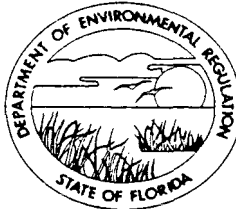


DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ERNEST E. FREY
DISTRICT MANAGER

October 13, 1986

CERTIFIED - RETURN RECEIPT

RECEIVED

Mr. Paul Johnson
Safety Kleen
161 Industrial Loop South
Orange Park, Florida 32073

MAR 09 1987

Hazardous Waste

Dear Mr. Johnson:

Safety-Kleen
Hazardous and Solid Waste Act Amendments of 1984
Clay County - FLD 980 847 214

The purpose of this letter is to inform you that the requirements of the Hazardous and Solid Waste Act Amendments of 1984 apply to your facility and to your RCRA Hazardous Waste permit or permit application that is currently under review. These requirements will be imposed by the Environmental Protection Agency until such time as they have been adopted into state regulations.

The principal area of concern at this time is Section 3004U of the RCRA amendments which requires that RCRA permits require corrective action to clean up any contamination caused by prior releases of hazardous wastes or constituents from solid waste management units, regardless of the time when the waste was placed in the unit.

In order to establish how Section 3004U may apply to your facility we ask that you prepare the information requested on the enclosed form and return it to the state office within 60 days of your receipt of this letter. Your effort to answer all questions completely will help minimize further requests from our office on this matter.

Please contact me at (904)396-6959 if you have any questions concerning this request.

Sincerely,

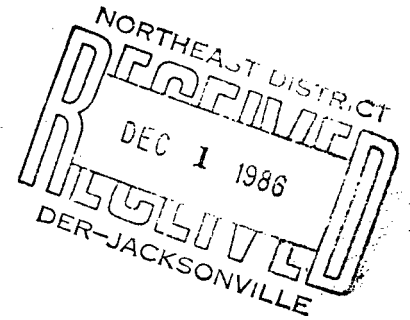
Ashwin B. Patel

Ashwin B. Patel
Hazardous Waste Supervisor

ABP/VGv:jf
Enc.

cc: Satish Kallury
Stanley Walczynski

DOCKET # 13



November 20, 1986
PP 86-158

RECEIVED

MAR 09 1987

Hazardous Waste

Mr. Ashwin Patel
Florida Dept. of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

Subject: Safety-Kleen Corp. 3-079-01
FLD98847214; Orange Park

Dear Ashwin:

Enclosed you will find the completed "Information regarding potential releases from solid waste management units" form for the referenced facility. This submittal is in response to your 3004 information request dated October 13, 1986 to Paul Johnson, manager of the facility.

Please call me if you have any questions, or need additional information.

Sincerely,

Paul Pederson
Environmental Engineer

PP/ber

Enclosure

cc: Paul Johnson

DOCKET # 19

**INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS**

NORTHEAST DISTRICT
RECEIVED
DEC 1 1986
DER-JACKSONVILLE

FACILITY NAME: Safety-Kleen Corp (3-079-01)

EPA I. D. NUMBER: FLD980847214

LOCATION City Orange Park

 State Florida 32073

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	<u> </u>	<u> X </u>
• Surface Impoundment	<u> </u>	<u> X </u>
• Land Farm	<u> </u>	<u> X </u>
• Waste Pile	<u> </u>	<u> X </u>
• Incinerator	<u> </u>	<u> X </u>
• Storage Tank (Above Ground)	<u> </u>	<u> X </u>
• Storage Tank (Underground)	<u> </u>	<u> X </u>
• Container Storage Area	<u> </u>	<u> X </u>
• Injection Wells	<u> </u>	<u> X </u>
• Wastewater Treatment Units	<u> </u>	<u> X </u>
• Transfer Stations	<u> </u>	<u> X </u>
• Waste Recycling Operations	<u> </u>	<u> X </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

N/A

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc)

There is no record or recollection of prior releases at the referenced

facility. There are no current releases.

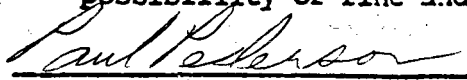
4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

Paul D. Pederson, Environmental Engineer
Name and Title (Typed)

File: Safety Open Permit

Perin

Jan

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KV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

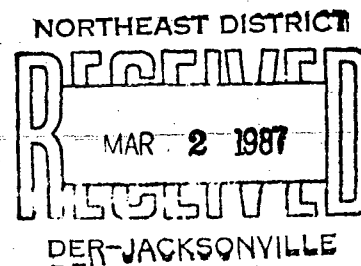
REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 26 1987

4WD-RM

Mr. Robert W. McVety, Administrator
Solid Waste Section
Florida Department of Environmental
Regulation
Twin Towers Office Building
Room 421
2600 Blair Stone Road
Tallahassee, Florida 32301



Re: Safety-Kleen, Orange Park
EPA I.D. No. - FLD 980 847 214

Dear Mr. McVety:

EPA conducted a RCRA Facility Assessment (RFA) at the subject facility on February 11, 1987 and has determined that it is not evident that there has been a prior or a continuing release of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) at the site. Therefore, at this time, Section 3004(u) of the Hazardous and Solid Waste Amendments (HSWA) of 1984 does not apply.

Since, apparently, only the Section 3005(h) waste minimization certification requirement of HSWA applies to this facility, a separate federal permit would not be required, provided the State permit incorporates this requirement. In this case, the State permit would constitute the full RCRA permit.

For facilities where only Section 3005(h) applies, the public notice, the notice of intent to issue, and cover page of the permit should contain the following information:

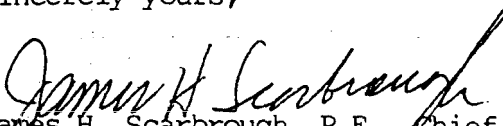
1. EPA has determined that the provisions of 3004(u) of HSWA do not apply; but if new information to the contrary becomes available, the permit may be reopened.
2. The permit incorporates the Section 3005(h) HSWA waste minimization certification requirements.
3. The State permit constitutes the full RCRA permit, and a federal permit is not required to address the provisions of HSWA.

Additionally, the permit should incorporate the waste minimization requirements and a condition for reopening the permit if it is later determined that 3004(u) applies.

We have enclosed recommended wording for inclusion in the public notice, notice of intent to issue, permit cover page and permit conditions.

If you have any questions please contact Mr. Herb Miller, of my staff, at (404) 347-3433.

Sincerely yours,


James H. Scarbrough, P.E., Chief
Residuals Management Branch
Waste Management Division

Enclosure

cc: Ashwin Patel, FDER, Northeast District

Recommended Wording Where Only the Section 3005(h) of
HSWA Waste Minimization Certification Requirement Applies

1. Public Notice and Notice of Intent to Issue

The standard FDER public notice should be used. This would not be a joint public notice since a federal permit will not be issued. The following paragraphs should be included in these two (2) documents:

The Environmental Protection Agency (EPA) and Florida Department of Environmental Regulation (FDER) have determined that there is no evidence of releases of hazardous wastes or constituents from solid waste management units (SWMUs) at this facility. Therefore, at this time, Section 3004(u) of the Hazardous and Solid Waste Amendments (HSWA) of 1984 does not apply. The only provision of HSWA which applies to the facility is the Section 3005(h) waste minimization certification requirement, which has been incorporated into the proposed State permit. Since there are no other provisions of HSWA which affect this facility, the final State permit, if issued, will constitute the RCRA permit required by FDER and EPA.

If new information becomes available indicating that Section 3004(u) of HSWA applies, the permit may be reopened.

2. Permit Cover Page

The paragraphs in No. 2 should also be in the permit cover page(s).

3. Permit Conditions

The permit should include the following specific conditions:

- ✓ a. The Permittee shall be required to certify no less often than annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.
- ✓ b. This permit may be reopened if additional information becomes available indicating that the provisions of Section 3004(u) of the Hazardous and Solid Waste Amendments (HSWA) of 1984 apply to this facility. At that time, this permit may be modified to address the requirements Section 3004(u) of HSWA if the State has been authorized for the provisions, or alternately, the Environmental Protection Agency (EPA) would issue a separate federal permit addressing Section 3004(u) requirements.