

Thursby, Kim

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Thursday, July 21, 2016 12:07 PM
To: Epost HWRS (Shared Mailbox)
Subject: RE: First Request for Additional Information (RAI); Hillsborough County-Hazardous Waste; Facility Name: Safety-Kleen Systems, Inc; Facility ID: FLD980847271; DEP Application No.: 34744-HO-007

Received.

Thank you

From: Outley, Debra [mailto:Debra.Outley@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Wednesday, July 20, 2016 2:09 PM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Cc: Herrald, Fletcher <Fletcher.Herrald@dep.state.fl.us>; Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; Evans, Roger <Roger.Evans@dep.state.fl.us>; 'bob.fox@erm.com' <bob.fox@erm.com>; Hansen, Mark E <Mark.Hansen@safety-kleen.com>; Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>; Vaughn, Richard <Richard.Vaughn@dep.state.fl.us>
Subject: First Request for Additional Information (RAI); Hillsborough County-Hazardous Waste; Facility Name: Safety-Kleen Systems, Inc; Facility ID: FLD980847271; DEP Application No.: 34744-HO-007

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

REQUEST FOR ADDITIONAL INFORMATION

July 20, 2016

Mr. Jeff Curtis
EHS Manager
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, Florida 33426
Jeff.Curtis@safety-kleen.com

Re: First Request for Additional Information (RAI)
Hillsborough County-Hazardous Waste
Facility Name: Safety-Kleen Systems, Inc.
Facility ID: FLD980847271
DEP Application No.: 34744-HO-007

Dear Mr. Curtis:

Thank you for your application for an Operating and Corrective Action permit for the above referenced Facility. The Department has assigned DEP Application No. 34744-HO-007 to the application. A Department staff review of the application and supporting documentation submitted on May 27, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, August 19, 2016, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to merlin.russell@dep.state.fl.us. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to

Mr. Jeff Curtis

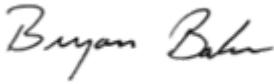
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July 20, 2016

merlin.russell@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Merlin D. Russell Jr. by telephone at 850-245-8796 or by e-mail at merlin.russell@dep.state.fl.us

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

cc:

Roger Evans, DEP Southwest District, roger.evans@dep.state.fl.us

Robert W. Fox, ERM, bob.fox@erm.com

Mark Hansen, Safety-Kleen, mark.hansen@safety-kleen.com

Beth Knauss, DEP Southwest District, Elizabeth.knauss@dep.state.fl.us

Richard Vaughn, DEP Southwest District, Richard.vaughn@dep.state.fl.us

Attachment: List of Requested Information

Facility Name: Safety-Kleen Systems, Inc.
Facility ID: FLD 980 847 271
DEP Application No.: 34744-HO-007

General Comments:

1. Any revisions to the Part B in one location must be done throughout the document. Although this RAI tries to point out multiple locations throughout the Part B where identical changes are required or suggested, it is the responsibility of Safety-Kleen to ensure changes are made throughout the Part B.

Specific Comments:

2. Part I

- a. Page 4 Injection and Withdrawal Wells... This section appears to need an update because there is a withdrawal well on site. Section 3.1.4 of Safety-Kleen's August 2012 Site Assessment Report states:

"An onsite water well is located at the northeast corner of the S-K property within a pump house, as shown in Figure 2.3. The 2011 ROPRA (in the Contingency Plan, on p. 28) indicates that a fire suppression system is available at the facility, and that the system is supplied water from the onsite water well. The 2011 ROPRA (Part I.B.4, Table 2.2-2) also indicates that this "Public Supply" well is 5-inches in diameter, with a cased depth of 81 ft, and a total depth of 121 ft (Appendix 3A herein). As such, this well is completed within the Upper Floridan aquifer."

The same information needs to be added to page Part II.A, page 2. Also, there are three wells within ¼ mile of the facility according to other parts of the application (e.g., Part I, Table 2.2-1).

- b. Page 5: Under the Description of Facility Operation, a brief description of waste oil is omitted and should be included in length and scope similar to the other waste streams.
- c. Page 7: Antifreeze is not included on the list of numbered wastes.
- d. Page 8, paragraph 2: This paragraph should note that there is no bulk storage of antifreeze at the branch. As is noted in Part II.P, the tanker that held used antifreeze was removed from the facility in 2009 (See discussions on SWMU-13).
- e. Page 9: At least one figure must identify the battery storage area.
- f. Page 9: The Continued Use Program (CUP) was approved prior to the Department's adoption of the new legitimacy criteria for recycling of hazardous secondary materials in 40 CFR 260.43. Safety-Kleen's discussion of the Continued Use Program does not include a reference to the Department's CUP approval in a letter dated October 25, 1999. Safety-Kleen's permit subsequent permit modification dated October 4, 2000 included a number of operating conditions intended to ensure that this was a legitimate

recycling process. In view of the new conditions imposed under 40 CFR 260.43, please provide documentation that the Continued Use Program satisfies the legitimacy criteria under 40 CFR 260.43.

g. Page 10, Part I.D.3 Process Codes and Design Capacities:

- i. The discussion on the parts washer solvents managed does not distinguish between the spent premium solvent used in conventional parts washers vs. the solvent still bottoms recovered from Safety-Kleen's distilling parts washers (System One type units). Please address how these still bottom wastes will be characterized and managed by the company. Does the management method differ if the customer is identified as a small or large quantity generator, as opposed to a conditionally exempt small quantity generator?
 - ii. The "Process Design Capacity" for the Branch-Generated Liquids and Tank Bottoms should both be 12,749 (not 12.749).
 - iii. Antifreeze is missing from the Table.
 - iv. "Retain Samples from Used Oil Operations" and "Spent Aerosol Cans" are missing from the table (Table 5.1-1 in the Contingency Plan includes both of these).
 - v. D002 should be included as a transfer waste.
- h. Figure 2.1-1 *Facility Layout*... Here or elsewhere the location of the onsite Floridan well should be shown.
- i. Table 2.2-1 Well Search Report does not identify well locations on a figure. Well locations should be identified on a map.

3. **Certification pages.** – We do not believe that Mark Hansen is authorized to sign for Safety-Kleen. Only an officer or a non-officer with written signatory authorization can sign for a Corporation. In Safety-Kleen's most recent filing on Sunbiz, Mr. Hansen is not listed as an officer. Mr. Hansen would need to provide a certification of authority from an officer of Safety-Kleen in order to sign documents on Safety-Kleen's behalf. In the absence of a signed certification of authority for Mr. Hansen, the certification pages will need to be signed by an officer of Safety-Kleen Systems, Inc.

4. **Part II.A - General, pg. 1:** The word "Toppography" is misspelled.

5. **Contingency Plan**

- a. Page 4, General Description of Activities should include a brief discussion of the used oil.
- b. Page 6: Safety-Kleen indicates that the area storing universal waste lamps will be marked in accordance with paragraph 62-737.400(5)(b), FAC. The boxes or the lamps must be labeled, not the area in which they are stored. Safety-Kleen should be using the marking requirements required by 40 CFR 273.14(e).
- c. Page 12: To assist (if needed) in notifying neighboring establishments, we recommend that contacts be included in the CP.
- d. Page 17:
 - i. The CP should include discussions on the above-ground piping because the supports have failed in the past. Also, include a figure that shows the locations of the above-ground piping.
 - ii. Under ***Spill Control Procedures***, item 1 should probably be "Stop the discharge." Transferring liquids to a good container may be one way to stop a discharge. Another method would be to close the valve (for tanks).

- e. Page 17: Although Safety-Kleen stores primarily liquid wastes, some non-liquid wastes are stored (e.g., Branch-generated Solids (Debris)). The CP must be revised to address response to solid (physical state) waste.
- f. Page 20: The first sentence is repeated (See last sentence on page 19).
- g. Page 22: Under **Tank Area**, Figure 5.6-5 should be revised to show the location of the shallow drainage trench, and sump in the southwestern corner of the secondary containment.
- h. Presumably the text is intended to address Employee Strikes, and not lightening strikes. The text should be clarified.
- i. Page 28, **Hurricane Watch**: We'd recommend that the list of employees and phone numbers be developed *prior* to the onset of a hurricane, and updated whenever there are changes in personnel or contact information.
- j. Page 29, **Evacuation Plan**: There should be a reference to Figure 5.6-6 that illustrates the evacuation route and gathering point.
- k. Figure 5.2-1: Remove Chris Abel's name and title from the checklist
- l. In comparing Figures 5.6-1 and 5.6-3, it appears that the "**Flammable**/Nonflammable Waste Staging Area (on Figure 5.6-3) is within the "**Non-Flammable Area 2**" (on Figure 5.6-1).
- m. Figure 5.6-6, Evacuation Routes: The figure is too busy. It should be simplified and internal evacuation routes should be added.
- n. Table 5.2-1
 - i. Does not include the weekly check of communication devices discussed at the top of page 8.
 - ii. Does not include checking to ensure that inbound and outbound containers have not exceeded the 72-hour period for unloading or shipping.
- o. Table 5.2-1: Include above-ground piping
- p. Table 5.6-1, Emergency Response Equipment. There are inconsistencies in locations of the telephones when compared to Figure 5.6-1:
 - i. The figure shows no telephones in either office (there is an office north of the North Building and an office in the northeast corner of the South Building).
 - ii. The figure shows no telephone in the south building.

6. Training - P Page 32, the **Outline of Training Program** (Table 6.1-1) does not appear to contain a number of topics such as:

- a. Hazardous waste permit conditions and compliance.
- b. Hazardous waste storage tank and container regulations.
- c. Used Oil training.
- d. Universal Waste training.
- e. Manifests.
- f. Recordkeeping.
- g. Review of hazardous waste determinations, especially with sales and customer service representatives (Parts 261 and 268 compliance).
- h. Recognition of the different wastestreams (e.g., used oil, combustibles, ignitables, etc.) for drivers who consolidate drums. Drivers must be able to screen oil to ensure they are not accepting used oil mixed with flammables or combustibles.

7. Waste Analysis Plan (WAP)

- a. The WAP does not contain procedures for wastes that are not part of the AR such as:
 - i. Branch-generated liquids and solids.

- ii. Naptha-based drycleaning wastes.
- iii. Antifreeze.
- iv. Retain samples for used oil. Include procedures you sent to Roger Evans in your November 18, 2015 e-mail.
- v. The AR does not distinguish between automobile parts washers and aerospace/industry parts washers. The AR is not representative of all wastestreams generated by the industrial sectors. DEP has found consistent failures for metals in from parts washer from the aerospace/industry.
- vi. The table of wastes does not distinguish between spent parts washer solvent vs. still bottoms or other wastes generated from System One distilling parts washers. Does Safety-Kleen have data characterizing the still bottom material? Is this sampled as part of the Annual Re-characterization program?
- b. The WAP does not contain procedures for compliance with Part 279.43(b) regarding classification of mixtures of materials with different USDOT hazard classes.
- c. Page 1: The table identifying the “Permitted/Site Generated Wastestreams” is different than Table 5.1-1 “Permitted/Transfer/Site Generated Waste” located in the Contingency Plan, and both of these tables are inconsistent with Part I.D.3 “Process-Codes and Design Capacities.” These tables must be consistent throughout the application. Specifically for the WAP, the non-perchloroethylene (naphtha) wastestream is missing from this table.
- d. Pages 3 and 4 do not include discussions on “Dry-cleaning waste (non-perchloroethylene)” that are identified as a wastestream on Table 5.1-1 “Permitted/Transfer/Site Generated Waste”. Non-perchloroethylene dry-cleaning waste is not part of the AR.
- e. Page 4, **Wastes Resulting from Paint and Thinner Service**: The first sentence should probably read “Paint wastes consist of Safety-Kleen...resulting ~~for~~ from cleaning...”
- f. Page 5: Discuss the procedure used to characterize the Used Oil/Oily Water Retain samples that are disposed of as hazardous waste. Include how and where samples are taken, the sampling device(s), EPA SW-846 analytical methods, recordkeeping and how this information is used for shipping the waste off as a hazardous waste.
- g. Page 5: It would be appropriate to note that the SAA noted in the *Site Generated Spent Aerosol Cans* is SWMU-19.
- h. Page 5: It would be appropriate to include discussions on other types of waste that Safety-Kleen manages such as batteries, mercury-containing lamps/devices and used antifreeze.
- i. Page 6, Prescreening of Customers
 - i. The information provided to generators from Safety-Kleen should be included as an attachment in the WAP.
 - ii. Prescreening of pesticides, herbicides or pharmaceuticals from the aerospace/industrial customers must be included.
- j. Page 6, Qualitative/Visual Analysis: It would be appropriate to note that every waste pickup goes through the Qualitative/Visual Analysis as is noted at the bottom of page 10.
- k. Page 7, last sentence in number 3. How does Safety-Kleen determine that there is a high density solvent in the bottom of a container using only a visual inspection (especially if the color is normally brown or black appearance)?
- l. Page 8, first paragraph, suggest: “...on all inbound bulk waste solvent deliveries.”
- m. Page 11 **Additional Requirements for Wastes Generated Off-Site**: Describe management processes if additional waste codes are identified by the generator.
- n. Page 12 **Spent Solvent and Dioxin-Containing Waste**

- i. There is no “268.2(f)(1)”. Remove and insert another reference if another was intended.
- ii. The perchlorethylene treatment standard for *wastewaters* is 0.056 mg/l. Also, Safety-Kleen does manage some solids, e.g., debris.
- iii. The treatment standard for perchlorethylene non-wastewaters is 6.0 mg.kg.
- o. Page 12, *Listed Waste*, last sentence. It appears that verbiage is missing from the sentence after “LDR”. Perhaps the insertion of “paperwork” or something similar was intended?
- p. Page 13, ***Characteristic Wastes***. The treatment standards for D006 (cadmium) and D007 (chromium) are 0.69 mg/l and 2.77 mg/l for wastewaters.
- q. Page 14. The second section states “None of Safety-Kleen Tampa’s permitted wastes are shipped to a Subtitle C facility.” Your application repeatedly states that wastes are transported to a permitted Safety-Kleen or Clean Harbors TSDF.
- r. Page 14, last sentence: References to Part 265 requirements should be eliminated.
- s. Exhibit C-2 *AR Sampling Location Map*. Three Florida facilities are identified on the map but not in the legend. It appears that the Boynton Beach facility should be added to the legend (or deleted from the map).
- t. Exhibit C-4 *Sample Testing Protocol*
 - i. “Aqueous Brake Cleaner” is not a waste included in Table 5.1-1 Permitted/Transfer/Site Generated Waste.
 - ii. There are many updates to EPA Methods. Include the most recent updates: EPA SW-846 Methods 1010A, 9045D, 6010D, 7470A, 7471B, 8260B and 8270D.

8. Part II.B Containers

- a. Page 2: A figure illustrating the piping, fire water tank and pump house for the fire containment system should be included in this section.
- b. Page 4, last paragraph: Explain in more detail, under what isolated instances are special waste segregation needed? Explain how and where these “special” wastes managed.
- c. Figure 8.1-1 should label the North Building and South Building.
- d. Figure 8.1-3 must include a north arrow and scale.

9. **Part II.C Tank System-** Page 3 and Figure 9.1.1: The tank system drawings in this section and in the contingency plan should include diagrams of all above ground piping. In addition, this section should more clearly show which joints are threaded vs. welded, and show that any piping joint outside of secondary containment is welded as stated in the second paragraph of page 3. The secondary containment system design for the ancillary equipment connected by threaded joints is not included in this section. Above ground piping with welded joints that is inspected daily is exempt from the secondary containment requirements per 40 CFR 264.193(f)(2). Please compare the diagram in this section to Figure 11.1-1, showing a threaded elbow at (1). Is this elbow located within secondary containment? If not, does this piping comply with 40 CFR 264.193(f)(4)?

10. Closure Plan

- a. Page 2: Please check the dimensions of the North Building. This section states that it is a 40’x 30’ area but if you use the scale in Figure 8.1-2 and/or Figure 8.1-1, the dimensions are approximately 68’ by 55’.
- b. Also, please check the dimensions for the south building storage areas (compare with Figure 8.1-1)
- c. Under 2. Maximum Inventory of Wastes, the Containerized Waste listed in this section

appears to include only the non-flammable product and/or waste within the north and south building storage areas. The total capacity of the flammable storage area of 12,749 gallons was not included. Please explain or revise.

11. Part II.S

- a. Part II.S. Air Emission Standards, pages 6 and 8: 40 C.F.R. Part 265 is occasionally referenced. This should be changed to Part 264 as noted elsewhere in this section.
- b. Part II.S. Air Emission Standards, page. 8: This section reads, "The most recent tank assessment was completed in May/June 2011." Is this the last time the fixed roof and closure devices of the tank were inspected? Tank integrity inspections may occur every ten years based upon what a qualified Professional Engineer believes is adequate for the tank. However, air emission inspections must be completed more frequently. Per 40 C.F.R. 264.1084(c)(4)ii, the fixed roof and closure devices of tanks should be inspected every year. Table II.2-1 of your renewal application indicates that the tank should comply with Tank Level I requirements and be inspected at least once a year. The information contained in Appendix D of the renewal application also indicates that the tank is inspected yearly as part of the Subpart CC requirements. Please clarify or revise this section.

12. Appendix A - Include a photograph of the piping from the wet dumpsters to the bridges.

13. Appendix C, Containment Calculations - Tank Containment, page 3 of 4. The units for the volume of the largest tank should be in ft³, not gallons. This comment was previously made in 2011 with a revised calculation page submitted in August of 2011. The revised calculation page was not submitted with the latest renewal application.