

FF-02/86

SAFETY-KLEEN CHRONOLOGICAL ENTRY FORM FOR FOLDERS

4039-158820

NO.	DATE	TO	FROM	REFERENCE
1 91	Nov 13	E. Jureczak SAFETY	S. Kastury dis. tall.	TC WORKSHOP
2 91	Nov 13	V. SANAGUSTIN SAFETY	S. Kastury dis. tall.	TC WORKSHOP
3 91	Dec 2	B. Crawford dis. tmp	V. Sanagustin SAFETY	CHANGE OF Sealant
4 91	Dec 3	L. Miloniano dis. tmp	C. McCord SAFETY	change of drum color code
5 91	Dec 10	S. Kastury dis. tall.	L. Miloniano dis. tmp	File copy of 3/91
6 91	Dec 17	V. SANAGUSTIN SAFETY	L. Miloniano dis. tmp	MODIFICATION FEE IS REQUIRED
7 92	Jan 2	EPA	L. Sharkey SAFETY	1990 waste minimization report
8 92	Jan 21	W. Crawford dis. tmp	V. Sanagustin SAFETY	Class I modifications to permit
9 92	Jan 21	V. Sanagustin SAFETY	L. Miloniano dis. tmp	acknowledging receipt of modif. program for
10 92	Jan 21	V. Sanagustin SAFETY	L. Clark dis. tall.	Part of liability insurance is OK
11 92	Jan 22	S. Kastury dis. tall.	B. Crawford dis. tmp	File copy of 9/92
12 92	Apr 1	FILE	V. Sanagustin SAFETY	Guides to waste minimization
13 92	Apr 1	FILE	V. Sanagustin SAFETY	waste minimization training program
14 92	Apr 2	S. Kastury dis. tall.	B. Crawford dis. tmp	File copy of 13/92
15 92	Mar 25	W. Crawford dis. tmp	V. Sanagustin SAFETY	notes of sealant for storage areas
16 92	Apr 9	R. Garrity dis. tmp	V. Sanagustin SAFETY	Permit modif. on vehicle - time to land waste
17 92	Apr 16	R. Garrity dis. tmp	L. Miloniano dis. tmp	approval of 10/92
18 92	Apr 16	V. Sanagustin SAFETY	L. Miloniano dis. tmp	modif. to floor coating & classify vehicle waste
19 92	Apr 22	C. Gertsch Truett Co	J. Russell dis. tall.	return of letter of credit
20 92	May 4	R. W. Wm. Schaefer SAFETY	L. Clark dis. tall.	Financial is OK
21 92	May 5	G. Kukulski dis. tmp	G. M. M. M. M. dis. tmp	Can't find files
22 92	May 11	B. Crawford dis. tmp	C. Emery dis. tmp	we found the missing files
23 92	May 12	I. Hodges dis. tmp	L. Miloniano dis. tmp	will begin review of work plan
24 92	May 12	S. Kastury dis. tall.	L. Miloniano dis. tmp	please review work plan
25 92	May 12	V. Sanagustin SAFETY	L. Miloniano dis. tmp	File of 10/92 for
26 92	May 22	B. Crawford dis. tmp	V. Sanagustin SAFETY	change in Spillwater Management
27 92	May 28	V. Sanagustin SAFETY	L. Miloniano dis. tmp	is min. mod. & not all revisions reviewed
28 92	May 28	S. Kastury dis. tall.	L. Miloniano dis. tmp	File copy of 25/92
29 92	Jun 8	R. Garrity dis. tmp	D. Bacon dis. tall.	is case # 40-1637 still active?
30 92	Jun 11	H. Burnham dis. tall.	L. Miloniano dis. tmp	case # 40-1637 is closed

FF-02/86

SAFETY - KLEED

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

H029-158820

NO.	DATE	TO	FROM	REFERENCE
30 92	Jun 4	B. Crawford du.tmp	V. San Agustin SAFETY	request modification to stormwater management
31 92	Jun 11	L. Milanian du.tmp	V. San Agustin SAFETY	fax of rainwater management changes
32 92	Jun 22	L. Milanian du.tmp	V. San Agustin SAFETY	hard copy of 31/92
33 92	Jun 8	V. San Agustin SAFETY	L. Milanian du.tmp	approval of modification
34 92	Jun 30	V. San Agustin SAFETY	L. Milanian du.tmp	classification of NOD items
35 92	Jul 30	S. Kastury du.tall	V. San Agustin SAFETY	Comments on trans. Station New Rules
36 92	Sept 16	File		industry meeting
37 92	Sept 28	L. Milanian du.tmp	V. San Agustin SAFETY	Fire sprinkler installation
38 92	Oct 8	T. Christen SAFETY	V. San Agustin SAFETY	transporter liability notification
39 92	Oct 14	S. Kastury du.tall	L. Milanian du.tmp	Fyi copy of 37/92
40 92	Oct 16	V. San Agustin SAFETY	S. Kastury DER-Tallah	Response to comments
41 92	Oct 16	V. San Agustin SAFETY	L. Clark DER-Tallah	Request to resubmit liability certificates of insurance on state forms
42 92	Oct 23	DER-Tampa	V. San Agustin SAFETY	Revised pages for Contingency Plan
43 92	Oct 23	DER-Tampa	V. San Agustin SAFETY	Copy of Contingency Plan & Closure Plan
44 92	Nov 12	L. Milanian DER-Tampa	V. San Agustin SAFETY	Storage Area (North Bld) discontinued use of hazardous waste
45 92	Nov 13	S. Kastury DER-Tallah	Scott. Fore SAFETY	Letter of Authorization
46 92	Nov 17	S. Kastury DER-Tallah	L. Milanian DER-Tampa	Fyi copy of 45/92
47 92	Nov 24	L. Milanian DER-Tampa	G. Minhaj DER-Ft. Myers	Fax transmittal for review & comments
48 92	Dec 4	V. San Agustin SAFETY	L. Milanian DER-Tampa	Response to 44/92
49 92	Dec 8	S. Kastury DER-Tallah	L. Milanian DER-Tampa	Fyi copy of 50/92
50 92	Dec 9	DER-Tampa	V. San Agustin SAFETY	Class I Modification & Information update
51 92	Dec 16	V. San Agustin SAFETY	L. Milanian DER-Tampa	Request for complete copy of the latest Training Program
1 93	Jan 13	G. Santti DER-Tpa	V. San Agustin SAFETY	Subpart BB Piping and Valve Schematic
2 93	Feb 8	D. Goff Hills Co. Fire Office	V. San Agustin SAFETY	Fire Suppression system installation
3 93	Feb 16	V. San Agustin SAFETY	W. Kutash DER-TPA	Response to letter of Jan 15, 1993
4 93	Feb 16	V. San Agustin SAFETY	L. Milanian DER-TPA	Fax copy of Stormwater Management
5 93	Mar 1	R. Clarke DER-Tallah	V. San Agustin SAFETY	Transfer facility annual update
6 93	Mar 8	B. Kutash DER-TPA	V. San Agustin SAFETY	Major and minor permit modifications
7 93	Mar 11	S. Kastury DER-Tallah	L. Milanian DER-TPA	Fyi - see 6/93
8 93	Mar 15	B. Kutash DER-TPA	V. San Agustin SAFETY	New solvent which SAFETY will provide customers
9 93	Mar 25	S. Kastury DER-Tallah	L. Milanian DER-TPA	Fyi - see 8/93
10 93	May 19	V. San Agustin SAFETY	R. Vanderslice DER-TPA	Installation of a stormwater treatment system ref: 13/93 file folder 6-j

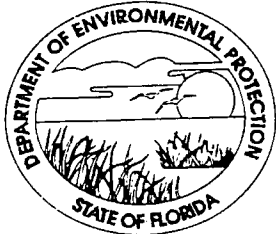
SAFETY - KLEEN

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FF-02/86

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

[illegible]



Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

July 12, 1993

158820 6-6

Mr. James A. Davis
Safety Kleen Corp.
5309 24th Avenue South
Tampa, Florida 33619

Dear Mr. Davis:

re: 15 Gallon Spill, July 6, 1993
FLD 980847271

I have reviewed the report filed with this office subsequent the referenced spill. You are requested to submit copies of analyses of soil samples taken to confirm that all contaminated materials have been removed. In addition, you are requested to submit a copy of the Material Safety Data Sheet for the dye referenced in your letter. If you have any questions, please call me at 744-6100 ext. 383.

Sincerely,

Elizabeth Knauss
Environmental Specialist III

cc. Bill Crawford, Safety Kleen Corp.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *gs* Gary Santi, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *lyne 6/22*

DATE: June 22, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
New Product Parts Cleaner Modification "Actrel"

Attached, please find correspondence dated June 14, 1993 and submitted June 15, 1993 which is subject to the referenced permit. The package includes the following items:

1. One two page cover letter describing the new parts cleaner.
2. Narrative to be placed in the active application detailing the new proposed product "Actrel".

Should you have any comments, please provide your written response within thirty days.

Attachments

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

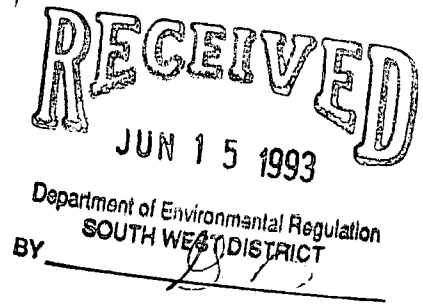
sktran.doc

June 14, 1993

VIA FEDERAL EXPRESS



Ms. Lynn Millanian
Florida Department of
Environmental Regulation
3804 Coconut Palm Drive
Tampa, Florida 33619-8318



RE: Minor Modification to the Operating Permit Application for Safety-Kleen Corp. Tampa,
Florida Facility; Facility No. FLD 980847271

Modified narrative PLACED IN APPLICATION
Dear Ms. Millanian:

~~4029-158820~~

Safety-Kleen Corp. (Safety-Kleen) has recently obtained the rights from Exxon Corporation to market Exxon's Actrel® parts cleaner. This cleaner is similar to the parts washer solvents which are currently marketed by Safety-Kleen. Actrel® has a flash point of 212° F and consists primarily of paraffin compounds with C₁₂-C₁₄ chains. The Actrel® will be provided to customers in a manner similar to the way parts washer 105 and premium solvent are provided. The Actrel® machine is equipped with a filtration system. Periodically (approximately every 4 to 8 weeks), a Safety-Kleen representative will service the parts cleaner. During servicing, the used parts cleaner filter is removed and placed in a plastic closed tube which is positioned inside the Actrel® drum. The Actrel® drum is replenished with Actrel® solvent and a clean filter. It is currently anticipated that the Actrel® solvent will require replacement at the customer location two times per year. At the time of replacement, the used Actrel® will be poured into the wet dumpster at the branch; thereby being added to the Used Parts Washer Solvent Tank. The spent filters will be placed in the waste sludge accumulation container located at the wet dumpsters.

The Actrel® solvent will be managed as a hazardous waste unless a hazardous waste determination has been made which indicates that the waste is non-hazardous. It is not anticipated that this material will be a D001 waste.

In addition to the Actrel® modification, Safety-Kleen is also making a modification to its waste acceptance criteria for used parts washer solvent. Safety-Kleen has revised the acceptance criteria relative to color as follows:

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent (Parts Cleaner 105 and Premium Solvent) has a greenish tint. The Actrel® parts cleaner is colorless. As the solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is used, it turns color. The specific color which the solvent turns is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops turns brown or black, while solvent used by silk screeners will turn the color of the inks (red, blue, pink, green, etc.). If the spent solvent color does not appear to be consistent with the type of equipment being cleaned, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

13112.00/01/ACTREL.PF1/6

Ms. Lynn Millanian
June 14, 1993
Page -2-

The attached pages reflect the addition of this product line to Safety-Kleen's operations. Instructions for updating the permit application are attached. The required \$250.00 minor modification fee is included.

If you have any questions, please call me at (813) 682-8094.

Sincerely,



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

/pjh

Enclosure(s)

c: Mike Hatcher - FDER, Tallahassee (ltr only)
Cynthia Norton - ERM
Mike Redig - FDER, Tallahassee (ltr only)



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Virginia B. Wetherell, Secretary

May 19, 1993

Mr. Victor L. San Augustin, P.E.
Regional Environmental Manager
Safety-Kleen Corporation
Tampa Region
129 South Kentucky Avenue
Suite 701
Lakeland, FL 33801

Re: Installation of a Stormwater Treatment System at the
Safety-Kleen Corporation Facility in Tampa, Florida

Dear Mr. San Augustin:

On April 29, 1993, the Department received your letter of April 28, 1993 concerning the above referenced facility. Based upon our review of the project details and the site visit that was conducted by my staff on May 13, 1993, the Department has determined that an Industrial Waste permit is required to construct this potential pollution source (Section 17-4.030, F.A.C.).

Please prepare and submit four (4) copies of a completed Industrial Waste application form along with appropriate fee (\$2500.00) to the Department's Southwest District office for processing within thirty (30) days from the receipt of this letter.

If you have any questions please contact Mohammad Abukudair, P.E., at (813) 744-6100, ext. 400.

Sincerely,

Robert K. Vanderslice, P.E.
Supervisor
Industrial Wastewater Program

SZ/mas

cc: ✓ Lynn Milanian, FDER-RCRA
Industrial Waste Section, EPCHC

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation *LS*

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 3/25*

DATE: March 25, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Tampa Service Center
Premium Solvent

----- *6-9* -----
Attached, please find correspondence dated March 12, and submitted March 15, 1993 which is subject to the referenced permit. The package includes the following items:

1. One two page cover letter discussing the usage of a new solvent.
2. One package to be placed in the active application detailing the new solvent.

Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



Sent Via Federal Express Mail

March 12, 1993

Mr. Bill Kutash,
Waste Program Administrator
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

RECEIVED
MAR 15 1993

Department of Environmental Regulation
SOUTH WEST DISTRICT

RE: Safety-Kleen Corp. Premium Solvent, Tampa, Florida; FLD 980847271

Dear Mr. Kutash:

Safety-Kleen Corp. (SK) has recently submitted a minor modification for the above-referenced facility. This minor modification describes the new solvent which SK will be providing to its customers. We are providing this product to our customers because we believe it results in a significant waste minimization potential. The premium solvent and SK's existing parts washing solvents 105 and 140 are very similar in nature, all three being predominantly mineral spirits. All three solvents are used for the same purpose and in a similar manner. However, premium solvent has a flash point of 148°F and is therefore not ignitable. Our preliminary data from other facilities indicates that the used premium solvent is not toxicity characteristic leaching procedure (TCLP) hazardous.

SK is just beginning to market this solvent on a national basis; however, the solvent 140 has been on the market for some time. Therefore, SK is using the existing data from solvent 140 to assess the toxicity characteristic leaching procedure (TCLP) potential for premium solvent. The attached tables indicate the results of a solvent 140 analysis program.

Based on this information, SK intends to transport the premium solvent from the customer to the service center as non-hazardous. Due to the high mineral spirits content of both parts washer 105 and premium solvent, the used parts washer 105 and premium solvent will be mixed in the bulk used parts washer tank at the service center. Once the premium solvent is placed in the tank system, it will be managed as a hazardous waste. As a part of the roll-out of this new product, SK will be doing extensive customer training and waste sampling to assure that the premium solvent waste stream is not hazardous prior to being mixed in the used parts washer solvent tank.

13113.19/01/BK031293.LTR/2

Mr. Bill Kutash
March 12, 1993
Page -2-

We are providing this information, along with a copy of the training video and generator certification which will be provided to our customers, for your use. The generator certification will be completed by the customer during every pick-up of used premium solvent. If you have any questions, please call me at (813) 682-8094.

Sincerely,



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

pjh/mm

Enclosure(s)

c: Beth Knauss
Mike Redig - FDER, Tallahassee
Gary Santti, P.E.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *JS* Gary Santi, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 3/11*

DATE: March 11, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Tampa Service Center
Major and Minor Permit Modifications

Attached, please find correspondence dated March 5, and submitted March 10, 1993 which is subject to the referenced permit. The package includes the following items:

1. One two page cover letter indicating changes to the permit.
2. One two inch thick package to be placed in the active application.

Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc

- Prepare a Public Notice / radio broadcast, cover memo for Rick & Signature Letter
- ✓ MAKE sure to incorporate all new SWD cond. generated during Laidlaw Clrwt's HO renewal - As well as transfer station R



D. E. R.

MAR - 8 1993

SOUTHWEST DISTRICT
TAMPA

158820

A029-227802

March 5, 1993

Mr. Bill Kutash
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: Major and Minor Permit Modifications; Safety-Kleen Corp., Tampa, Florida Facility,
FLD980847271

Dear Mr. Kutash:

Safety-Kleen Corp. is submitting four copies of a major and minor permit modification for the above referenced facility. The following details the modifications made to this permit application:

Minor Modifications:

1. A new parts washer solvent, Premium Solvent, has been added to the product list. This new solvent is a petroleum based product. The waste from this solvent will be stored in the facility's permitted storage tank. (aka solvent 140)
2. Due to the use of the new part washer solvent, the term mineral spirits, when referring to the waste stream has been changed to parts washer solvent. This term "used parts washer solvent" includes both part washer solvent 105 and Premium solvent.
3. Safety-Kleen has changed the name of the accumulation center to an operations center. The operations center has assumed responsibility for all waste management at the facility. This was changed throughout the permit application.
4. The term drum has been changed to container throughout the document.
5. Attachment II.B.3 has been revised to identify that the specifications provided will no longer apply as of the effective date of the DOT rule changes. change permit reference to application tables II.B.3-1 thru II.B.3-7
6. Updated Waste Analysis Plan to better describe the qualitative analysis performed by Sales Representatives.

13112.19/01/BK030593.LTR/5

\$1000
for mod 5

7. Updated training program to clarify training procedures.

Major Modifications:

1. Clarification of the types of transfer ^{Identify transfer station wastes in the permit.}wastes which may be managed at the facility has been included. These wastes are part of the Fluid Recovery Service (FRS) program offered by Safety-Kleen.
2. Clarification of the facility to hold waste ethylene glycol in tanker trucks as transfer waste.

Due to the large number of sections which required modification, Safety-Kleen is providing entire new documents to Florida Department of Environmental Regulation (FDER). Table 1 indicates what changes were made to various sections. FDER will need to retain certain items from the original documents. These items are listed in table 2.

A \$1,000 modification fee is also included with this submittal.

If you have any questions, please contact me at (813) 682-8094.

Sincerely,



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

mmm/pjh

Enclosure(s)

c: B. Knauss - SW, FDER
L. Milanian - SW, FDER
C. Norton - ERM



February 26, 1993

Sent Via Federal Express
Mail-Airbill # 6915820424

Mr. Raoul Clarke
Hazardous Waste Management Program
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

D. E. R.

MAR - 1 1993

RE: Safety-Kleen Corporation, ILD 051 060 408
Transfer Facility Annual Update

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Clarke:

Enclosed please find the Transfer Facility Annual Update for the Safety-Kleen Corporation facilities located in the state of Florida. The submittal of this update is required by 17-730.171(3) Florida Administrative Code, and is submitted on DER Form 17-730.900(6). The form is submitted for the following facilities:

Safety-Kleen Corporation,	Orange Park
Safety-Kleen Corporation,	Tallahassee (Active)
Safety-Kleen Corporation,	Tallahassee (Inactive)
Safety-Kleen Corporation,	Boynton Beach
Safety-Kleen Corporation,	Delray Beach (Inactive)
Safety-Kleen Corporation,	Medley
Safety-Kleen Corporation,	Miami (Inactive)
Safety-Kleen Corporation,	Altamonte Springs
Safety-Kleen Corporation,	Sanford
Safety-Kleen Corporation,	Tampa,
Safety-Kleen Corporation,	Port Charlotte

Should you have any question, please contact me at 813-682-8094.

Sincerely,

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

Enclosure(s)

cc: Mike Fitzsimmons, NE-FDER
Bill Kutash, SW-FDER
Tom Moody, P.E., NW-FDER

Bill Bostwick, P.E., CF-FDER
Phil Barbaccia, SF-FDER
Vivek Kamath, P.E., SE-FDER

STATE OF FLORIDA

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 17-730.171(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-730.171. All information must be typed or printed clearly.

I. Transporters Identification:

Company Name: Safety-Kleen Corporation

EPA ID No.: Current ILD 051 060 408, FLD 980 847 271, SCD 007 995 488
Future ILD 984 908 202, FLD 980 847 271, SCD 007 995 488

Company Mailing Address: Current: 777 Big Timber Road
Future: 1000 North Randall Road
Elgin, IL. 60123

Principal Contact: Victor L. San Agustin, P.E.

Phone Number: 813-682-8094

II. Transfer Facility Identification:

Name of Facility: Safety-Kleen Corporation

Street Address: 5309 24th Avenue South

Tampa, Florida 33619

Latitude: 27°55'21"N

Longitude: 82°23'40"W

County: Hillsborough

Waste Codes: SEE ATTACHED TABLE

Storage Volume: South Bldg. 12,749 gallons in flammable storage area and
44,367 gallons in non-flammable storage area, North
Bldg. 5,197 gallons (All are estimated maximum).

NOTE! Safety-Kleen Corporation transports materials using trucks based at various locations throughout the country and each location has a different US EPA ID number. In addition, other transport companies are periodically used. The transporters who will use this transfer facility include, but are not limited to those noted in item I above.

Note! Future US EPA ID number and address effective May 31, 1993.

III. Certification:

I CERTIFY UNDER PENALTY OF LAW THAT THE ABOVE INFORMATION IS ACCURATE AND COMPLETE. AS THE OWNER OR OPERATOR OF THE ABOVE REFERENCED HAZARDOUS WASTE TRANSFER FACILITY. I ALSO CERTIFY THAT THIS FACILITY IS IN COMPLIANCE WITH ALL PROVISIONS OF FAC. 17-730.171.

Victor L. San Agustin, P.E.
(Typed Name)

Regional Environmental Manager
(Title)

Victor L. San Agustin

(Signature of Authorized Representative)

02/26/93

(Date Signed)

Please complete this form and mail to the following address:

Florida Department of Environmental Regulation
Hazardous Waste Management Section
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Attached Table
Safety-Kleen Corporation
Transfer Facility Waste Codes**

D-Codes:

D001, D002, 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:

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

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.



October 30, 1992

Sent Via Certified Mail
No. P 516 713 055

Mr. Satish Kastury
Hazardous Waste Section
Bureau of Solid and Hazardous Waste
Florida Department of Environmental
Regulation - Tallahassee Office
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Letter of Authorization for
Safety-Kleen Permit Submittals

Dear Mr. Kastury:

Pursuant to General Condition 16.d. of our Florida permits,
all reports or information required to be submitted to the
Department by Safety-Kleen shall be signed by a person
authorized to sign a permit application.

Please accept this letter as Safety-Kleen's authorization to
allow the person listed below to sign off on reports or other
information submitted to the Department:

Victor L. San Agustin, P.E.
Regional Environmental Manager
Safety-Kleen Corp.
129 South Kentucky Ave.
Suite 701
Lakeland, FL 33801

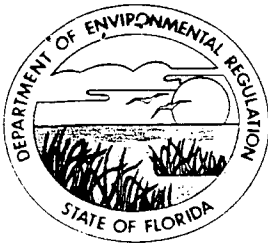
If you have any questions, please call Victor San Agustin at
(813) 682-8094.

Sincerely,

Scott E. Fore
Vice President -
Environmental, Health, and
Safety Department

cc: Allan Farmer, USEPA IV
Bill Kellenberger, NW-FDER
Ashwin Patel, NE-FDER
Gary Santti, SW-FDER

Bob Snyder, CF-FDER
Knox McKee, SE-FDER
Phil Barbaccia, SF-FDER



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

FEB 16, 1993

DATE

FAXED
2/16/93
1:45 pm

TO: V. SANDAUSTIN TOTAL PAGES: 5

DEPT: _____

PHONE: _____

FAX NUMBER: _____

FROM: L. MIKAMIAN

DEPT: _____

PHONE: 813-744-6100 SC 542-6100 FAX NUM. 813-744-6090 SC 542-6090

REFERENCE: _____

MESSAGE: As per your request:

1. stormwater memo
2. glycol policy

REPLY: _____

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

To: Jeff Schoenbacher
Compliance Enforcement Staff

From: Lynne R. Milanian
Permitting Staff

Date: January 25, 1993

Re: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit HO29 - 158820
Stormwater Management

Careful examination of the above facility management practices, operating permit authorizations and current Industrial Wastewater policy concerning "non-contact" stormwaters reveals that the following options are available to Safety-Kleen concerning management of stormwaters received within the tank farm berm.

Option 1 Contain the stormwaters and have them hauled off-site for proper disposal. This can be done by placing accumulated stormwaters directly in the waste mineral spirit tank or containing them in a separate unit.

Option 2 Release the stormwaters directly to the ground upon receipt of analysis for TRPH indicating that no petroleum residues are present. Documentation must be kept in facility operating log concerning the amount released, who released it, when released and analysis obtained.

Option 3 Construct a roof to minimize stormwater receipt and place any stormwaters entering the bermed area in the waste mineral spirit tank.

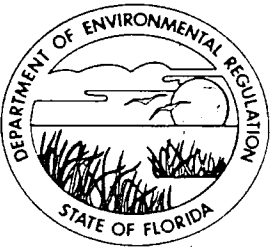
Option 4 Install a pretreatment system, which would include a sand filter and an activated carbon unit to process the stormwaters prior to release. Upon installation of system, treated stormwaters would have to be contained, and the effluent sampled for TRPH prior to release to verify successful decontamination. Annual analysis would then be required for TRPH to demonstrate that the system is still functioning.

Records would be maintained to track sand filter cleaning and activated carbon replacement.

Safety-Kleen may have an idea of their which they could certainly propose for Department approval.

I believe Safety-Kleen has been discharging "non-contact" stormwater from the tank farm for a year. If you are concerned that a release might have occurred you could request securement of a soil sample for analysis. Upon Safety-Kleen's selection of a new method to handle this stormwater, the appropriate permit modification will be made. During the interim, your report should confirm that the past method of disposal, i.e., directly to the ground as authorized in the permit, is no longer acceptable.

cc: Beth Knauss



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

February 16, 1993

Mr. Victor San Augustin
Regional Environmental Manager
Safety-Kleen Corporation
129 South Kentucky Avenue
Lakeland, Florida 33801

RE: Safety-Kleen Corp., Facility at 5309 24th Ave South, Tampa, FLD 980 847 271

Dear Mr. San Augustin:

This letter is in response to your letter of January 15, 1993.

Pursuant to Chapter 403.1655, Florida Statutes, and F.A.C. Chapter 17-107, the Department is authorized to respond to short-term emergencies involving a threat to or an actual contamination of surface and groundwater. Pursuant to Chapter 376.305, Florida Statutes, the Department may arrange for the removal of a pollutant if the responsible party fails to act. To accomplish this the Department has an employee on-call after regular working hours during the week and 24 hours on weekends and holidays. The on-call person can be reached by calling the State Warning Point at 904/488-1320. During regular working hours the emergency response section can be reached by calling the Southwest District office at 813/744-6100 or by calling the State Warning Point. Should an emergency situation occur the on-call employee will respond to the scene if necessary to advise Safety Kleen as to the appropriateness of their cleanup activities.

The District's Emergency Response Section does not maintain a copy of your contingency plan. The District's copy is maintained in the Hazardous Waste Section with your permit application, etc. Please send all updates of your contingency plan to the attention of the Hazardous Waste Program Manager who is currently Mr. Gary Santi.

Should you have any questions please contact Juliet Gross at 813/744-6100, ext. 379.

Sincerely,

William Kutash
Waste Program Administrator

JG:jtg

cc Gary Santi

LY N/A



D.E.R.

FEB 08 1993

SOUTHWEST DISTRICT TAMPA

February 4, 1993

Sent Via Facsimile and
Federal Express Mail -
Airbill No. 6915820531

Mr. Dan Goff
Hillsborough County Fire Marshall's Office
9225 Bay Plaza Blvd., Suite 701
Tampa, FL 33619

Subject: Fire Suppression System Installation
Tampa Facility, Hillsborough County
EPA ID No. FLD 980 847 271

Dear Mr. Goff:

The purpose of this letter is to provide an explanation as to why our Tampa facility is experiencing a delay in completing construction of its fire sprinkler system. It is our understanding that we could not obtain a certificate of occupancy from your office to occupy our newly completed second floor mezzanine because of this particular delay.

Specifically, we are experiencing a delay in the installation of a 87,000 gallon firewater tank and associated underground piping. Soil contamination was discovered at the location where these are to be situated. It appears the contamination is coming from constituents of asphalt laden products such as asphaltic concrete and roofing material which are present in the dirt.

Dirt must be excavated at the proposed location in order that a foundation for the tank can be placed. We are presently in the process of determining whether the dirt is a hazardous waste. Once this determination is made, a waste profile will be submitted to the appropriate land disposal facility for approval prior to commencement of excavation. Our initial estimates indicate that if the dirt is a hazardous waste, that approximately 600 cubic yards of dirt must be shipped as a hazardous waste at a cost of approximately \$200,000. Having to dispose of the dirt at this cost will force our company to look at other designs for the tank foundation to minimize dirt removal. If the dirt is non-hazardous, the dirt may be disposed of properly at minimal cost.

We expect to be able to complete our hazardous waste determination, receive waste profile approval, and commence excavation within a minimum of 45 days but no later than 60 days. If the material is non-hazardous, completed installation of the entire fire suppression system should be completed within another 60 days from the time we complete

our hazardous waste determination. If the waste is hazardous, we cannot at this time provide you an installation completion date.

I hope this letter addresses your Department's concerns about Safety-Kleen's sincere intentions to complete this project. The firewater tank and associated piping have already been ordered. We request your patience and understanding in this regard. We also request that your Department approve our certificate of occupancy for the new mezzanine.

If you have any questions, please call me at (813)682-8094.

Sincerely,



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

cc: Gary Santti, SWFDER
Lynn Milanian, SWFDER
Beth Knauss, SWFDER
Darlene Justice, HC Fire Dept.



D.E.R.

JAN 13 1993

January 12, 1993

SOUTHWEST DISTRICT TAMPA

SENT VIA FEDERAL EXPRESS
MAIL - January 12, 1993
Airbill #6097235185

Mr. Gary Santti, P.E.
Hazardous Waste Section
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

RE: Safety-Kleen, Corp., Tampa FLD 980 847 271
Operating Permit H029-158820
Subpart BB Piping and Valve Schematic

Dear Mr Santti:

Enclosed are three copies of the environmental piping schematic for the waste mineral spirits and proposed waste antifreeze tanks in the application for permit H029-158820 for the referenced facility. This page should replace the pages currently in the application.

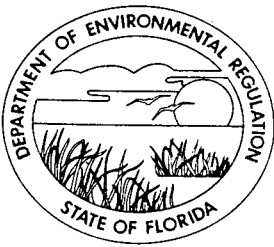
Please contact me at (813)682-8094 should you have any questions.

Sincerely,

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

Enclosure

c: C. Norton - ERM, South



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

DEC 16 1992

Mr. Victor L. San Agustin, P.E.
Regional Environmental Manager
Safety-Kleen Corporation
129 S Kentucky Avenue, Suite 701
Lakeland, Florida 33801

158820 6-8

RE: Safety-Kleen Corp., FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has carefully reviewed your latest submittal regarding modifications to your current operating permit. Attachment II. A.4(e) which details Safety Kleen's Training Program has undergone more than five revisions in the past year. The FDER is requesting that you provide one complete copy of the latest training program to this office, reflecting all these numerous changes, which will be incorporated into the active application. Our original application has lost much of its continuity as page sequence numbers are not in order.

Should you have any questions, do not hesitate to contact me at (813) 744-6100 extension 372.

Sincerely,

Lynne R. Milanian
Lynne R. Milanian
District Permitting Engineer
Hazardous Waste Section
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee

sklet.doc



RECEIVED
DEC 09 1992

December 8, 1992

Hazardous Waste Supervisor
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

Department of Environmental Regulation
SOUTH WEST DISTRICT
BY _____

RE: Class I Modification and Informational Update; Safety-Kleen Corp., Tampa, Florida;
FLD 980847271

INFO PLACED IN ACTIVE APPLICATION

Dear Sir or Madam:

Safety-Kleen Corp. is providing the following Class I modifications to the operating permit application for the above-referenced facility.

- Updated emergency contact lists;
- Updated emergency equipment locations and lists;
- Updated Subpart BB schematic drawing for pumps and flanges; and
- Revised job descriptions.

The job descriptions are being revised to address Safety-Kleen Corp. internal operational changes.

Safety-Kleen Corp. is providing four copies of the changed pages for the permit application. Table 1 provides instructions for updating the permit application.

If you have any questions, please contact me at (813) 682-8094.

Sincerely,

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

pjh

Enclosure(s)

c: Cynthia Norton - ERM

13113.19/01/HS120892.LTR/1

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 12/14*

DATE: *October 27, 1992*
Dec 8

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center
Submittal Concerning Modifications and Updates

Attached, please find correspondence dated December 8, 1992 and submitted December 9, 1992 which is subject to the referenced permit. The package includes the following items:

1. One cover letter requesting modifications to the operating permit.
2. Revised narrative to be placed in the original application.

Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

DEC - 4 1992

Mr. Victor L. San Agustin, P.E.
Regional Environmental Manager
Safety-Kleen Corporation
129 S Kentucky Avenue, Suite 701
Lakeland, Florida 33801

RE: Safety-Kleen Corp., FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center - North Storage Building

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has carefully reviewed your request to store non-regulated waste in the North storage building. As we discussed during our recent telephone conversation your proposal to utilize this drum storage area for product placement is acceptable. However, I clearly indicated that as this particular storage area is designated for hazardous waste management and described in the operating permit a note in the facility operating record must be kept. The record must state for each week that it was not necessary to perform the required container inspection for the North storage building as only products were stored therein. The record must be kept up to date and made available to authorized FDER officials.

Should you have any questions, do not hesitate to contact me at (813) 744-6100 extension 372.

Sincerely,

Lynne R. Milanian
Lynne R. Milanian

District Permitting Engineer
Hazardous Waste Section
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee
Beth Knauss, Supervisor, FDER - Tampa

sklet.doc

FAX TRANSMITTAL LETTER

DATE:

11/24/92

TO:

NAME:

Lynn Milanian

AGENCY:

DER Tampa

TELEPHONE NUMBER:

SC 542-6100

FAX #:

SC 542-6123

NUMBER OF PAGES (INCLUDING COVER SHEET):

3

FROM:

NAME:

Ghaus Minhaj

AGENCY:

DER - South Florida District, Fort Myers

TRANSMITTAL ON A CANON FAX 710: FAX NO.: (813) 332-5873

TELEPHONE NUMBER: (813) 332-6975, SC 748-6975

IF ANY OF THE PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY.

SENDER'S NAME:

Ghaus Minhaj

COMMENTS:

Please call me.



RECEIVED
NOV 4 1992
DER
SOUTH FLORIDA DISTRICT

November 3, 1992

Sent Via Federal Express
Mail-November 3, 1992

Mr. Philip Edwards
Director of District Management
Florida Department of Environmental Regulation
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901-3851

Re: Safety-Kleen, Corp. FLD 000 776 716
Port Charlotte, Florida
Operating Permit H008-178811

Dear Mr. Edwards:

As provided in section 17-730.290(c)(4) FAC., Safety-Kleen is requesting a Class 1 modification to the referenced permit. The modification involves a revision to page II.B.1-3 of the permit application.

Page II.B.1-3, as written, could create a conflict between the permit and the application. The conflict concerns the application statement to store waste for only 30 days instead of the normal 365 days. Safety-Kleen request that the application be modified to eliminate the 30 day storage restriction.

Attached are 4 copies of the revised page for insertion into the application. Safety-Kleen believes that this revision corrects a clerical error in the preparation of the application, and does not alter the operations of the facility. We understand that a fee for this type of revision is not required, however, should the District determine that a fee is needed, it will be provided immediately after notification.

Should you have any questions, please contact me at 813-683-8094.

Sincerely,

Victor L. San Agustin

Victor L. San Agustin

All drums are transported, moved, and stored carefully in an upright position. The route trucks are equipped with an electric hoist to assist loading/unloading. In the warehouse area, the immersion cleaner, mineral spirits dumpster mud drums, and dry cleaning waste drums are moved with two-wheel hand trucks and stacked by hand. All containers will be elevated on pallets to eliminate the possibility of them standing in spilled solvent.

Containers will be double-stacked. Figure II.B.1-2 shows the configuration and stacking arrangements of containers. The specific locations of various waste and product types have not been identified since the wastes are compatible with one another. For the ease of inventory control the wastes will be grouped. The only wastes which are to be stored in a specific location are the flammable wastes. As shown in Figure II.B.1-4, the five pallets located in the northeast and eastern portion of the container storage area meet the requirements for the 50-foot setback rule for the storage of ignitable wastes near the facility property line. Wastes will not remain onsite for more than 30 days.

All drums are transported, moved and stored carefully in an upright position. The route trucks are equipped with an electric hoist to assist loading/unloading. In the warehouse area, the immersion cleaner, mineral spirits dumpster mud drums, FRS, and dry cleaning waste drums are moved with two-wheeled hand trucks and stacked by hand. All containers will be elevated on pallets to eliminate the possibility of them standing in spilled solvent.

Containers will be doubled-stacked. Figure II.B.1-2 shows the configuration and stacking arrangements of containers. The specific locations of various waste and product types have not been identified since the waste are compatible with one another. For the ease of inventory control the waste will be grouped. The only waste which are to be stored in a specific location are the flammable wastes. As shown in Figure II.B.1-4, the five pallets located in the northeast and eastern portion of the container storage area meet the requirements for the 50-foot setback rule for the storage of ignitable waste near the facility property line.

RECEIVED

NOV 04 1992

D.E.R. SOUTH DISTRICT



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *js* Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *lynne 11/17*

DATE: November 17, 1992

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center
Submittal Concerning Signature Authorization

Attached, please find correspondence dated October 30, 1992 and submitted November 13, 1992 which is subject to the referenced permit. The package includes the following item:

1. One cover letter indicating the designated individual authorized to sign reports and other such permit related items on be-half of Safety-Kleen.

Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



October 30, 1992

Sent Via Certified Mail
No. P 516 713 055

Mr. Satish Kastury
Hazardous Waste Section
Bureau of Solid and Hazardous Waste
Florida Department of Environmental
Regulation - Tallahassee Office
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Letter of Authorization for
Safety-Kleen Permit Submittals

D. E. R.

NOV 13 1992

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Kastury:

Pursuant to General Condition 16.d. of our Florida permits, all reports or information required to be submitted to the Department by Safety-Kleen shall be signed by a person authorized to sign a permit application.

Please accept this letter as Safety-Kleen's authorization to allow the person listed below to sign off on reports or other information submitted to the Department:

Victor L. San Agustin, P.E.
Regional Environmental Manager
Safety-Kleen Corp.
129 South Kentucky Ave.
Suite 701
Lakeland, FL 33801

If you have any questions, please call Victor San Agustin at (813) 682-8094.

Sincerely,

Scott E. Fore
Vice President -
Environmental, Health, and
Safety Department

cc: Allan Farmer, USEPA IV
Bill Kellenberger, NW-FDER
Ashwin Patel, NE-FDER
Gary Santti, SW-FDER

Bob Snyder, CF-FDER
Knox McKee, SE-FDER
Phil Barbaccia, SF-FDER



November 12, 1992

Hand Delivered -
November 12, 1992

Ms. Lynn Milanian
Hazardous Waste Permitting
Florida Department of Environmental
Regulation - Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

D.E.R.

NOV 12 1992

SOUTHWEST DISTRICT TAMPA

Subject: North Building Storage Area (5,197 Gallons)
Tampa Service Center
EPA ID # FLD 980 847 271

Dear Ms. Milanian:

As we discussed last Friday, the purpose of this letter is to notify the Department that we have ceased use of the above mentioned drum storage area at this time for hazardous waste storage. This storage cage is presently being used for storage of Safety-Kleen's line of saleable products, also known as Allied Products. A few examples include clean immersion cleaner, floor soap, hand soap, aerosol cans, etc..

Safety-Kleen expects to use this storage area in this manner until further notice. We will notify the Department at least 15 days in advance of storing hazardous wastes if we decide to store such at this location in the future.

As discussed, this letter is also to notify the Department that since the storage unit will not be storing hazardous wastes, we will not be conducting the required inspections on this storage area as required under our current hazardous waste permit.

Per our discussion, it appears the Department has no objections to not inspecting this drum storage area during this time period. Please inform us in writing of the Department's position. If we do not receive a response from your office within 15 days of your receipt of this letter, we will assume that the Department agrees that inspections on this storage area do not need to be conducted.

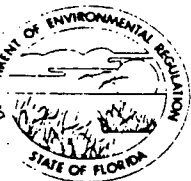
We hope the information in this letter is sufficient. If you have any questions or need further information, please call me at (813) 682-8094.

Sincerely,

A handwritten signature in cursive script that reads "Victor L. San Agustin".

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

cc: Beth Knauss, SWFDER
Gary Santti, SWFDER



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *JS* Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 10/27*

DATE: October 27, 1992

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center
Submittal Concerning the New Transfer Station Rules

Attached, please find correspondence dated October 23, 1992 and submitted October 23, 1992 which is subject to the referenced permit. The package includes the following items:

1. One cover letter requesting modifications to the contingency plan which includes details covering the transfer station operation.
2. Revised narrative to be placed in the original application.

Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



October 23, 1992

Hazardous Waste Supervisor
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

D. E. R.

OCT 23 1992

SOUTHWEST DISTRICT
TAMPA

RE: Safety-Kleen, Tampa, Florida
Transfer Facility, FLD 980847271

Documents Placed on Shelf in Attach. 6-C

Dear Sir:

Enclosed is a copy of the Contingency Plan and Closure Plan for the above-referenced facility. These plans are a part of the Hazardous Waste Operating Application for the above-referenced facility and address both permitted and transfer wastes. These documents are submitted for your information and fulfill the requirements of 17-730.171(2)(a) and (b). Safety-Kleen will update the plans in the permit application as needed. Safety-Kleen will not update the copies of the plan submitted with this letter but will refer the reader to the operating application.

If you have any questions, please contact me at (813) 682-8094.

Sincerely,

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

mmm

Enclosure

c: C. Norton - ERM

13113.19/01/HW102392.LTR/2



October 23, 1992

Hazardous Waste Supervisor
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

D.E.R.
OCT 23 1992
SOUTHWEST DISTRICT TAMPA

RE: Class I Modification and Informational Update; Safety-Kleen, Tampa, Florida;
FLD 980847271

Dear Sir:

Enclosed are four sets of revised pages for the Contingency Plan for the above-referenced facility. These revised pages include updated emergency contacts and minor additions to the discussion of activities which may occur onsite. The minor activities (i.e., tanker truck to tanker truck transfer of spent antifreeze) are done on a transfer basis. These changes do not affect the permitted wastes. The facility has one contingency plan which addresses both permitted and transfer wastes. These minor additions are to assure that the facility is in compliance with the transfer rules.

If you have any questions, please contact me at (813) 682-8094.

Sincerely,

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

Enclosure

mmm

c: C. Norton - ERM

13113.19/01/HS102392.LTR/1



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 12, 1992

Mr. Victor L. San Agustin, P.E.
Regional Environmental Manager
Safety Kleen
129 South Kentucky Avenue, Suite 701
Lakeland, Florida 33801

D. E. R.

OCT 16 1992

Warning Notice 92-20
RE: Safety Kleen, All sites, Florida

SOUTHWEST DISTRICT
TAMPA

Dear Mr. San Agustin:

I have received and reviewed your liability certificates of insurance. I request that you resubmit the certificates on state forms (enclosed).

Please resubmit these forms within fourteen days receipt of this letter. Failure to do so by this date may result in the initiation of formal administrative enforcement proceedings through the issuance of a Notice of Violation and the assessment of penalties. If the Department issues a Notice of Violation and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If you have questions concerning this matter, I may be reached at 904/488-0300.

Sincerely,

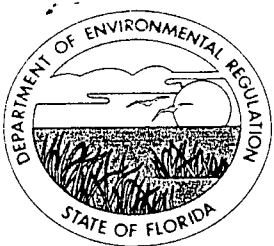
Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

Enclosure

cc: Jeff Pallas, EPA, Atlanta
Gary Santti, DER, Tampa
Knox McGee, DER, West Palm Beach
Bob Snyder, DER, Orlando
Bill Kellenberger, DER, Pensacola
Doug Outlaw, DER, Tallahassee
Camille Plautz, DER, Tallahassee



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 14, 1992

D. E. R.

OCT 16 1992

SOUTHWEST DISTRICT
TAMPA

Victor San Agustin, P.E.
129 South Kentucky Avenue
Suite 701
Lakeland, Florida 33801

Dear Mr. San Agustin:

Thank you for your letter dated July 29 in which you commented on our proposed revisions to Chapter 17-730, F.A.C. We are happy to consider your comments. The 21 day time limit from publication of the proposed rule in the Florida Administrative Weekly is for requesting a hearing with the Secretary, not for commenting on the proposed revisions.

The following is our response to your numbered comments.

1. The language in Rule 17-730.171, F.A.C. has included the term "contingency and emergency plan" for some time. Rule 17-730.171(2)(a), F.A.C. refers to 40 CFR Part 265 Subpart D as the requirements a transfer facility must comply with. The proposed revisions to the rule do not alter the format of the contingency plan and emergency procedures. We ask in the rule revision that the transfer facility send the department a copy of the contingency plan which they have already prepared.

It is not possible to provide a determination on the adequacy of the contingency plans you have sent as part of your operation permits in meeting the requirements for the transfer facility contingency plan before we finalize the revisions to the rule. Safety Kleen will have to work with the individuals handling the permits and those involved in compliance monitoring of the transfer facilities to determine whether the contingency plans are acceptable. The regulated unit or units and transfer facility contingency and emergency plans can be submitted as a single plan

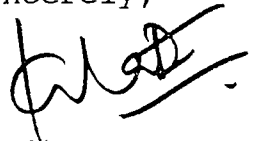
2. Again, Safety Kleen will have to work with the individuals handling the permit and those involved in compliance monitoring of the transfer facilities to determine whether the closure plans are acceptable. However, the closure plan for a transfer facility and for regulated units may be submitted as a single plan.
3. We will consider your suggestion for a future rule revision.

Victor San Agustin
October 14, 1992
Page two

4. Safety Kleen is not in violation since this is a new requirement. The update of the Transfer Facility Notification Form is due by March 1 of each year.

If you have any questions, please call Diane Hunt or Terri Chasteen at 904/488-0300.

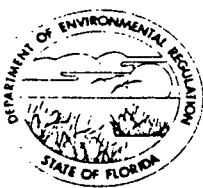
Sincerely,



Satish Kastury, Administrator
Hazardous Waste Regulation

SK/dho

cc: Bill Kellenberger, DER/Pensacola
Ashwin Patel, DER/Jacksonville
✓ Gary Santti, DER/Tampa
Bob Snyder, DER/Orlando
Ghaus Minhaj, DER/Ft. Myers
Knox McKee, DER/West Palm Beach
Raoul Clarke, BS&HW
Terri Chasteen, BS&HW
Linda Lakes, BS&HW
Diane Hunt, BS&HW
Allan Farmer, US EPA/Region IV



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: *gs* Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 10/14*

DATE: October 14, 1992

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center

Attached, please find correspondence dated September 22, and 23, 1992 and submitted September 28, and 24, 1992 respectively, which is subject to the referenced permit. The package includes the following items:

1. One cover letter detailing the installation of the automatic fire sprinkler.
2. One cover letter discussing publication and broadcast along with the necessary documents.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



Wye
10/8/92
LD RCR
D.E.R.
OCT 8 1992
SOUTHWEST DISTRICT
TAMPA

October 2, 1992

Sent Via Federal Express
Mail - October 2, 1992

Ms. Terri Chasteen
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Hazardous Waste and Used Oil Transporter's
Certificates of Liability Insurance for FFY93

Dear Ms. Chasteen:

Enclosed are Safety-Kleen Corporation's certificates of liability insurance for hazardous waste and used oil transporters to cover the period from October 1, 1992 to October 1, 1993.

Thank you for your assistance. If you have any questions, please call me at (813)682-8094.

Sincerely,

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

cc: Satish Kastury, BSHW
Raoul Clarke, BSHW
Allan Farmer, USEPA IV
Tom Moody, NWFDER
Mike Fitzsimmons, NEFDER
Bill Kutash, SWFDER ✓
Bill Bostwick, CFFDER
Vic Kamath, SEFDER
Phil Barbaccia, SFFDER

38
92

STATE OF FLORIDA

HAZARDOUS WASTE TRANSPORTER CERTIFICATE OF LIABILITY INSURANCE

1. Planet Insurance Company

(the "Insurer"), of [Name of Insurer] New York, New York

[Address of Insurer]

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to Safety-Kleen Corp.

(the "Insured"), of [Name of Insured] 777 Big Timber Road, Elgin, IL 60123

[Address of Insured]

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 17-730.170. The coverage applies at:

EPA/DER I.D. No.

Name

Address

(See Attached List - Florida)

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$2,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number NGA0105085, issued on 10/1/92. The effective date of said policy is 10/1/92.
[Date] [Date]

This insurance is excess and the company shall not be liable for amounts in excess of \$ for each accident in excess of the underlying limit of \$ for each accident, exclusive of legal defense costs. The coverage is provided under policy number , issued on . The effective date of said policy is .
[Date]

[Date]

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.

- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
- (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Regulation (FDER), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty-five (35) days after a copy of such written notice is received by the Secretary of the FDER as evidenced by certified mail return receipt.
- (e) The Insurer shall not be liable for the payment of any judgement or judgements against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgement or judgements resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.

Thomas Luckstone

[Signature of Authorized Representative of Insurer]

Thomas Luckstone

[Type name]

[Social Security Number]

Executive Vice President

[Title]

Authorized Representative of

Planet Insurance Company

[Name of Insurer]

77 Water Street, New York, New York

[Address of Representative]

STATE OF FLORIDA

<u>EPA/DER I.D. NO.</u>	<u>NAME</u>	<u>ADDRESS</u>
FLD 097837983	Safety-Kleen Corp.	505 Plumosa Dr. Altamonte Springs, FL 32701
FLD 984167791	Safety-Kleen Corp.	5610 Alpha Drive Quantum Industrial Park Boynton Beach, FL 33426
FLD 980847214	Safety-Kleen Corp.	161 Industrial Loop South Orange Park, FL 32073
FLD 984171694	Safety-Kleen Corp.	8755 NW 95th St. Medley, FL 33166
FLD 000776716	Safety-Kleen Corp.	19200 Peachland Blvd. Port Charlotte, FL 33949
FLD 982133159	Safety-Kleen Corp.	4426 Entrepot Blvd. Airport Ind. Park Tallahassee, FL 32310
FLD 980847271	Safety-Kleen Corp.	5809 24th Avenue South Tampa, FL 33619
FLD 984171165	Safety-Kleen Corp.	Lot 10 Northstar Business Park Sanford, FL 32771

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
HAZARDOUS WASTE TRANSPORTER STATUS SHEET

Transporter Name: Safety-Kleen Corp.

Mailing Address: 777 Big Timber Road
Elgin, Illinois 60123

Contact Person: Frank Taylor

Title: Branch Manager

Telephone number: (813) 626-1203

Facility Address: 5809 24th Avenue South
Tampa, Florida 33619

Facility EPA ID: FLD 980847271

Insurance Company:

Address:

Contact Person:

Telephone number:

Policy Number:

Expiration Date:

Completed by: Joyce Henrickson
Willis Corroon Corp. of IL Date: 9/24/92
(Please print or type)

Signature: *Joyce Henrickson*



File No.	_____
Date of Filing	_____
Amount	_____
Fee	_____

Used Oil Transporter Certificate of Liability Insurance

1. Planet Insurance Company (the "Insurer"), 77 Water Street, New York, NY 10005
(Name of Insurer) (Address of Insurer)
hereby certifies that it has issued liability insurance covering bodily injury and property damage for sudden accidental occurrences to Safety-Kleen Corp. (the "Insured"), 777 Big Timber Road, Elgin, IL 60123
(Name of Insured) (Address of Insured)
whose used oil registration number is ILD05160408 in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 17-710.600(d).

This insurance is primary and the company shall be liable for amounts up to \$ 2,000,000 less a deductible or retention of \$ - 0 - for each accident exclusive of legal defense costs. If a deductible or retention applies, its amount may not exceed 10% of the equity of the insured. The coverage is provided under policy number NGA0105085 issued on October 1, 1992 (Date). The expiration date of said policy is October 1, 1993 (Date) or the annual renewal date is October 1st (Date).

This insurance is excess and the company shall not be liable for amounts in excess of \$ _____ for each accident in excess of the underlying limit of \$ _____ for each accident, exclusive of legal defense costs. The coverage is provided under policy number _____, issued on _____ (Date). The expiration date of said policy is _____ (Date) or the annual renewal date is _____ (Date).

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- a. Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
- b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
- c. Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Regulation (FDER), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- d. Cancellation of the insurance, whether by the Insurer or the Insured or by any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty-five (35) days after a copy of such written notice is received by the Secretary of the FDER as evidenced by certified mail return receipt.
- e. The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.

Thomas Luckstone
(Signature of Authorized Representative or Insurer)

Thomas Luckstone
(Type name) (Social Security Number)
Executive Vice President
(Title)

Authorized Representative of

Planet Insurance Company
(Name of Insurer)
77 Water Street, New York, NY 10005
(Address of Representative)



September 22, 1992

D. E. R.

SEP 28 1992

SOUTHWEST DISTRICT
TAMPA

Ms. Lynn Milanian
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, FL 33610

RE: Fire Sprinkler System--Safety-Kleen Tampa Facility, FLD980847271

Dear Ms. Milanian:

Pursuant to a conversation on September 22, 1992 between yourself and our consultant, Ms. Cynthia Norton of Environmental Resources Management-South, Inc. (ERM), Safety-Kleen Corp. (Safety-Kleen) is commencing the installation of the fire sprinkler system. As noted in your August 28, 1991 letter, Safety-Kleen had put several fire sprinkler system alternatives out to bid. This bid and design process is now complete and Safety-Kleen is ready to commence installation of the system. Based upon your September 22, 1992 conversation, it is Safety-Kleen's understanding that this installation is not a class I permit modification since it was proposed during the original permitting process and the agency has been informed about the intention to install a fire sprinkler system.

As requested in your August 28, 1991 letter, upon completion of construction and testing Safety-Kleen will provide Florida Department of Environmental Regulation (FDER) with appropriate narrative changes to the text of the permit application and specification details on the fire protection system which has been installed.

Thank you for your attention to this matter. If you have any questions, please contact me at (813) 682-8094.

Sincerely,

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

chn

c: Cynthia Norton - ERM

3792

D.E.R.

SEP 16 1992

EPA/DER/INDUSTRY WORKSHOP
September 3, 1992SOUTHWEST DISTRICT
TAMPA

SIGN UP SHEET

FACILITY

Safety - Kleen

NAME	AFFILIATION	ADDRESS	PHONE NUMBER
James A DAVIS	Safety Kleen	5300 S. 1st Ave TAMPA FL	813-621-5457
Fred Stockbarger	Safety Kleen	Port Charlotte	813-629-4711
Rose Gammone	SAFETY KLEEN	DAVIE FL	904-264-2607
Roy STEWART	Safety-Kleen	ALTAMONTE Springs	407-430-6906
Bill CRAWFORD	Safety Kleen	129 S. Kentucky Ave Lakeland, FL	813-682-8094
John HODGES	Safety-Kleen	129 S. Kentucky Ave Lakeland, FL	813-682-8094
Victor San Agustin	Safety-Kleen	129 S. Kentucky Ave Lakeland, FL 33801	813-682-8094
CATHERINE McCORD	SAFETY-KLEEN	777 BIG TIMBER ELGIN IL 60123	708-2245
Rick Peoples	Safety-Kleen	777 Big Timbers Elgin, IL 60123	708-468-2559
Al Seifert	SAFETY-KLEEN	129 S. Kentucky Ave Suite 701, Lakeland FL, 33801	813-682-8094
TOM SAUND	SAFETY-KLEEN	BOYNTON BCH, FL 33426 5610 ALPHA DR	407-736-1339
Frank Taylor	SAFETY-KLEEN	P.O. Box 1045 BRANDON, FL 33509	813-626-1203
Satish Kastury	FDER - Tallahassee		(904) 488-0300

EPA/DER/INDUSTRY WORKSHOP
September 3, 1992

SIGN UP SHEET

FACILITY Safety Kleen

NAME	AFFILIATION	ADDRESS	PHONE NUMBER
Kent Williams	EPA	345 Courtland Atl	404/347-3433
Cheryl Marx	DER	2295 Victoria Ave. Ft Myers, FL 3365	(813) 332-6975
Ed O'Connell	DER	160 Gort Center Pensacola, FL	904 436-8360
Jane Gregory	DER	1900 S Congress Ave Suite A West Palm Bch, FL 33406	407/433-2050
DONALD L. TRUSSEN	DER	TALL.	904-488-0300
RALPH CLINE	USEPA	345 Courtland Atlanta, GA	(404) 347-7603
Jennifer Hobbs	DER	3319 Maguire Blvd. Suite 233 Orlando FL 32803	(407) 894-7555
Bill Congdon	DER	Talla.	904 488-9730
Diana Davis	DER	1825 N. ... Tall.	(904) 488-9730

EPA/DER/INDUSTRY WORKSHOP
September 3, 1992

SIGN UP SHEET

FACILITY Safety-Kleen

NAME	AFFILIATION	ADDRESS	PHONE NUMBER
<u>Anta K. Shipley</u>	<u>USEPA</u>	<u>345 (Coralwood St) All</u>	<u>(404) 347-3433</u>
<u>Lisa Gordon</u>	<u>FDER Marathon</u>		<u>305 289-2310</u>
<u>Charles Emery III</u>	<u>FDER</u>	<u>Fort Myers 2295 Victoria</u>	<u>813-332-697</u>
<u>Graus Minkay</u>	<u>FDER</u>	<u>Fort Myers 2295 Victoria Ave</u>	<u>813-332-6975</u>
<u>Ruf A. Patterson</u>	<u>EPA</u>	<u>ATLANTA</u>	<u>404-347-1603</u>
<u>Pamela Fellabaum</u>	<u>FDER - Jax</u>		<u>(904) 448-4320</u>
<u>MICHAEL FITZSIMMONS</u>	<u>FDER - JAX</u>		<u>(904) 448-4320</u>
<u>JONATHAN HESS</u>	<u>FDER - Tampa</u>		<u>(813) 620-6100 ext 38</u>
<u>Beth Knawss</u>	<u>FDER - TAMPA</u>		<u>" 4383</u>
<u>John E Griffin</u>	<u>FDER - Tallahassee</u>		<u>(904) 488-0300</u>

EPA/DER/INDUSTRY WORKSHOP
September 3, 1992

SIGN UP SHEET

FACILITY Safety-Kleen

NAME	AFFILIATION	ADDRESS	PHONE NUMBER
BILL KELLENBERGER	FDER	PENSACOLA	904-436-8360
Lyndee-McMurry	FDER	Tampa	813-622-6100
Agusta Posner	FDER	Thin Towers	904 488-9730
Michael H. Bedig	FDER	Tallahassee	904-488-0300
Merlin D Russell Jr	FDER	"	"
Shelb Lewis	FDER	"	"
BOB SNYDER	FDER	ORLANDO	(407) 894-7555
Hugh Hazen	USEPA	Atlanta, GA	404/347-3433
Ashwin B. Patel	FDER	Jax	904-448-4320
Doug Outlaw	FDER	Tallahassee	904-488-0300
BHEEM KOTHUR	FDER	TALLAHASSEE	904-488-0300
Cindy Norton	ERM-South	Tampa	813-622-8727
Steve Becker	Safety-Kleen	Tallahassee	904-576-9764



H029-158820

July 29, 1992

Sent Via Facsimile and Federal
Express Mail - July 29, 1992

Mr. Satish Kastury
Hazardous Waste Section
Florida Department of Environmental
Regulation - Tallahassee Office
2600 Blair Stone Road
Tallahassee, FL 32399-2400

D. E. R.

JUL 30 1992

SOUTHWEST DISTRICT
TAMPA

Subject: Proposed Transfer Facility Regulations
Volume 18, No. 26, Published in June 26, 1992
Edition of Florida Administrative Weekly

Dear Mr. Kastury:

Safety-Kleen acknowledges receipt of a fax of the above mentioned proposed regulations from Linda Lakes of your staff last July 21, 1992.

The purpose of this letter is to provide comments for the Department's consideration. We sincerely hope that the Department would consider our comments even though it has been over 21 days since the proposed regulation was published. We did request from Linda Lakes of your staff in March, 1992 that we be placed on a mailing list of parties who are interested in reviewing the draft when the proposed rules become available for public review.

Our comments are as follows:

1. Section 17-730.171, F.A.C. (2)(a) states that "the transfer facility shall submit the contingency and emergency plan to the Department."

Comment - Each of the Safety-Kleen facilities has a contingency plan which addresses both our transfer waste and permitted facility operations. These contingency plans have been filed with the Department and have been approved through the Department's Part B permitting process. The Department's Tallahassee and district offices have a copy of our respective Part B permit applications.

Prior to finalization of this rule, we would like to obtain clarification from the Department that our current contingency plans are satisfactory and also serve as "Contingency and Emergency Plans" for our transfer waste

storage area.

If a "contingency and emergency plan" is the same as a contingency plan as defined in 40 CFR 260.10, we request the term "contingency plan" be used instead in order to ensure to permitted facilities with transfer waste areas that this is not another separate plan that is being required by the Department.

2. Section 17-730.171(2)(b), F.A.C. requires that a "transfer facility shall have a written closure plan..." and that "existing transfer facilities shall submit a closure plan to the Department within 30 days of the effective date of this rule change."

Similar to item 1. above, closure plans for existing permitted facilities with transfer waste areas have been filed with the Department and have been approved through the Department's Part B permitting process. Copies of our respective Part B permit applications are at the Department's Tallahassee and district offices.

We would like to obtain some clarification from the Department prior to finalizing the rule, that one closure plan addressing closure of both the permitted and transfer waste areas is acceptable and that we would not need to submit a separate closure plan which addresses only the closure of the transfer waste area.

Furthermore we request that the following sentence be added to this section:

"Closure plans for permitted hazardous waste facilities that have transfer waste areas within the facility do not need to satisfy the requirements of Section 17-730.171(2)(b) if the closure plan for the permitted facility already addresses closure of the transfer waste area."

3. Section 17-730.171(2)(e), F.A.C. requires that the transfer facility maintain a "written record" which includes the generator's EPA ID number or the generator's name and address if the generator is conditionally exempt.

Safety-Kleen facilities do maintain a "written" facility operating log. The log includes the date the waste enters and leaves the facility, the name of the customer and the manifest number. The applicable customer EPA ID numbers are not on the log because the EPA ID numbers and manifest numbers are found in our customer invoices (a.k.a. preprints) which is part of each facility's operating record. Using the customer name and manifest number

on our facility operating log, one can obtain the EPA ID number or the address of the generator by opening the respective customer files at the facility.

Since we do maintain all the information being asked for in this section, we request that the term "operating records" be used instead of "written record".

4. Section 17-730.171(3), F.A.C. states " the transfer facility shall annually update the information on the Transfer Facility Notification Form (DER Form 17-730.900(6)) and send it to the Department.

Our transfer facility notifications were submitted in June, 1986. Since it is already past the anniversary date, our facilities may be construed as in violation of this requirement. We request that these annual updates be provided within 30 days of the effective date of this rule change and annually thereafter.

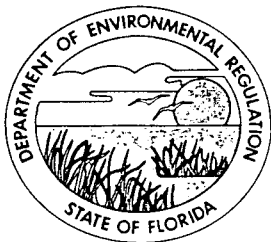
Your consideration in this regard is requested. If you have any questions, please call me at (813) 682-8094.

Sincerely,

Victor L. San Agustin

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

cc: Bill Kellenberger, NW-FDER
Ashwin Patel, NE-FDER
Gary Santti, SW-FDER
Bob Snyder, CF-FDER
Ghaus Minhaj, SF-FDER
Knox McKee, SE-FDER
Raoul Clarke, BSHW
Terri Chasteen, BSHW
Linda Lakes, BSHW
Diane Hunt, BSHW
Allan Farmer, USEPA IV



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

Mr. Victor San Agustin, P.E.
Regional Environmental Manager
Safety Kleen Corporation
129 S. Kentucky Avenue, Suite 701
Lakeland, FL 33801

June 30, 1992

RE: Safety Kleen Corp., FLD 980 847 271
Construction Permit Application HC29-210802
Clarification of Response to Notice of Deficiency

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has carefully examined the referenced package and is requesting clarification concerning the inspection logs submitted to address inspections for the ethylene glycol tank. Figure II. C. 11-3 details "inspection of the storage tank system". The first four items on the check list separate product tanks from waste tanks and the only distinction between the waste tanks is waste tank verses second waste tank. Describe the manner in which tank deficiencies will be reported on this log and how, for the remaining items on the log, distinctions will be made to accurately note each item per each tank. In order to clarify each item per each tank either separate check lists must be made to represent each waste tank or provisions made with the existing check sheet to demonstrate that the particular item was noted for each waste tank.

Additionally, monthly inspections are mentioned for each waste tank to ensure operation of the high level alarm, verification of level gauges and check valve operation. Will these monthly inspection results be recorded on an inspection log and then transferred to the operating log? The FDER requests a copy of the monthly inspection form and a photo copy of the most current operating log verifying these activities for the waste mineral spirit tank.

The FDER does anticipate preparing the forthcoming construction permit to include provisions authorizing Safety Kleen to operate the ethylene glycol tank upon certification of completion of construction during the interim stages of processing either a major operating permit modification or a new operating permit application.

Please prepare your written response to this notice within thirty days of receipt. If you have any questions, do not hesitate to contact me at (813) 620-6100 extension 388.

34
98

Safety Kleen Inc., FLD 900 847 271
HC29-210802
Request for Clarification

page 3

Sincerely,

A handwritten signature in dark ink, appearing to read "Lynne R. Milanian". The signature is fluid and cursive, with the first name "Lynne" and last name "Milanian" clearly distinguishable.

Lynne R. Milanian

Permitting Engineer

Hazardous Waste Section

Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee

sknod.doc



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

4520 Oak Fair Boulevard

813-620-6100

Tampa, Florida 33610-7347

Carol M. Browner, Secretary

Mr. Victor San Agustin, P.E.
Regional Environmental Manager
Safety Kleen Corporation
129 S. Kentucky Avenue, Suite 701
Lakeland, FL 33801

July 8, 1992

RE: Safety Kleen Corp., FLD 980 847 271
Operating Permit File No. HO29-158820
Modification of Rainwater Management Practices

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has approved and processed your request to modify the rainwater management practices at the Tampa Service Center.

Originally, Safety-Kleen proposed to contain storm waters received in the tank farm area by transferring the collected storm waters to the used mineral spirits tank. In accordance with the modification, Safety-Kleen will now examine storm waters received in the tank farm area to determine if an iridescent sheen is present. Only the Branch Manager or an individual operating under his direct orders will conduct this examination. Upon determination that the storm waters do not contain any hydrocarbon contaminants, Safety-Kleen shall be authorized to discharge these storm waters directly to the ground via a permanent pump installed within the tank farm strictly for storm water transfer.

Safety-Kleen officials shall be required to keep a written log of all storm water releases indicating the date, time, approximate amount of waters released, and the individual operating the pump in the facility operating record. The FDER shall be informed (via written letter) of all incidents requiring contaminated storm waters to be disposed along with the spent mineral spirits and Safety-Kleen shall be required to demonstrate decontamination of the tank farm area upon such occurrences.

Safety-Kleen is required to attach this letter to the operating permit to reflect the FDER's acknowledgment of the new storm water management procedures. If you have any questions, do not hesitate to contact me at (813) 620-6100 extension 388.

3392

Safety-Kleen Inc., FL 80 847 271
HO29-158820
Rainwater Management

Sincerely,



Lynne R. Milanian

Permitting Engineer
Hazardous Waste Section
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee
Charles Emery, Enforcement, FDER - Fort Myers

sklet.doc

**FEDERAL
EXPRESS**

QUESTIONS? CALL 800-237-5 TOLL FREE.

 AIRBILL
PACKAGE
TRACKING NUMBER

2086887825

2041M

2086887825

Date

7/11/92

RECIPIENT'S COPY

From (Your Name) Please Print VICTOR L. SAN AGUSTIN		Your Phone Number (Very Important) (305-591-9402)		To (Recipient's Name) Please Print LYNN MILANIAN		Recipient's Phone Number (Very Important) (813) 620-6100	
Company SAFETY KLEEN		Department/Floor No.		Company FLORIDA DEPT. OF ENVIRONMENTAL REGULATION		Department/Floor No. HAZARDOUS WASTE SECTION	
Street Address 7875 NW 54TH STREET				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 4520 Oak Fair Blvd.			
City MIAMI		State FL		City Tampa, Florida		State FL	
ZIP Required 33166		ZIP Required 33610					

YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)

 IF HOLD FOR PICK-UP, Print FEDEX Address Here
Street Address
City State ZIP Required

PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card			
5 <input type="checkbox"/> Cash/Check			

4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT in Pounds Only YOUR DECLARED VALUE		Emp. No. Date Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE		Standard Overnight (Delivery by next business afternoon) 51 <input type="checkbox"/> YOUR PACKAGING 56 <input type="checkbox"/> FEDEX LETTER 52 <input type="checkbox"/> FEDEX PAK 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE Lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> lbs. L x W x H = Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 5 <input type="checkbox"/> Station		Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 6/91 PART #137204 FXEM 1/92 FORMAT #099 099 © 1990-91 FEDEX PRINTED IN U.S.A.	
Freight Service (For Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT 80 <input type="checkbox"/> TWO-DAY FREIGHT									

 Delivery commitment may be later in some areas.
 *Declared Value Limit \$100
 **Call for delivery schedule.

MULTIPLE PACKAGE SERVICE

IF YOU ARE
MAKING AN MPS
SHIPMENT, APPLY
THE SELF ADHESIVE
MPS COPY HERE

DEFINITIONS

On this Airbill, we, our and us refer to Federal Express Corporation, its employees and agents. You and your refer to the sender, its employees and agents.

AGREEMENT TO TERMS

By giving us your package to deliver, you agree to all the terms on this Airbill and in our current Service Guide, which is available on request. If there is a conflict between the current Service Guide and this Airbill, the Service Guide will control. No one is authorized to alter or modify the terms of our Agreement.

RESPONSIBILITY FOR PACKAGING AND COMPLETING AIRBILL

You are responsible for adequately packaging your goods and for properly filling out this Airbill. Omission of the number of packages and weight per package from this Airbill will result in a billing based on our best estimate of the number of packages received from you and an estimated "default" weight per package, as determined and periodically adjusted by us.

AIR TRANSPORTATION TAX INCLUDED

Our basic rate includes a federal tax required by Internal Revenue Code Section 4271 on the air transportation portion of this service.

LIMITATIONS ON OUR LIABILITY AND LIABILITIES NOT ASSUMED

Our liability for loss or damage to your package is limited to your actual damages or \$100, whichever is less, unless you pay for and declare a higher authorized value. We do not provide cargo liability insurance, but you may pay an additional charge for each additional \$100 of declared value. If you declare a higher value and pay the additional charge, our liability will be the lesser of your declared value or the actual value of your package.

In any event we will not be liable for any damages, whether direct, incidental, special or consequential in excess of the declared value of a shipment, whether or not Federal Express had knowledge that such damages might be incurred including, but not limited to, loss of income or profits.

We won't be liable for your acts or omissions, including but not limited to improper or insufficient packing, securing, marking or addressing, or for the acts or omissions of the recipient or anyone else with an interest in the package. Also, we won't be liable if you or the recipient violates any of the terms of our agreement. We won't be liable for loss of or damage to shipments of prohibited items.

We won't be liable for loss, damage or delay caused by events we cannot control, including but not limited to acts of God, perils of the air, weather conditions, acts of public enemies, war, strikes, civil commotions, or acts or omissions of public authorities (including customs and quarantine officials) with actual or apparent authority.

DECLARED VALUE LIMITS

The highest declared value we allow for FedEx Letter and FedEx Pak shipments is \$100. For other shipments, the highest declared value we allow is \$25,000 unless your package contains items of "extraordinary value," in which case the highest declared value we allow is \$500. Items of "extraordinary value," include artwork, jewelry, furs, precious metals, negotiable

TERMS AND CONDITIONS

instruments, and other items listed in our current Service Guide.

If you send more than one package on this Airbill, you may fill in the total declared value for all packages, not to exceed the \$100, \$500 or \$25,000 per package limit described above. (Example: 5 packages can have a total declared value of up to \$125,000.)

If more than one package is shipped on this airbill, our liability for loss or damage will be limited to the actual value of the package(s) lost or damaged (not to exceed the lesser of the total declared value or the per package limits described above). You have the responsibility of proving the actual loss or damage.

FILING A CLAIM

ALL CLAIMS MUST BE MADE BY YOU IN WRITING. You must notify us of your claim within strict time limits. See current Service Guide.

We'll consider your claim filed if you call and notify our Customer Service Department at 800-238-5355 and notify us in writing as soon as possible.

Within 90 days after you notify us of your claim, you must send us all relevant information about it. We are not obligated to act on any claim until you have paid all transportation charges, and you may not deduct the amount of your claim from those charges.

If the recipient accepts your package without noting any damage on the delivery record, we will assume that the package was delivered in good condition. In order for us to process your claim, you must, to the extent possible, make the original shipping cartons and packing available for inspection.

RIGHT TO INSPECT

We may, at our option, open and inspect your packages prior to or after you give them to us to deliver.

NO C.O.D. SERVICES

NO C.O.D. SERVICES ON THIS AIRBILL. If C.O.D. Service is required please use a Federal Express C.O.D. airbill for this purpose.

RESPONSIBILITY FOR PAYMENT

Even if you give us different payment instructions, you will always be primarily responsible for all delivery costs, as well as any costs we may incur in either returning your package to you or warehousing it pending disposition.

RIGHT OF REJECTION

We reserve the right to reject a shipment at any time, when such shipment would be likely to cause damage or delay to other shipments, equipment or personnel, or if the transportation of which is prohibited by law or is in violation of any rules contained in this Airbill or our current Service Guide.

MONEY-BACK GUARANTEE

In the event of untimely delivery, Federal Express will, at your request and with some limitations, refund or credit all transportation charges. See current Service Guide for further information.



D. E. R.

JUL 02 1992

SOUTHWEST DISTRICT
TAMPA

July 1, 1992

Sent by Facsimile and
Federal Express Mail

Ms. Lynn Milanian
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610

RE: Minor Modification - Rainwater Management - Safety-Kleen Tampa Facility,
FLD980847271

Dear Ms. Milanian:

Safety-Kleen Corp. understands that the Florida Department of Environmental Regulation (FDER) is in receipt of the rainwater management minor modification request dated May 22, 1992 and the associated \$250 processing fee.

Pursuant to a conversation on June 30, 1992 between yourself and our consultant, Ms. Cynthia Norton of Environmental Resources Management - South, Inc. (ERM), Safety-Kleen may commence implementation of the revised rainwater management procedures as soon as this letter is filed with FDER unless FDER immediately notifies Safety-Kleen otherwise. This letter will function as agency approval of the minor modification until such time as a formal letter is received from FDER.

The revised rainwater management procedures are presented on pages II.C.2-3 and II.C.9-2 of the revised permit application. The procedures are:

"When rainwater accumulates in the containment area, and it has been verified that no spill has occurred, then the 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 or the water exhibits an iridescent sheen, then the rainwater will be pumped into the used mineral spirits tank. A permanent pump is installed in the tank farm for purposes of rainwater removal."

Thank you for your attention to this matter. If you have any questions, please contact me at (813) 682-8094.

13112.19/MILWATER.LTR/CHN/070192

777 BIG TIMBER ROAD

ELGIN, ILLINOIS 60123

PHONE 708/697-8460

FAX 708/697-4295

3292

Ms. Lynn Milanian

July 1, 1992

Page -2-

Sincerely,

A handwritten signature in cursive script, reading "Victor L. San Agustin".

Victor L. San Agustin, P.E.

Regional Environmental Manager

Tampa Region

c: Cynthia Norton - ERM

Safety-Kleen Corporation

7875 N. W. 54th Street
Miami, Florida 33166
305-591-9409

SAFETY-KLEEN CORP. FACSIMILE

3-097-02 MIAMI, FLORIDA

DATE 7/1/92 TIME 10:15APLEASE DELIVER THESE 3 PAGES,

INCLUDING THIS COVER PAGE TO:

NAME:

Lynn Milanian

DEPARTMENT:

SWFOERCOMPANY TELEPHONE NUMBER: (813) 620-6100FAX TELEPHONE NUMBER: (813) 620-6123

FROM:

~~CARY ALFONSO~~ Victor San Agusti

REFERENCE:

Rainwater Management in Tampa Branch

IF THERE IS ANY PROBLEM OR IF YOU DO NOT RECEIVE ALL THE
PAGES, PLEASE CALL AS SOON AS POSSIBLE.

OPERATOR'S TELEPHONE: (305) 591-9409

OUR FAX PHONE NUMBER: (305) 593-8548

Miami, FL

3-593-8548

31

92



July 1, 1992

Sent by Facsimile and
Federal Express Mail

Ms. Lynn Milanian
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610

RE: Minor Modification - Rainwater Management - Safety-Kleen Tampa Facility,
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777 BIG TIMBER ROAD

ELGIN, ILLINOIS 60123

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FAX 708/697-4295

Ms. Lynn Milanian

July 1, 1992

Page -2-

Sincerely,

Victor L. San Agustin

Victor L. San Agustin, P.E.

Regional Environmental Manager

Tampa Region

c: Cynthia Norton - ERM

13112.19/MILWATER.LTR/CHN/070192



9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727
8181 N. W. 36 Street • Suite 20 • Miami, Florida 33166 • (305) 591-3076
777 Yamato Road • Suite 130 • Boca Raton, Florida 33431 • (407) 241-1752

DATE	G-392	W.O. No.	13112.19
ATTENTION		13112.20	
RE:			

Adresse

WE ARE SENDING YOU ☐ Attached ☐ Under separate cover via _____ the following items:

- ☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications
- ☐ Copy of letter ☐ Change order ☐ _____

[illegible]

☐ For approval ☐ Approved as submitted ☐ Resubmit_____copies for approval
☐ For your use ☐ Approved as noted ☐ Submit_____copies for distribution
☐ As requested ☐ Returned for corrections ☐ Return_____corrected prints
☐ For review and comment ☐ _____
☐ FOR BIDS DUE _____ 19____ ☐ PRINTS RETURNED AFTER LOAN TO US

KS Please use the attached pages instead
of the ones originally received with
the May 22 letter.

COPY TO

SIGNED

If enclosures are not as noted, kindly notify us at once.

30 92



D.E.R.
JUN 04 1992
SOUTHWEST DISTRICT TAMPA

May 22, 1992

Project No. 13112.19, Task 21

Mr. Bill Crawford
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, FL 33610

RE: Minor Modification - Rainwater Management - Safety-Kleen Tampa Facility,
FLD #980847271

Dear Mr. Crawford:

Safety-Kleen Corp. is informing the Agency of a minor modification it is requesting to implement at the above-referenced facility. This modification consists of the addition of a pump in the tank farm containment area and a change in the rainwater management practices.

This pump will be used to remove accumulated rainwater and is connected directly to the used mineral spirits tank. The former practice at the facility requires that when rainwater has accumulated in the tank farm, a portable pump be placed in the containment area and the rainwater be pumped into containers. The containers are then taken to the wet dumpsters where the rainwater is added to the used mineral spirits tank. This process is manpower intensive and has a potential for container spillage. The use of the permanent containment sump will reduce the potential for spillage. The current high level alarm in the tank will prevent the tank from overflowing due to the addition of the rainwater.

The change in procedures described on pages II.C.2-3 and II.C.9-2 allows for the discharge of rainwater to ground surface if there is no visible evidence or reason to believe that the rainwater is impacted. This is consistent with Specific Condition IV.1 of the operating permit, which reads as follows:

- "1. The permittee shall visually inspect stormwater accumulating within the tank farm dike prior to release of these waters. Stormwater exhibiting an iridescent sheen shall be disposed in a Department-approved manner, as detailed on page II.C.2-3 of Section II.C. of the permit application."

Mr. Bill Crawford
May 22, 1992
Page -2-

It is Safety-Kleen's understanding that this change may not be made until approval is received from the Florida Department of Environmental Regulation (FDER). Safety-Kleen would appreciate your quick review of this proposed modification. If you have any questions, please contact me at (813) 682-8094.

Sincerely,



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

bai

c: Cynthia H. Norton - ERM



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

June 11, 1992

TO: HOLLY BURNAMAN
Office of General Counsel

FROM: *Erin M. West* District

DATE:

SUBJECT: OGC Case File to be Closed

Permit No.: HO29-158820 OGC File No.: 90-1637

Name of Applicant: SAFETY KLEEN CORP.

Select one of the following:

- (☒) Permit issued, not modified
- (☐) Permit issued, modified
- (☐) Final Order of Denial
- (☐) Permit application withdrawn

Date effective: *11-22-91*

*Please contact Lynne Milam if you have
any questions SC 542-6100 ext 388.*

*29
92*



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: RICHARD GARRITY

FROM: DOUG BEASON

DATE: JUNE 8, 1992

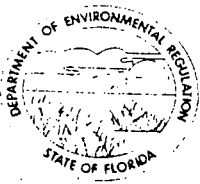
RE: OGC Case No. 90-1637
Permit Application No. HO29-158820
Name of Applicant: SAFETY KLEEN CORP.

On SEPTEMBER 20, 1992, petitioner was granted an extension of time until NOVEMBER 13, 1992, in which to file a petition for administrative proceedings concerning the above-captioned case. No petition or further request for extension was filed within the allotted extension of time.

If you have not taken any action since the petition was filed, the original agency action is now final. Please advise me of your disposition of this matter so that we may update and close our file.

Please call if there are any questions. Thank you for your assistance.

2892



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
THRU: Gary Santti *GS*
FROM: Lynne R. Milanian *lynne 5/29*
DATE: May 28, 1992
SUBJECT: Safety-Kleen Corp., FLD 980 847 271
Tampa Service Center, File No.: HO29-158820
Request for Minor Modification

Attached please find documents submitted May 22, 1992 by the referenced facility which are supplement to the subject permit.

This package includes information detailing:

1. 1 cover letter 2 pages long requesting revisions to stormwater accumulated in the tank farm.
2. 5 revisions to actual application pages.

LRM/ab
Attachment

cc: Alan Farmer, EPA Region IV

2792



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

May 28, 1992

Mr. Victor San Agustin, P.E.
Regional Environmental Engineer
Safety Kleen Corporation
129 S. Kentucky Avenue
Suite 701
Lakeland, FL 33801

Re: Tampa Service Center, FLD 980 847 271
Permit No.: HO29-158820
Minor Modification Request

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has carefully reviewed your request to change your management practice concerning stormwater accumulated within the tank farm area.

You have correctly identified this activity as being a Class I Modification to the existing permit. However, this change to the supporting documents, referenced by the permit, is considered a minor modification thus requiring a processing fee of \$250.00.

As such, review and approval of the requested modification shall be held in abeyance until receipt of the appropriate processing fee.

The package received at this office included 5 pages revised to be placed into the existing application. The first page is entitled "Port Charlotte, FL Service Center" Table I.D.3-1, followed by pages II.C.2-1, II.C.2-2, II.C.9-1 and II.C.9-3. Include along with the processing fee, those application revisions that correspond only to the Tampa Service Center. Also as Permit No. HO29-158820 Specific Condition Part IV No. 1 identifies page II.C.2-3 of Section II.C as the page discussing accumulated stormwater, the requested modification must clearly be presented on this page along with all the other changed pages. Also, narrative detailing the usage of a permanent pump with either hard piping or other method must be mentioned.

Do not hesitate to contact me at (813) 620-6100, extension 388 should you have any questions.

Sincerely,

Lynne R. Milanian
Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: Alan Farmer, EPA Region IV
Satish Kastury, FDER/Tallahassee
Cynthia Norton, ERM-South

26 92



D.E.R.

MAY 22 1992

SOUTHWEST DISTRICT TAMPA

May 22, 1992

Project No. 13112.19, Task 21

Mr. Bill Crawford
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, FL 33610

RE: Minor Modification - Rainwater Management - Safety-Kleen Tampa Facility,
FLD #980847271

D. E. R.
MAY 22 1992
SOUTHWEST DISTRICT
TAMPA

Dear Mr. Crawford:

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This pump will be used to remove accumulated rainwater and is connected directly to the used mineral spirits tank. The former practice at the facility requires that when rainwater has accumulated in the tank farm, a portable pump be placed in the containment area and the rainwater be pumped into containers. The containers are then taken to the wet dumpsters where the rainwater is added to the used mineral spirits tank. This process is manpower intensive and has a potential for container spillage. The use of the permanent containment sump will reduce the potential for spillage. The current high level alarm in the tank will prevent the tank from overflowing due to the addition of the rainwater.

The change in procedures described on pages II.C.2-3 and II.C.9-2 allows for the discharge of rainwater to ground surface if there is no visible evidence or reason to believe that the rainwater is impacted. This is consistent with Specific Condition IV.1 of the operating permit, which reads as follows:

- "1. The permittee shall visually inspect stormwater accumulating within the tank farm dike prior to release of these waters. Stormwater exhibiting an iridescent sheen shall be disposed in a Department-approved manner, as detailed on page II.C.2-3 of Section II.C. of the permit application."

2592

Mr. Bill Crawford
May 22, 1992
Page -2-

It is Safety-Kleen's understanding that this change may not be made until approval is received from the Florida Department of Environmental Regulation (FDER). Safety-Kleen would appreciate your quick review of this proposed modification. If you have any questions, please contact me at (813) 682-8094.

Sincerely,



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

bai

c: Cynthia H. Norton - ERM

Mr. Bill Crawford
May 22, 1992
Page -3-

bc: J. Davis - A/C Manager
C. McCord - Easter Division Manager
A. Seyfer - Regional Manager
F. Taylor - Branch Manager
SK Part B

TABLE I.D.3-1 (Continued)
SAFETY-KLEEN CORPORATION
PORT CHARLOTTE, FLORIDA SERVICE CENTER
PART 1 ATTACHMENT

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, K002, 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

* These wastes will be stored in containers in the container storage area. The maximum container capacity is 2,380 gallons.

** The spent and fresh mineral spirits storage tanks each have a maximum storage capacity of 15,000 gallons.

*** FRS wastes are transfer only wastes.



ATTACHMENT II.C.2

TANK SYSTEM SPECIFICATIONS

MATERIAL COMPATIBILITY

The facility includes two aboveground steel tanks. Used mineral spirits contained in drums returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The other 15,000-gallon tank is used to store product mineral spirits solvent and is, therefore, not considered a RCRA tank.

Product stored in the tanks at this facility is mineral spirits (petroleum naphtha). The material is compatible with the mild steel tank structure; in fact, mineral spirits are often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits 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 mineral spirits/water interface. Experience, however, has shown that the corrosion potential at the interface is minimal when compared to the potential for corrosion from soil conditions.

TANK DESIGN AND OPERATION PROCEDURES

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 Figure II.C.2-1. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. The design and installation of the tank alarm system is shown in Figure II.C.2-2. 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). The 15,000-gallon tank was installed new in the Spring-Summer of 1992. The 15,000-gallon tank was installed new in March 1986.

Attachment II.C.1 provides an independent assessment of the tank system. This assessment by Tera, Inc. includes a detailed description of the tank system components and operation. The following is a concise description of the main features of the tank system.

All tanks are aboveground, are supported on a six-inch skid, and are underlain by a six-inch concrete slab, and surrounded by a three-foot concrete dike. Therefore, no surface run-off would be in contact with the wastes stored at the site and no run-off collection and management system is deemed necessary. Equipment used in the operation of the aboveground tanks for used mineral spirits are gauges for measuring liquid levels in tanks and automatic high level alarms. The high level alarm will sound when the tank is 95 percent full. Filling of the tank must cease when the alarm sounds to prevent overfilling of the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw the content from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The tank may be operated at a maximum volume of 14,250 gallons (95 percent).

Wet Dumpster/Barrel Washers

Spent mineral spirits from parts washers is accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Used solvent is returned from customers via drums and poured into the barrel washers. The barrel is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the barrel rotates on the brush and the outside of the barrel is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the barrel to clean the inside of the barrel. The



ATTACHMENT II.C.9

CONTROLS AND SPILL PREVENTION

Description of Facility

The tank system is designed to minimize the potential for spills and to control any spills which may occur. The tank area prevention and control system includes proper tanks and containment walls and trenches. The return/fill shelter consists of dumpsters (barrel washes) located inside a containment area.

The prevention and control system minimizes the opportunity for an uncontrolled release of material to the environment.

The facility utilizes two aboveground steel tanks. Used mineral spirits contained in drums returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The other 15,000-gallon tank is used to store product mineral spirits solvent and is, therefore, not considered a RCRA tank.

Mineral Spirits

Product stored in the tanks at this facility is mineral spirits (petroleum naphtha). The material is compatible with the mild steel tank structure. In fact, mineral spirits is often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation. The mineral spirits 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 mineral spirits/water interface.

Used mineral spirits from parts washers is accumulated in a 15,000-gallon aboveground storage tank via the return/fill station. Used solvent is returned from customers via

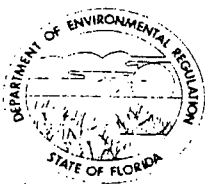
the manufacturer). The 15,000-gallon (fresh mineral spirits) tank was installed new in the Spring-Summer of 1992. The 15,000-gallon (spent mineral spirits) tank was installed in March 1986.

Attachment II.C.1 provides an independent assessment of the tank system. This assessment by Tera, Inc. includes a detailed description of the tank system components and operation. The following is a concise description of the main features of the tank system.

All tanks are aboveground, supported on a six-inch skid, and are underlain by a six-inch concrete slab, and surrounded by a three-foot concrete dike. Therefore, no surface run-off would be in contact with the wastes stored at the site and no run-off collection and management system is deemed necessary. Equipment used in the operation of the aboveground tanks for used mineral spirits are gauges for measuring liquid levels in tanks and automatic high level alarms. The high level alarm will sound when the tank is 95 percent full. Filling of the tank must cease when the alarm sounds to prevent overfilling of the tank. In addition, the gauges of the tank must be read before filling it and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw the content from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The tank may be operated at a maximum volume of 14,250 gallons (95 percent).

If the rainwater accumulates in the containment area and it has been verified that no spill has occurred, then the rainwater will be discharged to the ground surface. Only the branch manager or someone operating under this 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 mineral spirits tank via the wet dumpsters.





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury

Merlin Russell

THRU:

Gary Santti *trace*

Bill Crawford *will 5/14*

FROM:

Lynne R. Milanian *lyne 5/14*

DATE:

May 12, 1992

SUBJECT:

Safety-Kleen Corp., FLD 980 847 271

Operating Permit No.: HO29-158820

Assessment of Possible Releases from the North
Building

Attached please find documents submitted ranging from January 1992 to March 1992 by the referenced facility which are supplement to the subject permit.

This package includes information detailing:

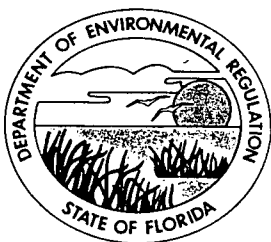
1. Confirmatory Sampling Workplan dated January 1992.
2. Notice of Technical Inadequacy from EPA dated January 1992,
3. Response from ERM to EPA dated February 20, 1992 having Attachment A and a Confirmatory Sampling Workplan revised February 1992,
4. Response from ERM to FDER dated March 16, 1992 having a North Building sampling plan dated March 1992.

Please review these documents and inform the Southwest District of any need for additional information you may have within 45 days.

LRM/ab
Attachment

cc: Alan Farmer, EPA Region IV

2492



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

May 12, 1992

John Hodges, Project Manager
Environmental Resources
Management-South, Inc.
9501 Princess Palm Avenue
Suite 100
Tampa, FL 33619

Re: Safety-Kleen Corp., FLD 980 847 271
North Building possible Contamination Assessment
Tampa Service Center, 24th Avenue and 54th Street

Dear Mr. Hodges:

The Florida Department of Environmental Regulation (FDER) has held numerous conversations with the U.S. Environmental Protection Agency (EPA) concerning the issues raised in your letter of March 13, 1992 which discussed the HSWA Confirmatory Sampling Work Plan.

As discussed in your letter, the FDER is in agreement that a separation of EPA's workplan (for investigation into possible solid waste management units) from the FDER's concerns is warranted.

The FDER is requiring assurances that a releasement from the North Building has not occurred. There appeared to be three possible ways for liquids containing hazardous constituents to have been discharged from the North Building to the on-site septic system. These three possibilities included the floor drain, the grated manhole and the hand wash sink.

As such, all the information that you have provided thus far, addressing the workplan, will be forwarded (for review) to our Tallahassee groundwater staff. Should you have any concerns, do not hesitate to contact me.

Sincerely,

Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: Alan Farmer, EPA Region IV
Merlin Russell, FDER/Tallahassee
Deborah Green, Safety-Kleen

2392



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Bill Crawford

THROUGH: Philip R. Edwards *Ans &*
Phil A. Barbaccia *Ans*

FROM: Charles Emery, III *CE/Ans*

DATE: May 7, 1992

SUBJECT: Safety-Kleen Corp. Correspondence File

We finally were able to locate these particular files. The information you gave me in our recent conversation helped in their location. We are sorry for any inconvenience this may have caused you. Thanks again.

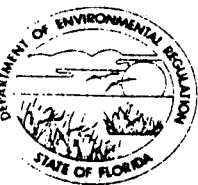
PRE/CE/vo
cc: Ghaus Minhaj

D. E. R.

MAY 11 1992

SOUTHWEST DISTRICT
TAMPA

22
92



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: Bill Kutash

THROUGH: Phil Edwards *DE*
Phil Barbaccia *PA3*

FROM: Ghaus Minhaj *gm*

DATE: April 29, 1992

SUBJECT: Safety-Kleen Final Permit H003-178811
and Correspondence file

WZ
5/5/92

D. E. R.

MAY - 5 1992

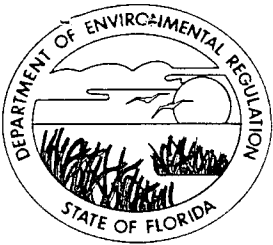
*SOUTHWEST DISTRICT
TAMPA*

The subject original final permit has not been received, however, a draft copy was received along with other Safety-Kleen files. I contacted Bill Crawford on April 13th and informed him I have not received the final version of the referenced permit and the correspondence file. He told me that he already sent it to this office, however we have no record of ever receiving it. In that regard, I am cordially requesting you to have another file search performed as this is a very important file. If you cannot find it, please let me know if a copy was sent up to the Tallahassee office.

I appreciate your assistance in this matter. You can reach me at SC 748-6975.

PRE/GM/vo

2/92



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 29, 1992

D. E. R.

Mr. Robert W. Willmschen
Vice President of Finance
Safety Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

MAY - 4 1992

SOUTHWEST DISTRICT
TAMPA

RE: Safety Kleen, Sanford, FL FLD 097 837 983
Safety Kleen, Delray Beach, FL FLD 984 171 165
Safety Kleen, Boynton Beach, FL FLD 984 167 791
Safety Kleen, Orange Park, FL FLD 980 847 214
Safety Kleen, Miami, FL FLD 980 840 086
Safety Kleen, Medley, FL FLD 984 171 694
Safety Kleen, Port Charlotte, FL FLD 000 776 716
Safety Kleen, Tallahassee, FL FLD 000 776 773
Safety Kleen, Tallahassee, FL FLD 982 133 159
Safety Kleen, Tampa, FL FLD 049 557 408
Safety Kleen, Tampa, FL FLD 980 847 271
Safety Kleen, Altamonte Springs, FL FLD 097 837 983

Dear Mr. Willmschen:

I have reviewed your financial test, dated March 18, 1992 for the above facilities. Your demonstration of financial assurance for closure and post closure care costs satisfies the financial responsibility requirements of 40 CFR Part 264 Subpart H. I have questions on the closure cost estimates for the Casselberry facility, FLD 097 837 983. This will be addressed in a separate letter.

3

Your next demonstration will be due by March 30, 1992. If I can be of further assistance, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

cc: Jeff Pallas, EPA, Atlanta
Bill Crawford, DER, Tampa
Bob Snyder, DER, Orlando
Bob Kukleski, DER, West Palm Beach
Bill Kellenberger, DER, Tallahassee
G. Minhaj, DER, Fort Myers

20 92



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 16, 1992

H029-158820

AI
D.E.R. 6-9

CERTIFIED MAIL
P 274 008 448

Mr. Charles W. Gerlach, Jr.
Operations Officer
The Northern Trust Company
Post Office Box 92921
Chicago, Illinois 60675

APR 22 1992

SOUTHWEST DISTRICT
TAMPA

RE: Safety Kleen Corporation, Delray Beach, Florida
FLD 000 776 757
Safety Kleen Corporation, Tampa, Florida
FLD 049 557 408

Dear Mr. Gerlach:

I received your cancellation notice for Letter of Credit, S235957, issued to Safety Kleen Corporation, Elgin, Illinois. Since Safety Kleen had successfully demonstrated an alternate financial assurance for closure and post closure care costs as specified under 40 CFR Parts 264.143(9)(10)(i) and 264.145(d)(11)(i) with a financial test, dated March 18, 1992, I am returning the Letter of Credit and appropriate amendments (enclosed).

Sincerely,

John M. Ruddell, Director
Division of Waste Management

JMR/mh

Enclosure

cc: Victor San Agustin, Safety Kleen
Bob Kukleski, DER, West Palm Beach
Bob Crawford, DER, Tampa
Lorraine Clark, DER, Tallahassee
Jeff Pallas, EPA



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

April 16, 1992

Mr. Victor San Agustin, P.E.
Regional Environmental Engineer
Safety Kleen Corporation
129 S. Kentucky Avenue
Suite 701
Lakeland, FL 33801

Re: Tampa Service Center, FLD 980 847 271
Permit No.: HO29-158820
Floor Coating and Vehicles Containing RCRA Wastes

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) acknowledges your intent to recoat the floors of the Tampa Service Center containment/storage areas with a sealant manufactured by Anchor.

Additionally, the FDER will expedite the modification you have requested to your operating permit concerning the loading of RCRA wastes onto vehicles for off-site disposal. The FDER will require, however, that Safety-Kleen officials keep records documenting the placement of RCRA wastes onto vehicles (for off-site disposal) to provide assurance that exceedance of the 3 day time frame is not occurring.

Recent policy from Tallahassee has informed this District that a minor modification processing fee will not be required for this activity. Class I permit modifications required by FDER in order to keep a permit current with routine changes to the facility, its operation, or clarification of an existing permit condition will not be considered for collection of processing fees. In other words, this issue is viewed as a clarification to FDER's permit specific condition and not a modification initiated on Safety-Kleen's part.

Should you have any further concerns do not hesitate to contact me at (813) 620-6100, extension 389.

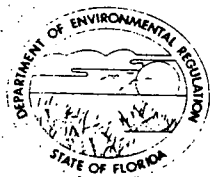
Sincerely,

Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: Alan Farmer, EPA Region IV
Satish Kastury, FDER/Tallahassee

1892



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Rick Garrity

THRU: Gary Santi *gl 4-17* *WAF 4/17/92*
Bill Crawford *WCC 4/17*

FROM: Lynne R. Milanian *lymme 4/17*

DATE: April 16, 1992

SUBJECT: Safety-Kleen Corporation, Tampa Service Center
FLD 980 847 271, Permit No.: HO29-158820
Modification of Permit Conditions

The Tampa Service Center is authorized to store hazardous wastes in containers and tanks. In effect, the center acts as a storage location for the various waste types until enough has been gathered from customers to warrant shipment of a load to a recycle center.

The issued permit clearly addressed the amount of time authorized for off-loading of containerized wastes to the respective storage areas. However, loading of stored wastes onto vehicles for off-site treatment and disposal was not discussed. As such, a permit modification has been prepared to clarify the amount of time authorized to consolidate a load of containers onto a transport vehicle for off-site disposal.

Permit modification is recommended.

LRM/ab
Attachment

1792



D. E. R.

APR - 9 1992

SOUTHWEST DISTRICT
TAMPA

April 7, 1992

Project No. 13112.19, Task 17

Director of District Management
Florida Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Tampa Service Center; FLD980847271; Permit No. 29-158820

Dear Sir:

Safety-Kleen is requesting a Class I modification to Part II Specific Condition 17 of the above-referenced permit. Currently, this condition reads as follows:

- "17. No vehicle containing RCRA regulated containers or RCRA regulated wastes shall be onsite at the facility for more than three (3) days before its contents shall be unloaded into a storage area."

Based on conversations with Ms. Lynn MiLanian and Mr. William Crawford of your office, this permit condition was developed with incoming hazardous waste shipments in mind. Since this facility is an accumulation center, it both receives and ships wastes. The shipment of wastes to the recycle center requires the preloading of a tractor-trailer bed. At times, this preloading will need to occur on Friday for Monday shipment to the recycle center. In order to do this, waste containers need to remain in the tractor-trailer for over two days. This is a similar situation to that which prompted the development of Specific Condition 17. Specific Condition 17 was developed to address those trucks which arrive late on Friday and cannot be unloaded until Monday.

Safety-Kleen concludes that the same element of potential risk of an associated release is present whether the vehicle sitting onsite for up to three days is carrying wastes intended for deposit in the accumulation center or whether it is awaiting shipment to the recycle center.

Director of District Management
April 7, 1992
Page -2-

Safety-Kleen therefore proposes that Part II, Specific Condition 17 be reworded as follows:

- "17. No vehicle containing RCRA regulated containers or RCRA regulated wastes shall be onsite at the facility for more than three (3) days before its contents shall be unloaded into a storage area, or in those instances where a truck is being loaded for shipment to a recycle center, the truck must leave the facility for the recycle center within three (3) days of the first container of waste being placed on the vehicle."

4-12-92
ensure that documents
exist to allow an
inspector to verify this time
frame @cc
OK

Safety-Kleen is aware that FAC 17-4 requires a \$250 fee for minor modifications; however, we have been informed by the various districts and Tallahassee that the applicability of the \$250 fee to any Class I modification is up to the district. If a fee is required for this modification, please notify us immediately and a fee will be provided.

If you have any questions, please contact me at (813) 682-8094.

Sincerely,



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

bai

c: C. Norton - ERM



D. E. R.

MAR 25 1992

SOUTHWEST DISTRICT
TAMPA

March 23, 1992

Mr. William Crawford
Florida Department of
Environmental Regulation (FDER)
Southwest District
4520 Oak Fair Blvd.
Tampa, FL 33610

Re: Safety-Kleen Facility, FLD980847271, Floor Coating

Dear Mr. Crawford:

Safety-Kleen Corp. is informing the agency that it intends to recoat the floors in the accumulation center containment/storage areas with a product from Anchor. A Class I Modification was filed on January 20, 1992, requesting that "Semstone or equivalent" be added to the description of the floor coatings. We feel the Anchor coating product is capable of providing adequate chemical resistance for the operations conducted in the accumulation center. Enclosed is a copy of a product specification sheet for an Anchor coating.

Safety-Kleen intends to proceed with the recoating within 30 days. If you have any questions, please call me at 813-682-8094.

Sincerely,

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

ksc/mmm

c: C. Norton - ERM

813-1-688-3683

HI-BUILD EPOXY #3900 SERIES



DESCRIPTION:

This material is a high-solids polyamide cure epoxy coating that provides room temperature cured finishes having many film properties normally associated only with baked coatings.

Polyamide cured epoxies combine outstanding resistance to heat, solvents, tap water, salt water, and most shock and abrasion. Excellent adhesion and flexibility are obtained over wood, ferrous and non-ferrous metals, floors, and "green" or dry concrete. Since the reaction between epoxy resins and curing agents takes place at room temperature, these formulations must be supplied as two-package systems, i.e., the curing agent must be packaged separately from the base component containing the epoxy resin.

At normal room temperatures, catalyzed epoxy coatings attain a high degree of cure overnight, but require up to seven (7) days to approach maximum chemical and solvent resistant properties.

Very rapid cures can be obtained by force-drying or baking.

Check with Anchor representative for your specific job recommendations.

TECHNICAL DATA:

COLOR	White (colors available)
GLOSS	High Gloss
DENSITY (Spec. Gravity)	11.2-11.6 lbs/gallon
SOLIDS BY VOLUME	50 ± 3%
FLASH POINT	60°F. T.C.C.
RECOMMENDED DRY FILM THICKNESS RANGE	2.0 mils dry/coat minimum
SPREADING RATE (Theoretical)	800 sq. ft. @ 1 mil dry
DRYING TIME @ 70°F.	
To Touch	3-4 hours
Recoat	24-48 hours
Cure	7 Days
CHEMICAL RESISTANCE	
Alkalis	Excellent
Acids	Fair
Water	Excellent
Strong Solvent	Good

APPLICATION DATA:

APPLICATION BY:	Brush, Spray or Roll
THINNER:	#3906 Hi-Build Epoxy Thinner
POT LIFE:	24 Hours after catalyst is mixed @ 70°F.
MIXING RATIO:	1 part #3906 Catalyst to 1 part Epoxy. Allow to stand 30 minutes before applying.

RECOMMENDED SURFACE PREPARATION:

OLD WORK — Prior to application ensure that the substrate is free of any contaminants according to SSPC-SP1. All damaged areas should be repaired and existing paint should be in good condition. Test existing paint for lifting and if so, it must be removed or application of barrier primer must be used.

NEW WORK — For best performance on steel, surface should be blasted to minimum SSPC-SP6, including the removal of all mill scale. Prior to blasting, remove all flux and scab from welding and grind smooth all rough weld seams and sharp edges. Remove any grease, oil, or dirt with solvent or chemical cleaner before blasting. The surface should be coated as soon as possible after blasting.

SECTION 9 — PAGE 5

ANCHOR PAINT

"Anchored for wear"



CONCRETE FLOORS — Old concrete floors must be tested for lifting and old paint removed if not resistant to epoxy. Surface must be cleaned of all dirt, oils, or other contaminants with detergent; thoroughly rinsed and dried. New floors must be cured. All floors then must be etched with 3% solution of Muriatic Acid, thoroughly rinsed and dried.

ADDITIONAL APPLICATION DATA:

Clean equipment thoroughly before and immediately after use with #3905 thinner or toluene. This type coating cures by chemical reaction rather than oxidation. The cure time is totally dependent on the substrate temperature. The coating will not cure where the substrate is below 50°F.; at 70°F. cure time is approximately 7 days. Avoid applications where relative humidity is above 85%. Allow for application losses due to overspray conditions and surface texture.

SAFETY:

During application take normal precautions such as wearing safety gloves, face masks and eye shields. Adequate ventilation must be maintained when applying this product in confined spaces. Keep material away from sparks or open flames.

WARRANTY:

The technical data furnished is true and accurate to the best of our knowledge. However, no guarantee is expressed or implied. Product data are subject to change without notice. The user should check with our sales office when the date of printing has elapsed more than 12 months to validate data. We guarantee our products to conform to ANCHOR PAINT MFG. COMPANY quality control standards. We assume no responsibilities for its handling, use, storage, the results obtained or any injury or damage because of misuse.

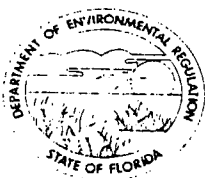
FOR INDUSTRIAL USE ONLY

SECTION 9 — PAGE 6

ANCHOR PAINT

June, 1990

Anchored for wear



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury

THRU: Gary Santti *ls 4-2* *AI, 6-2*

FROM: Bill Crawford *WCC 4/2*

DATE: April 2, 1992

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit HO29-158820
Specific Condition I-30 Waste Minimization Program

Attached please find a copy of Safety Kleen's Waste Minimization Training Program for generators, submittal dated March 31, 1992 and submitted April 1, 1992. Your comments are requested for our response to this submittal and should be received within 45 days.

c.c Alan Farmer EPA Region IV

1492



D. E. R.

APR - 1 1992

SOUTHWEST DISTRICT
TAMPA

March 31, 1992

Project No. 13112.19, Task 18

Director of District Management
Florida Department of
Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347
ATTN: Hazardous Waste Permitting Program

AI 6-g

RE: Specific Condition 30, Safety-Kleen, Tampa, Florida; FLD980847271;
Permit H029-158820

Dear Sir:

Attached is Safety-Kleen's Waste Minimization Training Program, which was developed to comply with Specific Condition 30 of the above-referenced permit.

If you have any questions, please call me at (813) 682-8094.

Sincerely,

Victor San Agustin

Victor San Agustin
Regional Environmental Engineer
Tampa Region

bai

c: C. Norton - ERM

13112.19/01/DD033192.LTR/1

**SAFETY-KLEEN
CUSTOMER'S
GUIDE TO
WASTE MINIMIZATION
MARCH 1992**

D. E. R.
APR - 1 1992
SOUTHWEST DISTRICT
TAMPA

Prepared by:

**Environmental Resources
Management-South, Inc.
9501 Princess Palm Avenue, Suite 100
Tampa, Florida 33619
(813) 622-8727**



1292

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1. INTRODUCTION	1
2. WHY SHOULD I INSTITUTE WASTE MINIMIZATION AT MY BUSINESS?	1
3. WHAT EXACTLY IS WASTE MINIMIZATION?	2
4. HOW DO I START WASTE MINIMIZATION AT MY FACILITY?	4
5. HOW CAN I PRACTICE WASTE MINIMIZATION?	5
6. WHAT SAFETY-KLEEN SERVICES CAN HELP ME PERFORM WASTE MINIMIZATION?	6
7. WHERE CAN I GET ADDITIONAL ASSISTANCE AND INFORMATION ABOUT WASTE MINIMIZATION?	9

INTRODUCTION

Waste minimization at your business can save you money while helping you meet federal and state environmental regulations. In order to help our customers develop a waste minimization (WM) program, Safety-Kleen has developed the following information for our customers.

WHY SHOULD I INSTITUTE WASTE MINIMIZATION (WM) AT MY BUSINESS?

If you generate waste, waste minimization can help you:

- ***Save money.*** The less waste you generate or dispose of, the less you pay in disposal costs. In addition, WM can help you use fewer raw materials and can help you save money in operating costs.
- ***Comply with the law.*** WM is required by the federal government under the Resource Conservation and Recovery Act of 1986 (RCRA) regulations. Both the federal and state governments have requirements for reducing the amount of waste facilities generate. **In fact, each time you sign a hazardous waste manifest, you are certifying that you have an established WM program in place. Do you??!**
- ***Reduce your Cradle-to-Grave liability.*** Under RCRA, once you generate waste you are responsible for it forever. Period. WM can help you reduce the waste you generate, thereby reducing the likelihood of a problem with the waste.
- ***Help protect the public health and worker health and safety.*** Handling waste can be hazardous and requires specific procedures. Improper handling and sometimes unavoidable accidents can present risks to your employees and the public.

- ***Protect the environment.*** Waste generation and disposal uses our resources and the environment. WM helps conserve both of these.

WHAT EXACTLY IS WASTE MINIMIZATION (WM)?

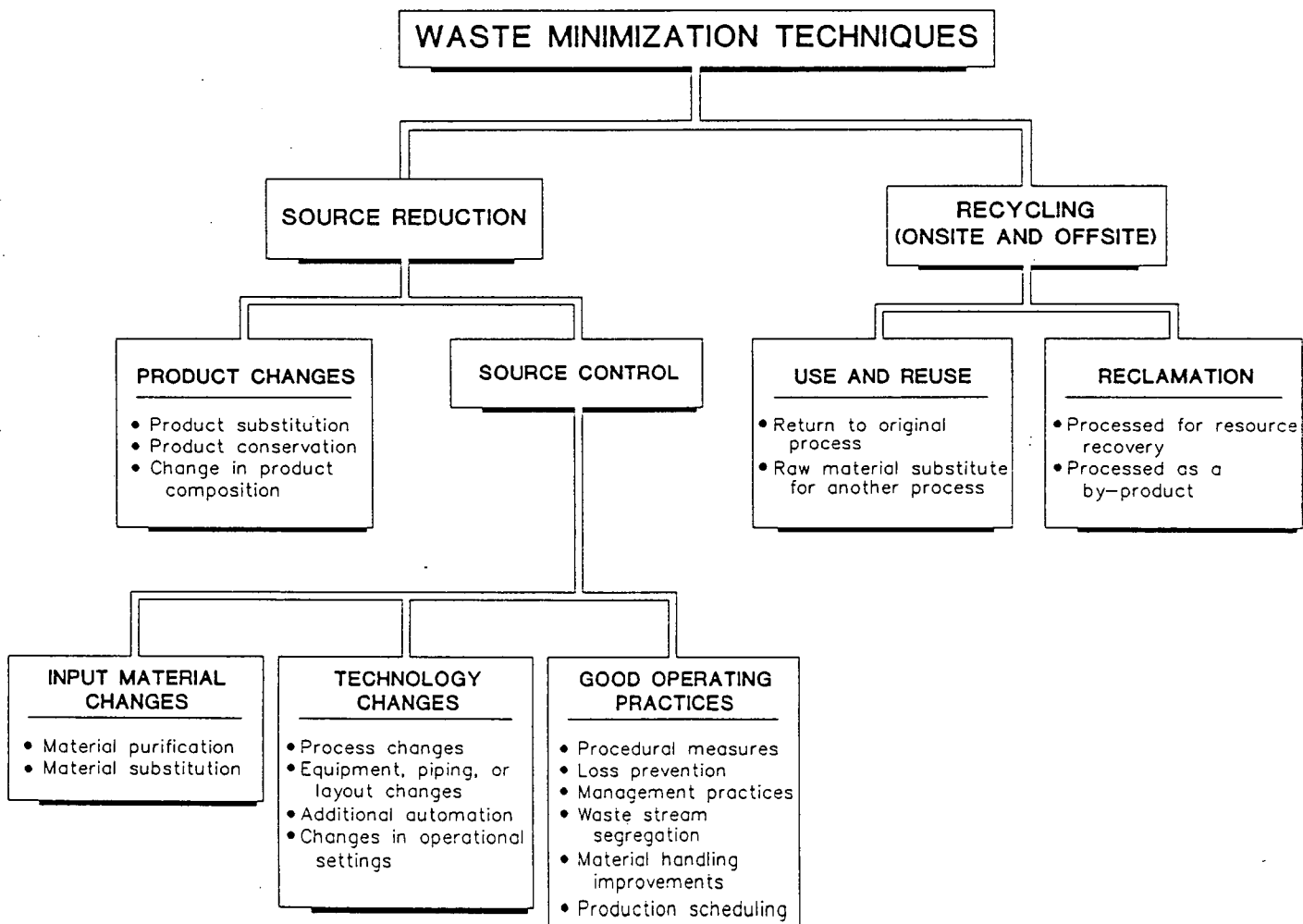
Waste minimization is specifically required by the U.S. Congress in the 1984 Hazardous and Solid Waste Amendments to the Resource and Conservation and Recovery Act (RCRA). Because of the cost of waste disposal and the liability associated with disposal of waste, waste minimization is enjoying a wide acceptance among industries.

Waste minimization (WM) consists of ***source reduction and recycling***. The following figure depicts WM techniques. More specifically, WM is the reduction of the generation and disposal of hazardous waste. WM includes source reduction and recycling which results in either:

- The reduction of total volume or quantity of hazardous waste, or
- The reduction of the toxicity of hazardous waste.

WM results in the minimization of threats to human health and the environment.

WASTE MINIMIZATION TECHNIQUES



HOW DO I START WM AT MY FACILITY?

As discussed earlier, RCRA and Florida state require generators to establish WM at their facilities. In order to do this cost effectively, the program should have the following elements:

- ***Management Commitment*** - Your facility as a whole must understand why WM is important. Management must support and reward employees for developing and implementing WM.
- ***A WM Assessment*** - Your facility should carefully evaluate ways to reduce and eliminate waste. This assessment requires a careful analysis of what materials are used, what materials can be substituted, how mixing of waste can be avoided, and whether alternate technologies are available for reducing waste.
- ***A Specific WM Program*** - Your program should be specific and detail how WM will be achieved.
- ***Waste Generation and Cost Accounting*** - Your facility should have excellent records on how much waste is generated and how much waste is reduced. The cost associated with reducing waste is an important aspect of maintaining management commitment to a WM Program.

HOW CAN I PRACTICE WM?

Consider the following basic methods to achieve WM:

- ***Management Practices including:***
 - Waste Segregation - Don't mix waste oil with waste solvents!
 - Material Handling and Inventory Practices - Store materials so they don't spill and generate waste. Store only as much of a material as you need - especially materials with limited "shelf-life."
 - Loss Prevention - Make sure your processes don't waste raw materials. Keep machinery maintained to avoid spillage/leakage.
 - Cost Accounting - Make separate departments in your facility responsible for their own waste disposal costs!
 - Production Schedule - Can you run several work batches before cleaning equipment or changing raw materials? This reduces waste materials.
- ***Process Modifications:***
 - Change:
 - how the product is made;
 - equipment used in the process; or
 - operation conditions.

- ***Product Changes:***

- Substitute products - use Safety-Kleen's Immersion Cleaner 699 instead of chlorinated cleaners.
- Change the composition of the product.
- Conserve the product.

- ***Recycle and Recover Material:***

- Use or Reuse a waste material - For example, add waste paints to fresh paint in a painting process.
- Reclaim a valuable material - Recover silver from film processing wastewater - this is a form of WM.

WHAT SAFETY-KLEEN SERVICES CAN HELP ME PERFORM WM?

Safety-Kleen provides many services to its customers which can help them meet their WM responsibilities through recycling and recovery. Several of these services are discussed below.

Option 1: Safety-Kleen collects mineral spirits, perchloroethylene, and organic solvents and distills these to remove solids and contaminants. The waste material then becomes reusable for Safety-Kleen customers.

Option 2: Safety-Kleen collects used ethylene glycol and removes oil and water as well as the lead and perchloroethylene which makes the used material a hazardous waste. The "cleaned up" ethylene glycol is then sold to ethylene glycol



buyers who use the materials. Thus, Safety-Kleen takes waste material from its customers and converts the waste into a usable, non-waste product.

Option 3: Safety-Kleen also recycles waste cleanup material, such as cleanup from hazardous waste spills, and uses this as an alternate product. Safety-Kleen collects organic based absorbent material, sludges from storage tank removals, etc., and provides these materials to fuel blenders who operate permitted facilities that mix these wastes with fuel for energy generation.

There are as many recycling/recovery options as there are waste materials that Safety-Kleen collects.

The following table provides some WM opportunities:

SAFETY-KLEEN CUSTOMER INDUSTRIES AND WM OPTIONS

Type of Client	Waste Services Provided to Client
Automotive Repair Facilities	MS parts washer, antifreeze pickup, immersion cleaner for parts cleaning, waste oil and oil filters (crushed and uncrushed), waste freon, spent oil cans, oily water, gasket adhesives, acetone, methyl ethyl ketone
Automotive Body Repair Facilities	MS parts washer, paint waste, waste lacquer thinners, paint gun cleaning
Printing Facilities	MS parts washer, mineral spirits for cleaning rollers, inks, print rollers, paint gun, cleaning lacquer thinners

**SAFETY-KLEEN CUSTOMER INDUSTRIES AND WM OPTIONS
(Continued)**

Type of Client	Waste Services Provided to Client
Photographic Developing Facilities	Waste developer
Golf Course, Lawn Maintenance Facilities	MS parts washer, immersion cleaner for parts washing, waste oils
Boat Works	MS parts washer, immersion cleaner for parts washing, paint gun cleaning, waste oils
Hospitals	FRS wastes
Dry Cleaners	Cleaning solvents
Woodworking Facilities	Immersion cleaner for parts washing, strippers, lacquers, varnishes, stains
Electrical Supply Manufacturers	Waste oil, mineral spirits, organic based absorbent materials
General Industry	MS parts washer, immersion cleaner, paints, lacquer thinners, FRS wastes, organic based absorbent materials, oily water, heavy metal sludges

WHERE CAN I GET ADDITIONAL ASSISTANCE AND INFORMATION ABOUT WM?

- Call the federal government at the EPA/RCRA/Superfund Hotline:

(800) 424-9346

- Also, the EPA and US Government Printing Office ((202) 783-3238) can supply the following guides:
 1. Waste Minimization Audit Report: Case Studies of Corrosive and Heavy Metal Waste Minimization Audit at a Specialty Steel Manufacturing Complex.
 2. Waste Minimization Audit Report: Case Studies of Minimization of Solvent Waste for Part Cleaning and from Electronic Capacitor Manufacturing Operation.
 3. Waste Minimization Audit Report: Case Studies of Minimization of Cyanide Wastes from Electroplating Operations.
 4. Report to Congress: Waste Minimization, Vols. I and II. EPA 530-SW-86-033 and 034 (Washington, D.C.: US EPA, 1986).
 5. Waste Minimization: Issues and Options, Volumes I-III. EPA 530-SW-86-041 through -043. (Washington, D.C.: US EPA, 1986).
 6. Guides to Pollution Prevention: The Commercial Printing Industry. EPA 625/7-90/008, August 1990.
 7. Waste Minimization Opportunity Assessment Manual. EPA 625/7-88/003, July 1988.

8. Guides to Pollution Prevention: The Fabricated Metal Products Industry. EPA 625/7-90/006, July 1990.
 9. Guides to Pollution Prevention: Selected Hospital Waste Streams. EPA 625/7-90/009, June 1990.
 10. Guides to Pollution Prevention: The Printed Circuit Board Manufacturing Industry. EPA 625/7-90/007, June 1990.
 11. Seminar Publication: Meeting Hazardous Waste Requirements for Metal Finishers. EPA 625/4-87/018.
 12. Guides to Pollution Prevention: Research and Educational Institutions. EPA 625/7-90/010, June 1990.
- Contact your state and local environmental agencies:

Florida Department of Environmental Regulation's
Hazardous Waste Group in Tallahassee: (904) 488-0300

Georgia Environmental Protection Division: (404) 656-2833

South Carolina Bureau of Solid and
Hazardous Waste Management: (803) 734-5208
 - Contact your Trade Association (see following table):

SELECTED INDUSTRY TRADE ASSOCIATIONS

Trade Association	Address	Phone No.
American Car Rental Association	927 15th Street, NW, Suite 1000 Washington, DC 20005-2304	(202) 789-2240
American Chemical Society	1155 16th Street, NW Washington, DC 20036	(202) 872-4600
American Truck Dealers Association	8400 Westpark Drive McLean, VA 22102	(703) 821-7116
Automotive Dismantlers & Recyclers Association	10400 Eaton Place, Suite 203 Fairfax, VA 22030-2208	(703) 385-1001
Automotive Engine Rebuilders Association	330 Lexington Drive Buffalo Grove, IL 60089-6998	(708) 541-6550
Automotive Parts Rebuilders Association	4401 Fair Lakes Court, Suite 210 Fairfax, VA 22033	(703) 790-1050
Automotive Service Association	1901 Airport Freeway, Suite 100 Bedford, TX 76095-0929	(817) 283-6205
Automatic Transmission Rebuilders Association	2472 Eastman Avenue, Suite 23 Ventura, CA 93003	(805) 654-1700
Filter Manufacturers Council	300 Sylvan Avenue Englewood Cliffs, NJ 07632-1638	
Gasoline and Automotive Service Dealers Association	6338 Avenue N. Brooklyn, NY 11234-5599	(718) 241-1111

SELECTED INDUSTRY TRADE ASSOCIATIONS
(Continued)

Trade Association	Address	Phone No.
Halogenated Solvents Industry Alliance	1225 19th Street, NW, Suite 300 Washington, DC 20036-2411	(202) 223-5890
International Fabricare Institute	12251 Tech Road Silver Springs, MD 20904	(301) 622-1900
Motorcycle Industry Council	2 Jenner Street, Suite 150 Irvine, CA 92718	(714) 727-4211
Petroleum Equipment Institute	Box 2380 Tulsa, OK 74101-2380	(918) 494-9696
Petroleum Marketers Association of North America	1120 Vermont Avenue, NW, Suite 1130 Washington, DC 20005	(202) 331-1198
Recreation Vehicle Dealers Association of North America	3251 Old Lee Highway, Suite 500 Fairfax, VA 22030	(703) 591-7130
Service Station Dealers of America	499 S. Capitol Street, SW, Suite 407 Washington, DC 20003	(202) 479-0196
Society of Collision Repair Specialists	1740 Irvine Boulevard, Suite N Tustin, CA 92680	(714) 838-3115



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
THRU: Bill Crawford *acc 1/22*
FROM: Lynne R. Milanian *Lynne 1/22*
DATE: January 22, 1992
SUBJECT: Safety-Kleen Corp., FLD 980 847 271
Operating Permit HO29-158820
Class I Modifications

Attached please find documents submitted Janaury 21, 1992 by the referenced facility which are supplement to the subject permit.

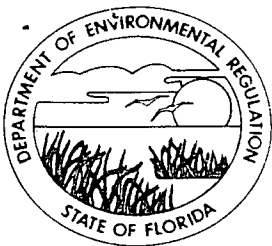
This package includes information detailing:

1. A 2 page cover letter, and
2. 1 copy of replacement pages for incorporation into
active application.

LRM/ab
Attachment

cc: James Kutzman, EPA Region IV

1192



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

H029-158820

January 21, 1992

AI, 6-j

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

Re: Safety Kleen Corporation, FLD 049557408, Tampa, FL
Safety Kleen Corporation, FLD 000776757, Delray Beach, FL
Safety Kleen Cororation, FLD 982133159, Tallahassee, FL

Dear Mr. San Agustin:

I have received and reviewed your certification of liability insurance effective October 1, 1991 issued by National Union Fire Insurance Company for sudden and nonsudden coverage. This coverage satisfies the liability requirements of 40 CFR Part 264.147.

I have enclosed an updated copy of this form for your future use. If I can be of further assistance, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

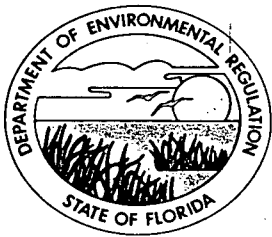
Enclosure

cc: Jeff Pallas, EPA
Bob Crawford, DER, Tampa
Bill Kellenberger, DER, Pensacola
Bob Kukleski, DER, West Palm Beach

D. E. R.

JAN 22 1992

SOUTHWEST DISTRICT
TAMPA



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

January 21, 1992

Mr. Victor San Agustin, P.E.
Regional Environmental Engineer, Tampa
Safety-Kleen Corporation
129 S. Kentucky Avenue, Suite 701
Lakeland, FL 33801

Re: Safety-Kleen, FLD 980 847 271
Operating Permit HO29-158820, Tampa Service Center

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has received your corporation's check of \$500.00 to cover permit processing fees subject to Chapter 17-4 of the Florida Administrative Code. The following minor modifications have been incorporated into your facility's application on file with the FDER.

1. New sealant for tank and container storage areas; and
2. Changes to container color coding system.

Do not hesitate to contact me at (813) 620-6100, ext. 389 should you have any further concerns.

Sincerely,

Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

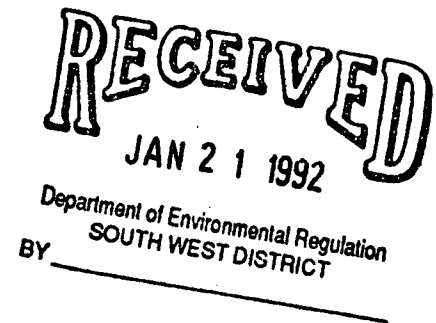
LRM/ab

cc: James Kutzman, EPA Region IV
Satish Kastury, FDER/Tallahassee
Catherine McCord, Safety-Kleen

*Draft Letter
approving
modifications*



January 20, 1992



Mr. William Crawford
Florida Department of
Environmental Regulation
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

RE: Class I Modifications - Safety-Kleen Corp., Tampa, Florida
FLD# 980847271

Dear Mr. Crawford:

Enclosed are six sets of replacement pages for the following Class I modifications.

1. Page II.A.4(b)-2. This page was missed during the color modification request included with the comments (dated 10/28/91) on the draft permit.
2. Pages I.D.2-2, II.B.3-2, and II.B.4-1. These pages inadvertently identified the five-gallon mineral spirits container as being steel. This was clarified with Ms. Lynn Milanian of FDER in Tampa prior to the issuance of the permit.
3. Attachment II.B.1 (page II.B.1-1) and Attachment II.A.4(b) (page II.A.4(b)-3) clearly indicated that containers will be palletized whenever possible; therefore, pages II.B.3-2, II.B.4-2, ^{change not made} II.A.5-4, and II.A.5-8 should read, "are stored on pallets whenever possible." Replacement pages are provided.
4. The industrial solvents (FRS) wastes may also be handled in 30-gallon drums. Replacement pages are I.D.2-3, II.A.5-4, II.A.5-8, II.B.3-2, and II.B.4-2. Likewise, spent antifreeze may be handled in 55-gallon drums. Replacement pages are I.D.2-4, II.A.4(b)-2, II.A.5-8, and II.B.4-1.
5. Replacement pages II.B.1-2 and II.C.7-2-1 are being provided to reflect the November 27, 1991 request for a change in coating materials. This request is being extended to include a request for "or equivalent" to be added along with Semstone.

Mr. William Crawford
January 20, 1992
Page -2-

6. The pallet configurations and stack heights are being altered as indicated on replacement pages II.A.4(b)-3 and II.B.1-1.
7. Addition of a pager number to the emergency coordinator list. Replacement pages are ii ^{Table} and II.A.4(b)-1 in Attachment II.A.4(b). ✓
8. The training program (Attachment II.A.4(e)) has been updated to the most recent Safety-Kleen corporate policy.
9. The Table of Contents has been updated to reflect changes in Items 1 through 8.

Per your conversation with Ms. Cindy Norton of Environmental Resources Management-South, Inc. (ERM) on January 17, 1992, you recently received two \$250 modification fees for these changes. One \$250 check is for the permit modification request for the Port Charlotte facility.

If you have any questions, please call me at (813) 682-8094.

Sincerely,



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

mmm/bai

Enclosure(s)

- c: S. Kastury - FDER, Tallahassee (letter only)
J. Kutzman - USEPA Region IV
C. Norton - ERM

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). These wastes are shipped in ³⁰ 55-gallon drums and are stored on pallets, *MISSING whenever possible*. It is anticipated that 39,000 gallons of spent mineral spirits, 158,000 gallons of spent halogenated solvents and 60,000 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

A typical composition, and chemical physical analysis for each of the waste streams 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 MINERAL SPIRITS

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

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



D. E. R.

December 20, 1991

JAN - 2 1992

U.S. EPA Region IV
Hazardous Waste
345 Courtland St. N.E.
Atlanta, Ga 30365

SOUTHWEST DISTRICT
TAMPA

Dear Sir/ Madam,

Enclosed you will find the 1990 Waste Minimization reports for the following Safety-Kleen facilities:

FLD980847214	Orange Park	3-079-01
FLD000776716	Pt Charlotte	3-163-02
FLD980847271	Tampa	3-163-01
FLD097837983	Altomonte Springs	3-130-01
FLD000776773	Tallahassee	3-079-02
FLD980840086	N. Miami	3-097-02
FLD984167791	Boynton Beach	3-097-01

If you have any questions, please contact Mr. San Augustin.

Sincerely,

Lori Sherry
Manifest Dept

cc: Referenced Branches
Victor San Augustin
Florida District Offices
file

792

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

Safety-Kleen Corp
3-163-01

EPA ID NO.

FL0980847271

U.S. ENVIRONMENTAL
PROTECTION AGENCY90
1989 Waste Minimization Report

FORM

IC

IDENTIFICATION AND
CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 6 of the 1989 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box ☒ in items A, B, D, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 6.

A. EPA ID No. Same as label <input type="checkbox"/> or <u>FL0980847271</u>		B. Site/company name Same as label <input type="checkbox"/> or <u>SAFETY-KLEEN CORP.</u>	
C. Has the site name associated with this EPA ID changed since 1987? <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No			
D. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label <input type="checkbox"/> or <u>5309 24th Ave South</u>			
E. City, town, village, etc. Same as label <input type="checkbox"/> or <u>Tampa</u>	F. County <u>Hillsborough</u>	G. State Same as label <input type="checkbox"/> or <u>FL</u>	H. Zip Code Same as label <input type="checkbox"/> or <u>33619</u>

SEC. II Mailing address of site. Instruction page 6.

A. Is the mailing address the same as the location address? <input type="checkbox"/> 1 Yes (SKIP TO SEC. III) <input checked="" type="checkbox"/> 2 No (COMPLETE SEC. II)		
B. Number and street name of mailing address <u>777 Big Timber Road</u>		
C. City, town, village, etc. <u>ELGIN</u>	D. State <u>IL</u>	E. Zip Code <u>60123</u>

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 6.

A. Please print: Last name <u>San Augustin</u>	First name <u>Victor</u>	M.I. 	B. Title <u>Regional Environmental Engineer</u>	C. Telephone <u>813 682-8094</u> Extension <u> </u>
---	-----------------------------	----------	--	--

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 7.

A. <u>7389</u>	B. <u>5169</u>	C. <u>5172</u>	D. <u>5013</u>
----------------	----------------	----------------	----------------

SEC. V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Number of form pages submitted Form IC: <u>2</u> Form WM: <u>0</u>			
B. Please print: Last name <u>Kasko</u>	First name <u>William</u>	M.I. <u>P.</u>	C. Title <u>Vice President, Operations</u>
D. Signature <u>William P. Kasko</u>			E. Date of signature <u>12 69</u> MO. DAY

Page 1 of 2

Sec. VI Waste Minimization Activity during 1988 or ~~1989~~ 1990

A. Did this site begin or expand a source reduction activity during 1988 or 1989?
Instruction page 8

- ☐ 1 Yes
☒ 2 No

B. Did this site begin or expand a recycling activity during 1988 or 1989?
Page 8

- ☐ 1 Yes
☒ 2 No

C. Did this site conduct a source reduction or recycling opportunity assessment during 1988 or 1989?
Page 8

- ☐ 1 Yes
☒ 2 No

D. What factors have limited this site from initiating new source reduction activities during 1988 or ~~1989~~ 1990
(CHECK ALL THAT APPLY)
Page 8

None

- ☐ 01 No factors have limited new source reduction activities.
☐ 02 Insufficient capital to install new source reduction equipment or implement new source reduction practices.
☐ 03 Lack of technical information on source reduction techniques, applicable to my specific production processes.
☐ 04 Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
☐ 05 Concern that product quality may decline as a result of source reduction.
☐ 06 Technical limitations of the production processes.
☐ 07 Permitting burdens.
☐ 08 Other (SPECIFY IN COMMENTS)

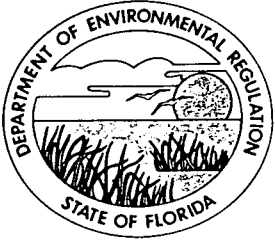
E. What factors have limited this site from initiating new on-site or off-site recycling activities during 1988 or ~~1989~~ 1990
(CHECK ALL THAT APPLY)
Page 8

None

- ☐ 01 No factors have limited new recycling activities.
☐ 02 Insufficient capital to install new recycling equipment or implement new recycling practices.
☐ 03 Lack of technical information on recycling techniques applicable to this site's specific production processes.
☐ 04 Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
☐ 05 Concern that product quality may decline as a result of recycling.
☐ 06 Requirements to manifest wastes inhibit shipments off site for recycling.
☐ 07 Financial liability provisions inhibit shipments off site for recycling.
☐ 08 Technical limitations of product processes inhibit shipments off site for recycling.
☐ 09 Technical limitations of production processes inhibit on-site recycling.
☐ 10 Permitting burdens inhibit recycling.
☐ 11 Lack of permitted off-site recycling facilities.
☐ 12 Unable to identify a market for recyclable materials.
☐ 13 Other (SPECIFY IN COMMENTS)

Comments:

Safety-Kleen's business is the collection and recycling of waste solvents generated by it's customers, most of whom are SQG's. This facility collects the waste solvents, stores them for a short period, then shipsthem to a Company operated reclamation facility. Over the years, more and more wastes will pass through this facility as more generators choose the recycling option.



Florida Department of Environmental Regulation

Southwest District

• 4520 Oak Fair Boulevard •

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

December 17, 1991

Mr. Victor San Agustin
Regional Environmental Engineer, Tampa
Safety-Kleen Corporation
129 S. Kentucky Avenue, Suite 701
Lakeland, FL 33801

Re: Safety-Kleen, FLD 980 847 271
Operating Permit HO29-158820, Tampa Facility
Requested Minor Modifications

Dear Mr. San Agustin:

The Florida Department of Environmental Regulation (FDER) has received correspondence from your corporation notifying that a change in sealant for tank and container storage areas and a change in the container color coding system is in effect.

As these modifications are considered minor, in accordance with Chapter 17-4, F.A.C. for processing fees, the FDER will anticipate receipt of the appropriate amount (\$250.00) within 30 days of receipt of this notice to cover these 2 modifications.

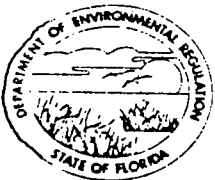
We appreciated your providing the revised application pages to reflect these changes in the original application. Do not hesitate to contact me should you have any further concerns.

Sincerely,

Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: James Kutzman, EPA Region IV
Satish Kastury, FDER/Tallahassee
Catherine A. McCord, Safety-Kleen



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
THRU: Bill Crawford *BC*
FROM: Lynne R. Milanian *lynne 12/10*
DATE: December 10, 1991
SUBJECT: Safety-Kleen Corp., FLD 980 847 271
Tampa Service Center HO29-158820
Notice of change in protective sealant

Attached please find documents submitted December 9, 1991 by the referenced facility which are supplement to the subject permit.

This package includes information detailing:

1. 1 cover letter and documents explaining benefits
of new sealant which should be placed in your
original permit application in Section II-B.
2 copies provided.

LRM/ab
Attachment

cc: James Kutzman, EPA Region IV



EASTERN DIVISION

D. E. R.

November 19, 1991

DEC 3 1991

SOUTHWEST DISTRICT
TAMPA

Ms. Lynn Milanian
Florida Department of
Environmental Regulation-Tampa
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Safety-Kleen Corp. Permit Modification; Tampa, Florida--EPA ID #FLD980847271

Dear Ms. Milanian:

Enclosed is a Class I permit modification for Safety-Kleen Corp.'s Tampa, Florida facility, Branch 3-163-01. This facility is currently operating under Permit H029-88820, which becomes effective on November 1991. 158820

This modification involves the container (drums) color coding system in Safety-Kleen's permit application. Safety-Kleen intends to continue to use a drum color scheme as part of its waste management system, but wants the flexibility to change drum colors when necessary. This modification removes all references to specific drum colors in the permit.

In a October 10, 1991 telephone conversation between Lynn Milanian of the Florida Department of Environmental Regulation and Cynthia Norton of Environmental Resources Management-South, Inc.(ERM), it was confirmed that changed pages or a new application is not required for this modification and submission. In the near future, Safety-Kleen will be making such changes.

13112.00/01/EASTLTR.(1)

Ms. Lynn Milanian
November 19, 1991
Page -2-

In accordance with Class I permit modification procedures, Safety-Kleen Corp. is providing this notice to both the State of Florida and U.S. EPA's Region IV office and the modification is immediately being implemented. Safety-Kleen is also mailing notices to interested parties that are on the informational mailing list for the above-mentioned facility.

Please contact Victor San Agustin at (813) 682-8094 or Catherine McCord at (703) 757-7516 if there are any questions regarding this matter.

Sincerely,



Catherine A. McCord
Eastern Division

pjh

c: S-K Regional Manager - Stockbarger
S-K Branch Manager - Frank Taylor
S-K Regional Environmental Engineer - Victor San Agustin
S-K Permit Writer
ERM
Permit File

Kent Williams
USEPA Region IV
325 Courtland Street, NE
Atlanta, GA 30365



H029-158820

AI, 6-g

CERTIFIED MAIL-RETURN RECEIPT

November 27, 1991

D. E. R.

DEC 2 1991

SOUTHWEST DISTRICT
TAMPA

Mr. William Crawford
Waste Management Permitting
Florida Department of
Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Safety-Kleen Corp. Tampa, Florida Operating Permit--Class I Modification--
FLD#980847271, Branch #3-163-01

Dear Mr. Crawford:

Safety-Kleen Corp. (Safety-Kleen) is submitting a notice of a Class I permit modification as required under Chapter 17-730, Florida Administrative Code (FAC). Safety-Kleen intends to reseal the existing tank farm and return/fill shelter with Semstone 140 and the container storage areas in both the service and accumulation centers with Semstone 245. The operating permit application identified Sika-gard 62 as the coating which would be used in these areas. Safety-Kleen has evaluated the Sika-gard and Semstone products and determined that the Semstone is equivalent, if not more resistant, to the chemicals managed in the tank farm, return/fill shelter, and container storage areas.

Safety-Kleen has determined that this is a Class I modification according to modification A.3 in Appendix I of 40 CFR 270.42, equipment replacement with functionally equivalent components. In accordance with Class I permit modification procedures, Safety-Kleen is providing this notice to the State of Florida. This modification will begin implementation as early as December 2, 1991.

coating material placed in applic. under
PART II B

13112.19/01/WC112591.LTR

Mr. William Crawford
November 27, 1991
Page -2-

If you have any questions or comments, please contact me at (813) 682-8094.

Sincerely,

A handwritten signature in cursive script, reading "Victor L. San Agustin".

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

pjh/mmm

c: C. Norton - ERM



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

November 14, 1991

Carol M. Browner, Secretary

Mr. Victor San Agustin
Regional Environmental Engineer, Tampa Region
Safety-Kleen Corporation
129 S. Kentucky Avenue, Suite 701
Lakeland, Florida 33801

RE: Workshop to Discuss Issuance/Modification of State Permits
for Managing TC Wastes

Dear Mr. San Agustin:

The State of Florida adopted the Toxicity Characteristic (TC) test in the recently revised 17-730 rule. In order to clarify the relationship between your status with EPA and state permitting requirements, you are invited to attend a workshop to be held on December 13, 1991 at the Roadway Inn in Orlando. The workshop will cover the impact of the newly adopted rule on regulated facilities, state permitting procedures for either permit issuance or modification and revised hazardous waste permit fees.

In order to assist us in planning for adequate facilities and materials, please let us know who will be attending from your facility by December 4, 1991. A registration form is enclosed. A copy of workshop materials will be provided on disk in Word Perfect format. If necessary, printed copies can be provided after the workshop. An agenda for the workshop is attached. There is no fee for attending the workshop.

The telephone number for reservations at the Roadway Inn is 1-800-826-4847. You should request the room rate for the TC Workshop. The Inn is located at 9956 Hawaiian Court just off International Drive.

If you have any questions or need additional information on the workshop, please call Mr. Doug Outlaw at 904/488-0300.

Sincerely,

Bill Neimes

for

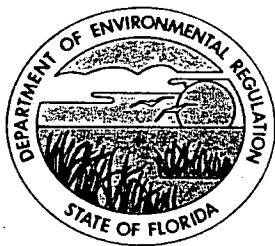
Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/DGO/rz

Enclosures

cc: Jim Kutzman, EPA/Region IV
District Program Administrators





Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

November 13, 1991

Carol M. Browner, Secretary

Ms. Ellen J. Jurczak, Professional Engineer
Environmental Permit Manager
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

RE: Workshop to Discuss Issuance/Modification of State Permits
for Managing TC Wastes

Dear Ms. Jurczak:

The State of Florida adopted the Toxicity Characteristic (TC) test in the recently revised 17-730 rule. In order to clarify the relationship between your status with EPA and state permitting requirements, you are invited to attend a workshop to be held on December 13, 1991 at the Roadway Inn in Orlando. The workshop will cover the impact of the newly adopted rule on regulated facilities, state permitting procedures for either permit issuance or modification and revised hazardous waste permit fees.

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Sincerely,

Bill Neimes

for Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

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Enclosures

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