

Minutes of meeting held 7/12/94.

Florida Department of
Environmental Protection

RCRA PERMITTING -- ROUTING SLIP

FACILITY/ITEM: SAFETY-KLEEN / Brighton

PATS NO: H015 - 195905

<u>TO</u>	<u>NAME</u>	<u>INITIALS</u>	<u>DATE</u>
	SATISH KASTURY		
	MERLIN RUSSELL		
	SHELTON GRAVES		
	AMRISAR KAHAROEDDIN		
	CAMILLE PLAUTZ		
	CINDY SMITH		
	BILL LINN		
	JIM LADNER		
	JOYCE PAPP		
X	DOUG OUTLAW	<u>DO</u>	<u>8/22/94</u>
	JOHN GRIFFIN		
X	HARBHAJAN SINGH	<u>HS</u>	<u>08-24-94</u>
	ALEX ON-WUTAKA		
	RAVI SHAH		
	BHEEM KOTHUR		
	RABIN PRUSTY		
	JANET ASHWOOD		
	DIANE HUNT		
	FRED WICK		
	DAVID MASON		

REQUIRED ACTION & COMMENT: URGENT() ROUTINE()

File

PROJECT MANAGER: Singh

X LOGGED IN

Memorandum

Florida Department of
Environmental Protection

To: File

Through: Satish Kastury
Environmental Administrator

Merlin D. Russell, Jr.
Professional Geologist II
Hazardous Waste Regulation

Douglas Outlaw
Professional Engineer III

From: Camille M. Plautz
Environmental Specialist III
Hazardous Waste Regulation

Date: July 25, 1994

Subject: Safety-Kleen, Altamonte; FLD 097 837 983; Post-closure Permit Application HF02-236952;

Safety-Kleen, Boynton Beach; FLD 984 167 791; Operating Permit HO15-195905

Safety-Kleen, Miami; FLD 980 840 086; Post-closure Permit HF13-207138

Safety-Kleen, Tallahassee (Tharpe Street); FLD 000 776 773; Closure Permit HF37-193175

Safety-Kleen, Tampa (Manhattan Avenue); FLD 049 557 450; Closure Permit HF29-158003

A meeting was held in Tallahassee on July 12, 1994 between representatives of Safety-Kleen and the Department. A list of attendees is attached. A summary of the discussion follows.

MIAMI SITE:

To address Safety-Kleen's concerns about the requirement for background soil sampling included in the final permit, the Department will issue a permit modification deleting specific conditions related to background soil sampling.

Safety-Kleen wants to install the soil vapor extraction (SVE) system along with the groundwater corrective action system. Since the time frame included in the permit for construction of the groundwater corrective action system is almost over, the facility requested a time extension to modify the permit for soil corrective action. The Department will get back to Safety-Kleen on the time extension request.

The modification fee of \$5000.00 was requested in the Department's April 1, 1994 letter to Safety-Kleen. If Safety-Kleen provides the modification fee prior to the Division Director's leaving for vacation, the Department will prepare the intent to issue draft modification for soil corrective action.

BOYNTON BEACH SITE:

Safety-Kleen would like to convert the use of tanks permitted for storage of ethylene glycol to storage of another product. The Department stated that Safety-Kleen would have to submit a permit application (closure plan), to do a major modification to the operating permit. This would be a partial closure.

ALTAMONTE SPRINGS SITE:

During the December 14, 1993 meeting, Safety-Kleen promised to provide an interim measures plan in January, 1994, and a Corrective Action Plan (CAP) with the responses to the First Notice of Deficiencies. The interim measures plan included a 12-week schedule for implementation. The interim measures were approved by the Department on March 18, 1994. Interim measures should have been operational by June 9, 1994; however, a drive-by visit by the Central District on July 1, 1994 indicated nothing had been installed, and a July 7, 1994 telephone conversation between Camille Plautz and John Hodges revealed that Safety-Kleen was ordering equipment.

The promised CAP was not included with responses to the NOD; according to the responses, the CAP would be submitted after the EPA approved the RFI Workplan Addendum. Because of the lack of progress at this site, the Department told Safety-Kleen that responses to the Second Notice of Deficiencies (NOD) are due no later than the end of July. If the permit application is not complete by this time, the Department will consider taking enforcement.

TAMPA (MANHATTAN AVENUE) SITE:

Safety-Kleen is interested in formulating alternate cleanup levels for soils at this site. The facility handed out a draft copy of the cleanup levels, based on Proposed Subpart S guidance. The Bureau of Waste Cleanup has developed alternate cleanup levels for soil and groundwater and will the Hazardous Waste Regulation Section will be meeting to compare these levels with Proposed Subpart S guidance. The lower of the two values will be used.

Safety-Kleen will submit a permit modification to address alternate cleanup levels for soils and groundwater and to extend the closure period. The request to extend the closure period must include justification for extending the closure period. Safety-Kleen requested clarification on the cleanup level, and a quantifiable analytical method for mineral spirits in groundwater and soils. The Department will check with its Quality Assurance Section and the Environmental Services Decision of Region IV EPA and get back with Safety-Kleen.

Safety-Kleen will submit a list of questions requesting clarification on some permit conditions and requirements for Appendix IX sampling.

TALLAHASSEE (THARPE STREET) SITE:

The pilot test results have been received and are under review by Safety-Kleen.

cc: Alan Farmer, EPA/Region IV
Knox McKee, DEP/West Palm Beach
Bob Snyder, DEP/Orlando
Gary Santti, DEP/Tampa
Bill Kellenberger, DEP/Pensacola
Diana Coleman, DER/OGC

01/12/94

SAFETY-KLEEN MEETING

NAME	REPRESENTING	PHONE
Doug Outlaw	DEP/HAZ Waste Permitting	904-488-0300
Diana Coleman	DEP/OGC	904 9219630
John Hodges	Safety-Kleen	813 621 9200
Rick Stebbins	" / ECT	(813) 289-9330
Merlin D Russell Jr	DEP Tallahassee	(904) 488-0800
CAMILLE M. PLAUZ	DEP (TALLAHASSEE)	904 921 9242

VIA TELECONFERENCE:

BILL CRAWFORD

ROGER EVANS

THOMAS MCKEE

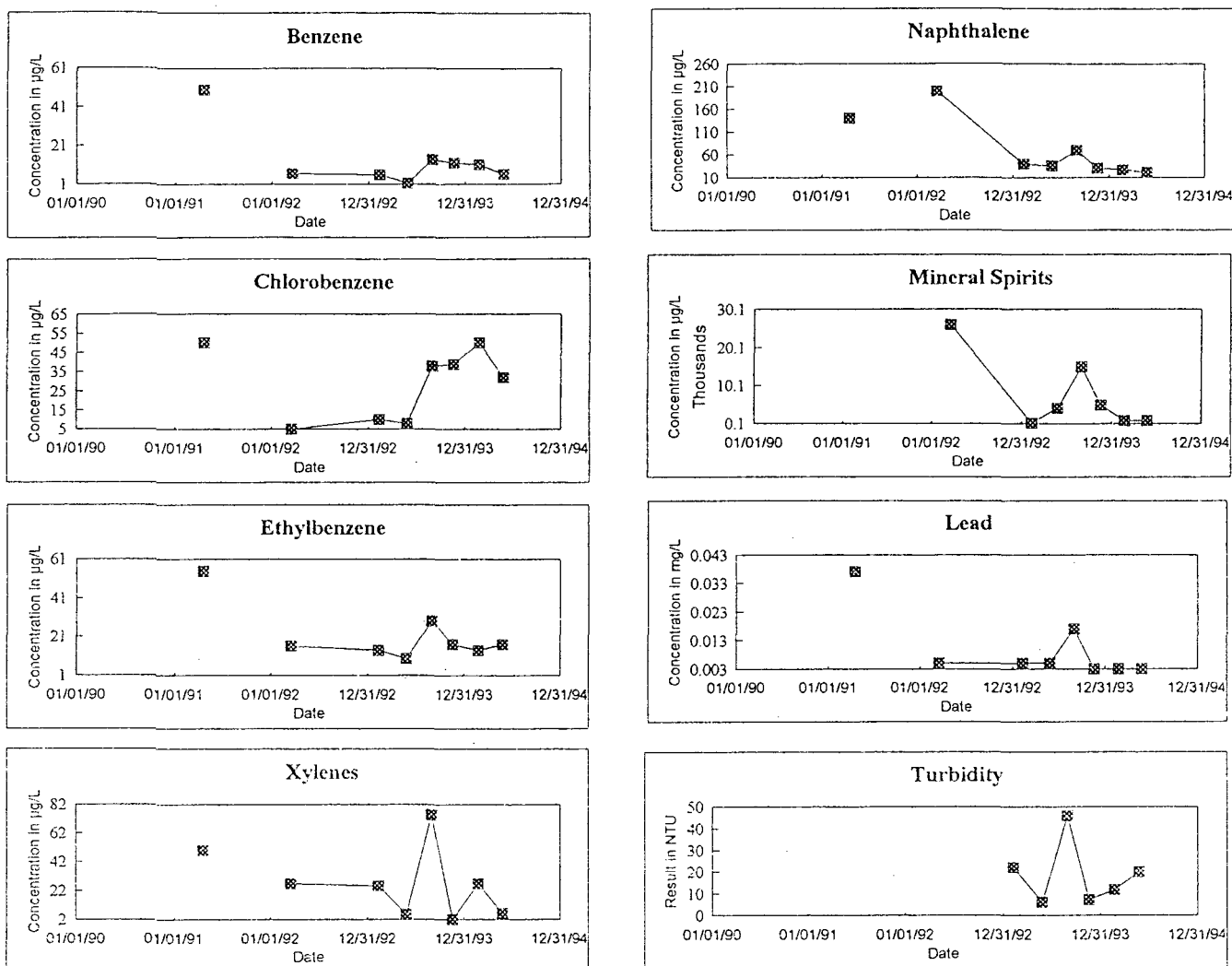
SAFETY-KLEEN CORP. FACILITY
ALTAMONTE SPRINGS, FLORIDA

APPROVAL GRANTED
03/18/94 - DISTRICT

[illegible]

Figure 2. Period of Record Ground Water Quality - POC-2

Safety-Kleen Corporation
Manhattan Avenue, Tampa, Florida



Parameter	Units	POC-2									
		Sample Date									
		06/12/90	04/18/91	05/21/91	03/17/92	02/09/93	05/27/93	08/31/93	11/18/93	02/23/94	05/27/94
Benzene	µg/L		<50		6.5	5.8	1.5	14	12	11	6
Chlorobenzene	µg/L		<50		<5	10	7.8	38	39	50	32
Ethylbenzene	µg/L		55		16	14	9.7	29	17	14	17
Xylenes	µg/L		<50		27	25	5.3	75	<2	27	6
Naphthalene	µg/L		140		<200	40	35	70	30	27	21
Mineral Spirits	µg/L				26000	<250	4200	15000	5000	830	930
Lead	mg/L		0.037		<0.005	<0.0050	<0.0050	0.017	<0.003	<0.003	<0.003
Turbidity	NTU					22	6.1	46	7.3	12	20

Notes: µg/L = Micrograms per liter.
mg/L = Milligrams per liter.
NTU = Nephelometric turbidity units.

Blanks indicate not analyzed.
< indicates parameter was not detected at or above the method detection limit.
Data reported as a less than value are plotted on the graphs as being equal to that value.

Sources: ERM-CAP and (3) quarterly reports.
ECT quarterly reports.

Table 3. Ground Water Remediation System
Summary of All Analytes Detected Since
the February 1994 Quarterly Report*
Safety-Kleen Corporation
Manhattan Avenue, Tampa, Florida

Date Sampled	Analyte	Units	Concentration		
			Influent	Intercarbon	Effluent
4/29/94	Barium	mg/L	0.01	<0.01	--
4/29/94	Chlorobenzene	µg/L	4	<1	--
4/29/94	Ethylbenzene	µg/L	3	<1	--
5/19/94	All analytes below detection limits for both influent and intercarbon				
6/17/94	Benzene	µg/L	1	<1	--
6/17/94	Chlorobenzene	µg/L	8	<1	--
6/17/94	Ethylbenzene	µg/L	3	<1	--

Notes: mg/L = Milligrams per liter.
 µg/L = Micrograms per liter.
 * = Air stripper blower not on.
 -- = Not analyzed.

Ground Water Sample Locations

- Influent (from oil/water separator)
- Intercarbon (from port between the two sets of carbon drums)
- Effluent (from port after the second set of carbon drums)

Source: ECT, 1994.

Table 4. Soil Vapor Summary of All Analytical Results
Safety-Kleen Corporation, Manhattan Avenue, Tampa, Florida
(Page 1 of 2)

Date Sampled	Analyte	Concentration (mg/m ³)	
		Influent	Effluent
1/28/94	Benzene	<2	<2
1/28/94	Toluene	<2	<2
1/28/94	Ethylbenzene	<2	<2
1/28/94	m & p-xylene	<2	<2
1/28/94	o-xylene	<2	<2
1/28/94	MTBE	<2	<2
1/28/94	Total Hydrocarbons	2,200	9.9
2/9/94	Benzene	<2	<2
2/9/94	Toluene	<2	<2
2/9/94	Ethylbenzene	<2	<2
2/9/94	m & p-xylene	<2	<2
2/9/94	o-xylene	<2	<2
2/9/94	MTBE	<2	<2
2/9/94	Total Hydrocarbons	2,800	<2
2/16/94	Benzene	<2	<2
2/16/94	Toluene	<2	<2
2/16/94	Ethylbenzene	<2	<2
2/16/94	m & p-xylene	<2	<2
2/16/94	o-xylene	<2	<2
2/16/94	MTBE	<2	<2
2/16/94	Total Hydrocarbons	1,900	<2
2/24/94	Benzene	<2	<2
2/24/94	Toluene	<2	<2
2/24/94	Ethylbenzene	<2	<2
2/24/94	m & p-xylene	<2	<2
2/24/94	o-xylene	<2	<2
2/24/94	MTBE	<2	<2
2/24/94	Total Hydrocarbons	1,800	<2
3/16/94	Benzene	<2	<2
3/16/94	Toluene	<2	<2
3/16/94	Ethylbenzene	<2	<2
3/16/94	m & p-xylene	<2	<2
3/16/94	o-xylene	<2	<2
3/16/94	MTBE	<2	<2
3/16/94	Total Hydrocarbons	2,100	<2

Table 4. Soil Vapor: Summary of All Analytical Results
 Safety-Kleen Corporation, Manhattan Avenue, Tampa, Florida
 (Page 2 of 2)

Date Sampled	Analyte	Concentration (mg/m ³)	
		Influent	Effluent
4/29/94	Benzene	<2	<2
4/29/94	Toluene	<2	<2
4/94/94	Ethylbenzene	<2	<2
4/29/94	m & p-xylene	<2	<2
4/29/94	o-xylene	<2	<2
4/29/94	MTBE	<2	<2
4/29/94	Total Hydrocarbons	2,400	<2
5/19/94	Benzene	<2	<2
5/19/94	Toluene	<2	<2
5/19/94	Ethylbenzene	<2	<2
5/19/94	m & p-xylene	<2	<2
5/19/94	o-xylene	<2	<2
5/19/94	MTBE	<2	<2
5/19/94	Total Hydrocarbons	2,400	14
6/24/94	Benzene	<2	<2
6/24/94	Toluene	<2	<2
6/24/94	Ethylbenzene	<2	<2
6/24/94	m & p-xylene	<2	<2
6/24/94	o-xylene	<2	<2
6/24/94	MTBE	<2	<2
6/24/94	Total Hydrocarbons	1,000	3.2

Notes: mg/m³ = Milligrams per cubic meter.
 Source: ECT, 1994.

Table 2. Ground Water Quality Summary, May 1994
Safety-Kleen Corporation, Manhattan Avenue, Tampa, Florida (Page 1 of 2)

Sample Location	BG-1	SA-1	SA-2	SA-3	SA-4	DA-1A	DA-4D	DA-5D	POC-1	POC-2	POC-2 Dupe	POC-3	Equip Blank	Equip Blank 1	Trip Blank*
Date Collected	05/26/94	05/26/94	05/26/94	05/26/94	05/26/94	05/27/94	05/26/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94
Parameter, Units															
Hydrocarbons as Mineral Spirits, µg/L	<100	<100	<100	<100	<100	<100	<100	<100	<100	930	910	2600	<100	<100	NA
Methylene chloride, µg/L	<3	<3	<3	<3	<3	<3	7	<3	<3	<3	<3	5	<3	<3	NA
Acetone, µg/L	<10	<10	<10	<10	<10	<10	12	<10	<10	<10	<10	11	<10	18	NA
Carbon disulfide, µg/L	<1	19	3	<1	<1	<1	6	<1	<1	<1	<1	4	<1	<1	NA
1,1-Dichloroethene, µg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	NA
1,1,1-Trichloroethane, µg/L	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	NA
Benzene, µg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1	6	5	3	<1	<1	NA
Tetrachloroethylene, µg/L	<1	<1	<1	8	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	NA
Chlorobenzene, µg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1	32	32	170	<1	<1	NA
Ethylbenzene, µg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1	17	16	52	<1	<1	NA
Xylenes, µg/L	<2	<2	<2	<2	<2	<2	<2	<2	<2	6	6	49	<2	<2	NA
1,2-Dichlorobenzene, µg/L	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	NA
1,3-Dichlorobenzene, µg/L	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	<3	10	<3	<3	NA
1,4-Dichlorobenzene, µg/L	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	57	<5	<5	NA
Naphthalene, µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10	21	23	150	<10	<10	NA
2,4-Dimethylphenol, µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	NA
2-Methylnaphthalene, µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	NA
2-Naphthylamine, µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	NA
Cresylic Acid, µg/L**	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	NA

Table 2. Ground Water Quality Summary, May 1994
 Safety-Kleen Corporation, Manhattan Avenue, Tampa, Florida (Page 2 of 2)

Sample Location	BG-1	SA-1	SA-2	SA-3	SA-4	DA-1A	DA-4D	DA-5D	POC-1	POC-2	POC-2 Dupe	POC-3	Equip Blank	Equip Blank 1	Trip Blank*
Date Collected	05/26/94	05/26/94	05/26/94	05/26/94	05/26/94	05/27/94	05/26/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94	05/27/94
Parameter, Units															
Arsenic, mg/L	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.052	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	NA
Barium, mg/L	<0.01	<0.01	0.01	0.01	<0.01	0.01	2.4	0.01	0.02	0.01	0.01	0.02	0.02	0.02	NA
Beryllium, mg/L	<0.004	<0.004	<0.004	<0.004	<0.004	<0.004	<0.02	<0.004	<0.004	<0.004	<0.004	<0.004	<0.004	<0.004	NA
Cadmium, mg/L	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.025	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	NA
Chromium, mg/L	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	1.5	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	NA
Copper, mg/L	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.19	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	NA
Lead, mg/L	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	0.20	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	NA
Nickel, mg/L	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.27	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	NA
Vanadium, mg/L	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	2.4	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	NA
Zinc, mg/L	<0.02	<0.02	<0.02	0.03	<0.02	<0.02	0.25	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	NA
Sulfide, mg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	1	<1	<1	NA
Turbidity, NTU	0.8	11	2.9	7.7	2.8	11	7800	14	2.5	20	19	52	<0.01	0.1	NA
pH (field), Standard Units	6.7	6.4	6.5	4.1	6.6	8.0	6.2	7.0	6.0	7.0	NA	6.2	NA	NA	NA
Specific conductivity (field), µmhos/cm	280	220	250	100	300	210	180	330	360	420	NA	500	NA	NA	NA
Temperature (field), Degrees Celsius	24	24	26	23	25	26	23	26	23	24	NA	25	NA	NA	NA

Notes: µg/L = Micrograms per liter.
 mg/L = Milligrams per liter.
 NA = Not analyzed.
 µmhos/cm = Micromhos per centimeter.

* Trip blank bottle broke during shipment and therefore could not be analyzed.
 ** Calculated as sum of o, m, and p-cresol.

Source: ECT, 1994.

SAFETY-KLEEN MANHATTAN
INSPECTION CHECK-OFF SHEET
SPECIFIC CONDITIONS II.13 AND III.12
PERMIT HF29-158003

Specific Condition	Due Date	Compliance Date	Comment
III.12	06/30/94	06/23/94	Monthly check-off sheet
II.9	****07/16/94		Closure Certification
III.10	****07/16/94		Submit closure certification
IV.13/IV.14	07/31/94		CAP Quarterly report w/monitoring report
III.12	07/31/94		Monthly check-off sheet
II.13	07/31/94		Quarterly check-off sheet
IV.4	07/31/94		Quarterly Monitoring Report
IV.5/IV.6/IV.12e	08/31/94		Measure water levels/well depths
III.12	08/31/94		Monthly check-off sheet
IV.3/IV.12e	08/31/94		Quarterly sample collection
III.12	09/30/94		Monthly check-off sheet
IV.13/IV.14	10/31/94		CAP Quarterly report w/monitoring report
III.12	10/31/94		Monthly check-off sheet
II.13	10/31/94		Quarterly check-off sheet
IV.4	10/31/94		Quarterly Monitoring Report
IV.5/IV.6/IV.12e	11/30/94		Measure water levels/well depths
III.12	11/30/94		Monthly check-off sheet
IV.3/IV.12e	11/30/94		Quarterly sample collection
III.12	12/31/94		Monthly check-off sheet
IV.13/IV.14	01/31/95		CAP Quarterly report w/monitoring report
III.12	01/31/95		Monthly check-off sheet
II.13	01/31/95		Quarterly check-off sheet
IV.4	01/31/95		Quarterly Monitoring Report
IV.5/IV.6/IV.12e	02/28/95		Measure water levels/well depths
III.12	02/28/95		Monthly check-off sheet
IV.3/IV.12e	02/28/95		Quarterly sample collection
III.12	03/31/95		Monthly check-off sheet
IV.13/IV.14	04/30/95		CAP Quarterly report w/monitoring report
III.12	04/30/95		Monthly check-off sheet
II.13	04/30/95		Quarterly check-off sheet
IV.4	04/30/95		Quarterly Monitoring Report
I.8	05/12/95		Submit renewal application
IV.5/IV.6/IV.12e	02/28/95		Measure water levels/well depths

**SAFETY-KLEEN MANHATTAN
INSPECTION CHECK-OFF SHEET
SPECIFIC CONDITIONS II.13 AND III.12
PERMIT HF29-158003**

Specific Condition	Due Date	Compliance Date	Comment
III.12	05/31/95		Monthly check-off sheet
IV.3/IV.12e	05/31/95		Quarterly sample collection
III.12	06/30/95		Monthly check-off sheet
IV.13/IV.14	07/31/95		CAP Quarterly report w/monitoring report
III.12	07/31/95		Monthly check-off sheet
II.13	07/31/95		Quarterly check-off sheet
IV.4	07/31/95		Quarterly Monitoring Report
IV.5/IV.6/IV.12e	08/31/95		Measure water levels/well depths
III.12	08/31/95		Monthly check-off sheet
IV.3/IV.12e	08/31/95		Quarterly sample collection
	09/24/95		DATE PERMIT EXPIRES
III.12	09/30/95		Monthly check-off sheet
IV.13/IV.14	10/31/95		CAP Quarterly report w/monitoring report
III.12	10/31/95		Monthly check-off sheet
II.13	10/31/95		Quarterly check-off sheet
IV.4	10/31/95		Quarterly Monitoring Report

NOTES:

* Please note that a revised CAR was not submitted. A letter report addressing outstanding requirements of Specific Condition IV.9 was submitted 01/22/93.

** Phase II startup testing (continuous operation) was initiated on 9/21/93; the first CAP quarterly report was submitted by 1/31/94.

*** Schedule for completion of physical closure extended to 05/31/93, per FDER letter to Safety-Kleen dated 03/26/93. As of 05/27/93, physical closure of the container storage area was complete except that soil did not satisfy criteria of Specific Condition II.7b. As of 05/27/93, physical closure of the mineral spirits storage area was complete, with the exception of "implementation" of the soil vapor extraction system due to the proposed and then approved system modification. The City of Tampa issued the construction permit for remedial system installation on 7/13/93 and the soil vapor extraction system was completely installed and operable as of 8/17/93. High water levels precluded operation of the soil vapor extraction system until January 1994.

**** In accordance with the closure schedule (Closure Permit, Attachment B), closure certification (closure activities 7 and 8) must be submitted within 660 days after closure activity 1, which is "Receive Closure Permit from FDER and establish risk-based closure levels." The Closure Permit was received September 24, 1992, and risk-based closure levels have not yet been approved by FDEP. Therefore, the due date for compliance with Specific Conditions II.9 and III.10 is a floating date that will be set once risk-based closure levels are established.

NA = Not applicable.