D.2-8 Dry Cleaner Perchloroethylene Product Specifications I.D.2-9 Lacquer Thinner Composition I.D.4-1 Parameters and Rationale for Hazardous Waste Selection I.D.4-2 Parameters and Test Methods I.D.4-3 Methods Used to Sample Hazardous Wastes I.D.4-4 Frequency of Analysis I.E.2-1 **Emergency Information Sheet** I.E.2-2 Spill Report Telephone Log I.E.2-3 Employees' Functions During an Emergency I.E.2-4 Material Safety Data Sheet for Mineral Spirits

# LIST OF EXHIBITS - Continued

I.E.2-5 I.E.2-6 I.E.2-7	Material Safety Data Sheet for Immersion Cleaner Material Safety Data Sheet for Perchloroethylene Material Safety Data Sheet for Lacquer Thinner
I.E.2-8	Letter to Local Policy Department
I.E.2-9	Letter to Local Fire Department
I.E.2-10	Letter to Local Hospital
I.E.2-11	Primary and Alternate Evacuation Routes
I.E.3-1	Construction Specifications for 30-Steel Barrels
I.E.3-2	Construction Specifications for 16-Gallon Steel Barrel (4 pages)
I.E.3-3	Dry Cleaner Waste Drum Specifications (3 pages)
I.E.3-4	20-Gallon Dry Cleaner Waste Container Specifications
I.E.3-5	Paint Waste Container Specifications
I.E.3-6	Tank Farm Details (309702-5000-01)
I.E.3-7	Typical Aboveground Storage Tank Fabrication Details (D13073)
I.E.3-8	High Level Alarm System-Installation Details (D13102)
I.E.3-9	Used Solvent Tank Installation Details (D11124)
I.E.3-10	Typical Concrete Construction Details (D11322)
I.E.3-11	Manufacturer's Information on Coating
I.E.3-12	24" Diameter Stainless Steel Sump Liner (STD-1020-00)
I.E.3.13	Solvent Pump Piping (D11150)
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I.E.4-2	Emergency Response Equipment
I.E.4-3	Schematic Sprinkler Plan-Warehouse and Dock Areas
I.E.5-1	List of Branch Employees
I.E.5-2	Job Descriptions (5 pages)
I.E.5-3	Trainer Qualifications (7 pages)
I.E.5-4	New Branch Manager Training (2 pages)
I.E.5-5	Introductory and Annual training Topics for Branch Employees
I.E.5-6	Training Topic Log
I.F.1-1	Anticipated Schedule for Closure
I.F.2-1	Financial Assurance for Closure
I.F.3-1	Certification of Liability Insurance

## **LIST OF EXHIBITS - Continued**

II-1	Warehouse and Return/Fill Station Plan
II-2	Warehouse and Return/Fill Station Foundation Plan
II-3	WarehousePallet Layout Plan
III-1	Dock Plan (Return/Fill Area)
III-2	Dumpster Final Assembly Details
III-3	Solvent Pump Piping Installation Details
III-4	Pipe Bridge Plan

RESPONSE 6

OER form s 17-730900(2)	
Form Ties. Ac. for a Hazardous Waste Facility Perm	_
Electric Criss June 1, 1990	_
DER Approximent No.	_[
(Filed in by DER)	- 1

EXHIBIT I.A. 20-1

# Application for a Hazardous Waste Facility Permit

### Part I - General

To Be Completed By All Applicants

Ple	ase type or Print
A.	General Information
1.	Type of Facility:  Disposal Landfill Land Treatment Surface Impoundment Miscellaneous Units  Storage X Tanks X Piles Surface Impoundment Miscellaneous Units  Treatment Piles Incineration Surface Impoundment Miscellaneous Units
2.	Type of Application: TOP X Construction Operation Closure RD&D
3.	Application Submittal: New Revised
4,	Date current operation began (or is expected to begin):01/05/91
j.	Facility Name: Safety-Kleen Corp. (3-097-02)
6.	EPA/DER I.D. No.: Applied For
7.	Facility location or street address: East of NW 89th Ave. & 96th St., Medley, FL 33166
8.	Facility mailing address: Safety-Kleen Corp., 777 Big Timber Rd., Elgin, II. 60123 Street of PO. Box City State Zip
9.	Contact person: Mr. Joe Hartline Telephone: (_708 ) 697-8460
	Titte:Environmental Regional Engineer
	Mailing address: 777 Big Timber Road Elgin, IL 60123 Street or P.O. Box City State Zip
	Operator's name: Safety-Kleen Corp. Telephone: ( 708 ) 697-8460
11.	Operator's address: 777 Big Timber Rd. Elgin, IL 60123 Street or PO. Box City State Zip
12.	Facility owner's name: Safety-Kleen_Corp.
13.	Facility owner's address: 777 Big Timber Rd. Elgin, IL 60123  Street or PO. Box City State Zip
14.	Legal structure: X Corporation Non-Profit Corporation Partnership Individual  Local Government State Government Federal Government Other
15.	If an individual, partnership, or business is performed under an assumed name, specify county and state where name is registered.
	County: State:N/A
16.	If a corporation, indicate state of incorporation <u>Wisconsin</u> .

OER Form 17-730.90	xo(z)
Form Time Ad. for a Ha	zardous Waste Fecility Permit
Electro Care June 1, 1	1990
DER Application No	
	(Filed in by CER)

17.	If an individual or partnership list owners:  Name:							
	Address:Street or PO. Box				_			
	Name:	City	State		Zip			
			<u> </u>					
	Address:Street or P.O. Bax	City	State	·	Zip			
	Name:				, i			
	Address:Street or PO, Box							
	Street or PO, Box Name:	Cay	State		Zip			
	Address:				· · · · · · · · · · · · · · · · · · ·			
4.0	Street or PO. Sox	City	State		Zip			
18.	Site ownership status: X Owned To be purchased			ears				
	Presently leased: Expiration date	If lea	ised, give:					
	Land owner's name <u>Safety-Kleen Corp.</u>			··				
	Land owner's address 777 Big Timber Road Street or PO. Box	Elgin	I	L	60123			
	Engineer: Frederick W. Blickle	City  Registration I	State 3940	9	Zip			
	Address: 9501 Princess Palm Ave. #100	Tampa	FL		33619			
	Street or PO. Box Associated with: ERM-South, Inc.	Cav	State		Zip			
	Facility located on Indian land: Yes X No	-	•					
	ixisting or pending environmental permits: (Attach a separate sheet if necessary)							
	New 70	ency	Permit	Date	Expiration			
			Number	Issued	Date			
1			ŀ					
3.	Site Information							
		. Nearest commun	itv: Med	lev				
1. 8	Facility location: County:Dade			-				
1. (	Facility location: County:Dade Latitude: _N 250 51! 90" L			1еу 23"				
1. <i>i</i> 2. <i>i</i> 3. <i>i</i>	Facility location: County:	Longitude: W 8	30° 20'	23"				
1. <i>i</i> 2. <i>i</i> 3. <i>i</i>	Facility location: County:Dade  Latitude:N25051'90"L  Area of facility site (acres):4.50	ongitude: W 8	present, and followe and con	23"				

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DER Form c	30.900(2)
Form Tot Ao. 1	or a Hazardous Waste Facility Permit
Energy One Ju	une 1, 1990
CER ADDICATION A	(F4ed in by DER)

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_					
C. Land Use	Information				
1. Present zo	oning of the site? <u>M_1</u> Light manu	ufacturing/Indu	etru .		<del></del>
2. If a zoning	g change is needed, what should new zoning	be? N/A	3614	·	
3. Present la	nd use of site 7777 7	0e:N/A			
or resent ig	nd use of site <u>Undeveloped</u>	To be industri:	al		
D. Operating	Information	<del></del>		<u> </u>	
1. Is waste g	enerated on site? X Yes No List	the SIC codes (4 digit)		<u>.</u>	· <del>·</del>
739					
		5013			
ardous wa	rief description of the facility operation, nature of ste	the business, and activitie	es that generate, treat,	store or dispose	e of haz
3. Using the	following table and codes provided, specify, (auding design capacities) at the facility, and (2) to	1) each process used for	treating storing or	dinamelae et b.	
waste (inclu	uding design capacities) at the facility, and (2) the annual quantities, to be treated stored or	te hazardous waste for wa	u eaung, storing, or decises.	uisposing of ha	izardous
		disposed by each proc	ess at the facility (Sa	itea in 40 CFR f	-art 261
process co	odes and units).	- 17 - 17 - 17 - 17 - 17 - 17 - 17 - 17	os at the facility. (Se	e mshochons n	or list of
Process	Process Design Capacity	Hazardous	Annual O		
Code	and	Waste	Annual Quar Hazardous Wa	itity of	
	Units of Measure	Code	Units of Me	sie and asure	
S02	Storage Tank	D001	······································		
		D018 D039	803	T	
<u>S01</u>	Container Storage Area	D001 D008			
		D007,D039	10	ф —	
		F002,D006			
		D008,D007	· · · · · · · · · · · · · · · · · · ·		
		F004,D007	28	T	
		D022	20		i
		F002	271	T	
	D001.	0006,D007,F003			
	F005,E	•	69	Ţŗ	
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D006,D007,D008,D018 D021,D027,D039,D040

DER Form 4	17-730.900(2)
1.	for a Hazardous Waste Facility Permit
Effective Case	
OER Applicator	
V.: ( ) ( )	(F4ed in by OER)

# Application for a Hazardous Waste Facility Permit Certification

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1.	Operator  I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel property gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Regulation. It is understood that the permit is only transferable in accordance with Section 17-730, FAC, and, if granted a permit, the Department of Environmental Regulation will be notified prior to the sale or legal transfer of the permitted facility.				
	Signature of the Operator or Authorized Representative*		Name a	nd Title (Please Type or Pri	or\
	*Attach a letter of authorization	Date:		_ Telephone No. (	
2.	Facility Owner				
	This is to certify that I understand this application is submitted dous waste management facility on the property as describ are jointly responsible for compliance with the provisions of C of Environmental Regulation.	ed. As owner of t	the facility I un	iderstand fully that the fa	cility operator and
	Signature of the Facility Owner or Authorized Representative*	<del> </del>	Name or	id Title (Please Type or Prid	
	*Attach a letter of authorization	Date:		_ Telephone No. ()	
3.	Land Owner  This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. For hazardous waste disposal facilities, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR §264.119 and §265.119, as adopted by reference in Chapter 17-730, FAC.				
	Signature of the Facility Owner or Authorized Representative*				
	*Attach a letter of authorization	Date:		d Title (Please Type or Prin Telephone No. ()	•
4.	Professional Engineer Registered In Florida (Where Required by Chapter 471, F.S. or not exempted by Rule 17-730.220(5), F.A.C.) This is to certify that the engineering features of this hazardous waste management facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Regulation.				
	Frederick W. Blitt on	F	rederick	W. Blickle	
	Signature		١	Name (Please Type)	
	Florida Registration No.: 39409	Mailing add	ress: <u>9501</u>	Princess Pal	m Ave. #100
	•	Tampa		FL	33619
	(Please Affix Seal)	Date:	9/90	State . Telephone No. ( <u>813)</u>	4.p 622-8727
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