

Safety-Kleen Tampa H029-158820 (File No. 2)

FF-02/86

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

NO.	DATE	TO	FROM	REFERENCE
55		L. Milamian	D. Outlaw	
90	Jun 14	Det tmp	Det tall	Comments on draft HO
56				
90	Oct 15	File		Sequence of events outline
57		D. Garrity	P. Garvin	
90	Nov 8	Det tmp	Attorney	Mitigation of existing notice
58		S. Kastury	L. Milamian	
90	Nov 21	Det tall	Det tmp	Fyi copy of (57/90)
59		L. Clark	J. Hartline	
90	Dec 10	Det tall	Safety	Closure cost estimates
60		Grantidwell	E. Surzak	
90	Dec 17	ERA	Safety	TC waste codes w/analysis
61		L. Milamian	F. Bickle	
90	Dec 13	Det tmp	ERM	requesting rpt to Dec 12 sub. data
62			D. Outlaw	
91	Mar 22	File	Det tall	Dumpsters/Barrel washer - consider as TANK
63		W. Crawford	F. Bickle	
91	May 20	Det tmp	ERM	Revised permit appl. submitted
64		S. Kastury	B. Crawford	
91	May 21	Det tall	Det tmp	Fyi copy of (63/91)
65		Attorney - Garvin	B. Krawns	
91	Jun 6	Safety	Det tmp	copy of revised C.O.
66		S. Kastury	L. Milamian	
91	Jun 26	det tall	det tmp	Provide comments on draft HO
67		File		
91				minutes on revised appl (62/91)
68				
91	File			meeting attendees & Agenda
69		L. Milamian	J. Griffith	
91	July 2	det tmp	det tall	comments on (66/91)
70		J. Scarborough	M. Hlebasko	
91	July 5	ERA IV	Safety	TLRA air emission tests
71		L. Milamian	C. Norton	
91	Aug 9	det tmp	ERM	response to July 25 meeting (68/91)
72		L. Milamian	C. Norton	
91	Aug 15	det tmp	ERM	handling of rainwater w/in tank dke
73		J. Hartline	L. Clark	
91	Aug 20	Safety	det tmp	Financial resp are all approved
74		S. Kastury	L. Milamian	
91	Aug 14	det tall	det tmp	Appl. completed forms
75		File		
91	Aug 15			cover report
76		V. SanAugustin	J. Scarborough	
91	Aug 15	det tmp	ERA	draft H029A
77		L. Fore	L. Milamian	
91	Aug 20	Safety	det tmp	Appl complete on Aug 15, 1991
78		J. Hartline	L. Milamian	
91	Aug 28	Safety	det tmp	Activation of Fire Sprinkler System
79		E. Surzak	L. Milamian	
91	Sept 5	Safety	det tmp	Provide solution to possible releases to environ.
80		W. Crawford	M. Hlebasko	
91	Sept 18	det tmp	Safety	Proof of Publication
81		V. SanAugustin	J. Hartline	
91	Sept 30	det tmp	Safety	report of spill
82		W. Crawford	M. Hlebasko	
91	Oct 10	det tmp	Safety	Proof of Broadcast
83		S. Kastury	L. Milamian	
91	Oct 11	det tall	det tmp	Fyi copy of (82/91)
84		J. Scarborough	M. Hlebasko	
91	Oct 1	ERA	Safety	Notice of reg. winter activity form
85		L. Milamian	C. Norton	
91	Oct 15	det tmp	ERM	Notice of change of container color
86		J. Dickinson	S. Kastury	
91	Oct 15	ERA	det tall	inspection dates for FL facilities
87		L. Milamian	D. Green	
91	Oct 17	det tmp	Safety	Sample work plan for possible releases

FF-02/86

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

NO.	DATE	TO	FROM	REFERENCE
88		S. Kastury	L. Milanian	
91	Oct 17	der tall	der tmp	Fyi copy of 87/91
89		W. Crawford	M. Hlebasko	
91	Oct 24	DER TMP	SAFETY	BAD FAX - comments on draft permit
90		W. Crawford	M. Hlebasko	
91	Oct 28	DER TMP	SAFETY	BETTER FAX - " " " "
91		W. Crawford	M. Hlebasko	
91	Oct 30	DER TMP	SAFETY	HARD COPY OF " " " "
92		M. Hlebasko	L. Milanian	
91	Nov 5	SAFETY	DER TMP	response to 91/91
93		B. Kukleski	L. Milanian	
91	Nov 8	DER WPB	DER TMP	FAX ON PROCESS DESCRIP & WASTE CODES
94		L. Milanian	M. Hlebasko	
91	Nov 13	DER TMP	SAFETY	revisions to APP'L PAGES
95		S. Kastury	L. Milanian	
91	Nov 19	DER TMP	DER TMP	Fyi copy of 94/91
96		E. Jurezak	S. Kastury	
91	Jan 75	der tall	der tall	cannot operate on a transfer station
97		B. Crawford	V. San Agustin	
92	Feb 13	der tmp	der tall	request time ext. for waste min. submittal
98		R. Synder	V. San Agustin	
92	Feb 25	der tall	der tall	request computer printout to be taken to LG or SGG
99		V. San Agustin	S. Kastury	
92	Nov 30	SAFETY	DER - Tallah.	'operating records' vs 'written record'
100		L. Milanian	V. San Agustin	
92	Dec 22	DER - TPA	SAFETY	Copy of latest training program
1				
93	Jan 21	B. Crawford	L. Milanian	
		SAFETY	DER - TPA	Faxed copy of receipts
2		S. Kastury	L. Milanian	
93	Jan 25	DER - Tallah.	DER - TPA	Update to Emergency contact list and subpart BB
3		V. San Agustin	W. Bastwick	
93	Jan 28	SAFETY	DER	Seminole County - Storage tanks
4		D. Goff	V. San Agustin	
93	Feb 8	Fire Marshall's Office	SAFETY	Fire suppression system installation
5		L. Milanian	V. San Agustin	
93	Mar 30	DER - TPA	SAFETY	Major and minor permit modifications
6		S. Kastury	L. Milanian	
93	April 2	DER - Tallah.	DER - TPA	Fyi - see 5/93
7		A. Farmer	S. Kastury	
93	April 15	EPA	DER - Tallah.	Safety Kleen premium solvent proposal
8		L. Milanian	V. San Agustin	
93	April 15	DER - TPA	SAFETY	Revised copies of Figures II.B.i-2 & II.B.i-3
9		S. Kastury	L. Milanian	
93	April 16	DER - Tallah.	DER - TPA	Fyi - see 8/93
10		File	M. Hatcher	
93	April 20		DER - Tallah.	E-mail: Safety-Kleen permit mod. - "Premium Solvent"
11		L. Milanian	V. San Agustin	
93	April 26	DER - TPA	SAFETY	Application for minor mod. to operating permit
12		V. San Agustin	S. Kastury	
93	April 27	SAFETY	DER - Tallah.	Comments on "Premium Solvent"
13		L. Milanian	V. San Agustin	
93	April 29	DER - TPA	SAFETY	Info. concerning two activities performed at Tampa facility
14		S. Kastury	L. Milanian	
93	April 30	DER - Tallah.	DER - TPA	Fyi - see 11/93
15		S. Kastury	L. Milanian	
93	April 30	DER - Tallah.	DER - TPA	Fyi - see
16		R. Garrity	L. Milanian	
93	July 13	DER - TPA	DER - TPA	Permit mod. to store non-RCRA waste Actrol Parts Washer
17		G. Senti	V. San Agustin	
93	July 22	DER - TPA	SAFETY	Expansion of manager's office area in accumulation center
18		L. Milanian	V. San Agustin	
93	July 23	DER - TPA	SAFETY	Proof of newspaper publication & radio announcement
19		L. Milanian	V. San Agustin	
93	Aug 1	DER - TPA	SAFETY	Change in wording request

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

FF-02/86

PERMIT COVER MEMO

TO: RICK GARRITY, DIRECTOR OF DISTRICT MANAGEMENT

FROM/THROUGH:

WV 8/25/93

William Kutash, PROGRAM ADMINISTRATOR
Gary Santti, PROFESSIONAL ENGINEER II
Lynne R. Milanian, DISTRICT PERMITTING ENGINEER

John 8/12

DATE: August 11, 1993

FILE NAME: Safety Kleen Corporation
PROGRAM : Hazardous Waste

PERMIT #: HO29-158820
COUNTY Hillsborough

6-j

TYPE OF PERMIT ACTION: X PERMIT MODIFICATION MINOR

PUBLIC NOTICE PERIOD CLOSED? N/A

PERMIT SUMMARY: The Tampa Service Center is currently authorized to store hazardous wastes in containers and tanks. The center acts as a storage location for the various waste types until enough material has been gathered from customers to warrant a shipment to the Corporate treatment recycling facility. Safety Kleen has proposed storage of non-RCRA waste Actrel® Parts Washer (which is a degreasing solvent similar to mineral spirits) in the RCRA storage tank currently containing the spent mineral spirits and has proposed collection and temporary storage of spent filter cartridges serving both mineral spirits parts washer units as well as Actrel® parts washer units.

PROFESSIONAL RECOMMENDATION: X APPROVE DENY

EVALUATION SUMMARY: As the mineral spirits and the Actrel® Parts Washer are compatible this mixing of the two will not effect the current waste stream. Actually the Actrel® Parts Washer is almost identical to the mineral spirit waste except that it has a flash point of greater than 140 degrees F which is the criteria for establishing a characteristically hazardous waste due to ignitability. Treatment of the Actrel® Parts Washer will be identical to mineral spirit treatment which involves distillation at Safety-Kleen's parent corporation. Collection and temporary storage of the two types of spent filter cartridges will greatly benefit environmental protection as these devices will be kept from entering our solid waste landfills and instead, be recycled for used solvent and scrap metal.

RCRA permit modifications are not subject to any time clocks.

skcovm2.doc



August 2, 1993

Hand Delivered

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

RECEIVED
AUG 01 1993

Department of Environmental Regulation
SOUTH WEST DISTRICT
BY _____

Subject: Minor Modification Approvals Dated
April 30 and July 14, 1993;
Tampa Facility, Permit HO29-158820;
EPA ID No. FLD 980 847 271

Dear Ms. Milanian:

Per my discussion with Mr. Gary Santti of your office on July 30, 1993, the purpose of this letter is to request a change in the wording of the above referenced approvals. Copies of these approvals are enclosed.

Specifically, Safety-Kleen requests that the term "Premium Solvent 140" be changed to "Premium Solvent". The Premium Solvent Material Safety Data Sheet and permit application replacement pages which we provided with our permit modification request for Premium Solvent dated March 5, 1993 shows a flash point of 148°F, not 140°F. We believe the confusion came from a March 12, 1993 letter to Bill Kutash which included TCLP test data on Safety-Kleen's 140 solvent. Our March 12 letter however did identify 148°F as being the flash point of Premium Solvent. I have also enclosed a copy of the March 12 letter.

This clarification was also requested during a May 5 meeting between Bill Crawford and yourself at the Department's Tampa office.

This matter is very important to Safety-Kleen's operations. Clarification will be most appreciated. If I can be of any assistance, please call me at (813)682-8094.

Sincerely,

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



Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

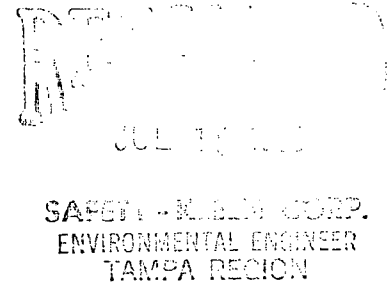
Tampa, Florida 33619

Virginia Wetherell, Secretary

JUL 14 1993

CERTIFIED MAIL

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



Re: ***Safety-Kleen Corporation, FLD 980 847 271
Operating Permit H029-158820 Tampa Facility
Request to Modify Permit Conditions***

Dear Mr. San Agustin:

We are in receipt of your request for minor modifications of the permit application and the permit conditions. The Florida Department of Environmental Protection (FDEP) approves your request to accept waste Actrel® parts cleaner and the associated spent filters at the facility service center. The waste Actrel® parts cleaner will be mixed in the bulk used parts washer tank when it arrives at the service center. The spent filters will be placed in the waste sludge accumulation container located at the wet dumpsters.

At this time the FDEP has not determined the regulatory status of the waste Actrel® parts cleaner and the associated spent filters. Until the FDEP makes such a determination Safety-Kleen is to transport and handle the waste Actrel® parts cleaner and the associated spent filters in the same manner as other hazardous waste. Those revisions to the application narrative have been noted via replacement of original application pages. Those revisions requiring changes to permit conditions are noted as follows:

JUL 14 1993

CONDITION

Management of parts cleaner.

FROM

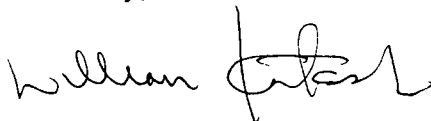
Authorized placement of spent mineral spirits and spent premium solvent 140 into one of three dumpster tanks and storage of spent mineral spirits and spent premium solvent 140 in the same 15,000 gallon hazardous waste storage tank.

TO

Authorized placement of spent mineral spirits, spent premium solvent 140, and Actrel® parts cleaner into one of three dumpster tanks and storage of spent mineral spirits, spent premium solvent 140, and Actrel® parts cleaner in the same 15,000 gallon hazardous waste storage tank.

This letter must be attached to your permit and shall become a part of that permit.

Sincerely,

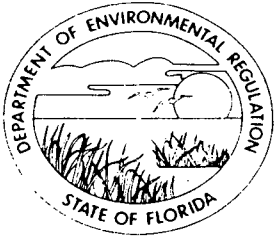


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

lrm

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee
Beth Knauss, Compliance/Enforcement, FDEP - Tampa

skpermod.doc



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

APR 30 1993

CERTIFIED MAIL

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

RECEIVED

MAY 03 1993

SAFETY-KLEEN CORP.
ENVIRONMENTAL ENGINEER
TAMPA REGION

Re: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit H029-158820 Tampa Facility
Request to Modify Permit Conditions

Dear Mr. San Agustin:

We are in receipt of your request for minor modifications of the permit application and the permit conditions. The Florida Department of Environmental Regulation (FDER) approves your request to accept waste premium solvent at the facility service center. The waste premium solvent will be mixed in the bulk used parts washer tank when it arrives at the service center. At this time the FDER has not determined the regulatory status of the waste premium solvent. Until the FDER makes such a determination Safety-Kleen is to transport and handle the waste premium solvent in the same manner as other hazardous waste. Those revisions to the application narrative have been noted via replacement of original application pages. Those revisions requiring changes to permit conditions are noted as follows:

CONDITION

Management of spent mineral spirits.

FROM

Placement of only spent mineral spirits into one of three dumpster tanks and storage of spent mineral spirits only in the 15,000 gallon hazardous waste storage tank.

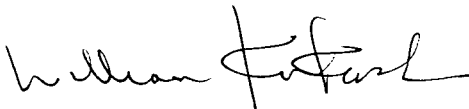
APR 30 1993

TO

Authorized placement of spent mineral spirits and spent premium solvent 140 into one of three dumpster tanks and storage of spent mineral spirits and spent premium solvent 140 in the same 15,000 gallon hazardous waste storage tank.

This letter must be attached to your permit and shall become a part of that permit.

Sincerely,


for Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

lrm

cc: Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee
Beth Knauss, Compliance/Enforcement, FDER - Tampa

modlet.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

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,



f 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 PROTECTION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

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

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 8/10*

DATE: August 6, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Comments on Draft Major Permit Modification

Attached, please find correspondence dated July 21, 1993 and submitted July 21, 1993 which is subject to the referenced permit. The package includes the following items:

1. One five page letter discussing changes to permit language that Safety-Kleen would like made.

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

State of Florida
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

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

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *lyne 8/5*

DATE: August 2, 1993

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

Attached, please find correspondence dated August 2, 1993 and submitted August 1, 1993 (How about that) which is subject to the referenced permit. The package includes the following items:

1. One single page cover letter requesting that references to Premium Solvent 140 be changed to "Premium Solvent". Two Attachments detailing the old permit language for which the requested change has been made.

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



July 22, 1993

D.E.R.

Project No. 1311335.19

JUL 23 1993

Ms. Lynn Millanian
Florida Department of
Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

SOUTHWEST DISTRICT
TAMPA


RE: Proof of Publication and Radio Announcement; Safety-Kleen, Tampa, Florida, Major
Modification, FLD980847271

Dear Lynn:

Attached are the proof of newspaper publication and radio announcement for the Major
Modification for the above-referenced facility.

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

bai/pjh

Enclosure(s)

c: Cindy Norton - ERM

13113.19/01/072293LM.LTR/3

THE TAMPA TRIBUNE

Published Daily

REC'D JUL 15 1993

Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared
R. Putney, who on oath says that he is Accounting Manager of The Tampa
Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida;
that the attached copy of advertisement being a

LEGAL NOTICE

D.E.R.

in the matter of

PUBLIC NOTICE

JUL 23 1993

was published in said newspaper in the issues of
JULY 10, 1993

SOUTHWEST DISTRICT
TAMPA

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has heretofore
been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publication
of the attached copy of advertisement; and affiant further says that he has
neither paid nor promised any person, firm, or corporation any discount, rebate, commission
or refund for the purpose of securing this advertisement for publication in the
said newspaper.

R. Putney

Sworn to and subscribed before me, this 13 day

of JULY 10, 1993

Ima S Kennedy

(SEAL)

PUBLIC NOTICE OF PROPOSED AGENCY ACTION
Newspaper Publication
FLORIDA DEPARTMENT
OF ENVIRONMENTAL
REGULATION
3804 Coconut Palm Drive
Tampa, Florida 33619-8318
813/744-6100

THE FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION (FDER) GIVES NOTICE OF ITS INTENT TO ISSUE A MAJOR PERMIT MODIFICATION UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), AS AMENDED BY THE HAZARDOUS AND SOLID WASTE AMENDMENTS OF 1984 (HSWA), SECTION 403.722, FLORIDA STATUTES (FS), AND CHAPTERS 17-4 AND 17-730 OF THE FLORIDA ADMINISTRATIVE CODE (FAC) TO Safety Kleen Corporation for the storage of additional waste codes at the existing hazardous waste tank and container storage facility located at 5309 24th Avenue and 54th Street, Tampa, Hillsborough County, Florida, having assigned facility I.D. number FLD 980 847 271. The permit modification, is issued, will be the State permit which covers the RCRA program that was in effect prior to the passage of the HSWA. The Environmental Protection Agency (EPA) and Florida Department of Environmental Regulation (FDER) have determined that there are no additional evidences of releases of hazardous waste or constituents from solid waste management units (SwMUs) at this facility that have not already been identified. Therefore, at this time, Section 3004(u) of the Hazardous and Solid Waste Amendments (HSWA) of 1984 does not apply. The only provisions of HSWA which apply to the facility are the Section 3005(h) waste minimization certification and Section 3004(d) Land Disposal Restriction requirements, which have been incorporated into the existing State operating permit. If new information becomes available indicating that Section 3004(u) of HSWA applies, the HSWA permit may be reopened.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

A draft modified permit, prepared in accordance with the provisions of Chapter 17-730

FAC, contains the conditions for the operation of a hazardous waste storage container and tank facility.

The new hazardous wastes to be stored at the facility are Fluid Recovery Service (FRS) wastes which are designated by the following EPA Waste Code Numbers: D001 and D002, F001, F002, F003, F004, F005, F006, F019, F024, F039, K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K099, K010, K011, K013, K014, K015, K002, K003, K004, K005, U001, U002, U003, U009, U019, 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 and TCLP SubCharacteristics D004 through D011, D018, D019, D021 through D030 AND D032 through D043.

The remaining new hazardous waste source is spent antifreeze (ethylene glycol) which is designated by EPA Waste code Numbers for TCLP SubCharacteristics D004 through D011, D018, D019, D021 through D030 and D032 through D043.

The application and a copy of the proposed permit are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at either:

Florida Department of
Environmental Regulation
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8318
(813) 744-6100

OR

Florida Department of
Environmental Regulation
Hazardous Waste Permitting
Section
2600 Blair Stone Road
Tallahassee, Florida
32399-2400
(904) 488-0300.

Any interested person may submit written comments on this proposed State agency action to the address shown above, within forty-five (45) days of publication of this notice. All comments on the facility will be considered by the Department in formulating a decision on issuing this permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, FS, and Chapters 17-103, and 28-5, FAC. Petitions must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within forty-five (45) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the time of filing. Failure to file a request for hearing within this time frame shall constitute a waiver or any right such person may have to request a hearing under Section 120.57, FS, or a meeting under Section 403.722(10), FS.

A petition for formal or informal administrative hearing pursuant to Section 120.57, FS, shall contain the following information: (a) The name, address, and telephone number of each petitioner. If the petitioner challenges a Department action or proposed action on a permit application, the application's name and address, the Department Permit File Number and the county in which the project is proposed, shall also be included; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A

statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of those material facts (i.e., those facts upon which the Department's action or proposal is based) disputed by petitioner. If no facts are disputed, petitioner shall so state; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition on the Department's permit is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Persons whose substantial interests have been affected by any decision of the Department have the right to intervene in the proceeding. A petition for intervention must be filed pursuant to Section 28-5.207, FAC, at least five (5) days before the final hearing. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, FS.

3417

7/10/93

WFLA SPORTSRADIO 910
7201 EAST HILLSBOROUGH AVE
TAMPA, FL 33610

AFFIDAVIT OF SERVICE RENDERED

State of

SS:

County of _____

The Undersigned Having Been Duly Sworn,
Deposes and Says That Broadcasting Service
Has Been Rendered by Radio Station
In Accordance With the Accompanying
Statement:

By

Norma J Jewell

Subscribed and Sworn to Before

Me this 12... day of JULY... 19.93

NOTARY PUBLIC

Susan Harmon

My Commission Expires

INVOICE AND STATEMENT

ERM-SOUTH, INC.
9501 PRINCESS PALM AVENUE
SUITE 100
TAMPA, FL 33619

ATTN: DONNA OZOC

BILLING DATE JULY 12, 1993

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO. RUN	RATE	AMOUNT
7/12/93	Public Notice of Proposed Agency Action Radio Announcement Florida Department of Environmental Regulation	3½	1	\$ 250.00	\$ 250.00
	D.E.R. JUL 23 1993 SOUTHWEST DISTRICT TAMPA				

Finance Charge is computed by a **PERIODIC RATE OF 1½% PER MONTH**, which is an **ANNUAL PERCENTAGE RATE OF 18%**, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER
\$ 250.00			\$ 250.00



July 22, 1993

Hand Delivered On
July 22, 1993

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

D. E. R.

JUL 22 1993

**SOUTHWEST DISTRICT
TAMPA**

RE: Safety-Kleen, Corp., Tampa FLD 980 847 271
Operating Permit HO29-158820
Modification of the Managers Office (Accumulation Center)

Dear Mr Santti:

This letter is being submitted to confirm information and opinions expressed in conversation between Bill Crawford of Safety-Kleen and Lynn Milanian of your office regarding the expansion of the managers office area in the accumulation center of the Tampa Facility.

Inclosed are several drawings from the permit application that show the proposed modifications to the accumulation center office area. As these modifications do not alter the hazardous waste storage area (increase or decrease capacity or alter storage arrangements) or restrict the movement of hazardous waste in the storage area, Safety-Kleen understands that this does not constitute a modification of the permit.

The drawings in the permit application that depict the office area in the accumulation area will be revised after the modifications are completed, and these updated pages will be supplied to the FDEP for inclusion in the permit application.

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

Sincerely,

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

*Does not
affect accumulation
center?*
*Does not
affect storage
area?*

Enclosure

c: C. Norton - ERM, South
F. Blickle - Blasland, Bouck & Lee

bc. C. McCord, EHS/Eastern Division (Elgin File I.c)
A. Seyfer, Regional Manager
J. Davis, Operations Manager
W. Schlender, Branch Manager
Regional File - I.c

DATE 6/21/93 NO. BY GREGORY R. TRACYSUBJECT TAMPA A/C OFFICE
ADDITIONFOR VICTOR SAN AGUSTIN

An AFE has been approved to expand the A/C offices including the mezzanine and to upgrade the 2 interior walls (to A/C storage) of the entire office to 2 hour fire rating.

Attached are two revised drawings from the TAMPA A/C Part B as well as ~~two~~ several more detailed drawings of the office itself.

The more detailed drawings show the expansion:

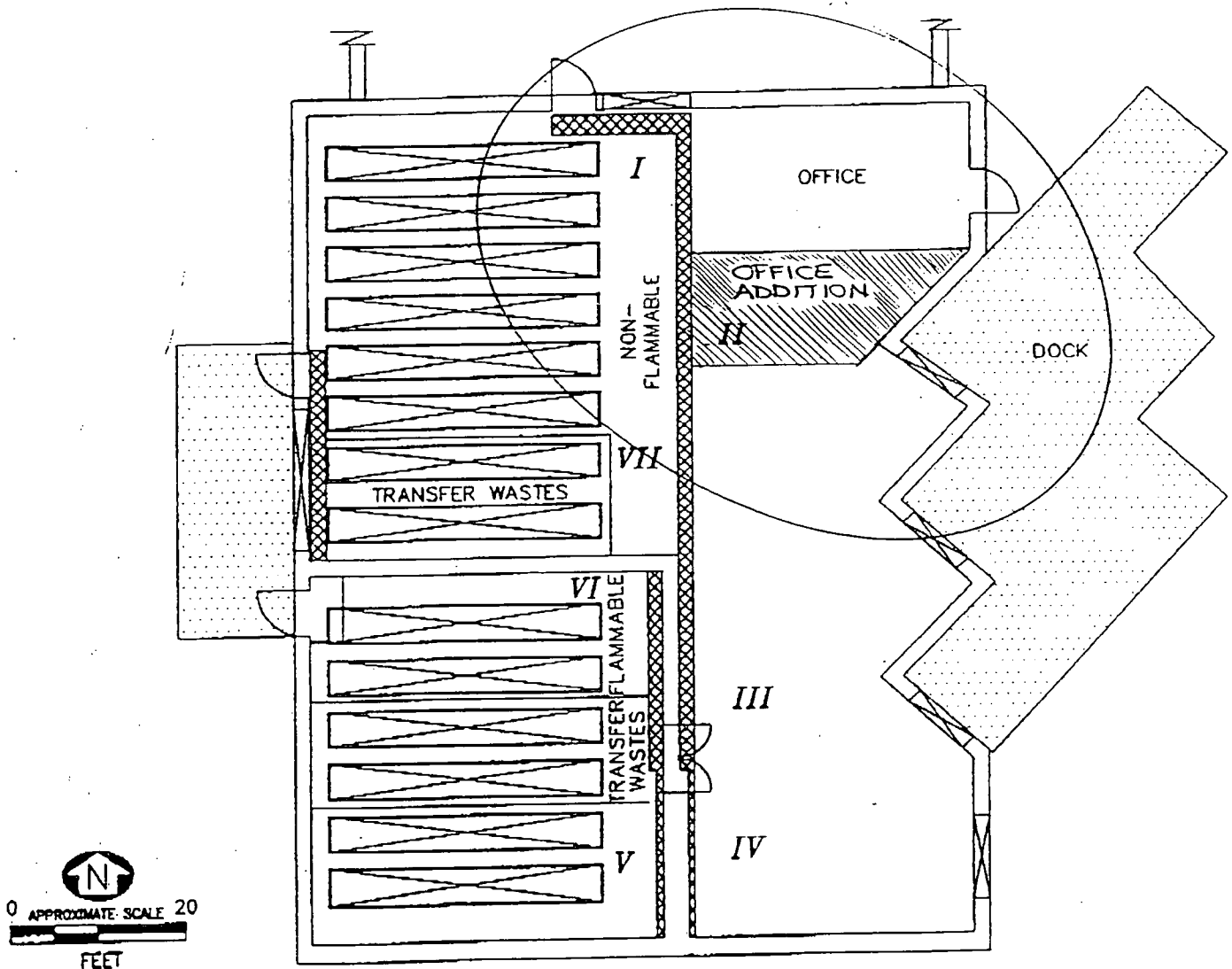
- ① the mezzanine stairs is completely enclosed by the office area.
 - ② exit from office into A/C has been changed from out the side to out the back.
 - ③ the mezzanine area becomes completely enclosed from the A/C storage by the 2 hour fire wall which runs from the A/C floor to the building ceiling which brings the office into compliance with the SBACA building code.
- This mezzanine area will be left unfinished initially but will be available for expansion when needed.
- ④ the additional office space downstairs will be sprinklered. The mezzanine or second floor is already sprinklered by the existing A/C system.

RECEIVED

JUN 25 1993

SAFETY-KLEEN CORP.
ENVIRONMENTAL ENGINEER
TAMPA REGION

Figure II.B.1-3
 Container Storage Area (South Building)
 Safety-Kleen Corp. Facility
 Tampa, Florida



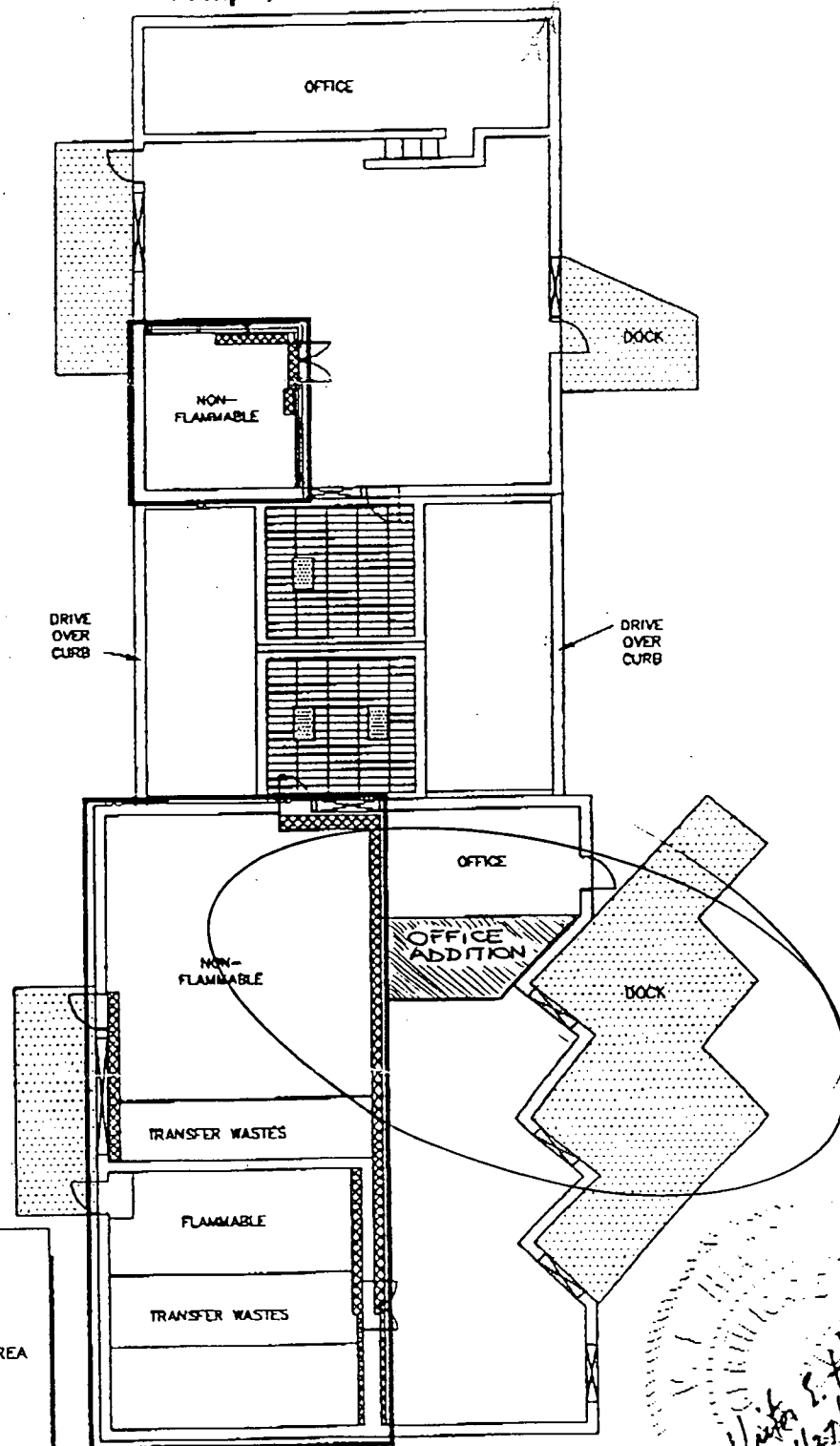
LEGEND

- | | |
|--|--------------------|
| | ROLL-UP DOOR |
| | TRENCH |
| | ROWS OF CONTAINERS |

NOTE:

- 1) TRANSFER WASTE HOLDING AREAS MAY EXPAND DEPENDING ON THE AMOUNT OF TRANSFER WASTES ARRIVING AT THE FACILITY
- 2) TRANSFER WASTE VOLUMES ARE INCLUDED IN CALCULATING TOTAL ACTUAL STORAGE VOLUME FOR PURPOSE OF COMPARING WITH PERMITTED VOLUMES
- 3) ROMAN NUMERAL REFERS TO CONTAINMENT CALCULATION AREAS

Figure II.B.1-1
Container Storage Locations
Safety-Kleen Corp. Facility
Tampa, Florida



0 30
APPROXIMATE SCALE
FEET

LEGEND



DUMPSTER



GRATED AREA



HAZARDOUS WASTE
CONTAINER STORAGE AREA



ROLL-UP DOOR



TRENCH

NOTE:

- 1) TRANSFER WASTE HOLDING AREAS MAY EXPAND DEPENDING ON THE AMOUNT OF TRANSFER WASTES ARRIVING AT THE FACILITY
- 2) TRANSFER WASTE VOLUMES ARE INCLUDED IN CALCULATING TOTAL ACTUAL STORAGE VOLUME FOR PURPOSE OF COMPARING WITH PERMITTED VOLUMES

Rev.	Date	Description	Drawn	Checked
1				
2				
3				

CLERICAL

FILES
DRIVER'S DESK

WAREHOUSE FLOORS SPACE USED FOR LOCKER AREA

HVAC

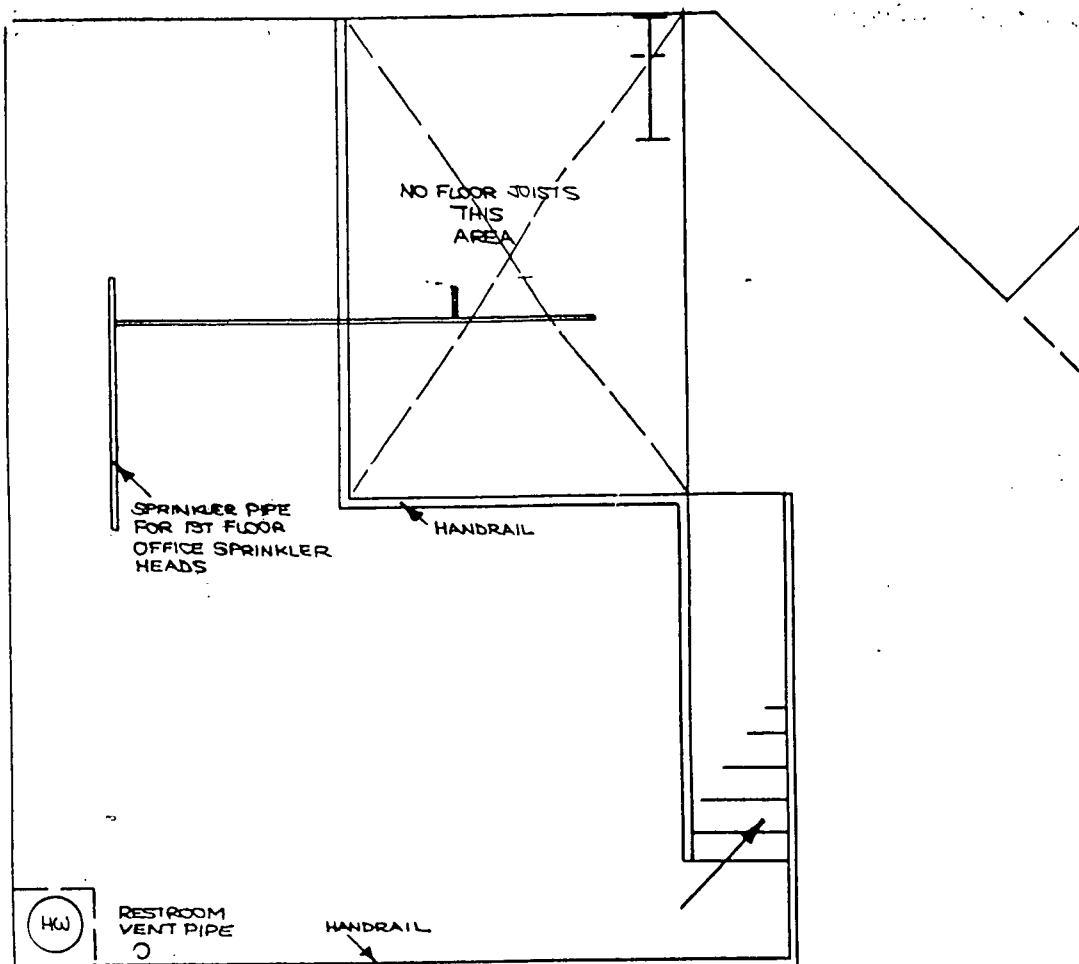
A/C MGR'S OFFICE
ASST. MGR'S OFFICE

MEN'S REST ROOM
WOMEN'S RESTROOM
MEN'S SHOWER
WOMEN'S SHOWER

Product Development

Tolerances unless specified are: Two places (xx) ±.020 Three places (xxx) ±.008 Angles (x°) ± 1/2°	Material:	Drawn: 2/93	Title: TAMPA A/C OFFICES AS IS - GROUND FLOOR
		Checked: G.R. TRACY	Scale: 1"=4'-0"
		Approved:	Do not scale print
		Approved:	Sheet 1 of 1

Safety-Kleen Corporation, 777 Big Timber Road, Elgin, Illinois 60120

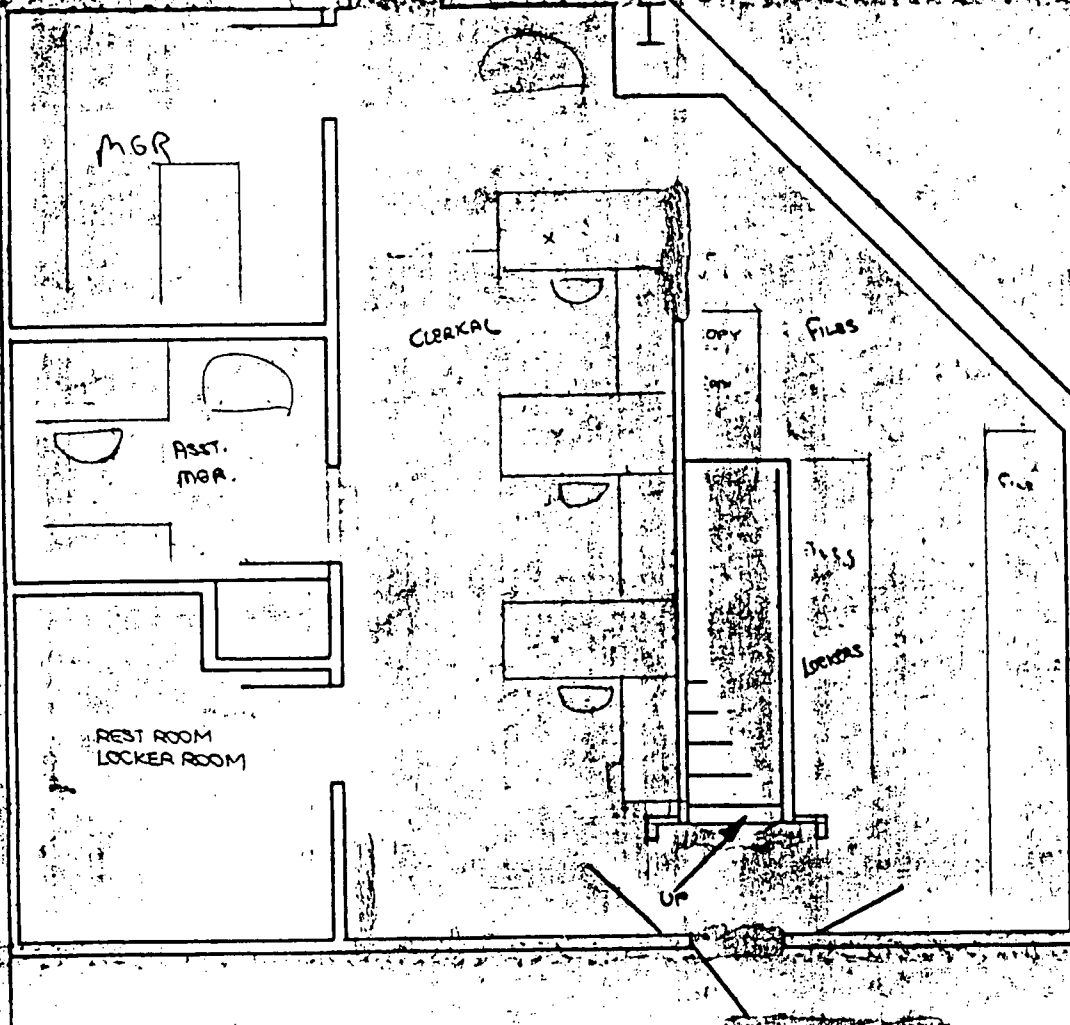


Date	Symbol	Description	Drawn	Checked

Product Development

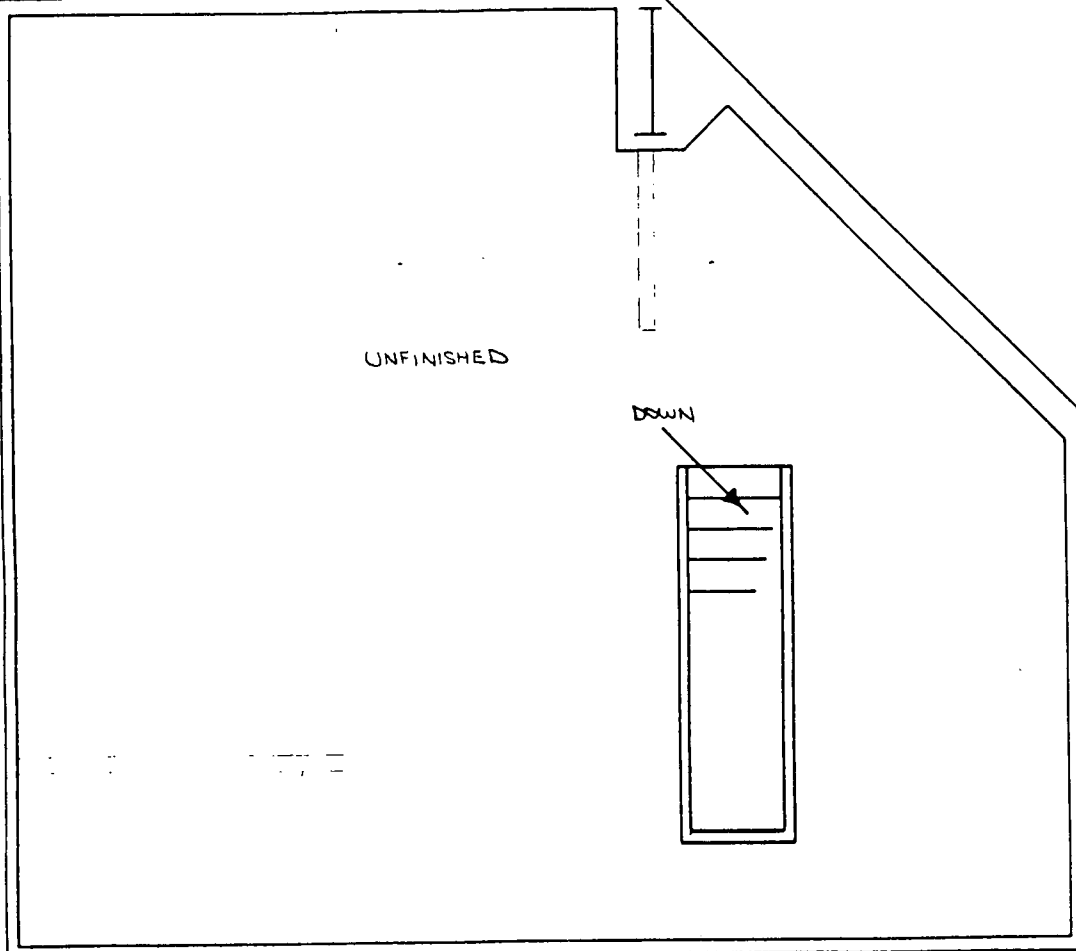
Tolerances unless specified are: Two places (xx) ±.020 Three places (xxx) ±.005 Angles (°) ±1/2°	Material:	Drawn: 2/93	Title: TAMPA A/C MEZZANINE AS IS
		Checked: G.R. TRACY	
		Approved:	
		Approved:	
This drawing contains information proprietary to Safety-Kleen Corporation. Any disclosure or reproduction in part or in whole is expressly prohibited except by a written agreement from Safety-Kleen.		Scale: 1" = 4'-0" Do not scale print	Sheet 2 of 2

Safety-Kleen Corporation, 777 Big Timber Road, Elgin, Illinois 60120



Tolerances unless specified are: Two places (xx) ± .020 Three places (xxx) ± .008 Angles (x°) ± 1/2°	Material	Drawn: 2/25/93	Title: TAMPA A/C OFFICE UPGRADE - 1ST FLOOR	
		Checked: G.R. TRACY		
		Approved:	Scale: 1" = 4'-0"	- - - 2
		Approved:	Do not scale print	
This drawing contains information proprietary to Safety-Kleen Corporation. Any disclosure or reproduction in part or in whole is expressly prohibited except by a written agreement from Safety-Kleen.		Sheet 3 of	Revision: 1- 8/21/93: RELOCATED BOX W/ASE, ADDED 2 DOORS.	

Safety-Kleen Corporation, 777 Big Timber Road, Elgin, Illinois 60120



2 hour fire wall - floor to ceiling

Tolerances unless specified are: Two places (xx) ± 0.020 Three places (xxx) ± 0.005 Angles (x°) $\pm 1/2^\circ$	Material:	Drawn: 2/25/93	Title: TAMPA A/C OFFICE UPGRADE - MEZZANINE	
		Checked: G.R. TRACY	Scale: 1" = 4'-0"	- - - 2
		Approved:	Do not scale print	
		Approved:		
This drawing contains information proprietary to Safety-Kleen Corporation. Any disclosure or reproduction in part or in whole is expressly prohibited except by a written agreement from Safety-Kleen.			Sheet 4 of	Revision:

Safety-Kleen Corporation, 777 Big Timber Road, Elgin, Illinois 6012

PERMIT COVER MEMO

TO: RICK GARRITY, DIRECTOR OF DISTRICT MANAGEMENT

FROM/THROUGH:

William Kutash, PROGRAM ADMINISTRATOR

Gary Santti, PROFESSIONAL ENGINEER II

Lynne R. Milanian, DISTRICT PERMITTING ENGINEER *7/13*

DATE: July 13, 1993

FILE NAME: Safety Kleen Corporation

PERMIT #: HO29-158820

PROGRAM : Hazardous Waste

COUNTY Hillsborough

TYPE OF PERMIT ACTION: X PERMIT MODIFICATION MINOR

PUBLIC NOTICE PERIOD CLOSED? N/A

PERMIT SUMMARY: The Tampa Service Center is currently authorized to store hazardous wastes in containers and tanks. The center acts as a storage location for the various waste types until enough material has been gathered from customers to warrant a shipment to the Corporate treatment recycling facility. Safety Kleen has proposed storage of non-RCRA waste Actrel® Parts Washer (which is a degreasing solvent similar to mineral spirits) in the RCRA storage tank currently containing the spent mineral spirits. Effectively Safety-Kleen will be mixing a non-RCRA waste with a RCRA waste and the resulting combination will be a RCRA waste.

PROFESSIONAL RECOMMENDATION: X APPROVE DENY

EVALUATION SUMMARY: As the mineral spirits and the Actrel® Parts Washer are compatible this mixing of the two will not effect the current waste stream. Actually the Actrel® Parts Washer is almost identical to the mineral spirit waste except that it has a flash point of greater than 140 degrees F which is the criteria for establishing a characteristically hazardous waste due to ignitability. Treatment of the Actrel® Parts Washer will be identical to mineral spirit treatment which involves distillation at Safety-Kleen's parent corporation.

RCRA permit modifications are not subject to any time clocks.

skcovm2.doc

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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 *lyrne 4/30*

DATE: April 30, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Info on Fire Suppression System and Treatment of Rainwater

----- *6-j*
Attached, please find correspondence dated April 28, 1993 and submitted April 29, 1993 which is subject to the referenced permit. The package includes the following items:

1. One two page cover letter.
2. One quarter inch package detailing the fire suppression system and the manner inwhich stormwaster will be handled, pages 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

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

THRU: 31 Gary Santti, Professional Engineer II, Tampa
Hazardous Waste Regulation

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *lynne 4/30*

DATE: April 30, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
New Product Cartridge Filters Modification

Attached, please find correspondence dated April 23, 1993 and submitted April 26, 1993 which is subject to the referenced permit. The package includes the following items:

1. One single page cover letter.
2. Narrative to be placed in the active application detailing the new proposed product cartridge.

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



April 28, 1993

Ms. Lynn Milanian
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm
Tampa, FL 33619

RE: Safety-Kleen Corp., Tampa, Florida; FLD980847271

Dear Lynn:

As discussed at our meeting on April 26, 1993, Safety-Kleen Corp. (Safety-Kleen) is providing an informational modification to the operating permit application for the above-referenced facility. The modification includes information concerning two activities which are being performed at the Tampa facility.

Activity one is the installation of the fire suppression system in accordance with Florida Department of Environmental Regulation's (FDER's) letter dated August 28, 1991. As part of the fire suppression system, a mechanism for containing fire water from the flammable storage area has been designed and installed. This mechanism consists of a 10" pipe connected to the existing containment trench in the flammable storage area. This pipe discharges into the unused tank containment area located outside the southwest corner of the warehouse. It is Safety-Kleen's intention to account for this containment area as part of its containment capacity for the flammable storage room. This allows Safety-Kleen to far exceed the 10% containment capacity required for the container storage area.

Activity two is the installation of a treatment system for rain water which accumulates in the tank containment area(s). This treatment system is designed to address the agency's concerns identified in Florida Department of Environmental Regulation's (FDER's) Interoffice Memorandum dated January 25, 1993. This system will not be installed until approval is received from FDER's industrial waste water staff. The preliminary indication from Mr. Vanderslice is that FDER will probably exempt the system from permitting.

13112.19/01/LM042893.LTR/3

Ms. Lynn Milanian
April 28, 1993
Page -2-

Enclosed are four copies of the revised text and figures. The attached table provides instructions for updating the permit application. Photographs of the trench installation are provided for your information.

As discussed at our April 26, 1993 meeting, no modification fees are required for these modifications since they are continuation items from previous modifications.

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

Sincerely,

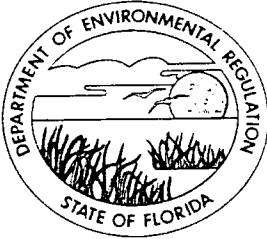


Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

chn/ksc

Enclosure(s)

c: C. Norton - ERM



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

April 15, 1993

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

D.E.R.

APR 27 1993

Dear Victor:

SOUTHWEST DISTRICT
TAMPA

The Department has reviewed the information on Safety Kleen's premium solvent submitted on March 30, and discussed during our meeting on April 12.

The Material Safety Data Sheet (MSDS) indicates that the flash point of unused premium solvent exceeds 140 F. However, we noted that the Tag Closed Cup Tester was used to determine the flash point. Title 40 Part 261 of the Code of Federal Regulations (CFR), in defining ignitability, requires the use of a Pensky-Martens Closed Cup Tester or a Setaflash Closed Cup Tester, using the test methods specified in 40 CFR 261.21(a)(1). Other test methods may only be used if approved by the U.S. Environmental Protection Agency using the procedures outlined in 40 CFR 260.20 and 260.21. There is not enough information to determine if the unused premium solvent is ignitable if tested pursuant to 40 CFR 261.21(a)(1). Also, from the lab analysis results provided by Safety Kleen, we cannot determine if the samples of used solvent were tested for ignitability using the approved methods.

We are advising all producers and marketers of high flash solvents that the addition of materials that contain heavy metals and/or organic constituents may make waste solvent a hazardous waste. It is the generator's responsibility to determine whether their spent solvents are hazardous waste through process knowledge or testing. We applaud Safety Kleen's commitment to customer training. However, these efforts do not absolve the generator of their responsibility for properly characterizing their wastes.

If you have further questions, please call Mike Redig or me at 904/488-0300.

Sincerely,

Satish Kastury, Administrator
Hazardous Waste Regulation

SK/11.

cc: Waste Program Administrators
Diana Davis, FDER/OGC
Alan Farmer, US EPA/Region IV



D.E.R.

APR 26 1993

SOUTHWEST DISTRICT
TAMPA

H029-158820
H029-230256

April 23, 1993

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

RE: Minor Modification to the Operating Permit Application, Safety-Kleen Corp., Tampa, Florida; FLD 980847271

Dear Ms. Millanian:

Safety-Kleen Corp. is submitting a minor modification to the operating permit application for the above-referenced facility. This modification includes information about a new product (cartridge filters) which Safety-Kleen will be supplying and recycling from its customers. This new product will be managed as a transfer waste under the Fluid Recovery Service (FRS) program. Attachment I.D.2 has been revised to include this new product.

Enclosed is the \$250 minor modification fee.

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

Sincerely,

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

chn/mmm

Enclosure(s)

c: C. Norton - ERM
S. Kastury - FDER, Tallahassee

13112.00/01/FILTER.LTR/2

FDER				1311334.19	#554	250.00
MINOR MOD FEE						
TOTAL						250.00



ERM

ERM-South, Inc.

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

FIRST UNION NATIONAL BANK of FLORIDA
JACKSONVILLE, FL 32231

63-1012
632

018559

CHECK DATE	REFERENCE
4-23-93	18559

AMOUNT
250.00

PAY: TWO HUNDRED FIFTY DOLLARS & NO/100

TO: FDER

ERM-South, Inc.

⑈018559⑈ ⑆063210125⑆ 11060000165⑈

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

Date: 20-Apr-1993 01:57pm EST
From: Michael Hatcher TAL
HATCHER_M AT A1 AT DER
Dept: Division Water Facilities
Tel No: (904)488-8163
SUNCOM:

TO: See Below

Subject: Saftey-Kleen Permit Mod. - "Premium Solvent"

Here is the standard language to be used in your approval letter to Saftey-Kleen regarding the subject permit modification:

"The Department approves your request to accept waste premium solvent at the facility service center. The waste premium solvent will be mixed in the bulk used parts washer tank when it arrives at the service center. At this time the Department has not determined the regulatory status of the waste premium solvent. Until the Department makes such a determination Saftey-Kleen is to transport and handle the waste premium solvent in the same manner as other hazardous waste."

Distribution:

TO: Bill Kellenberger	PEN	(KELLENBERG_B AT A1 AT DER)
TO: Ashwin Patel	JAX	(PATEL_A AT A1 AT DER)
TO: Lucy Albrecht	ORL	(ALBRECHT_L AT A1 AT DER)
TO: Gary Santti	TPA	(SANTTI_G @ A1 @ TPA)
TO: Ghousuddin Minhaj	FTM	(MINHAJ_G AT A1 AT DER)
TO: Knox McKee	WPB	(MCKEE_K AT A1 AT DER)
CC: Satish Kastury	TAL	(KASTURY_S AT A1 AT DER)

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 4/16*

DATE: April 16, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Container Arrangement Diagrams

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

1. One single page cover letter.
2. Two revised Figures (II.B.1-2 and II.B.1-3) 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



April 14, 1993

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

RECEIVED
APR 15 1993

Department of Environmental Regulation
SOUTH WEST DISTRICT
BY _____

RE: Safety-Kleen Corp., Tampa, Florida Facility; FLD980847271; Operating Permit
Application

Diagrams PLACED in active application

Dear Lynn:

Enclosed are four P.E. sealed copies of Figures II.B.1-2 and II.B.1-3 which have been revised to show the rows where containers will be stored per your verbal request and our subsequent conversation of April 13, 1993.

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

Sincerely,

Victor L. San Agustin

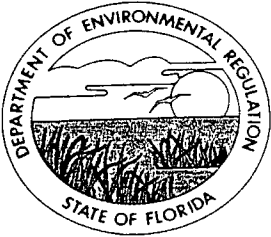
Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

pjh/mm

Enclosure(s)

c: C. Norton - ERM

13113.19/01/LM041493.LTR/2



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

April 12, 1993

D. E. R.

Mr. Alan Farmer, Chief
U S Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30808

APR 15 1993

SOUTHWEST DISTRICT
TAMPA

RE: Safety Kleen Premium Solvent Proposal


Dear Mr. Farmer:

We recently received a request (copy enclosed) from Safety Kleen for the Department's review of their Proposed substitution of their low flash Mineral Spirits based solvents with a new blend that flashes at 148 degrees F (Tag Closed Cup). While we are reviewing this Proposal, we are interested to know if such a request has been reviewed or approved by your Department.

We would appreciate if you could provide us with any information on the subject proposal. Should you have any questions, please call Michael Redig of my staff at 904/488-0300.

Thank you for your assistance.

Sincerely,


Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/mro

enclosure

cc: Diane Davis, OGC
Bill Congdon, OGC
Mike Redig
District WPA's

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

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

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 4/2*

DATE: April 2, 1993

SUBJECT: *Safety-Kleen Corporation, FLD 980 847 271*
Operating Permit File No. HO29-158820
Major Modification - Tampa Service Center
Revised Waste Table

Attached, please find correspondence dated March 30, and submitted March 30, 1993 which is subject to the referenced permit. The package includes the following items:

1. One single page cover letter.
2. One revised Table I.D.3-1 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



D. E. R.

MAR 30 1993

SOUTHWEST DISTRICT
TAMPA

March 30, 1993

Ms. Lynn Milanian
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 Ms. Milanian:

Safety-Kleen Corp. is submitting four copies of a corrected Table I.D.3-1 for the above-referenced facility.

We appreciate your bringing this error to our attention.

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

Sincerely,

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

pjh

Enclosure(s)

c: Cynthia Norton - ERM

1311326.19/01/LM033093.LTR



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:

HC29-158820 6-J

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.

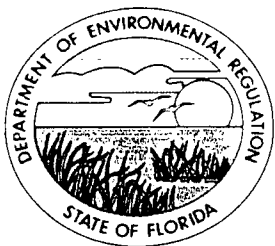
If you have any questions, please call me at (813)682-8094.

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.



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

D.E.R.

January 26, 1993

JAN 28 1993

SOUTHWEST DISTRICT TAMPA

CERTIFIED

P-810 426 775

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

OCD-SW-93-0050

Seminole County - Storage Tanks
Hazardous Waste

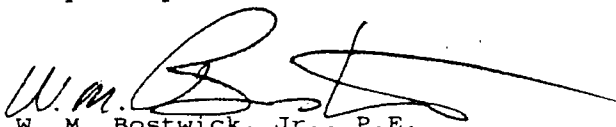
Dear Mr. San Agustin:

I am indeed sorry that you have not received a reply to your October 30, 1992 letter from Marshall Mott-Smith. We advised Mr. Mott-Smith as to the appropriate response to your letter at that time. Since he did not forward that information, here are the facts.

- 1) Product storage tanks are not regulated by RCRA under Subtitle C rules or by permit.
- 2) The fact that these storage tanks are located at a facility which has a RCRA permit does not exempt them from other rules.

We trust that this will clarify this matter for you.

Very Truly Yours,


W. M. Bostwick, Jr., P.E.
Program Administrator
Waste Management

WMB/ew

cc: Marshall Mott-Smith
Waste Program Administrator's
Satish Kastury

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

TO: Satish Kastury
Administrator, Tallahassee

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

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 1/26*

DATE: January 25, 1993

SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Operating Permit File No. HO29-158820
Tampa Service Center
Update to Emergency Contact List *and* Subpart BB

Attached, please find correspondence dated January 8, and January 12, 1993 and submitted January 11, and January 13, 1993 which is subject to the referenced permit. The package includes the following items:

1. One single page cover letter indicating changes to the emergency contact list and six revised application pages.
2. One single page cover letter concerning subpart BB requirements and one diagram detailing piping and valving.

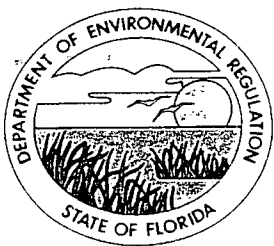
Should you have any comments, please provide your written response within thirty days.

Attachments

cc Alan Farmer, Chief RCRA Branch, EPA Region IV

lrm

sktran.doc



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

JAN 21, 1993

DATE

FAXED
1/21/93
1:40 pm

TO: Bill Crawford

TOTAL PAGES: 3

DEPT: SAFETY-KLEEN

PHONE: _____

FAX NUMBER: _____

FROM: L. Milanian

DEPT: RCRA

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

REFERENCE: as requested copy of receipts

MESSAGE: _____

REPLY: _____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NO 130585

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Safety-Kleen Corp. Date 12/27/88
Address 777 Big Timber Rd Elgin, ALA Dollars \$ 2000.00
60123
Applicant Name & Address same
Source of Revenue same
Revenue Code 1044 Application Number H029-158820
By Donna Jordan
ck 932791

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

197726

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Frank Taylor Date 6-30-92
Address 128 St Johns Place Land O Lakes Dollars \$ 250.00
Applicant Name & Address _____
Source of Revenue _____
Revenue Code 10 Application Number H029-215558
By Alvino King
ck 1756

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

184068

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Safety Kleen Date 1/9/92
Address 777 Big Timber Rd. Elgin AL Dollars \$ 500.00
Applicant Name & Address same
Source of Revenue Tank + Container Storage
Revenue Code 1044 Application Number H029-206965
By Alvino King
ck 340683
FF Myers 148-6975
278-0870
Let Suzanne from Tallahassee
write could do better

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Safety - Kleen Date 3/23/92
Address 777 Big Timber Rd. Elgin, IL 60123 Dollars \$ 15,000.00
Applicant Name & Address Same
Source of Revenue Same
Revenue Code 1042 Application Number HC29-210802

CK 247376

By Alvina King

STREET: 5309 24TH AVE. S. CITY: TAMPA
STATE: FL ZIP: 33619 PHONE: -----
APPLICATION NAME: SAFETY-KLEEN CORP.
STREET: 777 BIG TIMBER RD. CITY: ELGIN
STATE: IL ZIP: 60123 PHONE: 708-697-8460

AGENT NAME: -----
STREET: ----- CITY: -----
STATE: ----- ZIP: ----- PHONE: -----

FEE #1 DATE PAID: 03/23/92 AMOUNT PAID: 15000 RECEIPT NUMBER: 00188456

DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - / /
DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - / /
DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. - - - / /
DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - / /
DATE LAST 45 DAY LETTER WAS SENT - - - / /
DATE FIELD REPORT WAS REQ--REC - - - / /
DATE DNR REVIEW WAS COMPLETED - - - / /

DATE APPLICATION WAS COMPLETE - - - / /
DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - - / /
DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - / /
DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - / /
DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - / /
WAIVER DATE BEGIN--END (DAY 90) - - - / /

COMMENTS:



RECEIVED
DEC 22 1992

December 21, 1992

Department of Environmental Regulation
SOUTH WEST DISTRICT
BY _____

Ms. Lynne R. Milanian
District Permitting Engineer
Hazardous Waste Section
Florida Department of
Environmental Regulation
Southwest District
3804 Coconut Palm
Tampa, FL 33619

RE: Safety-Kleen Corp.; FLD 980 847 271, Operating Permit HO29-158820

Dear Ms. Milanian:

Placed in Active Application

In accordance with your request of December 16, 1992, Safety-Kleen (SK) is providing one complete copy of the latest training program (Attachment II.A.4(e)). If we can be of further assistance, please contact me at (813) 682-8094.

Sincerely,

Victor L. San Agustin

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

CHN/pjh

Enclosure(s)

c: C. Norton - ERM

13113.19/01/LM122192.LTR

State of Florida
Department of Environmental Regulation

District Routing Slip

To:

Gary Santti

Date:

11-25-92

C.C. To:

	Pensacola	Northwest District	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	Northwest District Satellite Office	
✓	Tampa	Southwest District	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	Orlando	Central District	
	Melbourne	Central District Satellite Office	
	Jacksonville	Northeast District	
	Gainesville	Northeast District Branch Office	
	Fort Myers	South District	
	Marathon	South District Branch Office	
	West Palm Beach	Southeast District	
	Port St. Lucie	Southeast District Branch Office	
Reply Optional <input type="checkbox"/>		Reply Required <input type="checkbox"/>	Info Only <input type="checkbox"/>
Date Due _____		Date Due _____	

Comments:

Beth *re transfer facilities*
GP *D.E.R.*
Jeff
Janet
Eric
Kevin

NOV 30 1992
SOUTHWEST DISTRICT
TAMPA

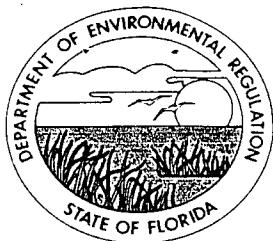
* Please return to Lynne for filing.

From:

Diana Davis

Tel:

278-9730



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

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

November 24, 1992

Dear Mr. San Agustin:

As a follow up to our October 14 response to your July 29th comments, this letter will further address your concerns as to item 3 of your original correspondence.

You requested that the term "operating records" be used instead of "written record" in rule 17-730.171(2)(e), which describes the permanent record that transfer facilities must maintain of all hazardous waste entering and leaving the facility. According to your letter, Safety-Kleen facilities currently maintain an operating log which includes the date the waste enters and leaves the facility, the name of the customer and the manifest number. However, the customer EPA ID number is not recorded in the operating log. The EPA ID number and manifest number is found on the customer invoices that are part of each facility's operating record. Therefore, in order to find the EPA ID number or the address of the generator, an inspector must consult the customer files at the facility.

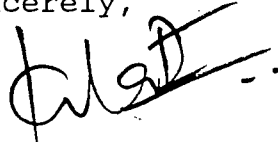
The rule is explicit that the "written record" must include the generator's EPA ID number or the generator's name and address if the generator is conditionally exempt. Rule 17-730.171(2)(e), F.A.C. The purpose of this requirement is to facilitate inspections of transfer facilities. The inspectors must be able to look in one location for this information. The rule was specifically designed to put the burden on the regulated facility to gather this information in a single location.

The term "written record" does not refer to all "operating records." Your written comments of July 29th were received too late to be considered in the rulemaking procedures occurring at that time. A rule revision to substitute "operating record" for the word "written record" is not being considered by the Department.

Safety-Kleen must comply with the record keeping requirements of rule 17-730.171(2)(e), F.A.C. No imminent enforcement action exists to address the compliance or noncompliance of Safety-Kleen's record keeping practices. Michael Redig indicated that Safety-Kleen is in the process of developing a database to include the information required by rule 17-730.171(2)(e), F.A.C. In consideration of your diligence to determine proper record keeping procedures, Safety-Kleen will be given until January 1993, to come into compliance with 17-730.171(2)(e), F.A.C. requirements.

If you have any questions, please call Diana Davis at 904/488-9730.

Sincerely,



Satish Kastury, Administrator
Hazardous Waste Regulation

SK/dld

cc: Bill Kellenberger, DER/ Pensacola
Ashwin Patel, DER/ Jacksonville
Gary Santti, DER/ Tampa
Bob Snyder, DER/ Orlando
Ghaus Minhaj, 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

Box
FYI
Return
BW



D.E.R.

MAR 2 1992

SOUTHWEST DISTRICT
TAMPA

February 25, 1992

Sent Via Federal Express
Mail - February 25, 1992

H029-158810

AI, 6-j

Mr. Robert Snyder, P.E.
Hazardous Waste Section
Florida Department of Environmental
Regulation - Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

Subject: RCRA Inspections Dated May 17 and Oct. 30, 1991
Response to Recommended Corrective Action 10.a.
Safety-Kleen Corp. - Altamonte Springs Branch
EPA ID No. FLD 097 837 983

Dear Mr. Snyder:

The purpose of this letter is to respond to one of the recommended corrective actions specified in John White's inspection report dated November 14, 1991.

Section 10.a. of the report recommends that Safety-Kleen must "provide a written plan designed to identify other facilities where this violation has occurred and correct the violation." The alleged violation referenced is that Safety-Kleen transported hazardous waste without a manifest from 2 customers who are large quantity generators. Safety-Kleen already explained in our response dated January 13, 1992 as to why the alleged violation occurred and that the matter has been resolved. This response is to provide to you the written plan requested.

In our response dated January 13, 1992, we mentioned that development of the plan requires a possible coordination between FDER's/USEPA Region IV's and Safety-Kleen's database of EPA ID numbers. Such a coordination was attempted between the State of Minnesota's and Safety-Kleen's databases.

The merging between the two systems was not successful. The computer comparison can only be done either by company name or by address. Cross checking between company names and addresses was not successful because the name or address in Safety-Kleen's system differed from the name or address of the State of Minnesota's system, for the same customer. Many

9892

such discrepancies were noted and were found to be unmanageable at the computer level.

Given our experience in Minnesota, Safety-Kleen has decided to first deal with this issue manually. Beginning September, 1991, Safety-Kleen began using EPA Region IV's list of EPA ID numbers for all of Florida's Large Quantity Generators and Small Quantity Generators between 100 to 1000 kg/month. We have since decided to obtain such printouts from FDER's Bureau of Information systems every calendar quarter beginning 1992's second quarter. We decided to use Florida's system rather than EPA Region IV's because according to a discussion with Mr. Michael Redig of BWPR-FDER on February 24, it was indicated that the information in the state's system would be more current. We feel that a quarterly update is appropriate at this time realizing that the state's system will change periodically.

Each Safety-Kleen Corp. branch in Florida should have the FDER printouts in March. Before a pick-up of hazardous waste is made from a customer, the branch compares the generator status on the customer invoice with the status on the EPA listing. Corrections are made when an inconsistency in generator status is found. Since we do pick-up wastes from all our customers every 4 weeks or even up to every 16 weeks, each branch will eventually cross check all of its customers by the end of a 16 week cycle. Cross checking between customer invoices and the FDER listing will commence in 1992's second calendar quarter.

As far as accepting hazardous waste from government-owned, contractor operated facilities, each branch is now aware that any waste pick-up within a government owned base or facility even if there are contractors within it must comply with all applicable manifesting requirements. There are only a very small number of such facilities within a branch's sales region therefore, each branch has been made aware to use the generator status and the EPA ID number of the entire base or facility.

We hope that this plan is satisfactory. If you have any questions or concerns, please call me at (813) 682-1176.

Sincerely,

Victor L. San Agustin

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



February 25, 1992

Also Sent Via Facsimile
February 25, 1992

Ms. Margaret Mitchell
Bureau of Information Systems
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Quarterly Hazardous Waste Printouts
for All Generators in Florida

Dear Ms. Mitchell:

This letter is to request a printout of all hazardous waste Treatment, Storage, and Disposal (TSD) facilities, Large Quantity Generators (LQG), and Small Quantity Generators (SQG) in Florida.

We request a printout of such facilities for each of the 67 counties in Florida. For each county printout, we would like to have an alphabetical listing of TSD's, LQG's, and SQG's. They can be mixed together.

As requested in your message recorder, my address and phone number are as follows:

Victor L. San Agustin, P.E.
Safety-Kleen Corporation
129 South Kentucky Ave.
Suite 701
Lakeland, FL 33801
tel. (813) 682-8094

Please call me for the amount that we would owe the Department, or if you have any questions.

Sincerely,

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

cc: Allan Farmer, USEPA IV
Satish Kastury, BWPR-FDER
Michael Redig, BWPR-FDER
Bill Kellenberger, NW-FDER
Ashwin Patel, NE-FDER
Bill Kutash, SW-FDER ✓
Bill Bostwick, CF-FDER
Phil Barbaccia, SF-FDER
Bob Kukleski, SE-FDER



H029-158820

AI. 6-j°

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 1992

D. E. R.

FEB 13 1992

SOUTHWEST DISTRICT
TAMPA

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

RE: Safety-Kleen Corp., Tampa, Florida; FLD 980847271; Specific Condition 30

Dear Mr. Crawford:

Per your discussion with Cynthia Norton of Environmental Resources Management-South, Inc. (ERM) on Monday, February 10, 1992, Safety-Kleen Corp. is requesting an extension to March 31 for the submittal of the waste minimization plan required under Specific Condition 30.

Based upon your conversation with Ms. Norton, Safety-Kleen is under the understanding that this extension is acceptable to the agency. If this is not the case, or you have additional questions, please contact me at (813) 682-8094.

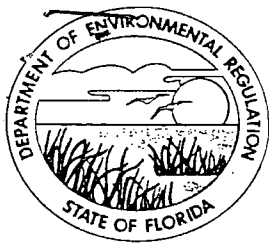
Sincerely,

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

c: Cynthia Norton - ERM

13112.19/TSK18/BC021192.LTR/1

9792



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 25, 1991

Ms. Ellen J. Jurczak
Environmental Permits Manager
Safety Kleen
777 Big Timber Road
Elgin, Illinois 60123

H029-158820

AI, 6-7

RE: Transfer Facility Status Request
Boynton Beach Facility (FLD 984 167 791)

Dear Ms. Jurczak:

The Department received your May 24 request for Transfer Facility status at the Boynton Beach facility. Your request to operate this facility as a transfer facility (storage of hazardous waste for ten days or less) is denied.

According to Specific Condition 8(c) of the Construction Permit HC 50-151555, "The permittee may not commence storage of hazardous waste at the facility until the Department has issued an Operation Permit to the facility." No wastes may be stored at the facility until the Construction Permit has been modified to allow storage or the Operation Permit has been issued. The Transfer Facility designation will not be granted in lieu of modifying the Construction Permit.

"Transfer facility", as defined in 40 CFR 260.10, and adopted by reference in Florida Administrative Code 17-730, means "any transportation related facility including loading docks, parking areas, storage areas, and other similar areas where shipments of hazardous waste are held during the normal course of transportation". 40 CFR 263.12 allows transporters to store hazardous waste up to ten (10) days. This holding period is provided mainly as a cushion for transporters who may encounter transportation problems due to weather or scheduling. It was never the intent of the regulations to allow transporters to circumvent the requirements imposed on storage facilities during the permitting process.

D.E.R.

DIAN - 3

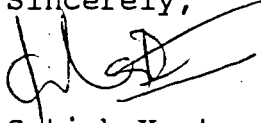
SOUTHWEST
TAMPA

Letter to Safety-Kleen
21 June 1991
Page Two

Once the Construction Permit has been modified to allow the storage of hazardous waste at this facility prior to issuance of the Operation Permit, or the Operation Permit has been issued, the facility may notify as a transfer facility. The area used for the temporary storage of wastes must be separate from the permitted storage areas. Unpermitted wastes cannot be managed in areas designated for the storage of permitted wastes. A closure plan must be submitted to address the transfer facility storage area.

If you have any questions please call Mr. Knox McKee in the Southeast District office (407/433-2650).

Sincerely,



Satish Kastury
Environmental Administrator
Hazardous Waste Regulation Section

SK/mh

cc: Alex Pavda, Southeast District
Deborah Green, Safety-Kleen
Cindy Norton, ERM-South



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 *WMC*

FROM: Lynne R. Milanian *lyne 11/19*

DATE: November 19, 1991

SUBJECT: Safety Kleen Corp., FLD 980 847 271
Draft Permit H029-158820 - Tampa Service Center
Revised Application Pages

Attached please find documents submitted November 13, 1991 by the referenced facility which are supplement to the subject application.

This package includes information detailing:

1. 1 cover letter: Altered Permit Pages;
2. 1 instruction sheet; and
2. 1 copy of revised pages.

LRM/ab
Attachment

cc: James Scarbrough, EPA Region IV

95
91



Via Federal Express

November 12, 1991
91 MH-332

Ms. Lynne R. Milanian
State of Florida
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610

Subject: Altered Permit Pages Transmittal
Tampa, FL Service/Accumulation Center
Federal Operating Permit No. FLD 980 847 271
State Operating Permit No. H029-15882

Dear Ms. Milanian:

This has been prepared to forward additional copies of the revised pages requested on November 8, 1991. Attached you will find three sets of revised pages for insertion in Safety-Kleen's permit application.

If you need additional information or revisions, do not hesitate to telephone. If you have any questions or require further information, I am available on extension 2228.

Sincerely,

Melissa Hlebasko
Environmental Permit Writer

cc: Part B
Chron. File

E. R.

NOV 13 1991
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

FAX TRANSMITTAL SHEET

Nov 8, 1991
Date

TO:

Bob Kukulski

Dept.: KCRA permitting

Phone: FAX 407.433.2666

FROM:

LYNNE MILANIAN

Dept.: D.E.R., Tampa Office

Phone: 813-623-5561 or SunCom 552-7612

EXT. 389

OPERATOR:

SAM

Phone: 813-623-5561 or SunCom 552-7612

EXT.

SUBJECT:

SAFETY-K DRAFT PERMIT H029-158820. COPY of Process description and spec. cond. #14. This permit is currently being revised (AGAIN) to include TCLP waste codes. Once I finish putting the list together, can send you a copy if you are interested.

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 7

RECEIVED BY: _____

Phone: _____



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

PERMITTEE:

Safety Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

Attn: Scott E. Fore
Vice President

PERMIT/CERTIFICATION:

I.D. Number: FLD 980 847 271
Permit No.: HO29-158820
County: Hillsborough
Issue Date: DRAFT #1
Expiration Date:
Latitude / Longitude:
27°55'21"N / 82°23'40"W
Section / Township / Range:
27 / 29S / 19W
Project: Operation of a
Hazardous Waste
Container/Tank
Storage Facility

This permit is issued under the provisions of Chapter 403.722, Florida Statutes, and Florida Administrative Code Rules 17-730. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

The operation of drum and tank storage units within a service accumulation center at 24th Avenue and 54th Street, Tampa, Hillsborough County, Florida.

Tank Storage

Utilization of one aboveground, outdoor, vertical storage tank that has a 15,000 gallon capacity and dimensions of 23 feet 3 inches high by 10 feet 6 inches wide. The unit is constructed of mild steel with a 0.25 inch minimal wall thickness and surrounded by a 46 inch high concrete dike as secondary containment.

Storage of wastes in the tank shall be restricted to spent minerals spirits which are classified as follows:

EPA Number

D001
D006
D008

Waste Type

Ignitability
EP Toxic - cadmium
EP Toxic - lead

Maximum tank operation will be 14,250 gallons which is approximately 95% of the tank's volume. Secondary containment provided by the dike is 20,615 gallons.

PERMITTEE:
Safety Kleen Corporation

PERMIT/CERTIFICATION NO.: HO29-158820
PROJECT: Operation of a Hazardous
Waste Container/Tank Storage
Facility
Solvent Return/Fill Station

Spent mineral spirits shall enter the above referenced storage tank via any one of three dumpsters located in the return and fill station, which is a 50' by 80' roofed structure between the north and south buildings. The dumpsters are not intended for storage and can hold a combined maximum of 1,512 gallons. The interior secondary containment is in the form of a lined concrete vault having four-inch curbs. The interior containment areas slope to (2) 24-inch-deep stainless steel-lined sumps. Additional outer containment is provided and its areas slope to (2) shallow lined concrete sumps. Total containment capacity available during truck loading and unloading procedures is 8,342 gallons. The concrete in this area is coated so as to be impermeable to the solvents handled.

Container Storage

Container storage areas are present in the north and south buildings as detailed:

<u>Features</u>	<u>North Building (Service Center)</u>	<u>South Building (Accumulation Center)</u>
Dimensions	40 ft X 30 ft	60 ft X 45 ft - Area 1 45 ft X 45 ft - Area 2
Curbing	6 in wide X 4 in high	6 in wide X 4 in high
Containment	3 trenches, total capacity 520 gal.	3 trenches, 2 sumps total capacity: 4,437 gal. - Area 1 1,275 gal. - Area 2
Maximum Waste Storage	5,197 gal.	44,367 gal. - Area 1 12,749 gal. - Area 2
Waste Type	non-flammables	Non-flammables - Area 1 Flammables - Area 2

Wastes from five specific sources are authorized for storage as follows:

<u>Source</u>	<u>Hazardous Waste EPA Number</u>	<u>Storage Location</u>	<u>Waste Type</u>
Mineral Spirit Dumpster Mud	D001 D006 D008	South Bldg. Area 2	Ignitable EP Toxic - Cadmium EP Toxic - Lead
Spent Immersion Cleaner	F002 F004	North Bldg. and South Bldg. Area 1 North Bldg. and South Bldg. Area 1	Chlorinated Solvent Cresylic Acid

PERMITTEE:
Safety Kleen Corporation

PERMIT/CERTIFICATION NO.: HO29-158820
PROJECT: Operation of a Hazardous
Waste Container/Tank Storage
Facility

<u>Source</u>	<u>Hazardous Waste EPA Number</u>	<u>Storage Location</u>	<u>Waste Type</u>
Dry Cleaning Waste	D001	South Bldg. Area 2	Ignitable (Mineral Spirits)
	F002	North Bldg. and South Bldg. Area 1	Chloronated Solvent (perchloroethylene & trichlorotrifluoro- ethane)
Paint Waste	D001	South Bldg. Area 2	Ignitable (Lacquer Thinner)
	D006	South Bldg. Area 2	EP Toxic - Cadmium
	D007	South Bldg. Area 2	EP Toxic - Chromium
	D008	South Bldg. Area 2	EP Toxic - Lead
	F003	South Bldg. Area 2	Non-Halogenated Solvents (Lacquer Thinner)
	F005	South Bldg. Area 2	Non-Halogenated Solvents (Lacquer Thinner)
Industrial Solvents (from Large Quantity Generators)	D001	South Bldg. Area 2	Ignitable (Mineral Spirits and Lacquer Thinner)
	D006	South Bldg. Area 2	EP Toxic - Cadmium (Mineral Spirits)
	D008	South Bldg. Area 2	EP Toxic - Lead (Mineral Spirits)
	F001	South Bldg. Area 1	Chloronated Solvents
	F002	South Bldg. Area 1	Chloronated Solvents
	F003	South Bldg. Area 2	Non-Halogenated Solvents (Lacquer Thinner)
	F005	South Bldg. Area 2	Non-Halogenated Solvents (Lacquer Thinner)

Concrete in each of the two storage areas has been coated with material so as to be impermeable to the solvents being stored.

Containerized wastes approved for storage in any of the following combinations: 5 gallon pails, boxes which hold 4 two and one-half gallon filters each, 16-gallon drums, 30-gallon drums, split 30 gallon drums, and/or 55-gallon drums.

PERMITTEE:
Safety Kleen Corporation

PERMIT/CERTIFICATION NO.: HO29-158820
PROJECT: Operation of a Hazardous
Waste Container/Tank Storage
Facility

The following submittals were utilized in the preparation of this document and are considered a part thereof:

- Revised operating permit application submitted May 20, 1991.
- Modifications and additions to the above application received on August 9, 1991 and August 15, 1991.

These documents supercede the original application received on DER Form 17-730.401(2) on December 27, 1988, as well as, past "interim status" authorized by the Department's Tallahassee office.

Replaces Permit No.: HC29-118986

PERMITTEE:
Safety Kleen Corporation

PERMIT/CERTIFICATION NO.: HO29-158820
PROJECT: Operation of a Hazardous
Waste Container/Tank Storage
Facility

SPECIFIC CONDITIONS: (cont'd)

Part II. Container Storage Conditions (cont'd)

6. The permittee shall inspect the container unloading areas as well as the container storage area in accordance with the schedule and procedures approved in Attachment II.B.5 of the application and 40 CFR Part 264.174.

7. Any unknown waste shall be segregated from all other hazardous wastes until it is identified by analyses and a compatibility group is assigned.

8. Incompatible wastes shall not be stored in the same bay or in bays having the same containment system and, shall be physically separated by a dike, berm or other approved device in accordance with 40 CFR Part 264.177(c) requirements.

9. The permittee shall, prior to the storage of hazardous waste, determine the compatibility of each waste to be added to a storage area according to the procedures identified in Section I.D.4 of the permit application and EPA publication 600/2-80-076 "A Method for Determining the Compatibility of Hazardous Waste" (latest edition).

10. Hazardous waste must be compatible with the secondary containment systems and liners of the storage bays.

11. Spilled or leaked waste and accumulated precipitation must be removed from the collection area, analyzed and disposed of in accordance with Attachment II.A.4(b) and Attachment II.A.6 of the application and 40 CFR Part 264.175(b)(5).

12. The permittee shall comply with the 50 foot setback rule concerning the storage of ignitable and reactive wastes in containers as per 40 CFR Part 264.176.

13. The permittee shall comply with the requirements of 40 CFR Part 264.35 and maintain a minimum aisle space between pallets and between a pallet and a wall of two (2) feet for containers storing free liquids. The container arrangement discussed on Page II.B.1-1 of the application shall be followed. Any change to the container arrangement in any unit shall be previously approved by the Department.

14. The permittee shall be authorized to store non-regulated liquids in the regulated storage area provided:

- a. The permittee complies with the requirements of 40 CFR Part 264.175 and includes the volume of non-regulated liquids in calculating the total volume of liquid to be stored in the regulated storage area.
- b. The permittee shall maintain the required aisle spacing in the storage area for both the regulated and non-regulated wastes in accordance with 40 CFR Part 264.35.

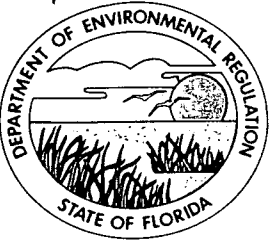
PERMITTEE:
Safety Kleen Corporation

PERMIT/CERTIFICATION NO.: HO29-158820
PROJECT: Operation of a Hazardous
Waste Container/Tank Storage
Facility

SPECIFIC CONDITIONS: (cont'd)

Part II. Container Storage Conditions (cont'd)

- c. The permittee ensures that non-regulated materials shall be separate and apart from regulated waste and shall have signs posted indicating the contents of the containers and that the materials are non-regulated.
 - d. The permittee shall provide a written notice in the facility operating record of any non-regulated materials placed in the regulated storage area. The notice shall detail:
 1. the type and the quantity of the wastes,
 2. verify adequate secondary containment,
 3. confirm that appropriate aisle spacing is available, and
 4. document compatibility of the non-regulated waste with all other wastes already present in the storage area.
15. The container unloading areas shall have the containers removed from the service vehicle to the unloading areas and placed into the respective storage locations within eight (8) hours of arrival at the unloading area. The following container unloading areas (Attachment 2) have been authorized:
- 3 loading docks along the east side of the south building
 - 1 loading dock along the east side of the solvent return fill station
 - 1 loading dock along the west side of the solvent return fill station.
16. All service vehicle trucks and tractor trailers shall be situated over an impervious surface having emergency liquid containment or at one of the unloading areas when the vehicle contains hazardous waste.
17. No vehicle shall be on-site at the facility for more than three (3) days before its contents shall be unloaded into a storage area.
18. The container unloading areas shall be clear of any liquids and/or debris at all times.
19. The following containers shall conform to DOT specifications and be managed in accordance with the approved plan:
- 5 gallon polyethylene drums
 - boxes containing 4 two and one-half gallon filters
 - 16 gallon steel drums
 - 30 gallon steel drums
 - split 30 gallon steel drums
 - 55 gallon steel drums



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

November 5, 1991

Ms. Melissa Hlebasko
Environmental Permit Writer
Safety-Kleen Corporation
777 Big Timber Road
Elgin, ILL 60123

Re: Tampa Service Center, FLD 980 847 271
Draft Operating Permit HO29-158820
Revisions to Draft Permit as Requested by Safety-Kleen

Dear Ms. Hlebasko:

The Department has carefully reviewed your requested modifications to the above referenced draft permit. After much consideration, the following comments have been prepared which reflect the changes the Department has approved in accordance with your concerns. Each item is in the order noted on your letter of October 19, 1991 and is detailed on the enclosed attachment. The Department anticipates issuance of the operating permit within one week of mailing of this notice.

Do not hesitate to contact me should you have any further questions concerning these items.

Sincerely,

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

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee
Rick Peoples, Safety Kleen
Cynthia Norton, ERM
Victor San Agustin, Safety Kleen

ATTACHMENT

- Item 1. TCLP waste codes will be added and EP Toxicity references deleted.
- Item 2. The reference to maximum tank operation will be deleted.
- Item 3. New formulation and old formulation explanation concerning immersion cleaner wastes will be inserted.
- Item 4. 5-gallon containers as well as 85-gallon overpack containers will be noted in the list of containerized wastes.
- Item 5. This concept cannot be approved. However, it is specifically referring to the required reports mentioned in this condition only, other issues may be signed by the appropriate Safety-Kleen employee and would not require the signature of the individual signing the permit application.
- Item 6. Reference to 40 CFR 264.54 will be changed to 40 CFR 270.42.
- Item 7. Clarification on record retention will be made.
- Item 8. This concept is not approved. If non-regulated material is stored in the regulated area and aisle space is not maintained, upon occurrence of a problem, a safe response will be inhibited. However, a statement will be inserted noting that a pallet must be observable from at least 2 sides in which the two foot aisle space is evident. The third and fourth side may be situated against a wall, containment curb or another pallet.
- Item 9. This concept cannot be approved. Any liquid materials placed in the regulated storage area must comply with the safety standards governing this location, which would include calculating a total containment volume based on the amount of non-regulated liquid material in the storage area as well as the amount of regulated liquid waste in the storage area.
- Item 10. This concept cannot be approved. However, if this activity is already a company practice, Safety-Kleen will be viewed as favorably complying with this condition and have no need of concern.
- Item 11. Impervious surface will be changed to manmade surface.
- Item 12. Reference to vehicles containing RCRA wastes will be added.
- Item 13. This concept cannot be approved.

Item 14. This concept cannot be approved. After successful decontamination of the tanks, piping, etc. these items could be sold for scrap but not before with a CFR 261.6 justification.

Miscellaneous Item - On November 5, 1991, Rick Peoples of Safety-Kleen was contacted by Satish Kastury of the Department to discuss the addition of one new specific condition. Mr. Peoples indicated this issue would not be a problem to implement as Safety-Kleen already had devised a plan similar to the Department's request. This condition will appear as number 30. under the "General" Specific Conditions and will read as follows:

30. The permittee shall prepare a waste minimization internal feasibility assessment plan for the generators it services within 90 days of issuance of this permit for Department review.

First Please send 2 more copies of this package!

OK



Via Federal Express

October 28, 1991

91 MH-320

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610

D. E. R.

OCT 30 1991

SOUTHWEST DISTRICT
TAMPA

Subject: Florida DER Draft Hazardous Waste Storage Permit
Tampa, FL Service/Accumulation Center
Federal Operating Permit No. FLD 980 847 271
State Operating Permit No. H029-15882

Dear Mr. Crawford:

This has been prepared as addendum commentary on the subject draft document. The comments forwarded on October 22, 1991. This has been prepared to legibly reiterate the comments submitted earlier. With respect to the sections of the draft document, the following comments are offered:

✓1. Page 1 of 21, Column: Waste Type

Waste Codes D006 and D006 are identified as EP Toxic.

Will utilize MARLINO'S NEW TCLP SPEC. COND.

Safety-Kleen requests that citations of EP toxic be altered to reference the Toxicity Characteristic Leaching Procedure (TCLP), as Florida Department of Environmental Regulation (FDER) has adopted TCLP regulations.

✓2. Page 1 of 21, Paragraph 5

As stated in the draft permit, the maximum tank operation capacity is noted as 14,250 gallons. This amount represents 95 percent capacity of the 15,000 gallon spent mineral spirits tank. The high level alarm becomes activated at this capacity.

Safety-Kleen requests that the maximum permitted storage capacity for this hazardous waste management unit be changed to 15,000 gallons.

Using 15,000 gallons as the maximum storage capacity avoids non-compliance with the permit conditions in the unlikely event tank storage exceeds 14,250 gallons. It should be noted that tank volumes are recorded daily, as required by the facility inspection log for tank systems. This operating record will provide documentation of each time the tank exceeds 95 percent capacity. Special circumstances may require the tank volume at maximum capacity. These circumstances are as follows:

SAME COMMENT SEE PG. III, C. 2-3

Some tank assessment protocol requires the tank at maximum capacity to ensure accurate information.

9/19/91

Calibration of the high level alarm may require the tank volume to temporarily exceed 95 percent capacity.

✓3. Page 2 of 21, Column: Source

The spent Immersion Cleaner formulation listed in the draft permit application is identified by the F002 and F004 waste codes.

As referenced in the permit application, Safety-Kleen is in the process of phasing out this formulation and replacing it with a non-halogenated hydrocarbon mixture.

can do Safety-Kleen requests that the (F002, F004) Spent Immersion Cleaner Formulation be distinguished by adding the following phrase to the Source description: "Old Formulation". Spent Immersion Cleaner "New Formulation" should be added under the column entitled: Source.

Florida has adopted, but is not yet authorized to implement, the Toxicity Characteristic Leaching Procedure (TCLP) regulations. The new immersion cleaner formulation became a newly listed hazardous waste under TCLP regulations. References to both formulations of immersion cleaner are appropriately located throughout the permit application (including the waste analysis plan) reviewed by the DER. In the interim of imminent DER authorization for TCLP, Safety-Kleen requests the addition and distinction of the immersion cleaner formulations to 1) distinguish between the two formulations and 2) insure an easy transition/permit modification when DER becomes authorized to implement TCLP regulations.

✓4. Page 3 of 21, List of Permitted Container Sizes

can do The 5 gallon polyethylene container and the 85 gallon overpack container should be added to the list of combinations of containerized wastes at the facility.

The 85 gallon overpack container is used as a salvage container and may be used to house a container of inadequate integrity. Specifications for both containers were forwarded with the October 18, 1991 Port Charlotte, FL draft permit comment letter.

✓5. Page 9 of 21

Safety-Kleen requests that the following sentence be altered as follows: "...shall be signed by an authorized Safety-Kleen employee...". It should be noted that Safety-Kleen Vice Presidents and the person attesting to the preparation of the permit application preparation sign the certification statements in the permit application. The revised sentence will not restrict information submittals due to the availability of personnel authorized for signature, but it ensures review and sign-off by a Safety-Kleen employee.

THIS IS SPEC COND #16 UNDER "GENERAL" THIS IS A "GENERAL" CONDITION 1.2.1 SET IN STONE!

✓6. Page 11 of 21, General Condition 12

Safety-Kleen requests the following sentence be altered as follows:

can probably do this Amendments, in accordance with 40 CFR 270.42, must be submitted and approved in writing....".

Safety-Kleen requests the insertion of 40 CFR 270.42 to insure the class one permit modification process for applicable contingency plan revisions. For example, the class one permit modification required by a telephone number change of an emergency coordinator may be handled without agency approval.

✓7. Page 12 of 21, General Condition 19

Safety-Kleen requests that the record retention policy (that is, the minimum amount of retention time for a document) be outlined for each listed under records of concern, as required by 40 CFR 264.73 and 264.74.

can add (3 years) next to manifests
As stated in the permit application, all listed records of concern must be maintained until closure of the facility. In accordance with 40 CFR.71, copies of manifests are assigned a minimum retention time of three years. Furthermore, FDER uses 264.73 or 264.74 as authority to require Safety-Kleen to maintain biennial regulations, but further review of the regulations indicate that the records need not be retained until facility closure.

can drop biennial report from list
✓8. Page 15 of 21, Specific Condition 13

The following sentence should be revised as follows: "The permittee shall comply with the requirements of 40 CFR 264.35 and maintain a minimum aisle space of two feet between pallets, and between a pallet and a wall, of two feet for containers storing permitted and hazardous waste free liquids".

No way, any product in reg storage area must comply w/ safety std - can add
Safety-Kleen requests a distinction between permitted and hazardous wastes, *Further pallet definition.*
that's what SPLC cond. 14 is referencing.

✓9. Page 15 of 21, Specific Condition 14 a.

Safety-Kleen requests the deletion of this condition.

No way, see above comment

The permit application, corresponding secondary containment calculation and additional waste management practices referenced throughout the permit application are written for the permitted hazardous waste streams. The Port Charlotte, FL draft permit and the Tampa draft permit are the first permits received by Safety-Kleen that reference this requirement.

Just because others have overlooked this issue doesn't mean SWdist will "CYA"
✓10. Page 15 of 21, Specific Condition 14 b.

Safety-Kleen requests that the sentence be revised as follows "...shall maintain the required aisle spacing in the storage area for the RCRA regulated wastes, in accordance with 40 CFR Part 264.35".

Please refer to comments 10 and 11 for the rationale of the request. Safety-Kleen will ensure, through internal management practices, that the 10% secondary containment practice, aisle space requirements, and waste compatibility practices be met for both RCRA and non-RCRA regulated wastes,

but not as a condition of the permit. *As this is an agreeable management practice noting it in the permit should be no problem... anyway for safety sake anything in the reg area will be managed in accordance w/ reg govern- ing that area.*

- ✓11. Page 16 of 21, Specific Condition 16.

Cando Safety-Kleen requests that the condition be reworded from "impervious" surface to "asphalt or concrete" surface.

Since asphalt and concrete are pervious and actually used for truck loading/unloading areas, the specification of truck parking surface will depict the actual facility conditions.

- ✓12. Page 15 of 21, Specific Condition 17

Cando Safety-Kleen requests the following sentence be altered as follows: "No vehicles containing RCRA regulated containers or RCRA regulated wastes shall be on site..."

The revision distinguishes vehicle loads of RCRA hazardous wastes from product/non-regulated materials.

- ✓13. Page 15 of 21, Specific Condition 21

Judgement call The following sentence should be revised as follows: "The permittee shall maintain, inspect, and operate the tank storage unit, apparent equipment and associated secondary containment structures in such a manner that any leakage or release of hazardous waste from the unit shall be detected with 24 hours of occurrence each operating day that the secondary containment structures be capable of preventing any migration..."

- ✓14. Page 19 of 21, Item 6 - Specific Conditions of Closure

This item mentioned performing closure according to 40 CFR 264.1144 and 264.111, respectively. The remediation department believes that the wording should be added in these items allowing for the handling and scrapping/recycling of metal, rather than disposing as hazardous waste of decontamination of the tanks and other metal equipment at a closed site under the exemption for recyclable materials, 40 CFR 261.6.

this is not recyclable material - 1st have to decon in accordance w/ closure plan in the permit application as you submitted then upon proof of decon is your option to sell as scrap!

Tampa Draft Comments
91 MH-320
Page 5
Page 2 of 20, last sentence, first paragraph

The following phrase should be altered from: "...Safety projects..." to "Safety-Kleen projects". In addition, please alter the following sentence "...within 6 months..." at "...within six months of permit issuance date of the permit...".

This will distinguish a specific date for the required activities.

Thank you for your attention to this matter. If you have any questions or require further information, I am available on extension 2228.

Sincerely,



Melissa Hlebasko
Environmental Permit Writer

cc: V. San Agustin
C. McCord
J. Davis
F. Taylor
F. Stockbarger
C. Norton
Part B
Chron. File



Federal Express

October 28, 1991

91 MH-320

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 28
To	Mr. Bill Crawford	
From	Melissa Hebard	
Co.	Co.	
Dept.	Phone # 708.697.8460	
Fax # 813.272-2279	Fax #	

Subject: Florida DER Draft Hazardous Waste Storage Permit
Tampa, FL Service/Accumulation Center
Federal Operating Permit No. FLD 980 847 271
State Operating Permit No. H029-15882

Dear Mr. Crawford:

This has been prepared as addendum commentary on the subject draft document. The comments forwarded on October 22, 1991. This has been prepared to legibly reiterate the comments submitted earlier. With respect to the sections of the draft document, the following comments are offered:

1. Page 1 of 21, Column: Waste Type

Waste Codes D006 and D006 are identified as EP Toxic.

Safety-Kleen requests that citations of EP toxic be altered to reference the Toxicity Characteristic Leaching Procedure (TCLP), as Florida Department of Environmental Regulation (FDER) has adopted TCLP regulations.

2. Page 1 of 21, Paragraph 5

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Safety-Kleen requests that the maximum permitted storage capacity for this hazardous waste management unit be changed to 15,000 gallons.

Using 15,000 gallons as the maximum storage capacity avoids non-compliance with the permit conditions in the unlikely event tank storage exceeds 14,250 gallons. It should be noted that tank volumes are recorded daily, as required by the facility inspection log for tank systems. This operating record will provide documentation of each time the tank exceeds 95 percent capacity. Special circumstances may require the tank volume at maximum capacity. These circumstances are as follows:

Some tank assessment protocol requires the tank at maximum capacity to ensure accurate information.

77 BIG TIMBER ROAD

ELGIN, ILLINOIS 60123

PHONE 708/697-8460

FAX 708/697-4295

9091

Calibration of the high level alarm may require the tank volume to temporarily exceed 95 percent capacity.

3. Page 2 of 21, Column: Source

The spent Immersion Cleaner formulation listed in the draft permit application is identified by the F002 and F004 waste codes.

As referenced in the permit application, Safety-Kleen is in the process of phasing out this formulation and replacing it with a non-halogenated hydrocarbon mixture.

Safety-Kleen requests that the (F002, F004) Spent Immersion Cleaner Formulation be distinguished by adding the following phrase to the Source description: "Old Formulation". Spent Immersion Cleaner "New Formulation" should be added under the column entitled: Source.

Florida has adopted, but is not yet authorized to implement, the Toxicity Characteristic Leaching Procedure (TCLP) regulations. The new immersion cleaner formulation became a newly listed hazardous waste under TCLP regulations. References to both formulations of immersion cleaner are appropriately located throughout the permit application (including the waste analysis plan) reviewed by the DER. In the interim of imminent DER authorization for TCLP, Safety-Kleen requests the addition and distinction of the immersion cleaner formulations to 1) distinguish between the two formulations and 2) insure an easy transition/permit modification when DER becomes authorized to implement TCLP regulations.

4. Page 3 of 21, List of Permitted Container Sizes

The 5 gallon polyethylene container and the 85 gallon overpack container should be added to the list of combinations of containerized wastes at the facility.

The 85 gallon overpack container is used as a salvage container and may be used to house a container of inadequate integrity. Specifications for both containers were forwarded with the October 18, 1991 Port Charlotte, FL draft permit comment letter.

Must also be in the Tampa app.

5. Page 9 of 21

General

Safety-Kleen requests that the following sentence be altered as follows: "...shall be signed by an authorized Safety-Kleen employee...". It should be noted that Safety-Kleen Vice Presidents and the person attesting to the preparation of the permit application preparation sign the certification statements in the permit application. The revised sentence will not restrict information submittals due to the availability of personnel authorized for signature, but it ensures review and sign-off by a Safety-Kleen employee.

How will the regulating agencies know who is authorized and who is not.

Tampa Draft Comments

91 MH-320

Page 3

6. Page 11 of 21, General Condition 12

Safety-Kleen requests the following sentence be altered as follows:

"Amendments, in accordance with 40 CFR 270.42, must be submitted and approved in writing..."

Safety-Kleen requests the insertion of 40 CFR 270.42 to insure the class one permit modification process for applicable contingency plan revisions. For example, the class one permit modification required by a telephone number change of an emergency coordinator may be handled without agency approval.

7. Page 12 of 21, General Condition 19

Safety-Kleen requests that the record retention policy (that is, the minimum amount of retention time for a document) be outlined for each listed under records of concern, as required by 40 CFR 264.73 and 264.74.

As stated in the permit application, all listed records of concern must be maintained until closure of the facility. In accordance with 40 CFR.71, copies of manifests are assigned a minimum retention time of three years. Furthermore, FDER uses 264.73 or 264.74 as authority to require Safety-Kleen to maintain biennial regulations, but further review of the regulations indicate that the records need not be retained until facility closure.

8. Page 15 of 21, Specific Condition 13

The following sentence should be revised as follows: "The permittee shall comply with the requirements of 40 CFR 264.35 and maintain a minimum aisle space of two feet between pallets, and between a pallet and a wall, of two feet for containers storing permitted and hazardous waste free liquids".

Safety-Kleen requests a distinction between permitted and hazardous wastes, and virgin materials.

9. Page 15 of 21, Specific Condition 14 a.

Safety-Kleen requests the deletion of this condition.

The permit application, corresponding secondary containment calculation and additional waste management practices referenced throughout the permit application are written for the permitted hazardous waste streams. The Port Charlotte, FL draft permit and the Tampa draft permit are the first permits received by Safety-Kleen that reference this requirement.

10. Page 15 of 21, Specific Condition 14 b.

Safety-Kleen requests that the sentence be revised as follows "...shall maintain the required aisle spacing in the storage area for the RCRA regulated wastes, in accordance with 40 CFR Part 264.35".

Please refer to comments 10 and 11 for the rationale of the request. Safety-Kleen will ensure, through internal management practices, that the 10% secondary containment practice, aisle space requirements, and waste compatibility practices be met for both RCRA and non-RCRA regulated wastes, but not as a condition of the permit.

*What is existing words?
Permits this from
beginning now?*

OK

OK

*I think we should keep
the two foot aisle. To
allow access behind
non-regulated material
to verify.*

5/17

11. Page 16 of 21, Specific Condition 16.

OK

Safety-Kleen requests that the condition be reworded from "impervious" surface to "asphalt or concrete" surface.

man made

Since asphalt and concrete are pervious and actually used for truck loading/unloading areas, the specification of truck parking surface will depict the actual facility conditions.

12. Page 15 of 21, Specific Condition 17

Safety-Kleen requests the following sentence be altered as follows: "No vehicles containing RCRA regulated containers or RCRA regulated wastes shall be on site..."

OK

The revision distinguishes vehicle loads of RCRA hazardous wastes from product/non-regulated materials.

13. Page 15 of 21, Specific Condition 21

The following sentence should be revised as follows: "The permittee shall maintain, inspect, and operate the tank storage unit, apparent equipment and associated secondary containment structures in such a manner that any leakage or release of hazardous waste from the unit shall be detected within 24 hours of occurrence each operating day that the secondary containment structures be capable of preventing any migration..."

??

14. Page 19 of 21, Item 6 - Specific Conditions of Closure

This item mentioned performing closure according to 40 CFR 264.1144 and 264.111, respectively. The remediation department believes that the wording should be added in these items allowing for the handling and scrapping/recycling of metal, rather than disposing as hazardous waste of decontamination of the tanks and other metal equipment at a closed site under the exemption for recyclable materials, 40 CFR 261.6.

?

does the permit exclude this?

Tampa Draft Comments

91 MH-320

Page 5

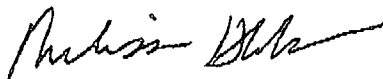
Page 2 of 20, last sentence, first paragraph

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This will distinguish a specific date for the required activities.

Thank you for your attention to this matter. If you have any questions or require further information, I am available on extension 2228.

Sincerely,



Melissa Hlebasko
Environmental Permit Writer

cc: V. San Agustin
C. McCord
J. Davis
F. Taylor
F. Stockbarger
C. Norton
Part B
Chron. File

INSTRUCTIONS FOR UPDATING THE TAMPA
OPERATING PERMIT APPLICATION
REVISION 1: 05/15/91
FLD980847271

Replace the following pages:

<u>Page</u>	<u>Change</u>
I.D.2-2	Change in drum sizes Remove references to color
II.A.4(b)-1	Added last two sentences in paragraph three Change in drum sizes
II.A.4(b)-2	Change in drum sizes Remove references to color
II.A.4(b)-3	Change in drum sizes
II.A.5-7	Remove references to color
II.B.3-1	Added last two sentences in paragraph one Removed references to color Change in drum sizes
II.B.3-2	Change in drum sizes Removed references to color
II.B.4-1	Change in drum sizes Remove references to color
II.B.4-2	Added last 2 sentences to paragraph two
II.B.6-2	Change in drum sizes
II.C.2-1	Change in drum sizes
II.C.2-2	Change in drum sizes

eventually replace the old immersion cleaner. It is essentially a non-chlorinated solvent mixture. The solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrrolidone dipropylene glycol methyl ether, monoethanolamine and oleic acid. It contains a maximum of 1 percent total chlorinated solvents.

The solvents are distributed and collected by their service representatives. Drums are transported in specially-equipped, enclosed route trucks. Clean solvents are distributed from and used solvents returned to the service center where they are stored in separate tanks for the clean and used mineral spirits bulk storage. Warehouse space is dedicated for the storage of both clean and used immersion cleaner drums. Safety-Kleen leases parts washing equipment, including partially filled 5-, 16-, and 30-gallon drums, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons. The mineral spirits are collected in 5-, 16-, and 30-gallon steel drums. The 609 Immersion Cleaner is housed in 16-gallon steel drums. A 16-gallon steel drum is used for 699 Immersion Cleaner. The perchloroethylene from dry cleaning operations is collected in 16-, split 30 (also known as 20-gallon), and 30-gallon poly drums.

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

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

ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
FOR DAILY BUSINESS OPERATIONSGENERAL FACILITY INFORMATIONPurpose

The contingency plan and emergency procedures are designed to ensure that Safety-Kleen is prepared to address emergency situations rapidly and in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

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

General Description of Activities

The business activities conducted at the Tampa Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from, and the used solvents are returned to, the service center, where separate storage tanks are utilized for the storage of clean and used mineral spirits (solvent) and where warehouse space is designated for the storage of drums of both clean and used immersion cleaner, mineral spirits, industrial solvent, antifreeze, paint waste, and dry cleaning wastes (chlorinated solvent). Safety-Kleen uses a drum color scheme as a part of its waste management system. An 85-gallon overpack drum is used for the management of drums whose integrity has been compromised.

The mineral spirits are transported in covered, 5-, 16- and 30-gallon drums between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the drums into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits from the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, drummed, and temporarily stored in the drum storage area for later shipment to the recycle facility for reclamation.

The immersion cleaner remains in 16-gallon covered drums at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in 16-, split 30 (also known as 20-gallon), and 30-gallon drums and stored temporarily at the service center. The drums are picked up periodically for recycling at the recycle facility.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems, and still bottoms. The still bottoms and powder residue are packaged on the customer's premises in 16-, split 30 (also known as 20-gallon), and 30-gallon drums with lock rings.

The antifreeze waste is approximately one-third water and two-thirds antifreeze (ethylene glycol) and contaminants. The waste is collected and stored in 30-gallon steel drums.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in black 5-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in the drum storage area of the warehouse.

The industrial solvents are packaged in polyethene or steel drums which are not opened until they reach the recycle center. Containers are palletized whenever possible (four 55-gallon; five split 30 (also known as 20-gallon) or 30-gallon; nine 16-gallon; or twelve 5-gallon drums or 16 boxes per pallet) to facilitate shipping and storage. Pallets may be stacked up to six feet high while in storage and during transport. This will prevent the containers from contacting any standing liquid while they are in storage.

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. The MSDSs provided in Appendix A represent the biological, physical, and chemical properties of the fresh and used products.

Figures II.A.4(b)-1 and II.A.4(b)-2 show the basic site and floor plans, particularly, the locations of waste management facilities, emergency equipment, and facility storage.

EMERGENCY NOTIFICATION

Emergency Coordinator

The Branch Manager or his designate is the emergency coordinator. Table II.A.4(b)-1 includes the names, home addresses, and both office and home phones of the primary emergency coordinator and his alternates. At least one employee is either present on the facility premises or on call with responsibility for coordinating all emergency response measures at all times. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.

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

PAINT WASTES

Paint wastes consist of various lacquer thinners and paints. The waste is collected in five-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in the drum storage area of the warehouse. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually and the accumulation center will ship 57,000 gallons annually.

INDUSTRIAL SOLVENT WASTES

Seven solvents are collected from industrial solvent users: mineral spirits; 1,1,1-trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro-1,2,2-trifluoroethane; and lacquer thinners. Prior to accepting an industrial solvents customer's waste for recycling, a sample is drawn and analyzed at Safety-Kleen's laboratory in Elgin, Illinois. The criteria used to determine whether a waste is acceptable for recycling are in Table II.A.5-1. The drums are not opened until they reach the recycle center. Samples of the waste collected at the recycle center and the contents of the drum are

ATTACHMENT II.B.1 CONTAINMENT SYSTEM

CONTAINMENT

The drum storage areas shown in Figure II.B.1-1 occupy portions of the building areas which have a concrete floors, concrete berms, and collection trenches to form spill containment systems. The system is free of cracks. Spills are removed by a hand-held, portable electric pump (the COMS pump), wet-dry vacuum cleaner, or sorbent materials. The capacities of the containment system is designed to be greater than 10 percent of the total liquid storage capacity in each drum storage area. Since the characteristics of the stored wastes are known, no analyses are performed for the materials collected from the containment area. All collected materials are sent to a recycle facility for recycling/reclamation. The recovered materials that can not be effectively reclaimed at the recycle facility will be, in turn, sent to a licensed facility for disposal.

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. Containers are palletized whenever possible (four 55-gallon; five split 30 (also known as 20-gallon) or 30-gallon; nine 16-gallon; or twelve 5-gallon, or 16 boxes per pallet) to facilitate shipping and storage. Pallets may be stacked up to six feet high while in storage or during transport. This will prevent the containers from contacting standing liquid while they are in storage. A two foot aisle space will be provided between containment walls and pallets, and between pallets.

The container storage area for the service center (Figure II.B.1-2) has a capacity of 5,197 gallons. The types and numbers of each container may vary. The flammable container storage area for the accumulation center (Figure II.B.1-3) has a capacity of 12,749 gallons. The nonflammable accumulation center container storage area has a

ATTACHMENT II.B.3
WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

The used solvents are not incompatible with each other and with other materials handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. However, they are the primary source of feed stock for regenerating the clean solvents. For ease of inventory control and product integrity, separation and grouping of both used and fresh solvents is a standard practice at the facility. Safety-Kleen uses a drum color scheme as a part of its waste management system. Eight-five gallon overpack drums are used to manage drums whose integrity has been compromised.

All materials are managed in accordance with the local fire protection code and fire department recommendations. A separate flammable storage room has been constructed and is located at least 50 feet from the property line. This room is equipped with explosion blow-out panels.

The immersion cleaner is always contained in partially filled, 16-gallon, covered drums before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The drums containing the used immersion cleaner are returned to the facility and stored in the designated drum storage areas before shipment to the recycle center.

The dry cleaning wastes are contained in 16-, split 30 (also known as 20-gallon), and 30-gallon drums and nylon-lined cardboard boxes. These containers are managed similar to the used immersion cleaner drums and contents within the drums will not be removed or processed at the facility.

The mineral spirits are collected in 5-, 16-, and 30-gallon steel drums. These drums are then emptied into the dumpsters in the return/fill shelter. Spent antifreeze is packaged in 30-gallon steel drums and the drums are not opened at the facility.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in 5-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in the drum storage area of the warehouse. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually and the accumulation center will ship 57,000 gallons annually.

Seven solvents are collected from industrial solvent users: mineral spirits; 1,1,1-trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro- 1,2,2-trifluoroethane; and lacquer thinners. These wastes are shipped in 55-gallon drums and are stored on pallets. It is anticipated that 38,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents, and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

The drums are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications. Figures II.B.3-1 through II.B.3-4 show typical detailed construction specifications of the 16-gallon immersion cleaner drums. The containers used to store cleaning wastes are shown in Figures II.B.3-5 through II.B.3-7. Figure II.B.3-8 shows the paint waste container specifications.

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

ATTACHMENT II.B.4 CONTAINER MANAGEMENT

The immersion cleaner is always contained in partially filled, 16-gallon, covered drums before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The drums containing the used immersion cleaner are returned to the facility and stored in the designated drum storage areas before shipment to the recycle facility.

The dry cleaning wastes are contained in 16-, split 30 (also known as 20-gallon), and 30-gallon drums. The perchloroethylene from dry cleaning operations is collected in 16-gallon polyethylene drums. The dry cleaning filters are in split 30 (also known as 20-gallon) or 30-gallon steel drums. These containers are managed similarly to the used immersion cleaner drums, and contents within the drums will not be removed or processed at the facility.

Spent antifreeze is packaged in 30-gallon steel drums which are not opened at the facility.

The mineral spirits are collected in 5-, 16-, and 30-gallon steel drums. The drums are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications. Figures II.B.3-1 through II.B.3-4 depict typical detailed construction specifications of the 16-gallon immersion cleaner drums. The containers used to store dry cleaning wastes were shown in Figures II.B.3-5 through II.B.3-7.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in 5-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in the drum storage area of the warehouse.

Seven industrial solvent wastes are collected from industrial solvent users: mineral spirits; 1,1,1-trichloroethylene; per- and trichloroethylene; methylene chloride; 1,1,2-trichloro- 1,2,2-trifluoroethane; and lacquer thinners. These wastes are shipped in 55-gallon drums and are stored on pallets.

Wastes are stored in polyethylene and steel containers. Since none of the wastes handled by Safety-Kleen react with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste drums are never opened at the branch, and none of the wastes are incompatible. Safety-Kleen uses a drum color scheme as a part of its waste management system. Eight-five gallon overpack drums are used for the management of drums whose integrity has been compromised.



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II.B.4-2



FACILITY DATADrum Storage Areas

The service center has a 40' x 30' area with 6" wide by 4" high continuous curbing and three collector trenches. The maximum volume of product and waste stored is 5,197 gallons. The wastes consist of dry cleaner wastes, spent immersion cleaner (IC609 and IC699), and/or antifreeze.

The accumulation center has two areas. One is an 60' x 45' area with 6" wide by 4" high concrete curbing, collection trenches, and a sump. It has a capacity to hold 44,367 gallons of product and waste. Various halogenated and nonhalogenated solvents will be stored in this area including dry cleaner wastes. Spent immersion cleaner (IC609 and IC699) non-flammable industrial solvents and/or antifreeze. The flammable storage area has the capacity for 12,749 gallons of flammable product or waste. The area measures 45' x 45' with 6" wide by 4" high concrete curbing, collection trenches and a sump. Paint wastes, flammable industrial solvents, tank and dumpster mud will be housed in this area.

Maximum Inventory of Wastes

Drummed Waste: 49,564 gallons non-flammable and 12,749 gallons flammable.

This amount includes any combination of five-gallon pails, five-gallon drums, 16-gallon drums, 30-gallon drums, split 30-gallon drums (also known as 20-gallon drums), 55-gallon drums, and/or 85-gallon overpack drums.

CLOSURE PROCEDUREDrum Storage Areas

- ☐ The drum storage area contains drums of used immersion cleaner, mineral spirits, dumpster mud, dry cleaning wastes, paint wastes, antifreeze, and industrial (halogenated) solvents.

ATTACHMENT II.C.2

TANK SYSTEM SPECIFICATIONS

The facility includes two aboveground steel tanks (Figure II.C.2-1). 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.

MATERIAL COMPATIBILITY

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

Spent mineral spirits from parts washers is accumulated in the 15,000-gallon aboveground storage tank by transfer through the return and fill station. Five-, sixteen- and thirty-gallon drums containing five, seven, and twelve gallons of spent solvent, respectively, are poured into the dumpsters (barrel washers) in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment.

This amount includes any combination of 5-gallon pails, 5-gallon drums, 16-gallon drums, split 30 (also known as 20-gallon drums) 30-gallon drums, 55-gallon drums, and/or 85-gallon overpack drums.

c. Dumpsters: 1,512 gallons.

CLOSURE PROCEDURE

Drum Storage Areas

- The drum storage area contains drums of used immersion cleaner, mineral spirits, dumpster mud, and dry cleaning wastes.
- At closure, all drums will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the drums will be reclaimed and the drums will be cleaned for reuse.
- The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium, using SW-846 methods, to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below MCLs, or if MCLs are not available, PQLs as specified in Appendix IX of 40 CFR 264.
- If the wash water or other wastes generated in the closure process are determined to be hazardous, they will be disposed of properly as a hazardous waste; otherwise, the material will be disposed of as an industrial waste. It should be noted that wash water and rinsate will not be allowed to drain to the waterway. It is anticipated that approximately 350 gallons of rinsate will require RCRA disposal.

**INSTRUCTIONS FOR UPDATING THE PORT CHARLOTTE
OPERATING PERMIT APPLICATION
REVISION 1: 05/10/91
FLD000776716**

Replace the following pages:

<u>Page</u>	<u>Change</u>
I.D.2-2	Change in drum sizes Remove references to color
II.A.4(b)-1	Added last two sentences in paragraph three Change in drum sizes
II.A.4(b)-2	Change in drum sizes Remove references to color
II.A.4(d)-7	Change in drum sizes
II.B.3-1	Added last two sentences in paragraph two Removed references to color Change in drum sizes
II.B.6-2	Change in drum sizes
II.C.12(a)-2	Correction to shelter sizes (See Attachment II.C.7)
II.K.1-2	Change in drum sizes Correction to shelter sizes (See Attachment II.C.7)

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

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

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service stations. These wastes are deposited into a 150-gallon translucent carboy by the customer, on the customer's premises, and the carboy is pumped into a 3,500-gallon tanker truck (if handled in bulk) or into 30-gallon

ATTACHMENT II.A.4(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
FOR DAILY BUSINESS OPERATIONSGENERAL INFORMATIONPurpose

The contingency plan and emergency procedures are designed to ensure that Safety-Kleen is prepared to address emergency situations rapidly and in a manner to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or nonsudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

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

General Description of Activities

The business activities conducted at the Port Charlotte Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provisions of a solvent leasing service for the customers. Clean solvents are distributed from and the used solvents are returned to the service center, where separate storage tanks are utilized for the storage of clean and used mineral spirits (solvent) and warehouse space is designated for the storage of drums of both clean and used immersion cleaner, mineral spirits, tank bottoms, dumpster mud, antifreeze, and dry cleaning wastes (chlorinated solvent). Safety-Kleen uses a drum color scheme as part of its waste management system. Eight-five gallon overpack drums are utilized for the management of drums whose integrity has been compromised.

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II.A.4(b)-1



The mineral spirits are transported in covered, 5-, 16-, and 30-gallon drums between the service center and customers. Upon returning to the service center, the used mineral spirits are transferred from the drums into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. Used mineral spirits in the wet dumpster flow into a 15,000-gallon aboveground tank for storage. Used mineral spirits solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, drummed, and temporarily stored in the drum storage area for later shipment to the recycle facility for reclamation.

The immersion cleaner remains in 16-gallon covered drums at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Dry cleaning wastes are picked up at commercial dry cleaning establishments in 16-, split 30 (also known as 20-gallon), and 30-gallon drums and stored temporarily at the service center. The drums are picked up periodically for recycling at the recycle facility.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in 16-, split 30 (also known as 20-gallon), and 30-gallon drums with lock rings.

The antifreeze waste is approximately one-third water and two-thirds antifreeze (ethylene glycol) and contaminants. The waste is collected and stored in 30-gallon steel drums.

The waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. Used products are basically fresh products with impurities of dirt and metals. The MSDSs provided in Appendix A represent the biological, physical, and chemical properties of both the fresh and used products.

Containment Systems

Drummed Wastes

All containers are stored in the container (drum) storage area. The current storage area is totally contained by a concrete floor and berm (Figure II.A.4(d)-2). The containment system is sealed with an impermeable coating and is free of cracks. At least two foot of aisle space will be maintained and the drums will be stored no more than six-foot-high. Containers will be placed on pallets (9 16-, split 30 (also known as 20-gallon), or 30-gallon drums; or 12 5-gallon pails per pallet).

The floor has no intentional sloping. Any small spill which might occur would puddle where it was spilled. The spilled material would be cleaned up where it puddled or be manually directed to the containment trench. In the event that a large spill were to occur, some dispersion would be expected to occur based on the direction, force, and pathway obstacles presented by and to the spill. The trench protects, however, the only opening in the curbing. Only in the event that the spill were to exceed the containment capacity of the trench would spilled wastes be able to extend beyond the containment area. Once outside the containment area the wastes would continue to be on a concrete surface. This is the same concrete surface which serves to protect soils and ground water from contamination due to spills occurring during loading/unloading. The concrete area around the garage door (loading/unloading) area has no intentional slope. Again, small spills would puddle while large spills could be manually directed to the containment trench.

In the drum storage area, drums are handled with a hand-truck free of sharp points and stacked by hand. Each time a drum is moved, a possibility exists that it will be tipped over, dropped, or punctured. To minimize the possibility of spillage, drums are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe drum. Each route truck is equipped with an electric hoist. This hoist is used in the loading/unloading

ATTACHMENT II.B.3
WASTE SEGREGATION

PROCEDURE FOR SEGREGATING WASTE TYPES

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

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

The immersion cleaner is always contained in partially filled, 16-gallon, covered drums before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The drums containing the used immersion cleaner are returned to the facility and stored in the designated drum storage areas before shipment to the recycle center.

The dry cleaning wastes are contained in 16-, split 30 (also known as 20-gallon), and 30-gallon drums. The liquids are in polyethylene drums. Filters are in steel drums. These containers are managed similar to the used immersion cleaner drums and contents within the drums will not be removed or processed at the facility.

The mineral spirits are collected in 5-, 16- and 30-gallon steel drums. These drums are then emptied into the dumpsters in the return/fill shelter. Spent antifreeze is packaged in 30-gallon steel drums, and the drums are not opened at the facility.

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II.B.3-1



FACILITY DATA

Drum Storage Area:

The drum storage area was a 30' x 20' area with 6" wide x 4" high curbing and collection trench. It has a total capacity for both fresh and used materials of 2,380 gallons. The wastes handled will include mineral spirits dumpster mud drums, dry cleaner wastes, antifreeze, and/or spent immersion cleaner.

MAXIMUM INVENTORY OF WASTE

Drummed Waste: 2,380 gallons

This amount includes any combination of 5-, 16-, split 30 (also known as 20-gallon), and 30-gallon drums.

CLOSURE PROCEDURE

Drum Storage Areas

The drum storage area contains drums of used immersion cleaner, mineral spirits dumpster mud, antifreeze, and dry cleaning wastes.

- ☐ At closure all drums will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the drums will be reclaimed and the drums will be cleaned for reuse.
- ☐ The concrete floor and spill containment areas will be cleaned with detergent solution and the rinsate will be analyzed for mineral spirits, volatile organic compounds, lead, and cadmium using SW-846 methods to determine the effectiveness of decontamination. The area will continue to be washed and rinsed until levels are below maximum contaminant levels (MCLs), or if MCLs are not available, practical quantitation limits (PQLs) as specified in Appendix IX of 40 CFR 264.

Facility Data

15,000-gallon waste mineral spirits tank in a three-foot high concrete containment area.

Solvent Return/Fill Shelter Area

One 15' x 20' and one 10' x 20' shelter, with two solvent return receptacles (wet dumpsters) each and ancillary equipment.

MAXIMUM INVENTORY OF WASTE

The maximum amount of waste mineral spirits in the tank is 15,000 gallons.

Dumpsters: 1,500 gallons (four 375-gallon dumpsters).

Solvent Return/Fill Shelter Area

- ☐ This area is used to return the used mineral spirits to the storage tank.
- ☐ Closure of the solvent return receptacles (wet dumpster) will be made prior to the cleaning and removal of the storage tank.
- ☐ At closure, the sludge in the dumpsters ("dumpster mud") will be cleaned out and drummed, labeled, and manifested for proper disposal at permitted facilities.
- ☐ The dumpsters and the dock area will be cleaned with detergent solution and the rinsate analyzed for mineral spirits, volatile organic compounds, lead, and cadmium

Drum Storage Area:

A 30-foot by 20-foot area with 6-inch wide x 4-inch high curbing and collection trench. It has a capacity for 2,380 gallons of mineral spirits dumpster mud drums, dry cleaner wastes, antifreeze, and/or spent immersion cleaner.

Solvent Return/Fill Shelter:

One 15-foot by 20-foot and one 10-foot by 20-foot shelter, with two solvent return receptacles (wet dumpsters) each and ancillary equipment.

MAXIMUM INVENTORY OF WASTETank Wastes

The maximum amount of waste mineral spirits in the tank is 15,000 gallons.

Drummed Waste: 2,380 gallons

This amount includes any combination of 5-, 16-, split 30 (also known as 20-gallon), and 30-gallon drums.

Dumpsters: 1,500 gallons (four 375-gallon dumpsters)

CLOSURE PROCEDUREDrum Storage Areas

- ☐ The drum storage area contains drums of used immersion cleaner, mineral spirits, dumpster mud, antifreeze, and dry cleaning wastes.
- ☐ At closure, all drums will be removed and transported to the recycle center with proper packaging, labeling, and manifesting where the contents in the drums will be reclaimed and the drums will be cleaned for reuse.



EMBASSY
SUITES™

FAX COVER LETTER

TO: BILL CRAWFORD
FDER - TANDA

FAX #: 813.272.2279

DATE: _____

TIME: _____

FROM: MEISSA HEBASCO
SARBY-KLEEN

NUMBER OF PAGES INCLUDING COVER LETTER: 8X 10

IF ALL PAGES ARE NOT RECEIVED, PLEASE CALL: MEISSA HEBASCO

Phone #: 803-252-8700 RM 522

Our Fax #: 803-256-8749



8991



TO: Bill CRAWFORD.

ATTACHED YOU WILL FIND THE DRAFT COMMENTS
FOR TAMPA, FL DRAFT PERMIT. PLS NOTE,
THE AVAILABLE PRINTER AND SUBSEQUENT PERMIT
COMMENT LETTER ARE ~~OF~~ POOR QUALITY. A
COMPLETELY REPRINTED (LASER QUALITY) LETTER
OF THESE COMMENTS WILL ARRIVE BY
FEDERAL EXPRESS ON MONDAY. THE
LETTER WILL HAVE THE SAME INFORMATION
BUT MUCH IMPROVED LETTER QUALITY.

IF YOU HAVE ANY QUESTIONS IN THE INTERIM,
PLEASE CALL ME AT THE EMBASSY SUITES,
THE TELEPHONE INFORMATION IS IN THE COVER
SHEET.

MEISSA HERASCO.



Via Federal Express

October 22, 1991

91 MH-310

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4620 Oak Fair Boulevard
Tampa, Florida 33610

Subject: Florida DER Draft Hazardous Waste Storage Permit
Tampa, FL Service/Accumulation Center
Federal Operating Permit No. FLD 980 84/ 2/1
State Operating Permit No. H028-15882

Dear Mr. Crawford:

This has been prepared as a commentary on the subject draft document. With respect to the sections of the draft document, the following comments are offered:

Page 1 of 21, Column, Waste Type

Waste Codes 0000 and 0008 are identified as LI Toxic.

Safety-Kleen requests that citations of LI toxic be altered to reference the Toxicity Characteristic Leaching Procedure (TCLP) as Florida Department of Environmental Regulation (DER) has adopted TCLP regulations.

As stated in the draft permit, the maximum tank capacity is noted as 14,250 gallons. This amount is 95 percent capacity of the 15,000 gallon spent motor oil tank. The high level alarm becomes active at this capacity.

Safety Kleen requests that the maximum permitted storage capacity for this hazardous waste management unit be changed to 15,000 gallons.

Using 15,000 gallons as the maximum storage capacity avoid non-compliance with the permit conditions in the unlikely event tank storage exceed 14,250 gallons. It should be noted that tank volumes are recorded daily as required by the facility inspection log for tank systems. This operating record will provide documentation of each time the tank exceed 95 percent capacity. Special circumstances may require the tank volume at maximum capacity. These circumstances are as follows:

Some tank assessment protocol requires the tank at maximum capacity to ensure accurate information.

Calibration of the high level alarm may require the

3. Pa 2 of 21. Column: Source

The spent immersion cleaner formulation listed in the draft permit application is identified by the F002 and F004 waste codes.

As referenced in the permit application, Safety-Kleen is in the process of phasing out this formulation and replacing it with a non-halogenated hydrocarbon mixture.

Safety-Kleen requests that the (F002, F004) Spent Immersion Cleaner Formulation be distinguished by adding the following phrase to the Source description: "Old Formulation". Spent Immersion Cleaner, New Formulation should be added under the column entitled: Source.

Florida has adopted, but is not yet authorized to implement, the Toxicity Characteristic Leaching Procedure (TCLP) regulations. The new immersion cleaner formulation became a newly listed hazardous waste under TCLP regulations. References to both formulations of immersion cleaner are appropriately located throughout the permit application (including the waste analysis plan) reviewed by the DER. In the interim of imminent DER authorization for TCLP, Safety-Kleen requests the addition and distinction of the immersion cleaner formulations to 1) distinguish between the two formulations and 2) insure an easy transition/permit modification when DER becomes authorized to implement TCLP regulations.

4. Page 3 of 21, List of Permitted Container Sizes

The 5 gallon polyethylene container and the 55 gallon overpack container should be added to the list of combinations of containerized wastes at the facility.

The 55 gallon overpack container is used as a salvage container and may be used to house a container of inadequate integrity. Specifications for both containers were forwarded with the October 10, 1981 Port Charlotte, FL draft permit comment letter.

5. Page 9 of 21

Safety-Kleen requests that the following sentence be altered as follows: "...shall be signed by an authorized Safety-Kleen employee." It should be noted that Safety-Kleen Vice Presidents and the person attesting to the preparation of the permit application preparation sign the certification statements in the permit application. The revised sentence will not restrict information submittals due to the availability of personnel authorized for signature, but it ensures review and sign-off by a Safety-Kleen employee.

7. Page 11 of 21, General Condition 12

Safety-Kleen requests the the following sentence be altered as be altered as follows: "Amendments, in accordance with 40 CFR 270.42, must be submitted and approved in writing."

Safety-Kleen requests the insertion of 40 CFR 270.42 to insure the class one permit modification process for applicable contingency plan revisions. For example, the class one permit modification required by a telephone number.

Agency Approval

8. Page 12 of 21, General Condition 18

Safety-Kleen requests that the record retention policy (that is, the minimum amount of retention time for a document) be outlined for each listed under records of concern as required by 40 CFR 264.73 and 264.74.

As stated in the permit application, all listed record of concern must be maintained until closure of the facility. In accordance with 40 CFR 71, copies of manifests are assigned a minimum retention time of three years. Furthermore, DEN uses 264.73 or 264.74 as authority to require Safety-Kleen to maintain biennial regulations, but further review of the regulations indicate that the records need not be retained until facility closure.

9. Page 15 of 21, Specific Condition 13

The following sentence should be revised as follows: The

permittee shall comply with the requirements of 40 CFR

between containers, and between a pallet and a wall, of two feet for containers storing permitted and hazardous waste from liquids.

Safety-Kleen requests a distinction between permitted and and hazardous wastes and virgin materials.

10. Page 15 of 21, Specific Condition 14 a.

Safety-Kleen requests the deletion of this condition.

The permit application, corresponding secondary containment calculation and additional waste management practices referenced throughout the permit application are written for the permitted hazardous waste streams. The Port Charlotte, FL draft permit and the Tampa draft permit are first permits received by Safety-Kleen that reference this requirement.

11. Page 15 of 21, Specific Condition 14 b.

Safety-Kleen requests that the sentence be revised as follows: "... shall maintain the required aisle spacing in the storage area for the RCRA regulated wastes in accordance with 40 C.F.R. Part 264.35".

Please refer to comments 10 and 11 for the rationale of the request. Safety-Kleen will ensure, through internal management practices, that the 10% secondary containment practice, aisle space requirements, and waste compatibility practices be met for both RCRA and non-RCRA regulated wastes, but not as a condition of the permit.

12. Page 10 of 21, Specific Condition 10.

Safety Klean requests that the condition be reworded from "impervious" surface to "asphalt or concrete" surface.

Since asphalt and concrete are pervious and actually used for truck loading/unloading areas, the specification of truck parking surface will depict the actual facility conditions.

13. Page 10 of 21, Specific Condition 11

Safety Klean requests the following sentence be altered as follows: "No vehicles containing RCRA regulated containers or RCRA regulated wastes shall be on site...."

The revision distinguishes vehicle loads of RCRA hazardous wastes from product/non-regulated materials.

14. Page 10 of 21, Specific Condition 21

The following sentence should be revised as follows: "The permittee shall maintain, inspect, and operate the tank storage unit, appurtenant equipment and associated secondary containment structures in such a manner that any leakage or release of hazardous waste from the unit shall be detected within 24 hours of occurrence each operating day that the secondary containment structures be capable of preventing any migration...."

15. Page 10 of 21, Item C Specific Conditions of Closure

Department believes that the wording should be added in these tanks allowing for the handling and recycling/recovery of metal, rather than disposing as hazardous waste or decontamination of the tanks and other metal equipment at a closed site under the exemption for recyclable materials, 40 CFR 231.6.

Page 2 of 20. Last sentence, first paragraph

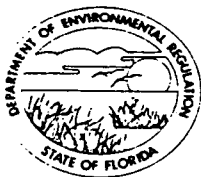
The following phrase should be altered from: "...Safety projects..." to "Safety-Klean projects". In addition, please alter the following sentence "...within 6 months..." to "...within six months of permit issuance date of the permit..."

This will distinguish a specific date for the required activities.

Thank you for your attention to this matter. If you have any questions or require further information, I am available on extension 2220.

Sincerely,

Robert H. Lyman



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 10/14*

FROM: Lynne R. Milanian *Lynne 10/17*

DATE: October 17, 1991

SUBJECT: Safety Kleen Corp., FLD 980 847 271
Tampa Service Center Application No.: HO29-158820
Response to possible releasement of hazardous
waste to the environment due to poor facility
design - see DER letter of September 5, 1991.

Attached please find documents submitted October 17, 1991 by the referenced facility which are supplement to the subject application.

This package includes information detailing:

1. 1 cover letter detailing submission of a
confirmatory sampling workplan to assess possible
contamination of groundwaters and soils.

LRM/ab
Attachment

cc: James Scarbrough, EPA Region IV

4894



D. E. R.

OCT 17 1991

SOUTHWEST DISTRICT
TAMPA

October 14, 1991

Ms. Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management
Florida Department of
Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Safety-Kleen Tampa Service Center, EPA ID # FLD 980 847 271, 24th Avenue and 54th Street

Dear Ms. Milanian:

The following letter serves to confirm your October 8, 1991 conversation with Cynthia Norton of Environmental Resources Management-South, Inc. (ERM) regarding Florida Department of Environmental Regulation's (FDER's) September 5, 1991 letter to Safety-Kleen Corp. (Safety-Kleen) concerning the above-referenced facility. To summarize your conversation, Safety-Kleen will prepare a plan to sample the ground water in the surficial aquifer, and the soils that were in direct proximity to the two discharge pipes in the North Building. However, rather than submitting this plan as a separate document, the plan will be included as part of the Confirmatory Sampling (CS) Work Plan required by the draft Hazardous and Solid Waste Amendments (HSWA) permit for the facility.

Concerning the South Building, Safety-Kleen will exercise Option 2, as referenced in the September 5, 1991 letter. Safety-Kleen will provide a signed and notarized statement confirming that a release to the environment via one of the two open trenches in the South Building has never occurred. This statement will be submitted at the same time as the CS Work Plan is submitted.

13112.19B/TSK10/LM101491.LTR/3

777 BIG TIMBER ROAD

ELGIN, ILLINOIS 60123

PHONE 708/697-8460

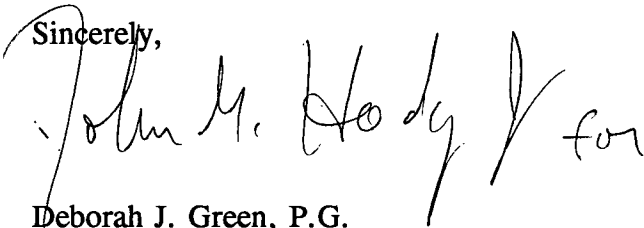
FAX 708/697-4295

8791

Ms. Lynne R. Milanian
October 14, 1991
Page -2-

If you have any questions concerning the above issues, please feel free to contact our consultant, Cynthia Norton at (813) 622-8727, or me at (919) 274-5073.

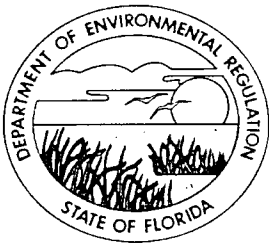
Sincerely,

A handwritten signature in cursive script that reads "John M. Hodges" followed by a large, stylized flourish that resembles a checkmark or the word "for".

Deborah J. Green, P.G.
Senior Project Manager,
Remediation

CHN/mmm/pjh

c: John G. Hodges - ERM
Melissa Hlebasko - SK, Elgin
Gary Long - SK, Elgin
Cynthia Norton - ERM
Victor San Agustin - SK Regional Engineer



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 15, 1991

WJK
10/21/91

Safer Ken

H000-158820

A, 6-C

Mr. John Dickinson, Chief
Waste Compliance Section
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, Georgia 30308

Dear Mr. Dickinson:

During our October 10, 1991 conference call we agreed to provide your staff with a schedule of inspection dates regarding our state wide inspection of Safety Kleen Facilities in Florida. Enclosed is that schedule.

We also advised you that Augusta Posner, Office of General Counsel in Tallahassee, will manage the cases as counsel if any enforcement actions result from these inspections.

Should you have any questions, please contact Michael Redig of my staff at 904-488-0300.

Sincerely,

Satish Kastury
Environmental Administrator
Hazardous Waste Regulation Section

SK/mh

Enclosure

cc: Larry Morgan
Augusta Posner
Brian Donaldson
Waste Program Administrators

Inspection Schedule

Northwest District - Pensacola

Safety Kleen - Tallahassee	FLD000776773	22 October
Safety Kleen - Tallahassee	FLD982133159	23 October

Northeast District - Jacksonville

Safety Kleen - Orange Park	FLD980847214	17 October
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Central Florida District - Orlando

Safety Kleen - Altamonte Springs	FLD097837983	29 October
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Southwest District - Tampa

Safety Kleen - Tampa (NEW)	FLD980847271	28 October
Safety Kleen - Tampa (Manhattan Blvd) Closure	FLD04957408	August 91

Southeast District - West Palm Beach

Safety Kleen - Delray	FLD000776757	16 October
Miami	FLD980840086	30 October
Boynton Beach	FLD984167791	6 November

South Florida District - Fort Myers

Safety Kleen - Port Charlotte	FLD000776716	6 November
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D. E. R.

OCT 15 1991

SOUTHWEST DISTRICT
TAMPA

October 11, 1991

Project No. 13112.19

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

RE: Notification of Change in Paint Waste Container Color for the Safety-Kleen Corp.
Tampa, Florida Facility FLD049557408

Dear Ms Milanian:

Part
CHARLOTTE

Pursuant to our conversation on October 10, 1991 with Cynthia Norton of Environmental Resources Management-South, Inc. (ERM), Safety-Kleen Corp. (Safety-Kleen) is notifying Florida Department of Environmental Regulation (FDER) of a change in color for the paint waste containers.

Safety-Kleen is requesting that all references to the color of the waste paint containers which may be contained in the Part II permit application be removed.

This notification is an administrative and informational change. No changes in management procedures, hazardous waste management units, or types of wastes handled are required. Safety-Kleen understands that since this is not a permitted waste for this facility, no permit modification is required.

↓
NOT SO

13112.19/LM101191.LTR/2

777 BIG TIMBER ROAD

ELGIN, ILLINOIS 60123

PHONE 708/697-8460

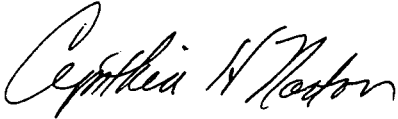
FAX 708/697-4295

85
91

Mr. Lynn Milanian
October 11, 1991
Page -2-

Should you have any questions, or require further information please contact me at (813) 682-8094 or Cynthia Norton at (813) 622-8727.

Sincerely,



for Victor San Agustin
Regional Engineer

chn/pjh

c: Melissa Hlebasko - SK, Elgin
Catherine McCord - SK, Elgin
Cynthia Norton - ERM, Tampa
Branch Manager
Part B files



Con
H028-158820
A, 6-9
✓

D. E. R.

REGULAR MAIL

September 24, 1991
91 MH-276

OCT 01 1991
SOUTHWEST DISTRICT
TAMPA

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. EPA Region IV
345 Courtland Street NE
Atlanta, GA 30365

Subject: Notification of Regulated Waste Activity Forms
Altamonte Springs (3-130-01) FLD 097837983
Tampa, FL (3-163-01) FLD 980847217
Boynton Beach, FL (3-091-01) FLD 984167791
Tallahassee, FL (3-179-02) FLD 000776773

Dear Mr. Scarbrough:

This has been prepared to forward the Notification of Regulated Waste Activity Forms for the subject Florida facilities. The forms have been forwarded to the corresponding regional office of the Florida Department of Environmental Regulation.

If you have any questions or require further information, I am available on extension 2228.

Sincerely,

Melissa Hlebasko
Environmental Permit Writer

cc: W. Crawford, FDER Tampa
B. Kellenburger, FDER Pensacola
K. Mc Kee, FDER West Palm Beach
A. Alexander, FDER Orlando
J. Hartline (w/o enclosures)
F. Stockbarger (w/o enclosures)
J. Krivec (w/o enclosures)
Branch Managers (3-179-02, 3-097-01,
3-163-01, 3-130-01)
Part B File
Chron. File

for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

FLD980847271

II. Name of Installation (Include company and specific site name)

SAFETY-KLEEN CORP. (3-163-01)

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

5309 24TH AVENUE SOUTH

Street (continued)

City or Town

State

ZIP Code

TAMPA

FL33619-

County Code

County Name

HILLBOROUGH

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

777 BIG TIMBER ROAD

City or Town

State

ZIP Code

ELGIN

IL60123-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

HARTLINE

JOSEPH

Job Title

Phone Number (area code and number)

ENV. ENGINEER

708-697-8460

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

☐☒

777 BIG TIMBER ROAD

City or Town

State

ZIP Code

ELGIN

IL60123-

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

SAFETY-KLEEN CORP.

Street, P.O. Box, or Route Number

777 BIG TIMBER ROAD

City or Town

State

ZIP Code

ELGIN

IL60123-

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner
Indicator

(Date Changed)

Month Day Year

708-697-8460

☐☒

Yes

No

120186

FED 980847271

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

1. Generator (See instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☒ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify
3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - indicate device(s) -
Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☒ b. Other Marketer
- ☐ c. Burner - indicate device(s) -
Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer
(or On-site Burner) Who First Claims
the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. EP Toxic (D000) ☒
- (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
-

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

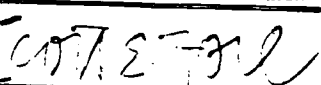
C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

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 fines and imprisonment.

Signature



Name and Official Title (type or print)

Scott E. Fore

Date Signed

2/2/0

Vice President - Env. Health & Safety

XI. Comments

Additional waste codes are listed on the attached page.

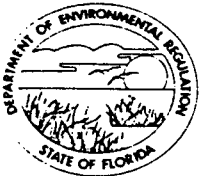
91-370

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

()

Additional Waste Codes:

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



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 *Bill Crawford 10/11*

FROM: Lynne R. Milanian *Lynne 10/11*

DATE: October 11, 1991

SUBJECT: Safety Kleen Corp., FLD 980 847 271
Tampa Service Center Application NO.: HO29-158820
Proof of Broadcast

Attached please find documents submitted October 10, 1991 by the referenced facility which are supplement to the subject application.

This package includes information detailing:

1. 1 cover letter and 1 proof of broadcast - as such
the 45 day timeframe will finish on October 23, 1991

LRM/ab
Attachment

cc: James Scarbrough, EPA Region IV

8391



Via Federal Express

October 7, 1991
91 MH-308

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610


Subject: Transmittal of Affidavit of Broadcast
Tampa, FL Service Center (3-163-01)
FLD 980847271

Dear Mr. Crawford:

This has been prepared to forward the affidavit of broadcast for the Tampa, FL draft permit. Please note, the invoice was received by Safety-Kleen on October 2, 1991

If you have any questions or require further information, I am available on extension 2228.

Sincerely,


Melissa Hlebasko
Environmental Permit Writer

cc: F. Taylor (3-163-01)
J. Davis (3-163-01)
V. San Agustin
C. Norton
F. Stockbarger
J. Krivec
Part B
Chron. File

D.E.R.
OCT 10 1991
SOUTHWEST DISTRICT
TAMPA



WFNS-AM
Sports Radio 910
7201 E. Hillsborough Avenue
Tampa, Florida 33610
(813) 620-9100 (phone)
(813) 621-5874 (fax)

AFFIDAVIT OF SERVICE RENDERED

State of Florida

SS:

County of Hillsborough

The Undersigned Having Been Duly Sworn, Deposes and Says That Broadcasting Service Has Been Rendered by Radio Station WFNS-AM in Accordance With the Accompanying Statement:

By Brent Harmon
BRENT HARMON

Subscribed and Sworn to Before

Me this 1 day of Oct 19 91

Charles R. Byers, Jr. NOTARY PUBLIC
CHARLES R. BYERS, JR.

My Commission Expires 6/15/92

INVOICE AND STATEMENT

SKC010 SAFETY-KLEEN CORP.
777 BIG TIMBER RD.
MELISSA HIEBASKO
ELGIN, IL 60123

Advertiser: SAFETY-KLEEN CORP.

BILLING DATE 9/30/91
Invoice # 911085

DATE	ACCOUNT / RUN DETAIL	LENGTH	NO RUN	RATE	AMOUNT
	BALANCE FROM LAST STATEMENT				0.00
	CONTRACT 3836 / LEGAL NOTICE				
9/ 9/91	SPOT 1:01p	150	1	250.00	250.00
	SUBTOTAL 250.00				
	Total Sales ----- 250.00		1		

FOOTBALL COLLEGE OR NFL, BASKETBALL COLLEGE
OR NBA, NHL HOCKEY IF YOU WANT IT WE HAVE IT Sales Rep: BRENT HARMON

A Finance Charge is computed by a PERIODIC RATE OF 1½% PER MONTH, which is an ANNUAL PERCENTAGE RATE OF 18%, added to the unpaid balance at the end of the next month following date of purchase.

CURRENT	30 DAYS	60 DAYS	90 AND OVER	
250.00	0.00	0.00	0.00	250.00

THIS INVOICE WAS PREPARED FROM OFFICIAL STATION PROGRAM LOGS
TIMES SHOWN ABOVE ARE ACCURATE PLUS OR MINUS 8 MIN.

PLEASE PAY THIS AMOUNT 250.00

RADIO BROADCAST

JOINT PUBLIC NOTICE OF
PROPOSED AGENCY ACTIONS
FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT
4520 OAK FAIR BOULEVARD
TAMPA, FLORIDA 33610-7347
813/623-5561
In conjunction with the
U.S. ENVIRONMENTAL
PROTECTION AGENCY
REGION IV, RCRA BRANCH
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365
404/347-3016

DER FILE NUMBER: HO29-158820

EPA FILE NUMBER: FLD980847271

INTENT TO ISSUE

The Florida Department of Environmental Regulation and the U.S. Environmental Protection Agency (U.S. EPA) give notice of their Intent to Issue joint permits under the Resource Conservation and Recovery Act, as amended by the Hazardous and Solid Waste Amendments of 1984, Section 403.722, Florida Statutes, and Chapter 17-4 and 17-730 of the Florida Administrative Code to Safety Kleen Corporation, Hillsborough County for the operation of a hazardous waste storage tank and container storage facility at 24th Avenue and 54th Street, Tampa, Florida. The two permits, if issued, will constitute the RCRA permit required by Florida DER and the U.S. EPA.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. The Federal Environmental Protection Agency will administer the applicable portions of the Hazardous and Solid Waste Amendments of 1984 until the State receives authorization for these provisions.

A person whose substantial interests are affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes. If a petition on the Department's permit is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final agency action may be different from the position taken in this preliminary statement. Additionally, persons who support the proposed agency action may also wish to intervene in the proceeding.

For more information concerning the applicable requirements of the petitioning process and the necessary time frames for filing, please contact the Tampa District Office at 813/623-5561. The application and a copy of the State permit are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Florida Department of Environmental Regulation
Southwest District Office
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
(813) 623-5561.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR 124.11. The hearing request must be in writing and should be addressed to Mr. James H. Scarbrough, U.S. EPA, at 345 Courtland Street, N.E., Atlanta, Georgia 30365 within 45 days of this notice.



D. E. R.

SEP 30 1991

SOUTHWEST DISTRICT
TAMPA

September 25, 1991
JWH 91-229

Mr. Victor San Augustin
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

Re: Incident Report
Tampa, FL 3-163-01

Dear Sir:

The following information is being submitted for an incident at the referenced facility.

Facility Operator: Safety-Kleen Corp.
777 Big Timber Rd.
Elgin, IL 60123

Facility Location: Safety-Kleen Corp.
5309 24th Avenue S.
Tampa, FL 33619

Spill occurred at S.W. corner
of Erlich and Hutchinson Rd.,
Tampa, FL

EPA I.D. Number: FLD 980847271

1. Report Date: 8/26/91
2. Person Making Report: Joe Hartline
3. Date and Time of Incident: 8/26/91 2:30 p.m approx.
4. Description of Incident: Drum fell from back of P/W truck while rounding corner - balck door was open, drum strap failed.
5. Extent of Personnel Injuries: None
6. Extent of Property Damage: 12" x 18" section of grass.
7. Description and Estimated Quantity of Any Materials Released: 1 quart approximately of waste petroleum naptha.
8. Human Health and Environmental Impact Assessment: Minimal to none.

8/91

Victor San Augustin
September 25, 1991
Page 2

9. Remedial Action Taken: Drum with spent material recovered. 12" x 18" x 8" section of grass and soil removed and recovered.
10. Estimated Quantity of Clean-Up Residue for Treatment or Disposal: 20-30 pounds of grass and dirt.

This letter also serves as notification that the spill has been cleaned up, and that all emergency equipment is again ready for use. Please contact me at (404) 438-6055 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Hartline G.B.".

Joseph Hartline
Regional Environmental Engineer

cc: C. McCord
Branch Manager, 3-163-01



Via Regular Mail

September 18, 1991
91 MH-271

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610

D.E.R.

SEP 23 1991

SOUTHWEST DISTRICT
TAMPA

Subject: Transmittal of Affidavit
Tampa, FL Service Center (3-163-01)

Dear Mr. Crawford:

This has been prepared to forward the affidavit of publication for the Tampa, FL draft permit. As determined by the publication date, the draft comment period began September 9, 1991. The affidavit of broadcast will be forwarded upon receipt.

If you have any questions or require further information, I am available on extension 2228.

Sincerely,



Melissa Hlebasko
Environmental Permit Writer

cc: F. Taylor (3-163-01)
J. Davis (3-163-01)
J. Hartline
C. Norton
F. Stockbarger
J. Krivec
Part B
Chron. File

*404-347-3433
call Susan Z.
copies of
3 HSWA permits
if send 2 to
tallah.*

THE TAMPA TRIBUNE

E. R.

Published Daily
Tampa, Hillsborough County, Florida

SEP 23 1991

State of Florida }
County of Hillsborough } ss.

SOUTHWEST DISTRICT
TAMPA

*Before the undersigned authority personally appeared
R. Putney, who on oath says that he is Accounting Manager of The Tampa
Tribune, a daily newspaper published at Tampa in Hillsborough County, Flori-
da; that the attached copy of advertisement being a*

LEGAL NOTICE

in the matter of

PUBLIC NOTICE

was published in said newspaper in the issues of

September 9, 1991

*Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has here-
tofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first pub-
lication of the attached copy of advertisement; and affiant further says that he has
neither paid nor promised any person, firm, or corporation any discount, rebate, com-
mission or refund for the purpose of securing this advertisement for publication in the
said newspaper.*

Notary Public, State of Florida

R. Putney
My Commission Expires Sept. 3, 1994

Bound by the State of Florida

Suborn to and subscribed before me, this 10 *day*

September A.D. 19 *91*

Scott D. Williams

(SEAL)

NEWSPAPER PUBLICATION
JOINT PUBLIC NOTICE OF
PROPOSED AGENCY
ACTIONS
FLORIDA DEPARTMENT OF
ENVIRONMENTAL
REGULATION
SOUTHWEST DISTRICT
4520 OAK FAIR BOULEVARD
TAMPA, FLORIDA 33610-7347
813/623-5561
In conjunction with the
U.S. ENVIRONMENTAL
PROTECTION AGENCY
REGION IV, RCRA BRANCH
345 COURTLAND STREET,
N.E.
ATLANTA, GEORGIA 30365
404/367-3016
DER FILE NUMBER:
HO29-158820

EPA FILE NUMBER:
FLD980847271

INTENT TO ISSUE

THE FLORIDA DEPART-
MENT OF ENVIRONMENTAL
REGULATION (DER) AND
THE U.S. ENVIRONMENTAL
PROTECTION AGENCY (U.S.
EPA) GIVE NOTICE OF THEIR
INTENT TO ISSUE JOINT PER-
MITS UNDER THE RE-
SOURCE CONSERVATION
AND RECOVERY ACT
(RCRA), AS AMENDED BY
THE HAZARDOUS AND SOL-
ID WASTE AMENDMENTS
OF 1984 (HSWA), SECTION
403.722, FLORIDA STATUTES
(FS), AND CHAPTERS 17-4
AND 17-730 OF THE FLORI-
DA ADMINISTRATIVE CODE
(FAC) TO SAFETY KLEEN
CORPORATION, 24th Avenue
and 54th Street, Tampa, Flori-
da, having assigned facility
I.D. number FLD 980 847 271.
The two permits, if issued, will
constitute the RCRA permit
required by Florida DER and
the U.S. EPA.

The State of Florida has
been granted authorization
for those portions of the
RCRA Hazardous Waste Pro-
gram that were in effect prior
to the passage of the Hazard-
ous and Solid Waste Amend-
ments of 1984. The Federal
Environmental Protection
Agency will administer the
applicable portions of the Haz-
ardous and Solid Waste
Amendments of 1984 until the
State receives authorization
for these provisions.

A draft permit, prepared in
accordance with the provi-
sions of Chapter 17-730, FAC,
contains the conditions for the
operation of the hazardous
waste storage facility at 24th
Avenue and 54th Street, Tam-
pa, Hillsborough County, Flori-
da. The proposed facility will
manage hazardous waste
storage units. Storage of
wastes is in containers and a
tank as follows:

South Building

(Accumulation Center)
 Type of EPA Hazardous
 Waste Waste Number
 Ignitable Solvent D001
 EP Toxic D006, D007, D008
 Metals
 Chlorinated Solvents F001, F002
 Non-Halogenated Solvents F003, F004, F005
 The South Building will support a maximum drum storage capacity of 57,116 gallons.
 North Building
 (Service Center)

Type of EPA Hazardous
 Waste Waste Number
 Chlorinated Solvents F002
 Non-Halogenated Solvents F004
 The North Building will support a maximum drum storage capacity of 5,197 gallons.
 Storage Tank

Type of EPA Hazardous
 Waste Waste Number
 Maximum Capacity
 Ignitable Solvent D001
 14,250 gallons
 EP Toxic Metals D006, D008

The Federal draft permit contains conditions requiring the facility to investigate prior/continuing releases of hazardous waste or constituents from solid waste units. The Federal draft permit also sets conditions for certification of waste minimization and compliance with landban regulations. FDER and EPA have made a preliminary determination that the proposed permits will comply with applicable state and federal regulations.

The application and a copy of both state and federal proposed permits are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Florida Department of Environmental Regulation, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

The proposed U.S. EPA permit and statement of basis are available for public inspection Monday through Friday, except legal holidays, from 8:00 a.m. to 5:00 p.m. at the U.S. EPA Library, 345 Courtland Street, N.E., Atlanta, Georgia 30365. All data submitted by the applicant to the U.S. EPA is available as part of the administrative record at the above address.

Any interested person may submit written comments on this proposed State agency action to the Department of Environmental Regulation, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347, or the proposed U.S. EPA action to the U.S. Environmental Protection Agency, Region IV, 345 Courtland Street, N.E., Atlanta, Georgia 30365 Attention: Mr. James H. Scarbrough, within forty-five (45) days of publication of this notice. All comments on the facility will be considered by both agencies in formulating a decision on issuing the respective permits.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-103, and 28-5, Florida Administrative Code. Any person may request a public meeting pursuant to Section 403.722(10), Florida Statutes. The request for a hearing or meeting must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within forty-five (45) days of publication of this notice. Failure to file a request for hearing within this time frame shall constitute a waiver or any right such person may have to request a hearing under Section 120.57, FS, or a meeting under Section 403.722(10), Florida Statutes.

If a petition on the Department's permit is filed, the administrative hearing process is designated to formulate

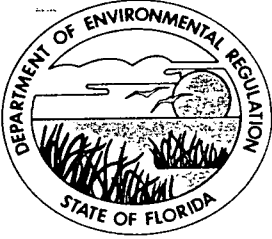
agency action. Accordingly, the Department's final action may be different from the proposed agency action. Persons whose substantial interests have been affected by any decision of the Department have the right to intervene in the proceeding. A petition for intervention must be filed pursuant to Section 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer, if one has been assigned, at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

Any interested person may submit comments on the draft federal permit and may request a hearing pursuant to 40 CFR 124.11. The hearing request must be in writing and must include a written notice of opposition to the draft federal permit. Hearing requests should be addressed to Mr. James H. Scarbrough, U.S. EPA, at the above address within 45 days of this notice.

A copy of the proposed U.S. EPA permit may be obtained by contacting Mr. James H. Scarbrough, U.S. EPA at the above address. A nominal fee for copying and/or mailing may be charged.

4158

9/9/91



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

September 5, 1991

Ms. Ellen Jurczak, P.E.
Environmental Permits Manager
Safety-Kleen Corp.
777 Big Timber Road
Elgin, ILL 60123

Re: Possible Contamination Assessment
Tampa Service Center, FLD 980 847 271
24th Avenue and 54th Street

Dear Ms. Jurczak:

As you will recall, during a meeting held in our offices on October 16, 1990, numerous discussions occurred referring to possible releasements of hazardous waste to the environment due to the design of the service center.

Briefly, we examined the grated manhole and floor drain found in the north building (which conveyed contents to the on-site septic system) and the two open containment trenches located in the south building (which discharges to the on-site stormwater retention pond).

In view of this scenario, the Department proposes the following solution which we believe may establish assurances that contamination has not occurred.

North Building

Safety-Kleen must prepare a document detailing plans to sample the groundwater in the surficial aquifer and possibly the soils that were in direct proximity of the two discharge pipes. It will be necessary to first determine if each pipe had its respective discharge or if the two pipes comingled, entered a septic container and then were released to the environment via a drainfield septic arrangement. Sampling methodology, parameters to be analyzed and quality assurance and control must be presented for Department review prior to conducting actual field work.

South Building

Ms. Ellen Jurczak
Safety-Kleen Corp.

September 9, 1991
Page Two

Safety-Kleen has two options. First, provide a sampling scheme as detailed above for the drainage swale, county owned ditch and on-site stormwater retention pond. Second, provide a signed and notarized statement that a releasement to the environment via one of the two open trenches has never occurred. The Department is suggesting the second option based on two factors, the first being the manner in which the service center is operated in that management practices are exemplary and there is no evidence of a release and second that a large amount of waste would have to be released in order to exceed the containment system's capacity to facilitate a releasement.

The Department requires your written response to the issues addressed within thirty days of receipt of this notice. Do not hesitate to contact me at (813) 623-5561, ext. 389, should you have any questions.

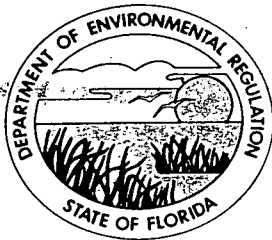
Sincerely,



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

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee



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

August 28, 1991

Mr. Joseph Hartline
Compliance Engineer
Safety-Kleen Corporation
4800 S. Old Peach Tree Road
Norcross, GA 30071

Re: Safety-Kleen Corp., Tampa Site, FLD 980 847 271
Activation of Fire Sprinkler System
Operating Permit Application NO. Ho29-158820

Dear Mr. Hartline:

The Department understands that Safety-Kleen has put out contracts for bids concerning the Tampa Service Center's Fire Sprinkler System.

During the interim, the RCRA permitting staff would like to take final action on the pending operating permit. As such, the Department requests that you provide a date as to when a fire sprinkler system will be available at the site. Upon installation of the system appropriate narrative changes to the operating permit application will be advised, as well as information and specifications detailing what type of fire protection has been selected.

Do not hesitate to contact me should you have any comments at (813) 623-5561, ext. 389.

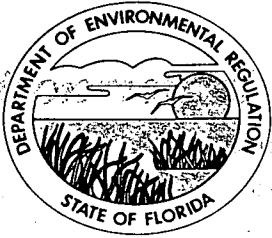
Sincerely,

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

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee
Ellen Jurczak, Safety-Kleen/Elgin
Cynthia Norton, ERM-South





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

August 20, 1991

Scott E. Fore
v.p., Env. Health & Safety
Safety Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

Re: Operating Permit Application
File No. HO29-158820
Tampa Service Center, FLD 980 847 271

Dear Mr. Fore:

The Department has determined that the above referenced application was deemed complete on August 15, 1991. As provisions detailing financial assurance for closure and financial responsibility for liability have been established by Safety-Kleen, we will strive to expedite the preparation of the intent to issue for the operating permit.

We have appreciated the very professional attitude displayed by your staff as well as your consultant and the timely submissions provided to the Department. Do not hesitate to contact me should you have any questions at (813) 623-5561, ext. 389.

Sincerely,

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

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee
Hooshang Boostani, HCEPC
Ellen Jurczak, Safety-Kleen
Cynthia Norton, ERM-South





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

H029-158820

A, 6-i

D.E.R.

AUG 12 1991

4WD-RCRAFFB

Mr. Victor San Agustin, P.E.
Hazardous Waste Section
Division of Waste Management
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

AUG 15 1991

SOUTHWEST DISTRICT
TAMPA

RE: Draft HSWA Permit for Safety-Kleen Corporation
Tampa, Florida Facility
EPA I.D. Number 980 847 271

Dear Mr. San Agustin:

Enclosed please find a copy of the draft Hazardous and Solid Waste Amendments (HSWA) permit for Safety-Kleen's Tampa facility. Please proceed with the joint issuance of the public notice of this draft HSWA permit.

Should you have any questions on this matter, please contact Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Satish Kastury, FDER, Tallahassee
Lynn Millenian, FDER, Tampa

FDER - RCRA PROGRAM

EVALUATION - VIOLATION - ENFORCEMENT FORM 1

LDF ☐ TSF ☐ INC ☐ LQG ☐ SQG ☐ TRA ☐ CES ☐ NHR ☐

Date Submitted: ___/___/___ By: _____ Date Entered: ___/___/___ By: _____

EPA ID # F14098108472711 County: HILLSBOROUGHFacility Name: SAFETY KLEENStreet: 27th Ave + 54th StCity: TAMPAEVALUATION DATA Add: ☐ Update: ☐ Delete: ☐ (☐ = Required Field)

Evaluation Date	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	Inspector
Mo. Day Year <u>06</u> / <u>19</u> / <u>90</u>	<u>1</u>	<u>S</u>	<u>OTIR</u>	<u>1</u>	<u>SC</u>	<u>LMH</u>

Coverage Areas (EV = Evaluated, NE = Not Evaluated, NA = Not Applicable)

Generators				Transporters				TSDF's											
	EV	NE	NA		EV	NE	NA	E N N				E N N				E N N			
								V E A	V E A	V E A	V E A	V E A	V E A	V E A	V E A				
GER	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TGR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DCH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GGR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DCL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GLB	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DCP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DLT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DSI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DFR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DMC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TWR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DGS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DMR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DTT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GPT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TWD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DGW	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DOR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DWP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GRR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					DIN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DOT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
GSC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
GSQ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
NHD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																

Compliance Schedule (TSD, GEN, TRA)

EV NE NA EV NE NA
FEA ☐ ☐ ☐ CAS ☐ ☐ ☐

Evaluation

Comments:

(72) 1: cert. fraction of completion of construction inspectionVIOLATION DATA Add: ☒ Upd: ☐ Del: ☐ Dist: ☐ Inspector: ☐Violation Date (mdy) Determined (Data Entry)
Agency: S Type: DMC 08 / 03 / 90 Seq. # 1Class Priority Return to Compliance: 1 1 11 / 03 / 90 Actual: 17 / 18 / 91Reg. Type: 1 Reg. Description (30): 264.175 - inadequateComment (72): secondary containmentVIOLATION DATA Add: ☒ Update: ☐ Delete: ☐Violation Date (mdy) Determined (Data Entry)
Agency: S Type: OTIR 08 / 03 / 90 Seq. # 1Class Priority Return to Compliance: 1 1 11 / 03 / 90 Actual: 07 / 18 / 91Reg. Type: 1 Reg. Description (30): 264.192-13 tank certificationComment (72): VIOLATION DATA Add: ☒ Update: ☐ Delete: ☐Violation Date (mdy) Determined (Data Entry)
Agency: S Type: DMC 08 / 03 / 90 Seq. # 1Class Priority Return to Compliance: 1 1 11 / 03 / 90 Actual: 07 / 18 / 91Reg. Type: 1 Reg. Description (30): Comment (72): 264.31 - floor drains

FDER - RCRA PROGRAM FORM 1B

Entered by: _____

Date: ___/___/___

EVALUATION - VIOLATION - ENFORCEMENT

Submitted by: _____

Date: ___/___/___

FDER/EPA ID NUMBER:

FCL09808472711

Facility Name: Safety Kleen

VIOLATION DATA

Add: ☐Up: ☐Del: ☐Dist: ☐

Inspector

Agency: S Violation Type: DPB Date (mdy) Determined: 08/03/90 Seq.# 1

Class Priority

Return to

Sched. --

Actual

17Compliance: 11/03/9007/13/91

Reg.

Type:

Reg. Description (30):

403.227(c)(2) - Failure to

Comment (72):

Percent by record drawing

ENFORCEMENT DATA

Add: ☐Update: ☐Delete: ☐(☐ = Required Field)Respon
Agency:Enforcement
Type:Date Action Taken
Month Day YearEnforcement
Sequence Number
(Data Entry Only)S12009/26/90 Inspector: District:

Comment (72):

Violations Addressed:

#	Area	#	Area	#	Area	#	Area

Penalty Data

Assessed Amount:

\$

Settled Amount:

\$

Payment:

\$									
\$									
\$									
\$									

Date Paid:

ENFORCEMENT DATA

Add: ☒Update: ☐Delete: ☐(☐ = Required Field)Respon
Agency:Enforcement
Type:Date Action Taken
Month Day YearEnforcement
Sequence Number
(Data Entry Only)S31007/13/91 Inspector: District:

Comment (72):

 consent order

Violations Addressed:

#	Area	#	Area	#	Area	#	Area
<u>1</u>	<u>DMC</u>						
<u>2</u>	<u>OTR</u>						
<u>3</u>	<u>PPP</u>						
<u>4</u>	<u>DPB</u>						

Penalty Data

Assessed Amount:

\$

Settled Amount:

\$ 30500

Payment:

\$									
\$									
\$									
\$									
\$									
\$									

Date Paid:

Enforcement

Comments (74):

1: corrected permit application submitted 5/20/912:

Rev(6/27/91)

EPA I.D. # FLDA80847271
HANDLER NAME: Safety-Kleen Corporation
ADDRESS: 24th Ave. and 5th St (P.O. Box 1045)
Brandon, FL 32249-1045
COUNTY: Hillsborough
DATA ENTRY: (Circle One) NEW UPDATE

2a. Type Facility: (Circle One)
Treat/Store/Dispos
Non-Handler
Transporter
Generator
Small Quan. Generator
Cond. Exempt S.Q.G.
Exempt
2b. Type Ownership: (Circle One)
Federal
County
Private
State
Municipal

DATE OF INITIAL EVALUATION WHICH IS THE BASIS OF THIS REPORT 6, 19, 90
AGENCY RESPONSIBLE FOR EVALUATION: (Circle One) EPA
State
Contractor/EPA
Other
Contractor/State
Oversight

TYPE OF EVALUATION COVERED BY THIS REPORT: *

= Compliance Eval. Inspection (CEI) 8 = Other - Withdrawal Candidate
= Sampling Inspection 9 = Other - Closed Facility
= Record Review 10 = Other - General
= Comprehensive GWM Evaluation (CME) 11 = Case Development Inspection
= Compliance Schedule Evaluation 12 = O & M Inspection
= Other (Citizen Complaint) 13 = CA Oversight Inspection
= Other - Part B Call-in 80 = Informal Meeting

(Put Code in Box)

10 80
60

DATE OF EVALUATION COVERED BY THIS REPORT (Enter Only if Different from 5): 10, 16, 90

EVALUATION COMMENTS: Conducted site inspection to verify certification of completion
of construction. Noted many discrepancies as prepared
enforcement referred.

CLASS AND VIOLATIONS:

Key

Violation: 0 = No Violation; Z = Pending
iol. & Specialty; S = Same Viol./Spec.

Specialties

o Insurance only; C = CA Sched. Viol.
PV Violations Present * Class I only

Class of Violation	Violation/Releases							
	GHM/RLSE	C/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Other	Land-Ban
I				X			X	
II								
Acceptable codes	X S Z O H	X S Z O H	X S Z O I B H	X S Z O H	X S Z O C B H	X S Z O H	X S Z O H	X S Z O H

Violation Comment:

ENFORCEMENT ACTIONS: (Area of Viol./Rlse. = GW, CP, FR, PB, CS, MA, OT, LB, or AA)

Class	Area of Viol./Rlse	Rule	Type (code)	Date Action Taken	Compliance Dates Scheduled	Actual	Penalty Assessed	Collected	Resp. Ag. (use code)
I	OT	264.175	7	7/18/91	7/18/91	7/18/91			7
I	OT	264.192	1						1
I	OT	264.193	1						1
I	OT	264.31	1						1
I	P+B	403.7271C	03	9-26-90	7-26-91	7/18/91	30,500		S
			05	7-18-91	7/18/91				

as for 03 = Warning Letter
es of EPA Warn. NOV Ltr.
rcement 04 = NOV
ions: EPA Admin. Compl.

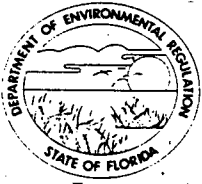
05 = CO
EPA Final Admin. Order
10 = Informal
11 = Filed Civil Action

12 = Filed Criminal Action
14 = NOV to EPA
18 = Civil Referral to AG/DOJ
19 = Final Judicial Order

Codes for Resp. Agency:
E = EPA
S = State
X = EPA - Oversight

* See Instructions for Additional Codes

Enforcement Comment:



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

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

Interoffice Memorandum

Aug 15, 91

TO: Satish Kastury *VSA*
THRU: Victor San Agustin
Bill Crawford *WC*
FROM: Lynne R. Milanian *lynne 8/15*
DATE: August 14, 1991
SUBJECT: Safety-Kleen Corp., Tampa Facility, FLD 980 847 271
Application File No. HO29-158820
Application Completion Items

Attached please find documents submitted August 9 and August 15, 1991 by the referenced facility which are supplement to the subject application/permit.

This package includes information detailing:

1. 1 cover letter, replacement instructions and
application pages. Two copies of each document.

LRM/ab
Attachment

cc: James Scarbrough, EPA Region IV

7491



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 20, 1991

14029-~~1468~~

Mr. Joseph Hartline
Regional Environmental Manager
777 Big Timber Road
Elgin, Illinois 60123

A. ~~Handwritten signature~~

Re: Safety Kleen, Tampa, Florida
FLD 980 847 271

Dear Mr. Hartline:

I find your revised closure cost estimate of \$130,022.00 for the Tampa facility acceptable. The financial responsibility requirements for all Safety Kleen facilities in Florida have been met for this year.

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: Betty Willis, EPA
Bill Crawford, DER Tampa ✓
Doug Outlaw, DER Tallahassee

ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 • Fax (813) 621-8504
8181 N. W. 36th Street, Suite 20 • Miami, Florida 33166 • (305) 591-3076
777 Yamato Road, Suite 130 • Boca Raton, Florida 33487 • (407) 241-1752

Reply To: Tampa Office

August 15, 1991

Project No. 13112.19, Task 10

Ms. Lynne Milanian
Waste Management Permitting
Florida Department of
Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

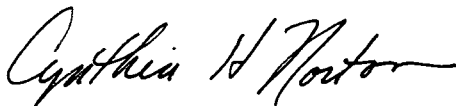
RE: Safety-Kleen Corp. Tampa--Operating Permit Application

Dear Ms. Milanian:

Enclosed are six copies of pages II.C.2-3 and II.C.9-2 which address Safety-Kleen's procedure for handling rainwater accumulated in the tank farm.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Cynthia H. Norton
Project Manager

pjh

Enclosure(s)

c: Joe Hartline - S-K, Atlanta
Melissa Hlebasko - S-K, Elgin
Ellen Jurczak - S-K, Elgin
Branch Manager - Tampa

AUG 15 1991
RECEIVED

13112.19B/TSK10/01/LM081591.LTR/1



An affiliate of The Environmental Resources Management Group with offices throughout North America



7291

ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 • Fax (813) 621-8504

8181 N. W. 36th Street, Suite 20 • Miami, Florida 33166 • (305) 591-3076

777 Yamato Road, Suite 130 • Boca Raton, Florida 33487 • (407) 241-1752

Reply To: Tampa Office

August 8, 1991

Project No. 13112.19, Task 10

Ms. Lynne Milanian
Waste Management Permitting
Florida Department of
Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

D. E. R.

AUG - 9 1991

SOUTHWEST DISTRICT
TAMPA

RE: Safety-Kleen Corp. Tampa Operating Permit Application

Dear Ms. Milanian:

Thank you for meeting with me on July 25, 1991 to discuss your review comments on the above-referenced operating permit application. This package has been prepared in response to those comments. This package consists of three parts.

Part 1 - Responses to your comments.

Part 2 - Pages, including replacement instructions, which need to be replaced in response to your comments.

Part 3 - Additional pages which need to be replaced to update the application package.

Thank you for your prompt attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Cynthia H. Norton
Project Manager

pjh

Enclosure(s)

c: Joe Hartline - S-K, Atlanta
Melissa Hlebasko - S-K, Elgin
Ellen Jurczak - S-K, Elgin

13112.19B/TSK10/LM080891.LTR/3



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FEDERAL EXPRESS

August 1, 1991
91 MH-225

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division - U.S. EPA/ Region IV
345 Courtland Street NE
Atlanta, GA 30365

Subject: RCRA Air Emissions Standards
Tampa, FL Service Center (3-163-01)

D. E. R.

AUG - 5 1991

SOUTHWEST DISTRICT
TAMPA

Dear Mr Scarbrough:

This letter has been prepared to forward information as required under 40 CFR 270.24 and 270.25 for the above referenced facility.

Safety-Kleen's Tampa facility does not have process vents to which subpart AA of part 264 applies, so section 270.24 is not applicable.

The following information is required under section 270.25:

270.25(a)

1. Equipment is associated with the 15,000 gallon used mineral spirits tank and the proposed 20,000 gallon used antifreeze tank.
2. A site plan identifying the hazardous waste management units at the facility is enclosed. Also enclosed are complete equipment inventory forms listing each piece of regulated equipment.
3. Types of equipment include pumps, flanges and valves.
4. The hazardous waste streams are spent mineral spirits and spent antifreeze which can be considered to contain 100 % organics. The spent antifreeze, however, can contain up to 1/3 water.
5. The hazardous waste state of mineral spirits and antifreeze is liquid.

6. The equipment is considered to be heavy liquid service (mineral spirits vapor pressure is 2 mm Hg or 0.01 kPa). Compliance with the standard (264.1058) will be achieved through daily facility inspections and, if required, leak detection monitoring and repair. A copy of the daily inspection record and leak detection and repair record for equipment is enclosed.

Sections 270.25(b), (c), and (e) are not applicable to Safety-Kleen's Tampa Facility.

270.25(d)

Safety-Kleen maintains in the facility, an operating record. this record provides a place by which the required information is recorded under 264.1064. The enclosed forms and plans contain the necessary information.

Please note, the ethylene glycol tank has not been constructed. Since the design of tanks and piping configurations generally conforms to a standard configuration, a proposed piping isometric is in the process of being prepared. This drawing and associated information will be forwarded immediately upon completion.

Thank you for your patience in this matter. I am available on extension 2228 if you have any questions or require further information.

Sincerely,



Melissa Hlebasko
Environmental Permit Writer

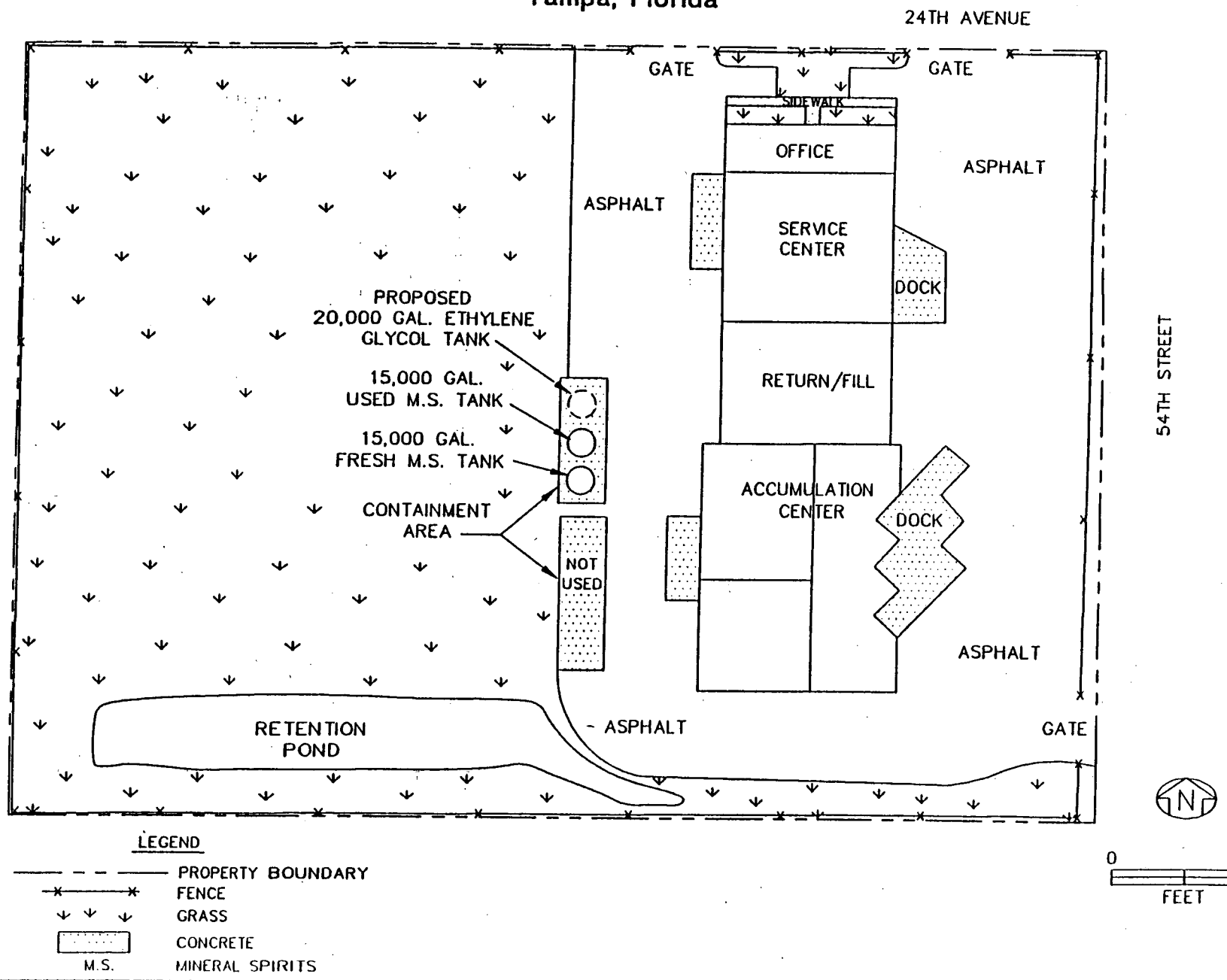
cc: S. Zazalli, EPA Region VI
Branch Manager (3-163-01)
J. Hartline
F. Stockbarger
C. Norton
W. Crawford, FDER
Part B File
Chron. File

13112.19/311198M/042791

I.B.3-1A



Figure I.B.3-1
Site Layout Map
Safety-Kleen Corp. Facility
Tampa, Florida

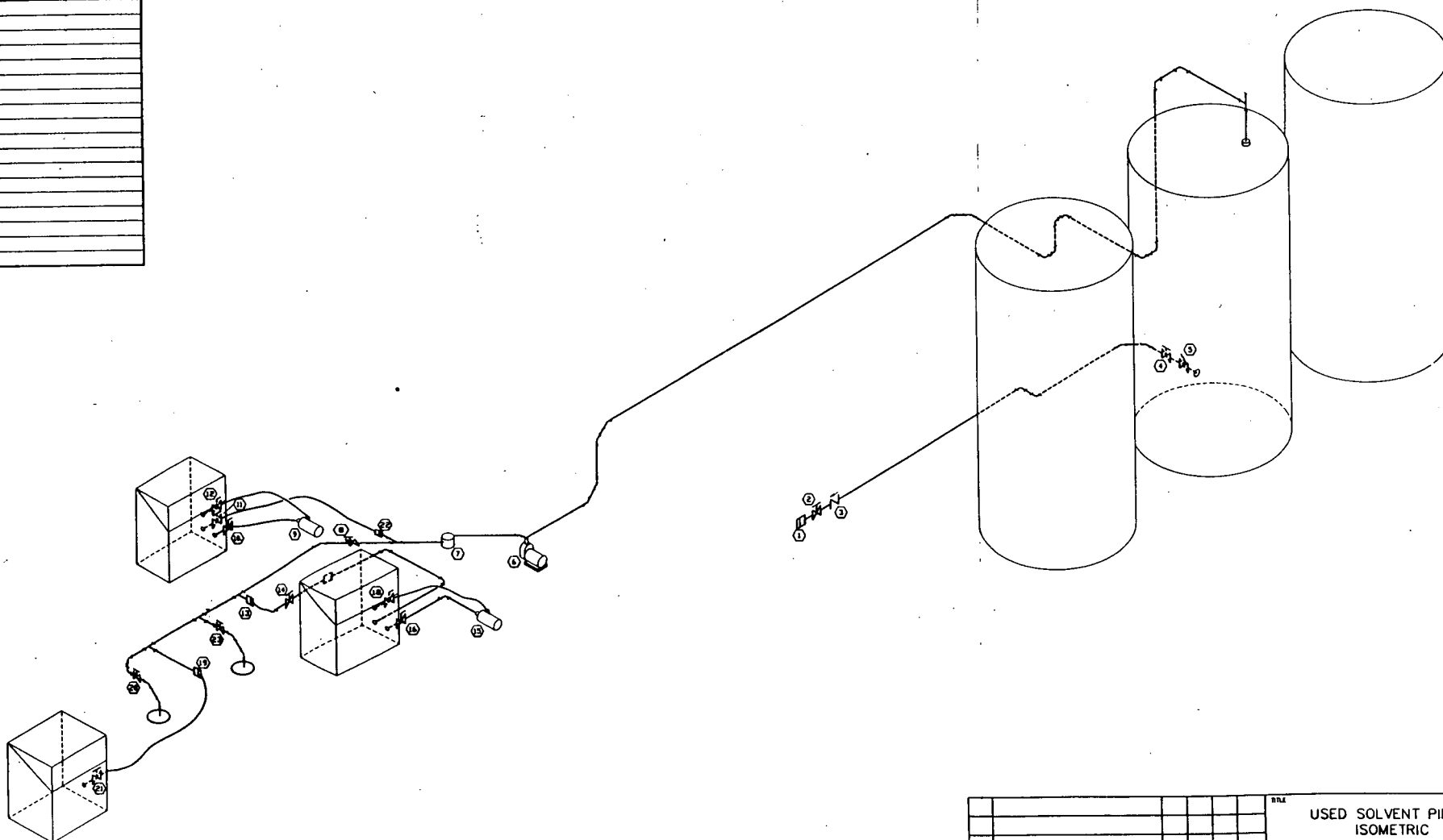


EQUIPMENT SCHEDULE

MARK	DESCRIPTION
1	2" CAMELOCK
2	2" GATE VALVE
3	2" CHECK VALVE
4	2" GATE VALVE
5	2" GATE VALVE
6	2" INTERNAL EMERGENCY GATE VALVE
7	USED SOLVENT PUMP
8	STRAINER ASSEMBLY
9	2" GATE VALVE
10	RECIRCULATING PUMP
11	1 1/2" BALL VALVE
12	2" GATE VALVE
13	1 1/2" BALL VALVE
14	2" CAMELOCK
15	2" GATE VALVE
16	RECIRCULATING PUMP
17	1 1/2" BALL VALVE
18	1 1/2" BALL VALVE
19	2" CAMELOCK
20	2" BALL VALVE
21	2" GATE VALVE
22	2" CAMELOCK
23	2" BALL VALVE

GENERAL NOTES

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



TITLE										USED SOLVENT PIPING ISOMETRIC									
777 BIG THREE ROAD EL CUN, BL. POB 1 0423 PHONE 780-657-0440										SAFETY-KLEEN CORP.									
1										SCALE									
NO										BY									
DESCRIPTION										DATE									
BY										DATE									
DATE										DATE									
REVISIONS										SERVICE CENTER LOCATION									
										TAMPA, FL									
										316301-2002-01									

VALVE LIST

DATE July 31, 1991BRANCH # 3-163-01

PREPARER'S

SIGNATURE R. Hildner

VALVE SIZE	INDIVIDUAL VALVE NUMBER	VALVE TYPE	HAZARDOUS WASTE MANAGEMENT UNIT	LOCATION
3"	2	GATE	ANCILLARY EQUIPMENT - DRAIN	Refer to site plan and piping isometric drawings
3"	3	CHECK	"	"
3"	4	GATE	SPENT MINERAL SPIRITS TANK	"
3"	5	GATE	"	"
2"	8	GATE	ANCILLARY EQUIPMENT - RETURN + FILL	"
1 1/2"	10	BALL	"	"
2"	11	GATE	"	"
1 1/2"	12	GATE	"	"
2"	14	GATE	"	"
1 1/2"	16	BALL	"	"
1 1/2"	18	BALL	"	"
2"	20	BALL	"	"
2"	21	GATE	"	"
2"	23	BALL	"	"

EQUIPMENT INVENTORY

TO BE FILLED OUT AT THE BRANCH AND KEPT IN THE OPERATING RECORD (FILE 1070) WITH THE SITE PLAN AND PUMP AND VALVE LIST

Listed on the attached pump list and valve list is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The equipment is also identified on the attached site plan.

The hazardous waste influent to and effluent from the hazardous waste management unit(s) is spent mineral spirits (D001, D004-D011, D018, D019, D021-D030 and D032-D043). Tanks are used for storage of spent mineral spirits which is usually 100% by weight organic. The vapor pressure of mineral spirits at 68° F is 0.27 kPa (equivalent to 2 mm Hg - see MSDS and the attached EPA guidance document page). The waste stream has a vapor pressure equal or lower than that of the clean mineral spirits due to contamination during use with oil, grease and sediment and it is in a liquid state at the equipment, so all equipment is in contact with materials defined as heavy liquid under the cited regulations.

Equipment associated with the waste antifreeze tank(s) is also in heavy liquid service. Ethylene glycol has a vapor pressure at 68° F of .08 mm Hg or 0.01 kPa and is usually 100% organic.

Compliance with the standard (264.1058) will be achieved through daily facility inspections, and if required, leak detection monitoring and repair. The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment monitoring and repair are maintained on a separate form in the operating record.

LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D.# _____
 DESCRIPTION _____

BRANCH # _____

	DATE	INSPECTOR'S SIGNATURE
HOW WAS POTENTIAL OR ACTUAL LEAK DETECTED? _____	_____	_____

DESCRIBE THE POTENTIAL OR
 ACTUAL LEAK: _____

INSTRUMENT MONITORING WITHIN
 FIVE DAYS

(1.) RESULTS _____

REPAIR ATTEMPT
 METHOD _____

(2.) RESULTS _____

REPAIR ATTEMPT
 METHOD _____

(3.) RESULTS _____

DATE OF SUCCESSFUL REPAIR
 (must be completed w/in 15 days) _____

(4.) METHOD _____
 RESULTS _____

FOLLOWUP MONTHLY MONITORING FOR VALVES

(5.) RESULTS _____

(6.) RESULTS _____

MONITORING SUMMARY

INSTRUMENT #/OPERATOR
 CALIBRATION
 BACKGROUND READING
 READING AT EQUIPMENT
 LEAK DETECTED?

(REFERENCE NUMBER - SEE ABOVE)
 (1) (2) (3) (4) (5) (6)

_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

INSPECTOR NAME/TITLE: _____

INSPECTOR'S SIGNATURE: _____

MON TUES WED THURS FRI

DATE: (M/D/Y) _____

TIME: _____

Pump, Valve or Flange Number

1	A	N	A	N	A	N	A	N	A	N
2	A	N	A	N	A	N	A	N	A	N
3	A	N	A	N	A	N	A	N	A	N
4	A	N	A	N	A	N	A	N	A	N
5	A	N	A	N	A	N	A	N	A	N
6	A	N	A	N	A	N	A	N	A	N
7	A	N	A	N	A	N	A	N	A	N
8	A	N	A	N	A	N	A	N	A	N
9	A	N	A	N	A	N	A	N	A	N
10	A	N	A	N	A	N	A	N	A	N
11	A	N	A	N	A	N	A	N	A	N
12	A	N	A	N	A	N	A	N	A	N
13	A	N	A	N	A	N	A	N	A	N
14	A	N	A	N	A	N	A	N	A	N
15	A	N	A	N	A	N	A	N	A	N
16	A	N	A	N	A	N	A	N	A	N
17	A	N	A	N	A	N	A	N	A	N
18	A	N	A	N	A	N	A	N	A	N
19	A	N	A	N	A	N	A	N	A	N
20	A	N	A	N	A	N	A	N	A	N
21	A	N	A	N	A	N	A	N	A	N
22	A	N	A	N	A	N	A	N	A	N
23	A	N	A	N	A	N	A	N	A	N
24	A	N	A	N	A	N	A	N	A	N
25	A	N	A	N	A	N	A	N	A	N
26	A	N	A	N	A	N	A	N	A	N
27	A	N	A	N	A	N	A	N	A	N
28	A	N	A	N	A	N	A	N	A	N
29	A	N	A	N	A	N	A	N	A	N
30	A	N	A	N	A	N	A	N	A	N
31	A	N	A	N	A	N	A	N	A	N
32	A	N	A	N	A	N	A	N	A	N
33	A	N	A	N	A	N	A	N	A	N
34	A	N	A	N	A	N	A	N	A	N
35	A	N	A	N	A	N	A	N	A	N

If "N", enter pump, valve or flange # _____ and circle appropriate problem: potential leak, actual leak, sticking, wear, does not operate smoothly, other: _____

For all leaks and potential leaks, the Leak Detection and Repair Record must be completed.

* A = ACCEPTABLE
N = NOT ACCEPTABLE

Draw a line through I.D. numbers which do not apply.

United States
Environmental Protection
Agency

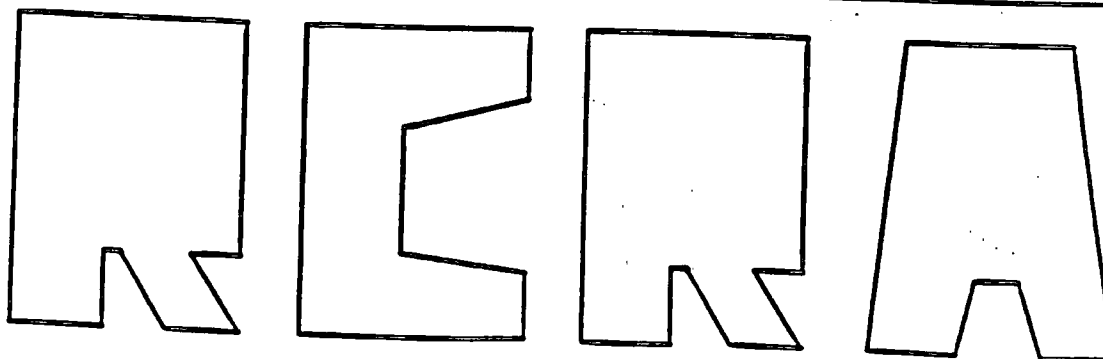
Office of Air Quality
Planning and Standards
Research Triangle Park NC 27711

EPA-450/3-89-021
July 1990

Air



Hazardous Waste TSDF - Technical Guidance Document for RCRA Air Emission Standards for Process Vents and Equipment Leaks



REPRODUCED BY
U.S. DEPARTMENT OF COMMERCE
NATIONAL TECHNICAL
INFORMATION SERVICE
SPRINGFIELD, VA 22161

TABLE 6-3. VAPOR PRESSURES OF COMMON SOLVENTS

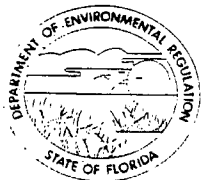
	VP @ 20°C, kPa (mm Hg)		Most appropriate analytical method
Halogenated Solvents			
Methylene chloride	45.2	(340)	EPA Method 8240
1,1,1-Trichloroethane	2.3	(17)	EPA Method 8240
Trichloroethylene	7.8	(59)	EPA Method 8240
Perchloroethylene	1.7	(13)	EPA Method 8240
Methyl ethyl ketone	9.4	(70.6)	EPA Method 8240
Methyl isobutyl ketone	2.1	(16)	EPA Method 8240
Toluene	5.1	(38)	EPA Method 8240
Acetone	24.6	(185)	EPA Method 8240
Xylene(s)	1.3	(9.5)	EPA Method 8240
Mineral spirits	0.27	(2.0)	ASTM E 260
Alcohols			
Isopropyl alcohol	4.1	(31)	ASTM E 260
Methanol	12.7	(96)	ASTM E 260
Ethanol	5.9	(44)	ASTM E 260

VP = vapor pressure.

VP = vapor pressure.

VOC Air-Emissions Calculations

	Methylene Chloride	1,1,1- Trichloro ethane	Trichloro ethylene	Perchloro ethylene	Mineral Spirits	Acetone	Toluene	Methanol	Ethanol
Atmos. pressure (mm Hg):	760.0	760.0	760.0	760.0	760.0	760.0	760.0	760.0	760.0
Unit weight of air (lbs):	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Ambient temperature (°F):	68.0	68.0	68.0	68.0	68.0	68.0	68.0	68.0	68.0
Vapor press. VOC (mm Hg):	311.5	101.9	59.0	12.7	1.28	177.21	21.80	93.74	42.27
Molecular weight of VOC:	84.9	133.4	131.4	165.8	150.0	58.08		32.04	46.07
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
(1) Partial pressure air =	448.5	658.1	701.0	747.3	758.7	582.8	738.2	666.3	717.7
(2) Mole fraction of air =	0.590	0.866	0.922	0.983	0.998	0.767	0.971	0.877	0.944
(3) Pound-moles of air =	0.034	0.034	0.034	0.034	0.034	0.034	0.034	0.034	0.034
(4) Pound-moles, total =	0.058	0.040	0.037	0.035	0.035	0.045	0.036	0.039	0.037
(5) Pound-moles of VOC =	0.024	0.005	0.003	0.001	0.000	0.010	0.001	0.005	0.002
(6) Pounds of VOC =	2.03	0.71	0.38	0.10	0.01	0.61	0.00	0.16	0.09
(7) VOC CONC. PPM (VOL.) =	409,922	134,050	77,609	16,743	1,688	233,176	28,678	123,347	55,622
(8) VOC CONC. PPM (WGT.) =	670,455	415,916	276,010	88,717	8,668	378,495	0	134,537	85,561



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Lynn Milanian</u>	Location: <u>Tampa</u>
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Lynn Milanian, Engineer
Tampa District Office

THROUGH: Victor San Agustin, Professional Engineer II
Bill Crawford, Engineer
Tampa District Office

Satish Kastury, Administrator
Bill Neimes, Professional Engineer II *see for*
Hazardous Waste Regulation

FROM: John E. Griffin, Engineer *JEG*
Hazardous Waste Regulation

DATE: July 31, 1991

SUBJECT: Safety-Kleen-Tampa FLD 980 847 271; Draft Permit HO29-158820

In the Newspaper Intent to Issue the Safety-Kleen address should be the local address in the heading. Also, on page 2 of the Newspaper Intent, add the federal draft permit set conditions for 40 CFR Part 264 Subpart AA/BB regulations.

Specific Condition Part I 5. Need 17-730.300(2) added after "Part 264.12(c)".

The wording in Specific Condition I 29 needs to be "in Subpart P" in place of "on page 27 and 28".

Specific Condition Part IV The permit needsto have a stormwater disposal procedure that is referenced in the application.

JEG/do

cc: Jim Scarbrough, EPA/Region IV

D. E. R.

AUG - 2 1991

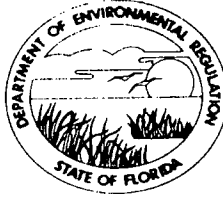
SOUTHWEST DISTRICT
TAMPA

6/9/91

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.
TAMPA, FLORIDA 33610-7347
813-623-5561
Suncom—552-7612



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
DR. RICHARD D. GARRITY
DISTRICT MANAGER

DATE: July 25, 1991

TIME: 10:10 a.m.

SUBJECT: Safety-Kleen Permit Application Revision

A T T E N D E E S

Name	Affiliation	Telephone
<u>L. M. Larian</u>	<u>FDER - Tampa - RERA</u>	<u>813-623-5561 X.389</u>
<u>Cindy Norton</u>	<u>ERM - Safety-Kleen</u>	<u>813-622-8727</u>
<u>V. M. Agustin</u>	<u>FDER - TPA - RERA</u>	<u>813-623-5561, ext. 390</u>
<u>W. C. Crawford</u>	<u>FDER - TPA - RERA</u>	<u>813-623-5561 ext 388</u>

TPA-02
06/81
/jdj

Meeting Agenda

July 25, 1991 10:00 a.m.

1. #699 Immersion Cleaner Pg. I.D.2-2

- Say is non-chlorinated, then state 1 percent total chlorinated solvents.

- Where is this waste being stored?

- Is there any TCLP analysis for this waste?

1.a. Table I.D.3-1 Pg. I.D.3-1A

- Why is #699 Immersion Cleaner listed as an "F" waste?

- Waste types for paint and industrial sections are different from original application as far as "F" listed waste, i.e.,
Paint waste was: F003 and F005
Industrial Waste was: F001, F002, F003 and F005 which did not include F004.
(compare with Table II.A.6-1 issue 6)

2. Is Safety-Kleen storing anti-freeze on-site now? (If so, where?)

3. Fig. II.A.1(a)-5

- Clarification as container storage is not authorized in the return fill station.

4. Pg. II.A.4(d)-7

- Last sentence says "western" side, should be eastern.

5. Pg. II.A.4(e)-10

- Item 1 says "measure volume of solvent in below ground tanks"

6. Table II.A.6-1

Pg II.A.6-2A

- Industrial solvents should be noted for D001, D006, D008 and F001, F002, F003, F005. F004 should not be listed.

- Paint wastes are presented as in original application.

7. Sprinkler System

Pg II.A.4(b)-14

- When will it be put into service?

8. Narrative detailing drum storage

Pg. II.K.1#2

- Indicate accumulation center has two areas but only provide dimensions for one.

- Explain which wastes will be stored where in the accumulation center.

9. Have the issues noted in the May 9, 1991 letter from Tera, Inc. been resolved?
10. Document 89-513-0 "Containment Assessment Above Ground Tanks" presented by Tera, Inc. dated May 31, 1989 states that the tank system must be certified immediately.

Then Tera certified letters dated May 9, 1991 and May 16, 1991 which addressed upgrades. Therefore, would appear that this tank system has not been certified.

11. Certification of return/fill area.
 - Table 1 has a list of drawings. Where are they located? Sheets 1 thru 8 appear to be in the next section, where are the remaining diagrams.
12. The containment calculation is not sealed (in the return/fill section) and seems to be missing the dumpster displacement in the north area as well as one additional dumpster displacement in the south area.

Also, show where the circular sumps are located. Would the sumps contribute to containment capacity? How many are there, what are their dimensions?

Conflicts noted on dumpster capacity:

Pg 1 (return/fill section)	says	504 gal.
Pg II.C.7-2-1	says	375 gal.
Pg II.C.12(a)-2	says	504 gal.

July 15, 1991

10:00 am THURSDAY July 25

Begin review of Safety-K revised application
Tampa Facility

~~note:~~ a completely revised document has been
furnished - however I intend to review only
those portions related to my working notice
which were also mentioned in the consent
order.

1 Find out if they intend to store spent #699
immersion cleaner ex-diff - is non-chlorinated
composed of naphtha, N-methyl-2-pyrrolidone, dipropylene
glycol, methyl ether, monoethanolamine and oleic
acid (if storing on-site, where?)
Any TCLP analysis for these waste?

2 in safety storing anti-freeze on-site now?
what did the TCLP analysis look like ^{→ have for metals?} ~~Do you have Safety~~
THINK TCLP metals will be present

Waste Table might need adjusting pg I.D. 3-1A
All actual codes not given, sub category TCLP
is given but initial "D" and "F" wastes
1a must be noted (way calling #699 F002 and F004)

3 Fig. II.A.1(a)-5 needs revision or clarification
as container storage is not authorized in the
return fill station

Chopura cost does not include closure to the ditch and ~~6071~~

Spec. cond. a. mt of release closure plan must be modified to address closure of pond & ditch plan^{county} ditch

per pond pg/section II.A.7-1 (not mentioned in closure section either)

4 typo on pg II.A.4(d)-7 - last sentence says "western" side - should be eastern

5 pg II.A.4(e)-10 item 1. says "measure volume of solvent in belowground tanks" what are you referring to.

OK pg II.A.5-7 in the last sentence missing from this P?

6 pg II.A.6-2A table - Industrial solvents does not give all waste codes and has F004 listed which should not be there.

<u>Container Location</u>	<u>Volume of containment</u>
IV. bldg capacity 5,197 gal	519.7 gal
3. bldg flammable area capacity 12,749 gal	1274.9 gal
3. bldg non-flammable area capacity 44,367	4436.7 gal

7 check on sprinkler sys is it hooked up yet w/ adequate pressure pg II.A.4(b)-14 facility does not have an active fire sprinkler system.

spout anti-freeze packaged in 30-gallon black steel drums

N. bldg 40' x 30' 6" wide by 4" high carrying
3 collector trunks)

o starting dry cleaner wastes, prevent immersion
cleaner and for auto freeze

S. bldg 50' x 100' 6" wide by 4" high carrying

8 indicate the dimensions of the 2nd storage
area and exactly which wastes
will be stored in each area and
was provided for the north bldg

no need 9 May 9, 1991 letter from Tuma, since 2 items of
to copy mark requiring correction - both the items have
been removed?

OK pg B-7 of Tuma report summary like lightness testing
not performed (same observation on pg B-9)

10 Document 89-513-0 "Continued Issues - Messgr Tanks"
No need to by Tuma dated May 31, 1989 copy certify
copy the tank type immediately
Tuma only cert. letter of May 16, 1991 and May 9, 1991

which only act upgraded not the systems itself.

retrofill shelter 50' x 80'

3 dumpsters each has max capacity of 504 gal

12 Certification statement provides a Table
with a list of drawings - where are these
drawings at? sheets 1 thru 8 are perhaps
in the next section but where are the remaining
ones? The containment calculation is not
sealed and appears to have not omitted the
 dumpster displacement in the N area as well as
one dumpster displacement in the S area? *

3 paper
clips

Also says on pg 1 dumpster capacity = 504 gal

Tank diked wall is 46.8"

containment is 15,30.5 gal

?

pg II C.7-2-1 says dumpster capacity is 375 gal

* this diagram is also on pg II C.7-16 - also could
you show where the circular sumps are in
the diagram? I don't believe their capacity
was utilized in the calculation - exactly how
many are there



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

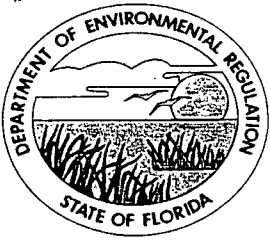
Interoffice Memorandum

TO: Satish Kastury
THRU: Victor San Agustin, P.E. *VSA*
Bill Crawford *W*
FROM: Lynne R. Milanian *Lynne 6/26*
DATE: *June 26, 1991*
SUBJECT: Safety-Kleen Corporation, FLD 980 847 271
Tampa Service Center, Draft Permit HO29-158820
Your Comments Requested

Attached is the draft permit prepared by the Southwest District. A major submittal has been received by the applicant, as yet it has not been reviewed. The information contained in the submittal will change numeric references in the draft permit i.e., perhaps 5 gallons to 7 gallons, etc. As such, your comments concerning the draft permit are being requested. Upon review of the recent submittal final adjustments will be made.

LRM/ab

6691



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

June 6, 1991

Fowler, White, Gillen Villareal
and Banker, P.A.
Post Office Box 11240
Tallahassee, Florida 32302

Attn: Ms. Pamela Garvin

Re: Safety Kleen Corp. - Hillsborough County
FLD 980 847 271
OGC Case No. 91-0047

Dear Ms. Garvin:

Attached is a revised Consent Order incorporating the changes you requested to paragraph #4 of the Order. Please refer the document for execution and return to me within 15 days.

Sincerely,

Elizabeth Knauss
Environmental Specialist III
Division of Waste Management

EK/br
Enclosure

cc: David Schwartz, OGC
Rhea F. Law, Esq.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

STATE OF FLORIDA DEPARTMENT	:	IN THE OFFICE OF THE
OF ENVIRONMENTAL REGULATION,	:	SOUTHWEST DISTRICT
	:	
Complainant,	:	
	:	
vs.	:	OGC CASE NO. <u>91-0047</u>
	:	
SAFETY KLEEN CORP.,	:	
	:	
<u>Respondent.</u>	:	

CONSENT ORDER

Pursuant to the provisions of Section 120.57(3), Florida Statutes and Florida Administrative Code Rule 17-103.110(3), this Consent Order is entered into between the State of Florida Department of Environmental Regulation ("Department") and Safety Kleen Corp. ("Respondent").

The Department finds the following:

1. The Department is the regulatory agency of the State of Florida having the responsibility and the authority to protect the air and water resources of the State, including groundwater, and to administer and enforce the Florida Air and Water Pollution Control Act, Chapter 403, Florida Statutes, and the regulations promulgated thereunder in Florida Administrative Code Title 17, specifically, for purposes of this Order, Chapter 403, Part IV, Florida Statutes, and Florida Administrative Code Chapter 17-730, which adopts portions of 40 Code of Federal Regulation (CFR) 260 through 266 regulating the disposal and proper management of Hazardous Waste. The Department has jurisdiction over the matters addressed in this Consent Order.

2. The Respondent is a foreign corporation registered with the Secretary of State to conduct business in the State of Florida, and is therefore a person within the meaning of Section 403.031(5), Florida Statutes. The Respondent owns and operates a hazardous waste storage facility. Respondent is by definition a generator of hazardous waste pursuant to Florida Administrative Code Chapter 17-730.

3. The Respondent currently has a facility on property ("the property") located at 5309 24th Avenue South, Tampa, Hillsborough County, Florida. Any reference herein to Safety Kleen Corp. facility or site shall mean the structures and property described in this paragraph. The Department contends that the Respondent has violated rules regarding hazardous waste management contained in Florida Administrative Code Chapter 17-730 as set forth in the "Summary of Violations" Section of Exhibit I.

4. Without any admission of liability on the part of Respondent the Department and the Respondent mutually agree to settle the matter in accordance with the terms and conditions set forth below, therefore, pursuant to Florida Administrative Code Rule 17-103.110, it is

ORDERED:

5. The Respondent shall submit a complete operating permit application on or before May 20, 1991. The permit application shall include tank and container storage capacities based upon measurement of current secondary containment capacities. The permit application shall also include a revised tank assessment, installation report and tightness test report certified by an

independent registered professional engineer. The permit application shall include revised, certified record drawings and a revised permit certification page, signed by Respondent and by a professional engineer registered to practice in the State of Florida.

6. If Respondent fails to submit the complete operating permit application specified in paragraph 5 of this Consent Order by May 20, 1991, Respondent shall immediately cease storing hazardous waste at the facility until the Department has issued a hazardous waste operating permit for the facility. For purposes of paragraphs 5 and 6 only, the term "complete operating permit application" means an operating permit application not suffering from one or more of the following deficiencies:

- A. One or more calculations, record drawings, hazardous waste storage tank assessments, installation inspection reports or tightness test reports which are not signed and sealed by an independent professional engineer registered to practice in the State of Florida;
- B. Record drawings which do not correspond to actual site construction.

7. Without admitting any liability for the alleged violations, the Respondent agrees to pay to the Department's "Pollution Recovery Fund" a civil penalty in the amount of \$30,500. Payment specifying the OGC Case Number 91-0047 shall be made by certified check, cashier's check, or money order to the "Florida Pollution Recovery Fund", within 10 days of the date of entry of this Order. Payment specifying the OGC Case Number shall

be sent via certified mail to 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

8. Respondent shall allow authorized representatives of the Department access to the property at reasonable times for purposes of determining compliance with this Order and the rules and regulations of the Department.

9. The Department hereby expressly reserves the right to initiate appropriate legal action to prevent or prohibit the future violation of applicable statutes, or the rules promulgated thereunder not covered by the terms of this Consent Order.

10. The Department for and in consideration of the complete and timely performance by Respondent of the obligations agreed to in this Consent Order, hereby waives its right to seek judicial imposition of damages, or civil or criminal penalties for alleged violations outlined in this Consent Order. Respondent waives its right to an administrative hearing on the terms of this Consent Order pursuant to Section 120.57, Florida Statutes. Respondent acknowledges its right to appeal this Consent Order pursuant to Section 120.68, Florida Statutes, but waives that right upon signing this Consent Order.

11. Entry of this Consent Order does not relieve Respondent of the need to comply with applicable federal, state or local laws, regulations, or ordinances.

12. The terms and conditions set forth in the Consent Order may be enforced in a court of competent jurisdiction pursuant to Sections 120.69 and 403.121, Florida Statutes. Failure to comply with terms of this Consent Order shall constitute a violation of Section 403.727, Florida Statutes.

13. Respondent is fully aware that a violation of the terms of this Consent Order may subject Respondent to judicial imposition of damages, civil penalties of up to \$50,000 per offense, and criminal penalties.

14. Persons not parties whose substantial interests are affected by this Consent Order have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399, within 21 days of receipt of this notice. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes.

15. The petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner; the Department's identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by petitioner, if any;
- (e) A statement of the material facts disputed by petitioner; if any;
- (e) A statement of acts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or

statutes petitioner contends require reversal or modification of the Department's action or proposed action; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency (proposed) action have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed.

16. No modification of the terms of this Consent Order shall be effective until reduced to writing and executed by both the Respondent and the Department.

17. This Consent Order is final agency action of the Department pursuant to Section 120.69, Florida Statutes, and Florida Administrative Code Rule 17-103.110(3), and it is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the preceding paragraph. Upon timely filing of a petition this Consent Order will not be effective until further order of the Department.

FOR THE RESPONDENT:

DATE

Scott F. Fore
Vice President
Environmental Health
and Safety
Safety Kleen Corp.

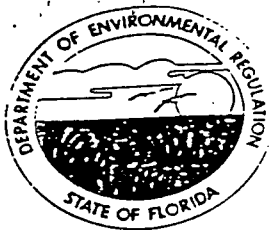
DATED AND ORDERED THIS _____ day of _____, 1991,
in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Copies furnished to:

Office of General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachmann, Secretary

RECEIVED
DEC 31 1990

HAZARDOUS WASTE INSPECTION REPORT

Dept. of Environmental Reg.
Office of General Counsel

1. INSPECTION REPORT COMPLAINT ROUTINE FOLLOW-UP X PERMITTING
INSPECTION

FACILITY NAME Safety Kleen Corp. DER/EPA ID FLD 980 847 271

ADDRESS Post Office Box 1045 - Brandon, Florida 34299-1045

COUNTY Hillsborough Phone(813) 621-5457 DATE 6/19/90 TIME 9:00 a.m.

TYPE OF FACILITY:

Generator	Storage	Treatment
<u>Small Quantity</u>	<u>X</u> Container	<u>Tank</u>
<u>X</u> Generator	<u>X</u> Tank	<u>Land Treatment</u>
	<u>Waste Pile</u>	<u>Thermal</u>
Transporter	<u>Surface Impoundment</u>	<u>Chem/Phys/Bio.</u>
<u>X</u> Transporter		<u>Incinerator</u>
	Disposal	<u>Surface Impdmt.</u>
	<u>Landfill</u>	
	<u>Surface Impoundment</u>	
	<u>Waste Pile</u>	

2. Applicable Regulations:

40 CFR 262 40 CFR 263 X 40 CFR 264 40 CFR 265

3. Responsible Official: (Name & Title)

Scott E. Fore, Vice President
Health and Safety

4. Survey Participants & Principal Inspector

Frank Taylor - Branch Manager
Jim Davis - Manager
Lynne Milanian - FDER
Bill Crawford - FDER

5. Facility Latitude:

27°55'21"

Longitude:

82°23'40"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

Application

7. Permit No.: H029-158820 Date Issued: N/A Exp. Date: N/A

8) SUMMARY OF FINDINGS for non-compliance items:

On June 19, 1990, the RCRA permitting staff conducted an inspection to verify completion of construction of the Safety-Kleen Tampa Service Center. After careful examination of the facility, in comparison with the application submitted, numerous discrepancies between the record drawings and actual site construction were noted.

North Building

1. Hazardous waste storage area described via calculations, diagrams and narrative to possess 2 containment trenches, thus able to support a storage capacity of 6,192 gallons of liquid hazardous waste.

Actual storage area has 1 containment trench, in field measurements were approximately 93 inches X 20.5 inches, therefore actual containment capacity is roughly 189 gallons. As such, permittable liquid hazardous waste storage capacity is only 1,890 gallons.

See attached Diagram I.

2. A grated manhole adjacent to the hazardous waste storage area and a floor drain at the base of the stair well were noted in the north building. It was originally believed that these 2 drainage systems tied into the city sewer system, however, facility contacts indicated that each system transfers any collected liquids to the on-site septic-system.

South Building

1. One available containment trench in this area was not presented on the diagram.

2. Two outlets from the building are provided in the event that the system's containment capacity is exceeded. Overflow will not directly proceed to the retention pond but will flow in a uncontrolled fashion down the parking lot to the drainage ditch to the pond. Excess run-off will cause backflow in the ditch which will enter a concrete spillway and flow off-site.

See attached Diagram II.

Solvent Return/Fill Area

1. Activities in this area include transfer of liquid hazardous wastes (spent mineral spirits), product dispensing (mineral Spirits) and drum washing. Diagrams, calculations and narrative submitted document 6 containment sumps and a larger concrete curb containment area than was actually present.

8) PROCESS DESCRIPTION: (Cont'd)

Actual containment provided included only 2 sumps and the area defined by concrete curbing was smaller - thus reducing available containment capacity. In-field measurements were not taken as it became evident that it would be necessary to re-survey the entire facility. Also sloping (to facilitate drainage to collection sumps and trenches) is questionable.

See attached Diagram III.

2. The three dumpsters receiving the hazardous waste for transfer to the storage tank were also storing a quantity of waste which contradicts the application which states that the dumpsters would not be utilized for storage. The three dumpsters are part of the ancillary equipment of the tank system and were not included in the facility's tank assessment.

The on-site inspection indicates the Safety-Kleen Tampa Service Center has not been constructed according to the application submitted, which was the basis for issuing the construction permit. Further, upon application for an operating permit, contradictory statements and false documents were submitted in an attempt to support issuance of same. As a result of this action, Safety Kleen has been found in violation of 40 CFR 264 and Florida Statute 403.727. The violations are noted in Section 9 of this report.

9) SUMMARY OF VIOLATIONS:

40 CFR 264.175(b)(3)

In the container storage area, containment system having sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater, has not been provided.

40 CFR 264.192(a)(1)

A written assessment, reviewed and certified by an independent professional engineer detailing the integrity of the tank system's ancillary equipment has not been submitted.

40 CFR 264.192(a)(5)⁷

Design considerations detailing the ancillary equipment have not been provided.

40 CFR 264.192(b)⁷

A report detailing proper installation of ancillary equipment was not submitted.

9) SUMMARY OF VIOLATIONS: (Cont'd)

40 CFR 264.192(d)?

A report establishing proper tightness was not submitted for the ancillary equipment.

40 CFR 264.192(g)

Written statements certifying the design of the entire tank system were not on file at the facility.

40 CFR 264.193(e)(1)(i)

Applicant originally stated that a containment volume of 1,120 gallons would be provided by four outer sumps. As the 4 outer sumps do not exist and the curbing present provides containment for a much smaller area, containment able to hold 100 percent of the capacity of the largest tank (dumpster) within the containment boundary may not have been constructed.

40 CFR 264.31

Facility has not been designed to minimize unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or waters which could threaten human health or the environment.

Section 403.727(1)(e), F.S.

Applicant has willingly submitted false documentation (i.e., calculations, diagrams and narrative) which was utilized to support the permit application.

Inspected: *Lynne Milanian*

Lynne Milanian
Permitting Engineer

Approved: *Elizabeth Knauss*

Elizabeth Knauss
Environmental Supervisor I

Date: *8/25/93*

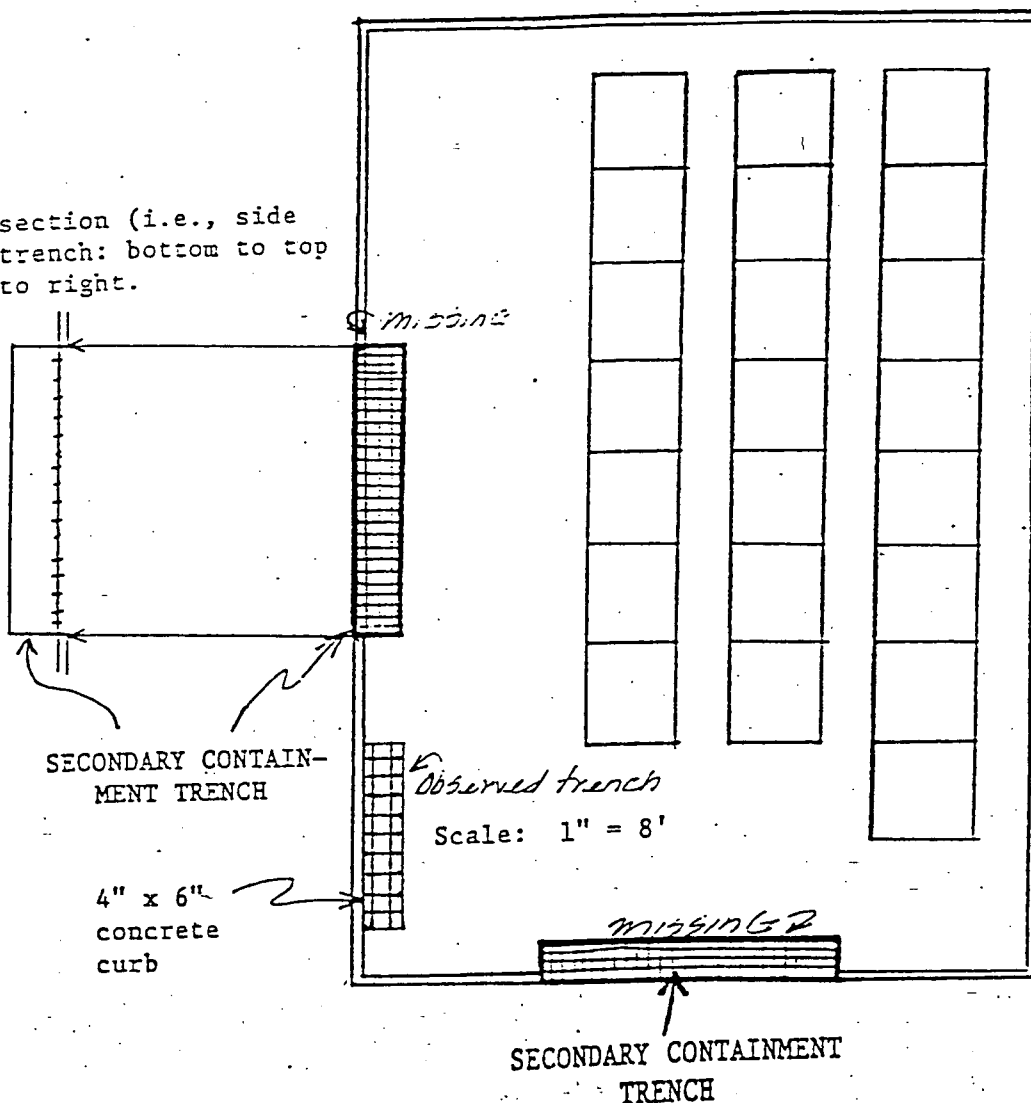
SAFETY-KLEEN CORPORATION

TAMPA, FLORIDA FACILITY

SECONDARY CONTAINMENT CALCULATIONS

North Building

This a cross-section (i.e., side view) of the trench: bottom to top is from left to right.



The secondary containment system is closed; no piping is associated with it. There is no slope to the floor. All containers will be stored on pallets.

Service Center Container Storage Area:

Two Trenches:

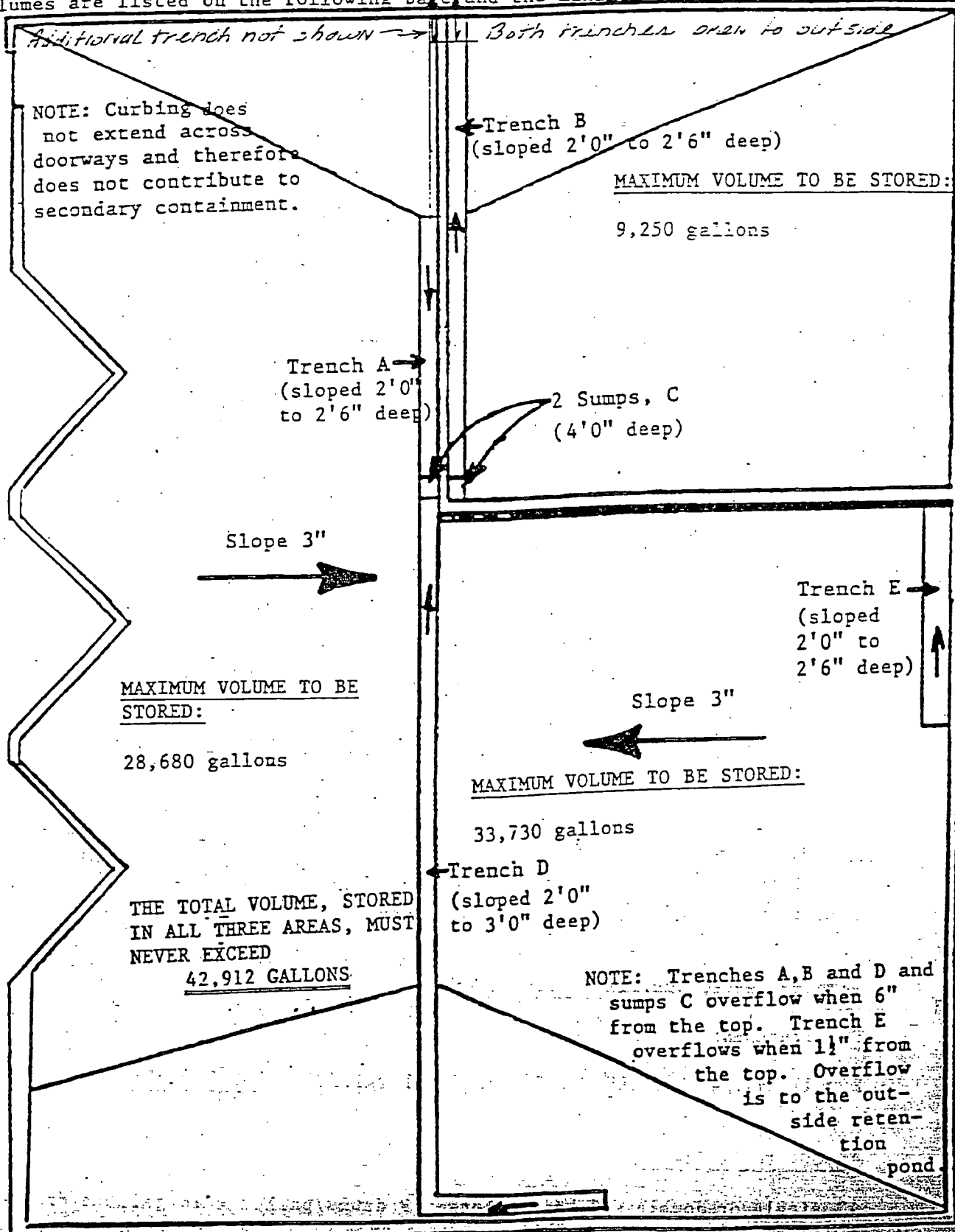
2 x 11' 9 1/4" L x 19" W x 2' D x 7.481 gal./cf = 623.7 gallons

Amount to Be Stored:

43 single or double stacked pallets x 9 drums/pallet x 16 gallons/drum = 6,192 gallons. While the volume of each type of waste stored may vary, the total volume stored will never exceed 6,912 gallons.

South Building
Scale: 1" = 12'

The trenches delineate three separate areas in this building. The square room in the upper right corner is designed to hold flammable material; flammable material may not be stored in any area but this room. The remaining two areas are actually one L-shaped room which may be used for the storage of any non-flammable material. The secondary containment volumes are listed on the following page, and the maximum volumes to be stored are shown below.



1" SOLVENT LINE TO USED SOLVENT STORAGE TANK (SEE SITE PLAN)

1" SOLVENT LINE TO FRESH STORAGE TANK (SEE SITE PLAN)

CONC. SLAB
(slab is sloped to center sump)

CONC. SLAB
(slab is sloped to center)
SOLVENT LINES TO BE SUPPORTED ON WALL TURNSTUITS OR EQUAL (TOTAL 0'-0" APART) SOLVENT LINE ELEVATION TO BE AT SAME HEIGHT AS FROM PIPE BRIDGE. SEE S-K DWG. P3

10" SUMP
MISSING

10" SUMP
MISSING

INSTALL DOCK PLATES 8 TOTAL (SUPPLIED BY S-K) CENTER BTWN. DOCK BUMPERS SEE S-K DWG. C10048 FOR DETAILS

CONTRACTOR TO SUPPLY & INSTALL STEEL STAIRS & HANDRAILS (4 PLCS)

NOTE:
ALL PIPE JOINT CONNECTION BEYOND THIS POINT (OUTSIDE CONTAINMENT AREA) ARE TO BE WELDED FOR DISTANCE BETW. CONTAINMENT AREA REFER TO SITE PL.

USE SAME

FLOAT SWITCH LOCATION SEE S-K DWG. D1118 0'-0" X 10'-0" OH. DOOR

PUMP FOR USED SOLVENT SEE S-K DWG. D1150 FOR PLUMBING. PUMP BASE PER S-K DWG. D1152 DETAIL 92

1000# B.P. RATED RAISED STL. DOCKS (10'-0" X 23'-0") 2 TOTAL - SEE S-K DWG. D1231 & D1232 C/T ENDS OF DOCK AS REQD. TO FIT SNUG BTWN. CONC. WALLS. (SUPPLIED BY S-K)

6" WIDE X 6" HIGH CONC. CURB CURB & SLAB IN RETURN & FILL AREA TO BE MONOLITHIC POURED-TROWEL SMOOTH

SOLVENT DISPENSER TREE. SEE S-K DWG. D11223 FOR DETAILS

15'-10" PUMPSTER

SUMP - PER S-K DWG. D11522 DETAIL C4

PUMPSTER

SOLVENT DISPENSER TREE

WET DUMPSTERS (SUPPLIED BY S-K) SEE S-K DWG. D10460 FOR REF.

2" DIA. FLEXIBLE HOSE. SEE S-K DWG. D10432 FOR INSTALLATION

SOLVENT DISPENSER TREE

SUMP - PER S-K DWG. D11522 SECTION C4

5' X 5' STL. TUBE DUMPER POSTS (CONC. FILLED) TYP. 16 PLCS

15'-10" PUMPSTER

SUMP - PER S-K DWG. D11522 DETAIL C4

SOLVENT DISPENSER TREE

2" BASKET STRAINER

2" DIA. FLEXIBLE HOSE. SEE S-K DWG. D10432 FOR INSTALLATION

CONTRACTOR TO FILL IN OPEN W/STEEL GRATING TO MATCH EXIST.

8" CONC. BLK. WALL (2 HR. FIRE RATED)

10" SUMP
MISSING

10" SUMP

12" CONC. BLK. WALL (2 HR. FIRE RATED)

10" SUMP
MISSING

CONC. SLAB

CONC. SLAB

Date 1-12-88
Inspector L. P. [illegible]
Generator EPA ID# 23-000-100-10

Tank Systems Checklist
(40 CFR Part 264, Subpart J - Tank Systems)

NOTE: If multiple tanks exist, list each tank and specify compliance or noncompliance on the facility's site plan. Indicate on site diagram which tanks are not in compliance. 1-15000 GAL HAZARDOUS TANK
3-375 GAL DUMPSTER TANKS

1. Are tanks presently used to accumulate waste? Yes ☒ No ☐
2. Are there any exempt tank systems present (Closed-loop Recycling System - 261.4(a)(8))? Yes ☐ No ☒
3. Assessment of existing tank systems integrity (265.191):
 - a. Number of existing tank systems without secondary containment (265.193) in operation, or for which installation commenced on or prior to July 14, 1986? 0
 - b. Number of existing tank systems without secondary containment (265.193) in operation, or for which installation commenced on or prior to the date the contained waste became hazardous (after 7/14/86)? 0
 - c. Are assessments on file for each of these tank systems (a & b)? Yes ☐ No ☒
NO assessment for the 3 dumpster tanks.
assessment for the 15000 GAL TANK provided
If yes, do the following apply:
 - (1) Assessment conducted by 1/12/88? Yes ☐ No ☒
REPORT SUBMITTED SINCE 9-1989 WITH SUBSEQUENT
ASSESSMENTS
 - (2) For wastes becoming hazardous after 7/14/86, was assessment on tank containing such waste conducted within 1 year after the date the waste became hazardous? N/A Yes ☐ No ☐
 - (3) Certification(s) by independent, qualified, and registered P.E.(s)? Yes ☒ No ☐
 - (4) Integrity assessment(s) results? 15000 GAL TANK IS A NEW TANK
INSTALLED IN 1985.
not leaking?
unfit for use? (See item #8)

Comments:

An assessment detailing the integrity of the 3 dumpster tanks which includes design considerations, proper installation, testing for tightness and secondary containment provisions must be submitted. Storage of hazardous waste is occurring in these 3 tanks.

4. New tank systems or components (265.192):

a. Number of new tank systems or components installed or put into use after 7/14/86? 0

b. Are assessments on file for each of the new tank systems or components? N/A Yes 0 No

If yes do the following apply:

(1) Assessment(s) certified by an independent, qualified, registered P.E.? 0 Yes 0 No

(2) Assessment(s) include the following information:

- Design standards (including secondary containment unless a variance-265.193(g)-has been received)? 0 Yes 0 No

- Factors affecting corrosion potential of tanks or components in which the external shell or any external metal component is in contact with soil or water (determined by a corrosion expert)? 0 Yes 0 No

- The type, and degree of external corrosion protection that is needed to ensure the integrity of the tank system(s) or components(s) described above (determined by a corrosion expert)? 0 Yes 0 No

- A determination of design or operational measures that will protect underground tank system components against potential damage from vehicular traffic? 0 Yes 0 No

- Design considerations to ensure that tank foundations will maintain the load of a full tank? 0 Yes 0 No

- Tank systems will be anchored to prevent flotation or dislodgement where it is placed in a saturated zone or is located within a seismic fault zone? 0 Yes 0 No

- Tank systems will withstand the effects of frost heave? 0 Yes 0 No

c. Are certification statements by a qualified installation inspector or qualified registered professional engineer on file to attest:

(1) to proper tank system or component installation, tank system tightness, and that necessary repairs were performed if needed? 0 Yes 0 No

- N/A
- (2) That backfill, used for underground tank systems or components, was made up of noncorrosive, porous and homogeneous materials that were placed properly around the system or component to ensure proper support? ☐ Yes ☐ No
- (3) That ancillary equipment has been supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? ☐ Yes ☐ No
- (4) That the type and degree of corrosion protection necessary was provided, based on the certified design assessment of the system? ☐ Yes ☐ No
- (5) That an independent corrosion expert ensured the proper installation of a corrosion protection system if it was field-fabricated? ☐ Yes ☐ No
- d. Has secondary containment been provided as required in 265.193 (see Item #6)? ☐ Yes ☐ No
- (1) Has a variance (265.193(g)) been obtained from secondary containment? ☐ Yes ☐ No

Comments:

5. Containment and detection of releases (265.193).

NOTE: Tank Systems storing hazardous waste which contains no free liquids and that are located within buildings with impermeable floors are exempt from these requirements (265.190(a)).

- a. How old are the existing tank systems? *4 to 5 years old* ☐
- (1) If not known, what is the age of the facility? ☐
- b. How many existing systems are being used to store or treat dioxin containing wastes: F020, F021, F022, F023, F026, and F027? *0* ☐
- TANKS ARE STORING SPIRIT MINERAL SPIRITS (DOOL, DOOG & DOOS)*
- c. Are there any existing tank systems which are used to store or treat materials which became hazardous wastes after 1/12/87? ☐ Yes ☒ No
- (1) How many? ☐
- d. Use the guidelines in 265.193(a)(1)-(5) to determine when secondary containment meeting the requirement of 265.193 is to be provided (use narrative explanation sheet if necessary). *N/A*
- IN ACCORDANCE WITH PERMIT MUST MEET 264.193*
- e. Have any variances (265.193(g)) from secondary containment been requested for existing tank systems? ☐ Yes ☒ No

HC24-118986 SPEC. TO CONDITION No. 1 secondary containment will meet requirements of 264.193

- f. Are leak tests meeting the requirements of 265.191(b)(5) conducted annually for non-enterable underground tanks without secondary containment?
- g. Are leak tests as described above, or internal inspections or other tank integrity examinations done by an independent, qualified, registered P.E. annually for all other types of tanks systems and ancillary equipment?
- h. Are records of the results of leak tests or other tank integrity assessments kept on file?
- i. Were any tank systems or components found to be leaking or unfit for use as a result of leak tests or other assessments?

NOTE: If the answer is yes, refer to item # 8 - Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (265.196).

Comments:

did not install this
issue

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No



6. Secondary containment systems (265.193(b)-(f)).

- a. Has secondary containment been provided for any tank system or component (see Items 4.d., 5.d., and 9.f.)?
provided for all 4 tanks
- b. If yes, has the containment system been:

☒ Yes ☐ No

- (1) Designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during its use?

☒ Yes ☐ No

- (2) Capable of detecting and collecting releases and accumulated liquids until the collected material is removed?

☒ Yes ☐ No

- c. To satisfy b., has the containment system been:

- (1) Constructed of or lined with materials that are compatible with the waste(s) to be contained?

☒ Yes ☐ No

(2) Provided with sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with waste it is exposed to, climatic conditions, the stress of installation, and the stress of daily operations including vehicular traffic?

☒ Yes ☐ No

(3) Placed on a foundation or base capable of providing support to the system, resistance to pressure gradients above and below, and protection against failure due to settlement, compression or uplift?

☒ Yes ☐ No

(4) Provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of waste or accumulated liquid into the secondary containment system within 24 hours or at the earliest practicable time based on existing leak detection technology and site conditions?

☒ Yes ☐ No

(5) Sloped or otherwise designed or operated to drain or remove liquids resulting from leaks, spills, or precipitation?

☒ Yes ☐ No

d. Which device below is used to provide secondary containment for tanks? (Check those that apply)

☒ (1) A liner (external to the tank).

☐ (2) A vault.

☐ (3) A double-walled tank.

☐ (4) An equivalent device approved by the Department.

e. If an external liner system is used, has it been:

(1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary? *15000 Gal tank* ☒ Yes ☐ No
3 dump tanks

(2) Designed or operated to prevent run-on or infiltration of precipitation into the system? *3 dump tanks* ☒ Yes ☐ No
15000 Gal tank

Note: If the containment collection system has *has containment for* sufficient excess capacity - able to contain *the 24 hr 25 yr* precipitation from a 25-year, 24-hour rainfall *storm* event - this feature is not necessary.

(3) Determined to be free of cracks and gaps?

☒ Yes ☐ No

(4) Designed and installed to completely surround the tank and to cover all surrounding earth to prevent lateral and vertical migration of waste?

☒ Yes ☐ No

f. If a vault system is used, has it been: *N/A*

(1) Designed or operated to contain 100% of the capacity of the largest tank within its boundary?

☐ Yes ☐ No

- (2) Designed or operated to prevent run-on or infiltration of precipitation into the system (see note above)? ☐ Yes ☐ No
- (3) Constructed with chemical-resistant water stops in place at all joints (if any)? ☐ Yes ☐ No
- (4) Provided with an impermeable interior coating or lining that is compatible with the accumulated waste to prevent migration into the concrete? ☐ Yes ☐ No
- (5) Provided with protection against the formation and ignition of vapors within the vault if the wastes being accumulated are ignitable or reactive? ☐ Yes ☐ No
- (6) Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault (if it is subject to hydraulic pressure)? ☐ Yes ☐ No

g. If double-walled tanks are used, are they? *N/A*

- (1) Designed as an integral structure so that the outer shell will contain releases from the inner tank? ☐ Yes ☐ No
- (2) Protected, if constructed of metal, from corrosion on the inner tank interior and outer shell exterior? ☐ Yes ☐ No
- (3) Provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time based on existing technology and site conditions? ☐ Yes ☐ No

Comments: *Diagram submitted detailing the 3 dumpster tanks showed a much larger containment area and 6 sumps. Actual area of containment was much smaller and only had 2 sumps.*

7. General operating requirements (265.194).

- a. Is there any evidence of ruptures, leaks, corrosion, or failure in the tank system or ancillary equipment? ☐ Yes ☒ No

NOTE: If the answer is yes, explain in the narrative report.

- b. Are appropriate controls and practices such as the following used to prevent spills and overflows from tanks or secondary containment systems:

- (1) Spill prevention controls (e.g. check valves, dry disconnect couplings, etc.)? ☒ Yes ☐ No

(2) Overfill prevention controls (e.g. level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)?

☒ Yes ☐ No

(3) Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave, wind action, or precipitation?

☒ Yes ☐ No

c. Have any leaks or spills occurred in a tank system or its ancillary equipment?

☐ Yes ☒ No

NONE OBSERVED

NOTE: If the answer is yes, explain what steps were taken in response to this situation in the narrative report (see item #8 - 265.196).

Comments:

8. Inspections (265.195).

did not disassemble nor use for inspection tools or records.

a. Does the owner/operator inspect the following, each operating day, where present:

(1) Overfill/spill control equipment (e.g. waste-feed cutoff systems, bypass systems, and drainage systems)?

☐ Yes ☐ No

(2) Aboveground portions of the tank system to detect corrosion or releases of waste?

☐ Yes ☐ No

(3) Data gathered from monitoring equipment and leak detection equipment (e.g. pressure and temperature gauges, monitoring wells)?

☐ Yes ☐ No

(4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g. dikes) to detect erosion or signs of releases of hazardous waste (e.g. wet spots, dead vegetation)?

☐ Yes ☐ No

b. Are cathodic protection systems, if present, inspected according to the following schedule:

(1) Six months to confirm the proper operation of the cathodic protection system after the initial installation, and annually thereafter?

☐ Yes ☐ No

(2) Every other month to inspect sources of impressed current?

☐ Yes ☐ No

☒

c. Are the inspection results documented in the operating record of the facility?

☐ Yes ☐ No

Comments:

9. Response to leaks or spills and disposition of leaking or unfit-for-use tank systems (265.196). *No reports of leaks or spills - all tanks are approximately 5 years old in-shall be replaced.*

a. If a tank or secondary containment system has a leak or a spill has occurred, was the system immediately removed from service and the flow of hazardous waste into the system immediately stopped?

☐ Yes ☐ No

(1) If the release was from the tank system, was as much of the waste as necessary removed within 24 hours or at the earliest practicable time after its detection to allow inspection and repair to be performed?

☐ Yes ☐ No

(2) If the release was to the secondary containment system, were all released materials removed within 24 hours or in as timely a manner as possible to prevent harm to human health and the environment?

☐ Yes ☐ No

b. If there was a visible release to the environment, was a visual inspection conducted by the owner/operator?

☐ Yes ☐ No

(1) Was further migration of the leak or spill to soils or surface water prevented?

☐ Yes ☐ No

(2) Was the visible contamination removed and properly disposed of?

☐ Yes ☐ No

c. Was the release to the environment reported to the Department within 24 hours of detection?

☐ Yes ☐ No

NOTE: A leak or spill of less than or equal to a quantity of one pound of hazardous waste and that is immediately contained and cleaned up is exempted from this requirement.

d. Was a report to the Department, as specified in 265.196(d)(3), submitted within 30 days for nonexempt releases?

☐ Yes ☐ No

e. If a leak was the cause of a release, was the system repaired before being returned to service?

☐ Yes ☐ No

- f. If the leak caused a release to the environment from a component of a tank system without secondary containment, was that component provided with secondary containment containment as specified in 265.193 before it was returned to service (see Item #6)?

Yes No

NOTE: If the leaking component is aboveground and can be inspected visually, secondary containment does not need to be provided after repair.

****: If a component was replaced in order to repair the system, the owner or operator must comply with the standards for new tank systems or components 265.192 & 265.193 (see item #4).

- g. Was a major repair performed to return the tank system back to service?

Yes No

- (1) If yes, was a certification of this major repair done by an independent, qualified, registered P.E. before the system was returned to service?

Yes No

- (2) Was this certification submitted to the department within 7 days after returning the system to service?

Yes No

Comments:

10. Closure and post-closure care (265.197).

N/A - just beginning to operate

- a. At closure of a tank system, did the owner/operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste?

Yes No

Comments:

11. Special requirements for ignitable or reactive wastes (265.198).

a. Are ignitable or reactive wastes placed in tanks?
Spent mineral spirits & its sludge

☒ Yes ☐ No

(1) If yes, are they treated, rendered, or mixed before or immediately after placement in the tank system so that:

☐ Yes ☐ No

- The resulting waste, mixture, or dissolved material no longer meet the definition of ignitable or reactive waste and 265.17(b) is complied with?

☐ Yes ☒ No

OR

- The waste is stored or treated in such a way that is protected from any material or conditions that may cause the waste to ignite or react?

☒ Yes ☐ No

NOTE: If yes, use narrative explanation sheet to describe separation and confinement procedures. If no, use narrative explanation sheet to describe sources of ignition or reaction.

OR

- The tank system is used solely for emergencies?

☐ Yes ☒ No

b. Are protective distances maintained between the tank accumulation areas and any public ways, streets, alleys, or adjoining property lines that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code?"

☒ Yes ☐ No

50 foot set back rule is observed.

Comments:

12. Special requirements for incompatible wastes (265.199).

N/A

- a. Is there evidence that incompatible wastes were in the same tank?

___ Yes ___ No

NOTE: If yes, use narrative explanation sheet to state the results (e.g. signs such as fire, toxic mists, heat generation, bulging containers, etc.) and whether 265.17(b) was complied with.

- b. If a waste is to be placed in a tank that previously held an incompatible waste or material, was that tank washed?

___ Yes ___ No

NOTE: If yes, describe the washing procedure on the narrative explanation sheet. If no, was 265.17(b) complied with?

Comments:

Date June 14 1990
Inspector L. M. L. M. L. M.
Facility ID# FL2902347271

TSO CONTAINERS CHECKLIST (264.170-264.178)

264 Permit Condition Containers not inspected on the containment

1. Are the containers in good condition?

 Yes No Date 5/5/90

2. Are the containers managed in accordance with the permit?

 Yes No Date

3. Is the number of containers equal to or below the max inventory for the permit?

 Yes No Date

4. Are the containers in the designated bays by waste type?

 Yes No Date

5. Is the waste stored in the specified container?

 Yes No Date

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?

 No Yes Date

Explain.

7. Is the secondary containment system functional and are free liquids removed and managed in accordance with the permit?

 Yes No Date

8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line?

 Yes No Date

9. Is there sufficient aisle space to allow unobstructed movement and inspection?

 Yes No Date

10. Specific Condition on Permit

Actual North building containment system Yes No Date

observed not as presented in diagram. Approx Yes No Date

of liquid material and liquid waste for exposed Yes No Date

available containment system. Located material about Yes No Date

10 meters from containment curb.
Actual South building containment system observed not as
presented in diagram. See attached report for details and
diagrams.

Date _____
Inspector _____
Facility ID# _____

TSD TANKS CHECKLIST
(Subpart J - Tanks, 264.190-.198)
264 _____ Permit Condition _____

NOTE: If multiple tanks exist, list each tank and specify compliance or non-compliance on a facility site plan.

- | | |
|--|----------------------------|
| 1. Has the shell thickness been checked? | ____ Yes ____ No ____ Date |
| 2. Does the facility inspect the tanks as required in the permit? | ____ Yes ____ No ____ Date |
| 3. Is there evidence of ruptures, leaks or corrosion of the tanks? | ____ No ____ Yes ____ Date |
| 4. Does the uncovered tanks have sufficient freeboard as required in the permit? | ____ Yes ____ No ____ Date |
| 5. Is the area managed to prevent fire, explosion or contamination of the environment? | ____ Yes ____ No ____ Date |

6. Specific conditions on Permit:

_____	____ Yes ____ No ____ Date
_____	____ Yes ____ No ____ Date
_____	____ Yes ____ No ____ Date
_____	____ Yes ____ No ____ Date



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: Victor San Agustin, P.E. *VSA*
FROM: Bill Crawford *BCC*
DATE: May 21, 1991
SUBJECT: Safety kleen Corp., FLD 980 847 271
Operating Permit Application HO29-158820
Revised Operating Permit

A. 6-C

Attached please find copies of the information submitted by ERM South for the Safety-Kleen Corporation in response to a Notice of Intent to Deny dated September 20, 1990.

Please incorporate this information into the application and consider May 21, 1991 as the new day "0".

BCC/ab
Attachment

cc: James H. Scarbrough, EPA Region IV

*document stored as
ATTACHMENT "6-A-1"*

ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 • Fax (813) 621-8504
8181 N. W. 36th Street, Suite 20 • Miami, Florida 33166 • (305) 591-3076
777 Yamato Road, Suite 130 • Boca Raton, Florida 33487 • (407) 241-1752

Reply To: Tampa Office

H029-158820

A, C-C

May 20, 1991

Project No. 13112.19, Task 10

D. E. R

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

MAY 20 1991

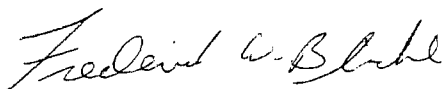
SOUTHWEST DISTRICT
TAMPA

RE: Safety-Kleen Corp. Tampa 54th Street--Operation Permit Application

Dear Mr. Crawford:

Enclosed are four certified copies of the above-referenced Permit Application. This Application was prepared for Safety-Kleen Corp. by Environmental Resources Management-South, Inc. (ERM). We trust this application will meet with your approval. If you have any questions or comments, please do not hesitate to contact me at (813/622-8727) or Ellen Jurczak at (708/697-8460, extension 2246).

Sincerely,



Frederick W. Blickle, P.E.
Project Manager

*document stored as
Attachment "b-A-1"*

FWB/bai/pjh

Enclosure(s)

cc: Joe Hartline - Safety-Kleen
Melissa Hlebasko - Safety-Kleen
Ellen Jurczak - Safety-Kleen

13112.19/01/WC052091.LTR/2



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*63
91*



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: Members, Permitting Technical Committee
Hazardous Waste Regulation

THROUGH: Bill Neimes, Professional Engineer II *W*
Hazardous Waste Regulation

FROM: Doug Outlaw, Professional Engineer I *DGO*
Hazardous Waste Regulation

DATE: March 6, 1991

SUBJECT: Safety Kleen Corporation, Regulatory Status of New
Barrel Washer Design

H029-158820

AI, 6-g

D.E.R.

MAR 22 1991

*SOUTHWEST DISTRICT
TAMPA*

ERM-South recently forwarded the attached copy of the design plans for the new barrel washer that will replace the wet dumpster at Safety Kleen facilities. Safety Kleen has already installed the new equipment at several facilities and will probably install the units at all remaining facilities. The permitting technical committee had discussed the designation of the wet dumpster during the last committee meeting prior to the December, 1991, PCE Conference.

Previously, the dumpster was considered to be tank system ancillary equipment. The committee had a change in designation of the dumpster from ancillary equipment to a separate storage tank under review due to the manner in which the dumpster was operated. Used mineral spirits remained in the dumpster above the bottom sludge layer after pumping the mineral spirits to the storage tank. The dumpster was completely emptied of mineral spirits only when sludges were removed at a frequency of approximately once a week. The new drum washer design incorporates a screen to retain sludges as the spent mineral spirits drain through the screen. The new design eliminates the plastic liner previously used with the spent mineral spirits drums.

I contacted the permitting technical committee members and all members concurred that the new drum washer should be incorporated into the permit for the storage tank system as ancillary equipment. The July 14, 1986, preamble to the revised tank regulations (40 CFR 264 Subpart J) states that "EPA's intention was and still is to include all ancillary equipment that is used in the handling of hazardous waste from its point of

6291

Memo to Members, Permitting Technical Committee

March 6, 1991

Page 2

generation *** to the hazardous waste storage/treatment tank(s) and, if applicable, from the hazardous waste storage treatment tank(s) *** to a point of shipment for disposal offsite".

As a part of the tank system, the drum washer is subject to the tank system requirements of Subpart J. If you have any questions, please call me at SUNCOM 278-0300.

DGO/do

cc: Jim Scarbrough, EPA/Region IV

ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 • Fax (813) 621-8504
8181 N. W. 36th Street, Suite 20 • Miami, Florida 33166 • (305) 591-3076
777 Yamato Road, Suite 130 • Boca Raton, Florida 33487 • (407) 241-1752

Reply To: Tampa Office

February 11, 1991

RECEIVED

FEB 12 1991

VIA FEDERAL EXPRESS

HAZARDOUS WASTE
PERMITTING

Project No. 13112.22, Task 10

Mr. Douglas Outlaw
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Safety-Kleen Corp. New Barrel Washer Design

Dear Mr. Outlaw:

At the request of Mr. Bob Snyder, Florida Department of Environmental Regulation (FDER), Orlando, I am forwarding you a copy of design plans for the new barrel washer that will replace the dumpster at Safety-Kleen Corp. facilities. Also, Mr. Snyder requested that we send you a copy of revised design information submitted to him concerning the Safety-Kleen Corp. Sanford, Florida construction permit application. These documents are produced by Safety-Kleen and I anticipate these can be transmitted to you by February 25, 1991.

Concerning the dumpster/barrel washer unit, it is my understanding that FDER is currently discussing classification of these units (tank or ancillary equipment) so a consistent policy can be established for all FDER districts. Based on my review of the definitions presented in 40 CFR 260.10 for ancillary equipment and tanks, it is my opinion that the barrel washer should be considered ancillary equipment since it serves as the initial point where used mineral spirits is directed through piping to the hazardous waste storage tank. Although the barrel washer does contain a small amount of used mineral spirits in the same manner that piping could contain small amounts of liquid, they are not really designed to contain an accumulation of hazardous waste; they are designed to be a "funnel" for transfer of used mineral spirits to the storage tank.

13112.22/TSK10/01/DO021191.LTR/1

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Mr. Douglas Outlaw
February 11, 1991
Page -2-

If you have any questions concerning this issue, please contact Ms. Ellen Jurczak or Ms. Melissa Hlebasko of Safety-Kleen (708/697-8460) or me.

Sincerely,



Frederick W. Blickle, P.E.
Project Manager

pjh/mm

Enclosure(s)

cc: Melissa Hlebasko - S-K, Elgin (ltr only)
Ellen Jurczak - S-K, Elgin (ltr only)
Cynthia Norton - ERM (ltr only)
Bob Snyder - FDER, Orlando (ltr only)



**BARREL WASHER DESCRIPTION AND
DESIGN PLANS**



BARREL WASHER DESCRIPTION

The barrel washers are located on the mineral spirits return and fill shelters. The drawings provide detailed information on the barrel washers.

Used solvent is returned from customers via drums and poured into the barrel washers. The barrel is then placed on the barrel washer roller brushes. As the machine is turned on, the barrel rotates on the brush cleaning the outside of the barrel. 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 machine is turned off and the barrel is removed. The procedure takes approximate five seconds per barrel.

The used solvent goes to a sump in the bottom of the machine and is automatically pumped to the used mineral spirits storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge drum for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by closing the lid of the unit.



ERM-South, inc.

9501 Princess Palm Avenue, Suite 100 • Tampa, Florida 33619 • (813) 622-8727 • Fax (813) 621-8504
8181 N. W. 36th Street, Suite 20 • Miami, Florida 33166 • (305) 591-3076
777 Yamato Road, Suite 130 • Boca Raton, Florida 33487 • (407) 241-1752

Reply To: Tampa Office

December 12, 1990

D. E. R.

Project Number 13112.19, Task 1

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

DEC 13 1990

SOUTHWEST DISTRICT
TAMPA

RE: Safety-Kleen Corp. -- 54th Street, Tampa, Florida Facility

Dear Ms. Milanian:

Environmental Resources Management-South, Inc. (ERM) on behalf of Safety-Kleen Corp. is requesting an extension to the December 12, 1990 submittal date for the revisions to the 54th Street, Tampa Part B Permit Application as requested in our telephone conversation on December 6, 1990. This delay is necessary in order to have the requested changes in containment finalized and underway prior to revision submittal. There are a few other issues concerning permitting information that we would like to discuss with you. After we discuss these issues, we will be able to identify a submittal date. I will contact you on December 13.

We appreciate your cooperation in this matter.

Sincerely,



Frederick W. Blickle, P.E.
Project Manager

chn:yec:cms

cc: Joe Hartline - SK-Norcross
Ellen Jurczak - SK-Elgin
Cynthia Norton - ERM

13112.19/01/TSK1/LM121290.LTR/1



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6/90



*Safety Kleen
Altamonte*

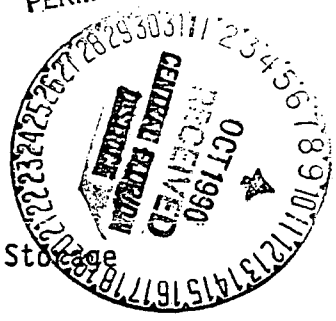
RECEIVED
SEP 27 1990

Certified Mail - Return Receipt Requested

September 24, 1990

Greer Tidwell
Regional Administrator
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

HAZARDOUS WASTE
PERMITTING



Subject: Addition of TC Waste Codes to Part B Permits for Storage Facilities

Orange Park, FL	FLD 980847214
Tallahassee, FL	FLD 000776773
TAMPA Delray Beach, FL	FLD 000776757 FLD 980 847 271
Miami, FL	FLD 980840086
Altamonte Springs, FL	FLD 097837983
Port Charlotte, FL	FLD 000776716

D.E.R.

DEC 17 1990

Dear Mr. Tidwell:

This letter is a request for Class I modifications to the subject permits in response to the Toxic Characteristic Leaching Procedure (TCLP) regulations which will take effect on September 25, 1990. This request has been prepared in accordance with 40 CFR 124.5(a) and 270.42(g) and is permitted under 40 CFR 270.41(a)(3).

SOUTHWEST DISTRICT
TAMPA

Safety-Kleen collects spent solvents from automotive, industrial and dry cleaning businesses, reclaims the used solvents and returns the reclaimed product to customers for reuse. The subject facilities are accumulation points for the spent solvents, prior to their shipment to a Safety-Kleen-owned reclamation facility at another location.

The facilities are currently permitted to store:

- 1) spent mineral spirits (D001, D006 and D008) in tanks (one tank per facility) and in containers;
- 2) spent immersion cleaner (F002 and F004) in containers;
- 3) dry cleaner wastes (F002 or D001) in containers and
- 4) paint wastes (F003, F005, D001, D006, D007 and D008) in containers.

Safety-Kleen will add the following TC Waste codes to the EPA waste codes listed above, for each waste stream: D004 through and including D011, D018, D019, D021 through and including D030 and D032 through and including D043. Safety-Kleen believes these contaminants may be present

60
90

Mr. Greer Tidwell
September 24, 1990
Page TWO

in any of the wastes currently permitted at the low levels stipulated under 40 CFR 261.24.

In addition to the waste streams which are included in the permit, two waste streams are being stored which are not considered hazardous at this time, but will be newly regulated wastes because they contain contaminants in excess of toxic characteristic (TC) levels: a new formula of the previously described immersion cleaner is stored in containers and spent antifreeze (ethylene glycol) is stored in a tank. Analytical results for these wastes are attached. Safety-Kleen believes the TC waste codes listed in the previous paragraph will also apply to these waste streams.

Please provide Safety-Kleen with copies of the mailing lists for the subject permits to enable us to comply with the requirements of 40 CFR 270.42(a)(ii).

In accordance with 40 CFR 270.42(g)(1)(iv), permit modification requests will be submitted within 180 days of the effective date of the regulations (March 23, 1991).

If you have any questions or require further information, please contact me on extension 2246.

Sincerely,



Ellen J. Jurczak, P.E.
Environmental Permits Manager

EJJ/dfh

cc: Florida DER
Florida Branch Managers (3-079-01, 3-079-02, 3-163-02,
3-097-01, 3-097-01, 3-130-01)

Mpls. Reg. Mgr.
J. Hartline



TEI ANALYTICAL, INC.

7177 NORTH AUSTIN • NILES, ILLINOIS • 60648 • 708/647-1346

August 7, 1990

LABORATORY REPORT

5075

CORRECTED REPORT

Page 1 of 2 pages

Safety-Kleen Corporation
O'Hare Technical Center
P.O. Box 29050
Elk Grove Village, IL 60007

P.O. # 76856

Attn: John Dingess/Dennis Brinkman

SAMPLE

RECEIVED: 05-30-90 1200

Waste Immersion Cleaner Sample

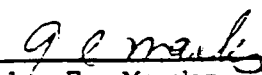
TEI NO. 74777

SAMPLE IDENTIFICATION: 188-31-1

<u>TEST</u>	<u>RESULT</u>	<u>DATE PERFORMED</u>
TCLP		06-05-90
Arsenic	LT 1 mg/1	06-07-90
Barium	3 mg/1	06-21-90
Cadmium	10 mg/1	06-21-90
Chromium	3 mg/1	06-21-90
Lead	42 mg/1	06-21-90
Mercury	LT 0.05 mg/1	06-12-90
Selenium	LT 1 mg/1	06-12-90
Silver	3 mg/1	06-21-90
Volatiles	See attached	06-12-90
Acid Extractables	See attached	06-13-90
Base Neutrals	See attached	06-13-90

LT = Less Than

This report may not be reproduced except in its entirety.


Gayle E. Marks, Ph.D.

**TEI ANALYTICAL, INC.**

7177 NORTH AUSTIN • NILES, ILLINOIS • 60648 • 708/647-1345

August 7, 1990

LABORATORY REPORT

5075

CORRECTED REPORT

Page 2 of 2 pages

Safety-Kleen Corporation

TCLP Volatiles, Base/Neutrals, Acid Extractables

All results expressed as ppm unless otherwise indicated.

LT = Less Than

This report may not be reproduced except in its entirety.

TEI-74777

188-31-1

Benzene	LT 1
Carbon Tetrachloride	LT 1
Chlorobenzene	220
Chloroform	LT 1
o Cresol	LT 50
m Cresol	LT 50
p Cresol	LT 50
Cresol	LT 50
1,4 Dichlorobenzene	1500.
1,2 Dichloroethane	LT 1
1,1 Dichloroethylene	LT 1
2,4 Dinitrotolene	LT 10
Hexachlorobenzene	LT 0.1
Hexachlorobutadiene	LT 10
Hexachloroethane	LT 10
Methyl Ethyl Ketone	LT 10
Nitrobenzene	LT 10
Pentachlorophenol	LT 10
Pyridine	LT 10
Tetrachloroethylene	320
Trichloroethylene	1.5
2,4,5 Trichlorophenol	LT 10
2,4,6 Trichlorophenol	LT 10
Vinyl Chloride	LT 1

Gayle E. Marks
Gayle E. Marks, Ph.D.

EXHIBIT 1 : (NOTIFIED EP TOXICITY DATA)

TEI ANALYTICAL, INC.

7177 NORTH AUSTIN • NILES, ILLINOIS • 60648 • 312/647-1345

September 5, 1989

LABORATORY REPORT

#3465

Safety-Kleen
O'Hare Technical Center
P. O. Box 92050
Elk Grove Village, IL 60009
Attn: Essy Kiany

P.O. 73870

SAMPLE
RECEIVED: 08-24-89 1635

TEI NO. 67458

SAMPLE IDENTIFICATION: SK-AF-COMP.

TEST	RESULT	THRESHOLD VALUE	DATE PERFORMED
EP Toxicity			08-28-89
Arsenic	<0.05	mg/l	08-30-89
Barium	<0.5	mg/l	08-30-89
Cadmium	<0.1	mg/l	08-30-89
Chromium	<0.5	mg/l	08-30-89
Lead	1.7	mg/l	08-30-89
Mercury	<0.1	mg/l	09-01-89
Selenium	<1	mg/l	09-01-89
Silver	<0.5	mg/l	08-30-89

Performed on Rush Basis

This report may not be reproduced except in its entirety.

G. E. Marks
Gayle E. Marks, Ph.D.

EXHIBIT (2) ANTIFREEZE TEST DATA

TEI ANALYTICAL, INC.

7177 NORTH AUSTIN • NILES, ILLINOIS • 60648 • 312/647-1345

November 29, 1989

LABORATORY REPORT

#3995

Page 1 of 2 pages

Safety-Kleen Corp
O'Hare Technical Center
P.O. Box 92050
Elk Grove Village, IL 60009
Attn: Essy Kiani

SAMPLE
RECEIVED: 10-26-89 1220

TEI NO. 70008

SAMPLE IDENTIFICATION: Crude Feed from 2nd Trial at C/R

TEST	RESULT		DATE PERFORMED
Arsenic	<0.05	mg/l	11-20-89
Barium	<2	mg/l	11-28-89
Cadmium	<1	mg/l	11-28-89
Chromium	<2	mg/l	11-28-89
Lead	<2	mg/l	11-28-89
Mercury	<0.002	mg/l	11-21-89
Selenium	<0.05	mg/l	11-21-89
Silver	<2	mg/l	11-28-89
			11-22-89
Base Neutrals (EPA 625)	see attached		11-17-89
Acid Extractables (625)	see attached		11-17-89
TCLP			11-15-89
Volatiles	see attached		11-22-89

NOTE: All tests performed on TCLP extract.

Scent Antifreeze

This report may not be reproduced except in its entirety.

Gayle E. Marks P.O.

TEI ANALYTICAL, INC.

7177 NORTH AUSTIN • NILES, ILLINOIS • 60648 • 312/647-1345

November 29, 1989

LABORATORY REPORT

#3995

Page 2 of 2 pages

Safety-Kleen Corporation

TCLP Organics

All results are expressed as ppm unless otherwise indicated.

LT = Less Than

This report may not be reproduced except in its entirety.

TEI-70008	
Crude Feed from 2nd Trial at C/R	
Acrylonitrile	LT 0.5
Benzene	2.5
Bis 2 Chloroethyl Ether	LT 0.05
Carbon Disulfide	LT 0.05
Carbon Tetrachloride	LT 0.05
Chlorobenzene	LT 0.05
Chloroform	LT 0.05
o-Cresol	LT 0.5
m-Cresol	LT 0.5
p-Cresol	LT 0.5
1,2 Dichlorobenzene	LT 0.5
1,4 Dichlorobenzene	LT 0.5
1,2 Dichloroethane	LT 0.05
1,1 Dichloroethylene	LT 0.05
2,4 Dinitrotoluene	LT 0.5
Hexachlorobenzene	LT 0.5
Hexachlorobutadiene	LT 0.5
Hexachloroethane	LT 0.5
Isobutanol	LT 0.5
Methylene Chloride	LT 0.05
Methyl Ethyl Ketone	LT 0.05
Nitrobenzene	LT 0.5
Pentachlorophenol	LT 0.5
Phenol	LT 0.5
Pyridine	100
1,1,2,2 Tetrachloroethane	LT 0.05
1,1,1,2 Tetrachloroethane	LT 0.05
Tetrachloroethylene	39
2,3,4,6 Tetrachlorophenol	LT 0.5
Toluene	9.5
1,1,1 Trichloroethane	0.15
1,1,2 Trichloroethane	LT 0.05
Trichloroethylene	0.11
2,4,5 Trichlorophenol	LT 0.5
2,4,6 Trichlorophenol	LT 0.5
Vinyl Chloride	LT 0.05

PERC



December 10, 1990
JWH 90-255

H029-158820

A, 6-c

Ms. Lorraine Clark
Florida Department of
Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400
Phone: (904) 488-0300

Re: Safety-Kleen Corp; Financial Assurance
Tampa/Manhattan Ave. Facility, FLD049557408
Del Ray Beach Facility, FLD000776757

Dear Ms. Clark:

Closure and contingent post-closure cost estimates for the above referenced facilities have been revised and adjusted to 1990 dollars as shown below:

<u>FACILITY</u>	<u>CLOSURE</u>	<u>CONTINGENCY</u> <u>POST-CLOSURE</u>
Tampa/Manhattan Ave.	\$225,000	\$710,000
<u>Del Ray Beach</u>	\$199,000	\$705,000

The total of these cost estimates is \$1,839,000.00. Therefore, Letter of Credit, number S235957 currently on file with your office, is to be amended to reflect the adjusted cost estimates. Enclosed is Amendment #3 which brings the credit up to the current amount required.

If you have any questions, please feel free to call me at
(404) 840-9828.

Sincerely, -

Joseph W. Hartline/pz

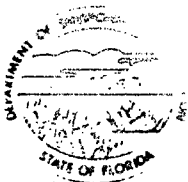
Joseph W. Hartline
JWH/pz

cc: Rick Peoples
T. Sands (3-097-01)
F. Taylor (3-163-01)

RECEIVED

DEC 12 1990
13

lga



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

TO: Satish Kastury
THRU: Victor San Agustin, P.E. *for WCC 11/21*
Bill Crawford *WCC*
FROM: Lynne R. Milanian *lynne 11/21*
DATE: November 21, 1990
SUBJECT: Safety-Kleen Corp., Tampa Service Center
FLD 980 847 271, Application No. HO29-158820
Proposed Warning Notice Mitigation

Attached please find documents submitted on November 8, 1990 by the referenced facility which are supplement to the subject application.

LRM/ab
Attachment

cc: James H. Scarbrough, EPA/Region IV

Pa

FOWLER, WHITE, GILLEN, BOGGS, VILLAREAL AND BANKER, P. A.

ATTORNEYS AT LAW

TAMPA — ST. PETERSBURG — CLEARWATER

FT. MYERS — TALLAHASSEE

CABLE - FOWHITE
TELEX 52776
TELECOPIER
(904) 681-6036

SUITE 910
101 NORTH MONROE STREET
TALLAHASSEE, FLORIDA 32301
(904) 681-0411

MAILING ADDRESS:
POST OFFICE BOX 11240
TALLAHASSEE, FLORIDA 32302

November 6, 1990

Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District
Florida Department of
Environmental Regulation
4520 Oakfair Boulevard
Tampa, Florida 33610-7347

D. E. R.

NOV 8 1990

SOUTHWEST DISTRICT
TAMPA

Re: Safety Kleen Corporation, Hillsborough County
Warning Notice No. WN90-0027HW29SWD
FLD #980 847 271

Dear Dr. Garrity:

The purpose of this letter is to explain and provide documentation to support Safety Kleen's position that the penalties assessed in the above-referenced Warning Notice in the amount of \$42,000.00, should be mitigated.

On October 16, 1990, representatives of Safety Kleen met with members of your staff in an effort to resolve the violations noted in the Warning Notice, and the issues raised in the Intent to Deny Safety Kleen's operation permit for its drum and tank storage hazardous waste units (DER File No. H029-158820) at its Tampa facility. At that meeting Safety Kleen fully acknowledged the discrepancies between the constructed facility and the facility design that was permitted in the construction permit issued by the Department.

The day prior to the meeting with your staff, representatives of Safety Kleen, Sherry Holland and Ellen Jurczak, and members of this firm visited the Tampa facility. Safety Kleen was dismayed when it discovered that the facility had not been constructed in accordance with the approved plans. Safety Kleen had been proceeding under the assumption that the facility had been constructed in strict conformance with the design and specifications of the construction permit, and was completely unaware that the contractor hired for this facility had deviated from the permit specifications in any respect.

Dr. Richard Garritty
November 6, 1990
Page 2

At the time the permit application was submitted, Safety Kleen had contracted with GAS to prepare and certify all of the required drawings and assessments. Safety Kleen provided GAS with copies of the Notices of Deficiency from the Department and copies of Safety Kleen's responses. The attached copies of correspondence from Safety Kleen to DER demonstrate how GAS was kept informed of the NODs from DER and the need to respond promptly. (The names highlighted are persons associated with GAS.) (Exhibit A) During this time, Safety Kleen's method of operation was to send GAS copies of the NODs and the responses, and to provide GAS with handwritten notes designating the items that GAS was to respond to. As you can see on the attached May and June, 1990 "Monthly Status Report for Safety-Kleen Projects," GAS indicated that it was certifying the drawings for the Tampa facility. These status reports were generated by GAS and provided to Safety Kleen. (Exhibit B) At all times GAS was kept abreast of the status of the application and of its need to respond promptly and accurately to DER's requests, and at all times in this process Safety Kleen believed that the matter was being handled properly by GAS. Upon becoming aware of the problems at this facility, as detailed in the Warning Notice and in the Intent to Deny, Safety Kleen dismissed GAS and retained the services of ERM South. Safety Kleen has contracted with ERM South to certify the required as-built drawings and revise the permit application as necessary. ERM South will also prepare the necessary assessments of the tank system's ancillary equipment.

At the meeting on October 16, 1990, Safety Kleen agreed to the recommendations made by your staff to rectify the situation, and Safety Kleen is taking immediate steps to remedy the violations at the Tampa facility. Such steps include: addressing the issue of secondary containment in the service center; plugging all drains and sewers in the service center; addressing secondary containment in the accumulation center; improving the drainage situation on the entire site; extending the roof over the return and fill station to prevent rain water from entering the secondary containment; adding curbing in the area where the trucks unload; and providing all required tank assessments and certified drawings.

While Safety Kleen accepts full responsibility for the situation at the facility, the violations are not the result of any willful action or willful inaction on the part of Safety Kleen. Safety Kleen presumed that its contractor and consultants were strictly complying with its instructions and the permit designs and regulatory requirements of the Department. As discussed above, since the problems were brought to its attention Safety Kleen has taken immediate action to address these issues.

Dr. Richard Garrity
November 6, 1990
Page 3

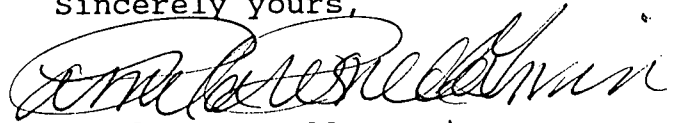
For the above reasons, Safety Kleen proposes that the recommended penalties be reduced to \$19,500.00, with the following breakdown:

- | | | |
|----|--|-------------|
| 1. | 403.727 - moderate/moderate | \$ 6,500.00 |
| 2. | 40 CFR Subpart J - moderate/moderate | \$ 6,500.00 |
| 3. | 264.175(b)(3) - moderate/moderate | \$ 6,500.00 |
| 4. | 264.31 - Safety Kleen believes that this should not be treated as a violation. As explained at the meeting, this design is in accordance with the requirements of the Fire Department. The design will only allow excess liquid to exit the building in the event of an emergency requiring use of the sprinkler system. If this occurs, Safety Kleen will treat the entire occurrence as a "spill" and will remediate the entire site in accordance with the regulations. | |

TOTAL: \$19,500.00

Thank you for your consideration of this matter.

Sincerely yours,


Pamela Presnell Garvin

Enclosures

PPG:cab

cc: Clabe Polk
Beth Knauss ✓
Lynne Milanian
Sherry Holland, Safety Kleen

MAY 1990
MONTHLY STATUS REPORT FOR SAFETY-KLEEN PROJECTS

Date April 30, 1990

Project Type	GAS Job No.	Branch Location	Activities This Month	Activities Remaining	Expected Completion	Due Date
	907709	Auburn, WA	Preconstruction Assess	Write Report	5/30/90	5/30/90
	907701	Rancho Cordova, CA	Preconstruction Assess	Write Report	5/30/90	5/30/90
	907702	Pasco, WA	Preconstruction Assess	Certify construction when complete	5/30/90	5/30/90
	907707	Spokane, WA	Preconstruction Assess	Write Report/Seismic Study	5/30/90	5/30/90
	907708	Eagan, MN	None	Post Construction Assess		
	907710	Lynwood, WA	Preconstruction Assess	Write Report/Seismic Study	5/30/90	5/30/90
	907714	La Crosse, WI	Postconstruction Assess	Write Report	5/30/90	5/30/90
	907715	Madison, WI	Postconstruction Assess	Write Report	5/30/90	5/30/90
	891774	Vincentown, NJ	Preconstruction Assess-Waste oil	Write Report	5/4/90	5/4/90
	907737	Tampa, Fla	Certify Drawings	Write Report	5/15/90	5/15/90
	907736	San Diego	Preconstruction Assess	Write Report	5/30/90	5/30/90
	907735	Mattydale, NY	Preconstruction Assess	Write Report	5/30/90	5/30/90

RECEIVED
OCT 17 1990
LEGAL DEPARTMENT
SAFETY-KLEEN CORP.

Exhibit "A"

June 1990
MONTHLY STATUS REPORT FOR SAFETY-KLEEN PROJECTS

Date June 5, 1990

Project Type	GAS Job No.	Branch Location	Activities This Month	Activities Remaining	Expected Completion	Due Date
Pl. B NOD	907740	Knoxville, TN	Response to NOD	Revise Part B	ASAP	
	907729	Mason, MI	Response to NOD			
	907722	Oakland, CA	Respond to NOD	Write Report/Seismic Study		Unknown
	891780	Boise, ID	Preconstruction Assess & Investigation	Write Report	6/15/90	6/15/90
	891783	Pekin ILL	Respond to NOD	Write Report		Unknown
	891784	Caseyville, ILL	Respond to NOD	Write Report		Unknown
	891785	Urbana ILL	None			
	891765	Franklin Park, ILL	Respond to NOD	Dumpster Assess	ASAP	
	907711	Medley, FL	Part B Certification	Certify Part B	6/15/90	6/15/90
	907730	Sanford, FL	Part B Certification	Certify Part B	6/15/90	6/15/90
	907731	Amarillo, TX	Plat map-Land Owners,Field Description	Write Report	6/30/90	6/30/90
Existing Tank Assess	907724	Vinton, VA	Existing Assess	P.E. Certification	6/15/90	6/15/90
	907725	Chesapeake, VA	Existing Assess	P.E. Certification	6/15/90	6/15/90
	907726	Bristol, VA	Existing Assess	P.E. Certification	6/15/90	6/31/90
	907741	Baltimore, MD	Existing Assess	Visit Site(s)	6/30/90	7/15/90
Preconstruction Tank Assess	907723	Rohnert Park, CA	None	Certify construction when complete	7/15/90	7/15/90
	891703	Oakland, CA	None	Certify construction when complete		
	891755	Springfield, OR	None	Certify construction when complete		
	891756	El Monte, CA	None	Certify construction when complete		
	891778	Albuquerque, NM	None	Certify construction when complete		

NOV 1 1990 14:12 FROM SK-ENVIRONMENTAL DEPT

PAGE.002

Date June 5, 1990

June 1990
MONTHLY STATUS REPORT FOR SAFETY-KLEEN PROJECTS

Project Type	GAS Job No.	Branch Location	Activities This Month	Activities Remaining	Expected Completion	Due Date
	907709	Auburn, WA	Preconstruction Assess	Write Report	6/30/90	6/30/90
	907701	Rancho Cordova, CA	Preconstruction Assess	Write Report	6/30/90	6/30/90
	907702	Pasco, WA	Preconstruction Assess	Certify construction when complete	6/15/90	6/15/90
	907707	Spokane, WA	Preconstruction Assess	Write Report/Seismic Study	6/30/90	6/30/90
	907710	Lynnwood, WA	Preconstruction Assess	Write Report/Seismic Study	6/15/90	6/15/90
	907714	La Crosse, WI	Postconstruction Assess	Write Report	6/30/90	6/30/90
	907715	Madison, WI	Postconstruction Assess	Write Report	6/30/90	6/30/90
	907737	Tampa, FLA	Certify Drawings	Write Report	6/15/90	6/15/90
	907736	San Diego, CA	Preconstruction Assess	Write Report	6/15/90	6/15/90
	907735	Mattysdale, NY	Preconstruction Assess	Write Report	6/30/90	6/30/90
	907738	Columbus, GA	Preconstruction Assess	P.E. Certification	6/15/90	6/15/90
	907708	Eagan, MN	None	Post Construction Assess		

NOV 1 '90 14:12 FROM SK ENVIRONMENTAL DEPT



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 25, 1990

Mr. Lynne R. Milanian
Permitting Engineer
Florida Dept. of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

SUBJECT: Tampa Facility
File No. H029-158820

Dear Mr. Milanian:

This has been prepared in response to your letter of March 26, 1990.
With reference to the numbered comments in your attachment, the
following information is offered:

1. The item to the left of the container storage area is a cross-section of the trench (i.e., from bottom to top going from left to right). It has been relabeled and is enclosed. Because this area is enclosed, no precipitation will enter it. Information on spill clean up measures has been added to Section 11.
2. Page 1F1-2 has been revised to include information on the number of dumpsters, the purpose of the outer sumps and secondary containment calculations. These sumps are coated and are included in the closure plan (they are considered part of the return and fill station).
3. Additional information has been added to Section 111 and Exhibit 105-2b: The typographical error has been corrected, the purposes three areas have been explained and the capacity has been clarified.
4. Clean stormwater is currently being discharged from the tankfarm dike. Please note that by July of 1991, all operators of hazardous waste management facilities will be required to obtain NPDES permits (see 53 FR 49416).
5. The diagrams from the last submittal have been sent to a professional engineer registered in Florida for his certification. They will be sent to your office immediately upon receipt.

Page 2

Please contact me on extension 2246 if you have any questions or require further information.

Sincerely,

Eileen J. Jozak
Permit Manager

EJJ/pz

cc: F. Stockbarger, Tampa Reg. Mgr.
J. Zink
Tampa A.C. Manager
Tampa S.C. Manager
J. Hartline
G. Carneau

Part 3 file
Tampa



Florida Department of Environmental Regulation

Southwest District • 4529 Oak Park Boulevard • Tampa, Florida 33610 7547 • 813-623-5501

BUD MARTINEZ, Governor

DALE THOMPSON, Secretary

JOHN SHEWEE, Assistant Secretary

DR. RICHARD GUNTER, Deputy Assistant Secretary

Ms. Ellen J. Jurczak, P.E.
Environmental Permits Manager
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

Re: Application for Hazardous Waste
Operating Permit
File No. H029-158820, FLD 980 847 271
Tampa, Florida Storage Facility
Third Notice of Deficiency

FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dear Ms. Jurczak:

The Department has performed a review of the package dated February 9, 1990 which provided much useful information concerning the above referenced application, your timely submission was appreciated.

In accordance with Section 17-4.055, Florida Administrative Code, (FAC), I am requesting further clarification of the items presented in the attachment. The response made by Safety-Kleen to each item shall be as noted in Section 17-730.220(5), FAC which details the certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper or lower right-hand margin) and the response must be labelled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Ms. Ellen J. Jurczak, P.E.
Safety-Kleen Corporation

Page Two

Please present your written response within 30 days of receipt of this notice and provide a copy to the Tallahassee office of FDER and the Atlanta office of EPA. Should you require more than 30 days to prepare this information, you shall notify each office and state the cause of delay and your anticipated submission date. Do not hesitate to contact me at 813/623-5561, extension 389, to discuss the contents of this letter, should you have any questions.

Sincerely,

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

LRM/ab
Attachments

cc: Satish Kastury - DER Tallahassee
Department of Environmental Regulation
Hazardous Waste Section (RCRA)
2600 Blair Stone Road
Tallahassee, Florida 32399

James Scarbrough, P.E. - USEPA
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Attachment

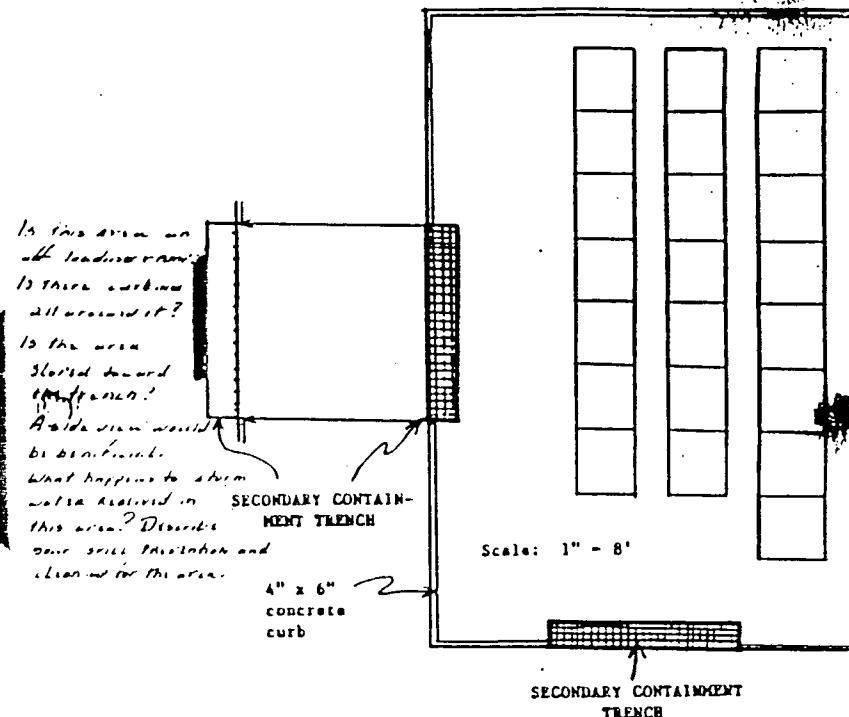
1. Indicate what the small block to the left of the larger block is on Diagram I.D.5-2a. Diagram enclosed with notes for clarification.
2. Concerning the recently submitted Dock Plan diagram, clarification is requested. On page IF1-2, narrative indicates two 10' X 25' stations each containing one wet dumpster existing in the dock area. The diagram, however, details 6 sumps, 3 dumpsters and 1 unknown grate area. Capacities are requested for the sumps and dumpsters. What purposes do the "outer" four sumps serve and what activity is occurring in these four areas? Is the floor in the dumpster area sloped towards the dumpsters? Provide secondary containment calculations for these areas as appropriate. Indicate if the dock and surrounding area has the same resin coating as provided in the storage areas. Also, have provisions been established for closure procedures for all the sumps in this area?
3. Diagram I.D.5-2b page 2 of 3 still has a typo in the note located in the upper left hand corner. If curbing does not contribute to secondary containment, the note should state, "curbing does not extend across doorways...". Also, the diagram portrays three distinct areas - are only certain wastes to be stored in only one of the three areas. What is the purpose of the three separate areas?

I perceived from your last submittal that you desire to store each of the 5 waste types (dumpster mud, spent immersion cleaner, paint waste, dry cleaner waste, and industrial solvents) in either of the two drum storage areas. Amount of each specific waste, its container and its location cannot be estimated in advance except that total storage capacities would not be exceeded. Is this a correct interpretation of Safety's storage plan? If so, then once again why are there 3 separate areas in the accumulation center?
4. You indicated that stormwater accumulating within the diked tank farm area exhibiting a "sheen" would be properly disposed. What occurs to incidental stormwater contained within the diked area, i.e. non-contaminated?
5. The diagrams and calculations contained in the last submittal were not signed and sealed by a P.E. licensed in the State of Florida and as such cannot be incorporated into the permit application.

SAFETY-KLEEN CORPORATION

TAMPA, FLORIDA FACILITY

SECONDARY CONTAINMENT CALCULATIONS



The secondary containment system is closed; no piping is associated with it. There is no slope to the floor. All containers will be stored on pallets.

Service Center Container Storage Area:

Two Trenches:

2 x 11' 9 1/4" L x 19" W x 2' D x 7.481 gal./cf = 623.7 gallons

Amount to Be Stored:

43 single or double stacked pallets x 9 drums/pallet x 16 gallons/drum = 6,192 gallons. While the volume of each type of waste stored may vary, the total volume stored will never exceed 6,912 gallons.



Certified Mail - Return Receipt Requested

February 9, 1990
LJJ 90-141

Ms. Lynne Milanian
Permitting Engineer
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Subject: Tampa Facility
H029-158820

Dear Ms. Milanian,

This has been prepared in response to your letter of December 27, 1989. You will find enclosed responses to your comments, revised pages for the text and revised exhibits.

Please contact me on extension 2246 if you have any questions or require further information.

Sincerely,

Ellen J. Kurczak, P.E.
Environmental Permits Manager

LJJ/dfs

cc: FDER, Tallahassee
U.S. EPA, Reg. IV
F. Stockbarger, Tampa Reg. Mgr.
J. Zink
J. Davis, A.C. Mgr.
F. Taylor, Br. Mgr.
Reg. Engr.
J. Chudzik

SAFETY-KLEEN CORPORATION
TAMPA, FLORIDA FACILITY
RESPONSES TO COMMENTS RECEIVED DECEMBER 27, 1989

Comment (from cover letter):

Each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper or lower right-hand margin) and the response must be labelled and numbered such that it can be placed in the appropriate section of the submitted application. This will necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Response:

The revised pages have been marked as requested. In addition, a new table of contents is enclosed.

Comment 1.A:

Item B-4 270.13(1) CFR, Topographic Map. Indicate when this information will be submitted, provide your best estimate.

Response:

Safety-Kleen has received information on the wells in the area and it is enclosed. Please note the locations of the wells are not exact (the township, range and section are the only references) so they were not added to the topographic map. However, they are organized according to the square mile section in which they are located.

Comment 11.A.1:

Item 4.a 270.14(b)(2)(ii) and (c) CFR, Facility Security. I could not locate the posting of required signs on Exhibits 1.D.5-1 and 2. Highlighting this information on your exhibit might be advisable.

Response:

The sign locations have been indicated on the enclosed site plan. Please note the enclosed site plan includes a topographic survey of the facility.

Comment 11.A.2:

Item 6 270.14(b)(2) and 264.13 CFR, Waste Analysis Plan. You have provided a heavy metal analysis for your waste paint thinner, I wanted to know what type of heavy metal analysis has been provided for the waste paint itself.

Response:

The paint waste and waste paint thinner are the same waste stream. The analytical results have been relabeled to indicate this.

Comment 11.A.3:

Item 4.d 264.32 and 270.14(b)(6) CFR, Preparedness and Prevention. I cannot locate the position of your emergency equipment, please highlight each item on your diagram.

Response:

The emergency equipment locations are indicated on the enclosed site plan.

Comment 11.B.1:

Diagrams that are clear and readable are requested for the following areas:

- a. Service center floor, detail all sumps, trenches, piping, etc. Also note any secondary containment provisions along with slope.
- b. Dock plan - return and fill area, detail all sumps, trenches, piping, etc. Also note any secondary containment provisions along with slopes.
- c. Dumpsters and associated equipment and any secondary containment provisions along with slopes.
- d. Exactly where each waste type will be stored.
- e. Complete waste movement, i.e., show exactly where wastes are received from the small pick-up vehicles, off-loaded, temporarily stored, transferred, transported, comingled, placed in dumpster or tank, final storage, readied for off-site disposal, removed off-site by semi-truck and/or tanker. A breakdown of time spent at each point is also requested.

Response:

- a.-c. These drawings are enclosed.
- d. While the total amounts of wastes stored in the two container storage areas will not exceed the permitted volumes, the amounts of each waste stream stored may vary. This is due to transportation and inventory control logistics; that is, the spent immersion cleaner could be the only waste stored on a given day and the dry

cleaner waste be the only waste stored on another day. Because the wastes are compatible with one another, Safety-Kleen does not believe this poses a problem. This information has been added to the floor plans for the storage areas.

- e. This information has been added to a copy of the site plan.

Comment 11.B.2:

I believe there is a typo on diagram 1.D.5-2b (2/2) concerning the note in the upper left corner, please clarify. You state in the note on the lower right corner that overflow from the trenches in the accumulation center will proceed to the retention pond. This statement requires the following explanations.

- a. All associated piping must be clearly detailed from the trenches and sumps in the accumulation center to the pond.
- b. Do any other overflow pipes from any where within the entire facility proceed to the pond? If so, detail in diagram.
- c. Does this pond primarily receive stormwater? Detail property drainage, gutters and yard drains conveying stormwaters to the pond.
- d. The Department advises Safety to consider another alternative other than allowing overflow releases to the pond. If you desire this arrangement it will be necessary to provide two further pieces of information. 1. Provisions for closure of this pond complete with demonstration that contamination has not occurred. 2. Provisions for collecting wastewaters during decontamination of all areas tied, via overflow pipes to the pond, when closure of the facility occurs.

Response:

- a. The flow from the accumulation center to the pond has been marked on the site plan. You should note there is no piping associated with overflow drainage to the pond. It will only occur during an emergency situation when the sprinkler system is triggered.
- b. The pond will collect rainwater runoff and overflow from the accumulation center only.
- c. The topography of the property is indicated on the site plan. No gutters or drains are associated with the drainage pond.
- d. 1. Safety-Kleen believes closure of the pond will be necessary only after an emergency necessitating the use of the sprinkler system has occurred. This pond is not intended to supplement the existing secondary containment system. Safety-Kleen will sample the water and soil of the pond during closure to insure its cleanliness but, unless an overflow from the storage area to the

pond has occurred, Safety-Kleen does not believe the pond should be subject to closure requirements any more than any other part of the facility which might be subject to spills or fire fighting water overflow. You should note that an emergency of the magnitude-necessary to cause the secondary containment in the warehouse to overflow (i.e., a fire) would, in turn, necessitate a remedial action and clean up. These would commence immediately after the emergency event. This information has been added to the contingency plan in section I.F.2.f.

2. Clean up of the facility will not cause drainage to the pond. This information has been added to the closure plan in Section I.F.1.c.1.d.

Comment II.B.3:

In order to observe the 50 feet setback rule it would appear that you will not be able to utilize at least the last 10 feet of the south wall of the accumulation center. How will you achieve this, or what steps will be taken to ensure that ignitable wastes will not be placed in this zone?

Response:

The enclosed property survey (which is more recent than the site plan used for exhibit I.D.5-1) indicates the accumulation center is 50 feet from the south property line. A new site plan, which supercedes the exhibit currently in the application, is enclosed.

Comment II.C:

1. I did not receive a revised GAS Association letter concerning tank capability for incorporation into the application.
2. I did not receive diagram D 12801 which is referenced in the GAS Association letter.
3. The age of the tank is not known.
4. Specifications on the tank seams were not provided.
5. The maximum level at which Safety intends to operate the tank has not been given.
6. Provisions for prevention of overfilling of waste materials during waste transfer to or from the tank have not been provided.
7. Clarification of the calculation concerning dike volume given on page III-3 and also on diagram D 12172 is requested as follows:

- a. There are some discrepancies between the two calculations, please clarify.
- b. I do not believe the calculation accounted for displacement of the second existing tank nor the second existing tank's raised slab. Please clarify.
- c. Indicate how stormwater contained within the diked area of the tank farm exhibiting an iridescent sheen would be handled.

8. I did not receive "Exhibit B" which is mentioned on page I.F1-12.

Response:

1. This document is enclosed.
2. Drawing D 12801 (the updated site plan) is enclosed.
3. The age of the tank has been added to section III.
4. Specifications for the tank seams have been added to section III.
5. This information has been added to section III.
6. This information has been added to section III.
7. a. The calculations have been revised to correspond to one another.
b. The second tank and the slab have been indicated in the calculations.
c. This material would be added to the waste storage tank. This information has been added to section III.
8. Exhibit B is enclosed.

Comment (Miscellaneous):

I did not receive a revised table of contents noting the changes and incorporating the additions made to the application.

Response:

A revised table of contents is enclosed.



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610 7347 • 813 623-5561

Bob Martinez, Governor

Dale Trachmann, Secretary

John Shearer, Assistant Secretary
Dr. Richard Curry, Deputy Assistant Secretary

December 21, 1989

Ms. Ellen J. Jurczak, P.E.
Environmental Permits Manager
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

RECEIVED
DEC 27 1989

FHS Dept. Permitting
SAFETY-KLEEN CORP.

Re: Application for Hazardous Waste
Operating Permit
File No. HO29-158820
Tampa, Florida Storage Facility
Second Notice of Deficiency

Dear Mr. Jurczak:

The Department has performed a review of the package dated October 31, 1989 which provided information concerning the above referenced application.

In accordance with Section 17-4.055, Florida Administrative Code, (FAC), I am requesting further clarification of the items presented in the attachment. The response made by Safety-Kleen to each item shall be as noted in Section 17-730.220(5), FAC which details the certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper or lower right-hand margin) and the response must be labelled and numbered such that it can be placed in the appropriate section of the submitted application. This will necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

For your convenience, I have categorized the items requiring further information as they appear on our "permit checklists" which are correlated to the application form.

Ms. Ellen J. Jurczak, P.E.
Safety-Kleen Corporation

December 21, 1989
Page Two

Please present your written response within 45 days of receipt of this notice and provide a copy to the Tallahassee office of FDER and the Atlanta office of EPA. Should you require more than 45 days to prepare this information, you shall notify each office and state the cause of delay and your anticipated submission date. Do not hesitate to contact me at 813/623-5561, extension 389, to discuss the contents of this letter, should you have any questions.

Sincerely,

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

LRM/ab
Attachments

cc: Satish Kastury - DER Tallahassee
Department of Environmental Regulation
Hazardous Waste Section (RCRA)
2600 Blair Stone Road
Tallahassee, Florida 32399

James Scarbrough, P.E. - USEPA
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Part I.

A. General Information

1. Item B-4 §270.13(1) CFR, Topographic Map. Indicate when this information will be submitted, provide your best estimate.

Part II.

A. General

1. Item 4.a §270.14(b)(2)(ii) and (c) CFR, Facility Security. I could not locate the posting of required signs on Exhibits I.D.5-1 and 2. Highlighting this information on your exhibit might be advisable.
2. Item 6 §270.14(b)(2) and §264.13 CFR, Waste Analysis Plan. You have provided a heavy metal analysis for your waste paint thinner, I wanted to know what type of heavy metal analysis has been provided for the waste paint itself.
3. Item 4.d §264.32 and §270.14(b)(6) CFR, Preparedness and Prevention. I cannot locate the position of your emergency equipment, please highlight each item on your diagram.

Part II.

B. Containers §264.170 - .178 CFR, Use and Management of Containers.

1. Diagrams that are clear and readable are requested for the following areas:
 - a. Service center floor, detail all sumps, trenches, piping, etc. Also note any secondary containment provisions along with slope.
 - b. Dock plan - return and fill area, detail all sumps, trenches, piping, etc. Also note any secondary containment provisions along with slopes.
 - c. Dumpsters and associated equipment and any secondary containment provisions along with slopes.
 - d. Exactly where each waste type will be stored.

- e. Complete waste movement, i.e., show exactly where wastes are received from the small pick-up vehicles, off-loaded, temporarily stored, transferred, transported, comingled, placed in dumpster or tank, final storage, readied for off-site disposal, removed off-site by semi-truck and/or tanker. A breakdown of time spent at each point is also requested.

2. I believe there is a typo on diagram I.D.5-2b(2/2) concerning the note in the upper left corner, please clarify. You state in the note on the lower right corner that overflow from the trenches in the accumulation center will proceed to the retention pond. This statement requires the following explanations.
 - a. All associated piping must be clearly detailed from the trenches and sumps in the accumulation center to the pond.
 - b. Do any other overflow pipes from any where within the entire facility proceed to the pond? If so, detail in diagram.
 - c. Does this pond primarily receive stormwater? Detail property drainage, gutters and yard drains conveying stormwaters to the pond.
 - d. The Department advises Safety to consider another alternative other than allowing overflow releases to the pond. If you desire this arrangement it will be necessary to provide two further pieces of information. 1. Provisions for closure of this pond complete with demonstration that contamination has not occurred. 2. Provisions for collecting wastewaters during decontamination of all areas tied, via overflow pipes to the pond, when closure of the facility occurs.
3. In order to observe the 50 feet setback rule it would appear that you will not be able to utilize at least the last 10 feet of the south wall of the accumulation center. How will you achieve this, or what steps will be taken to ensure that ignitable wastes will not be placed in this zone?

Page Three

Part II.

C. Tanks §264.190 - .199 CFR, Tank Systems.

1. I did not receive a revised GAS Association letter concerning tank capability for incorporation into the application.
2. I did not receive diagram D12801 which is referenced in the GAS Association letter.
3. The age of the tank is not known.
4. Specifications on the tank seams were not provided.
5. The maximum level at which Safety intends to operate the tank has not been given.
6. Provisions for prevention of overfilling of waste materials during waste transfer to or from the tank have not been provided.
7. Clarification of the calculation concerning dike volume given on page III-3 and also on diagram D12172 is requested as follows:
 - a. There are some discrepancies between the two calculations, please clarify.
 - b. I do not believe the calculation accounted for displacement of the second existing tank nor the second existing tank's raised slab. Please clarify.
 - c. Indicate how stormwater contained within the diked area of the tank farm exhibiting an iridescent sheen would be handled.
8. I did not receive "Exhibit B" which is mentioned on page IF1-12.

Miscellaneous.

1. I did not receive a revised table of contents noting the changes and incorporating the additions made to the application.



Part B file

Certified Mail - Return Receipt Requested

October 31, 1989
EJJ 89-497

Ms. Lynne Milanian
Permitting Engineer
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

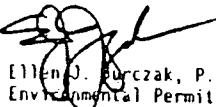
Subject: Tampa Facility
H029-158820

Dear Ms. Milanian,

This has been prepared in response to your letter of September 14, 1989. You will find enclosed responses to your comments, revised pages for the text and revised exhibits.

Please contact me on extension 2246 if you have any questions or require further information.

Sincerely,


Ellen J. Burczak, P.E.
Environmental Permits Manager

EJJ/dfs

cc: FDER, Tallahassee
U.S. EPA, Reg. IV
F. Stockbarger, Tampa Reg. Mgr.
J. Zink
J. Davis, A.C. Mgr.
F. Taylor, Br. Mgr.
Reg. Engr.
J. Chudzik

SAFETY-KLEEN CORPORATION
TAMPA, FLORIDA FACILITY
RESPONSES TO COMMENTS DATED SEPTEMBER 14, 1989

PART I

Comment A.1:

Item A-17, Title 40 Section 270.13(e) Code of Federal Regulation (this will be shortened to only §270.13 CFR in all proceeding references) site ownership status. Indicate who actually owns this property.

Response:

Safety-Kleen has purchased the Tampa facility and the application has been revised to reflect this.

Comment A.2:

Item A-18 §270.13(e), CFR Certification of Application by Professional Engineer. Page fifty of the application is not signed or sealed.

Response:

The completed certification is enclosed.

Comment A.3:

Item B-3 §270.13(h), CFR Scale Drawing and photographs. Drawing must clearly indicate past and present hazardous waste treatment, storage and disposal units/buildings. The drawing submitted describes the constructed areas as proposed, this diagram must be revised as an operation permit has been applied for and the buildings are no longer "proposed" but in existence. No photographs of each area described in the application were submitted.

Response:

A revised site plan is enclosed and photographs are enclosed.

Comment A.4:

Item B-4 §270.13(l), CFR and §270.14(b)(19), CFR Topographic Map. Several requirements are not present on the map and

the scale is too small. A symbol for well locations is listed in the legend but cannot be found on the map.

Response:

Information on well locations has been requested and the revised map will be sent to your office upon completion.

PART II

Comment A.1:

Item 1.A. §270.14(b)(19), CFR Wind Rose. The date on the wind rose appears to be 1967. A more recent one should be obtained. Also, a legend should be provided along with the prevailing wind speed and direction.

Response:

The numbers in the upper left corner refer to the type of wind rose (class 7). A date and legend have been added to this item.

Comment A.2:

Item 1.c. §270.14(b)(10), CFR Traffic Patterns. This information has been overlooked by Safety-Kleen. Include the location of sewer manholes and fire hydrants in your diagram.

Response:

A traffic pattern map with manholes and fire hydrants is enclosed.

Comment A.3:

Item 4.a. §270.14(b)(2)(ii) and (c), CFR Facility Security Information. Indicate if the facility has a fence, its height and location on your site diagram (if present). Otherwise, describe your means to control entry to the site. Cannot locate the posting of signs on submitted Exhibits I.D.5-1 and I.D.5-2.

Response:

The site is fenced and this item is shown on the enclosed site plan.

Comment A.4:

Item 4.b. §264 Subpart D, CFR Contingency Plan. Provide a signed statement authorizing the designated coordinators to commit the necessary resources to implement the plan. Provide revised diagrams for exhibits found in section I.D.5. I cannot make any distinctions, these diagrams did not copy well. The diagrams are labeled as: site plan, service center floor, accumulation center, tank farm plan, dock plan-return and fill area. Detail where each waste item proposed for storage is located and where the emergency equipment is located. A brief narrative of each piece of emergency equipment's capabilities is required. Indicate where wastewater is conveyed that was utilized to decontaminate a given area and equipment as mentioned in the contingency plan.

Response:

A certification letter, revised plans and an emergency equipment list are enclosed.

Comment A.5:

Item 4.c. §270.14 CFR, Subpart to Contingency Plan. You did not provide an explanation in your contingency plan dealing with §270.14(b)(8)1 through v CFR, nor §264.17(a) and (b). Your response will center on the characteristics of the wastes stored, particularly their ignitability and their ability to release toxic fumes upon ignition.

Response:

The referenced regulations are addressed as sections I.E.3d and e.

Comment A.6:

Item 4.d. §264.32 and §270.14(b)(6) CFR, Preparedness and Prevention. You refer to this section as an "Inspection Plan" which is fine, however, the plan must be site specific to the Tampa facility. Your statement "check the facility fence if one exists" is not acceptable. Each item mentioned must be directly related to this site. The plan also states that an internal communication system does not exist as the facility is not large. In accordance with §264.32(a) CFR, an internal communication system must be provided. You have not mentioned the available water supply for emergency purposes and one 10 pound fire extinguisher does not seem

capable of supplying an adequate volume of foam. Is there a fire hydrant on the property and a fire hose?

Response:

The appropriate items in section I.E.4.f and the emergency equipment list have been revised as requested.

Comment A.7:

Item 4.e. §264.16 and §270.14(b)(12) CFR, Personnel Training. The information in the application concerning job titles and duties is presented as a generic description. A site specific explanation for each person is necessary including a brief description on training received thus far and the person's next scheduled training event. Also, indicate who has trained each person at the Tampa site and provide documentation verifying the qualifications of the instructor.

Response:

Safety-Kleen's Personnel Training Program is one that is implemented on a nationwide basis at each of its 172 service centers. This plan has been included in dozens of Part B permits and Safety-Kleen believes it meets the requirements set forth in the regulations. Training (and employee turnover) are ongoing and, consequently, an employee-specific training plan would be required to be updated frequently (at least monthly) throughout the five year life of the permit. Therefore, Safety-Kleen believes individual employees' records would more effectively be reviewed during regular inspections and should not be included in this application.

Comment A.8:

Item 6 §270.14(b)(2) and §264.13 CFR, Waste Analysis Plan. The waste paint analysis, given in Exhibit 2-8a, did not include heavy metals and did not indicate the frequency of the analysis. Also, what is the method utilized to obtain a representative sample and indicate the appropriate reference for the selected test method. Provide a revised Exhibit I.D.4-1, 2, 3 and 4 that will include the same information for waste paints and industrial solvents. I could not find the Appendix D reference for the waste analysis procedures for industrial solvents. Narrative must be included in your waste analysis plan addressing each provision of §264.13(b)(6) and §264.17(b)(1) through (5) CFR.

Response:

The above information has been added to tables I.D.1 through 4 and Exhibit 2-8a is enclosed.

Comment A.9:

Item 7 §264.12, §264.71-77 CFR, Manifest System. Provide a statement acknowledging your understanding of these required notices. Shipments of hazardous waste from small quantity generators (SQG) can be handled with an invoice, however, shipments from large quantity generators must be appropriately manifested. Provide an explanation detailing what occurs should a significant discrepancy be noted during pick-up of a waste from large and SQG.

Response:

This information has been added to section I.D.6.

Comment B.1:

Item 1(b) §264.170-.178 CFR, Use and Management of Containers. Provide the actual grade of the floor or the degree of sloping. The diagram submitted is impossible to read, you mention there are 4 trenches (A-D) and 2 sumps available, their location cannot be determined. Exact placement of each stored waste and the curbing is not known. These items must be clearly detailed on the diagram (noting heights, depths, widths and lengths) and explained in the narrative. The calculation noted as Exhibit I.D.5-2b does not mention the available containment that would be provided by curbing. Why is that and submit the missing information. Indicate the amount of liquid material that could be contained within the curbing before a release would occur and where would liquid proceed in excess of curb system capacity? You have stated that all drums will be placed on pallets, is this also true for all boxes? Clearly show in your revised diagram, the difference between the service and accumulation center and the location of the dumpsters and all associated equipment.

Provide clarification for the following comments that have been given as containment storage capacities:

Exhibit I.D.5-2b states, 298 double-stacked pallets X 9 drums/pallets X 16 gallons/drum (this comment does not include possible storage of 55-gallon drums.)

Section II on page 11-2 states, capacity of 892 55-gallon drums or 3069 16-gallon drums.

A narrative stating the amount of each waste, its container size, its storage placement and its contents is required along with a descriptive diagram. Calculations must be based on the worst case scenario, which would be maximum storage of each waste type in its designated container and specific location. Your diagram should clearly indicate whether or not each area has its own containment system. If not, it will be necessary to address run-on from one leaking storage area to the other storage locations.

Indicate how long wastes received, remain in the service center before being transferred to the storage area.

Response:

Revised Floor Plans and exhibits which include the above information are enclosed.

Comment B.2:

Item 2. §264.176 CFR, Ignitable Wastes in Containers. On your site plan, you must provide information confirming that all activities associated with the ignitable wastes are located at least 50 feet from the facility's property line. A statement verifying this item is necessary.

Response:

This information has been added to the site plan.

Comment B.3:

Item 6. §264.112 and .114 CFR, Closure of Drum Storage Area. The maximum waste inventory did not include storage of 55-gallon drums. What parameters will be analyzed to determine the effectiveness of the decontamination of the floors and containment areas via wash down with detergent? Provide a list of equipment to be utilized to achieve clean closure and indicate if the equipment will be decontaminated or disposed, and how.

Response:

The maximum waste inventory is a volume which includes any combination of boxes, 5-gallon pails, 16-gallon drums, 30-gallon drums and/or 55-gallon drums. This information and information concerning decontamination have been added to section I.F.1.b and c.

Comment C.1:

Item 1. §264.190 - .199 CFR, Tank Systems. Diagrams referencing the tank in the submitted application describe proposed plans. This is appropriate for a construction permit but not an operating permit. Certification of completion of construction documents are necessary for this tank. Diagrams must include a flow pattern detailing waste entrance to the facility, how it is routed to the tank and how it finally leaves the site for treatment, all associated equipment must be detailed on the diagram, as well as materials of construction.

The June 9, 1989 GAS Assoc., Inc. letter must be revised to be placed in the proper location of the permit application and the drawings referenced as D 12034, 12801 and 12172 must be submitted. The tank foundation and structural support specifications are missing. Tank dimensions, design standard code and age are not known. No information concerning the specifications of the tank seams has been given. Maximum height/operating level of liquid not provided. External corrosion provisions have been met, however, no mention of external and internal erosion nor internal corrosion provisions have been specified. Documentation for the tank's compatibility with the contents has not been provided. Maintenance of minimum shell thickness was not discussed. Tank integrity examination results have not been mentioned. Narrative concerning the prevention of overfilling was not addressed.

Response:

An updated tank system drawing is enclosed.

Comment C.2:

Item 7. §264.193 CFR, Secondary Containment System. Secondary containment was not reviewed as diagram D 12172 is unavailable. You have mentioned that a total volume of 26,543 gallons is available within the dike, however, you did not mention if the tank's displacement volume was accounted for. Indicate the amount of liquid that can be contained without overflowing the embankment and provide all supporting calculations utilized.

In what manner is accumulated stormwater released from the diked tank farms? Piping, sumps and pumps, if any, must be presented on the diagram. Provide calculations satisfying the requirements of 264.193(e)(ii) which describes release to the diked area during the 25-year 24-hour

storm event. (This storm event involves the receipt of approximately 9.5 inches of rain within a 24-hour period.)

Response:

Secondary containment calculations have been added to section III. In addition, an updated tank system drawing is enclosed. Stormwater may be removed from the sump in the corner of the dike using a handheld pump.

Comment C.4:

Item 11. §264.195 CFR, Inspection Schedule. Indicate all the details concerning the methodology to be utilized to empty the tank to allow entry and inspection for normal wear observances and the frequency of such inspection.

Response:

This information has been added to section III.

Comment C.5:

Item 12. §264.111, .112 and .114 CFR, Closure. Describe the manner to be utilized verifying that the loading dock and dumpster (serving the tank) have been clean closed. Provide a similar explanation for the tank and all its associated equipment. Indicate the decontamination procedures to be followed, a list of equipment to assist closing and cleaning, and how the "clean-up" equipment will also be decontaminated.

Provide an estimate detailing the maximum amount of waste inventory that will be present in the loading dock, dumpster and entire tank system prior to closure proceedings.

Indicate what parameters the soil around the tank farm will be analyzed for to demonstrate absence of contaminants. From whence will the samples be obtained (a diagram would be useful) and how will you ensure that representative samples have been secured?

Response:

This information has been added to appropriate sections of the closure plan.



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Park Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Marano, Governor

Dirk Truchmann, Secretary

John Shearer, Assistant Secretary
Lt. Richard Gentry, Deputy Assistant Secretary

September 14, 1989

Mr. Scott E. Fore
V.P., Environmental, Health & Safety
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

RECEIVED
SEP 26 1989

Re: Application for Hazardous Waste
Operating Permit
File No. H029-158820
Tampa, Florida Storage Facility

Environmental Department
SAFETY-KLEEN CORP.

Dear Mr. Fore:

The Department has performed a review on the two following submittals received from your organization.

1. Permit Application dated November 8, 1988 and submitted November 22, 1988.
2. Capability of storage tank system dated May 17, 1989 and submitted June 9, 1989.

In accordance with Section 17-4.055, Florida Administrative Code, (FAC) I am requesting clarification of the items presented in the attachment. The response made by Safety-Kleen to each item shall be as noted in Section 17-730.220(5), FAC which details the certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (for instance, a notation of revision including a date in either the upper or lower right-hand margin) and the response must be labelled and numbered such that it can be placed in the appropriate section of the submitted application. This will necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

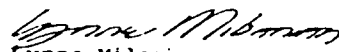
Mr. Scott E. Fore
Safety-Kleen Corporation

September 11, 1989
Page Two

For your convenience, I have categorized the items requiring further information as they appear on our "permit checklists" which are correlated to the application form.

Please present your written response within 45 days of receipt of this notice and provide a copy to the Tallahassee Office of FDER and the Atlanta office of EPA. Should you require more than 45 days to prepare this information, you shall notify each office and state the cause of delay and your anticipated submission date. Do not hesitate to contact me at 813/621-5561, ext. 389, to discuss the contents of this letter, should you have any questions.

Sincerely,


Lynne Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LM/ab
Attachments

cc: Scott Eaton - Safety-Kleen
Rob Omiecinski - Safety-Kleen

Satish Kastury - DER Tallahassee
Department of Environmental Regulation
Hazardous Waste Section (RCRA)
2600 Blair Stone Road
Tallahassee, Florida 32399

James Scarbrough, P.E. - USEPA
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

ATTACHMENT

Part I

A. General Information

1. Item A-17, Title 40 Section 270.13(e) Code of Federal Regulation (this will be shortened to only §270.13 CFR in all proceeding references) site ownership status. Indicate who actually owns this property.
2. Item A-18 §270.13(e), CFR Certification of Application by Professional Engineer. Page fifty of the application is not signed or sealed.
3. Item B-3 §270.13(h), CFR Scale Drawing and photographs. Drawing must clearly indicate past and present hazardous waste treatment, storage and disposal units/buildings. The drawing submitted describes the constructed areas as proposed, this diagram must be revised as an operation permit has been applied for and the buildings are no longer "proposed" but in existence. No photographs of each area described in the application were submitted.
4. Item B-4 §270.13(1), CFR and §270.14(b)(19), CFR Topographic Map. Several requirements are not present on the map and the scale is too small. A symbol for well locations is listed in the legend but cannot be found on the map.

Part II

A. General

1. Item 1.A. §270.14(b)(19), CFR Wind Rose. The date on the wind rose appears to be 1967. A more recent one should be obtained. Also, a legend should be provided along with the prevailing wind speed and direction.
2. Item 1.C. §270.14(b)(10), CFR Traffic Patterns. This information has been overlooked by Safety Kleen. Include the location of sewer manholes and fire hydrants in your diagram.
3. Item 4.a. §270.14(b)(2)(ii) and (c), CFR Facility Security Information. Indicate if the facility has a fence, its height and location on your site diagram (if present). Otherwise, describe your means to control entry to the site. Cannot locate the posting of signs on submitted Exhibits I.D.5-1 and I.D.5-2.

4. Item 4.b. §264 Subpart D, CFR Contingency Plan. Provide a signed statement authorizing the designated coordinators to commit the necessary resources to implement the plan. Provide revised diagrams for exhibits found in section I.D.5. I cannot make any distinctions, these diagrams did not copy well. The diagrams are labeled as: site plan, service center floor, accumulation center, tank farm plan, dock plan-return and fill area. Detail where each waste item proposed for storage is located and where the emergency equipment is located. A brief narrative of each piece of emergency equipment's capabilities is required. Indicate where wastewater is conveyed that was utilized to decontaminate a given area and equipment as mentioned in the contingency plan.
5. Item 4.c. §270.14 CFR, Subpart to Contingency Plan. You did not provide an explanation in your contingency plan dealing with §270.14(b)(8)i through v CFR, nor §264.17(a) and (b). Your response will center on the characteristics of the wastes stored, particularly their ignitability and their ability to release toxic fumes upon ignition.
6. Item 4.d. §264.32 and §270.14(b)(6) CFR, Preparedness and Prevention. You refer to this section as an "Inspection Plan" which is fine, however, the plan must be site specific to the Tampa facility. Your statement "check the facility fence if one exists" is not acceptable. Each item mentioned must be directly related to this site. The plan also states that an internal communication system does not exist as the facility is not large. In accordance with §264.32(a) CFR, an internal communication system must be provided. You have not mentioned the available water supply for emergency purposes and one 10 pound fire extinguisher does not seem capable of supplying an adequate volume of foam. Is there a fire hydrant on the property and a fire hose?
7. Item 4.e. §264.16 and §270.14(b)(12) CFR, Personnel Training. The information in the application concerning job titles and duties is presented as a generic description. A site specific explanation for each person is necessary including a brief description on training received thus far and the person's next scheduled training event. Also, indicate who has trained each person at the Tampa site and provide documentation verifying the qualifications of the instructor.
8. Item 6 §270.14(b)(2) and §264.13 CFR, Waste Analysis Plan. The waste paint analysis, given in Exhibit 2-8a, did not include heavy metals and did not indicate the frequency of the analysis. Also, what is the method utilized to obtain a representative sample and indicate the appropriate reference for the selected test method. Provide a revised Exhibit I.D.4-1.2,3 and 4 that will include the same information for waste paints and industrial solvents. I could not find the Appendix D reference for the waste analysis procedures for

industrial solvents. Narrative must be included in your waste analysis plan addressing each provision of §264.13(b)(6) and §264.17(b)(1) through (5) CFR.

9. Item 7 §264.12, §264.71-77 CFR, Manifest System. Provide a statement acknowledging your understanding of these required notices. Shipments of hazardous waste from small quantity generators (SQG) can be handled with an invoice, however, shipments from large quantity generators must be appropriately manifested. Provide an explanation detailing what occurs should a significant discrepancy be noted during pick-up of a waste from large and SQG.

Part II

(B) Containers

1. Item 1(b) §264.170-.178 CFR, Use and Management of Containers. Provide the actual grade of the floor or the degree of sloping. The diagram submitted is impossible to read, you mention there are 4 trenches (A-D) and 2 sumps available, their location cannot be determined. Exact placement of each stored waste and the curbing is not known. These items must be clearly detailed on the diagram (noting heights, depths, widths and lengths) and explained in the narrative. The calculation noted as Exhibit I.D.5-2b does not mention the available containment that would be provided by curbing. Why is that and submit the missing information. Indicate the amount of liquid material that could be contained within the curbing before a release would occur and where would liquid proceed in excess of curb system capacity? You have stated that all drums will be placed on pallets, is this also true for all boxes? Clearly show in your revised diagram, the difference between the service and accumulation center and the location of the dumpsters and all associated equipment.

Provide clarification for the following comments that have been given as containment storage capacities:

Exhibit I.D.5-2b states, 298 double-stacked pallets X 9 drums/pallets X 16 gallons/drum (this comment does not include possible storage of 55-gallon drums).

Section II on page 11-2 states, capacity of 892 55-gallon drums or 3069 16-gallon drums.

A narrative stating the amount of each waste, its container size, its storage placement and its contents is required along with a descriptive diagram. Calculations must be based on the worst case scenario, which would be maximum storage of each waste type in its designated container and specific location.

Your diagram should clearly indicate whether or not each area has its own containment system. If not, it will be necessary to address run-on from one leaking storage area to the other storage locations.

Indicate how long wastes received, remain in the service center before being transferred to the storage area.

2. Item 2. §264.176 CFR, Ignitable Wastes in Containers. On your site plan, you must provide information confirming that all activities associated with the ignitable wastes are located at least 50 feet from the facility's property line. A statement verifying this item is necessary.
3. Item 6. §264.112 and .114 CFR, Closure of Drum Storage Area. The maximum waste inventory did not include storage of 55-gallon drums. What parameters will be analyzed to determine the effectiveness of the decontamination of the floors and containment areas via wash down with detergent? Provide a list of equipment to be utilized to achieve clean closure and indicate if the equipment will be decontaminated or disposed, and how.

Part II

C. Tanks

1. Item 1. §264.190 - .199 CFR, Tank Systems. Diagrams referencing the tank in the submitted application describe proposed plans. This is appropriate for a construction permit but not an operating permit. Certification of completion of construction documents are necessary for this tank. Diagrams must include a flow pattern detailing waste entrance to the facility, how it is routed to the tank and how it finally leaves the site for treatment, all associated equipment must be detailed on the diagram, as well as materials of construction.

The June 9, 1989 GAS Assoc., Inc. letter must be revised to be placed in the proper location of the permit application and the drawings referenced as D 12034, 12801 and 12172 must be submitted. The tank foundation and structural support specifications are missing. Tank dimensions, design standard code and age are not known. No information concerning the specifications of the tank seams has been given. Maximum height/operating level of liquid not provided. External corrosion provisions have been met, however, no mention of external and internal erosion nor internal corrosion provisions have been specified. Documentation for the tank's compatibility with the contents has not been provided. Maintenance of minimum shell thickness was not discussed. Tank integrity examination results have not been mentioned. Narrative concerning the prevention of overfilling was not addressed.

2. Item 7. §264.193 CFR, Secondary Containment System. Secondary containment was not reviewed as diagram D 12172 is unavailable. You have mentioned that a total volume of 26,543 gallons is available within the dike, however, you did not mention if the tank's displacement volume was accounted for. Indicate the amount of liquid that can be contained without overflowing the embankment and provide all supporting calculations utilized.

In what manner is accumulated stormwater released from the diked tank farms? Piping, sumps and pumps, if any, must be presented on the diagram. Provide calculations satisfying the requirements of 264.193(e)(ii) which describes release to the diked area during the 25-year 24-hour storm event. (This storm event involves the receipt of approximately 9.5 inches of rain within a 24-hour period.)

3. Item 10. §264.198 CFR, Requirements for Ignitable Waste. Present a written narrative addressing each item discussed in Section 264.198 CFR.
4. Item 11. §264.195 CFR, Inspection Schedule. Indicate all the details concerning the methodology to be utilized to empty the tank to allow entry and inspection for normal wear observances and the frequency of such inspection.
5. Item 12. §264.111, .112 and .114 CFR, Closure. Describe the manner to be utilized verifying that the loading dock and dumpster (serving the tank) have been clean closed. Provide a similar explanation for the tank and all its associated equipment. Indicate the decontamination procedures to be followed, a list of equipment to assist closing and cleaning, and how the "clean-up" equipment will also be decontaminated.

Provide an estimate detailing the maximum amount of waste inventory that will be present in the loading dock, dumpster and entire tank system prior to closure proceedings.

Indicate what parameters the soil around the tank farm will be analyzed for to demonstrate absence of contaminants. From whence will the samples be obtained (a diagram would be useful) and how will you ensure that representative samples have been secured?



Certified Mail - Return Receipt Requested

October 27, 1989

Ms. Lynne Milanian
Permitting Engineer
Florida Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, FL 33610

Subject: Tampa Service Center

Dear Ms. Milanian,

This letter is to confirm that the employees listed as emergency coordinators in the contingency plan for the subject facility are authorized to commit the necessary resources to implement the plan.

Sincerely,

Scott E. Fore
Scott E. Fore
Vice President
Environment, Health and Safety



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Park Boulevard • Tampa, Florida 33610 7347 • 813-625 5561

Bob Martinez, Governor

Dale Trautmann, Secretary

John Streater, Assistant Secretary
Dr. Richard Loring, Deputy Assistant Secretary

June 15, 1989

RECEIVED
JUN 19 1989

Environment and Natural Resources
SAFETY-KLEEN CORP.

Mr. Rob Omiecinski
Environmental Permit Writer
Safety-Kleen
777 Big Timber Road
Elgin, Illinois 60123

Re: Tampa Service Center
Hazardous Waste Operating Permit Application
File No. H029-158820

Dear Mr. Omiecinski:

The Department acknowledges receipt of your submittal dated June 7, 1989 concerning the design installation plan of Safety-Kleen's aboveground hazardous waste storage tank system.

Upon review of this package and the submitted application, the Department will contact you by telephone to discuss items requiring further clarification if any. Do not hesitate to call should you have any questions.

Sincerely,

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

LM/ab

cc: Satish Kastury - DER/Tallahassee
James Scarbrough - EPA/Atlanta



Tampa

December 6, 1988
EJJ 88-453

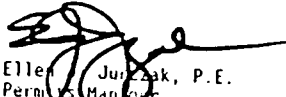
Mr. Bill Crawford
Florida Department of Environmental Regulation
7601 Highway 301 North
Tampa, FL 33637-9544

Dear Mr. Crawford,

As we discussed earlier today, there was some confusion as to the appropriate permit application fee. I am resubmitting the \$2,000 fee for the Tampa facility's operating permit application.

Please contact me on extension 2246 if you have any comments or require further information.

Sincerely,


Ellen J. Zink, P.E.
Permits Manager

EJJ/dfs



I.E. 3-9

Certified Mail - Return Receipt Requested

May 31, 1989
RO 89-122

Mr. Armando Gonzales
Permitting Engineer
Florida Dept. of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, FL 33610

Subject: Tampa Service Center

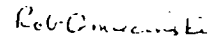
Dear Mr. Gonzales,

Please find enclosed the original and five copies of the design installation plan of Safety-Kleen's aboveground hazardous waste storage tank system at the subject facility, as reviewed by Graef, Anhalt, Schloemer, and Associates, Inc., Consulting Engineers (GAS).

Safety-Kleen believes this submission completes the operating plan for the subject facility.

If you have any questions, please contact me on extension 2550.

Sincerely,



Rob Omiecinski
Environmental Permit Writer

RO/dfs

cc: F. Stockbarger, Tampa Reg. Mgr.
J. Zink
Branch and A.C. Mgrs. (3-163-01)
S. Eaton
G. DeMers



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • 610 7347 • 813-623-5561

Bob Matting, Chairman

Dale Trachmann, Secretary

John Streater, Assistant Secretary
Richard Gentry, Deputy Assistant Secretary

RECEIVED

October 1988

OCT 27 1988

Environmental Department
SAFETY-KLEEN CORP.

Ellen J. Jurczak, P.E.
Permits Manager
Safety-Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

Re: Safety-Kleen Corp., PLD 980 847 271
Operation Permit Application B029-118985

Dear Ms. Jurczak:

The application referenced above has been withdrawn from our files due to the lack of payment of the proper application fee. The attached letter refers to the fee amount paid sometime ago. Fees for every type of application are stipulated in the Florida Administrative Code Rule 17-4 and we have to follow them.

Also, a letter is enclosed which will resolve the issue concerning the operating mode for the new Tampa facility. If you have any questions, please call me at 813/623-5561.

Sincerely,

Armando Gonzalez
Permitting Engineer
Hazardous Waste Program

AG/br

cc: Satish Kastury - DER/Tallahassee (w/attachments)
Thomas Maurer, DER/Tallahassee (w/attachments)
Diane Trommer - DER/Tampa (w/attachments)

Part B file



Certified Mail - Return Receipt Requested

November 15, 1988
EJJ 88-430

Mr. Armando Gonzales
Florida Department of Environmental Regulation
7601 Highway 301 North
Tampa, FL 33637-9544

Subject: Tampa Facility
Operating Permit Application

Dear Mr. Gonzales,

Please find enclosed four copies of Safety-Kleen's operating permit application for the subject facility. The certification has been sent to a professional engineer who is registered in Florida for his seal. It will be sent to your office upon receipt.

If you have any questions or require further information, please contact me on extension 2246.

Sincerely,

Ellen J. Jurczak, P.E.
Permits Manager

EJJ/dfs

cc: F. Stockbarger, Tampa Reg. Mgr.
Branch and A.C. Mgrs. (3-163-01)
S. Eaton
G. DeMers



June 16, 1986

Dr. Richard D. Garrity, Dist. Mgr.
Southwest District
Florida Dept. of Environmental Regulation
7601 Highway 301 N.
Tampa, FL 33610

Re: Safety-Kleen Corp. 3-163-01
FLD 980847271; Tampa

Dear Dr. Garrity:

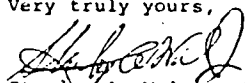
Enclosed please find check No. 689582 in the amount of one thousand dollars (\$1,000.00). This is payment of the permit application fee for the application for a Construction and Operating Permit for the above referenced facility. The application itself was submitted to the Department on April 4, 1986.

Please note a typographical error made in the application that was submitted. The Tampa facility's ID# is FLD980847271 not FLD980847214 as was indicated. We apologize for this inadvertent mistake.

If you have any questions, please contact me at 312-697-8460.

Please also note that the US Post Office has made a Zip Code change for our Elgin, Illinois office from 60120 to 60123.

Very truly yours,


Stanley A. Walczynski
Regional Environmental Engineer

SAW/ber

Enclosure

cc: Ellen Jurczak
Br. Mgr. 3-163-01
Wang Engineering
Satish Kastusry, FLDER, Tallahassee

Oct 15, 1990

Concerning Safety-Kleen Tampa Service Center
HO 29-158820 Operating Permit Application

1. Application (HO 29-158820) submitted November 22, 1988 not signed and sealed, no tank assessment
2. Harold Varchmin P.E. for Safety-Kl says he inspected the Tampa facility during February of 1989 and that he would not sign and seal the application. As of this date we have no proof of this inspection or Harold's other actions

3. June 9, 1989 received tank assessment, it was signed, but not sealed, as such not valid.

3.5 Application review started June 9, 1989

4. September 14, 1989 1st NOID sent
main areas of concern included need for P.E. sign/seal, and
readable diagrams for all the waste management
areas

5. November 2, 1989 response to 1st NOID
received, included a P.E. certification
dated October 18, 1989 - the other 3
signatures given dated as Nov 7, 1988

6. December 21, 1989 2nd NOD sent
main areas of concern included PE sign/seal for all new diagrams and calculations, readable diagrams for the service center, dock area and the dumpsters, where each waste would be stored and another alternative to the proposed routing of excess liquids contained in the collection trench to the unlined retention pond out back.
7. February 14, 1990 response to 2nd NOD received
8. March 26, 1990 3rd NOD sent
main areas of concern, failure to have diagrams & calculations signed/sealed by P.E., still problems with dock area sumps, dumpsters and containment capacity, questions on the service center storage area and the south building storage area.
9. April 30, 1990 response to 3rd NOD received
- 9.5. May 10, 1990 sent draft permit to EPA/Tallah for comment

10. May 24, 1990 Fax sent from Safety-K to correct diagram submitted with the 3rd response package that was not correct

11. June 14, 1990 on-site inspection conducted to certify completion of construction and to finalize operating permit application - Discrepancies noted which formed the basis for preparing the enforcement referral, the warning notice and the intent to deny.

12. June 20, 1990 letter sent to Safety-K indicating brief inspection results and that this matter had been referred to the FL Board of prof. Reg. and DER enforcement. 4 main areas noted, ① submission of inaccurate calculations, diagram and narrative for the N. bldg, the dock area and the S. bldg ② failure to comply with tank system standards for the 3 dumpsters ③ failure to provide adequate containment for the drum storage area in the N. bldg ④ failure to design the entire bldg to minimize release to the environment.

13. June 22, 1990 detailed enforcement referral presented to Beth
14. July 17, 1990 complaint form sent to Dept of Professional Regulations
15. July 30, 1990 notified Harold Farachman via phone that we had filed a complaint to the Dept of Prof reg.
16. Aug 1, 1990 letter from Harold Farachman stating he refused to sign the port charlotte permit application and that safety was not providing complete information concerning the tampa facility

17. Aug 10, 1990 Permit Denial prepared for comments
18. Aug 2, 1990 Civil penalty Authorization prepared for Beth
- 18.5 Aug 24, 1990 informal meeting w/ Harold Forchman (see note #2)
19. Sept 6, 1990 Rick Garrity signed #18
Sept 13, 1990 Somebody signed for Dale. on #18
20. Intent to Deny H029-158820 sent on Sept 21, 1990
Warning Notice sent on Sept 26, 1990
21. Scheduled meeting for Oct 16, 1990 w/ 2 safety-K officials and 2 attorneys previously employed by DER.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

Ask Bill about the (D.O.)

TO: Lynne Milanian
Engineer III - Tampa

THROUGH: William Crawford
Engineer IV - Tampa

Victor San Agustin ^{VSA}
Professional Engineer II - Tampa

Bill Neimes, Professional Engineer II ^W
Hazardous Waste Regulation

FROM: Douglas G. Outlaw, Professional Engineer ^{DGO}
Hazardous Waste Regulation

DATE: June 11, 1990

SUBJECT: Safety Kleen, Tampa; FLD 980 847 271; H029-158820;
Draft Operating Permit

D. E. R.

JUN 14 1990

SOUTHWEST DISTRICT
TAMPA

I have reviewed the draft operating permit for the Safety Kleen, Tampa, Facility. Review comments are as follows:

- The zip code for Safety Kleen has been changed to 60123.
- The reference to DER Form 17-730.401(2) should be DER Form 17-730.901(2) on page 2 of the Intent to Issue. *they used the old form*
- In the same paragraph of the Intent to Issue, May 24, 1990, should be added to the list of amended dates.
- Each Intent to Issue notice should be marked for newspaper publication or radio announcement. *?*
- Change the year of operating permit application submittal from 1989 to 1988 on page 4 of the draft permit.
- Delete 40 CFR 264 Subpart F *(F) will be deleted, now protection?* from Specific Condition 1, Part I, and move the last word up to the preceding line.
- Insert "as required by" in front of the reference to 40 CFR 264.73(b)(9) in Specific Condition 25, Part I.

5590

Memo to Ms. Milanian
Page 2
June 11, 1990

- h. In the first line of Specific Conditions 28, Part I, insert "(except Specific Condition 26 of this part)" after the word conditions. Add the following condition:

All submittals in response to Specific Condition 26 of this part shall be submitted to :

Financial Coordinator
Hazardous Waste Regulation Section
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

- i. The reference to 40 CFR 264.173 in Specific Condition 3, Part II, should be 40 CFR 264.172
- j. The reference to 40 CFR 264.174(b)(5) in Specific Condition 10, Part, II should be 40 CFR 264.175(b)(5).
- k. The reference to Figure 12172 in Specific Condition 4, Part III, appears to be 12173; however, the number did not reproduce clearly on the review copy.

If you should have any questions, please call me at SUNCOM 278-0300.

DGO/dgo

cc: Jim Scarbrough, EPA/Region IV
Robert Frost, BWP&R