From: Curtis, Jeffery S
To: Russell, Merlin

Cc: Blandin, Norva; Cinquino, Dawn
Subject: RE: SK Medley questions

Date: Wednesday, September 27, 2017 5:49:36 PM

Merlin,

The 1/30/17 inspection report completed by Kathy notes the Frac tank and containment to the west of the main building, but I believe that is just a mistake as the west of the main building would be the front parking lot. When she inspected the facility the Frac tank had just been delivered by Clean Harbors and setup in a containment structure that was not sufficient for the capacity of the tank. We did order a new containment structure and are now in the process of setting it up to move the Frac tank into it at the northeastern paved portion of the facility. The facility is also still in the process of having downed trees cleared out from Hurricane Irma that fell all along the eastern fence line and into the parking lot. Once moved it will be staged in containment at the northeastern corner as shown in the permit application figures.

Thanks, Jeff

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]

Sent: Wednesday, September 27, 2017 9:25 AM **To:** Curtis, Jeffery S < Jeff. Curtis@safety-kleen.com>

Cc: Blandin, Norva <Norva.Blandin@dep.state.fl.us>; Cinquino, Dawn

<Dawn.Cinquino@dep.state.fl.us>
Subject: RE: SK Medley questions

...and another question. DEP's January 31, 2017 Inspection Report notes the following:

To the west of the main building is a portable secondary containment for a vacuum trucks to use to collect solids that can't be easily transferred to the oily water tank. This containment was questionable as the sides were sagging at points and there was a stop were grass had grown through the side of the containment wall. This situation doesn't meet the requirements of secondary containment and the facility was told to order a new one. The facility manager could show the inspector a purchase order documenting the company's actions prior to the inspection to remediate the issue.

This sounds like another SWMU, or could it be the frac tank at the *northeastern* portion of the facility (report says west of the main building)? Any thoughts?

merlin

PS I am ccing folks who are part of the review so they can follow along.

From: Curtis, Jeffery S [mailto:Jeff.Curtis@safety-kleen.com]

Sent: Tuesday, September 26, 2017 1:34 PM

To: Russell, Merlin < Merlin.Russell@dep.state.fl.us >

Subject: RE: SK Medley questions

I believe the warning signs are in both English/Spanish, but will confirm. If not, they will be ordered and posted in both. Yes, Medley has a high percentage of residents that speak Spanish first. This includes most of the employees at the branch.

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]

Sent: Tuesday, September 26, 2017 1:31 PM

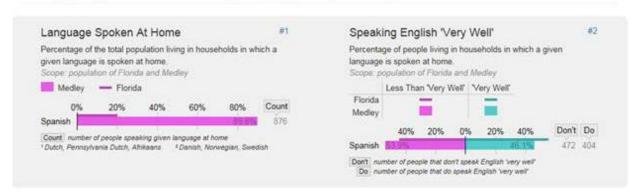
To: Curtis, Jeffery S < <u>Jeff.Curtis@safety-kleen.com</u>>

Subject: RE: SK Medley questions

I just don't want your warning signal to be confused with the security signal. If they were the same, people would probably ignore it. The three long blasts would work. You can decide. I'll frame a comment in the RAI giving you leeway to come up with something. I'm roughly half way through and don't have many comments.

One question that came up was whether or not your warning signs were also in Spanish? Our district inspector indicated a high percentage of people in Medley that spoke Spanish. I did some googling on languages spoken in Miami-Dade County and found this:

Languages in Medley, Florida (Town)



Saw your note Re: no proposed changes to the CP because of Irma. That's good.

merlin

From: Curtis, Jeffery S [mailto:Jeff.Curtis@safety-kleen.com]

Sent: Tuesday, September 26, 2017 1:15 PM

To: Russell, Merlin < Merlin.Russell@dep.state.fl.us >

Subject: RE: SK Medley questions

Hello Merlin,

Regarding sounding the car horn to notify personnel of an emergency I could change the wording to indicate the car horn would be sounded a specific number of times in the event of an emergency, such as 3 long blasts. The facility is at the end of a dead-end road and isolated somewhat.

Notification like this would only apply to anyone in the yard, as the intercom would be able to reach anyone inside the office/return & fill/warehouse building. During the day there are limited personnel at the site (secretary, manager, warehouse personnel, so 4-5 maximum), and they are all trained/aware that the sounding of a car horn may indicate an emergency situation and to stop what they are doing to investigate if this is the case. Your thoughts?

Jeff

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]

Sent: Tuesday, September 26, 2017 8:37 AM

To: Curtis, Jeffery S < <u>Jeff.Curtis@safety-kleen.com</u>>

Subject: RE: SK Medley questions

Jeff, I see later on page 23 where you discuss the alarms so I'm o.k. with my first question.

From: Russell, Merlin

Sent: Tuesday, September 26, 2017 7:56 AM **To:** Curtis, Jeff < <u>Jeff.Curtis@safety-kleen.com</u>>

Subject: SK Medley questions

Jeff,

A good morning to you. I may have more questions as I go through the Part B so don't feel you need to submit a revised page every time I ask for a clarification (unless I need something like the missing figure we discussed yesterday).

In page 11 of your Prevention, Preparedness, CP..., paragraph a., discusses verbal communication or sounding a car horn. Figure 5.6-1 shows the locations of alarms throughout the buildings. Are there alarms in the buildings and shouldn't they be mentioned on page 11 or am I missing something?

Also, how will "...repeatedly sound a card horn..." different from a car whose security has been breached? I've accidently set off the beep, beep, beep on my car before. Just thinking. Thanks,

merlin

Merlin D. Russell Jr.
Professional Geologist III
Hazardous Waste Program & Permitting, Room 330G
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
850.245.8796 (work)

merlin.russell@dep.state.fl.us

Monday-Thursday, 7:00 a.m.-4:30 p.m.; Fridays, 7:00 a.m.-11:00 a.m.

