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Department of Enviror. Intal Regulation

Routing and Transmittal Slip

To: (Name, Office, Location)

CAMILLE PLAUTZ

DER/TALLAHASSEE

HAZARDOUS WASTE REGULATION

Remarks:

SAFETY- KLEEN/ BOYLITOU RESPONSE TO REQUEST FOR APPITITIONAL TUFORMATION. THIS LOOKED TO BE ACCEPTABLE. THE BURA PERMITTING STAFF HAS DEAFTED MOD AND PASSED UP FOR STOUTURE.

From

KNOX MCKEE

Phone 50: 232-2656







DEC 2 2 1992

DEPT. OF ENVIRONMENTAL REG.
WEST PALM BEACH

December 21, 1992

Mr. J. Knox McKee, Jr.
Florida Department of
Environmental Regulation
Southeast District
1900 South Congress Avenue, Suite A
West Palm Beach, FL 33406

HAZARDOUS WASTE PERMITTING

RE: Response to Request for Additional Information Regarding Request for Modification of Hazardous Waste Operating Permit No. HO50-195905

Dear Mr. McKee:

Safety-Kleen Corp. (SK) acknowledges receipt on December 7, 1992 of your December 3, 1992 request for additional information. The letter concerns SK's request submitted October 26, 1992 for modification of Hazardous Waste Operating Permit No. HO50-195905. There were two items for which the agency requested additional information.

The first item was with regard to the tanker-truck-to-tanker-truck transfer operations. SK has no objections to the agency's request to perform these functions within areas where secondary containment is available. The appropriate portions of the text and figures have been revised to indicate that tanker-truck-to-tanker-truck transfers will occur within the truck unloading area on the north side of the building. This area is sloped to a sump which provides secondary containment.

The second item concerns controlling the mist generation from the wet dumpster/barrel washer. SK is still requesting that the mist generation needs to be controlled only by adjusting the flow rate. The washed drum must be situated on a drain shelf inside the barrel washer cover to contain any drippings. The lid cannot be closed when a drum is situated on this shelf. The cleaning process is continuous such that there is always a drum sitting on the drain shelf while at the same time, another drum is being washed. It is not physically possible to shut the lid when there is a drum sitting on the drain shelf.

I hope that these responses address the agency's concerns. If you have any questions, please contact me at (813) 682-8094.

Sincerely,

Victor L. San Agustin, P.E.

Regional Environmental Manager

Tampa Region

CHN/pjh

Enclosure(s)

c: C. Norton - ERM

ATTACHMENT II.A.1(c) TRAFFIC INFORMATION

The facility layout and traffic patterns are illustrated in Figure II.A.1(c).

The nonbuilding areas of the facility are paved with asphalt, concrete, or gravel as noted on the site plan (Figure II.A.1(c)-1). The stormwater retention area is vegetated with grass. The majority of the vehicular traffic (step side and one-ton box trucks) and loading/unloading operations occur at and near the return and fill area A and it is paved with asphalt and concrete (Figure II.A.1(c)-1). Approximately once per week a tractor trailer brings fresh drummed solvents and removes used drummed solvents for transfer to the recycle facility. This truck backs up to the eastern side of the concrete dock, located on the southern side of the facility in area B to load and unload drums. Area C will be used for the loading/unloading of transfer wastes and containerized permitted wastes from local area vans and trucks. Area E will be used for the truck-to-truck transfer of FRS wastes. Truck-to-truck transfer of spent ethylene glycol may occur in Area F. The transfer of wastes will occur only in areas with secondary containment.

Congress Avenue is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that daily travel the routes between the service center and its customers use the two-lane road within the industrial park. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area C approximately once per week. Traffic from this facility is not expected to have a major effect on local traffic conditions. Figure II.A.1(c)-2 presents anticipated 1987 average daily traffic counts for the entire region.

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DEC 2 2 1992

DEPT. OF ENVIRONMENTAL REG. WEST PALM BEACH



ATTACHMENT I.B.3 FACILITY LAYOUT AND PHOTOGRAPHS

The facility layout and traffic patterns are illustrated in Figures I.B.3-1 and I.B.3-2, respectively.

The nonbuilding areas of the facility are paved with asphalt or concrete as noted on the site plan (Figure I.B.3-1). The stormwater retention area and other minor areas are vegetated with grass. The majority of the vehicular traffic (step side and one-ton box trucks) and loading/unloading operations occur at and near the return and fill area A and it is paved with asphalt and concrete (Figure I.B.3-2). Approximately once per week a tractor trailer brings fresh drummed solvents and removes used drummed solvents for transfer to the recycle facility. This truck backs up to the eastern side of the concrete dock, located on the southern side of the facility in area B, to load and unload drums. Area C will be used for the loading/unloading of transfer wastes and containerized permitted wastes from local area vans and trucks. Truck-to-truck transfer of FRS wastes may occur on an asphalt area south or east of the warehouse (Area E). Truck-to-truck transfer of spent ethylene glycol may occur in Area F. The transfer of wastes will occur only in areas with secondary containment. Congress Avenue, which leads to Alpha Avenue, is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that daily travel the routes between the service center and its customers use the two-lane road within the industrial park. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area D approximately once per week. Traffic from this facility is not expected to have a major effect on local traffic conditions. Figure I.B.3-3 presents anticipated 1987 average daily traffic counts for the entire region.

Photographs which depict the hazardous waste management units, security features, and general layout of the facility are provided in this attachment. RECEIVED

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Florida Department of (BISOL) Environmental Regulation

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November 10, 1992

Sent Via Federal Express

Vivek Kamath, P.E. Hazardous Waste Management Florida Department of Environmental Regulation (1900 South Congress Avenue, Suite A West Palm Beach, Florida 33406

RE:

Hazardous Waste Transfer Facilities

Contingency / Emergency and Closure Plans

EPA ID Number FLD 984 171 694 and FLD 984 167 791

Dear Mr. Kamath:

Chapter 17-730 Florida Administrative Code (F.A.C.) contains the regulations governing the activities at hazardous waste transfer facilities in the state of Florida. Section 17-730.171 F.A.C. has recently been revised to require transfer facilities to submit a Contingency and Emergency Plan and Closure Plan to the Florida Department of Environmental Regulation (FDER).

Please find attached to this letter the required plans for the above referenced Safety-Kleen facility.

Should you have any questions please contact me at (813)-682-8094.

Sincerely,

Victor L. San Agustin, P.E.

Regional Environmental Manager

Tampa Region

cc: Satish Kastury, FDER

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Florida Department of Environmental Regulation

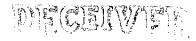
Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406

Lawton Chiles, Governor

Telephone: 407/433-2650 Fax: 407/433-2666 Carol M. Browner, Secretary

3 1992 DEC **CERTIFIED MAIL** RETURN RECEIPT REQUESTED

Mr. Victor L. San Agustin Regional Environmental Manager Safety-Kleen Corporation 129 South Kentucky Avenue, Suite 701 Lakeland, FL 33801



LIDUUS WASTE PERMITTING

RE: Request for modification of Hazardous Waste Operating Permit Ho 50-195905 (Submitted on October 26, 1992).

Dear Mr. San Agustin:

In order for the Department to process the above referenced request for modification, the following information is requested:

1. Safety-Kleen has requested that the permit include tanker truck to tanker truck transfer as an operating proceedure. Safety-Kleen has provided a description and maps showing the location where the transfer may occur. The Department suggests that any truck to truck transfer of hazardous wastes should be conducted where secondary containment has been designed for such operations. The areas with appropriate secondary containment are shown in Figure II.A.1(c)-1. Either of the areas labeled "A" or that area labeled "D" would provide the containment necessary to prevent an accidental release from escaping to soils surrounding the facility. The transfer areas (Area E and Area F) proposed in Attachment I.B.3 do not take advantage of the safety features inherent to the facility's design. An accidental release could flow off of the asphalt and on to surrounding soils or flow down into the storm drain (not shown in Figure II.A.1(c)-1). Please submit a management proceedure for truck to truck transfer which takes advantage of the containment systems designed and currently used at the facility for similar hazardous waste management activities.

2. The Department recognises Safety-Kleen's intent to use the facility's waste oil tank for

the storage of oily wastewater. Since no changes to the physical structure of the tank farm are

proposed the change is informational only. The Department appreciates the facility's diligence

in reporting the change.

3. Safety-Kleen reports that the drain line running from the sump in the truck loading area to

a valve to the retention pond area will be sealed. The Department is pleased by the facility's

initiative in seeking to identify and correcting a potential pathway for contamination.

4. The permit application indicates that the method used to control mist from the wet

dumpster/barrel washer is to close the lid. The facility has requested to change the method of

mist control to that of flow rate adjustment and has revised the 'text' to describe this proceedure.

More information is requested concerning this process change. In an effort to control mist,

splashing, and spilling it would seem prudent to employ both methods simultaneously. Given the

limited information provided in the modification request the Department suggests both closing

the lid of the dumpster/barrel washer and adjusting the flow rate.

5. Safety-kleen has updated the emergency contact list for the facility. The training portion

of the application has been updated. Both of these changes are considered to be informational

and again the Department appreciates the facility's prompt reporting of the modifications.

You are requested to submit a response to items #1 and #4, above. The response to these

items, with any necessary revisions to the permit modification, is requested within fifteen (15)

days of receipt of this letter. Please be aware that no decision on the modification of the permit

can be rendered until the requested informatiion is submitted and reviewed. Please call me, at

(407) 433-2650, if you have any questions.

Sincerely,

J. Knox McKee, Jr.

Supervisor, Hazardous Waste Section

cc: Satish Kastury, DER/Tallahassee

Alan Farmer, EPA/Atlanta

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Environmental Regulation

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Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 12, 1992

Mr. Victor L. San Agustin, P.E. Regional Environmental Manager Safety Kleen 129 South Kentucky Avenue, Suite 701 Lakeland, Florida 33801

Warning Notice 92-20

RE: Safety Kleen, All sites, Florida

Dear Mr. San Agustin:

I have received and reviewed your liability certificates of insurance. I request that you resubmit the certificates on state forms (enclosed).

Please resubmit these forms within fourteen days receipt of this letter. Failure to do so by this date may result in the initiation of formal administrative enforcement proceedings through the issuance of a Notice of Violation and the assessment of penalties. If the Department issues a Notice of Violation and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If you have questions concerning this matter, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

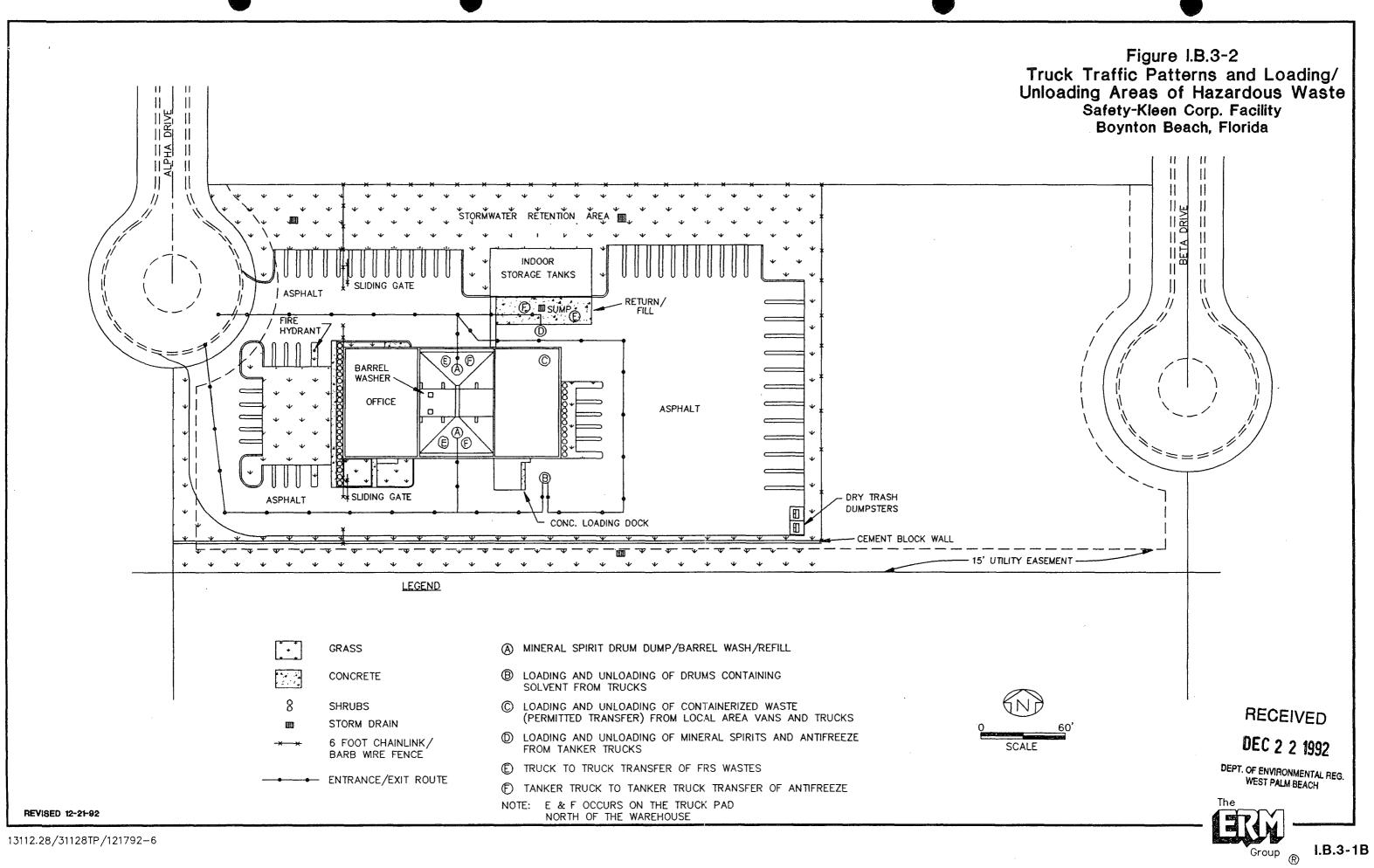
Environmental Specialist Hazardous Waste Regulation

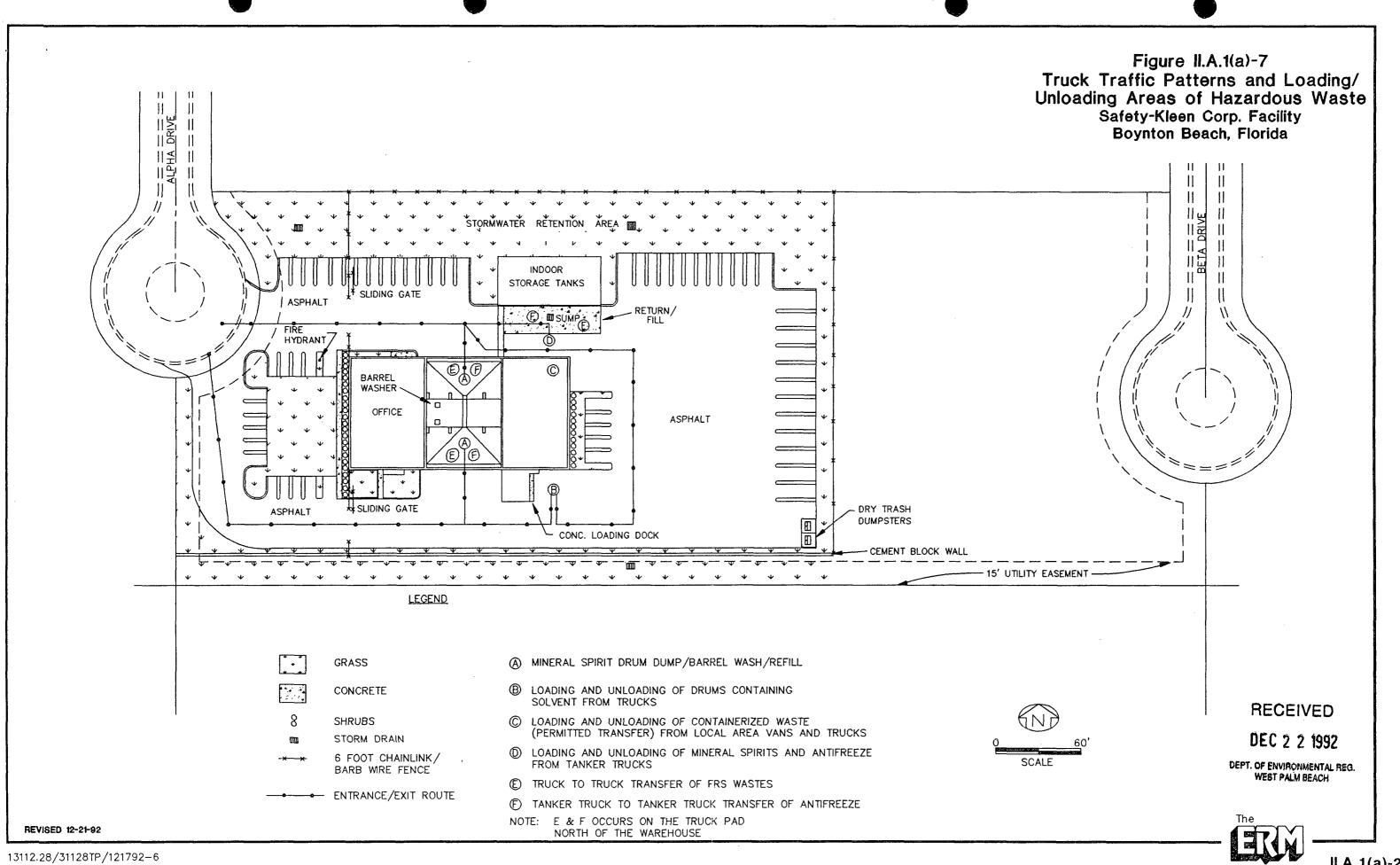
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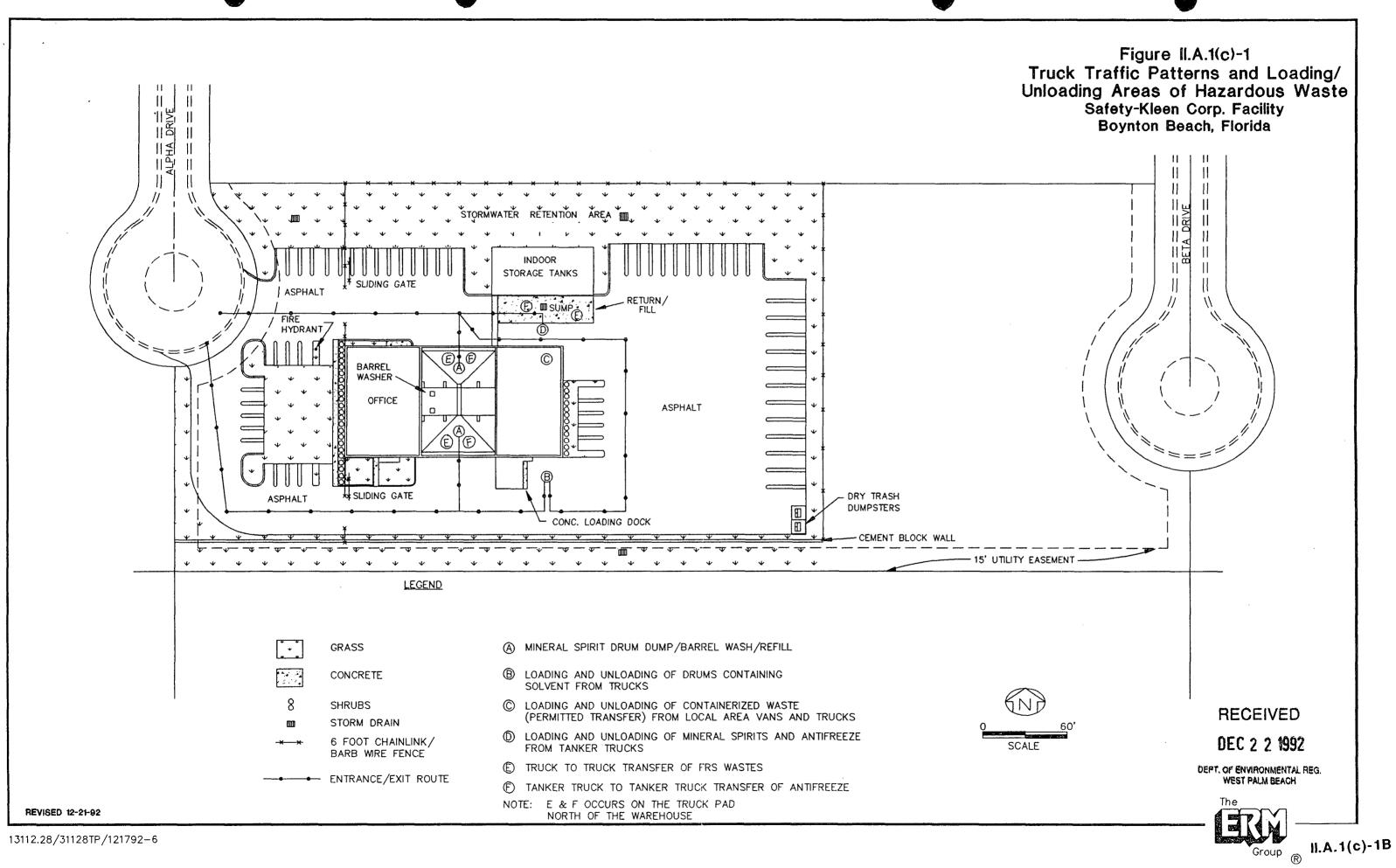
Enclosure

cc: Jeff Pallas, EPA, Atlanta
Gary Santti, DER, Tampa
Knox McGee, DER, West Palm Beach
Bob Snyder, DER, Orlando
Bill Kellenberger, DER, Pensacola
Doug Outlaw, DER, Tallahassee
Camille Plautz, DER, Tallahassee









ATTACHMENT II.A.1(c) TRAFFIC INFORMATION

The facility layout and traffic patterns are illustrated in Figure II.A.1(c).

The nonbuilding areas of the facility are paved with asphalt, concrete, or gravel as noted on the site plan (Figure II.A.1(c)-1). The stormwater retention area is vegetated with grass. The majority of the vehicular traffic (step side and one-ton box trucks) and loading/unloading operations occur at and near the return and fill area A and it is paved with asphalt and concrete (Figure II.A.1(c)-1). Approximately once per week a tractor trailer brings fresh drummed solvents and removes used drummed solvents for transfer to the recycle facility. This truck backs up to the eastern side of the concrete dock, located on the southern side of the facility in area B to load and unload drums. Area C will be used for the loading/unloading of transfer wastes and containerized permitted wastes from local area vans and trucks. Area E will be used for the truck-to-truck transfer of FRS wastes. Truck-to-truck transfer of spent ethylene glycol may occur in Area F. The transfer of wastes will occur only in areas with secondary containment.

Congress Avenue is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that daily travel the routes between the service center and its customers use the two-lane road within the industrial park. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area C approximately once per week. Traffic from this facility is not expected to have a major effect on local traffic conditions. Figure II.A.1(c)-2 presents anticipated 1987 average daily traffic counts for the entire region.

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DEPT. OF ENVIRONMENTAL REG. WEST PALM BEACH



ATTACHMENT I.B.3 FACILITY LAYOUT AND PHOTOGRAPHS

The facility layout and traffic patterns are illustrated in Figures I.B.3-1 and I.B.3-2, respectively.

The nonbuilding areas of the facility are paved with asphalt or concrete as noted on the site plan (Figure I.B.3-1). The stormwater retention area and other minor areas are vegetated with grass. The majority of the vehicular traffic (step side and one-ton box trucks) and loading/unloading operations occur at and near the return and fill area A and it is paved with asphalt and concrete (Figure I.B.3-2). Approximately once per week a tractor trailer brings fresh drummed solvents and removes used drummed solvents for transfer to the recycle facility. This truck backs up to the eastern side of the concrete dock, located on the southern side of the facility in area B, to load and unload drums. Area C will be used for the loading/unloading of transfer wastes and containerized permitted wastes from local area vans and trucks. Truck-to-truck transfer of FRS wastes may occur on an asphalt area south or east of the warehouse (Area E). Truck-to-truck transfer of spent ethylene glycol may occur in Area F. The transfer of wastes will occur only in areas with secondary containment. Congress Avenue, which leads to Alpha Avenue, is the major access road to the facility. The access road is designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The vans that daily travel the routes between the service center and its customers use the two-lane road within the industrial park. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area D approximately once per week. Traffic from this facility is not expected to have a major effect on local traffic conditions. Figure I.B.3-3 presents anticipated 1987 average daily traffic counts for the entire region.

Photographs which depict the hazardous waste management units, security features, and general layout of the facility are provided in this attachment.



