



Department of Environmental Protection

SEP 25 1996

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jon Ercole, CHMM, Manager
Safety-Kleen Corporation
5610 Alpha Drive
Boynton Beach, FL 33426

RECEIVED
RCRA

Dear Mr. Ercole:

SEP 26 1996

Safety-Kleen Corporation
Second Notice of Deficiency
HO 50-287405
Palm Beach County - Hazardous Waste

Your application for a hazardous waste operation permit, received on April 8, 1996, along with the following informational submittals dated May 23, 1996, July 15, 1996, and July 26, 1996, has been reviewed and found to be incomplete. The required information to complete your application is itemized in the attached Notice of Deficiency (NOD).

When a permit application is incomplete, all processing of the application is suspended. You are advised to provide us with the requested additional information pursuant to Rule 62-730.220, Florida Administrative Code (FAC) and Chapter 403.0876, Florida Statutes (FS).

Please provide four (4) copies of your completed response to this office within thirty (30) days of receipt of this letter. If a complete response to each item is not received within the above time frame, the Department may begin formal proceedings to deny the permit, pursuant to Section 120, FS.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. If you have any questions regarding this letter, please contact me at (561)681-6674.

Sincerely,

John M. Jones, P.E.
Supervisor, Hazardous Waste Section

JJ/vp
Attachment

cc: FDEP/WPB Hazardous Waste Section Permit File
Doug Outlaw, FDEP/Tallahassee
Kent Williams, RCRA Permitting, USEPA/Atlanta

Second Notice of Deficiencies (NOD)
Safety-Kleen (Boynton Beach)
Part B Renewal Application received April 8, 1996
with subsequent submittals
Permit Number HO50-287405
EPA Identification Number FLD 984167791

1. General

Throughout the permit application, the notation "No changes subsequent to most recent approved modification to the permit" is used. Replace this language with the applicable date of the permit modification and **include as an attachment or addendum all the modifications referenced**. The modifications should be incorporated into the current permit application to make the resulting document a "stand-alone" permit renewal application.

This is a similar comment as the last NOD. The response provided by Safety-Kleen only included a list identifying the most recent modifications. The modifications must be compiled, the wording incorporated, and included in the permit application. In an attempt to assist Safety-Kleen with this effort, copies of the referenced permit modifications from Department files are being provided. The next submittal must not have any comments "No changes subsequent to most recent approved modification to the permit" but actually include all of the required information in the permit application to make it a "stand-alone" permit application. This comment must be addressed completely with the next submittal to maintain Department good will.

2. Description of Facility Operation - Attachment I.D.2

(a) **Please include descriptions of procedures**, including tanker cleaning prior to loading with fresh solvent, to ensure that the tanker truck delivering fresh solvent does not contain waste residues from previous transportation of spent solvent (including sludge or solids). A response was provided, but the procedure needs to be detailed in the permit application itself in this Section.

(b) Information regarding procedures to be used for the management of spent mercury-containing lamps and devices destined for recycling per Rule 62-737, F.A.C. should be included in the permit application.

(d) Page I.D.2-4. Describe procedures to ensure compatibility between waste streams to be mixed. The fact that Safety-Kleen acquires information from both the generator's (customer's) and Safety-Kleen's characterization of the material is good, but it is not complete and thorough. It is possible for contaminants to be present which may catalyze, oxidize, polymerize, etc. and for this reason it may prove useful to perform a bench compatibility test or similar test to determine that no potentially dangerous reactions occur, and include the procedure description in the permit application.

(g) Attachment I.D.3-1, footnote e. Describe the management of the used oil/ethylene glycol mixture. What are the exact names and addresses of the facilities that receive used oil from Safety-Kleen? Who accepts the ethylene glycol solution after separation, please provide names and addresses so verification of recycling can be made.

3. Closure Cost Estimate - II.A.2(a)

Please provide a revised Closure Cost Estimate. Enclosed are some forms which will aid in your submittal.

4. Preparedness and Prevention Procedures - Attachment II.A.4(d)

In your response Figure II.C.11-3 is referred to but cannot be located. Please provide this Figure.