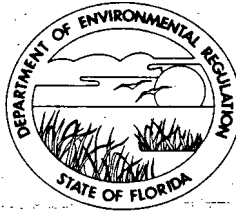


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

March 10, 1987

CERTIFIED - RETURN RECEIPT

RECEIVED

Mr. Stanley Walczynski
Regional Environmental Engineer
Safety-Kleen Corporation
717 Big Timber Road
Elgin, Illinois 60120

MAR 13 1987

Hazardous

Dear Mr. Walczynski:

Safety-Kleen Corporation - Orange Park
FLD 980 847 214
Clay County - Hazardous Waste
Construction Permit Application #HC 10-128082
Second Notice of Deficiency

We are in receipt of your submittal dated January 28, 1987. A review of this submittal revealed that the information which you have provided is not adequate. Proper responses to the following items are required to complete the permit application in accordance with FAC Rule 17-30.220.

1. Exhibit I.E.3-9 does not show that the sealant used to fill the gaps and cracks in the bottom pan and in the rest of the metal shelter will not react with the hazardous waste stored in it. Provide this information. [40 CFR 264.175(b)]
2. The design drawings neither describe the slope of the bottom of the shelter nor do they describe whether all spillage in the shelter will drain to the pan. This information is very important and must be submitted in detail. [40 CFR 264.175(c)]
3. Provide design drawings for the secondary containment system. Also show how accumulated liquids in the containment system will be analysed and removed in as timely a manner as is necessary to prevent overflow. Describe and list the equipment to be used for removal of collected liquids. [40 CFR 264.175(b)(5)]
4. Provide information showing how the run-on into the containment system will be controlled. Also show how the run-off from the metal shelter will be controlled. [40 CFR 264.175(b)(4)]

Mr. Stanley Walczynski
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5. Show how and what temperature will be maintained in the shelter to prevent ignition, fire or explosion. This information must be based on the hottest possible day of the year. Consider that on the hottest day, the open air temperature is approximately 100° to 105°F and the air temperature inside the shelter may reach 130° to 150°F because of the radiant heat effect in a closed metal shelter.
6. Provide engineering evaluation for the structural integrity of the base, considering the maximum drums stored at any one time. [40 CFR 264.175(b)(1)]
7. Provide the design drawings showing adequate aisle space in the metal shelter. [40 CFR 264.173]
8. Your submittal dated January 28, 1987 references Page I.E.4-8, which is not included. Please provide this page with your next submittal.
9. Provide an inspection schedule describing how often monitoring, emergency, safety, operating and structural equipment, and security devices will be inspected. Also include how often the facility and containers will be inspected to check for leaks or cracks. An inspection log or summary including the following must be maintained at the facility:
 - (1) Dates and times of inspections.
 - (2) Name(s) of inspector(s).
 - (3) Observation made.
 - (4) Date and nature of repairs or remedial actions.
[40 CFR 264.15, 264.174]
10. Provide a list of equipment to be kept in this metal shelter for safety and remedial actions. [40 CFR 264.32]
11. Page II-5 of your last submittal dated January 28, 1987, states that the shelter does not meet the 50 foot buffer zone requirement for ignitable waste. Provide documentation of any variance or approval is received from the fire marshal or fire commissioner.
12. The last sentence on Page I.E.4-7a of your last submittal is incomplete. Please provide a new page after correction.

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Page three

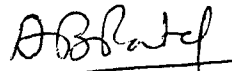
13. During inspection of this facility last month, our staff found that there was no "Hazardous Waste" sign on the tank and that there were no "Danger - Unauthorized Personnel Keep Out" signs on the east and back of the fence. These signs must be posted immediately and maintained as long as the facility operates.

They also found that the front gate was open and there were no security personnel at the gate. 40 CFR 264.14 requires facilities to control entry of persons or livestock onto the active portion of the facility. Please provide information describing what corrective measures are taken and how compliance with this regulation will be maintained.

Please send us four copies of your response to this letter. Failure to provide the required information within thirty (30) days of receipt of this letter may result in denial of your construction permit. Your application will be held in abeyance until the required information is received.

If you have any questions regarding this letter or wish to arrange a conference to discuss your application, please telephone me at (904) 798-4200.

Sincerely,



Ashwin B. Patel
Hazardous Waste Supervisor

BFW

ABP:jf

cc: Satish Kastury
Bob Githens
Ellen C. Jursczak