

## Thursby, Kim

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**From:** Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>  
**Sent:** Tuesday, April 04, 2017 9:35 AM  
**To:** Epost HWRS (Shared Mailbox)  
**Subject:** RE: Safety-Kleen Systems, Inc.-Tampa; FLD980847271; Safety-Kleen comments dated March 22, 2017 to the draft operating permit renewal

Received.

Thank you

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**From:** Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)  
**Sent:** Monday, April 03, 2017 1:59 PM  
**To:** Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>  
**Cc:** Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@dep.state.fl.us>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'Merizalde.carlos@epa.gov' <Merizalde.carlos@epa.gov>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Perrigan, Glen <Glen.Perrigan@dep.state.fl.us>; Evans, Roger <Roger.Evans@dep.state.fl.us>; Fellabaum, Pamela <Pamela.Fellabaum@dep.state.fl.us>; Vaughn, Richard <Richard.Vaughn@dep.state.fl.us>; White, John <John.White@dep.state.fl.us>; Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>; 'bob.fox@erm.com' <bob.fox@erm.com>; Hansen, Mark E <Mark.Hansen@safety-kleen.com>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>  
**Subject:** Safety-Kleen Systems, Inc.-Tampa; FLD980847271; Safety-Kleen comments dated March 22, 2017 to the draft operating permit renewal

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](mailto: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](http://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

Ryan E. Matthews  
Interim Secretary

April 3, 2017

Mr. Jeff Curtis  
EHS Manager  
Safety-Kleen Systems, Inc.  
5610 Alpha Drive  
Boynton Beach, Florida 33426  
[Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)

Re: Safety-Kleen Systems, Inc. FLD980847271 DEP Application No.: 34744-HO-007,  
Safety-Kleen comments dated March 22, 2017 to the draft operating permit renewal

Dear Mr. Curtis:

The Department received, via e-mail dated March 22, 2017, comments on the draft permit. Your questions are reiterated and followed by the Department's response.

If you should have any questions, please contact me at 850-245-8787 or via email at [bryan.baker@dep.state.fl.us](mailto:bryan.baker@dep.state.fl.us).

Sincerely,

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

Bryan Baker, P.G., Administrator  
Hazardous Waste Program and Permitting

BB/mdr

cc with enclosure:

Brian Bastek, EPA Region 4, [Bastek.Brian@epa.gov](mailto:Bastek.Brian@epa.gov)  
Carlos Merizalde, EPA Region 4, [Merizalde.Carlos@epa.gov](mailto:Merizalde.Carlos@epa.gov)  
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Mr. Jeff Curtis

April 3, 2017

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Beth Knauss, DEP Southwest District, [elizabeth.knauss@dep.state.fl.us](mailto:elizabeth.knauss@dep.state.fl.us)

Robert W. Fox, ERM, [bob.fox@erm.com](mailto:bob.fox@erm.com)

Mark Hansen, Safety-Kleen, [mark.hansen@safety-kleen.com](mailto:mark.hansen@safety-kleen.com)

**ENCLOSURE**

**Safety-Kleen Systems, Inc. FLD980847271**

**DEP Application No.: 34744-HO-009**

**Safety-Kleen comments dated March 22, 2017 to the draft operating permit renewal**

Safety-Kleen's comment/question is reiterated (in **bold**) and followed by DEP's response. Please note that you were previously given the opportunity to address comments 2, 3 and 4 in Department letters dated July 20, 2016 (First Request for Additional Information (RAI)) and December 12, 2016 (Continued Use Program).

In addition, the January 13, 2015 Definition of Hazardous Waste (FR Vol. 80, No. 8, 1694-1814) discusses your issue in its preamble.

**1. Page 16 of 40, #5. a. The Permittee is liable for waste profiles supplied to generators. We have commented on this item in previous permit renewals, and the Department agreed to remove this statement.**

DEP Response:

This condition has been removed although it still applies.

**2. Page 24 of 40, #2. a. The CUP solvent must not exhibit a hazardous characteristic (as defined in part 261 subpart C) that analogous products do not exhibit. We ask that the Department clarify what it believes is an analogous product to the CUP solvent.**

DEP Response:

Analogous means that the substitute material has the same value and serves the same function as the virgin material it is replacing including similar physical and chemical properties (See January 13, 2015 Federal Register, Vol. 80, No. 8, page 1725).

**3. Page 24 of 40, #2. b. The concentrations of any hazardous constituents found in Appendix VIII of part 261 that are in the CUP solvent must be at levels that are comparable to or lower than those found in analogous products or at levels that meet widely-recognized commodity standards and specifications (where the commodity standards and specifications include levels that specifically address those hazardous constituents). Again, we would ask that the Department clarify what it believes are analogous products to the CUP solvent.**

DEP Response:

See previous response.

**4. Page 24 of 40, #5. a. iii, and Page 25 of 40, #6. a. Samples must be analyzed for hazardous constituents found in Appendix VIII of part 261 that would ordinarily result from the customer's normal part's washing activities. Appendix VIII contains an extensive list of hazardous constituents. We would ask that the**

Mr. Jeff Curtis

April 3, 2017

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**Department clearly define what hazardous constituents it would require the CUP solvent to be analyzed for.**

DEP Response:

The Department would require that hazardous constituents found in Appendix VIII of part 261 *that would ordinarily result from the customer's normal part's washing activities* be tested. Because Safety-Kleen presumably services a variety of customers and industries in its CUP, it is not possible for the Department to provide a comprehensive list. The list would be, to a certain degree, industry-specific.

However, as an example, because metal parts are cleaned at shops doing automotive repairs, metals would be one group of hazardous constituents reasonably expected to be in the CUP solvent from automotive repair shops.