

November 4, 1986

RECEIVED

MAR 03 1987

Hazardous Waste

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

RE: Orange Park Service Center (FLD 980847214)  
Operation Permit Application H010-119940

Dear Mr. Patel:

HC10-123082

The enclosed has been prepared in response to your October 9, 1986 notice of deficiency. As we discussed in our telephone conversation of October 17, 1986, Safety-Kleen plans to store paint wastes (F003, F005) in a metal shelter at the Orange Park facility. Currently, the shelter is in place and is operating as a transfer facility only.

A revised form 17-1.207(3) is enclosed and the certification statement will be forwarded to your office as soon as it is complete. In addition, the text has been revised to include paint wastes and the exhibits include a new Site Plan and a diagram of the shelter.

If you have any questions or require further information, please contact me on extension 2246.

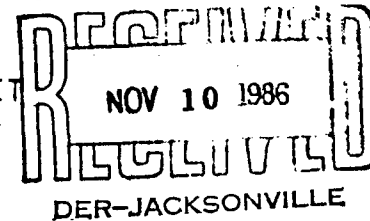
Sincerely yours,

Ellen J. Jurczak, P.E.  
Environmental Engineer/Permits Manager

EJJ/ab

cc: T. Becker, Tampa Reg. Mgr.  
P. Johnson, Br. Mgr. (3-079-01)

APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT  
PART I - GENERAL  
TO BE COMPLETED BY ALL APPLICANTS



Please Type or Print

## A. GENERAL INFORMATION

## 1. TYPE OF FACILITY:

DISPOSAL LANDFILL	<input type="checkbox"/>	LAND TREATMENT	<input type="checkbox"/>	SURFACE IMPOUNDMENT	<input type="checkbox"/>	N/A
STORAGE CONTAINERS	<input checked="" type="checkbox"/>	TANKS	<input checked="" type="checkbox"/>	PILES	<input type="checkbox"/>	SURFACE IMPOUNDMENT
TREATMENT TANKS	<input type="checkbox"/>	PILES	<input type="checkbox"/>	INCINERATION	<input type="checkbox"/>	SURFACE IMPOUNDMENT
THERMAL	<input type="checkbox"/>	CHEMICAL	<input type="checkbox"/>	PHYSICAL	<input type="checkbox"/>	BIOLOGICAL

2. TYPE OF APPLICATION: ☐ TOP ☒ CONSTRUCTION ☒ OPERATION ☐ CLOSURE

3. DATE CURRENT OPERATION BEGAN (OR IS EXPECTED TO BEGIN): 3/1/85

4. FACILITY NAME: Safety-Kleen Corporation 3-079-01

5. EPA/DER I.D. NO.: FLD 980847214

6. FACILITY LOCATION OR STREET ADDRESS: 161 Industrial Loop South, Orange Park, FL

7. FACILITY MAILING ADDRESS: Safety-Kleen Corp., 777 Big Timber Road, Elgin, IL 60120  
STREET OR P.O. BOX CITY STATE ZIP8. CONTACT PERSON: Stanley Walczynski TELEPHONE: (312) 697-8460 X2242  
TITLE: Regional Environmental Engineer, Safety-Kleen Corp., Elgin, IL  
MAILING ADDRESS: 777 Big Timber Road, Elgin, IL 60120  
STREET OR P.O. BOX CITY STATE ZIP

9. OPERATOR'S NAME: Paul Johnson TELEPHONE: (904) 264-2607

10. OPERATOR'S ADDRESS: 161 Industrial Loop South, Orange Park, FL 32073  
STREET OR P.O. BOX CITY STATE ZIP

11. FACILITY OWNER'S NAME: Gordon Burnam TELEPHONE: ( )

12. FACILITY OWNER'S ADDRESS: P.O. Box U Columbia, MO 65705  
STREET OR P.O. BOX CITY STATE ZIP13. LEGAL STRUCTURE: ☒ CORPORATION ☐ NON-PROFIT CORPORATION ☐ PARTNERSHIP  
☐ INDIVIDUAL ☐ LOCAL GOVERNMENT ☐ STATE GOVERNMENT ☐ FEDERAL GOVERNMENT  
☐ OTHER14. IF AN INDIVIDUAL, PARTNERSHIP, OR BUSINESS IS PERFORMED UNDER AN ASSUMED NAME,  
SPECIFY COUNTY AND STATE WHERE NAME IS REGISTERED. COUNTY: STATE:

15. IF A CORPORATION, INDICATE STATE OF INCORPORATION Wisconsin

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C. LAND USE INFORMATION

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1. PRESENT ZONING OF THE SITE? I-A Light Industrial

2. IF A ZONING CHANGE IS NEEDED, WHAT SHOULD NEW ZONING BE? \_\_\_\_\_

3. PRESENT LAND USE OF SITE General Industry

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D. OPERATING INFORMATION

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1. IS WASTE GENERATED ON SITE? ☒ YES ☐ NO LIST THE SIC CODES (4-DIGIT)  
7399 5172 5084 5013

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2. ATTACH A DESCRIPTION OF THE OPERATION INCLUDING (a) A BRIEF DESCRIPTION OF THE NATURE OF THE BUSINESS; (b) A SPECIFICATION OF THE HAZARDOUS WASTE LISTED OR DESIGNATED IN 40 CFR PART 261 TO BE TREATED, STORED, OR DISPOSED AT THE FACILITY; (c) AN ESTIMATE OF THE ANNUAL QUANTITY OF SUCH WASTE; AND (d) PROCESSES USED FOR TREATING, STORING, OR DISPOSING OF HAZARDOUS WASTE AND THE DESIGN CAPACITY OF THOSE PROCESSES.

\*3. ATTACH A COPY OF THE REPORTS OF THE CHEMICAL AND PHYSICAL ANALYSES OF THE HAZARDOUS WASTES HANDLED AT THE FACILITY, INCLUDING ALL INFORMATION WHICH MUST BE KNOWN TO TREAT, STORE, OR DISPOSE OF THE WASTES IN ACCORDANCE WITH §264.13(a).

\*4. ATTACH A COPY OF THE WASTE ANALYSIS PLAN REQUIRED BY §264.13.

5. ATTACH A SCALE DRAWING OF THE FACILITY SHOWING THE LOCATION OF ALL PAST, PRESENT, AND FUTURE TSD AREAS. ALSO SHOW THE TRAFFIC PATTERN INCLUDING ESTIMATED VOLUME AND CONTROL.

\*6. ATTACH A COPY OF THE PROCEDURES USED TO COMPLY WITH §264.12 AND 40 CFR PART 264, SUBPART E (MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING).

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E. FACILITY SECURITY INFORMATION

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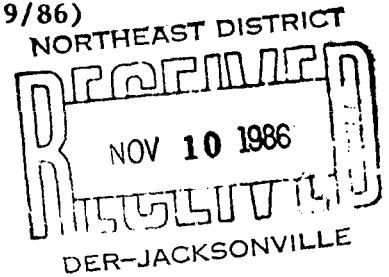
\*1. ATTACH A DESCRIPTION OF THE SECURITY PROCEDURES AND EQUIPMENT REQUIRED BY §264.14.

\*2. ATTACH A COPY OF THE CONTINGENCY PLAN REQUIRED BY 40 CFR PART 264, SUBPART D.

3. ATTACH A DESCRIPTION OF PROCEDURES, STRUCTURES, OR EQUIPMENT USED AT THE FACILITY TO:

- a. MITIGATE EFFECTS OF EQUIPMENT FAILURE AND POWER OUTAGES;
- b. PREVENT HAZARDS IN UNLOADING OPERATIONS (i.e., RAMPS, SPECIAL FORKLIFTS);
- c. PREVENT UNDUE EXPOSURE OF PERSONNEL TO HAZARDOUS WASTE (i.e., PROTECTIVE CLOTHING);
- d. PREVENT CONTAMINATION OF WATER SUPPLIES;

RESPONSE TO SECOND NOTICE OF DEFICIENCY (10/9/86)  
SAFETY-KLEEN CORPORATION  
ORANGE PARK, FL  
FLD980847214



PART I - GENERAL

Section B-3

Comment 1:

Per the requirements of 17-1.207(3) FAC and 40 CFR 270.14(b)(19) we require that you submit statements addressing each of the following for the 1 inch to 2,000 feet map.

- Surface water bodies within 1/4 mile of the facility property boundary
- Surrounding land uses
- Injection wells used by the facility within one mile of the facility property boundaries.
- Drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.
- Intake and discharge structures within one mile (e.g., NPDES outfalls, cooling water intake).

Response 1:

Based on information presented in Exhibit I.B. 3-1 (U.S.G.S. Map) there are no surface water bodies within 1/4 mile of the site. There are no injection wells or intake/discharge structures within 1 mile. To the best of our knowledge, no drinking wells exist within 1/4 mile of the site.

The site lies in an industrial park with surrounding areas zoned I-A, Light Industrial.

Comment 2:

Per the requirements of 17-1.207(3) FAC and 40 CFR (270.14(b)(19) we request that you submit a topographic map showing a distance of 1,000 feet around the facility at a scale of 1 inch to 200 feet. Contours must be shown on the map with interval sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility (e.g., contour intervals of 5 feet if relief is greater than 20 feet or an interval of 2 feet if relief is less than 20 feet). The map should clearly show the following:

1. Map scale and date.
2. Orientation of map.
3. Injection and withdrawal wells both on-site and off-site.
4. Contours sufficient to show surface water flow.

5. Runoff control systems.

Response 2:

A 1" = 200' map extending a distance of 1,000 feet around the facility is attached.

As stated in our response to Comment 1, Safety-Kleen is unaware of any injection or withdrawal wells either on or off site.

0. \* Regarding contours, the 1" = 2000' map indicates that the surrounding area is very flat, such that less than two feet of topographic relief occur per 1,000 feet.

(There are no on site systems specifically intended for runoff control other than the individual containment structures.

Section D-4

Comment 3:

Modify Exhibit I.D.4-2 of your Part B application to include the specific organic compounds and applicable EPA Test Method. [40 CFR 264.13(b)(1)&(2)]

Response 3:

OK Exhibit I.D.4-2 has been modified to list the specific organic compounds identified in our August 12, 1986 response, and applicable EPA test method.

\* Section D-6

Comment 4:

As previously requested, provide a description in regards to your manifesting procedures, from initial generation to final disposition of hazardous waste. Provide copies of manifest used from the customer to the service center and from the service center to the recycling facility. Describe who retains copies of manifests. Clearly show compliance with 40 CFR 264.71 and 264.72(b).

Response 4:

\* As stated in our August 12 response, Safety-Kleen manifests wastes in accordance with procedures promulgated in the 1984 RCRA Reauthorization. Copies are retained by the generator, transporter and storage facility operator, as required.

Comment 5:

As previously requested, provide statements showing compliance with 40 CFR 264.74, 264.75, and 264.76.

Response 5:

(264.74) A copy of the permit and copies of all records and manifests are kept on file at the service center.

(264.75) As stated in our August 12 response, an annual report will be submitted to the FDER.

OK (264.76) In the event that any unmanifested wastes are received at the service center, an exception waste report will be submitted within 15 days as required.

#### Section E-1

##### Comment 6:

OK Since you are applying for an operating permit for this facility, you are required to be in compliance with all applicable 264 regulations at the time of issuance of your permit, therefore the security requirements for the tanks should be addressed. [40 CFR 264.14]

##### Response 6:

Safety-Kleen anticipates that the security fencing will be installed by January 1, 1987.

#### Section E-2

##### Comment 7:

OK The contingency plan must be complete, in itself, and should contain information of immediate value to plant personnel, local authorities and emergency response personnel in the event of an emergency. Submit a complete copy of the plan with each of the following incorporated within the plan:

- NOPE
- A site map (1:200) required under Section B-3, showing evacuation rally points, location of nearest fire hydrant and the site plan showing the layout of the facility.
  - List of all emergency equipment.
  - Procedure necessary to respond to tank spills or leakage.
  - The emergency notification procedures which include DER.
  - The primary coordinator's address and phone number.

OK Provide land owner and Florida professional engineers certifications as required.

##### Response 7:

A site map is attached as Exhibit I.E.2-1a. A list of all emergency equipment is contained in Exhibit I.E.2-10 as revised and transmitted August 12, 1986.

Section I.E.2d has been revised to address a procedure for tank spills.

Exhibit I.E.2-1 had been revised to include the home address and phone of the primary emergency coordinator, and phone for the DER. This information was submitted with Safety-Kleen's August 12, 1986 transmittal. Section I.E.2.b states that agencies on this list are to be notified when there is an imminent or actual emergency.

You should note that the permit has been revised to include storage of paint wastes (F003, F005) in containers. The revised text and exhibits are included with the enclosures. Currently, the paint waste shelter is in place and is functioning as a transfer facility only.

Part I of the permit application has been revised to include construction of this facility and the revised text and additional pages necessary for the permit application are enclosed. The certification statement has been signed by a corporate officer and the owner and has been received by a professional engineer registered in Florida (Phil Parker of Parker Mechanical, Inc.). He will recertify the application after he inspects the paint waste storage shelter. His certification is expected within 14 days.

## KDM company

(512) 333-4011

May 21, 1986

## LABORATORY ANALYSIS

WASTE STREAM: Waste Paint Related Material  
SOURCE: Safety-Kleen 16 gallon drums  
METHOD(S): Dry weight determination  
Dry distillation  
Gas chromatograph

% RECOVERY: 72%

% SOLID: 9%

ANALYSIS:

H <sub>2</sub> O	1%
Acetone	13%
IPA	8%
M-E-K	5%
Lacquer Diluent	4%
MIBK	3%
Toluene	40%
Xylene	20%
EE Acetate	3%
Others	3%
	<u>100%</u>



## KDM company

(512) 333-4011

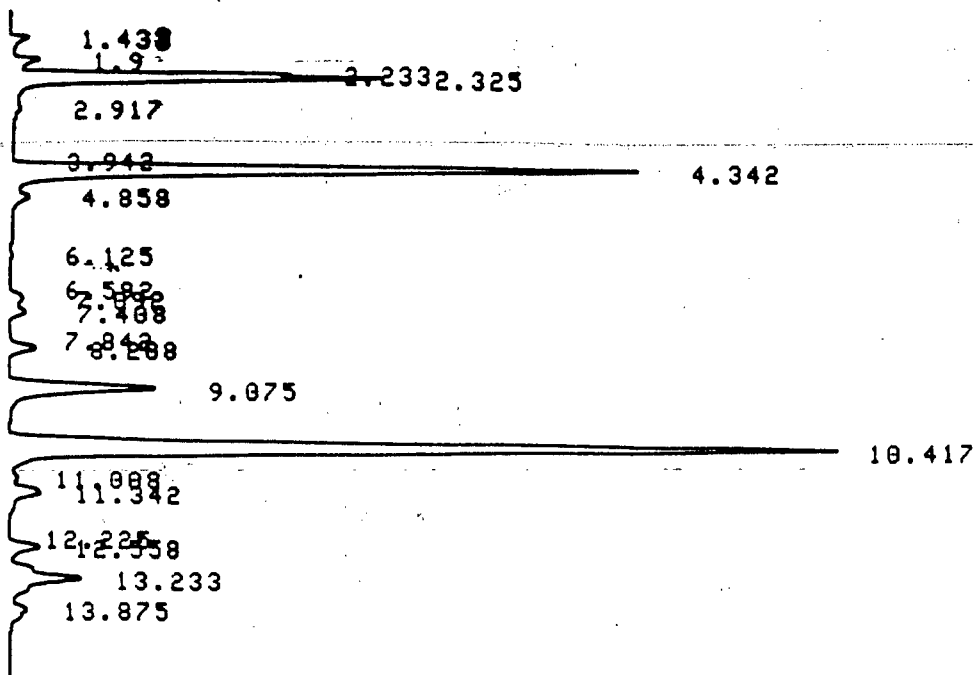
May 21, 1986

## LABORATORY ANALYSIS

WASTE STREAM:	Waste Paint Related Material																			
SOURCE:	Safety-Kleen 5 gallon cans																			
METHOD(S):	Dry weight determination Dry distillation Gas chromatograph																			
% RECOVERY:	90%																			
% SOLIDS:	1 %																			
ANALYSIS:	<table><tbody><tr><td>Water &amp; Methanol</td><td>1.5%</td></tr><tr><td>Acetone</td><td>16%</td></tr><tr><td>M-E-K</td><td>24%</td></tr><tr><td>Lacquer Diluent</td><td>5%</td></tr><tr><td>MIBK</td><td>6%</td></tr><tr><td>Toluene</td><td>39%</td></tr><tr><td>Xylenes</td><td>6%</td></tr><tr><td>Others</td><td><u>2.5%</u></td></tr><tr><td></td><td>100%</td></tr></tbody></table>		Water & Methanol	1.5%	Acetone	16%	M-E-K	24%	Lacquer Diluent	5%	MIBK	6%	Toluene	39%	Xylenes	6%	Others	<u>2.5%</u>		100%
Water & Methanol	1.5%																			
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Others	<u>2.5%</u>																			
	100%																			

ANAL  
SPEED(8)=6  
ANAL 5

85/12/19 16:11:07



PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	2.233	41639	V		4.9381	ACETONE
2	2.325	86066	V		10.1905	ISOPROPYL ALCOHOL
3	4.342	228038			27.0004	METHYL ETHYL KETONE
4	9.075	64574			7.6457	METHYL ISOBUTYL KETONE
5	10.417	364216			43.1243	TOLUENE
6	11.342	14047			1.6632	n-BUTYL ACETATE
7	12.558	10277			1.2169	o-XYLENE
8	13.233	35716			4.2289	m- and p-XYLENE
TOTAL		844573			100	

LACQUER THINNER COMPOSITION  
Safety-Kleen Corp.

A profile of the paint waste is presented in Exhibit I.D.4-5. It will be reanalyzed when the reclaimer to whom it is shipped requests reanalysis or when a change in the use of the product occurs.

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I.D.4.a-4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified if a new waste product is brought in and if sampling and material management methods change.

Monitoring and revision of the plan status is the responsibility of Environmental Department staff at Safety-Kleen Corporate Office in Elgin, Illinois.

KDM company

(512) 333-4011

May 21, 1986

## LABORATORY ANALYSIS

WASTE STREAM: Waste Paint Related Material

SOURCE: Safety-Kleen 16 gallon drums

METHOD(S): Dry weight determination  
Dry distillation  
Gas chromatograph

% RECOVERY: 72%

% SOLID: 9%

ANALYSIS:

H <sub>2</sub> O	1%
Acetone	13%
IPA	8%
M-E-K	5%
Lacquer Diluent	4%
MIBK	3%
Toluene	40%
Xylene	20%
EE Acetate	3%
Others	3%
	<u>100%</u>

## KDM company

(512) 333-4011

May 21, 1986

## LABORATORY ANALYSIS

WASTE STREAM: Waste Paint Related Material

SOURCE: Safety-Kleen 5 gallon cans

METHOD(S): Dry weight determination  
Dry distillation  
Gas chromatograph

% RECOVERY: 90%

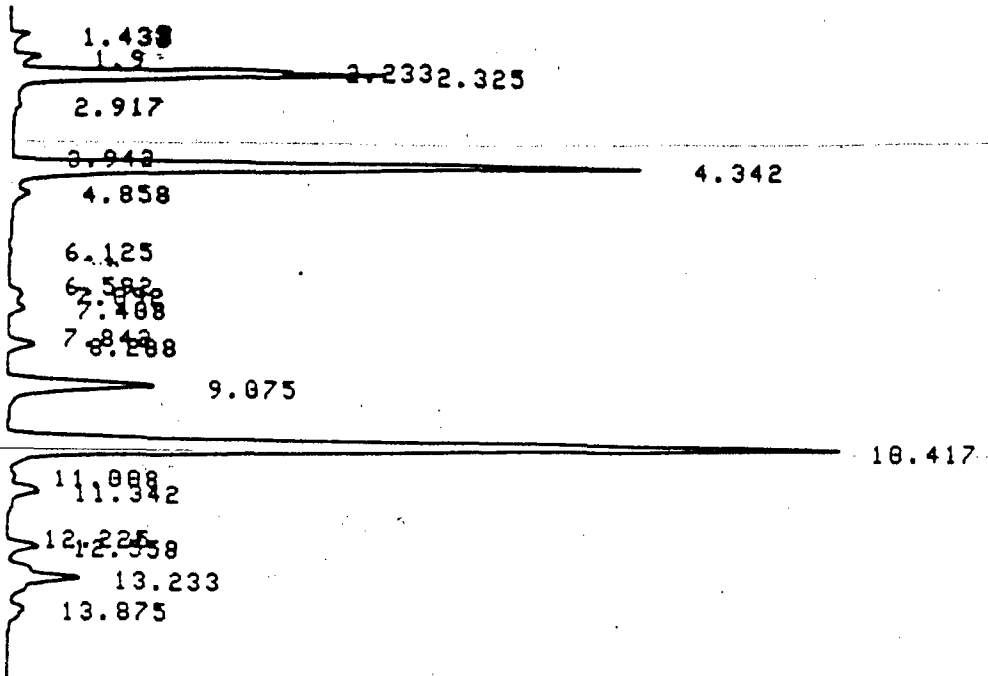
% SOLIDS: 1 %

ANALYSIS:

Water & Methanol	1.5%
Acetone	16%
M-E-K	24%
Lacquer Diluent	5%
MIBK	6%
Toluene	39%
Xylenes	6%
Others	2.5%
	<u>100%</u>

ANAL  
SPEED(8)=6  
ANAL 5

85/12/19 16:11:07



PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	2.233	41639	V		4.9381	ACETONE
2	2.325	86066	V		10.1985	ISOPROPYL ALCOHOL
3	4.342	228038			27.0004	METHYL ETHYL KETONE
4	9.075	64574			7.6457	METHYL ISOBUTYL KETONE
5	10.417	364216			43.1243	TOLUENE
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LACQUER THINNER COMPOSITION  
Safety-Kleen Corp.