File/Application No. H013-216311 Applicant Name Safety Kleen / Medley

I hereby state that the environmental engineering features described in the referenced application and its additional information submittals, if any, provide/~~do not provide~~ reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes and Florida Administrative Code Title 17. The review was limited to the Chapter 17-730, F-A-C. aspects of the proposed project. In addition, I have not evaluated aspects of the project outside my area of expertise (including but not limited to the electrical, mechanical and structural features).

This review was conducted by Knox McKee.
Name

Vivek Kamath
VIVEK S. KAMATH, P.E. (SEAL)

2/8/94
DATE

FOR FILING ONLY

DO NOT MAIL

Department of Environmental Protection

JUL 22 1996

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Ercole, CHMM
Environment, Health and Safety Manager
Safety-Kleen Corporation
8755 NW 95th Street
Medley, Florida 33166

HW-Safety-Kleen/Medley
Dade County

RE: Request for Minor Modification (#HO13-291651) to Permit #HO13-216311 for Safety-Kleen Facility (EPA ID #FLD984171694) in Medley, Florida; Request to handle spent mercury-containing lamps.

Dear Mr. Ercole:

The Department has reviewed your modification request, as referenced. The information which you have furnished enables the Department to grant the following Class I, minor modification:

* On July 5, 1996, the Department received an application to modify a hazardous waste operation permit, # HO13-216311. The modification will provide for handling mercury-containing lamps as transfer waste. A designated storage area will be established in the transfer waste area. The modification is considered to be a class I modification, as per 40 CFR Part 270.42, Appendix I, A(1).

This letter must be attached to the original permit and become part of the permit.

A person whose substantial interests are affected by this modification may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Modification. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this modification. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This modification is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this modification will not be effective until further Order of the Department.

When the Order (Modification) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The

Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Should you have any questions, please contact Vincent Peluso of this office, telephone number 407-681-6673.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Vivek Kamath 7/19/96
Vivek Kamath, P.E. Date
Waste Program Administrator
Southeast District

VK/JJ/vp

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT MODIFICATION and all copies were mailed before the close of business on JUL 22 1996 to the listed persons.

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Andrell J Marie JUL 22 1996
Clerk Date

Copies furnished to:

FDEP/WPB Hazardous Waste Section Permit File
Doug Outlaw, FDEP/Tallahassee
Kent Williams, RCRA Permitting, USEPA/Atlanta

transfer wastes to avoid the potential of accidental breakage.

SK plans to provide customers with 4 and 8 foot boxes which will hold up to 39 lamps. Boxes will be inspected prior to shipment. Boxes containing broken lamps will not be accepted. Should lamps be broken while in our custody, the entire contents of the box will be placed in plastic containers and sealed. Boxes received at the branch will be placed on pallets and shrink wrapped prior to being sent to the recycle facility.

If you have questions or comments regarding this permit modification I can be reached at 407-734-2560. As usual, it is a pleasure working with the West Palm Beach Staff. I enjoyed the open house and meeting many members of different Staffs.

Sincerely,

Jon Ercole

Jon Ercole, CHMM
Environment, Health and Safety Manager

Enc: Part B attachment showing waste storage areas.
David Kelly's May 14, 1996 letters.
Modification fee checks 102610 and 102611

cc D.A.Ridley, Regional Environmental Manager
T. Sholl, Resource Recovery Branch Manager
E. Genovese, Resource Recovery Branch Manager
999 file 1010

DOCUMENT APPROVAL SLIP

(Attach to Document File Copy)

PROJECT: SAFETY-KLEEN / MEDLEY

LOCATION: DADE COUNTY

PERMIT or CASE NO: HO 13-216311

SUBJECT: RELOCATION OF A SPENT SOLVENT PUMP.

DATE: 2/4/94

DOCUMENT ORIGINATOR SIGNATURE: J. Kent McKee, Jr.

APPROVED BY: V. Kamath

APPROVED BY:

APPROVED BY:

FOR SIGNATURE BY DISTRICT MANAGER/ASST. DISTRICT MANAGER

Modification of H013-216311

SOUTHEAST DISTRICT PERMIT PROCESSING WORKSHEET

LOGGING

NAME OF PROJECT SAFETY-KLEEN/MEDLEY

PROJECT LOG NO: H013-291651 COUNTY DADE

DATE APPLICATION RECEIVED 7/5/96 30-DAY (HW 60-DAY) DATE 8/3/96

AMOUNT OF FEE PAID $250.00 COPIES OF PLANS ____

COPIES OF ~~APPLICATION~~ letter 1 COPIES OF SPECIFICATIONS ____

COPIES TO: CORPS__; LOCAL PROGRAM__; TALLAHASSEE__; DNR__; OTHER__

PERMIT REVIEW

PERMIT ASSIGNED TO PELUSO, VINCE AMOUNT OF FEE REQ'D $250.00

DISCHARGE TO OR LOCATED IN AQUATIC PRESERVE: Yes__ No __ N/A ✓

PERMIT STATUS AND CHRONOLOGY

DATE	REVIEWER'S INITIALS	COMMENTS
7/17/96	JMY	Minor Modifications as noted.

(continue on reverse side)

FIELD INSPECTION BY: ____ DATE ____; N/A ✓

WATER MANAGEMENT COMMENTS (DATE) ____; N/A ✓

LOCAL PROGRAM APPROVAL (DATE) ____; N/A ✓

GPSI, APIS, OR PWS UPDATE DRAFTED: Yes ____ ; N/A ____

GMS+01 5013P02447

PUBLIC NOTICE LETTER ISSUED/PUBLISHED (DATES) ____ ; N/A ✓

APPLICATION COMPLETION DATE 7/5/96 > DEFAULT DATE ____

>> D.A.S. 90+ DAYS INACTIVITY AUTHORIZATION: ____OK ____DENY <<

COMMENTS: ____

PERMIT, EXEMPTION, DENIAL DRAFTED BY: V. Peluso DATE: 7/18/96

INTENT: PROGRAM HEAD ____ PROGRAM ADM. ____

FINAL DRAFT REVIEWED BY: ____ DATE: ____

FINAL DRAFT APPROVED BY: ____ DATE: ____

****

FINAL PROCESSING

DISTRIBUTION BY: ____ DATE: ____

PATS UPDATED BY: Barb DATE: 7/22/96

GPSI, APIS OR PWS UPDATED BY: ____ DATE: ____

WORD PROCESSOR: ____

7/5 J. Jones

Florida Department of Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

PERMIT DATA FORM

HO 13 216311

PROJECT SOURCE NAME SAFETY-KLEEN/MEDLEY

Type Code HO Subcode MM Check If: ___GP ___Exempt

Correct Fee 250.00
Amount Received 250.00
Amount Refund ____

Permit Processor's Initial VP Data Entry Operator's Initial MCH

Comments

H013-291651

No. 1024611

Check No. 1024611

Pay

Safety-Kleen

1000 North Randall Road
Elgin, Illinois 60123-7857

70-2382
719

93341

TWO HUNDRED FIFTY AND NO/100 DOLLARS * DATE 06 07 96 **********250.00

To The Order Of
FLORIDA DEPT OF ENVIRO PROT
1900 S CONGRESS AVE STE A
PO BOX 15425
WEST PALM BEACH FL 33416

The Northern Trust Company
Payable Through Northern Trust Bank Du Page

SAFETY - KLEEN CORP.
AUTHORIZED SIGNATURE
Robert W Williamson

NOT VALID OVER $20,000

```
 AREA: SED_______             Cash Receiving Application                           CRAF006A
                           Collection Point Log Remittance        Tot: ________$250.00
+----------------------------------------------------------------------------------------+
| SYS$REMT: 119544__  Type: CP___     Recved Date: 05-JUL-1996  Status: RECEIVED         |
| SYS$RCPT: 93341___  PNR: ________  Check #: 1024611___   Amount: ________250.00        |
| SSN/FEI#: _________                  Name: SAFETY_KLEEN__________________              |
|    First: ____________________   Middle: _____   Title:________   Suf: _____           |
| Address1: ________________________________________  Short Comments:                    |
| Address2: 1000_NORTH_RANDALL_ROAD_________________ SAFETY-KLEEN/MEDLEY______           |
|     City: ELGIN_______________   ST: IL  Zip: 60123-7857 Country: __________           |
+----------------------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <------------------------------------------+
|         Distr                                                                    S     |
|         CL      Object                        Payment                  Applic/   T     |
|SYS$PAYT Area.. Code/Description.....: Amount........ Reference#     Fund  A      |
|123473__ SED___ 002234 HAZAR/WASTE-OPE _______$250.00 HO13291651 ___  PFTF__ CO     |
|________ ______ ______ _______________ ______________ __________ ___  ______ __     |
|________ ______ ______ _______________ ______________ __________ ___  ______ __     |
|________ ______ ______ _______________ ______________ __________ ___  ______ __     |
|________ ______ ______ _______________ ______________ __________ ___  ______ __     |
+----------------------------------------------------------------------------------------+
 COMMIT FREQUENTLY                     ________$250.00  Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____________________________
Count: *1                                                                   <Replace>
```

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 14, 1996

H013-291651

Denis M. Padovani
Safety-Kleen Corp (Medley)
1000 N. Randall Rd.
Elgin, IL 60123-7857

The Florida Department of Environmental Protection has reviewed your application for registration as a transporter and/or registered storage facility for mercury-containing lamps and devices destined for recycling. Based on the information received, the facility at 8755 NW 95 St. , Medley has been registered with the following status:

Facility ID # FLD984171694

Transporter of Mercury Containing Lamps
Storage Facility for Mercury Containing Lamps
(2000 Kg (Lamps) / 100 Kg. (Devices) for 180 Days

This registration is valid through March 1, 1997. The registration form for 1997 will be sent to the contact person for your facility.

Chapter 62-737, Florida Administrative Code (F.A.C.), specifies several other requirements including packaging, training, shipping papers and record keeping for transporters and registered storage facilities handling lamps or devices destined for recycling. These requirements are simple, flexible and make good business and environmental sense. They are found in Sections 500, 700, 710, and 720 of Chapter 62-737, F.A.C. (enclosed).

This registration does not allow you to transport or store mercury-containing lamps or devices which are destined for landfill disposal. The transportation or storage of mercury-containing lamps or devices destined for landfill disposal is subject to our hazardous waste management regulations.

If any of the information for your facility on the Mercury-Containing Lamp and Device Transporter and Storage Facility Registration Form changes, please notify Mr. Jack Price in writing at the letterhead address at (MS 4555) above. For further assistance, please call him at (904) 488-0300.

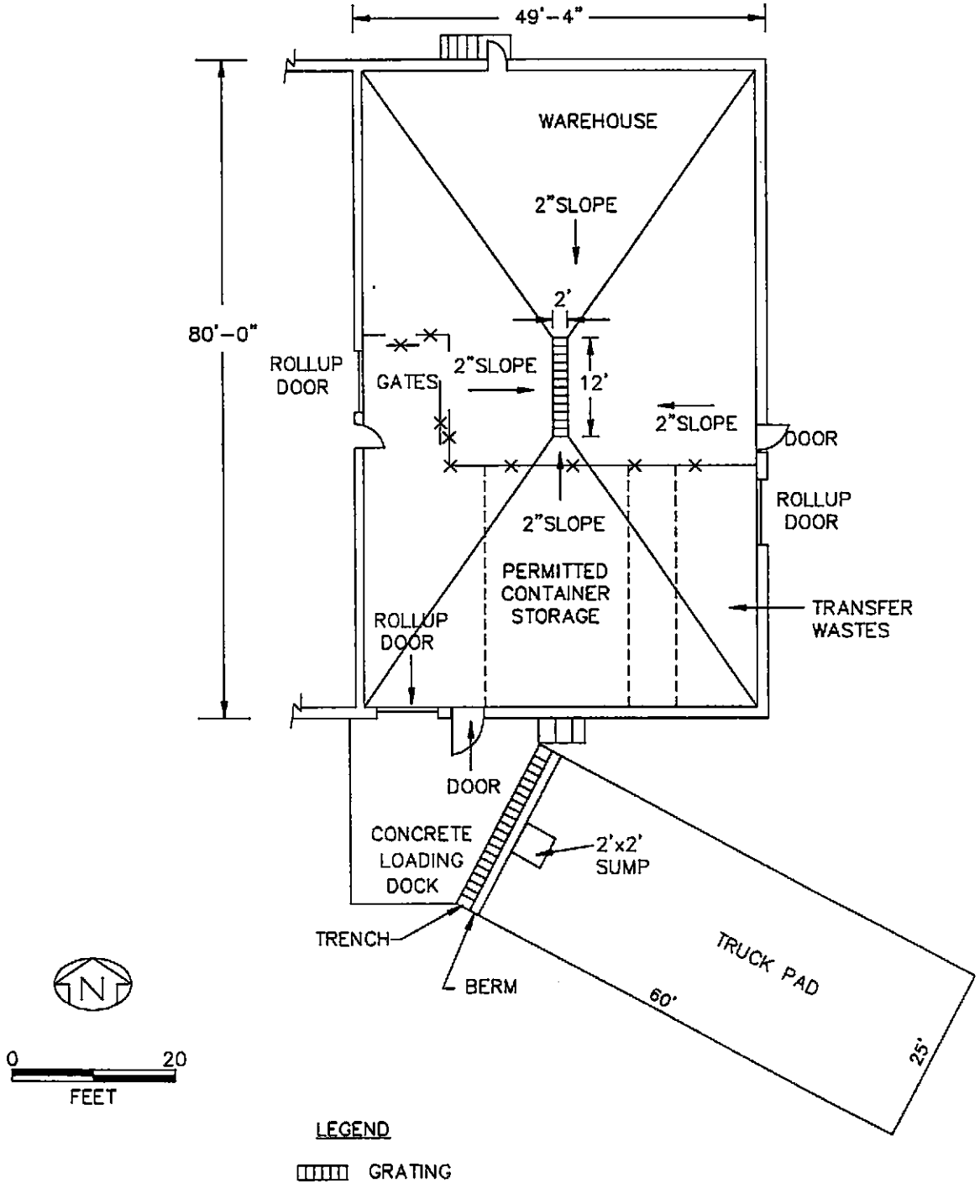
Sincerely,

David H. Kelley

David H. Kelley, Environmental Manager
Hazardous Waste Management Section

Enclosure

Figure II.B.1-1
Container Storage Area
Safety-Kleen Corp. Facility
Medley, Florida



The ERM Group ®

Florida Department of
Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

FEB 14 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dade County
HW-Safety-Kleen Corp., Medley

Mr. William C. Crawford
Field Environmental
Safety-Kleen Corporation
129 South Kentucky Ave., Suite 701
Lakeland, Florida 33801

Re: Request for Modification of Hazardous Waste Operating Permit
Safety-Kleen/Medley, HO 13-216311 (Submitted on January 28, 1994)

Dear Mr. Crawford:

The Department has reviewed your request for modification, as referenced. The environmental piping schematic you have attached has also been considered. Based upon the information provided the Department is approving the following Class I, minor modification:

* Safety-Kleen may relocate the spent solvent pump to below grating. The environmental piping schematic (SC-DWG Number GDPB200) has been changed to delete the words "above grating" which were associated with the spent solvent pump, (pump number 13). The revised schematic replaces the original version. The revised schematic has been placed both in the facility file and in attachment II.S.1, Equipment, of the permit application.

This letter must be attached to the original permit and become part of the Permit.

A person whose substantial interests are affected by this modification may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Modification. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

FEB 1 4 1994

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) a statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) a statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) a statement of the material facts disputed by Petitioner, if any;
(e) a statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) a statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) a statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this modification. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C. This modification is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this modification will not be effective until further Order of the Department.

When the Order (Modification) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate

FEB 1 4 1994

District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Should you have any questions, please contact Denise Richburg or Knox McKee of this office, telephone 407/433-2650.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Mary F.S. Williams
Director of District Management

JKM

Copies furnished to:

Satish Kastury, DEP/Tallahassee
Alan Farmer, EPA/Atlanta
File/Report Coordinator

CERTIFICATE OF SERVICE

This is to certify that this **NOTICE OF PERMIT MODIFICATION** and all copies were mailed before the close of business on 2/14/94 to the listed persons.
Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Deidre Miles (Clerk) 2/14/94 (Date)

safety-kleen.

HO 13-267874

March 13, 1995

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

RE: Operating Permit Modifications, Safety-Kleen Corp., Medley, Florida; FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. (Safety-Kleen) has reviewed its current operations and determined that it is appropriate to manage nonhazardous spent ethylene glycol by commingling with used oil. Under hazardous conditions, the spent ethylene glycol may be handled in containers. The waste stream of spent ethylene glycol will no longer be accumulated and stored in the 20,000-gallon tank. The appropriate pages of the permit application have been revised to reflect managing this waste stream as described above.

The tank was permitted to hold spent ethylene glycol but never held any waste product. Currently, a small amount of water from the hydrostatic testing procedure exists in the tank. Per discussions between you and Jon Ercole, no decontamination of the tank is required. The tank will be designated as a 20,000-gallon product tank.

Updates to the emergency contact list have also been made and are included herein.

Table 1 provides instructions for updating the permit application. Two copies of the replacement pages are enclosed. Additional copies are being provided under separate cover to FDEP Tallahassee and Environmental Protection Agency (EPA) Region IV. Also enclosed is the required $500 modification fee.

If you have any questions or comments, please do not hesitate to contact Jon Ercole at (407) 734-2560.

Sincerely,

Al Seyfer
Regional Sales Manager

pjh/bai

Enclosure(s)

13112.21/01/KM031395.LTR/2

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

c: Jeffrey Grill - ERM
Cynthia Norton - ERM (letter only)

Chief, Waste Management Division
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Environmental Administrator
Hazardous Waste Regulation Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

TABLE 1
INSTRUCTIONS FOR UPDATING THE
OPERATING PERMIT APPLICATION
MEDLEY, FLORIDA
FLD 984171694

Replace the following pages:

I.B.3-1
Figure I.B.3-1
I.D.2-5
I.D.3-1A
Figure II.A.1(a)-4
II.A.1(c)-1
Figure II.A.1(c)-1
II.A.4(b)iii
II.A.4(b)-1
II.A.4(b)-2
II.A.4(b)-3A
Figure II.A.4(b)-5
II.A.5-3
II.A.5-7
II.A.6-7
II.A.6-8
II.A.6-9A
II.A.6-9B
II.A.6-9C
II.A.6-9D
II.B.3-1
II.C.1-1
II.C.2 (Replace all text pages)
Figure II.C.2-1
Figure II.C.7-1
II.C.9-1
II.C.9-2
II.K.1-1
II.K.1-2
Attachment II.K.1 - Closure Cost Estimate Pages 1, 2, 3, and 6
II.S.1-1
Figure - Attachment II.S.1 - Safety-Kleen Environmental Piping Schematic - Existing

This is to certify that the modifications incorporated on this list have been examined by me and found to conform to engineering principles applicable to such facilities.

Robert W. Fox

Robert W. Fox, P.E. 3/13/95
License No. 40980

ATTACHMENT I.B.3
FACILITY LAYOUT AND PHOTOGRAPHS

The service center (i.e., facility) layout and traffic patterns are illustrated in Figure I.B.3-1.

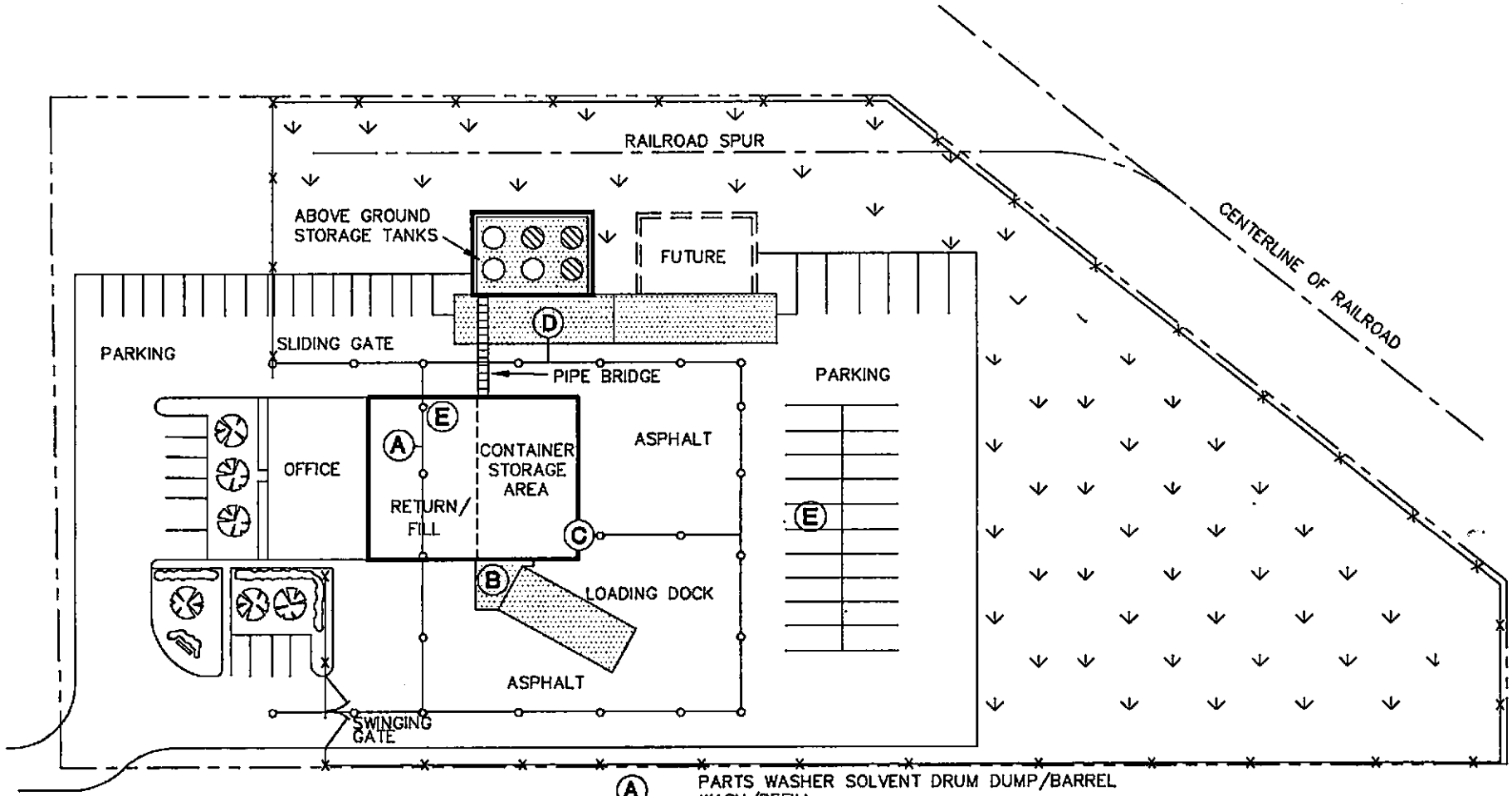
The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area 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 aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

U.S. 27, Okeechobee Road, 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 heavy 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. Traffic from this facility will have a minor impact on local traffic conditions.

Photographs which depict the hazardous waste management units, security features, and general layout of the facility are provided.

13112.21/31121LUL/031093-10

Figure I.B.3-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

(A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL

(B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS

(C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS

(D) LOADING & UNLOADING OF PARTS WASHER SOLVENT

(E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL

NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER

N

0 80

FEET

REVISED 03/06/96

FRM

center for processing. The filters from the Actrel® system will contain approximately the same constituents as dumpster mud.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container storage warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen recycle center.

Safety-Kleen also collects used oil filters and oily water. These materials are generally not hazardous wastes. The used oil and oily water may be managed in either drums or bulk tanks.

TABLE I.D.3-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula) IC609	S01****	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula) IC699	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01**	350	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Non-perchloroethylene)	S01****	Included Above	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

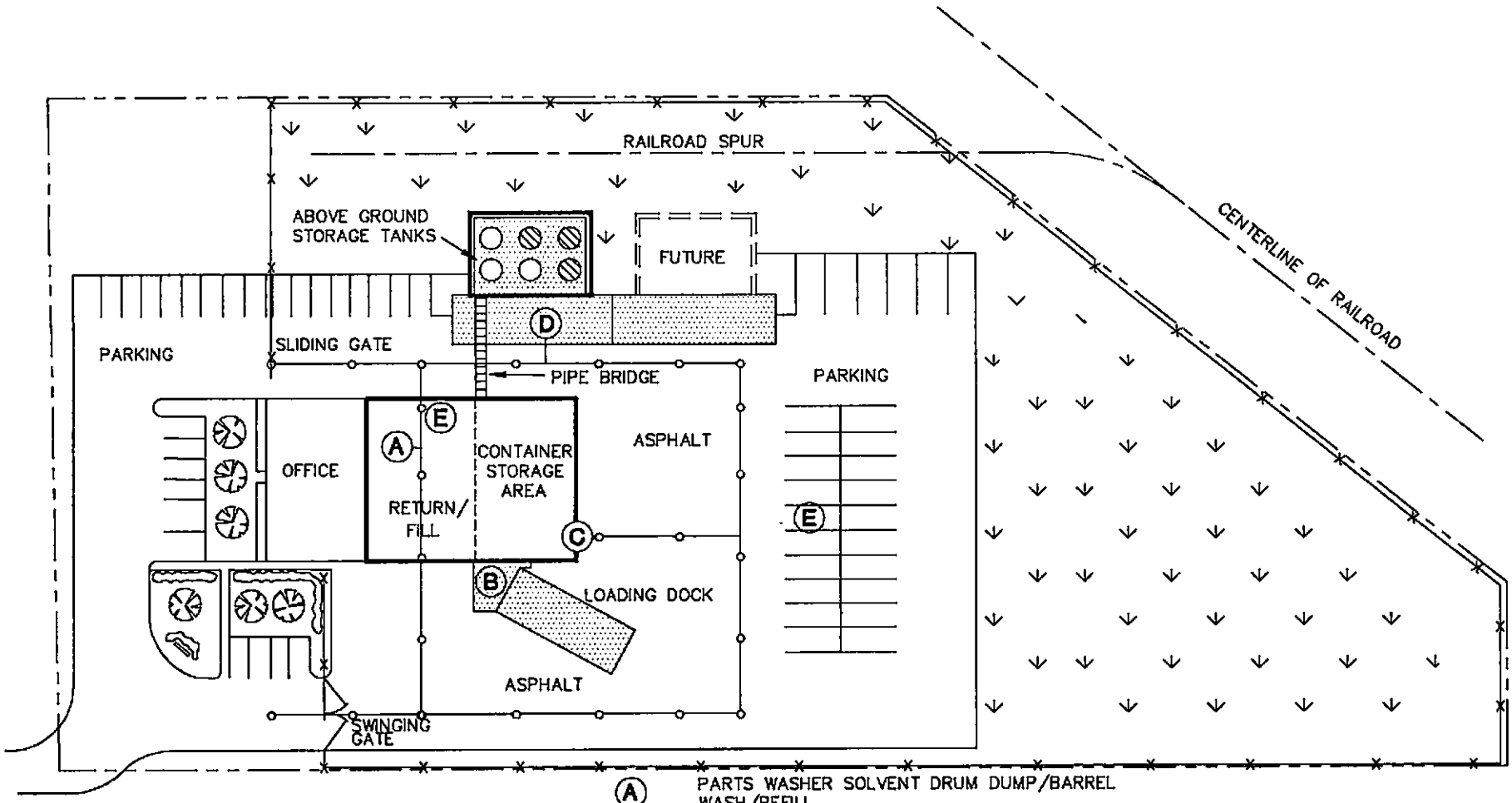
* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** These wastes are transfer wastes.

Figure II.A.1(a)-4
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

(A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL

(B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS

(C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS

(D) LOADING & UNLOADING OF PARTS WASHER SOLVENT

(E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL

NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER

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ATTACHMENT II.A.1(c)
TRAFFIC INFORMATION

The service center (i.e., facility) layout and traffic patterns are illustrated in Figure II.A.1(c)-1.

The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area vans and trucks. The trucks dispatched from the recycle.center to deliver fresh parts washer solvent and pick up used parts washer solvent will perform these activities at the aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

U.S. 27, Okeechobee Road, 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 heavy 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. Traffic from this facility will have a minor impact on local traffic conditions.

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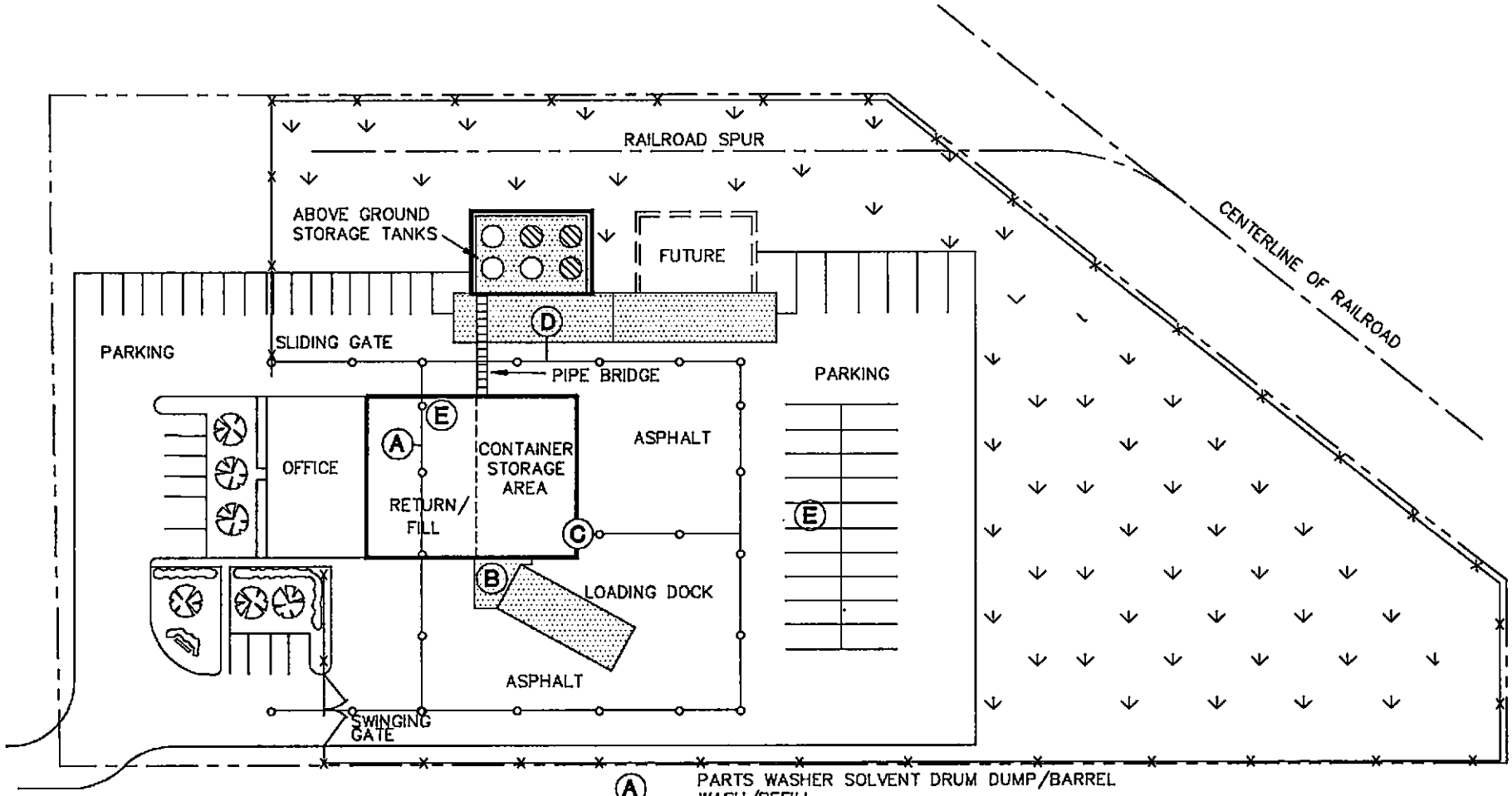
Figure II.A.1(c)-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

(A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL

(B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS

(C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS

(D) LOADING & UNLOADING OF PARTS WASHER SOLVENT

(E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL

NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER

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EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary:
Juan Formoso
9440 SW 55th Street
Miami, FL 33165
Home: (305) 595-8290
Office: (305) 884-0123
Beeper: (305) 737-4482

Alternate:
Peter Ciocia
1909 NW 89th Terrace
Coral Springs, FL 33071
Home: (305) 341-4018
Office: (305) 884-0123
Beeper: (305) 827-1932

Emergency Notification Phone Numbers

Safety-Kleen Environment, Health and Safety Department
Telephone (708) 888-4660 (24-hour number)

National Response Center, Telephone (800) 424-8802

FDEP Southeast District, 1900 South Congress Avenue, West Palm Beach, FL 33406
Telephone (407) 433-2650 (Monday - Friday, 8 a.m. - 5 p.m., except holidays).
At all other times call the Florida Department of Emergency Management

Florida Department of Emergency Management
Telephone (904) 488-1320 (during non-FDER-SE business hours)

Dade County Environmental Resources Management, Mr. Mike Graham
Telephone (305) 375-3376 (24-hour)

Emergency Team to be Notified

Metro Dade Fire Department
8175 NW 12th Street
Miami, FL 33126
(305) 470-1760 or 911

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
(305) 887-9541 or 911

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

O.H. Materials Company
P.O. Box 551
Findlay, OH 45839-0551
(800) 537-9540
(Primary Cleanup Contractor)

Ryckman's Emergency Action and
Consulting Team
2208 Welsch Industrial Court
St. Louis, MO 63146
(800) 325-1398
(Secondary Cleanup Contractor)

ATTACHMENT II.A.4(b)

PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS SAFETY-KLEEN CORP., MEDLEY, FLORIDA

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to 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 with the procedures contained in this plan.

General Description of Activities

The business activities conducted at the Medley Service Center 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 service center, where separate storage tanks are utilized for the storage of clean and used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®). There is one 20,000-gallon clean solvent storage tank and one 20,000-gallon product tank at this time. These tanks may store any of the clean parts washer solvents (Parts Cleaner 105, Premium Solvent, or Actrel®). Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, used parts washer solvent sludge, antifreeze, paint waste, fluid recovery service (FRS) wastes, dry cleaning wastes (chlorinated solvent), and used oil. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are utilized for the management of containers whose integrity has been compromised.

The parts washer solvents are transported in covered containers between the service center and customers. Upon returning to the service center, the used parts washer solvents (Parts Cleaner 105, Premium Solvent, and Actrel®) are transferred from the containers into a wet dumpster/ barrel washer (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent (Parts Cleaner 105,

Premium Solvent, and Actrel®) from the wet dumpster flows into a 20,000-gallon aboveground tank for storage. Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is cleaned out at least once per working day, containerized in satellite accumulation drums next to the wet dumpster units, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation. Satellite accumulation of parts washer solvent occurs in the return/fill area. These satellite accumulation points are associated with the operation of the dumpsters.

The immersion cleaner remains in covered containers at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility. Immersion Cleaner #609 is managed as a transfer waste and may be stored onsite for up to 10 days.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. The still bottoms, powder residue, and filters are packaged on the customer's premises in containers. All containers are DOT-approved. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The antifreeze waste is approximately two-thirds water and one-third antifreeze (ethylene glycol) and contaminants. These wastes are deposited into a carboy by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck by a Safety-Kleen sales representative. At the service center, the tanker truck may transfer its waste to another tanker truck. Tanker truck to tanker truck transfers of waste antifreeze are conducted at the return/fill shelter or on any asphalt or concrete surface. Hazardous spent antifreeze is handled in containers. The containerized waste is placed in the container storage area prior to shipment to a reclamation facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes),

TABLE II.A.4(b)-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula)	S01**	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula)	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste	S01**	271	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

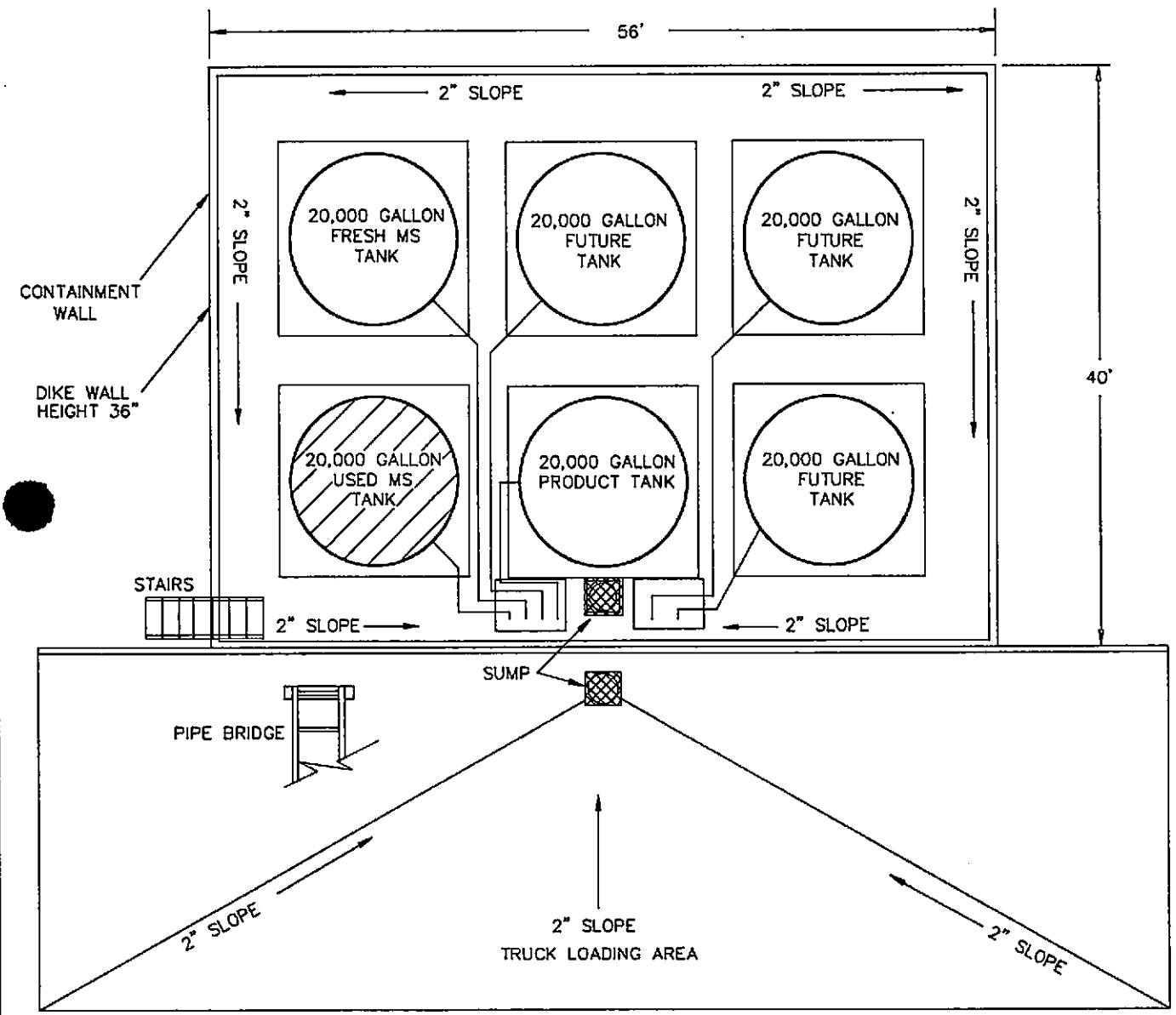
* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** FRS wastes are transfer wastes only.

Figure II.A.4(b)-5
Tank Farm
Safety-Kleen Corp. Facility
Medley, Florida



NOTE: ENTIRE AREA IS CONCRETE

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6. Antifreeze waste is approximately two-thirds water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the container storage area for spent antifreeze will be permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

7. Paint wastes will consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds (D001, F003, and F005) and is a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste will be collected in containers at the customer's place of business and the containers will then be palletized whenever possible and stored in the paint waste storage area of the accumulation center.

8. Due to the great variability in the composition of Fluid Recovery Service (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. The FRS wastes are handled as transfer wastes only.

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

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.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into a carboy or containers by the customer, on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen Recycle Center.

PAINT WASTES

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FLUID RECOVERY SERVICE WASTES

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. These wastes are handled as transfer wastes at the service center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.

2. Lubricating, hydraulic oils, and machine oils.

3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.

Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in five-gallon pails. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7.5 gallons of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into a right hand pail. The tube in the left hand pail extends exactly half way into the pail (i.e., to the 2.5 gallon mark). The left hand pail starts with five gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail contains 7.5 gallons of solvent. Any solvent above 7.5 gallons remaining in the left hand pail at the time of servicing will be pumped through the machine into the right hand pail by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand pail will always contain five gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two pails or there is an overfill from the right hand pail, the waste will 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 service representative will insert a three-foot-long glass tube into the container. The tube should glide easily down to the bottom of the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the three-foot tube (the water and paint will separate in the tube and thus can be measured), the waste will be rejected.

Antifreeze Waste

Spent antifreeze is collected in carboys or containers at a customer's place of business until it is picked up by Safety-Kleen. Nonhazardous spent antifreeze is pumped into a tanker truck;

and hazardous spent antifreeze is handled in containers. Prior to transferring the spent antifreeze into the tanker truck or container, the Safety-Kleen service representative is responsible for visually inspecting the waste. Spent antifreeze is typically yellowish green to blue in color with traces of orange, red, or black discoloration due to ferric oxide (i.e., rust). A slight sheen may be present on the surface of the spent antifreeze due to the presence of oils or other petroleum products. Sediment (brownish or black) may collect in the carboy due to particulate matter from vehicle engines, rust, dirt, or other matter.

If the spent antifreeze does not meet the criteria described above, the Safety-Kleen service representative may collect a sample of the waste for analysis or request that the customer analyze the waste.

ONSITE ENVIRONMENTAL ACTIVITY REVIEW PROGRAM

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customer's wastes (particularly the last 10 years) reflect that there has, in fact, been a continuing reduction in the trace levels of characteristically toxic constituents in these wastes. Therefore, in concert with the sampling described in this waste analysis plan, Safety-Kleen may conduct reviews of customer's waste streams. This review, in addition to the analytical baseline of information, will confirm that the hazardous waste streams managed at the Service Centers under conditions of the Part B Permit do not change from year to year. Annual process descriptions may be performed for Large Quantity Generators (LQGs) and Small Quantity Generators (SQGs) that generate these wastes.

If a review occurs, it will be performed at the customer's site by the Safety-Kleen sales representative during their regular service calls. The Safety-Kleen representative will meet with a customer representative who is knowledgeable of the Safety-Kleen services used at the facility. The Safety-Kleen representative will conduct an inspection of the facility and interview the customer. The inspection and interview will be used to generate: a description of the customer's processes, an inventory of waste streams, the principal product(s) or service(s), and the purpose for which Safety-Kleen solvents are used. This information will be used to complete a review document which will be certified and signed by the customer's representative and the Safety-Kleen representative. A copy of the completed review document will be kept on file at the Service Center and copy will be provided to the customer.

TABLE II.A.6-1
PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION

	Hazardous Waste	Parameter[a]	Rationale
1.	Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
2.	Used Parts Washer Solvent	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
3.	Parts Washer Solvent 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)
4.	Parts Washer Solvent 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)
5.	Dry Cleaning Wastes	Perchloroethylene TCLP	Contain ingredient of F002 or contains a hazardous constituent. Perchloroethylene formula is the only waste managed as a permitted waste.
6.	Paint Wastes	Toluene, Xylene, Methyl ethyl ketone, Methyl isobutyl ketone, Acetone, Isopropanol, Methanol, Ethanol, Normal butyl acetate, Isobutyl acetate, Cadmium, Chromium, Lead	Contains these components: F003, F005, D001, D006, D007, and D008
7.	Hazardous Spent Antifreeze	TCLP	May contain these compounds

FOOTNOTE:

[a] TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.

TABLE II.A.6-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	EPA 9045/SK9906
Flash Point	Tag closed cup tester	EPA 1030/SK9401
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
Specific Gravity	Meter	ASTM D 891/SK9903

TABLE II.A.6-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Immersion Cleaner (699IC)	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 Parts Washer Solvent	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanks–Bomb sampler (similar to weighted bottle sampler)
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Same as 2	Same as 2	Same as 2
4. Parts Washer Solvent Dumpster Mud	Same as 1	Same as 1	Same as 1
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
6. Paint Wastes	Same as 1	Same as 1	Same as 1
7. Hazardous Spent Antifreeze	Same as 1 or 2	Same as 1 or 2	Same as 1 or 2

TABLE II.A.6-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency[a]
1. Used Immersion Cleaner 699	Gas chromatograph annually TCLP annually
2. Used Parts Washer Solvent	Gas chromatograph annually Flash point annually TCLP annually
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP annually
4. Parts Washer Solvent Dumpster Mud	Gas chromatograph annually TCLP annually
5. Dry Cleaning Wastes	Gas chromatograph annually TCLP annually
6. Paint Wastes	Gas chromatograph annually TCLP annually
7. Hazardous Spent Antifreeze	Gas chromatograph annually TCLP annually

[a] 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.

ATTACHMENT II.B.3
WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials to be handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. However, they are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and fresh solvents is a standard practice at the facility.

All materials are managed in accordance with the local fire protection code and fire department requirements. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are used for the management of containers whose integrity has been compromised.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle center. Immersion Cleaner #609 is managed as a transfer waste.

The dry cleaning wastes are contained in containers. All containers are DOT-approved. These containers are managed similarly to the used immersion cleaner containers and contents within the containers are not removed or processed at the facility. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The parts washer solvents are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. Hazardous spent antifreeze is packaged in containers, and the containers are not opened at the facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are palletized and stored in the container storage area of the warehouse.

ATTACHMENT II.C.1

ENGINEERING ASSESSMENT OF TANK SYSTEM

An engineering assessment of the tank system has been prepared and is included herein. This assessment includes an evaluation of the structural integrity and suitability of the tank system for handling hazardous waste as required under 40 CFR 264.191 and 264.192.

The facility has undergone minor modifications in the recent past which no longer conform to the drawings and figures in this report. These minor modifications have not affected the tank volumes, system integrity, or secondary capacity of the tank system. For a current figure of the facility layout and tank farm, refer to figures I.B.3-1 and II.C.2-1.

ATTACHMENT II.C.2
TANK SYSTEM SPECIFICATIONS

The facility includes the capacity for six aboveground steel tanks (Figure II.C.2-1). Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) contained in containers returned from the customers are transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent (Parts Washer 105 or Premium Solvent) product tank and one 20,000-gallon product tank. The remaining three tanks are intended for future installation. The two product tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

Parts washer solvent and ethylene glycol are compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent consist primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with C_{12} - C_{14} chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvents have a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

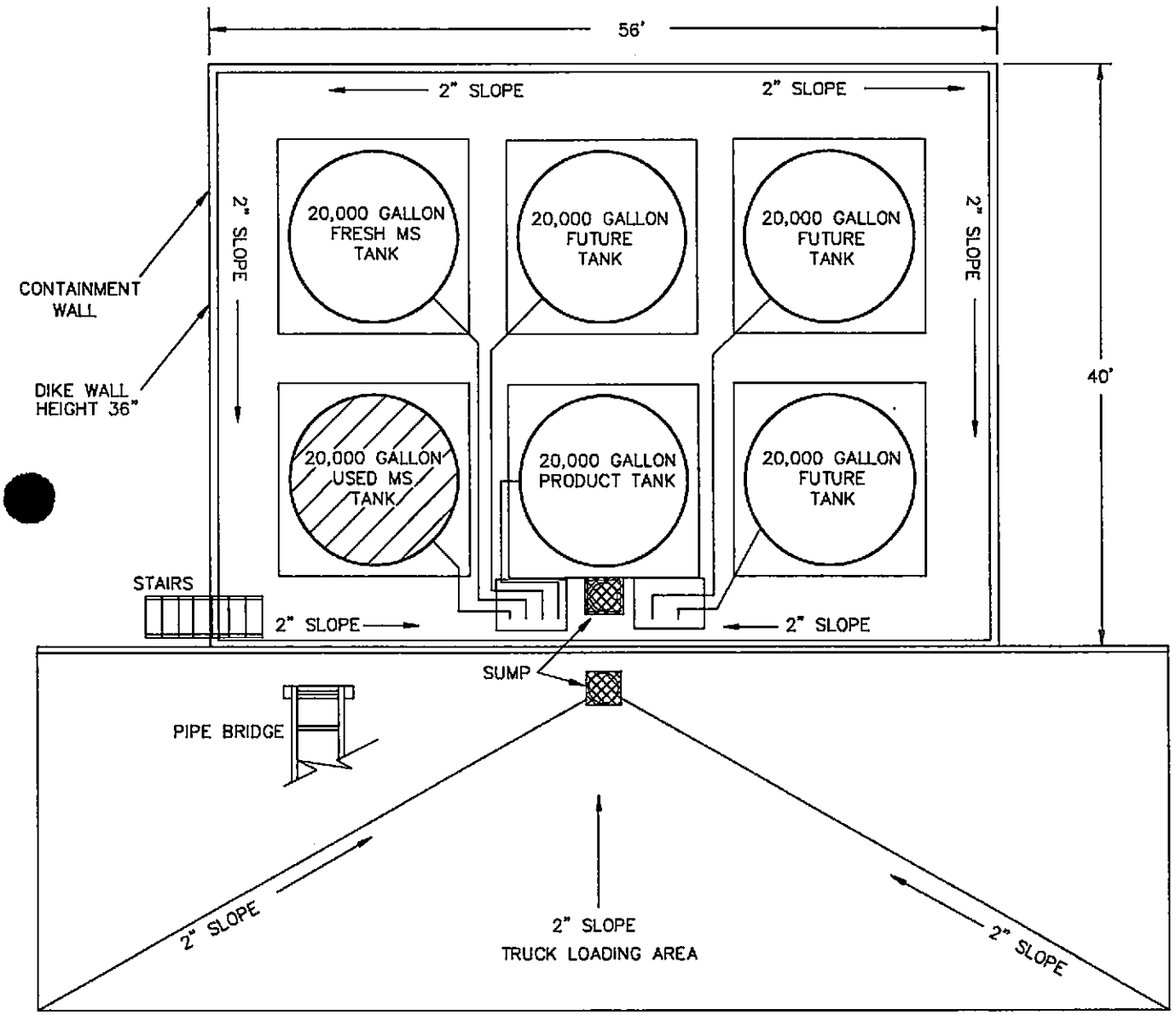
OPERATION PROCEDURES

Parts Washer Solvent

Spent parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill shelter. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster are pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

The barrel washers are located within the parts washer solvent return and fill shelters. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washers.

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



NOTE: ENTIRE AREA IS CONCRETE

REVISED 03/06/95

13112.21/31121TF/071392-8

ERM

Used solvent is returned from customers via containers and poured into the barrel washers. The container is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the container to clean the inside of the barrel. The machine is turned off and the container removed. The procedure takes approximately five seconds per container. The container is then refilled using a pump and nozzle (Figure II.C.2-3(a)) similar to a gasoline pump. The waste is transferred to the tanks via piping and a pump (Figure II.C.2-3(b)).

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used parts washer solvent storage tank. There is a basket in the sump that collects sludge. At least once each working day, this basket is removed and sludge removed and placed into a sludge container. Each dumpster has four satellite accumulation containers. These containers are labeled as "Waste Sludge," "Glass/Metal," and "Rags/Absorbents." The Actrel® filters may be placed in the waste sludge container. The containers remain covered except when wastes are being added. Once full the containers are moved into the container storage area for later shipment to a Safety-Kleen recycle center for disposal or recycling. In addition to the sludge containers there is also one satellite accumulation container (approximately five gallons) connected to the drain pan which is in front of each barrel washer. These containers collect any spillage which fall into the drain pans. These containers are periodically emptied into the barrel washers in order to add the waste parts washer solvent to the bulk waste parts washer solvent tank.

Ethylene Glycol

Spent ethylene glycol is collected from customers in either containers or in tanker trucks. If the spent ethylene glycol is hazardous, it arrives at the service center in containers, then it is placed into the container storage area. If the spent ethylene glycol is nonhazardous, it arrives at the service center via tanker truck, then it may be transferred from tanker truck to tanker truck.

TANK DESIGN

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are shown in

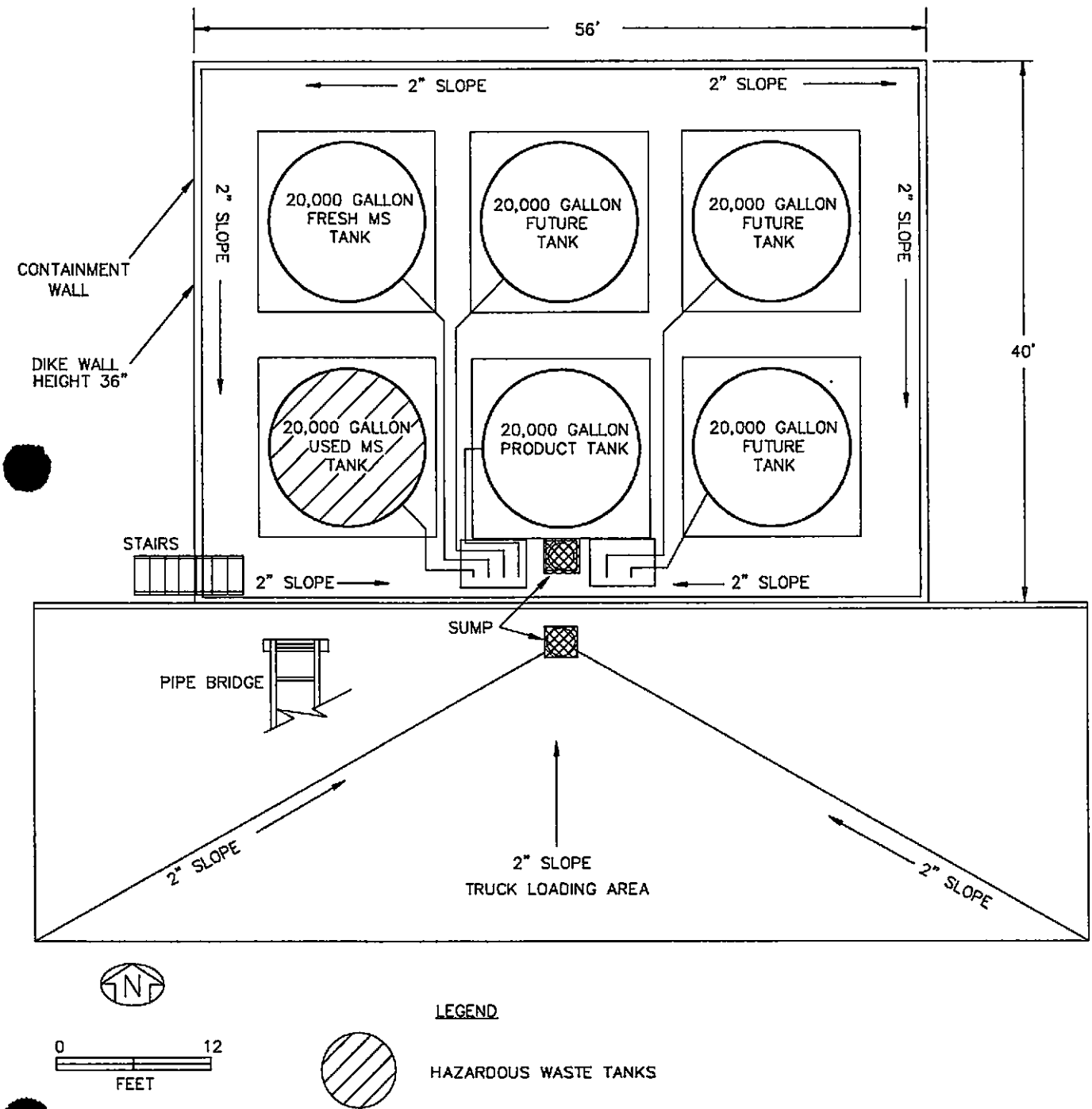
Figures II.C.2-4(a) and II.C.2-4(c). While this figure shows a parts washer solvent tank, the same design and installation specifications apply to the spent ethylene glycol tank. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. A sample design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(f). The exact brand of tank alarm equipment used is equivalent to those shown in Figures II.C.2-5(a) through II.C.2-5(f). The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer) in accordance with Underwriters Laboratories standards. All tanks are new and unused.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. The roof will extend over the tanker loading area. Therefore, no surface run-on is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters.

The tank farm dike and the return/fill shelter are sealed with a chemical resistant coating (Semstone 140). Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use are at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or tank. A tank truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill shelter is cleaned within 24 hours of a spill.

"No smoking" signs are posted at the tank farm and return/fill shelter.

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



NOTE: ENTIRE AREA IS CONCRETE

REVISED 03/06/95

13112.21/31121TF/071392-8

ERM

ATTACHMENT II.C.9
CONTROLS AND SPILL PREVENTION

The facility includes the capacity for six aboveground steel tanks. Used parts washer solvent housed in containers returned from the customers is transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent product tank, and one 20,000-gallon product tank. The remaining three tanks are intended for future installation.

Parts washer solvent is compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent are comprised primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with C_{12} - C_{14} chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvent has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

Spent parts washer solvent from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill station. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

The barrel washers are located within the return and fill shelter. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washer. The barrel washer is a totally enclosed unit.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high level-alarms.

Attachment II.C.1 provides an independent assessment of the tank system performed upon completion of construction. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. Therefore, no surface run-on or precipitation is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters. The tank farm dike is sealed with a chemical resistant coating (Semstone 140). Semstone 140 or equivalent will be used for all future repairs or recoating of this area. Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use is at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or the tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill.

ATTACHMENT II.K.1
CLOSURE PLAN

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. Based on current business and projected facility conditions, this facility is expected to remain in operation until the year of 2025.

In the event that some presently unforeseen circumstance(s) results in the discontinuance of operations and permanent closure or sale of the facility, the following closure plan is designed to identify the steps necessary to completely close the facility at any point during its intended life, and should be used for tanks, container storage area, and equipment.

It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment, in order to eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment.

Procedures described in this closure plan are also applicable to cleaning up of spills and repairing/decontamination of the facility or equipment.

An anticipated closure schedule is presented in Figure II.K.1-1. At the present time, a closure permit is required to close the facility. An anticipated maximum waste inventory for the container storage portion of the facility is presented in the following section.

FACILITY DATA

Aboveground Storage Tanks: The 20,000-gallon vertical carbon steel waste parts washer solvent tank is in a 36-inch high concrete containment area.

Container Storage Areas

The container storage area is an area with a sloped floor and collection trench. The maximum volume of product and waste stored is 29,400 gallons, with 6,912 gallons as containers of waste dry cleaner, spent immersion cleaner, parts washer solvent dumpster mud, FRS wastes, spent antifreeze, and/or paint waste.

Return/Fill Shelter: The return/fill shelter is an approximate 54' 5" x 80' 0" structure between the two halves of the building. It contains four dumpsters which facilitate the flow of solvent to the tank. These dumpsters are not intended for storage, but can hold a maximum of 2,016 gallons (504 gallons each).

MAXIMUM INVENTORY OF WASTE

The maximum amount of waste parts washer solvent in the tank is 20,000 gallons.

The maximum amount of containerized waste is 6,912 gallons of waste. This amount includes any combination of five-gallon containers, 15-gallon containers (also known as split 30- or 20-gallon), 16-gallon containers, 30-gallon containers, 55-gallon containers, and/or 85-gallon overpacks.

The maximum amount of solvent waste in the dumpsters is 2,016 gallons (four 504-gallon dumpsters).

CLOSURE PROCEDURE

PHASE I--OPEN THE TANK

- Access to aboveground tanks is obtained by draining the products, de-gassing, and removing man-ways.

- Prior to opening the tanks, the personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they will be provided with

MEDLEY, FLORIDA SERVICE CENTER
CLOSURE COST ESTIMATE

1. TANK CLOSURE - Open, remove contents of, clean, remove, and dispose of one 20,000-gallon aboveground storage tank.

   Phase II - Remove Contents and Clean

   a. Ship contents to a reclaimer (approximately 19,000 gallons @ 95% capacity)

      Crew:

4 truck drivers @ \$17.56/hr. x 8 hrs.	\$ 561.92
1 20,000-gallon tanks x 95% = 19,000 gal. 19,000 ÷ 5,000 gal/truck = 4 trucks	
4 trucks x 80 miles x 1.75/loaded mile	\$ 560.00
Reclamation cost (\$0.30/gal. x 19,000 gal.)	\$ 5,700.00

   b. Clean tanks

      Crew:

1 foreman @ \$18.30/hr. x 12 hrs.	\$ 219.60
2 laborers (\$17.00/hr. & \$3.00/hr. hazard pay) x 12 hrs.	\$ 480.00

   c. Pressure washer (1 day @ \$400/day) \$ 400.00

   d. Disposal and transportation of wash water (2,000 gal. @ \$0.50/gal.) \$ 1,000.00

   e. Transportation of wastewater (1,250 miles x \$1.75/loaded mile) \$ 2,187.50

   f. Analysis of 1 rinsate sample \$ 200.00

   TOTAL PHASE I **\$11,309.02**

Phase III - Remove and Dispose of Tanks

a. Disconnect and remove appurtenant equipment

Crew:

1 foreman @ $18.30/hr x 4 hrs.		$ 73.20
4 laborers @ $17.00/hr x 4 hrs.		$ 272.00

b. Remove tank

Crew:

1 foreman	$18.30/hr. x 4 hrs.	$ 73.20
4 laborers	$16.80/hr. x 4 hrs.	$ 268.80
1 backhoe	$250/day x 1 day	$ 250.00
1 crane w/operator	$500/day x 1 day	$ 500.00

c. Decontaminate and remove secondary containment system

Crew:

1 foreman	$18.30/hr. x 24 hrs.	$ 439.20
3 laborers	$16.80/hr. x 24 hrs.	$ 1,209.60
1 backhoe	$250/day x 2 days	$ 500.00
1 jackhammer	$150/day x 2 days	$ 300.00
1 pressure washer	$200/day x 1 day	$ 200.00
Test rinsate	(2 @ $200 each)	$ 400.00
Remove and dispose of rinsate	$0.50/gal. x 1,000 gal.	$ 500.00
Remove and dispose of concrete	$50/ton x 70 tons	$ 3,500.00
	TOTAL PHASE III	**$ 8,486.00**

Phase IV - Backfilling, Regrading, Soil Testing

a. Tests for soil contamination (1 per tank, 1 per pipe system)

2 samples x $640.00/each		$ 1,280.00

b. Test backfill material (1 sample @ $320) $ 320.00

c. Regrading

Crew:

1 foreman	$18.30/hr. x 4 hrs.	$ 73.20
1 laborer	$16.80/hr. x 4 hrs.	$ 67.20
Front-end loader	$350/day x 1 day	$ 350.00
Backfill (assume 10 CY required)	$10/CY x 10 CY	$ 100.00
	TOTAL PHASE IV	**$ 2,190.40**

Summary of Closure Costs for 2 20,000-Gallon Tanks

Phase II	$11,309.02
Phase III	$ 8,486.00
Phase IV	$ 2,190.40
TOTAL	**$21,985.42**

5. PROFESSIONAL ENGINEER CERTIFICATION	$ 1,200.00
6. TOTAL CLOSURE COSTS	
One 20,000-Gallon Tank	$21,985.42
Container Storage Area	$ 8,544.44
Return/Fill Shelter	$ 8,893.60
Professional Engineer Certification	$ 1,200.00
TOTAL	**$40,623.46**

NOTE: These estimates are based on third-party costs.

ATTACHMENT II.S.1
EQUIPMENT

The following information is required under 40 Code of Federal Regulations (CFR) Section 270.25 for each piece of equipment which Subpart BB of Part 264 applies:

1. Equipment associated with the 20,000-gallon used parts washer solvent tank.

2. A site plan identifying the hazardous waste management unit at the facility is enclosed. Also enclosed are complete equipment inventory forms listing each piece of regulated equipment.

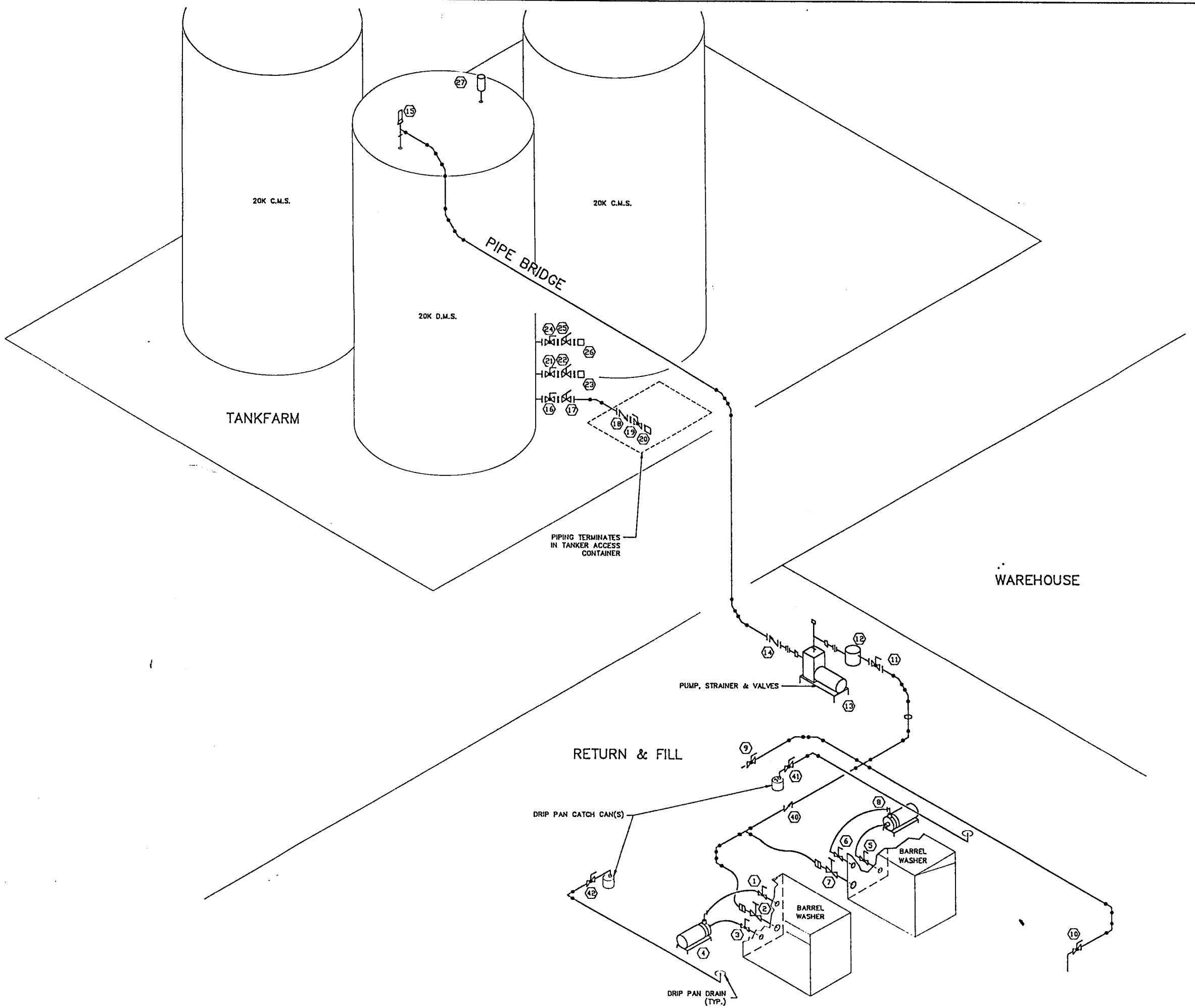
3. Types of equipment include pumps, flanges, and valves.

4. The hazardous waste stream is spent parts washer solvent, which can be considered to contain organics.

5. The hazardous waste state of parts washer solvent is liquid.

6. The equipment is considered to be heavy liquid service (mineral spirits vapor pressure is 2 mm Hg). Compliance with the standard (264.1058) will be achieved through daily facility inspections and, if required, leak detection monitoring and repair. A copy of the daily inspection record and leak detection and repair record for equipment is enclosed.

The requirements of 270.25(b), 270.25(c), and 270.25(e) do not apply to Safety-Kleen's Medley facility.



EQUIPMENT SCHEDULE

MARK	DESCRIPTION
1	1 1/4" BALL VALVE (BARREL WASHER)
2	2" GATE VALVE
3	1 1/2" BALL VALVE (BARREL WASHER)
4	RECIRCULATING PUMP (BARREL WASHER)
5	1 1/2" BALL VALVE (BARREL WASHER)
6	1 1/4" BALL VALVE (BARREL WASHER)
7	2" GATE VALVE
8	RECIRCULATING PUMP (BARREL WASHER)
9	2" FLANGED BALL VALVE
10	2" FLANGED BALL VALVE
11	2" FLANGED BALL VALVE
12	STRAINER ASSY.
13	USED SOLVENT PUMP
14	2" FLANGED CHECK VALVE
15	3/8" AUTOMATIC VACUM BREAKER
16	3" FLANGED BALL VALVE
17	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
18	3" FLANGED CHECK VALVE
19	3" FLANGED BALL VALVE
20	3" FLANGED CAM LOCK
21	3" FLANGED BALL VALVE
22	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
23	3" FLANGED CAM LOCK
24	3" FLANGED BALL VALVE
25	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
26	3" FLANGED CAM LOCK
27	3" PRESSURE VACUM BREAKER

GENERAL NOTES

1.) ACTUAL PIPING CONFIGURATION MAY VARY.

2.) NON-PERMITTED TANKS AND EQUIPMENT MAY CHANGE.

NO.	DESCRIPTION	BY	CHK	APPR	DATE
D	REMOVED E.G. TANK & EQUIP.	MBH	KJM	DP	022195
C	REMOVED ABOVE GRATING REF.	MBH	KJM	DP/VC	010492
B	ADDED TAGS 40, 41 & 42	MBH	KJM	-	010492
A	RELEASED FOR PART "B" PERMIT	MBH		-	071092

REVISIONS

TITLE

ENVIRONMENTAL PIPING SCHEMATIC – EXISTING

Safety-Kleen Corp.
1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123
PHONE (708)697-8460

SCALE	BY	CHKD	APPROVED	EHS	DATE
NONE	MBH	KJM	DP	WC	07-09-92

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
MEDLEY, FL.	309702-GDPB200	D

Florida Department of 3/24 Knox

Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

PERMIT DATA FORM

PROJECT SOURCE NAME SAFETY-KLEEN /MEDLEY

Type Code HO Subcode MM Check If: ___GP ___Exempt

Correct Fee ____
Amount Received 500.00
Amount Refund ____

Permit Processor's Initial JKMS Data Entry Operator's Initial MCY

Comments
H013-216311 (original)

H013-267874

ERM-South, Inc.
9501 Princess Palm Ave.
Suite 100
Tampa, Florida 33619
(813) 622-8727
Fax (813) 621-8504

ERM

FIRST UNION NATIONAL BANK of FLORIDA
JACKSONVILLE, FL 32231

63-1012
632

023105

CHECK DATE	REFERENCE
3-10-95	23105

AMOUNT
500.00

12333

PAY: Five Hundred Dollars and No Cents

TO: Florida Department of Environmental Protection

ERM-South, Inc.
Jan A. Stout

Modification of HO13-216311

SOUTHEAST DISTRICT PERMIT PROCESSING WORKSHEET

LOGGING

NAME OF PROJECT SAFETY-KLEEN/MEDLEY

PROJECT LOG NO. HO13-267874 COUNTY DADE

DATE APPLICATION RECEIVED 3/24/95 30-DAY (HW 60-DAY) DATE 4/22/95

AMOUNT OF FEE PAID $500.00 COPIES OF PLANS _____

COPIES OF APPLICATION 1 COPIES OF SPECIFICATIONS _____

COPIES TO: CORPS__; LOCAL PROGRAM__; TALLAHASSEE__;DNR__;OTHER__

PERMIT REVIEW

PERMIT ASSIGNED TO MCKEE, KNOX AMOUNT OF FEE REQ'D $_____

DISCHARGE TO OR LOCATED IN AQUATIC PRESERVE: Yes__ No __ N/A ___

PERMIT STATUS AND CHRONOLOGY

DATE	REVIEWER'S INITIALS	COMMENTS

(continue on reverse side)

FIELD INSPECTION BY: _____ DATE _____; N/A _____

WATER MANAGEMENT COMMENTS (DATE) _____; N/A _____

LOCAL PROGRAM APPROVAL (DATE) _____; N/A _____

GPSI, APIS, OR PWS UPDATE DRAFTED: Yes _____ ; N/A _____

PUBLIC NOTICE LETTER ISSUED/PUBLISHED (DATES) _____ ; N/A _____

APPLICATION COMPLETION DATE _____ > DEFAULT DATE _____

>> D.A.S. 90+ DAYS INACTIVITY AUTHORIZATION: _____OK ____DENY <<

COMMENTS: _____

PERMIT, EXEMPTION, DENIAL DRAFTED BY: _____ DATE: _____

INTENT: PROGRAM HEAD _____ PROGRAM ADM. _____

FINAL DRAFT REVIEWED BY: _____ DATE: _____

FINAL DRAFT APPROVED BY: _____ DATE: _____

****

FINAL PROCESSING

DISTRIBUTION BY: _____ DATE: _____

PATS UPDATED BY: _____ DATE: _____

GPSI, APIS OR PWS UPDATED BY: _____ DATE: _____

WORD PROCESSOR: _____

AREA: SED Cash Receiving Application CRAF006A

Collection Point Log Remittance Tot: $500.00

SYS$REMT: 22734 Type: CP Recved Date: 24-MAR-1995 Status: RECEIVED

SYS$RCPT: 12333 PNR: Check #: 023105 Amount: 500.00

SSN/FEI#: Name: ERM-SOUTH, INC.

First: Middle: Title: Suf:

Address1: C/O_SAFETY_KLEEN_CORPORATION Short Comments:

Address2: 1000_NORTH_RANDALL_ROAD SAFETY-KLEEN/MEDLEY

City: ELGIN ST: IL Zip: 60123-7857 Country:

P A Y M E N T (S)

SYS$PAYT	Distr CL Area..	Object Code/Description.....:		Payment Amount........	Reference#	Applic/	Fund	STA
23722	SED	002234	HAZARDOUS_WASTE	$500.00	HO13267874		PFTF	CO

COMMIT FREQUENTLY $500.00 Payment total

Press_<TAB>_to_accept_Collection_Point_or_enter_F&A.

Count: *1 <Replace>

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Knof
1/28

Permit Data Form

Project Source Name: Safety Kleen - Medley-HW operating permit

Type Code: HO Subcode: MM Check #: ___ GP ___ Exempt

Correct Fee: 250

Amount Received: $ 250.00

Permit Processor's Initial: AH Data Entry Operator's Initial: MCY

Amount Refund: _____

Comments:

221141

HO-13-216311 (original)

HO-13-244550

ERM-South, Inc.
9501 Princess Palm Ave.
Suite 100
Tampa, Florida 33619
(813) 622-8727
Fax (813) 621-8504

ERM

FIRST UNION NATIONAL BANK of FLORIDA
JACKSONVILLE, FL 32231
63-1012
632

020548

CHECK DATE	REFERENCE
1-27-94	20548

AMOUNT
250.00

PAY: TWO HUNDRED FIFTY DOLLARS & NO/100

TO: FDEP

ERM-South, Inc.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

221141

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Erm - South, Inc. Date 1-28-94

Address 9501 Princess Palm Ave. Suite 100, Dollars $ 250.00
Tampa, FL 33619

Applicant Name & Address Safety Kleen Corp. 777 Big Timber Rd.,
Elgin, IL 60123

Source of Revenue SAFETY KLEEN CORP. (MEDLEY)

Revenue Code 002234 (020548) Application Number HO-13-244550

By Margarita C. Gomez

Modification of HO-13 216311

SOUTHEAST DISTRICT PERMIT PROCESSING WORKSHEET

LOGGING

NAME OF PROJECT SAFETY KLEEN CORP. (MEDLEY)

PROJECT LOG NO. HO-13-244550 COUNTY DADE

DATE APPLICATION RECEIVED 1/28/94 30-DAY (HW 60-DAY) DATE 2/26/94

AMOUNT OF FEE PAID $250.00 COPIES OF PLANS _____

COPIES OF ~~APPLICATION~~ letter 1 COPIES OF SPECIFICATIONS _____

COPIES TO: CORPS__; LOCAL PROGRAM__; TALLAHASSEE__;DNR__;OTHER__

PERMIT REVIEW

PERMIT ASSIGNED TO HOLNESS, DENISE AMOUNT OF FEE REQ'D $_____

DISCHARGE TO OR LOCATED IN AQUATIC PRESERVE: Yes__ No __ N/A ___

PERMIT STATUS AND CHRONOLOGY

DATE	REVIEWER'S INITIALS	COMMENTS

(continue on reverse side)

FIELD INSPECTION BY:_____DATE_____; N/A _____

WATER MANAGEMENT COMMENTS (DATE)_____; N/A _____

LOCAL PROGRAM APPROVAL (DATE)_____; N/A _____

GPSI, APIS, OR PWS UPDATE DRAFTED: Yes _____ ; N/A _____

PUBLIC NOTICE LETTER ISSUED/PUBLISHED (DATES)_____ ; N/A _____

APPLICATION COMPLETION DATE_____ > DEFAULT DATE_____

>> D.A.S. 90+ DAYS INACTIVITY AUTHORIZATION:_____OK ____DENY <<

COMMENTS: _____

PERMIT, EXEMPTION, DENIAL DRAFTED BY: _____DATE:_____

INTENT: PROGRAM HEAD_____PROGRAM ADM._____

FINAL DRAFT REVIEWED BY:_____DATE:_____

FINAL DRAFT APPROVED BY:_____DATE:_____

****

FINAL PROCESSING

DISTRIBUTION BY:_____DATE:_____

PATS UPDATED BY:_____DATE:_____

GPSI, APIS OR PWS UPDATED BY: _____DATE:_____

WORD PROCESSOR: _____

September 8, 1995

Mr. Knox McGee, Jr.
Hazardous Waste Supervisor
Florida Department of Environmental Protection
Suite A
P.O. Box 15425
West Palm Beach, FL 33416

Re: EMERGENCY PHONE NUMBERS: Safety-Kleen Corp.
Medley, Florida FLD 984-171-694
Emergency Contact List Update

Dear Mr. McGee,

Enclosed are four sets of revised pages iii for the Contingency Plan at the above referenced facility. The revised page includes changes in personnel assignments for supervisory positions.

Sincerely,

Jon Ercole, CHMM

cc D.A. Ridley
T. Sholl
A. Seyfer
999 file 1020

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

Revision 5--09-08-95

EMERGENCY PHONE NUMBERS

Emergency Coordinators:

Primary:	Tim Sholl 9001 SW 49 St. Cooper City, FL 33328 H. 305-680-3622 O. 305-884-0123 Beeper 305-650-5584	Alternate:	Ernesto S. Perez 710 W.33 St. Hialeigh,FL 33012 H. 305-824-1509 O. 305-884-0123 B. 305-650-5580

Emergency Notification Phone Numbers:

Safety-Kleen 24 hour EHS 708-888-4660

National Response Center: 800-424-8802

FDEP SE District, 1900 S. Congress Ave. West Palm Beach, FL 33406 407-433-2650 (M-F) Except Holidays. All other times call DEM

Florida Department of Emergency Management (DEM) 904-488-1320

Dade County Environmental Resources Management (DERM) Mr. Mike Graham 305-375-3376

Emergency Teams to be Notified

Metro Dade Fire Department
8175 NW 12th Street
Miami, FL 33126
305-470-1760 or 911

Medley Police Department
7331 NW 74th Street
Medley,FL 33166
305-887-9541 or 911

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

O.H. Materials Company
P.O.Box 551
Findlay, OH 45839
800-537-9540
Primary Clean-up Contractor

Ryckmans Emergency Action Team Consulting Team (REACT)
2208 Welsch Industrial Ct.
St. Louis, MO 63146
800-325-1398
Secondary Clean-up Contractor

Revision 5--09-08-95

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800-325-1398
Secondary Clean-up Contractor

safety-kleen

March 13, 1995

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

RE: Operating Permit Modifications, Safety-Kleen Corp., Medley, Florida; FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. (Safety-Kleen) has reviewed its current operations and determined that it is appropriate to manage nonhazardous spent ethylene glycol by commingling with used oil. Under hazardous conditions, the spent ethylene glycol may be handled in containers. The waste stream of spent ethylene glycol will no longer be accumulated and stored in the 20,000-gallon tank. The appropriate pages of the permit application have been revised to reflect managing this waste stream as described above.

The tank was permitted to hold spent ethylene glycol but never held any waste product. Currently, a small amount of water from the hydrostatic testing procedure exists in the tank. Per discussions between you and Jon Ercole, no decontamination of the tank is required. The tank will be designated as a 20,000-gallon product tank.

Updates to the emergency contact list have also been made and are included herein.

Table 1 provides instructions for updating the permit application. Two copies of the replacement pages are enclosed. Additional copies are being provided under separate cover to FDEP Tallahassee and Environmental Protection Agency (EPA) Region IV. Also enclosed is the required $500 modification fee.

If you have any questions or comments, please do not hesitate to contact Jon Ercole at (407) 734-2560.

Sincerely,

Al Seyfer
Regional Sales Manager

pjh/bai

Enclosure(s)

13112.21/01/KM031395.LTR/2

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-850

c: Jeffrey Grill - ERM
Cynthia Norton - ERM (letter only)

Chief, Waste Management Division
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Environmental Administrator
Hazardous Waste Regulation Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

TABLE 1
INSTRUCTIONS FOR UPDATING THE OPERATING PERMIT APPLICATION
MEDLEY, FLORIDA
FLD 984171694

Replace the following pages:

I.B.3-1
Figure I.B.3-1
I.D.2-5
I.D.3-1A
Figure II.A.1(a)-4
II.A.1(c)-1
Figure II.A.1(c)-1
II.A.4(b)iii
II.A.4(b)-1
II.A.4(b)-2
II.A.4(b)-3A
Figure II.A.4(b)-5
II.A.5-3
II.A.5-7
II.A.6-7
II.A.6-8
II.A.6-9A
II.A.6-9B
II.A.6-9C
II.A.6-9D
II.B.3-1
II.C.1-1
II.C.2 (Replace all text pages)
Figure II.C.2-1
Figure II.C.7-1
II.C.9-1
II.C.9-2
II.K.1-1
II.K.1-2
Attachment II.K.1 - Closure Cost Estimate Pages 1, 2, 3, and 6
II.S.1-1
Figure - Attachment II.S.1 - Safety-Kleen Environmental Piping Schematic - Existing

This is to certify that the modifications incorporated on this list have been examined by me and found to conform to engineering principles applicable to such facilities.

Robert W. Fox

Robert W. Fox, P.E. 3/13/95
License No. 40980

ATTACHMENT I.B.3
FACILITY LAYOUT AND PHOTOGRAPHS

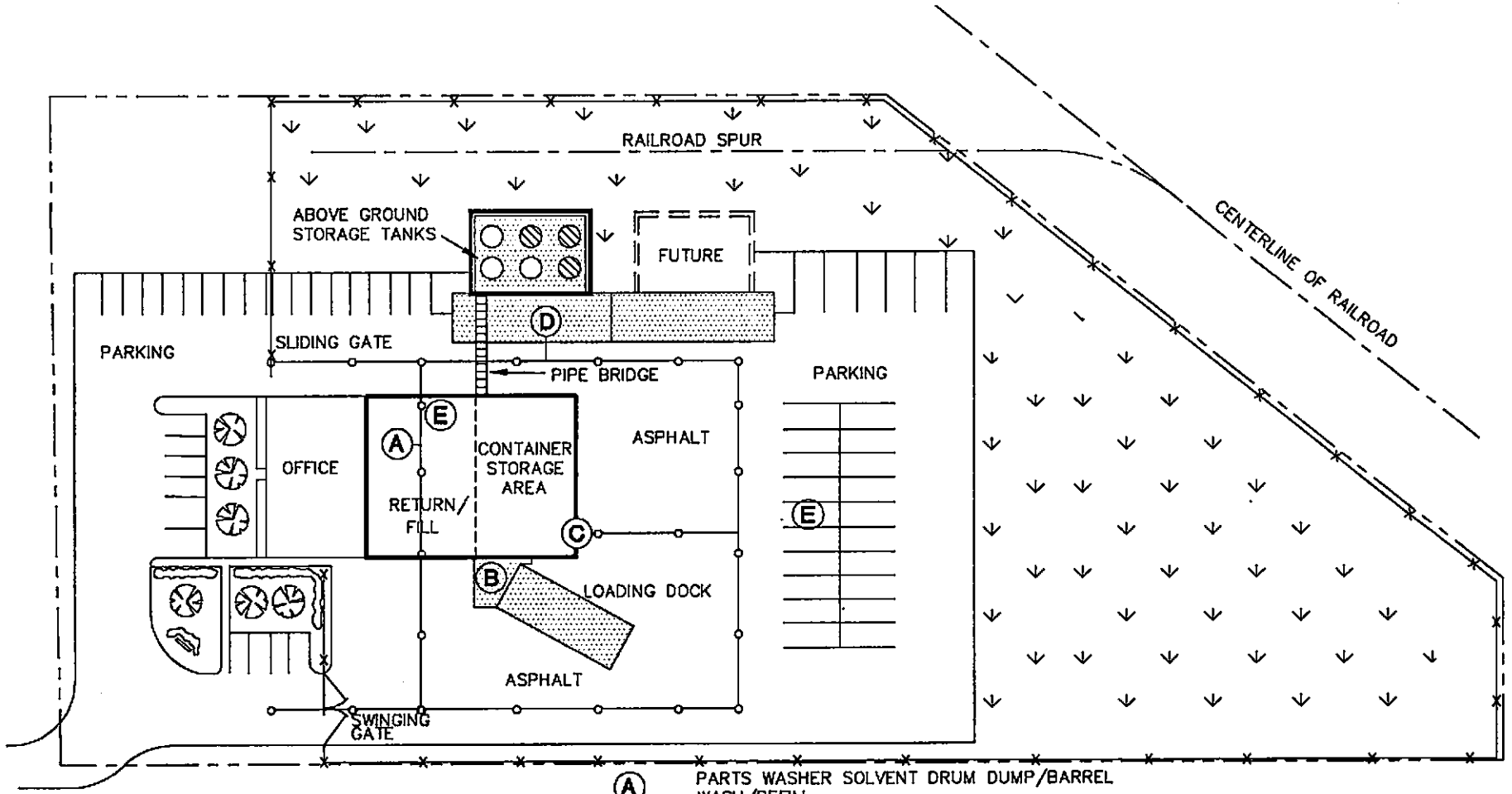
The service center (i.e., facility) layout and traffic patterns are illustrated in Figure I.B.3-1.

The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area 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 aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

U.S. 27, Okeechobee Road, 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 heavy 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. Traffic from this facility will have a minor impact on local traffic conditions.

Photographs which depict the hazardous waste management units, security features, and general layout of the facility are provided.

Figure I.B.3-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

(A) PARTS WASHER SOLVENT DRUM DUMP/BARREL WASH/REFILL

(B) LOADING & UNLOADING OF DRUMS CONTAINING SOLVENTS FROM TRUCKS

(C) LOADING & UNLOADING OF CONTAINERIZED WASTE FROM LOCAL AREA VANS & TRUCKS

(D) LOADING & UNLOADING OF PARTS WASHER SOLVENT

(E) TRUCK TO TRUCK TRANSFER OF FRS (TRANSFER) WASTES AND TANK TRUCK TO TANK TRUCK TRANSFER OF ETHYLENE GLYCOL

NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER

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center for processing. The filters from the Actrel® system will contain approximately the same constituents as dumpster mud.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container storage warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen recycle center.

Safety-Kleen also collects used oil filters and oily water. These materials are generally not hazardous wastes. The used oil and oily water may be managed in either drums or bulk tanks.

TABLE I.D.3-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula) IC609	S01****	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula) IC699	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01**	350	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Non-perchloroethylene)	S01****	Included Above	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

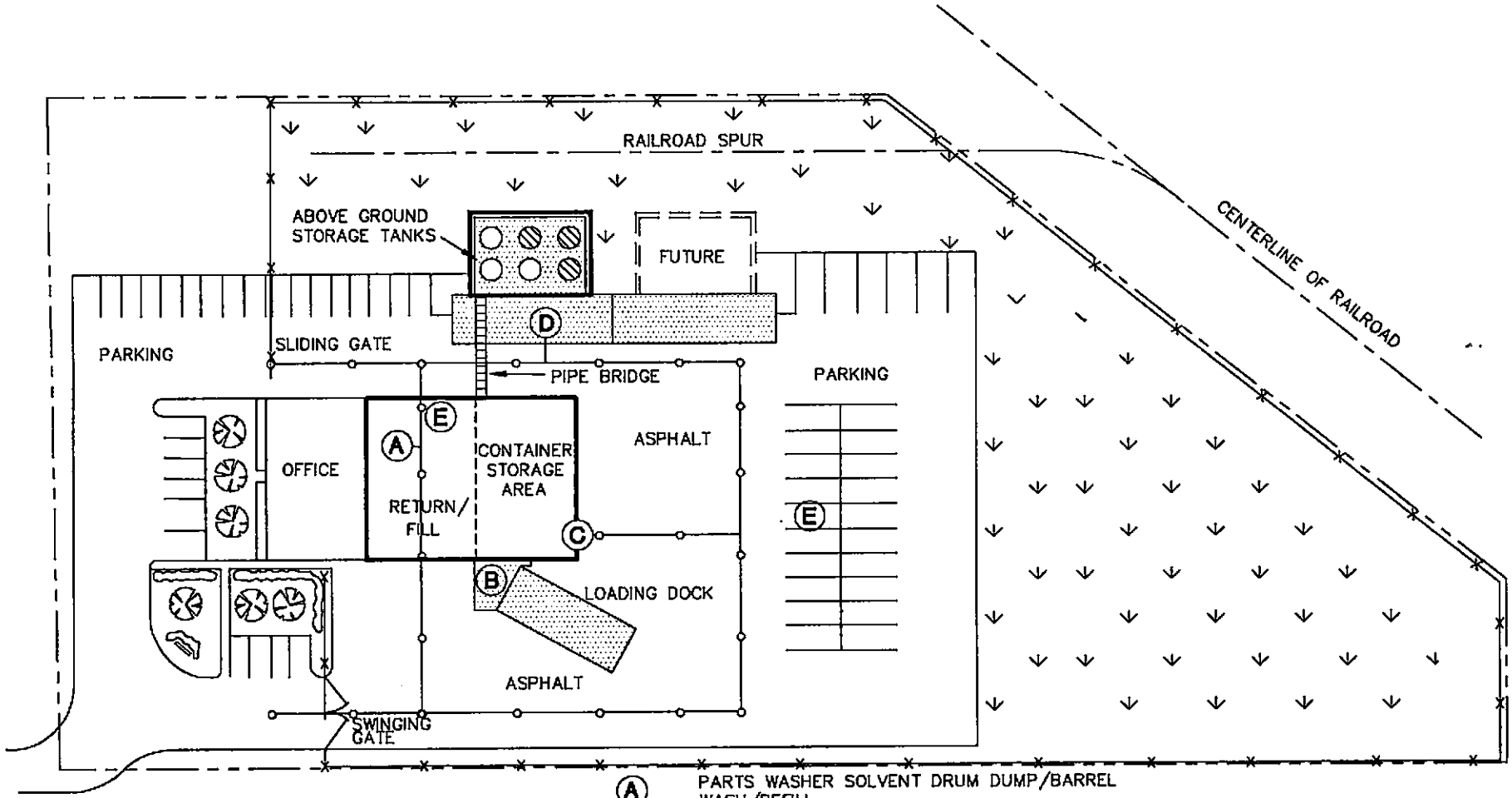
** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** These wastes are transfer wastes.

13112.21/31121LUL/031093-10

Figure II.A.1(a)-4
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



LEGEND

- PROPERTY BOUNDARY
- CHAIN-LINK FENCE
- HAZARDOUS WASTE MANAGEMENT AREAS
- CONCRETE
- ENTRANCE/EXIT ROUTE
- GRASS
- FUTURE TANK

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NOTE: THIS OCCURS ON ANY ASPHALT OR CONCRETE SURFACE EAST, NORTH OR SOUTH OF THE WAREHOUSE OR IN THE RETURN/FILL SHELTER

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ATTACHMENT II.A.1(c)
TRAFFIC INFORMATION

The service center (i.e., facility) layout and traffic patterns are illustrated in Figure II.A.1(c)-1.

The non-building areas of the facility are paved with asphalt or concrete as noted on the site plan. The stormwater retention areas and other unpaved areas are vegetated with grass. The majority of the vehicular traffic and loading/unloading operations occurs at and near the return and fill (area A) which is paved with asphalt and concrete. Approximately once per week a tractor trailer brings fresh containerized solvents and removes used, containerized solvents for transfer to a recycle facility. This truck backs up to the concrete dock, located on the southeastern side of the facility in area B, to load and unload containers. Area C is used for the loading/unloading of transfer wastes, and containerized permitted wastes from local area vans and trucks. The trucks dispatched from the recycle center to deliver fresh parts washer solvent and pick up used parts washer solvent will perform these activities at the aboveground tank truck loading area (Area D) approximately once per week. Truck to truck transfer of Fluid Recovery Service (FRS) (transfer) wastes may occur on any asphalt or concrete surfaces within the compound (Area E). Tank truck to tank truck transfer of ethylene glycol may also occur in Area E.

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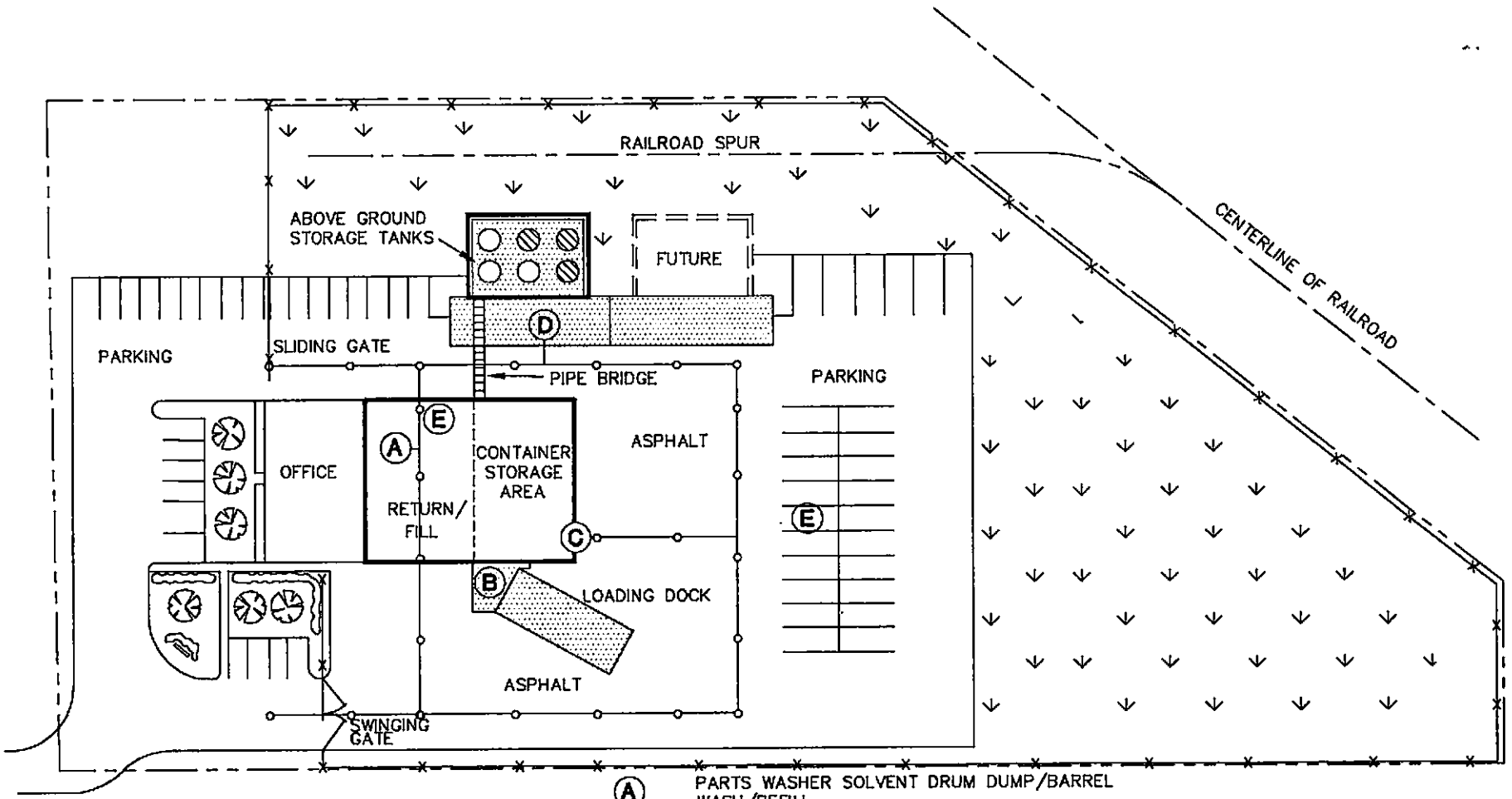
13112.21/31121LUL/031093-10

Figure II.A.1(c)-1
Truck Traffic Patterns and Loading/Unloading Areas of Hazardous Wastes
Safety-Kleen Corp. Facility
Medley, Florida



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EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary: Juan Formoso
9440 SW 55th Street
Miami, FL 33165
Home: (305) 595-8290
Office: (305) 884-0123
Beeper: (305) 737-4482

Alternate: Peter Ciocia
1909 NW 89th Terrace
Coral Springs, FL 33071
Home: (305) 341-4018
Office: (305) 884-0123
Beeper: (305) 827-1932

Emergency Notification Phone Numbers

Safety-Kleen Environment, Health and Safety Department
Telephone (708) 888-4660 (24-hour number)

National Response Center, Telephone (800) 424-8802

FDEP Southeast District, 1900 South Congress Avenue, West Palm Beach, FL 33406
Telephone (407) 433-2650 (Monday - Friday, 8 a.m. - 5 p.m., except holidays).
At all other times call the Florida Department of Emergency Management

Florida Department of Emergency Management
Telephone (904) 488-1320 (during non-FDER-SE business hours)

Dade County Environmental Resources Management, Mr. Mike Graham
Telephone (305) 375-3376 (24-hour)

Emergency Team to be Notified

Metro Dade Fire Department
8175 NW 12th Street
Miami, FL 33126
(305) 470-1760 or 911

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
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O.H. Materials Company
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Findlay, OH 45839-0551
(800) 537-9540
(Primary Cleanup Contractor)

Ryckman's Emergency Action and
Consulting Team
2208 Welsch Industrial Court
St. Louis, MO 63146
(800) 325-1398
(Secondary Cleanup Contractor)

ATTACHMENT II.A.4(b)

PREPAREDNESS, PREVENTION, CONTINGENCY PLAN, AND EMERGENCY PROCEDURES FOR DAILY BUSINESS OPERATIONS SAFETY-KLEEN CORP., MEDLEY, FLORIDA

GENERAL INFORMATION

Purpose

The preparedness, prevention, and contingency plan and emergency procedures are designed to 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 with the procedures contained in this plan.

General Description of Activities

The business activities conducted at the Medley Service Center 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 service center, where separate storage tanks are utilized for the storage of clean and used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®). There is one 20,000-gallon clean solvent storage tank and one 20,000-gallon product tank at this time. These tanks may store any of the clean parts washer solvents (Parts Cleaner 105, Premium Solvent, or Actrel®). Warehouse space is designated for the storage of containers of both clean and used immersion cleaner, used parts washer solvent sludge, antifreeze, paint waste, fluid recovery service (FRS) wastes, dry cleaning wastes (chlorinated solvent), and used oil. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are utilized for the management of containers whose integrity has been compromised.

The parts washer solvents are transported in covered containers between the service center and customers. Upon returning to the service center, the used parts washer solvents (Parts Cleaner 105, Premium Solvent, and Actrel®) are transferred from the containers into a wet dumpster/ barrel washer (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvent (Parts Cleaner 105,

Premium Solvent, and Actrel®) from the wet dumpster flows into a 20,000-gallon aboveground tank for storage. Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is cleaned out at least once per working day, containerized in satellite accumulation drums next to the wet dumpster units, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation. Satellite accumulation of parts washer solvent occurs in the return/fill area. These satellite accumulation points are associated with the operation of the dumpsters.

The immersion cleaner remains in covered containers at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility. Immersion Cleaner #609 is managed as a transfer waste and may be stored onsite for up to 10 days.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. The still bottoms, powder residue, and filters are packaged on the customer's premises in containers. All containers are DOT-approved. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The antifreeze waste is approximately two-thirds water and one-third antifreeze (ethylene glycol) and contaminants. These wastes are deposited into a carboy by the customer, which are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck by a Safety-Kleen sales representative. At the service center, the tanker truck may transfer its waste to another tanker truck. Tanker truck to tanker truck transfers of waste antifreeze are conducted at the return/fill shelter or on any asphalt or concrete surface. Hazardous spent antifreeze is handled in containers. The containerized waste is placed in the container storage area prior to shipment to a reclamation facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes),

TABLE II.A.4(b)-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Hazardous Spent Ethylene Glycol	S01**	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula)	S01**	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula)	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste	S01**	271	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

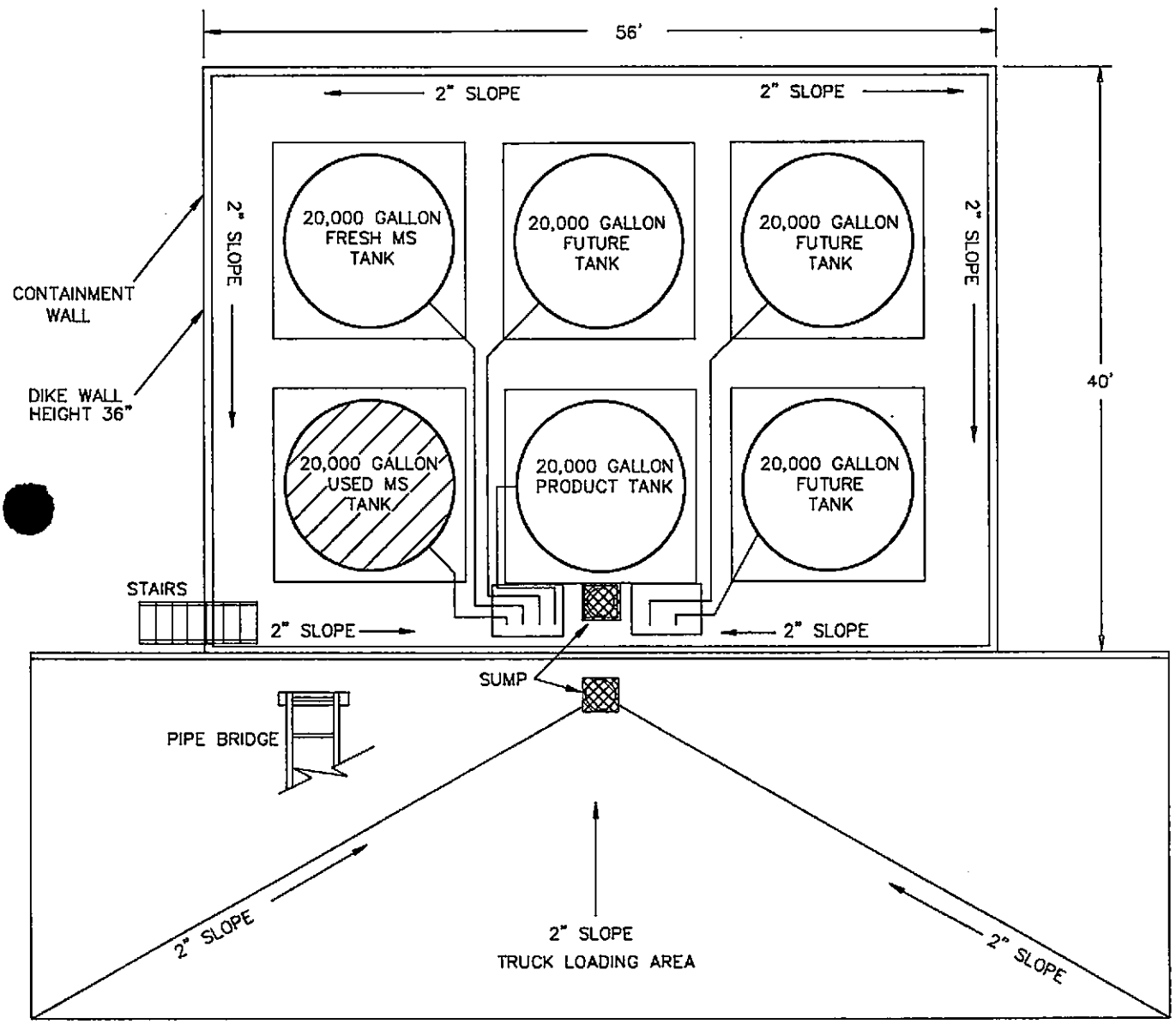
* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** FRS wastes are transfer wastes only.

Figure II.A.4(b)-5
Tank Farm
Safety-Kleen Corp. Facility
Medley, Florida



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6. Antifreeze waste is approximately two-thirds water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the container storage area for spent antifreeze will be permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

7. Paint wastes will consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds (D001, F003, and F005) and is a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste will be collected in containers at the customer's place of business and the containers will then be palletized whenever possible and stored in the paint waste storage area of the accumulation center.

8. Due to the great variability in the composition of Fluid Recovery Service (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. The FRS wastes are handled as transfer wastes only.

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

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.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into a carboy or containers by the customer, on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. A Safety-Kleen sales representative conducts the pumping of the contents of the carboy. At the service center, it is placed in the container warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen Recycle Center.

PAINT WASTES

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FLUID RECOVERY SERVICE WASTES

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. These wastes are handled as transfer wastes at the service center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.

2. Lubricating, hydraulic oils, and machine oils.

3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.

Lacquer Thinner Waste

The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in five-gallon pails. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7.5 gallons of solvent in the two collection pails. The solvent is pumped from a tube in a left hand pail (facing the machine) through the machine into a right hand pail. The tube in the left hand pail extends exactly half way into the pail (i.e., to the 2.5 gallon mark). The left hand pail starts with five gallons of clean solvent which will be pumped out as the machine is used to clean the spray guns. This process will continue until the left hand pail contains 7.5 gallons of solvent. Any solvent above 7.5 gallons remaining in the left hand pail at the time of servicing will be pumped through the machine into the right hand pail by the Safety-Kleen service representative. Therefore, when the machine is serviced, the right hand pail will always contain five gallons of solvent. If a service representative discovers more than a total of 7.5 gallons of solvent in the two pails or there is an overfill from the right hand pail, the waste will 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 service representative will insert a three-foot-long glass tube into the container. The tube should glide easily down to the bottom of the container. If there is resistance to the insertion of the glass tube, it is assumed that the level of solids is in excess of 30 percent and the service representative will reject the waste.

The contents of the glass tube are also visually examined for consistency and water content. The material should be a "free flowing" liquid, but should not contain a significant amount of water. If there is more than approximately 10 inches of water in the three-foot tube (the water and paint will separate in the tube and thus can be measured), the waste will be rejected.

Antifreeze Waste

Spent antifreeze is collected in carboys or containers at a customer's place of business until it is picked up by Safety-Kleen. Nonhazardous spent antifreeze is pumped into a tanker truck;

and hazardous spent antifreeze is handled in containers. Prior to transferring the spent antifreeze into the tanker truck or container, the Safety-Kleen service representative is responsible for visually inspecting the waste. Spent antifreeze is typically yellowish green to blue in color with traces of orange, red, or black discoloration due to ferric oxide (i.e., rust). A slight sheen may be present on the surface of the spent antifreeze due to the presence of oils or other petroleum products. Sediment (brownish or black) may collect in the carboy due to particulate matter from vehicle engines, rust, dirt, or other matter.

If the spent antifreeze does not meet the criteria described above, the Safety-Kleen service representative may collect a sample of the waste for analysis or request that the customer analyze the waste.

ONSITE ENVIRONMENTAL ACTIVITY REVIEW PROGRAM

Based on historical operating and analytical records, Safety-Kleen has determined that the characteristics of its customer's wastes (particularly the last 10 years) reflect that there has, in fact, been a continuing reduction in the trace levels of characteristically toxic constituents in these wastes. Therefore, in concert with the sampling described in this waste analysis plan, Safety-Kleen may conduct reviews of customer's waste streams. This review, in addition to the analytical baseline of information, will confirm that the hazardous waste streams managed at the Service Centers under conditions of the Part B Permit do not change from year to year. Annual process descriptions may be performed for Large Quantity Generators (LQGs) and Small Quantity Generators (SQGs) that generate these wastes.

If a review occurs, it will be performed at the customer's site by the Safety-Kleen sales representative during their regular service calls. The Safety-Kleen representative will meet with a customer representative who is knowledgeable of the Safety-Kleen services used at the facility. The Safety-Kleen representative will conduct an inspection of the facility and interview the customer. The inspection and interview will be used to generate: a description of the customer's processes, an inventory of waste streams, the principal product(s) or service(s), and the purpose for which Safety-Kleen solvents are used. This information will be used to complete a review document which will be certified and signed by the customer's representative and the Safety-Kleen representative. A copy of the completed review document will be kept on file at the Service Center and copy will be provided to the customer.

TABLE II.A.6-1
PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION

Hazardous Waste	Parameter[a]	Rationale
1. Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
2. Used Parts Washer Solvent	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
3. Parts Washer Solvent 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)
4. Parts Washer Solvent 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)
5. Dry Cleaning Wastes	Perchloroethylene TCLP	Contain ingredient of F002 or contains a hazardous constituent. Perchloroethylene formula is the only waste managed as a permitted waste.
6. Paint Wastes	Toluene, Xylene, Methyl ethyl ketone, Methyl isobutyl ketone, Acetone, Isopropanol, Methanol, Ethanol, Normal butyl acetate, Isobutyl acetate, Cadmium, Chromium, Lead	Contains these components: F003, F005, D001, D006, D007, and D008
7. Hazardous Spent Antifreeze	TCLP	May contain these compounds

FOOTNOTE:

[a] TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.

TABLE II.A.6-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	EPA 9045/SK9906
Flash Point	Tag closed cup tester	EPA 1030/SK9401
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
Specific Gravity	Meter	ASTM D 891/SK9903

TABLE II.A.6-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Immersion Cleaner (699IC)	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 Parts Washer Solvent	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanks--Bomb sampler (similar to weighted bottle sampler)
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Same as 2	Same as 2	Same as 2
4. Parts Washer Solvent Dumpster Mud	Same as 1	Same as 1	Same as 1
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
6. Paint Wastes	Same as 1	Same as 1	Same as 1
7. Hazardous Spent Antifreeze	Same as 1 or 2	Same as 1 or 2	Same as 1 or 2

TABLE II.A.6-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency[a]
1. Used Immersion Cleaner 699	Gas chromatograph annually TCLP annually
2. Used Parts Washer Solvent	Gas chromatograph annually Flash point annually TCLP annually
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP annually
4. Parts Washer Solvent Dumpster Mud	Gas chromatograph annually TCLP annually
5. Dry Cleaning Wastes	Gas chromatograph annually TCLP annually
6. Paint Wastes	Gas chromatograph annually TCLP annually
7. Hazardous Spent Antifreeze	Gas chromatograph annually TCLP annually

[a] 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.

ATTACHMENT II.B.3
WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials to be handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. However, they are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and fresh solvents is a standard practice at the facility.

All materials are managed in accordance with the local fire protection code and fire department requirements. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are used for the management of containers whose integrity has been compromised.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle center. Immersion Cleaner #609 is managed as a transfer waste.

The dry cleaning wastes are contained in containers. All containers are DOT-approved. These containers are managed similarly to the used immersion cleaner containers and contents within the containers are not removed or processed at the facility. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The parts washer solvents are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. Hazardous spent antifreeze is packaged in containers, and the containers are not opened at the facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are palletized and stored in the container storage area of the warehouse.

ATTACHMENT II.C.1

ENGINEERING ASSESSMENT OF TANK SYSTEM

An engineering assessment of the tank system has been prepared and is included herein. This assessment includes an evaluation of the structural integrity and suitability of the tank system for handling hazardous waste as required under 40 CFR 264.191 and 264.192.

The facility has undergone minor modifications in the recent past which no longer conform to the drawings and figures in this report. These minor modifications have not affected the tank volumes, system integrity, or secondary capacity of the tank system. For a current figure of the facility layout and tank farm, refer to figures I.B.3-1 and II.C.2-1.

ATTACHMENT II.C.2
TANK SYSTEM SPECIFICATIONS

The facility includes the capacity for six aboveground steel tanks (Figure II.C.2-1). Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) contained in containers returned from the customers are transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent (Parts Washer 105 or Premium Solvent) product tank and one 20,000-gallon product tank. The remaining three tanks are intended for future installation. The two product tanks are not considered RCRA tanks.

MATERIAL COMPATIBILITY

Parts washer solvent and ethylene glycol are compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent consist primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with C_{12} - C_{14} chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvents have a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

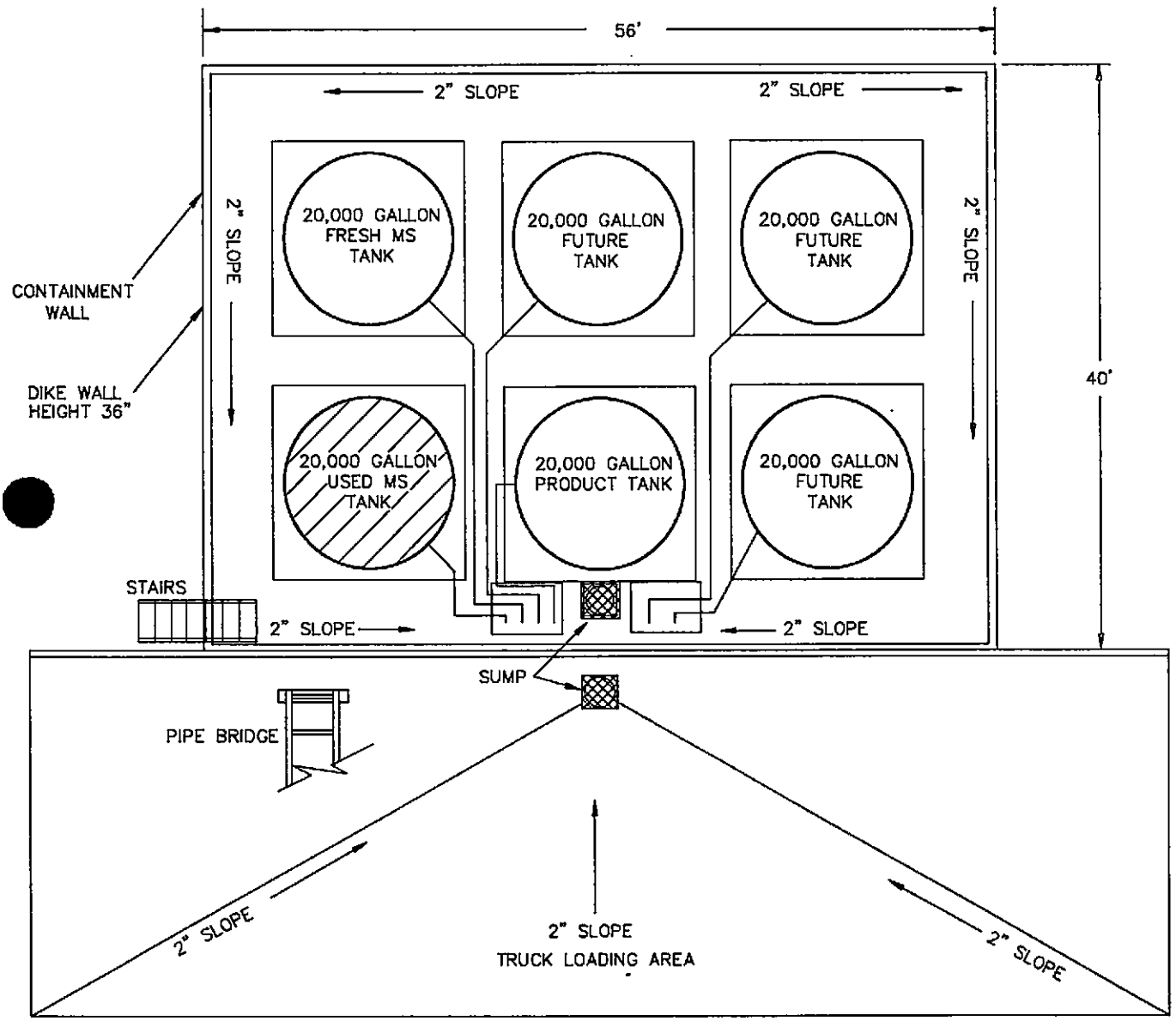
OPERATION PROCEDURES

Parts Washer Solvent

Spent parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill shelter. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster are pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

The barrel washers are located within the parts washer solvent return and fill shelters. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washers.

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



NOTE: ENTIRE AREA IS CONCRETE

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Used solvent is returned from customers via containers and poured into the barrel washers. The container is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the container to clean the inside of the barrel. The machine is turned off and the container removed. The procedure takes approximately five seconds per container. The container is then refilled using a pump and nozzle (Figure II.C.2-3(a)) similar to a gasoline pump. The waste is transferred to the tanks via piping and a pump (Figure II.C.2-3(b)).

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used parts washer solvent storage tank. There is a basket in the sump that collects sludge. At least once each working day, this basket is removed and sludge removed and placed into a sludge container. Each dumpster has four satellite accumulation containers. These containers are labeled as "Waste Sludge," "Glass/Metal," and "Rags/Absorbents." The Actrel® filters may be placed in the waste sludge container. The containers remain covered except when wastes are being added. Once full the containers are moved into the container storage area for later shipment to a Safety-Kleen recycle center for disposal or recycling. In addition to the sludge containers there is also one satellite accumulation container (approximately five gallons) connected to the drain pan which is in front of each barrel washer. These containers collect any spillage which fall into the drain pans. These containers are periodically emptied into the barrel washers in order to add the waste parts washer solvent to the bulk waste parts washer solvent tank.

Ethylene Glycol

Spent ethylene glycol is collected from customers in either containers or in tanker trucks. If the spent ethylene glycol is hazardous, it arrives at the service center in containers, then it is placed into the container storage area. If the spent ethylene glycol is nonhazardous, it arrives at the service center via tanker truck, then it may be transferred from tanker truck to tanker truck.

TANK DESIGN

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are shown in

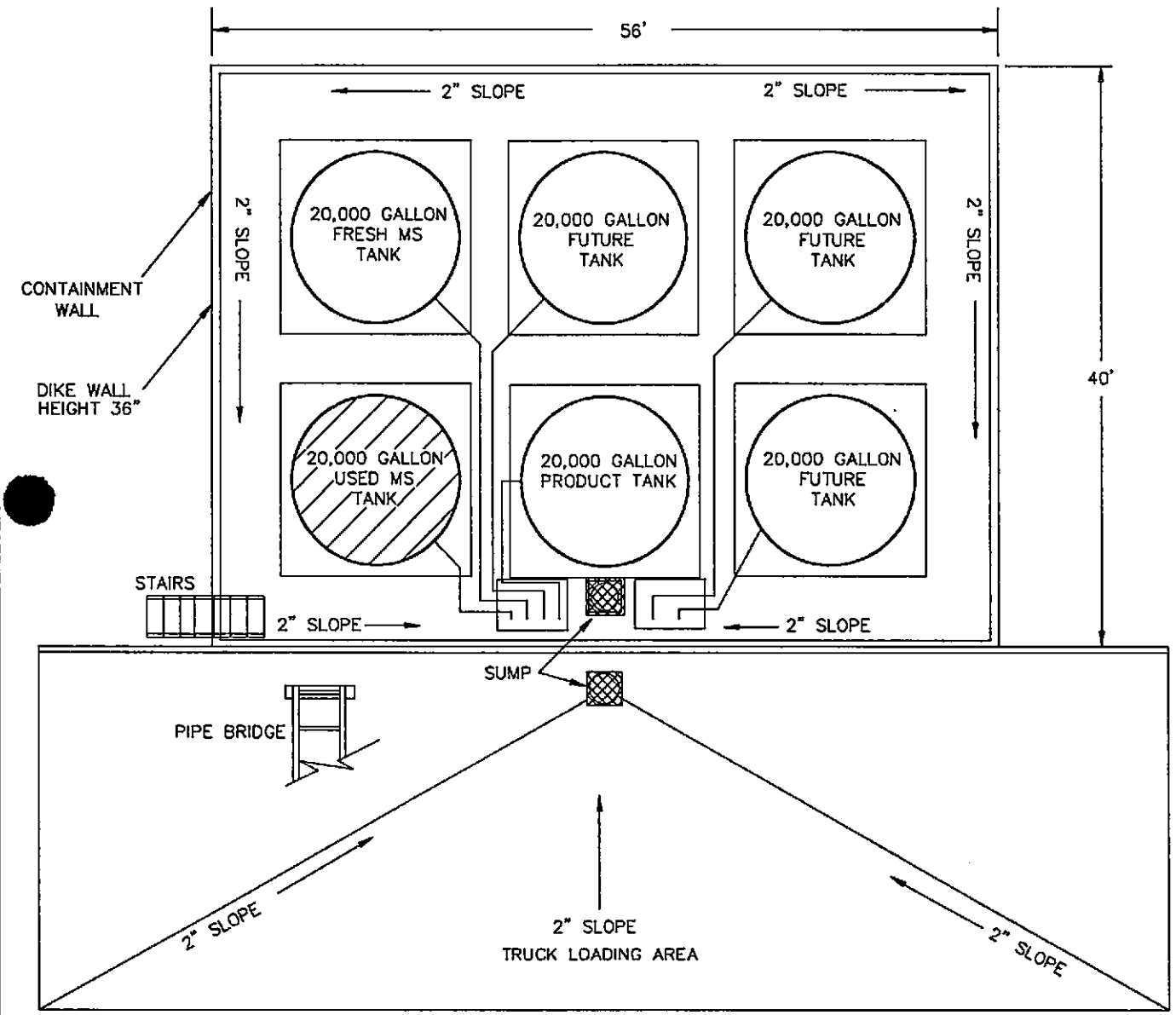
Figures II.C.2-4(a) and II.C.2-4(c). While this figure shows a parts washer solvent tank, the same design and installation specifications apply to the spent ethylene glycol tank. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. A sample design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(f). The exact brand of tank alarm equipment used is equivalent to those shown in Figures II.C.2-5(a) through II.C.2-5(f). The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer) in accordance with Underwriters Laboratories standards. All tanks are new and unused.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. The roof will extend over the tanker loading area. Therefore, no surface run-on is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters.

The tank farm dike and the return/fill shelter are sealed with a chemical resistant coating (Semstone 140). Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use are at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or tank. A tank truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill shelter is cleaned within 24 hours of a spill.

"No smoking" signs are posted at the tank farm and return/fill shelter.

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



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ATTACHMENT II.C.9
CONTROLS AND SPILL PREVENTION

The facility includes the capacity for six aboveground steel tanks. Used parts washer solvent housed in containers returned from the customers is transferred via the wet dumpster into a 20,000-gallon tank, awaiting bulk shipment to the recycle center. The other two installed tanks consist of one 20,000-gallon parts washer solvent product tank, and one 20,000-gallon product tank. The remaining three tanks are intended for future installation.

Parts washer solvent is compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. Parts Washer 105 and Premium Solvent are comprised primarily of mineral spirits (petroleum naphtha). The Actrel® solvent consists primarily of a paraffinic compound with C_{12} - C_{14} chains. As with all petroleum storage vessels, water will accumulate over time due to condensation. The parts washer solvent has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the product/water interface.

Spent parts washer solvent from parts washers is accumulated in the 20,000-gallon aboveground storage tank by transfer through the return and fill station. Containers of spent solvent are poured into the dumpsters (barrel washers) in the return and fill shelter, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill shelter has secondary containment.

The barrel washers are located within the return and fill shelter. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detailed information on the barrel washer. The barrel washer is a totally enclosed unit.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high level-alarms.

Attachment II.C.1 provides an independent assessment of the tank system performed upon completion of construction. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 58' 0" x 40' 0" concrete slab, surrounded by a 36-inch to 38-inch high concrete dike and will be covered by a roof by the end of July 1992. Therefore, no surface run-on or precipitation is in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. If rainwater does accumulate in the containment area and it has been verified that no spill has occurred, then rainwater will be discharged to the ground surface. Only the branch manager or someone operating under his direct orders may discharge to the ground surface. A written record will be kept of all discharges to the ground surface. If it is not possible to verify that a spill has not occurred, then the rainwater will be pumped into drums and added to the used parts washer solvent tank via the wet dumpsters. The tank farm dike is sealed with a chemical resistant coating (Semstone 140). Semstone 140 or equivalent will be used for all future repairs or recoating of this area. Level gauges (Figure II.C.2-6) are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) signal the tank's being 95 percent full. The exact brand of level gauges in use is at least equivalent to those shown in Figure II.C.2-6. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank are read before filling and before and during the filling of a tanker truck (the available volume of which is noted prior to emptying the tank) to prevent overfilling of the truck or the tank. A tanker truck provided with a suction pump is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station is cleaned within 24 hours of a spill.

ATTACHMENT II.K.1
CLOSURE PLAN

The Safety-Kleen Corp. has constructed each service center with the intent that each will be a long-term facility for the distribution of Safety-Kleen products. Based on current business and projected facility conditions, this facility is expected to remain in operation until the year of 2025.

In the event that some presently unforeseen circumstance(s) results in the discontinuance of operations and permanent closure or sale of the facility, the following closure plan is designed to identify the steps necessary to completely close the facility at any point during its intended life, and should be used for tanks, container storage area, and equipment.

It is intended that all closures will be complete and final with removal of waste and decontamination of the facility and associated equipment, in order to eliminate the need for maintenance after closure and the possibility of escape of hazardous waste constituents into the environment.

Procedures described in this closure plan are also applicable to cleaning up of spills and repairing/decontamination of the facility or equipment.

An anticipated closure schedule is presented in Figure II.K.1-1. At the present time, a closure permit is required to close the facility. An anticipated maximum waste inventory for the container storage portion of the facility is presented in the following section.

FACILITY DATA

Aboveground Storage Tanks: The 20,000-gallon vertical carbon steel waste parts washer solvent tank is in a 36-inch high concrete containment area.

Container Storage Areas

The container storage area is an area with a sloped floor and collection trench. The maximum volume of product and waste stored is 29,400 gallons, with 6,912 gallons as containers of waste dry cleaner, spent immersion cleaner, parts washer solvent dumpster mud, FRS wastes, spent antifreeze, and/or paint waste.

Return/Fill Shelter: The return/fill shelter is an approximate 54' 5" x 80' 0" structure between the two halves of the building. It contains four dumpsters which facilitate the flow of solvent to the tank. These dumpsters are not intended for storage, but can hold a maximum of 2,016 gallons (504 gallons each).

MAXIMUM INVENTORY OF WASTE

The maximum amount of waste parts washer solvent in the tank is 20,000 gallons.

The maximum amount of containerized waste is 6,912 gallons of waste. This amount includes any combination of five-gallon containers, 15-gallon containers (also known as split 30- or 20-gallon), 16-gallon containers, 30-gallon containers, 55-gallon containers, and/or 85-gallon overpacks.

The maximum amount of solvent waste in the dumpsters is 2,016 gallons (four 504-gallon dumpsters).

CLOSURE PROCEDURE

PHASE I--OPEN THE TANK

- Access to aboveground tanks is obtained by draining the products, de-gassing, and removing man-ways.

- Prior to opening the tanks, the personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they will be provided with

MEDLEY, FLORIDA SERVICE CENTER
CLOSURE COST ESTIMATE

1. TANK CLOSURE - Open, remove contents of, clean, remove, and dispose of one 20,000-gallon aboveground storage tank.

   Phase II - Remove Contents and Clean

   a. Ship contents to a reclaimer (approximately 19,000 gallons @ 95% capacity)

      Crew:

      4 truck drivers @ $17.56/hr. x 8 hrs. $ 561.92

      1 20,000-gallon tanks x 95% = 19,000 gal.
      19,000 ÷ 5,000 gal/truck = 4 trucks

      4 trucks x 80 miles x 1.75/loaded mile $ 560.00

      Reclamation cost ($0.30/gal. x 19,000 gal.) $ 5,700.00

   b. Clean tanks

      Crew:

      1 foreman @ $18.30/hr. x 12 hrs. $ 219.60

      2 laborers ($17.00/hr. & $3.00/hr. hazard pay) x 12 hrs. $ 480.00

   c. Pressure washer (1 day @ $400/day) $ 400.00

   d. Disposal and transportation of wash water (2,000 gal. @ $0.50/gal.) $ 1,000.00

   e. Transportation of wastewater (1,250 miles x $1.75/loaded mile) $ 2,187.50

   f. Analysis of 1 rinsate sample $ 200.00

   TOTAL PHASE I **$11,309.02**

Phase III - Remove and Dispose of Tanks

a. Disconnect and remove appurtenant equipment

Crew:

1 foreman @ $18.30/hr x 4 hrs.	$ 73.20
4 laborers @ $17.00/hr x 4 hrs.	$ 272.00

b. Remove tank

Crew:

1 foreman	$18.30/hr. x 4 hrs.	$ 73.20
4 laborers	$16.80/hr. x 4 hrs.	$ 268.80
1 backhoe	$250/day x 1 day	$ 250.00
1 crane w/operator	$500/day x 1 day	$ 500.00

c. Decontaminate and remove secondary containment system

Crew:

1 foreman	$18.30/hr. x 24 hrs.	$ 439.20
3 laborers	$16.80/hr. x 24 hrs.	$ 1,209.60
1 backhoe	$250/day x 2 days	$ 500.00
1 jackhammer	$150/day x 2 days	$ 300.00
1 pressure washer	$200/day x 1 day	$ 200.00
Test rinsate	(2 @ $200 each)	$ 400.00
Remove and dispose of rinsate	$0.50/gal. x 1,000 gal.	$ 500.00
Remove and dispose of concrete	$50/ton x 70 tons	$ 3,500.00
	TOTAL PHASE III	$ 8,486.00

Phase IV - Backfilling, Regrading, Soil Testing

a. Tests for soil contamination (1 per tank, 1 per pipe system)

2 samples x $640.00/each		$ 1,280.00

b. Test backfill material (1 sample @ $320) $ 320.00

c. Regrading

Crew:

1 foreman	$18.30/hr. x 4 hrs.	$ 73.20
1 laborer	$16.80/hr. x 4 hrs.	$ 67.20
Front-end loader	$350/day x 1 day	$ 350.00
Backfill (assume 10 CY required)	$10/CY x 10 CY	$ 100.00
	TOTAL PHASE IV	**$ 2,190.40**

Summary of Closure Costs for 2 20,000-Gallon Tanks

Phase II	$11,309.02
Phase III	$ 8,486.00
Phase IV	$ 2,190.40
TOTAL	**$21,985.42**

5.	PROFESSIONAL ENGINEER CERTIFICATION	$ 1,200.00
6.	TOTAL CLOSURE COSTS	
	One 20,000-Gallon Tank	$21,983.42
	Container Storage Area	$ 8,544.44
	Return/Fill Shelter	$ 8,893.60
	Professional Engineer Certification	$ 1,200.00
	TOTAL	**$40,623.46**

NOTE: These estimates are based on third-party costs.

ATTACHMENT II.S.1
EQUIPMENT

The following information is required under 40 Code of Federal Regulations (CFR) Section 270.25 for each piece of equipment which Subpart BB of Part 264 applies:

1. Equipment associated with the 20,000-gallon used parts washer solvent tank.

2. A site plan identifying the hazardous waste management unit at the facility is enclosed. Also enclosed are complete equipment inventory forms listing each piece of regulated equipment.

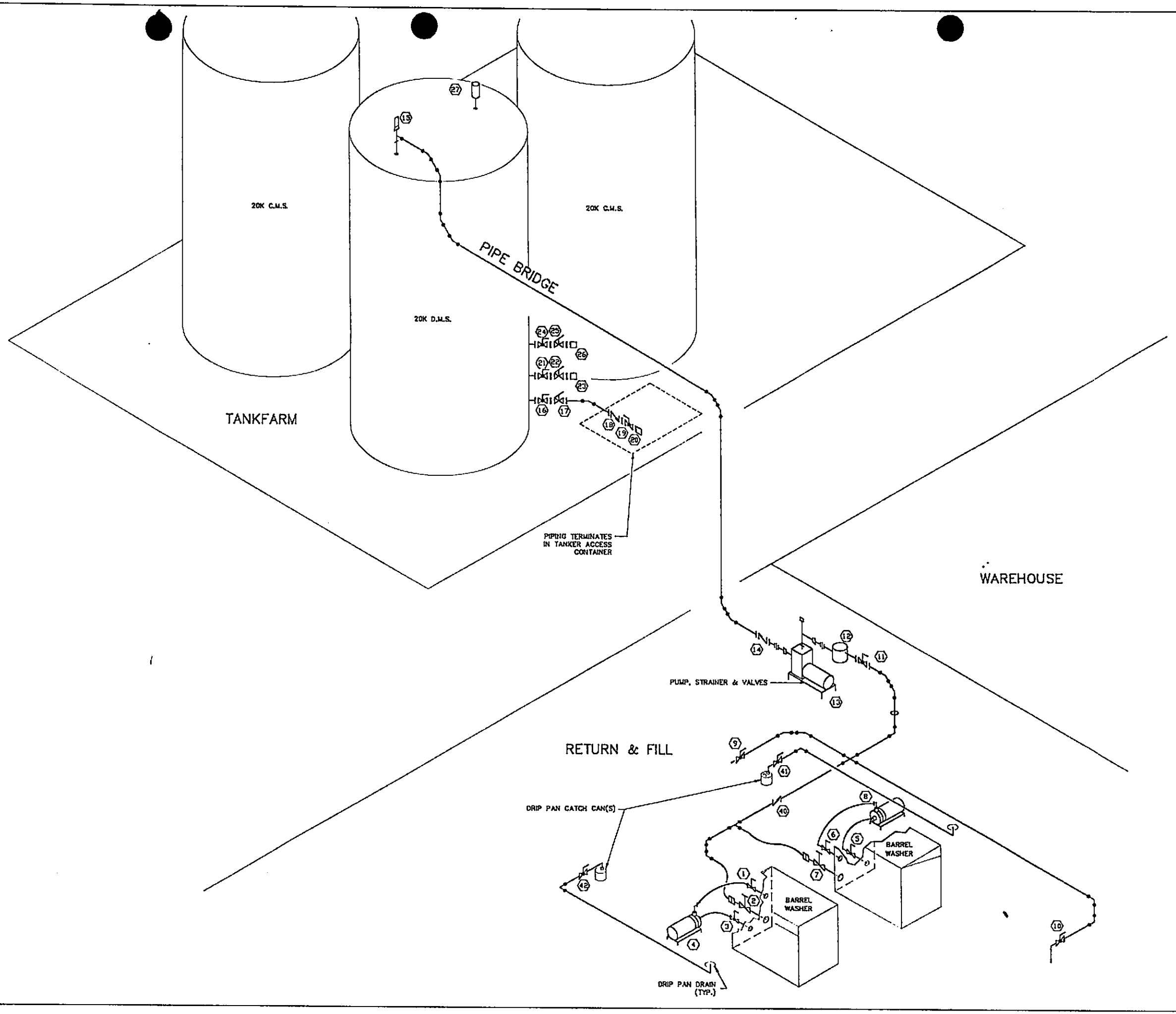
3. Types of equipment include pumps, flanges, and valves.

4. The hazardous waste stream is spent parts washer solvent, which can be considered to contain organics.

5. The hazardous waste state of parts washer solvent is liquid.

6. The equipment is considered to be heavy liquid service (mineral spirits vapor pressure is 2 mm Hg). Compliance with the standard (264.1058) will be achieved through daily facility inspections and, if required, leak detection monitoring and repair. A copy of the daily inspection record and leak detection and repair record for equipment is enclosed.

The requirements of 270.25(b), 270.25(c), and 270.25(e) do not apply to Safety-Kleen's Medley facility.



EQUIPMENT SCHEDULE

MARK	DESCRIPTION
1	1 1/4" BALL VALVE (BARREL WASHER)
2	2" GATE VALVE
3	1 1/2" BALL VALVE (BARREL WASHER)
4	RECIRCULATING PUMP (BARREL WASHER)
5	1 1/2" BALL VALVE (BARREL WASHER)
6	1 1/4" BALL VALVE (BARREL WASHER)
7	2" GATE VALVE
8	RECIRCULATING PUMP (BARREL WASHER)
9	2" FLANGED BALL VALVE
10	2" FLANGED BALL VALVE
11	2" FLANGED BALL VALVE
12	STRAINER ASSY.
13	USED SOLVENT PUMP
14	2" FLANGED CHECK VALVE
15	3/8" AUTOMATIC VACUM BREAKER
16	3" FLANGED BALL VALVE
17	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
18	3" FLANGED CHECK VALVE
19	3" FLANGED BALL VALVE
20	3" FLANGED CAM LOCK
21	3" FLANGED BALL VALVE
22	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
23	3" FLANGED CAM LOCK
24	3" FLANGED BALL VALVE
25	3" FLANGED EXTERNAL EMERGENCY GATE VALVE
26	3" FLANGED CAM LOCK
27	3" PRESSURE VACUM BREAKER

GENERAL NOTES

1.) ACTUAL PIPING CONFIGURATION MAY VARY.

2.) NON-PERMITTED TANKS AND EQUIPMENT MAY CHANGE.

NO.	DESCRIPTION	BY	CHK	APPR	DATE
D	REMOVED E.G. TANK & EQUIP.	MBH	K.M	DP	022195
C	REMOVED ABOVE GRATING REF.	MBH	K.M	DP/WC	010492
B	ADDED TAGS 40, 41 & 42	MBH	K.M	-	010492
A	RELEASED FOR PART "B" PERMIT	MBH		-	071092

REVISIONS

TITLE

ENVIRONMENTAL PIPING SCHEMATIC – EXISTING

Safety-Kleen Corp.
1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123
PHONE (708)697-8460

SCALE	BY	CHKD	APPROVED	EHS	DATE
NONE	MBH	K.M	DP	WC	07-09-92

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
MEDLEY, FL.	309702-GDPB200	D

safety-kleen®

May 18, 1995

RECEIVED
MAY 22 1995
DEPT OF ENV PROTECTION
WEST PALM BEACH

Mr. Knox McGee, Jr.
Hazardous Waste Supervisor
Florida Department of Environmental Protection
Suite A
P.O. Box 15425
West Palm Beach, FL 33416

Re: EMERGENCY PHONE NUMBERS: Safety-Kleen Corp.
Medley, Florida FLD 984-171-694
Emergency Contact List Update

Dear Mr. McGee,

Enclosed are four sets of revised pages iii for the Contingency Plan at the above referenced facility. The revised page includes changes in personnel assignments for supervisory positions.

Sincerely,

Jon Ercole

Jon Ercole, CHMM

cc D.A. Ridley
T. Sholl
A. Seyfer
999 file 1020

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708/697-8460 FAX 708/697-4295

Revision 4-05-10-95

EMERGENCY PHONE NUMBERS

Emergency Coordinators:

Primary:	Tim Sholl 9001 SW 49 St. Cooper City, FL 33328 H. 305-680-3622 O. 305-884-0123 Beeper 305-650-5584	Alternate:	Peter CioCio 1909 NW 89th Ter. Coral Spgs, FL 33071 H. 305-341-4018 O. 305-884-0123 B. 305-827-1932

Emergency Notification Phone Numbers:

Safety-Kleen 24 hour EHS 708-888-4660

National Response Center: 800-424-8802

FDEP SE District, 1900 S. Congress Ave. West Palm Beach, FL 33406
407-433-2650 (M-F) Except Holidays. All other times call DEM

Florida Department of Emergency Management (DEM) 904-488-1320

Dade County Environmental Resources Management (DERM) Mr. Mike Graham 305-375-3376

Emergency Teams to be Notified

Metro Dade Fire Department
8175 NW 12th Street
Miami, FL 33126
305-470-1760 or 911

Medley Police Department
7331 NW 74th Street
Medley,FL 33166
305-887-9541 or 911

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

O.H. Materials Company
P.O.Box 551
Findlay, OH 45839
800-537-9540
Primary Clean-up Contractor

Ryckmans Emergency Action Team
Consulting Team (REACT)
2208 Welsch Industrial Ct.
St. Louis, MO 63146
800-325-1398
Secondary Clean-up Contractor

Revision 4-05-10-95

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DEPARTMENT OF
ENVIRONMENTAL REG.
WEST PALM BEACH

Mike Self
Emergency Response Coordinator
Florida Department of Environmental
Protection - Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

RE: Safety-Kleen, Corp., Medley Facility, FLD ~~984 171 086~~ 984 171 694
8755 NW 95th Street
Medley, Florida 33178
Contingency Plan Update

Dear Sir:

Under terms of U.S. EPA Regulations 40 CFR 264, Subpart D, Safety-Kleen Corp. must provide local police, fire departments, hospitals, and State or local emergency response teams with a copy of the contingency plan for the referenced facility, and any revisions to the plan. A copy of the updated page iii of the emergency contacts for the Contingency Plan is enclosed for your files. Please review the updated page and insert it into the Contingency Plan.

EPA Regulations 40 CFR 264, Subpart C, require that Safety-Kleen attempt to make arrangements for the provision of emergency assistance. Emergency assistance for this facility may be needed from the police and fire departments, State emergency response teams and hospitals. The completion and return of the enclosed form will acknowledge receipt of this update to the contingency plan and provides your agreement to be available for emergency assistance.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit our facility, please contact me at 305-884-0123.

Sincerely,

Bob Michael
Acting Branch Manager
Medley Branch

Enclosure(s)

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

_____
(Date)

Emergency Response Coordinator
Florida Department of Environmental
Protection - Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Mr. Bob Michael
Branch Manager
Safety-Kleen Corporation
8755 NW 95th Street
Medley Florida 33178

Subject: Safety-Kleen, Corp., Medley, Florida
FLD 984 171 694
Contingency Plan Update

Dear Mr. Michael:

This is to acknowledge that the Florida Department of Environmental Regulation - Southeast District has been made aware of the potential need for emergency assistance associated with the operation of the Safety Kleen Corporation Facility at 8755 NW 95th Street, Medley Florida, Dade County, Florida. The Florida Department of Environmental Regulation - Southeast District understands that the emergency coordinator is available to provide additional information on the nature of assistance that may potentially be required, type of physical and chemical hazards that may potentially be encountered and the type of injury or illness that may potentially occur.

This is to acknowledge receipt of the updated information of the Contingency Plan for the Medley, Florida facility. This information has been incorporated into our copy of the plan.

Sincerely,

_____
(Signature)

_____
(Title)

_____CHECK HERE IF YOU DO NOT HAVE A COPY OF THE CONTINGENCY PLAN FOR THIS SAFETY-KLEEN FACILITY.

EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary:
Juan Formosa
9440 SW 55th Street
Miami, FL 33165
Home: (305) 595-8290
Office: (305) 884-0123
Beeper: (305) 737-4482

Alternate:
Richard Trujillo
4855 NW 191 Street
Miami, FL 33055
Home: (305) 624-8642
Office: (305) 884-0123
Mobile: (305) 331-6909

Emergency Notification Phone Numbers

Safety-Kleen Environmental, Health and Safety Department
Telephone: (708) 888-4660 (24-hour number)

[1]National Response Center, Telephone: (800) 424-8802

FDEP-Southeast District, 1900 South Congress Avenue, West Palm Beach, FL 33406
Telephone: (407) 433-2650 (Monday - Friday, 8 a.m. - 5 p.m., except holidays).
At all other times call the Florida Department of Emergency Management.

Florida Department of Emergency Management
Telephone: (904) 488-1320 (during non-FDEP-SE business hours)

Dade County Environmental Resources Management, Mr. Mike Graham
Telephone: (305) 375-3376 (24-hour)

Emergency Team to be Notified

Metro Dade Fire Department
8175 Northwest 12th Street
Miami, FL 33126
911 or (305) 470-1760

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
911 or (305) 887-9541

Palmetto General Hospital
2001 West 68th Street
Hialeah, FL 33016
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(800) 537-9540
(Primary Clean-Up Contractor)

REACT Environmental Engineers
2200 Welch Industrial Court
St. Louis, MO 63146
(800) 325-1398
(Secondary Clean-Up Contractor)

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[1]Call NRC only if the Florida Department of Emergency Management cannot be reached.

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DEPARTMENT OF
ENVIRONMENTAL REG.
WEST PALM BEACH

HAND DELIVERED ON

Hazardous Waste Supervisor
Florida Department of Environmental
Regulation - Southeast District
1900 South Congress Avenue, Suite A
West Palm Beach, Florida 33406

RE: Safety-Kleen, Corp, Medley, FLD 984 171 694
Operating Permit HO13-216311
Emergency Contact List Update

Dear Sir:

Enclosed are four sets of revised pages iii for the Contingency Plan of the above referenced facility. This revised page includes the revised telephone contact numbers as necessary.

Should you have any questions, please contact me at 305-884-0123.

Sincerely,

Bob Michael
Branch Manager
Medley Branch

Enclosure

c: C.Norton - ERM

SAFETY-KLEEN
Environmental, Health and Safety
Interoffice Memorandum

RE: Contingency Plan Update

DATE: May 24, 1994

TO: Bob Michael
BM/Medley

FROM: Bill Crawford
EE Florida

cc: Regional file
Della Ridley (file V)

The attached letters to the Medley Police Department, the Metro-Dade Fire Department, the Palmetto General Hospital, and the FDER emergency coordinator for the Medley area are being forwarded to the branch to allow hand delivery of the letters to the affected parties.

The practice of delivering the letters in persons is being initiated for the following reasons:

* The Branch Manager or Branch Facility Manager can become acquainted with the different responding agencies. Additional information can be communicated, and the possibility of a site visit by the different agencies can be explored.

* The Branch Manager or Branch Facility Manager can ensure that the agencies have a current copy, or provide one at the time of the visit.

* The Branch Manager or Branch Facility Manager can obtain the signed letter of agreement/disagreement from the agency at the time of the visit.

These letters need to be signed and dated the date you intend to deliver them, and copies distributed according to the bc list. When the letter of agreement/disagreement is signed the original should be forwarded to the regional environmental office for distribution.

The delivery of these letters to the affected agencies should occur December 10, 1993, and return of the signed copies to the regional environmental staff the day after signing.

Should you have questions, please contact me a 813-682-8094.

bc. Della Ridley, REM Southeast Region (Medley file I.c.)
Bob Michael, Acting Branch Manager (999 file 1020 and 1410)
Field File I.c.

EMERGENCY PHONE NUMBERS

Emergency Coordinators

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Juan Formosa
9440 SW 55th Street
Miami, FL 33165
Home: (305) 595-8290
Office: (305) 884-0123
Beeper: (305) 737-4482

Alternate:
Richard Trujillo
4855 NW 191 Street
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Office: (305) 884-0123
Mobile: (305) 331-6909

Emergency Notification Phone Numbers

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Telephone: (708) 888-4660 (24-hour number)

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[1]Call NRC only if the Florida Department of Emergency Management cannot be reached.

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DEPARTMENT OF
ENVIRONMENTAL REG.
WEST PALM BEACH

HAND DELIVERED ON

Hazardous Waste Supervisor
Florida Department of Environmental
Regulation - Southeast District
1900 South Congress Avenue, Suite A
West Palm Beach, Florida 33406

RE: Safety-Kleen, Corp, Medley, FLD 984 171 694
Operating Permit HO13-216311
Emergency Contact List Update

Dear Sir:

Enclosed are four sets of revised pages iii for the Contingency Plan of the above referenced facility. This revised page includes the revised telephone contact numbers as necessary.

Should you have any questions, please contact me at 305-884-0123.

Sincerely,

Bob Michael
Acting Branch Manager
Medley Branch

Enclosure

c: C.Norton - ERM

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

SAFETY-KLEEN
Environmental, Health and Safety
Interoffice Memorandum

RE: Contingency Plan Update

DATE: May 24, 1994

TO: Bob Michael
BM/Medley

FROM: Bill Crawford
EE Florida

cc: Regional file
Della Ridley (file V)

The attached letters to the Medley Police Department, the Metro-Dade Fire Department, the Palmetto General Hospital, and the FDER emergency coordinator for the Medley area are being forwarded to the branch to allow hand delivery of the letters to the affected parties.

The practice of delivering the letters in persons is being initiated for the following reasons:

* The Branch Manager or Branch Facility Manager can become acquainted with the different responding agencies. Additional information can be communicated, and the possibility of a site visit by the different agencies can be explored.

* The Branch Manager or Branch Facility Manager can ensure that the agencies have a current copy, or provide one at the time of the visit.

* The Branch Manager or Branch Facility Manager can obtain the signed letter of agreement/disagreement from the agency at the time of the visit.

These letters need to be signed and dated the date you intend to deliver them, and copies distributed according to the bc list. When the letter of agreement/disagreement is signed the original should be forwarded to the regional environmental office for distribution.

The delivery of these letters to the affected agencies should occur December 10, 1993, and return of the signed copies to the regional environmental staff the day after signing.

Should you have questions, please contact me a 813-682-8094.

bc. Della Ridley, REM Southeast Region (Medley file I.c.)
Bob Michael, Acting Branch Manager (999 file 1020 and 1410)
Field File I.c.

EMERGENCY PHONE NUMBERS

Emergency Coordinators

Primary: Juan Formosa
9440 SW 55th Street
Miami, FL 33165
Home: (305) 595-8290
Office: (305) 884-0123
Beeper: (305) 737-4482

Alternate: Richard Trujillo
4855 NW 191 Street
Miami, FL 33055
Home: (305) 624-8642
Office: (305) 884-0123
Mobile: (305) 331-6909

Emergency Notification Phone Numbers

Safety-Kleen Environmental, Health and Safety Department
Telephone: (708) 888-4660 (24-hour number)

[1]National Response Center, Telephone: (800) 424-8802

FDEP-Southeast District, 1900 South Congress Avenue, West Palm Beach, FL 33406
Telephone: (407) 433-2650 (Monday - Friday, 8 a.m. - 5 p.m., except holidays).
At all other times call the Florida Department of Emergency Management.

Florida Department of Emergency Management
Telephone: (904) 488-1320 (during non-FDEP-SE business hours)

Dade County Environmental Resources Management, Mr. Mike Graham
Telephone: (305) 375-3376 (24-hour)

Emergency Team to be Notified

Metro Dade Fire Department
8175 Northwest 12th Street
Miami, FL 33126
911 or (305) 470-1760

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
911 or (305) 887-9541

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

O.H. Materials Company
P.O. Box 551
Findley, OH 45840
(800) 537-9540
(Primary Clean-Up Contractor)

REACT Environmental Engineers
2200 Welch Industrial Court
St. Louis, MO 63146
(800) 325-1398
(Secondary Clean-Up Contractor)

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safety-kleen®

HO-13-244550

January 25, 1994

Mr. Knox McKee
Florida Department of
Environmental Protection
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, FL 33406

RE: Minor Modification to the Operating Permit Application, Safety-Kleen Corp., Medley, Florida; FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. is submitting a minor modification to the operating permit application for the above-referenced facility. This modification is for the relocation of the used solvent pump to below grating. The attached environmental piping schematic has been changed to delete the words "above grating" which were associated with the used solvent pump, (pump number 13). Please replace this schematic which is located in attachment II.S.1, Equipment, of the permit application with the updated version.

Enclosed is the $250 minor modification fee.

If you have any questions or comments, please do not hesitate to contact me at (813) 682-8094.

Sincerely,

William Crawford
Field Environmental
Tampa Region

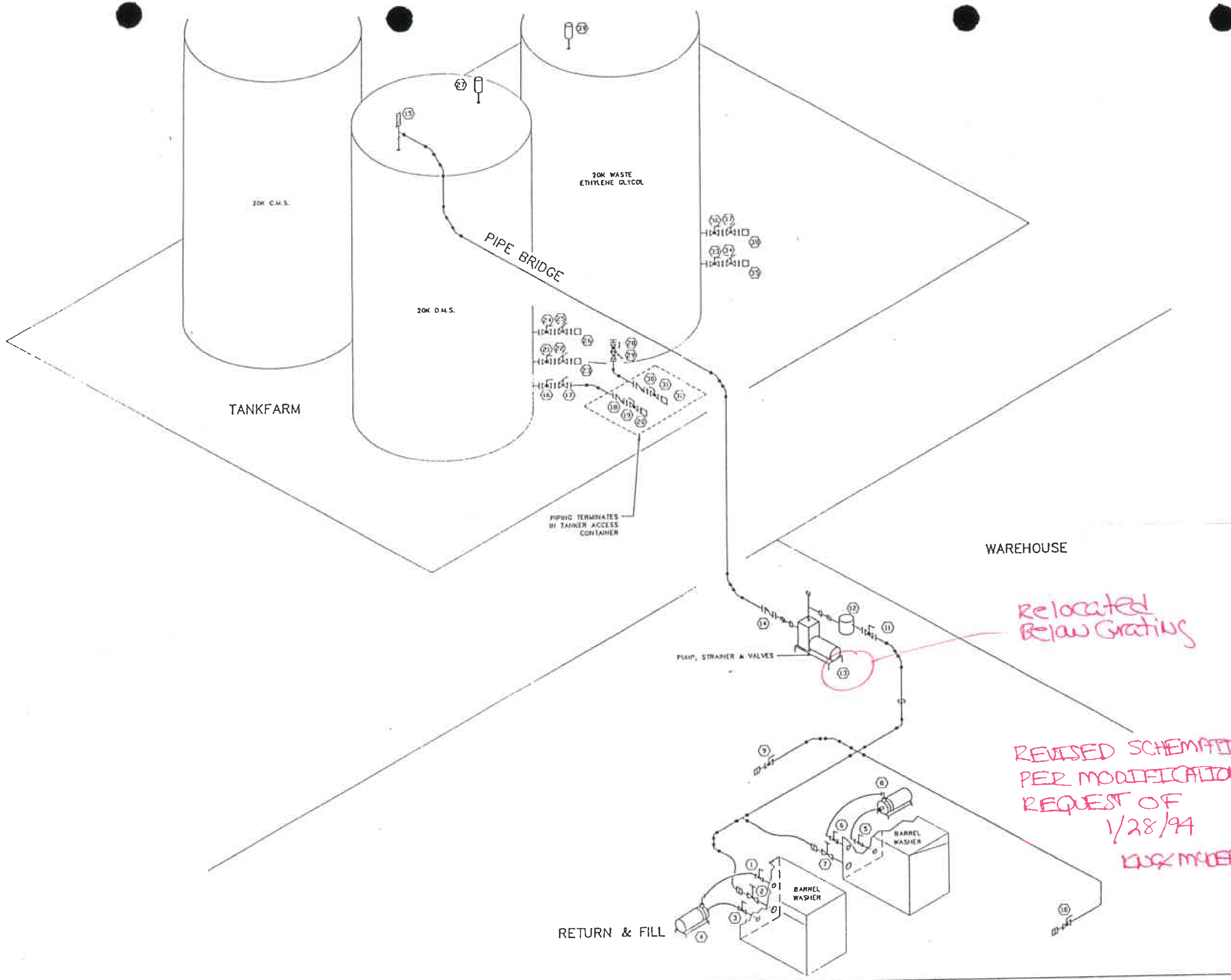
mmm/pjh

Enclosure(s)

c: C. Norton - ERM

13113.21/01/KM012594.LTR/4

129 S. KENTUCKY AVE, SUITE 701 LAKELAND, FL 33801 PHONE 813/682-8094 FAX 813/688-3683



GENERAL NOTES

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORPORATION. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING.

EQUIPMENT SCHEDULE

MARK	DESCRIPTION
1	1 1/2" BALL VALVE (BARREL WASHER)
2	2" GATE VALVE
3	1 1/2" BALL VALVE (BARREL WASHER)
4	RECIRCULATING PUMP (BARREL WASHER)
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NO	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED FOR PART "B" PERMIT	MBH		-	[illegible]

REVISIONS

TITLE

ENVIRONMENTAL PIPING
SCHEMATIC – EXISTING

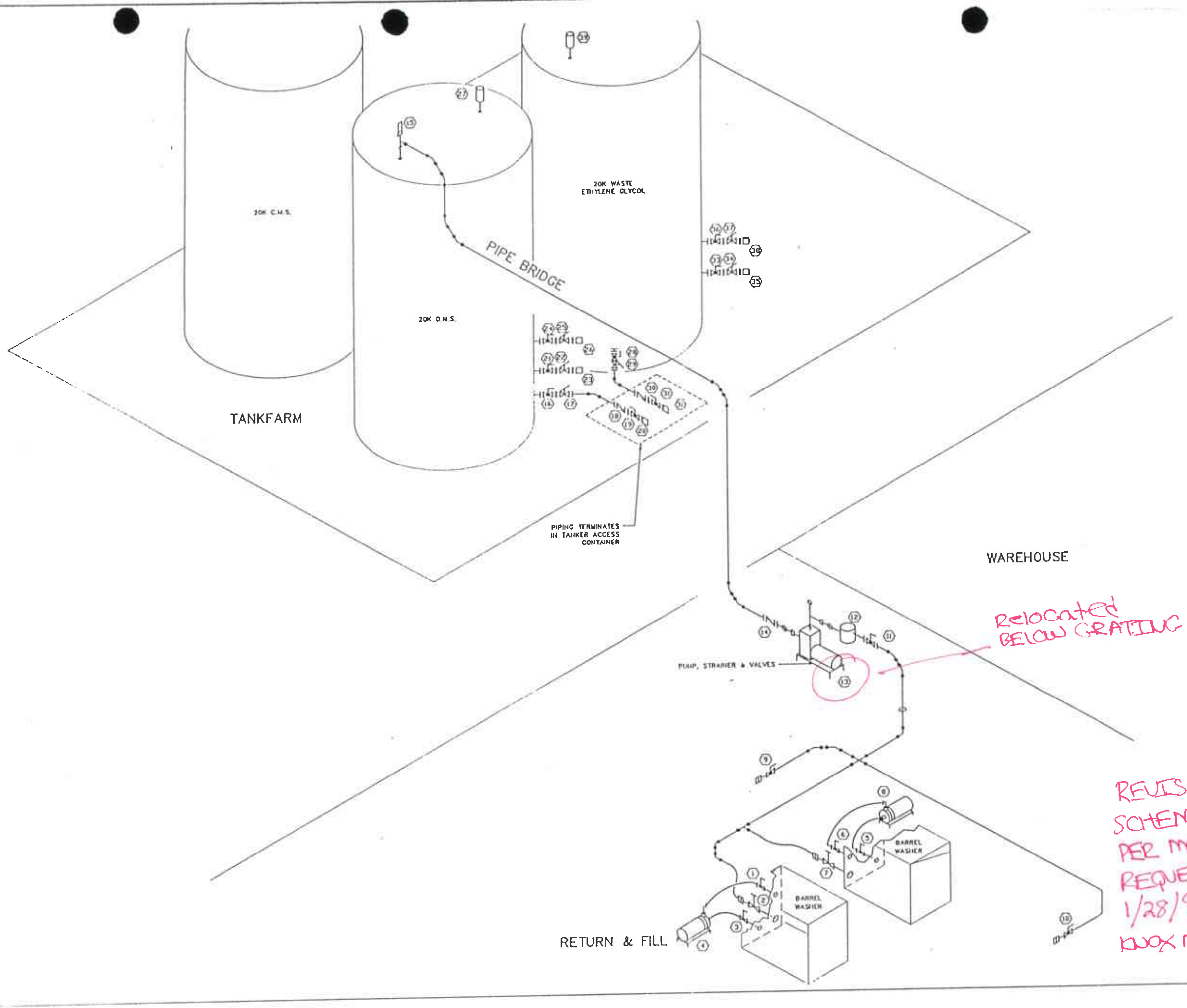
SAFETY-KLEEN CORP.

[illegible]

SCALE	BY	CHKD	APPR	OP. APPR	DATE
NONE	MBH		-	-	[illegible]

SERVICE CENTER LOCATION	SC-DWG NUMBER	REV. NO.
MEDLEY, FL.	GDPB200	A

KJK/MHEE



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REV.	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED FOR PART "B" PERMIT	HBH		-	8/18/92

REVISIONS

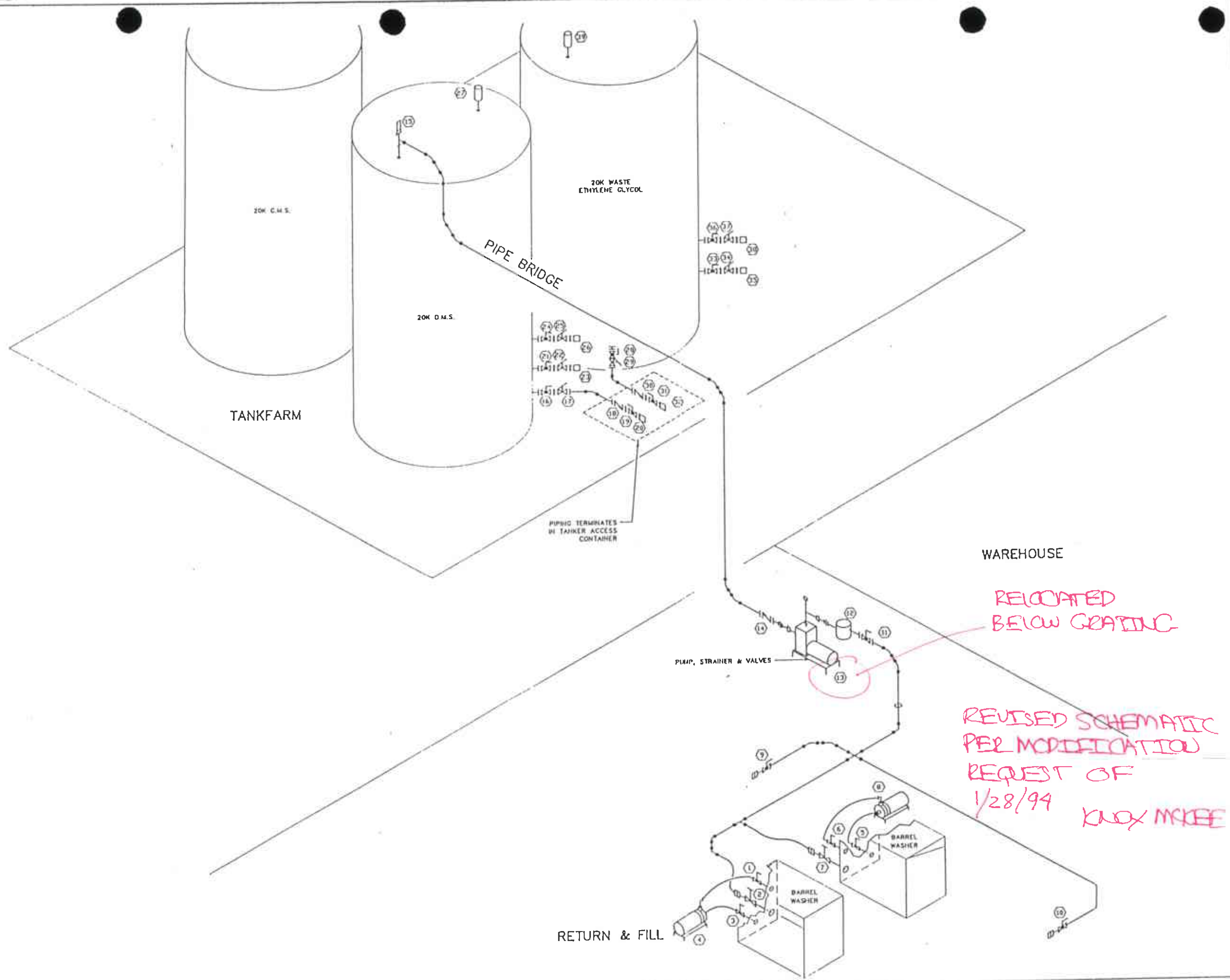
REVISED SCHEMATIC PER MODIFICATIONS REQUEST OF 1/28/94 KNOX MCKEE

TITLE: ENVIRONMENTAL PIPING SCHEMATIC – EXISTING

SAFETY-KLEEN CORP.
777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708-697-8460

SCALE	BY	CHKD	APPR.	OP. APPR.	DATE
NONE	HBH		-	-	07-08-92

SERVICE CENTER LOCATION: MEDLEY, FL.
SC-DWG NUMBER: GDPB200
REV. NO.: A



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REVISED SCHEMATIC PER MODIFICATION REQUEST OF 1/28/94 KNOX MCKEE

NO.	DESCRIPTION	BY	CHK	APPR	DATE
A	RELEASED FOR PART "B" PERMIT	MRH		-	021892

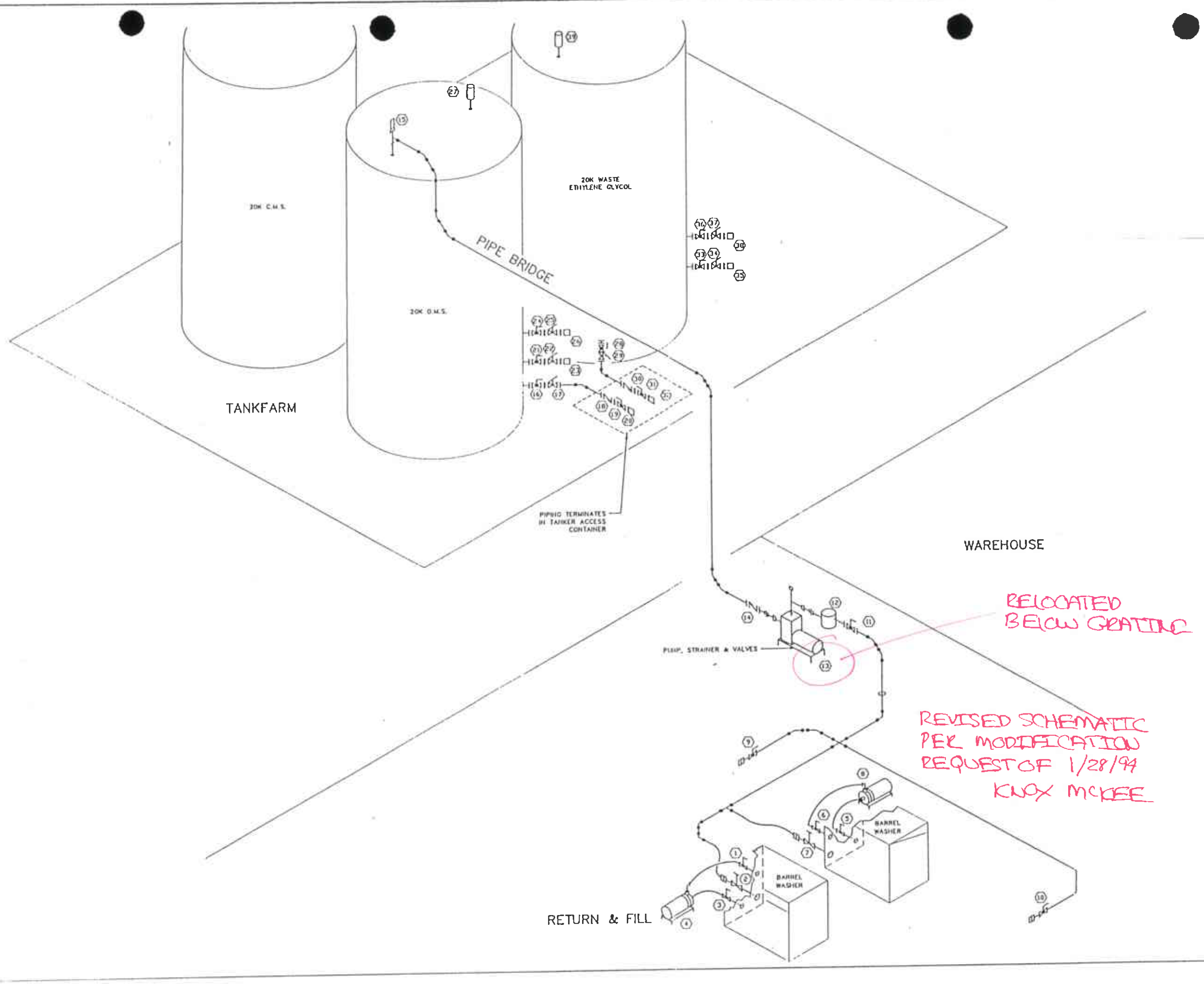
REVISIONS

TITLE

ENVIRONMENTAL PIPING SCHEMATIC – EXISTING

SAFETY-KLEEN CORP.
777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708-697-8460

SCALE	BY	CHKD	APPR	QP. APPR	DATE
NONE	MRH		-	-	07-08-92
SERVICE CENTER LOCATION			SC-DWG NUMBER		REV. NO.
MEDLEY, FL.			GDPB200		A



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SAFETY-KLEEN CORP.
777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708-697-8460

SCALE	BY	CHKD	APPR	DP. APPR	DATE
NONE	MBH		-	-	07-08-92

SERVICE CENTER LOCATION: MEDLEY, FL
SC-DWG NUMBER: GDP8200
REV. NO.: A

safety-kleen

October 15, 1993

RECEIVED

OCT 19 1993

DEPT. OF ENV. PROTECTION
WEST PALM BEACH

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

RE: Classification of Waste Streams, Safety-Kleen Corp., Medley, Florida; FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. (Safety-Kleen) has reviewed its current operations and determined that it is appropriate to manage two of its waste streams as transfer wastes. The two waste streams are Immersion Cleaner 609, which is being phased out and non-perchloroethylene dry cleaning wastes. These two waste streams are currently permitted waste streams. The appropriate pages of the permit application have been revised to reflect managing these two waste streams as transfer wastes.

In addition, Safety-Kleen is utilizing cyclonic filters with Premium Solvent. The cyclonic filters are placed in the dumpster mud drums. The appropriate pages of the permit application have been revised to reflect this change.

Table 1 provides instructions for updating the permit application. Four copies of the replacement pages are enclosed. Also enclosed is the required $250 modification fee.

If you have any questions or comments, please do not hesitate to contact me at (813) 682-8094.

Sincerely,

Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

pjh

Enclosure(s)

c: Robert W. Fox, P.E. - ERM
Cynthia Norton - ERM

13113.21/01/KM101593.LTR/2

129 S. KENTUCKY AVE, SUITE 701 LAKELAND, FL 33801 PHONE 813/682-8094 FAX 813/688-3683

TABLE 1

INSTRUCTIONS FOR UPDATING THE OPERATING PERMIT APPLICATION MEDLEY, FLORIDA FLD 984171694

Replace the following pages:

I.D.2-1 through I.D.2-5
Table I.D.3-1
II.A.4(b)-2
II.A.5-1 through II.A. 5-9
Table II.A.6-1
Table II.A.6-2
Table II.A.6-3
Table II.A.6-4
II.B.3-1 through II.B.3-4

ATTACHMENT I.D.2
DESCRIPTION OF FACILITY OPERATION

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 solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: petroleum-based solvents (Parts Cleaner 105, Premium Solvent, or Actrel®), and old and new formulations of immersion cleaner. The old formulation 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 formulation immersion cleaner is being marketed under the name #699 and will eventually replace the old immersion cleaner. The new solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidone dipropylene glycol methyl ether, monoethanolamine and oleic acid. The waste contains a maximum of one percent total chlorinated solvents.

The solvents are distributed and collected by Safety-Kleen service representatives. Containers are transported in specially-equipped, enclosed route trucks. Clean parts washer solvents are distributed from and used parts washer solvents returned to the Service Center where the parts washer solvents are stored in separate tanks for the clean and used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) bulk storage. Used parts washer solvent 105 is manifested from the customer as hazardous waste. Used Actrel® is manifested from the customer as hazardous waste unless the generator's hazardous waste determination indicates it is non-hazardous, in which case, the used Actrel® would only become hazardous once it is mixed in the used parts washer solvent tank. Safety-Kleen may accept waste "Premium Solvent" at the Medley service center. The waste "Premium Solvent" will be mixed in the wet dumpster (solvent return receptacle), located in the return/fill area, when it arrives at the service center. The spent premium solvent is transported from the customer in accordance with the customer's hazardous waste determination pursuant to 40 CFR 262.11. Warehouse space is provided for the storage of both clean and used immersion cleaner containers. Immersion Cleaner #609 is managed as a transfer waste. The clean Premium Solvent and Actrel® are also stored in containers in the warehouse. Safety-Kleen leases parts washing equipment, including partially filled 5-, 16-, and 30-gallon containers, 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.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the branch to deliver a load of clean solvent and pick up a load of used solvent (Parts Cleaner 105, Premium Solvent and Actrel®). Parts washer solvents (used and fresh) are transported in bulk tank trucks between the branch and the recycle facilities. Clean Premium Solvent and Actrel® are transported in containers and may be transported in bulk tank trucks. Used parts washer solvent is transported in containers from the customer to the branch, where it is added to the used parts washer solvent tank. The Immersion Cleaner remains in the covered containers during transfer between the Service Center and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is parts washer solvent, 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 for redistribution to customers. The small quantities of residue remaining in the storage tanks at the Service Center 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 Florida Department of Environmental Regulation (FDER) definition, however, these centers are considered to be the waste generator.

Safety-Kleen also provides a dry cleaning waste reclamation service where containers 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. Perchloroethylene dry cleaning waste is managed as a permitted waste. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

In addition, Safety-Kleen provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are stored at the service centers. These wastes are periodically shipped to a reclaimer, and the regenerated solvent is distributed to Safety-Kleen customers for use as a product.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products (FRS) similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. The FRS wastes will be managed as transfer wastes. The manifest will not be terminated at the service center. These products may or may not have originally been obtained from Safety-Kleen by the industrial customer. Examples of the types of waste that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.

center for processing. The filters from the Actrel® system will contain approximately the same constituents as dumpster mud.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of the carboy are pumped into a tanker truck or into containers by a Safety-Kleen sales representative. At the service center, it is then pumped into a 20,000-gallon storage tank (if handled in bulk) or placed in the container storage warehouse (if handled in containers) for shipment to a Safety-Kleen recycle center.

Safety-Kleen also collects used oil filters and oily water. These materials are generally not hazardous wastes. The used oil and oily water may be managed in either drums or bulk tanks.

TABLE I.D.3-1
SAFETY-KLEEN CORP.
MEDLEY, FLORIDA
PART 1 ATTACHMENT

Waste Type	Process Code(s)	Estimated Annual Amounts (Tons)	Waste Codes
Spent Parts Washer Solvent*	S01** S02***	813	D001 and D-Codes Listed in Note Below
Dumpster Sediment	S01**	Included Above	D001 and D-Codes Listed in Note Below
Tank Bottoms	S01**	Included Above	D001 and D-Codes Listed in Note Below
Spent Ethylene Glycol	S01** S02****	5,000	D-Codes Listed in Note Below
Spent Immersion Cleaner (Old Formula) IC609	S01*****	28	F002, F004, and D-Codes Listed in Note Below
Spent Immersion Cleaner (New Formula) IC699	S01**	Included Above	D-Codes Listed in Note Below
Dry Cleaning Waste (Perchloroethylene)	S01**	350	F002 and D-Codes Listed in Note Below
Dry Cleaning Waste (Non-perchloroethylene)	S01*****	Included Above	D001 or F002 and D-Codes Listed in Note Below
Paint Waste	S01**	69	D001, F003, F005 and D-Codes Listed in Note Below
Fluid Recovery Service (FRS) Waste	S01*****	250	D001, D002, and D-Codes, F-Codes, K-Codes, and U-Codes Listed in Note Below

NOTES:

D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

* Spent Parts Washer 105 and Actrel® are transported from the customer to the Service Center as a hazardous waste unless the generator's hazardous waste determination indicates that it is non-hazardous. Spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

** These wastes will be stored in containers in the container storage area. The maximum drum capacity in the container storage area for hazardous waste and product is 29,400 gallons with 6,912 gallons being waste.

*** The spent parts washer solvent storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

**** The spent ethylene glycol storage tank has a capacity of 20,000 gallons and may be filled up to 19,000 gallons.

***** These wastes are transfer wastes.

Premium Solvent, and Actrel®) from the wet dumpster flows into a 20,000-gallon aboveground tank for storage. Used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers clean parts washer solvent. The sludge in the wet dumpster is cleaned out at least once per working day, containerized in satellite accumulation drums next to the wet dumpster units, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation. Satellite accumulation of parts washer solvent occurs in the return/fill area. These satellite accumulation points are associated with the operation of the dumpsters.

The immersion cleaner remains in covered containers at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility. Immersion Cleaner #619 is managed as a transfer waste and may be stored onsite for up to 10 days.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. The still bottoms, powder residue, and filters are packaged on the customer's premises in containers. All containers are DOT-approved. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The antifreeze waste is approximately two-thirds water and one-third antifreeze (ethylene glycol) and contaminants. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of the carboy are pumped into a tanker truck or containers by a Safety-Kleen sales representative. At the service center, they are then pumped into a 20,000-gallon storage tank (if handled in bulk) or placed in the container warehouse (if handled in containers) for shipment to a Safety-Kleen recycle center. Tanker truck to tanker truck transfers of waste antifreeze are conducted at the return/fill shelter when the antifreeze tank is shut down.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes),

ATTACHMENT II.A.5
WASTE ANALYSIS REPORT

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

1. The used Parts Cleaner 105 returned from customers in separate containers, transferred, and stored in the aboveground tank awaiting shipment to the recycle facility, is considered to be an Ignitable Waste (D001). Used Actrel® and Premium Solvent are considered non-ignitable. The used Parts Cleaner 105 and used Actrel® are considered characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). Used parts washer solvent 105 is manifested from the customer as a hazardous waste. Safety-Kleen may accept waste "Premium Solvent" at the Medley service center. The waste "Premium Solvent" will be mixed in the wet dumpster (solvent return receptacle), located in the return/fill area, when it arrives at the service center. The spent premium solvent is transported from the customer in accordance with the customer's hazardous waste determination pursuant to 40 CFR 262.11. Used Actrel® is manifested from the customer as a hazardous waste unless a generator's hazardous waste determination indicates that it is non-hazardous, in which case it will be managed as a non-hazardous waste until it is placed in the used parts washer solvent tank at which time it will be a hazardous waste.

2. The used chlorinated solvent #609 (old), returned from customers in separate containers and remain in the same container 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 (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). This waste is managed as a transfer waste.

3. The used immersion cleaner #699 (new), returned from customers in separate containers and remaining in the same container for shipment to the recycle facility, is considered a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

4. Parts washer solvent dumpster mud and tank bottom sludge, which will accumulate in the solvent return receptacles (wet dumpsters) and in the sludge tank, are considered to be an Ignitable Waste (D001) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). Other parts washer solid debris, such as metal parts and filters, are considered a characteristic waste only by TCLP.

5. Dry cleaning wastes will consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. While approximately 80 percent of the dry cleaning solvent returned by Safety-Kleen customers will be perchloroethylene (F002) and a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), approximately 17 percent is mineral spirits (D001), and a characteristic waste by TCLP ((D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043), and the remaining 3 percent is trichloro-trifluoroethane (F002) and a characteristic waste by TCLP leaching procedure ((D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

6. Antifreeze waste is approximately two-thirds water with the remaining third being antifreeze (ethylene glycol) and contaminants. As a protective measure, the storage tank area for spent antifreeze will be permitted to store wastes with the following TCLP waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

7. Paint wastes will consist of various lacquer thinners such as acetone, isopropyl alcohol, methyl ethyl ketone, methyl isobutyl ketone, toluene, xylenes, and acetate compounds (D001, F003, and F005) and is a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste will be collected in containers at the customer's place of business and the containers will then be palletized whenever possible and stored in the paint waste storage area of the accumulation center.

8. Due to the great variability in the composition of Fluid Recovery Service (FRS) wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. The FRS wastes are handled as transfer wastes only.

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

USED PARTS WASHER SOLVENT

The clean parts washer solvent is labeled under the trade name of "Safety-Kleen 105 Solvent," or parts washer so-named because of the flash point of the solvent being 105°F (minimum), Premium Solvent has a flash point of 148°F or higher, Actrel® has a flash point of 212°F. Chemically, the solvent primarily consists of petroleum hydrocarbon fractions with a boiling point image 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. Mineral spirits typically constitute at least 95% of the total volume of the Parts Cleaner 105 and Premium Solvent. The Actrel® solvent consists primarily of a paraffinic compound with C_{12} - C_{14} chains.

The used parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) consists primarily of parts washer solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) plus water, insoluble solids, oil, and grease picked up in the various degreasing operations that Safety-Kleen's customers use. 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 tank bottoms may range from 2 percent to 10 percent, by volume, in the used solvent. These tank bottoms are generated when the bulk tank is cleaned out. The used parts washer premium solvent is transported from the customer in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11.

The premium solvent and Safety-Kleen's existing parts washing solvent 105 are very similar in nature, both being predominantly mineral spirits. The Actrel® solvent is a paraffinic compound with C_{12} - C_{14} chains. The Premium Solvent has a flash point of 148°F and Actrel® has a flash point of 212° and are therefore not ignitable. Our preliminary data from other facilities indicates that the used premium solvent is not toxicity characteristic leaching procedure (TCLP) hazardous. The Actrel® solvent is presumed to be TCLP hazardous unless a generator's hazardous waste determination indicates otherwise.

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

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 and will eventually replace the #609 immersion cleaner. 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.

Both the new and old used immersion cleaner are basically unchanged from their clean state, except oils, greases, and insoluble solids may be picked up during the various degreasing operations used by Safety-Kleen's customers. The spent solvent is non-flammable. It is regarded as toxic because it contains various toxic chemicals (see MSDSs in Attachment II.A.4(b)).

USED PARTS WASHER SOLVENT BOTTOM SLUDGE

This is material settled from used parts washer solvent in the aboveground tanks. It contains insoluble solids, oils and greases, and some water picked up in the degreasing operations, together with a small amount of parts washer solvent. Analyses have shown that the sludge is an ignitable waste and some TCLP analyses have shown it to be toxic using TCLP standards while others have not. The same analyses applies to tank bottoms as applies to dumpster mud.

The sludge is removed from the aboveground tank periodically, put into satellite accumulation drums next to the wet dumpster units, stored as permitted waste, and shipped to Safety-Kleen's recycle facility for reclamation. The estimated annual quantity is included in the estimate of used parts washer solvent.

USED PARTS WASHER SOLVENT DUMPSTER MUD

This waste material is accumulated in the wet dumpsters when emptying the used parts washer solvent from the containers into the aboveground storage tanks. Filters from parts washer units utilizing Actrel® or Premium Solvent may also be added. The nature of this waste is similar to the used parts washer solvent bottom sludge, except with some small metal parts and less parts washer solvent. 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 containerized and shipped to Safety-Kleen's facility for recycling. Approximately 150 containers (1,500 gallons) of dumpster mud is anticipated to 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.

1. 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.

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 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.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. These wastes are deposited into a carboy or containers by the customer, on the customer's premises, and the carboy is pumped into a tanker truck or containers by the sales representative. At the service center, it is then pumped into a 20,000-gallon storage tank (if handled in bulk) or placed in the container warehouse (if handled in containers) and held for shipment to a Safety-Kleen Recycle Center.

PAINT WASTES

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in the container storage area of the warehouse.

FLUID RECOVERY SERVICE WASTES

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. These wastes are handled as transfer wastes at the service center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.

2. Lubricating, hydraulic oils, and machine oils.

3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.

4. Photographic and x-ray related wastes.

5. Paint and lacquer thinners and paint wastes.

6. Other hazardous and non-hazardous halogenated and non-halogenated wastes.

7. Waste cartridge filters from Parts Cleaner 105 or Premium Solvent.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes, non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes, commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program.

Certain other wastes that result from the use of organic solvents are also managed through the service centers. These include the solids and sludges that settle out of the used solvent during handling and processing. Lint, paper, oils, greases, carbons, and metals are examples of materials which may settle or separate out of used solvent. In addition to the listed waste codes, these wastes may also exhibit a characteristic under the toxicity characteristic leaching procedure.

Certain solvents are not economically recoverable in their prime form. These are typically solvents of low intrinsic value (e.g., methanol), those where the user's specifications are unattainable or where the mixture cannot be efficiently separated because of the formation of azeotropes, overlapping or close boiling ranges. However, when properly blended and processed, these solvents can be a beneficial source of energy. The Safety-Kleen recycle centers are equipped to process non-recoverable solvent mixtures with still bottoms from recovery of their solvent to produce valuable solvent based fuels.

In each of these end use applications at facilities classified as Industrial Furnaces, the combustion conditions are orders of magnitude more destructive than those specified for incinerators. For each industrial furnace emission controls are in place and covered by existing regulations. Specifications are restrictive for polychlorinated biphenyls (PCBs),

herbicides, pesticides, etc., and for other wastes that might adversely affect the operation of the unit or the properties of the finished product.

TABLE II.A.6-1
PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION

	Hazardous Waste	Parameter[a]	Rationale
1.	Used Immersion Cleaner (699IC)	TCLP	May contain these compounds
2.	Used Parts Washer Solvent	Flash Point TCLP	Ignitable characteristics D001; may contain these compounds
3.	Parts Washer Solvent 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)
4.	Parts Washer Solvent 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)
5.	Dry Cleaning Wastes	Perchloroethylene TCLP	Contain ingredient of F002 or contains a hazardous constituent. Perchloroethylene formula is the only waste managed as a permitted waste.
6.	Paint Wastes	Toluene, Xylene, Methyl ethyl ketone, Methyl isobutyl ketone, Acetone, Isopropanol, Methanol, Ethanol, Normal butyl acetate, Isobutyl acetate, Cadmium, Chromium, Lead	Contains these components: F003, F005, D001, D006, D007, and D008
7.	Spent Antifreeze	TCLP	May contain these compounds

FOOTNOTE:

[a] TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.

TABLE II.A.6-2

PARAMETERS AND TEST METHODS

Parameter	Test Method	Reference
pH	pH Meter	EPA 9045/SK9906
Flash Point	Tag closed cup tester	EPA 1030/SK9401
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
Specific Gravity	Meter	ASTM D 891/SK9903

TABLE II.A.6-3

METHODS USED TO SAMPLE HAZARDOUS WASTES

Hazardous Waste	Reference for Sampling	Sampler	Description of Sampling Method
1. Used Immersion Cleaner (699IC)	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 Parts Washer Solvent	Sampling a tank "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA/600/2-80/018	Same as 1	For tanks--Bomb sampler (similar to weighted bottle sampler)
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Same as 2	Same as 2	Same as 2
4. Parts Washer Solvent Dumpster Mud	Same as 1	Same as 1	Same as 1
5. Dry Cleaning Wastes	Same as 1	Same as 1	Same as 1
6. Paint Wastes	Same as 1	Same as 1	Same as 1
7. Spent Antifreeze	Same as 1 or 2	Same as 1 or 2	Same as 1 or 2

TABLE II.A.6-4

FREQUENCY OF ANALYSIS

Hazardous Waste	Frequency[a]
1. Used Immersion Cleaner 699	Gas chromatograph annually TCLP annually
2. Used Parts Washer Solvent	Gas chromatograph annually Flash point annually TCLP annually
3. Parts Washer Solvent, Tank Bottom Sludge, and Free Water	Gas chromatograph annually TCLP annually
4. Parts Washer Solvent Dumpster Mud	Gas chromatograph annually TCLP annually
5. Dry Cleaning Wastes	Gas chromatograph annually TCLP annually
6. Paint Wastes	Gas chromatograph annually TCLP annually
7. Spent Antifreeze	Gas chromatograph annually TCLP annually

[a] 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.

ATTACHMENT II.B.3
WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are compatible with each other and with other materials to be handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. However, they are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and fresh solvents is a standard practice at the facility.

All materials are managed in accordance with the local fire protection code and fire department requirements. Safety-Kleen uses a container color scheme as part of its waste management system. Eighty-five gallon overpack containers are used for the management of containers whose integrity has been compromised.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle center. Immersion Cleaner #609 is managed as a transfer waste.

The dry cleaning wastes are contained in containers. All containers are DOT-approved. These containers are managed similarly to the used immersion cleaner containers and contents within the containers are not removed or processed at the facility. Non-perchloroethylene dry cleaning wastes are managed as transfer wastes.

The parts washer solvents are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter. Spent antifreeze is packaged in containers, and the containers are not opened at the facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are palletized and stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility as transfer wastes under the FRS program. The FRS wastes are clearly delineated from the permitted wastes. An area for the temporary storage of FRS wastes is marked off using a chain and/or stantions. No other wastes are placed in the designated transfer areas. See Figure II.B.1-1.

The containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications. Tables II.B.3-1 through II.B.3-7 provide typical construction specifications of the containers.

Wastes are stored in polyethylene and steel containers. Since none of the waste handled by Safety-Kleen reacts with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

POTENTIAL FIRE SOURCES

The following is a list of fire prevention and minimization measures:

1. All wastes and products are kept away from ignition sources--Personnel must confine smoking and open flames to remote areas (e.g., the office or locker room), separate from any solvent. The parts washer solvent handling area and the aboveground storage tanks are separate from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

2. Ignitable wastes are handled so that they do not:
   a. Become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The parts washer solvent wastes are 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.

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

c. Produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See "a" above and "d" below.

d. Damage the structural integrity of the Safety-Kleen facility--The solvents stored at this facility do not cause deterioration of the tank, containers, or other structural components of the facility.

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 must be checked once per week and tested by the fire extinguisher company once per year.

EXTERNAL FACTORS

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the container storage area is in a building which is inaccessible to unauthorized personnel.

1. Vandalism--Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

2. Strikes--A strike would not result in a solvent spill or fire.

3. Power failure--A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.

4. Flooding--The site elevation is above the projected 100-year floodplain.

5. Storms or Cold Weather--The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather, or stormwater.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

ENFORCEMENT TELEPHONE LOG

CASE NAME: SAFETY-KLEEN/MEDLEY BOYNTON DATE: 7/13/95 TIME: 8:42 A.M

CONTACT: JOHN ERCOLE OF: SAFETY-KLEEN CALLED / WAS CALLED

PHONE: 407/734-2560

****

DISCUSSION: JOHN WAS CALLED TO INFORM HIM OF THE NEED TO FORMALLY WITHDRAW HIS PERMIT MODIFICATION REQUESTS FOR THE MEDLEY AND BOYNTON BEACH FACILITIES. HE HAS NOT FURNISHED A TIMELY RESPONSE TO THE FIRST NOTICE OF DEFICIENCY SENT TO SAFETY-KLEEN ON MAY 11, 1995.

JOHN WAS NOT AVAILABLE. A MESSAGE WAS LEFT ON HIS ANSWERING MACHINE WHICH DETAILED THE NEED TO FORMALLY WITHDRAW THE MODIFICATION REQUESTS FOR THE TWO FACILITIES. THOSE REQUESTS WERE RECEIVED MARCH 24, 1995.

PREPARED BY: KNOX MCKEE

Department of Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

MAY 11 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dade County
HW-Safety-Kleen Corp., Medley

Mr. Al Seyfer
Regional Sales Manager
Safety-Kleen Corporation
129 South Kentucky Ave., Suite 701
Lakeland, Florida 33801

Re: Dade County - HW; Safety Kleen Corporation's Request for Modification of Hazardous Waste Operating Permit, Safety-Kleen/Medley, HO 13-216311 (Submitted on March 24, 1995) for Closure of Waste Antifreeze Tank; First Notice of Deficiency

Dear Mr. Seyfer:

The Department has reviewed your request for modification, as referenced. The Partial Closure Plan addresses closure of a 20,000 gallon storage tank which had been permitted to store spent ethylene glycol. The Tank was never used for ethylene glycol storage and contains only a small amount of water left from hydraulic integrity testing. Also included in the request were updated emergency contacts. Listed below are items the Department considers deficient or in need of further explanation prior to granting the requested modification:

1. Page I.D.2-5. It is stated that Safety-Kleen began offering the service for the collection of spent antifreeze from automobile service stations. The wastes are reportedly placed into carboys or containers by the customer. The carboys or containers are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. At the service center, it is placed in the container storage warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen recycle center.

   There is no explanation how the contents of the carboys are actually characterized as either hazardous or nonhazardous. There is no explanation provided as to the safeguards that Safety-Kleen uses to prevent characteristically hazardous contents of a carboy

or container to be inadvertently managed as nonhazardous. Please explain the analytical review process Safety-Kleen uses to screen the spent antifreeze for RCRA metals and organic constituents. Please include discussion on the sample size, provisions made to insure that the sampling (number of samples taken and technique) offers a sound representation of the sample population. Provide an explanation of the statistical test employed and the level of significance by which the samples are compared.

3. Page II.A.4(b)-2. The general description of activities includes a presentation of the activities conducted at the Medley facility. It is stated that, at the service center, the tanker truck may transfer its waste to another tanker truck. Tanker truck to tanker truck transfers of waste antifreeze are conducted at the return/fill shelter or on any asphalt or concrete surface.

   Tanker truck to tanker truck transfers are permitted to be conducted only within those areas which have been provided with approved, satisfactorily designed and engineered secondary containment. The two areas at the Medley facility which are permitted for the truck to truck transfer are the sloped, truck loading area or within the return/fill shelter.

4. Page II.C.2-2. The transfer of ethylene glycol, from tanker truck to tanker truck, described is permitted only within the two areas of the facility as stated in item 3, above.

5. Page 3, Medley, Florida Service Center Closure Cost Estimate. Please review the closure cost estimate submitted using the applicable portions of the enclosed worksheets (assume a worst case scenario). Provide an adjusted closure cost estimate developed to satisfy the appropriate portions of the worksheets.

Should you have any questions, please contact Manuel Delosantos or Knox McKee of this office, telephone 407/433-2650.

Sincerely,

J. Knox McKee, Jr.
Supervisor, Hazardous Waste Section

cc: Satish Kastury, DEP/Tallahassee
Alan Farmer, EPA/Atlanta
Permitting File/WPB

I N T E R O F F I C E M E M O R A N D U M

Date: 18-Apr-1995 07:47am EST
From: Mary McGehee ORL
MCGEHEE_M@A1@ORL1
Dept: Central District Office
Tel No: 407/894-7555
SUNCOM:

TO: Douglas Outlaw TAL (OUTLAW_D@A1@DER)
TO: Ashwin Patel JAX (PATEL_A@A1@JAX1)
TO: Knox McKee WPB (MCKEE_K@A1@WPB1)
TO: Bill Kellenberger PEN (KELLENBERG_B@A1@PNS1)

CC: Bob Snyder ORL (SNYDER_B@A1@ORL1)

Subject: FWD: antifrz

Attached is the First NOD for the Safety Kleen Antifreeze Tank Closure. A brief summary of their permit modification includes:

1. Removing any remaining waste antifreeze and or sludge left in the 20,000 gallon storage tank prior to implementing the closure plan. This material will be manifested as hazardous waste to one of Safety Kleen's recycling centers for reclamation or another permitted treatment/disposal facility.

2. Safety Kleen has verified there are no cracks, fissures, excessive settlement, or other indications of secondary containment failure. We recently inspected the facility, there were no signs the secondary containment has been compromised. They have not had a release in the secondary containment area and will decontaminate this when they close the waste solvent tank, checking for all the constituents listed in the waste solvent and waste antifreeze storage tanks.

3. After all the residual waste is removed, the tank and ancillary piping will be cleaned using a high-pressure washer with an aqueous detergent solution. The tank and piping will then be triple rinsed in order to remove residual material from the walls, roof and floor of the tank and the interior of the piping.

4. The wash water and rinseate will be pumped out of the tank and collected. Wash water and rinseate will be either characterized and disposed of properly or manifested as a hazardous waste and transported to a properly permitted hazardous waste treatment/disposal facility.

5. Water from the final rinse will be collected and analyzed for the constituents listed in a table (all the permitted hazardous waste codes). Results of the analysis of the final rinseate sample must be below MCLs, or if MCLs are not available PQLs. If results of the analysis of the final rinseate sample are above the values listed, the tank will be cleaned and/or rinsed again. The rinseate will again be

tested...

6. Safety Kleen's closure cost estimate totals $7,876. Decontamination of Tank System & Decontamination of Equipment include a breakdown of individual items such as: labor, equipment necessary, analytical sampling, disposal of rinseate. Also included in the closure cost estimate is a fee for preparation of the closure certification report.

7. Safety Kleen will submit the closure certification report from the owner and the independent P.E. within 60 days of completing closure activities.

8. The closure schedule for the antifreeze tank includes:

a.	Permit Modification from DEP	day 0
b.	Coordinate equipment/personnel/material	day 0-30
c.	Removal/disposal of final waste inventory	day 30-90
d.	Clean storage tank and piping	day 75-120
e.	Analysis of final rinseate samples	day 120-150
f.	Verbally notify DEP clean closure met, tank then will be used for product storage	day 150
g.	Compile closure certification and notify DEP of closure completion	day 150-240

Attached is the First NOD, please let me know if you have any recommendations or changes.

Thanks!

Mary

I N T E R O F F I C E M E M O R A N D U M

Date: 18-Apr-1995 07:39am EST
From: MCGEHEE M
MCGEHEE_M@MRGATE@ORL1
Dept:
Tel No:
SUNCOM:

TO: mcgehee_m@a1@ORL1

Subject: antifrz

April 19, 1995

Safety Kleen Corporation
129 S. Kentucky Avenue
Suite 701
Lakeland, Florida 33801

OCD-HW/P-95-0157

Attention: Mr. Al Seyfer

Seminole County - HW
Safety Kleen Corporation - (HOMO-266634)
Modification for Closure of Waste Antifreeze Tank
First Notice of Deficiency

The Department has reviewed Safety Kleen's modification (HOMO-266634) titled the Partial Closure Plan for Safety Kleen Sanford Service Center. This Partial Closure Plan addresses closure of the 20,000 gallon storage tank used to store hazardous waste antifreeze. Listed below are items the Department considers deficient or in need of further explanation.

1. Section 1.1 - Purpose and Scope, pg. 1-1 states: "This plan has been prepared in accordance with the Florida Department of Environmental Protection (FLDEP) Hazardous Waste Rules 17-730.260,1-5."

   Comment: The Hazardous Waste Rule sited has been renumber and is now 62-730, the rule sited should be corrected to reflect this.

2. Section 3.3 - Closure Performance Standards, pg. 3-6 states: "Clean levels for the rinseate will be based on MCL's or if MCLs are not available practical qualification limits (PQLs) as specified in Appendix IX of 40 CFR 264. MCLs or PQLs for all constituents of concern are listed in Table 3-2."

   Comment: The Maximum Contaminant Levels (MCLs) listed in Table 3-2 do not reflect the state standards or minimum criteria for G2 groundwater. In addition, some of the constituents listed in the table have a Practical Quantitation Levels (PQL) where the state has determined a MCL. The rinseate should be compared contaminant levels listed in the Florida Department of Environmental Protection Ground Water Guidance Concentrations, June 1994.

3. Section 5 - Closure Cost Estimate, pg. 5-1 states: "The cost estimate is based on the following assumptions: (1) The waste antifreeze has been removed and properly disposed prior to start of onsite closure activities."

   Comment: Dave Matousek, Branch Manager at the Sanford facility verified in a telephone conversation of April 12, 1995 there is approximately 300 gallons of waste antifreeze/sludge remaining in the storage tank. It is the Department's understanding that this material will be removed prior to implementation of the closure plan and transported as hazardous waste to a facility authorized to recycle or dispose of it.

Please contact Mary McGehee or me at (407) 894-7555 within 15 days upon receipt of this Notice of Deficiency to determime a date which will be convenient to discuss the items listed.

Sincerely,

Robert T. Snyder, P.E.
Program Manager
Hazardous Waste Section

RTS/mm

cc: Satich Kastury, FDEP
Doug Outlaw, FDEP
Alan Farmer, EPA Region IV
Rich Morris, Safety Kleen

VMSmail To information: or[redacted]:mrgate::"a1::mcgehee_m"

Department of Environmental Regulation

Routing and Transmittal Slip

To: (Name, Office, Location)

1. DAVID MASON
2. DEP / TALLAHASSEE
3. WASTE MANAGEMENT
4.

Remarks:

DAVID -

PLEASE FIND ATTACHED THE PAGES OF THE SAFETY-KLEEN/ MEDLEY PERMIT WHICH ARE APPLICABLE TO YOUR PURPOSE.

DOUG OUTLAW HAS A COPY OF THE PERMIT IN ITS ENTIRETY SHOULD YOU NEED IT.

THE MOD FOR SAFETY-KLEEN/ BOYNTON HAD NO BEARING ON ASSOCIATED COST ESTIMATES.

From: KNOX McKEE

Date 7/8/91

Phone SC: 232-2650

I N T E R O F F I C E M E M O R A N D U M

Date: 16-Nov-1993 04:16pm EST
From: Knox McKee WPB
MCKEE_K
Dept: Southeast District Offi
Tel No: 407/433-2650
SUNCOM: 232-2650

TO: See Below

Subject: Safety-Kleen/New Transfer Waste Streams
SAFETY-KLEEN/BOYNTON-MEDLEY

Satish-

A couple of comments regarding Victor's November 5, 1993 letter in which Victor voices the company's intention to receive additional waste streams:

1. The facility must insure that any and all additional waste streams are compatable with any and all waste streams with which they are to share secondary containment regardless whether the wastes are hazardous or "non-hazardus."

2. The facility must insure that the FRS waste does not exceed the permitted volumes of the secondary containment as permitted.

3. The facility should provide information concerning "non-hazardous sterilizing solutions from dental offices" to demonstrate whether it is or is not biohazardous waste and subject to the applicable requirements of Rule 17-712.

4. A minor (dependent upon proposed volumes, compatability, and biohazardous character) modification fee would be appropriate contrary to the facility's feeling. The fact that the wastes are to be managed as transfer wastes is secondary to the fact that they will be managed within a RCRA regulated/permitted facility and (in the case of the Southeast District) within a secondarily contained RCRA unit.

Thank you for passing our concerns on to the facility.

Distribution:

TO:	Satish Kastury TAL	(KASTURY_S @ A1 @ DER)
CC:	Michael Hatcher TAL	(HATCHER_M @ A1 @ DER)
CC:	Michael Redig TAL	(REDIG_M @ A1 @ DER)
CC:	Bill Kellenberger PEN	(KELLENBERG_B @ A1 @ PNS1)
CC:	Ashwin Patel JAX	(PATEL_A @ A1 @ JAX1)
CC:	Gary Santti TPA	(SANTTI_G @ A1 @ TPA1)
CC:	Bob Snyder ORL	(SNYDER_B @ A1 @ ORL1)

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P.O. Box 15425
West Palm Beach, Florida 33416

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3. Article Addressed to:

Mr. Victor D. San Agustin, P.E.
Regional Environmental Engineer
Safety-Kleen Corp.
129 South Kentucky Ave, Suite 70
Lakeland, FL 33801

4a. Article Number

P 876-590-366

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

10/18/97

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

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F.D.E.R., Southeast District
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West Palm Beach, Florida 33416

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3. Article Addressed to:

Mr. Victor L. Sanchez, P.E.
Regional Environmental Engineer
Safety-Klean Corporation
129 S. Kentucky Ave., Ste 701
Lakeland, FL 33801

4a. Article Number

P 876-590-365

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

10/12/93

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

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Knox McKee

STATE OF FLORIDA
Department of Environmental Protection
Southeast Florida District
Post Office Box 15425
West Palm Beach, FL 33416

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. William C. Crawford
Field Environmental
Safety-Kleen Corporation
129 South Kentucky Ave., Suite 701
Lakeland, FL 33801

4a. Article Number

P818 707 762

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

2/16/94

5. Signature (Addressee)

Ronnie Lindsey

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

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• Ms. Denise Holness (maxie) •

F.D.E.R., Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

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SENDER:

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- Complete items [illegible]d 4a & b.
- Print your name [illegible] address on the reverse of this form so that we can return this card to you.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
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I also wish to receive the follo[illegible]g services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Victor L. San Agustin, P.E.
Regional Environmental Engineer
Safety-Kleen Corporation
129 South Kentucky Avenue, Ste 701
Lakeland, Florida 33801

4a. Article Number
P 893-809-691

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11/29/93

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
Lonnie Lindsey

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JAN 10 1994
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WEST PALM BEACH

Print your name, address and ZIP Code here

Mr. Denise Holness

F.D.E.P., Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Complete items 3 and 4a & b.
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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. William Crawford
Field Environmental Tampa Region
Safety - Kleen Corporation
1209 South Kentucky Ave.
Suite 701
Lakeland, FL 33801

4a. Article Number
P 893-809-838

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
1/5/94

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
Louise Gridley

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