

Thursby, Kim

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Monday, June 19, 2017 1:54 PM
To: Epost HWRS
Subject: RE: Safety-Kleen Systems, Inc.; FLD 984 167 791; First Request for Additional Information (RAI)

Received.

Thank you

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS
Sent: Wednesday, June 14, 2017 9:16 AM
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>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Winston, Kathy <Kathy.Winston@dep.state.fl.us>; 'bob.fox@erm.com' <bob.fox@erm.com>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>
Subject: Safety-Kleen Systems, Inc.; FLD 984 167 791; First Request for Additional Information (RAI)

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

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

June 14, 2017

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

**Re: First Request for Additional Information (RAI)
Palm Beach County-Hazardous waste
Safety-Kleen Systems, Inc.
FLD 984 167 791
Operating Permit No. 49625-010-HO**

Dear Mr. Curtis:

Thank you for your application for Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 49625-010-HO to the application. A Department staff review of the application and supporting documentation submitted on May 23, 2017, 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 attachment and refer to this correspondence in your response.

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, July 14, 2017, 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 merlin.russell@dep.state.fl.us, alerting us that it has been posted.

www.dep.state.fl.us

Mr. Jeff Curtis
June 14, 2017
Page 2 of 6

If you have any questions, please contact Merlin D. Russell Jr. by telephone at 850-245-8796 or 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 w/Attachment:

Brian Bastek, USEPA Region 4, bastek.brian@epa.gov

Carlos Merizalde, USEPA Region 4, Merizalde.carlos@epa.gov

Dawn Cinquino, DEP Headquarters, Dawn.Cinquino@dep.state.fl.us

Kathy Winston, DEP Southeast District, Kathy.Winston@dep.state.fl.us

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

Attachment: List of Requested Information

Facility Name: Safety-Kleen Systems, Inc.

Facility ID: FLD984167791

DEP Application No.: 49625-010-HO

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. Page 1: Under the Description of Facility Operation, a brief description of waste oil is omitted and should be included in length and scope, like the other waste streams.
3. Page 3: Antifreeze is not included on the list of FRS wastes.
4. Page 5, paragraph 1: At least one figure must identify the battery storage area.
5. Part I.D.3 Process Codes and Design Capacities:
 - a. The application indicates that D003 is received as transfer waste. This waste code (and D002 if it is received as a transfer waste) must be added to this table and to the 8700-12FL.
 - b. 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?
6. Part II.A General, 2. Financial Assurance for Closure (Cost Estimates-Table 1):
 - a. Part 2. Mobilize to Site and Prepare for Closure:
 - i. Under Assumptions, a gallon value is not provided for the waste mineral spirits tank. A full tank should hold 15,000-gallons; however, the tank should not be fuller than 95% of capacity (hence, 14,250-gallons may also be used). We note that the calculations used the correct figures so no action is needed.
 - ii. Under Subcontractor Costs:
 1. Under Transport waste mineral spirits to a TSD for treatment/disposal: Assumption should be 3 tanker trailers, not two, if each can carry a maximum load of 5,000-gallons; and 15,000-gallons instead of 12,000-gallons. However, we note that the calculations use the correct figures. No action needed.
 2. Under Transport drums to TSD for Treatment/Disposal, a reference of "ECT 2004" is provided. Is this reference for the cost per drum? As that reference is 13 years ago, please update this figure to 2017 values. Revise as needed.

- b. Parts 3 and 5 - Please review the length of time decontamination will require for the storage tank and container storage area. Based on the rate per hour and the square footage provided, decontamination may take longer than assumed. Please review and revise your cost estimates as needed.
7. Contingency Plan
- a. Page iii: Safety-Kleen's July 30, 2012 Safety-Kleen response to DEP's Notice of Deficiencies dated June 20, 2012 indicated that formal agreements would be the neighboring school (see snapshot below). Were agreements reached and if so, they should be included in the CP.

FDEP Comments #6.1: In accordance with 40 CFR 270.32(b)(2), we request that the page containing Safety-Kleen emergency coordinators be provided to the adjacent school for health and safety issues. We also request that Safety-Kleen enter into an agreement with the school and school board concerning a notification process in the event that the Safety-Kleen facility requires evacuation. Safety-Kleen should retain documentation in the operating record that the information was provided to both entities.

SK Response: Safety-Kleen will contact the Boynton Beach Community High School and Palm Beach County School district in order to provide the requested information to both entities. In addition SK will discuss and make a formal agreement that satisfies Safety-Kleen, Boynton Beach Community High School, and the Palm Beach County School District in the event that the SK Boynton Beach facility requires evacuation. This information will be provided to the Department when an agreement is reached.

- b. Page 8, **Inspection of Security Equipment**. Figure 5.2-1 only includes weekly inspection items.
 - i. Provide a checklist for daily inspection items.
 - ii. Include the frequency for use of the "CO Safety Security Inspection" checklist.
 - iii. Ensure that the checklist includes that inbound and outbound containers have not exceeded the 72-hour period for unloading or shipping.
 - iv. Include inspection of above-ground piping.
- c. Page 17:
 - i. The CP should include discussions on the above-ground piping. Also, include a figure that shows the locations of the above-ground piping.
- d. Page 22: Under **Tank Area**: Figure 5.6-5 should be revised to show the location of the shallow drainage trenches.
- e. Page 24 **Emergency Response Equipment and Communication**: Figure 5.6-1 does not show the location of first-aid kits or spill equipment noted in the text. The locations should be added to Figure 5.6-1.
- f. Page 25: The first paragraph indicates certain equipment will be tested when *necessary*. This is inconsistent with Table 5.2-1 that contains the inspection schedule for safety equipment.
- g. Page 28, **Hurricane Watch**: We'd recommend insertion of language, similar to the Tampa application, stating that in accordance with Safety-Kleen's internal guidance, a current list of employees and contact information is kept on hand at the facility.
- h. Figure 5.1-1 has "Used Antifreeze" written on top of the transfer area. "Used

Antifreeze” must be removed.

- i. Table 5.6-1 Emergency response Equipment
 - i. Include the fire extinguisher located in the storage tank building.
 - ii. The “Emergency Equipment Area” (Table 5.6-1) should be identified on Figure 5.6-1.
 - iii. There are inconsistencies with Table 5.8-1 Description and Uses of Emergency Equipment. Ensure that the lists of items and location(s) of equipment are consistent. *Some* inconsistencies include:
 1. Table 5.8-1 can reference Figure 5.6-1 Locations of Emergency Equipment, for fire extinguishers, because the fire extinguishers are located in areas, such as the office, other than points where solvent is transferred.
 2. Absorbent materials are located in “Loading/Unloading Area/Warehouse” and “Emergency Equipment Area.” It is unclear if these are the same or different locations.
 3. Air purifying respirators are located in “Employee Lockers” and “Emergency Equipment Area.”
 4. Table 5.6-1 includes boots but Table 5.8-1 does not.
8. Waste Analysis Plan
 - a. Page 3, first paragraph: The WAP does not contain procedures for assigning waste codes to the Branch-generated liquids and solids. Explain how waste codes are assigned for these wastes.
 - b. The explanations provided in Safety-Kleen’s August 26, 2016 First Request for Additional Information (items 7.a.v and vi) for the Safety-Kleen Tampa renewal should be included in the WAP as they clarify previous questions associated with management of wastestreams generated by the industrial sectors and the distillation oil/sludge.
 - c. Exhibit C-2 is, in part, illegible. Also, submit a more recent figure unless the “2003-2013” is the most recent.
9. Part II.B Containers
 - a. Pages 3 and 4: According to your application, oxidizers could be stored in the transfer area. Oxidizers are considered D003 wastes. D003 is not included on the 8700-12FL Form. The 8700-12FL form will need to be updated or D003 wastes will not be allowed on site.
 - b. Page 3: A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device (264.177(c)). Your application must explain how staging of the oxidizers meets these requirements.
10. Part II.C Tank System
 - a. 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 threaded connectors at (23) through (26). Are these connectors located within secondary containment? If not, does this piping comply with 40 CFR 264.193(f)(4)?

- b. Page 8, Repair or Closure: Reports containing engineering certification of major repairs must be placed in the operating record and maintained until closure of the facility, per 40 CFR 264.196(f).

11. Part II.K Closure Plan

- a. Page 1: In the third sentence, the plan mistakenly refers to the Tampa facility.
- b. Page 2: The last sentence (continuing on to page 3) should move “petroleum constituents” to a more appropriate part of the sentence [As written, “The rinsate samples will be analyzed by EPA Method 6010 for ~~petroleum constituents~~, the eight RCRA metals and nickel,...”].
- c. Page 5, Concrete Containment System: Although final soil sampling locations will be determined by DEP and Safety-Kleen, we suggest adding, as item 3, the area outside the secondary containment where rainwater is discharged (See discussion in the Contingency Plan, page 22).
- d. Page 6, Concrete Containment System: The plan states, “Prior to demolition of the perimeter walls, one representative composite sample of the construction materials will be collected and submitted for analyses of metals (by TCLP) and organics.” This composite sample does not appear to be accounted for in the Cost Estimates. Please review and revise as appropriate.

12. Miscellaneous grammatical and typographic errors:

- a. Part II K. Closure Plan, page 2: Extra word (“container”) in second line from the bottom of the page.
- b. Table 11.2-2: Control Option for Return/Fill Area is denoted by “!!”. The Department understands that you meant “11”.
- c. Table 11.2-3: Extra letter (“n”) in the header “Containers”.