

Thursby, Kim

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Monday, October 30, 2017 2:32 PM
To: Russell, Merlin
Cc: Thursby, Kim
Subject: RE: Safety-Kleen Systems, Inc.-Medley;FLD984171694; First Request for Additional Information (RAI)

Yes, I have received the RAI. Sorry for the delay and thank you for the reminder.

Jeff

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Monday, October 30, 2017 9:46 AM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Cc: Thursby, Kim <Kim.Thursby@dep.state.fl.us>
Subject: FW: Safety-Kleen Systems, Inc.-Medley;FLD984171694; First Request for Additional Information (RAI)

Jeff, please let Kim know you received the RAI. Thanks.

merlin

From: Thursby, Kim **On Behalf Of** Epost HWRS
Sent: Monday, October 16, 2017 2:32 PM
To: 'Jeff.Curtis@safety-kleen.com' <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>; Andreotta, Jason <Jason.Andreotta@dep.state.fl.us>; Blandin, Norva <Norva.Blandin@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.-Medley;FLD984171694; 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

October 16, 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)
Miami-Dade County-Hazardous waste
Safety-Kleen Systems, Inc.
FLD984171694
Operating Permit No. 56019-011-HO

Dear Mr. Curtis:

Thank you for your application for Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 56019-011-HO to the application. A Department staff review of the application and supporting documentation submitted on September 20, 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, November 16, 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
October 16, 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

Jason Andreotta, DEP Southeast District Office, Jason.Andreotta@dep.state.fl.us

Norva Blandin, DEP Southeast District Office, norva.blandin@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: FLD 984 171 694

DEP Application No.: 56019-011-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. Part I.B.3 indicates that the pickup of used solvent from the tanks occurs about once per week. The Waste Analysis Plan (page 2, item 1.) indicates that the used solvent is removed about every 20 days. Reconcile the discrepancy.
3. Part I.B.5, Page 1: The unit, itself, appears to be outside the 100-year flood plain but the eastern portion of the property is within the 100-year flood plain. The property is surrounded to the north, east and south by areas in flood zones. Submit a legible Figure 2.2-2 or include, in the text, the URL for this flood map. It would also be appropriate, in the text, to point out that Zone AH, surrounding the property and including the eastern portion of the property, includes areas estimated to have flooding between 1-3'.
4. Figure 2.1-1: It would be appropriate (here or elsewhere in the early part of the application) to clarify that the three monitoring wells surrounding the AST area (SWMU-2) are required by Miami-Dade County as part of the Industrial Waste Operating Permit. This information is not presented until much later in Parts II.P and Q.
5. Figure 2.2-1: It is difficult to identify with certainty, the surface water bodies (other than the lakes and canals that are labelled). Additionally, the USGS map is nearly 30 years old, and some of the water bodies have been altered since that time (compare with Google maps). Submit a separate but recent map or figure that clearly identifies surface water bodies (lakes, ponds, retention basin, intermittent streams, etc.) within one mile of the property boundary.
6. Figure 2.2-7: I was unable to verify the source of the wind rose diagram because the URL did not work. However, information located at the Natural Resources Conservation Service (at https://www.wcc.nrcs.usda.gov/ftpref/downloads/climate/windrose/florida/miami/miami_sep.gif) provided a diagram similar to that in the application. You may need to update your source in future submittals.
7. Part II.A.4: Your warning signs and "No Smoking" signs should be in English and Spanish. Revise your application to reflect that signs are in both languages.
8. Preparedness, Prevention, Contingency Plan, and Emergency Procedures...

- a. Page 11 paragraph a., discusses verbal communication or sounding a car horn. How will "...repeatedly sound a card horn..." differ from a car whose security has been breached? You should make changes to this procedure to prevent inadvertent confusion.
 - b. Page 12, first bullet: If Safety Kleen has a contract with a cleanup contractor, the contact information for the company should be identified on page iii. If this is just a general statement about calling in a contractor to assist, then the text is fine as written.
 - c. The reporting section should include the reports required by permit conditions Part I.8 and Part V.2 (SWMU information), if appropriate.
9. Waste Analysis Plan, page 8 (bottom of page). Appendix B, Table "2017 AR Codes and SKDOT.xlsx-National": This table notes that waste codes D022, D030 and D033 were removed from the annual recharacterization between 2016 and 2017. Site-specific procedures for characterization/confirmation of D022, D030 and D033 must be included in the WAP or upon of such wastes, these wastes could be handled as transfer wastes.
10. Part II.B Containers
 - a. Page 1: It would be appropriate to include the dimensions of the container storage area here (49 1/4' x 80').
 - b. Page 2, paragraph 1: Inspections of the sealant are not on the checklist, and should be added to it.
 - c. Page 3, paragraph 2: The 2' aisle space may not be adequate for larger containers¹. In any case, sufficient aisle space must be kept so that containers can be removed or overpacked if leaks or container deterioration are discovered.
 - d. Page 4, paragraph 2: Oxidizers are mentioned as a waste-stream that might be transported to the branch but oxidizers are not identified as a waste-stream on the 8700-12FL form (signed February 6, 2017). If D003 is to be managed at the branch, update the 8700-12FL form.
11. Part II.K Closure Plan
 - a. Page 5, Concrete Containment System: The first bullet states that the upper six inches of soil below the slab will be sampled at two locations; however, more locations are listed. The differences must be reconciled.
 - b. Page 5, third bullet: Mercury is not typically analyzed using EPA Method 6010, and is not recommended for low-level quantitative analysis. A 7000-series analysis is normally used.
12. Part II.P and Q:
 - a. A summary table of the ongoing groundwater monitoring data for SWMU-2 (AST Area)/SWMU-11 (Tank Farm Discharge Area) must be included. The data can be limited to the lifetime of the current permit.
 - b. SWMU-11: The DERM Industrial Waste Operating Permit was not included as noted in the text.

¹ Page 2 of the closure plan notes that containers may include 85-gallon containers and 350-gallon totes.

- c. A SWMU Profile Sheet (attached) must be completed for SWMU-13 Oily Water Frac Tank. As a reminder the discovery of new SWMUs requires notification per specific condition Part V.2.
13. Part II S. Air Emission Standards: Page 8, Level 1 Tank Requirements (40 CFR 264.1084(c)): The first paragraph mentions that the fixed roof and closure devices will be visually inspected. How often are these components visually inspected?
14. Miscellaneous grammatical and typographic errors:
- a. WAP, page 9, paragraph 2, line 4: "...~~below~~ on page 9 10."
 - b. Part II C. Tank System:
 - i. Page 8: There is an extra phrase at the end of the second paragraph that doesn't seem to belong – "system to use".
 - ii. Figure 9.3-1, Return/Fill Station: The word "approximately" is misspelled in Note 2.
 - c. Part II.P, page 1, SWMU-5, first sentence: "is" should be "was".