

Revised material to replace pages in the permit
renewal application. (SUPP FILE)

RCRA Permitting Routing Slip

Facility Name: Safety-Kleen, Boynton

PATS No.: H050-195905 287405

| <u>TO</u> | <u>NAME</u> | <u>INITIALS</u> | <u>DATE</u> |
|-----------|-------------------|-----------------|----------------|
| _____ | KASTURY, Satish | _____ | _____ |
| _____ | Ashwood, Janet | _____ | _____ |
| _____ | Outley, Debra | _____ | _____ |
| _____ | RUSSELL, Merlin | _____ | _____ |
| _____ | Bland, Susan | _____ | _____ |
| _____ | Graves, Shelton | _____ | _____ |
| _____ | James, David | _____ | _____ |
| _____ | Kaharoeddin, Ami | _____ | _____ |
| _____ | Liu, Xinlan | _____ | _____ |
| _____ | Madrid, Nicanor | _____ | _____ |
| _____ | Papp-Wells, Joyce | _____ | _____ |
| _____ | Smith, Cindy | _____ | _____ |
| _____ | Stein, Camille | _____ | _____ |
| _____ | OUTLAW, Doug | <u>DOU</u> | <u>5/17/96</u> |
| _____ | Budeir, Maher | _____ | _____ |
| _____ | Griffin, John | _____ | _____ |
| _____ | Pierson, Dennis | _____ | _____ |
| _____ | Ryan, Aine | _____ | _____ |
| _____ | Singh, Harbhajan | _____ | _____ |
| _____ | KOTHUR, Bheem | <u>BK</u> | <u>8/20/96</u> |
| _____ | Owutaka, Alex | _____ | _____ |
| _____ | Prusty, Rabin | _____ | _____ |
| _____ | OTHER | _____ | _____ |

REQUIRED ACTION & COMMENTS:

PROJECT MANAGER: Kothur
LOGGED IN: [Signature]



RECEIVED
RCRA

AUG 6 1996

5401 W. Kennedy Blvd., Suite 400
Tampa, Florida 33609
813 / 289-5218
FAX: 813 / 289-6950

May 23, 1996

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MAY 24 1996

DEPT OF ENV PROTECTION
WEST PALM BEACH

Florida Department of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33401

Attention: Mr. John M. Jones, P.E.

Subject: RCRA Part B Permit Renewal Application
Safety-Kleen Corp.
Boynton Beach, Florida
FLD 984167791

Dear Mr. Jones:

Enclosed please find four copies of the revised material which is to replace existing pages in the permit renewal document which has been submitted to you. These may be replaced on a page-for-page basis (i.e. substitute the new I.D.3-1A(1) for the old I.D.3-1A(1)). The only "additional" pages are II.A.5-10 and the Material Safety Data Sheets for the aqueous solvents. The MSDSs will be placed in Appendix A of II.A.4(b) of the current permit.

If you have any questions regarding the material, or the placement of the pages, please do not hesitate to call us at (813) 289-5218. Thank you for your assistance in this matter.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

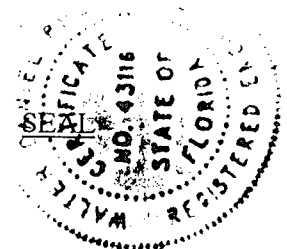
A handwritten signature in dark ink, appearing to read "W.D. Phelps", written over a horizontal line.

W.D. Phelps, P.E.
Project Manager

WDP/kla

Enclosures

A handwritten signature in dark ink, appearing to read "Kim Alderman", written over a horizontal line.
Kim Alderman, E.I.
Staff Engineer



**SAFETY-KLEEN CORPORATION
BOYNTON BEACH, FLORIDA SERVICE CENTER
RCRA PART B PERMIT RENEWAL APPLICATION**

RECEIVED

MAY 24 1996

DEPT OF ENV PROTECTION
WEST PALM BEACH

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| Division | Section | Content |
|----------|---------|---------|
|----------|---------|---------|

II. Application for Renewal of Hazardous Waste Facility Permit - Part II (Cont'd)

- C. **Part II, Section C - Tanks:** (pages 1-12 inclusive of FDEP permit review checklist modified to incorporate responses to Part II, Section C.)

Revised Part II, Section C Attachments - Revision #9

| <u>Attachment #</u> | <u>Title</u> | <u>Pages</u> |
|---------------------|-------------------------------|-------------------------------|
| II.C.2 | Tank System Specifications | II.C.2-1 to II.C.2-4 |
| II.C.9 | Controls and Spill Prevention | II.C.9-1 to II.C.9-3 |
| II.C.11 | Tank System Inspections | II.C.11-1 to II.C.11-2 |
| II.C.12(a) | Tank System Closure Plan | II.C.12(a)-1 to II.C.12(a)-10 |

- D-O. **Part II Sections D through O:** page 1 of 1 of FDEP permit review checklist modified to incorporate responses to Part II, Section D through Section O.

- P. **Part II, Section P - Information Regarding Potential Releases from Solid Waste Management Units:** (page 1 of 1 of FDEP permit review checklist modified to incorporate responses to Part II, Section P.) and FDEP Part II application form 62-730.900(2)(c), pages 44, 45, and 46.

III. Certifications: FDEP form 62-730(2)(d), pages 1-4 inclusive

- A. Operator certification, page 1 of 4
- B. Facility and Landowner certifications, page 2 of 4
- C. Professional Engineer certification, page 3 of 4
- D. Professional Geologist certification, page 4 of 4

**ATTACHMENT I.D.3-1
SAFETY-KLEEN CORP. FACILITY
BOYNTON BEACH, FLORIDA**

| Waste Type | Process Code(s) | Estimated Annual Amounts (Tons) | Waste Codes |
|--|--------------------------------------|---------------------------------|---|
| Spent Parts Washer Solvent ^a | S01 ^b S02 ^c | 993 | D001 and D-Codes Listed in Note Below |
| Dumpster Sediment | S01 ^b | Included Above | D001 and D-Codes Listed in Note Below |
| Tank Bottoms | S01 ^b | Included Above | D001 and D-Codes Listed in Note Below |
| Spent Ethylene Glycol | S01 ^e | 5,000 | D-Codes Listed in Note Below |
| Spent Immersion Cleaner (Old Formula) | S01 ^d | 31 | F002, F004, and D-Codes Listed in Note Below |
| Spent Immersion Cleaner (New Formula) | S01 ^b | Included Above | D-Codes Listed in Note Below |
| Dry Cleaning Waste (Perchloroethylene) | S01 ^b | 350 | F002 and D-Codes Listed in Note Below |
| Dry Cleaning Waste (Non-perchloroethylene) | S01 ^d | Included Above | D001 or F002 and D-Codes Listed in Note Below |
| Paint Waste | S01 ^b | 50 | D001, F003, F005 and D-Codes Listed in Note Below |
| Fluid Recovery Service (FRS) Waste | S01 ^d | 250 | D001, D002, and D-Codes, F-Codes, K-Codes, U-Codes Listed in Note Below |

NOTE: D-Codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F-Codes: F001, F002, F003, F004, F005, F006, F019, F024, F039

K-Codes: K006, K016, K019, K022, K029, K030, K031, K048, K049, K050, K051, K052, K085, K086, K095, K096, K009, K010, K011, K013, K014, K015, K002, K003, K004, K005

U-Codes: U001, U002, U003, U009, U031, U037, U043, U044, U051, U052, U055, U056, U057, U068, U069, U070, U071, U072, U075, U077, U078, U079, U080, U083, U084, U107, U108, U110, U112, U113, U117, U118, U121, U125, U140, U154, U159, U161, U162, U165, U169, U171, U188, U191, U196, U210, U211, U213, U220, U226, U227, U228, U239, U359

^a Spent parts washer is transported from the customer to the Service Center as a hazardous waste unless a generator's hazardous waste determination indicates that it is non-hazardous. Once it reaches the Service Center, it may be bulked with hazardous parts washer of a similar nature and managed as a hazardous waste.

The parts washer solvents are transported in covered containers between the service center and customers. Upon returning to the service center, the used parts washer solvents are transferred from the containers into a wet dumpster (solvent return receptacle) in which coarse solids in the parts washer solvents are retained. Used parts washer solvents from the wet dumpster flows into a 15,000-gallon aboveground tank for storage. Used parts washer solvent is picked up periodically by a bulk tank truck from the recycle facility which at the same time delivers a load of clean parts washer solvent. The sludge in the wet dumpster is periodically cleaned out, containerized, and temporarily stored in the container storage area for later shipment to the recycle facility for reclamation.

Text edited to update permit on generic types of parts washer solvents provided.

The immersion cleaner remains in a covered container at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers or while in storage at the service center. Immersion cleaner #699 is managed as a transfer waste. Dry cleaning wastes are picked up at commercial dry cleaning establishments in containers and are stored temporarily at the service center. The containers are picked up periodically for recycling at the recycle facility. Nonperchloroethylene dry cleaning wastes are managed as a transfer waste.

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers.

Reference to Immersion Cleaner #609 removed.

The antifreeze waste is approximately one-third water and two-thirds antifreeze (ethylene glycol) and contaminants. The waste is collected in 150-gallon carboys at the customer's facility. The spent ethylene glycol is managed in containers at the customer's facility. Non-hazardous spent ethylene glycol is managed in a combined,

MATERIAL SAFETY DATA SHEET

MSDS NUMBER: MSDS-957L

ISSUE DATE: 12/01/95

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1. PRODUCT IDENTIFICATION

Product Name

AquaWorks™ Cleaning Solution

Emergency Phone:

1-609-683-5900 (U.S.A.)

Medical Emergency Phone:

1-800-228-5635

Ext. 007 (U.S.A.)

2. COMPOSITION/INFORMATION ON INGREDIENTS

- Not hazardous under the OSHA Hazard Communication Standard 29 CFR 1910.1200.
- Contains no components that are reported to be carcinogenic by any reference source including IARC, OSHA, NTP and EPA.

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Hazy, whitish-gray liquid.
Slight/mild odor.
Not a primary skin irritant.
May cause mild eye irritation.
Not a fire hazard.
No other significant health or environmental effects known or anticipated.

HMIS Rating

| | |
|------------|---|
| Health | 0 |
| Fire | 0 |
| Reactivity | 0 |

Potential Health Effects

EYE: May be mildly irritating to eyes.

SKIN CONTACT: May cause slight irritation from continually repeated, prolonged, or occluded contact.

INGESTION: Considered non-toxic. Swallowing a small amount (< 1 ounce) is not likely to have an adverse effect. Ingestion of a large quantity (more than an ounce) may cause abdominal discomfort and may irritate the alimentary mucosa.

INHALATION: Considered non-toxic. Prolonged inhaling of mist may aggravate pre-existing upper respiratory disorders and cause irritation to the nose, throat and lungs.

SUBCHRONIC EFFECTS/CARCINOGENICITY: None known. The ingredients in this product are not listed as carcinogens or potential carcinogens by NTP Annual Report, IARC Group I or II, OSHA 29 CFR 1910 Subpart Z, and ACGIH Appendix A.



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4. FIRST AID MEASURES

SKIN: Remove contaminated clothing. Wash exposed areas with soap and water.

EYES: Immediately flush eyes with clean, flowing water, low pressure and luke warm if possible, occasionally lifting upper and lower eyelids. Make sure contact lenses are removed. Seek medical attention if irritation develops.

INHALATION: Move from area of exposure. Treat symptomatically. Seek medical attention if irritation develops or if person has difficulty breathing.

INGESTION: If large amounts are ingested, do not induce vomiting. If person is conscious, give two glasses of water to drink. Do not attempt to give anything orally to an unconscious person. Seek medical attention.

NOTE TO PHYSICIAN: Ingestion of large amounts may cause systemic alkalosis. Treatment based on judgement of physician in response to reactions of patient.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES

FLAMMABLE LIMITS

FLASHPOINT: Not Applicable

LFL: Not Applicable

METHOD USED: Not Applicable

UFL: Not Applicable

EXTINGUISHING MEDIA: Use extinguishing media for surrounding fire.

FIRE-FIGHTING INSTRUCTIONS: Carbon dioxide may be generated by thermal decomposition or exposure to acids. Thermal decomposition may also yield carbon monoxide and oxides of sulfur and nitrogen. Wear a self-contained breathing apparatus (SCBA) and full protective equipment.

UNUSUAL FIRE AND EXPLOSION HAZARDS: None known.

6. ACCIDENTAL RELEASE MEASURES

Will create slippery conditions if spilled. Close off area to traffic. Exercise proper cautions during clean-up. Large spills should be contained. Absorb using clay or commercial absorbent and dispose of in suitable waste containers as regulations permit (See Section 12). Flush residues to sewer or waste water system. Prevent eye and skin contact by wearing appropriate protective equipment (See Section 8). Be sure cleaned area is dry or slip-free before reopening to traffic.

7. HANDLING AND STORAGE

Store in original containers away from incompatible materials (acids). Keep containers tightly closed. Prevent skin and eye contact during handling by wearing appropriate protective equipment (See Section 8).

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8. EXPOSURE CONTROLS/PERSONAL PROTECTION

RESPIRATORY PROTECTION: None required under normal use conditions. If mists are generated, wear a NIOSH approved respirator.

PROTECTIVE GLOVES: It is good personal and industrial hygiene to prevent skin contact with the solution. Impermeable gloves are recommended to prevent skin contact during use or for cleaning up spills.

EYE PROTECTION: Chemical splash goggles are recommended when handling or working with solution, or for cleaning up spills.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: As part of normal personal hygiene, wear an impermeable apron where splashing of solution cannot be avoided.

VENTILATION: No special requirements unless mists are generated, then use local exhaust ventilation.

PROTECTIVE WORK/HYGIENIC PRACTICES: No special requirements with respect to chemical exposure other than those noted above. Specific requirements with respect to equipment and specific applications are the responsibility of the user.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Hazy whitish-gray liquid

ODOR: Slight/mild

PHYSICAL STATE: Liquid

pH AS IS: 10.8

VAPOR PRESSURE: N/A

BOILING POINT: 100-110°C

FREEZING POINT: -10°C - 0°C

SOLUBILITY IN WATER: Complete

SPECIFIC GRAVITY (Water = 1): Approximately 1.0 @ 25°C

APPARENT DENSITY: 8.4 lbs/gal @ 25°C

SURFACE TENSION: 35 dynes

VISCOSITY: < 100 cp

% VOLATILE: Approximately 98% as water

VOLATILE ORGANIC COMPOUNDS: None with vp ≥ 0.1 mm Hg.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable.

CONDITIONS TO AVOID: Acids

INCOMPATIBILITY WITH OTHER MATERIALS: Reacts with acids to release carbon dioxide.

HAZARDOUS DECOMPOSITION PRODUCTS: May produce carbon monoxide, carbon dioxide, and fumes of SO_x and NO_x.

HAZARDOUS POLYMERIZATION: Will not occur.



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11. TOXICOLOGICAL INFORMATION

EYE EFFECTS: No specific data available. Tests on concentrated versions of similar formulations indicate that mild to moderate irritation is possible with those concentrates. These effects are minimized and reversible with immediate treatment with no corneal involvement or visual impairment expected. The 10% bath solution can be expected to have a minimal to mild effect if not treated.

SKIN EFFECTS: No specific data available. Not a primary skin irritant based on testing of a concentrated version of a similar formulation. Bath solution may be irritating to humans under conditions of repeated or prolonged contact. Any irritant effect would be expected to be minimal and fully reversible.

ACUTE ORAL EFFECTS: No specific data available. Concentrated versions of similar formulations have been shown to be non-toxic with an $LD_{50} > 5000$ mg/kg.

INHALATION EFFECTS: No data available. May cause irritation to upper respiratory tract if inhaled as a mist. Irritation would be expected to be transient with no permanent damage.

12. DISPOSAL CONSIDERATIONS

Dispose of spilled or waste product and other large amounts in accordance with all local, state and federal environmental regulations. State and local regulations may differ from Federal. Be sure to consult with appropriate agencies for specific rules.

13. TRANSPORTATION INFORMATION

D.O.T. SHIPPING NAME: Not regulated

TECHNICAL SHIPPING NAME: Aqueous Cleaning-Solution

D.O.T. HAZARD CLASS: None

U.N./N.A. NUMBER: None

HAZARDOUS SUBSTANCE/RQ: None

D.O.T. LABEL: None

D.O.T. PLACARD: None

14. REGULATORY INFORMATION

OSHA

This product has been assessed as nonhazardous under the criteria of the OSHA Hazard Communication Standard (29 CFR 1910.1200).

TSCA

The ingredients in this product are reported in the U.S. EPA TSCA Inventory.

15. MSDS REVISION SUMMARY

SUPERSEDES DATE: NEW

This Product Safety Data Sheet is offered solely for your information, consideration and investigation. Church & Dwight Co., Inc. provides no warranties, either express or implied, and assumes no responsibility for the accuracy or completeness of data contained herein. Church & Dwight Co., Inc. urges persons receiving this information to make their own determination as to the information suitability for their particular application.

ABC

MAY 17 1996



Material Safety Data Sheet

SAFETY-KLEEN AQUEOUS CLEANER

Part Number: 6300

MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

MAY 17 1996

SECTION 1 – PRODUCT AND PREPARATION INFORMATION

PRODUCT INFORMATION

IDENTITY (TRADE NAME): SAFETY-KLEEN AQUEOUS CLEANER

SYNONYMS: Not available.

SK PART NUMBER: 6300

FAMILY/CHEMICAL NAME: Not available.

PRODUCT USE: Cleaning and degreasing metal parts.
If this product is used in combination with other chemicals, refer to the Material Safety Data Sheets for those chemicals.

24-HOUR EMERGENCY TELEPHONE MEDICAL:

TRANSPORTATION:

These numbers are for emergency use only. If you desire non-emergency information about this product, please call a telephone number listed below.

1-800-752-7869 (USA)

1-708-888-4660 (USA)

1-312-942-5969 (CANADA)

1-613-996-6666 (CANADA)

MANUFACTURER/SUPPLIER: Safety-Kleen Corp. - 1000 North Randall Road - Elgin, IL, 60123-7857 USA
Telephone number: 1-800-669-5740
Safety-Kleen Canada Inc. - 300 Woolwich Street South - Breslau, ON, Canada N0B 1M0
Telephone number: 1-800-265-2792

PREPARATION INFORMATION

MSDS FORM NO.: 82470

REVISION DATE: October 12, 1994

ORIGINAL ISSUE DATE: March 23, 1992

SUPERSEDES: August 18, 1993

PREPARED BY: Product MSDS Coordinator

APPROVED BY: MSDS Task Force

TELEPHONE NUMBER: For Product Technical Information Call 1-312-694-2700 (USA); 1-519-648-2291 (Canada)

SECTION 2 – HAZARDOUS COMPONENTS

| NAME | SYNONYM | CAS NO. | WT% | OSHA PEL | | ACGIH TLV | | OTHER DATA | |
|---|----------------------------------|------------|-----|----------|-------|-----------|-------|-----------------|-----------------|
| | | | | TWA | STEL | TWA | STEL | LD ^a | LC ^b |
| Alcohols, C12-14-secondary, ethoxylated | Alkyloxy polyethylene oxyethanol | 84133-50-6 | 2 | N.Av. | N.Av. | N.Av. | N.Av. | N.Av. | N.Av. |

N.Av. = Not Available

^aOral-Rat LD50^bInhalation LC

SECTION 3 – EMERGENCY AND FIRST AID PROCEDURES

EYES: For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. Material misting is unlikely. However, if irritation or redness from exposure to mist develops, move victim away from exposure into fresh air. Consult physician if irritation or pain persists.

SAFETY-KLEEN AQUEOUS CLEANER

MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

SKIN: Remove contaminated clothing and shoes. Wash skin twice with soap and water. Consult physician if irritation or pain persists.

INHALATION:
(Breathing) Inhalation of material is unlikely. Nevertheless, if inhalation occurs, remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if breathing has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.

INGESTION:
(Swallowing) Seek immediate medical attention. Drink two glasses of water. Do NOT induce vomiting. If spontaneous vomiting occurs, keep head below hips to avoid aspiration (breathing) into the lungs.

SPECIAL NOTE TO PHYSICIAN: No specific antidote available. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Call emergency telephone number (see Section 1) for additional information.

SECTION 4 -- HEALTH HAZARD DATA AND TOXICOLOGICAL PROPERTIES

PRIMARY ROUTES OF EXPOSURE: Eye and skin contact; inhalation, ingestion.

EXPOSURE LIMITS: See Section 2.

SIGNS AND SYMPTOMS OF EXPOSURE

ACUTE: *Eyes:* Contact with liquid may cause stinging, tearing, itching, swelling, or redness, with possible injury.

Skin: Contact with liquid may cause irritation. No significant skin absorption hazard.

Inhalation (Breathing): Inhalation of material is unlikely. Nevertheless, inhalation of misted material may irritate the respiratory tract.

Ingestion (Swallowing): Harmful if swallowed. May cause mouth and throat irritation, nausea, abdominal discomfort, diarrhea, vomiting, and central nervous system depression. Breathing into the lungs during ingestion or vomiting may cause lung injury and possibly death.

CHRONIC: Prolonged or repeated eye contact may cause conjunctivitis. Prolonged or repeated skin contact may cause drying, cracking, or dermatitis.

MEDICAL CONDITIONS

AGGRAVATED BY EXPOSURE: Individuals with pre-existing skin disorders may have increased susceptibility to the effects of exposure.

CARCINOGENICITY: Not applicable.

Also see Section 9.

OTHER POTENTIAL HEALTH HAZARDS:

The following information is required by Canadian WHMIS regulations. Irritancy is covered in Signs and Symptoms of Exposure in Section 4. There is no known human sensitization, toxicologically synergistic product, reproductive toxicity, mutagenicity, or teratogenicity associated with this product as a whole.

SECTION 5 -- FIRE AND EXPLOSION HAZARD DATA

EMERGENCY RESPONSE GUIDE NUMBERS:

31

Reference DOT Emergency Response Guidebook

49

Reference Dangerous Goods Initial Emergency Response Guide

FIRE AND EXPLOSION HAZARDS:

This is an aqueous solution and is not expected to sustain combustion. Not sensitive to mechanical impact or static discharge.

FIRE FIGHTING PROCEDURES:

Not applicable. (Combustion is not expected.)

SAFETY-KLEEN AQUEOUS CLEANER
MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

EXTINGUISHING MEDIA: Water, alcohol-resistant foam. (Combustion is not expected.)

CONDITIONS OF FLAMMABILITY: Not applicable. (Combustion is not expected.)

FLASH POINT: Not applicable. (Combustion is not expected.)

AUTOIGNITION TEMPERATURE: Not applicable. (Combustion is not expected.)

FLAMMABLE LIMITS IN AIR: **LOWER:** Not applicable. (Combustion is not expected.)
UPPER: Not applicable. (Combustion is not expected.)

HAZARDOUS COMBUSTION PRODUCTS: Although combustion is not expected, if burning occurs, toxic compounds may be produced.

SECTION 6 -- REACTIVITY DATA

STABILITY: Stable under normal temperatures and pressures, and not reactive with water.

INCOMPATIBILITY (MATERIALS AND CONDITIONS TO AVOID): None known under normal temperatures and pressures.

HAZARDOUS POLYMERIZATION: Not known to occur under normal temperatures and pressures.

HAZARDOUS DECOMPOSITION PRODUCTS: None under normal temperatures and pressures.

SECTION 7 -- PREVENTIVE MEASURES

PRECAUTIONS FOR SAFE USE AND HANDLING

HANDLING

PRECAUTIONS: Minimize contact with eyes, skin, clothing, or shoes. Avoid breathing mist.

**PERSONAL
HYGIENE:**

Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco products. Clean contaminated clothing, shoes, and protective equipment before reuse. Discard contaminated clothing, shoes, or protective equipment if they cannot be thoroughly cleaned.

**SHIPPING AND
STORING
PRECAUTIONS:**

Keep container tightly closed when not in use and during transport. Empty product containers may contain product residue.

**SPILL
PROCEDURES:**

Stop leak if you can do it without risk. Wear protective equipment specified in Section 7, **CONTROL MEASURES**. Contain away from surface waters and sewers. If possible, sorb with compatible sorbent material and shovel into closable container for proper disposal. See *DOT Emergency Response Guidebook* guide number 31 or *Dangerous Goods Initial Emergency Response Guide* guide number 49 for more information.

**WASTE DISPOSAL
METHODS:**

Dispose in accordance with federal, state, provincial, and local regulations. Contact Safety-Kleen regarding recycling or proper disposal.

CONTROL MEASURES

**EYE
PROTECTION:**

Where there is likelihood of eye contact, wear chemical goggles; use of contact lenses is not recommended.

**PROTECTIVE
GLOVES:**

Use PVC or equivalent gloves to prevent contact with skin; use of natural rubber or equivalent gloves is not recommended.

SAFETY-KLEEN AQUEOUS CLEANER

MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

| | |
|------------------------------------|---|
| RESPIRATORY PROTECTION: | None required with normal use. However, if required, the selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134 or in Canada with CSA Standard Z94.4-M1982. |
| ENGINEERING CONTROLS: | No specific controls are needed. |
| OTHER PROTECTIVE EQUIPMENT: | Where spills and splashes are likely, wear appropriate protective clothing. Clean water should be available in work areas for flushing the eyes and skin. |

SECTION 8 -- PHYSICAL DATA

| | |
|---|---|
| PHYSICAL STATE, APPEARANCE AND ODOR: | Liquid, clear, colorless or blue, odorless. |
| ODOR THRESHOLD: | Not applicable. |
| SPECIFIC GRAVITY: | 1 (water = 1) (approximately) |
| DENSITY: | 8.33 lb/US gal (1000 g/l) (approximately) |
| VAPOR DENSITY: | 0.6 (air = 1) (approximately) |
| VAPOR PRESSURE: | 17.5 mm Hg at 68°F (20°C) (approximately) |
| BOILING POINT: | 212°F (100°C) (approximately) |
| FREEZING POINT: | 32°F (0°C) (approximately) |
| pH: | greater than 7 (approximately) |
| VOLATILE ORGANIC COMPOUNDS: (PHOTOCHEMICALLY REACTIVE AS PER 40 CFR PART 51.100 (S)) | 3 WT%; 0.2 lb/US gal; 30 g/l (approximately) |
| EVAPORATION RATE: | less than 1 (butyl acetate = 1) (approximately) |
| SOLUBILITY IN WATER: | Complete. |
| COEFFICIENT OF WATER/OIL DISTRIBUTION: | greater than 1 |
| MOLECULAR WEIGHT: | Not available. |

SECTION 9 -- OTHER REGULATORY INFORMATION

TRANSPORTATION INFORMATION

| | |
|----------------------------------|---|
| DOT PROPER SHIPPING NAME: | Not regulated. |
| DOT CLASS: | Not regulated. |
| DOT ID NUMBER: | Not regulated. |
| TDG CLASSIFICATION: | Not regulated. |
| SARA TITLE III: | Components listed in Section 2 are not subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. |

SAFETY-KLEEN AQUEOUS CLEANER

MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

Product poses the following health hazard as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986:

Immediate (Acute) Health Hazard

WHMIS CLASSIFICATION:

Not regulated.

TSCA:

All the components of this product are listed on, or are exempted from the requirement to be listed on, the TSCA Inventory.

CALIFORNIA:

This product is not for sale or use in the State of California.

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet apply to the material as supplied to the user.

**ATTACHMENT II.A.5
WASTE ANALYSIS REPORT**

In accordance with U.S. EPA Hazardous Waste Regulations, five types of hazardous waste have been identified at the service center:

1. The used Parts Cleaner 105 returned from customers in separate containers transferred and stored in the aboveground tank awaiting shipment to the recycle facility is considered to be an Ignitable Waste (D001). Other used aqueous solvents and other used petroleum-based solvents are non-ignitable. The used parts washer solvent may be considered characteristic waste by toxicity characteristic leaching procedure (TCLP) (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). Spent parts washer solvent from customers' parts washers is accumulated in a 15,000 gallon aboveground storage tank via the return and fill station. Containers of solvent are poured into a drum washer at the return and fill station, which in turn empties into the tank.

Parts washer solvents, dumpster mud, and tank bottom sludge accumulated in the solvent return receptacles (wet dumpsters) and in the sludge tank, are considered to be an Ignitable Waste (D001) a characteristic waste by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). Other parts washer solid debris, such as metal parts and filters, are considered a characteristic waste only by TCLP.

D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

5. Due to the great variability in the composition of FRS wastes, their application or use, and the source industry, Safety-Kleen characterizes each stream from each generator separately. FRS waste received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. These wastes, except characteristic waste oil, are shipped in containers and are stored on pallets. The FRS wastes are handled as transfer wastes only. It is anticipated that 39,000 gallons of spent parts washer solvents, 158,000 gallons of spent halogenated solvents and 60,000 gallons of spent lacquer thinners will be shipped from the service center to a reclaimer on an annual basis.

6. The aqueous parts washer solvent is primarily an aqueous solution with a small amount of organic additives (alcohols). The spent aqueous parts washer solvent is transported from the customers in containers. Spent aqueous parts washer solvent from customers' parts washers may be accumulated in a 15,000 gallon aboveground storage tank via the return and fill station. Containers of solvent are poured into a drum washer at the return and fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by toxicity characteristic leaching procedure (TCLP) (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029,

D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

7. The Aqueous Brake Cleaner (ABC) is primarily an aqueous solution with approximately 10% nonorganic additives and detergents. The spent Aqueous Brake Cleaner (ABC) is transported from the customers in containers. Spent aqueous parts washer solvent from customers' parts washers may be accumulated in a 15,000 gallon aboveground storage tank via the return and fill station. Containers of solvent are poured into a drum washer at the return and fill station, which in turn empties into the tank. The used aqueous parts washer solvent may be considered characteristic waste by toxicity characteristic leaching procedure (TCLP) (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043).

A typical composition and chemical physical analysis for waste streams listed above are shown in the attached chemical analyses reports, based on existing data on these wastes generated from similar processes within Safety-Kleen's current and/or potential customers.

USED PARTS WASHER SOLVENT

The clean parts washer solvents are labeled under trade names. Chemically, the solvent primarily consists of petroleum hydrocarbon fraction with boiling points between 310°F and 400°F. Flash points of the petroleum based parts washer solvents range from 105°F (ignitable) to 212°F. Impurities, such as light aromatic hydrocarbons (LAHC) and chlorinated hydrocarbons, usually constitute less than one percent of the total volume.

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The used petroleum-based parts washer solvent consists primarily of parts washer solvent, plus water, solid, oil, and grease picked up in the various degreasing operations. In most instances, no water is associated with the used solvent; however, at times, the water content may range from one percent to as much as 50 percent. The oily bottoms may range from 2 percent to 10 percent, by volume, in the used solvent. The used parts washer premium solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11. Hazardous characteristics of the used parts washer solvents can vary and are primarily associated with constituents introduced by the customers' processes. Chemically, the composition of the solvent fraction in the used parts washer solvent is essentially the same as the clean solvent, as shown in analyses.

USED PARTS WASHER SOLVENT BOTTOM SLUDGE

This is material settled from used parts washer solvent in the aboveground tanks. It contains basically soils, oil and grease, and some water picked up in the degreasing operations, together with a small amount of parts washer solvent. Analyses have shown that the sludge is an ignitable waste and might also be considered toxic using TCLP standards. The sludge is removed from the aboveground tank periodically and shipped to a Safety-Kleen facility for reclamation.

USED PARTS WASHER SOLVENT DUMPSTER MUD

This waste material is accumulated in the wet dumpsters when emptying the used parts washer solvents from the containers into the aboveground storage tanks. Filters from parts washers utilizing Premium solvent may also be added. The nature of this waste is similar to the used parts washer solvent bottom sludge, except with some small metal parts and less parts washer solvent. It is regarded as an ignitable waste and often is also considered a characteristic waste using TCLP standards.

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The sludge in the dumpsters is cleaned out frequently. The waste is containerized, stored as a permitted waste, and shipped to Safety-Kleen's recycle facility for recycling.

Text edited to removed outdated business statistics not related to environmental compliance.

USED IMMERSION CLEANER

An "Immersion Cleaner and Carburetor and Cold Parts Cleaner #699" is also being leased. It is a heavy aromatic naphtha, N-methyl-2-pyrrolidone dipropylene glycol methyl ether, monoethanolamine and oleic acid, and contains a maximum of one percent total chlorinated solvents.

Reference to Immersion Cleaner #609 removed.

The used immersion cleaner is basically unchanged from its clean state, except oil, grease, and other solids may be picked up during the various degreasing operations. The spent solvent is non-flammable. It is regarded as toxic because of the presence of various contaminants. Less than five gallons of waste is returned in each container.

DRY CLEANING WASTES

Solvent used in dry cleaning of clothing is commonly tetrachloroethylene (or perchloroethylene), mineral spirits, or trichlorotrifluoroethane. Hence, waste generated from dry cleaning operations contains various concentrations of the solvent. Basically, wastes generated by dry cleaning facilities are in the following forms.

1. Cartridge Filter: In addition to the construction materials consisting of steel, paper, clay, and carbon, the used cartridge retains solvent, oil and grease, and undissolved

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elements such as lint and soil. Solvent retained in the filter cartridge generally amounts to less than 50 percent of the total cartridge weight.

2. **Muck:** At some dry cleaning facilities, a mixture of powdered materials is used as the filter medium for the dry cleaning solvent, in lieu of the cartridge filter. This filter medium normally consists of diatomaceous earth and carbon. In addition to lint, soil, oil, and grease retained by the medium, between 40 and 50 percent by weight of the "muck" is absorbed solvent.
3. **Still Residue:** After filtration, the dry cleaning solvent is distilled by the dry cleaning machine to remove the dissolved materials from the used solvent. The dissolved materials (still residues) are in liquid form and consist of primarily detergent, oil and grease, vinyl acetate (a sizing compound), and 20 to 30 percent of solvent. This facility will ship about 80,000 gallons of dry cleaner wastes for reclamation annually. *Text edited to remove reference to the discontinued practice of managing bulk perchloroethylene and to remove references to outdated business statistics not related to environmental compliance.*

FRS WASTES

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. These products may or may not have been originally obtained from Safety-Kleen by the industrial customer. These wastes are handled as transfer wastes at the Service Center. Examples of the types of wastes that may be received from FRS customers include:

1. Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, and naphtha, etc.

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2. Lubricating, hydraulic oils, synthetic oils, and machine oils.
3. Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, freon, and trichloroethane.
4. Photographic and x-ray related wastes.
5. Paint and lacquer thinners and paint wastes.
6. Other hazardous and non-hazardous halogenated and non-halogenated wastes.

Text edited to remove reference to discontinued services.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program.

Certain other wastes that result from the use of organic solvents are also managed through the service centers. These include the solids and sludges that settle out of the used solvent during handling and processing. Lint, paper, oils, greases, carbons, and metals are examples of materials which may settle or separate out of used solvent. In addition to the listed waste codes, these wastes may also exhibit a characteristic under the toxicity characteristic leaching procedure.

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Certain solvents are not economically recoverable in their prime form. These are typically solvents of low intrinsic value (e.g., methanol), those where the user's specification are unattainable or where the mixture cannot be efficiently separated because of the formation of azeotropes, overlapping or close boiling ranges. However, when properly blended and processed, these solvents can be a beneficial source of energy. The Safety-Kleen recycle centers are equipped to process non-recoverable solvent mixtures with still bottoms from recovery of their solvent to produce valuable solvent based fuels.

Text edited to delete references to the Recycle Center which are not related to the operation of this service center.

ANTIFREEZE COLLECTION SERVICE

The spent antifreeze (ethylene glycol) is collected from automobile service stations. Nonhazardous ethylene glycol is commingled with used oil in a tanker truck, and hazardous ethylene glycol is segregated. It should be noted that the vast majority of the antifreeze sample analyses indicated this waste is not hazardous. However, due to the low concentrations at which contaminants render a waste hazardous under TCLP, the container storage area for spent antifreeze has been permitted to hold hazardous antifreeze.

PAINT WASTE COLLECTION

The paint wastes are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The contents of the containers are verified by the sales representative when he services the customer and, comparable to the handling of immersion cleaner, the containers are not reopened until they reach the recycle center.

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Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints. Both are characteristic wastes by TCLP (D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043). The waste is collected in containers at the customer's place of business and the containers are then palletized and stored in a designated storage area. It is anticipated that this facility will ship 14,300 gallons of paint waste to a reclaimer annually.

If the laboratory confirms that the waste contains hazardous waste constituents which the Safety-Kleen facility is not permitted to accept, the generator will be responsible for securing an alternate means of disposal.

Text edited to clarify the Safety-Kleen Boynton Beach facility will not accept wastes for which it is not permitted to manage.

Waste Specific Criteria

The following is a description of the specific acceptance criteria for each waste stream.

Spent Parts Washer Solvent

The acceptance criteria for determining by visual inspection whether spent parts washer solvent has been contaminated are volume and color, the most significant of which is volume. Safety-Kleen places clean parts washer solvent in 5-, 16-, and 30-gallon containers with the customer which, if no additional material has been added to the container, should not hold more than the 5, 10, and 19 gallons of waste, respectively, at the time of waste pick-up since those volumes are equal to the respective product amounts in the containers. If the volume of waste in a given container exceeds the specified level, the Safety-Kleen service representative will sample the waste for laboratory testing as described above, or will reject the waste.

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent has a tint ~~or is clear~~. The ~~aqueous~~ parts cleaner is colorless. As the solvent is used, it ~~changes~~ color. The specific color to which the solvent ~~changes~~ is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops ~~changes to~~ brown or black, while solvent used by silk screeners will ~~change to~~ the color of the inks (red, blue, pink, green, etc.). If the spent solvent color does not appear to be consistent with the type of equipment being cleaned, the service representative will sample the waste for possible contamination as described above, or will reject the waste.

Text edited to update permit on current parts washer systems provided.

ATTACHMENT II.B.3
WASTE MANAGEMENT

PROCEDURE FOR MANAGING WASTE TYPES

The used solvents are compatible with each other and with other materials to be handled at this facility, with respect to reactivity, and therefore do not require special segregation procedures. All materials are managed in accordance with the local fire protection code and fire department requirements. Overpack containers are used for the management of containers whose integrity has been compromised.

Text edited to delete references to business practices not relevant to environmental compliance.

The immersion cleaner is always contained in partially filled, covered containers before, during, and after its use. Until received at the recycle facility, the immersion cleaner is never transferred to another container. The containers containing the used immersion cleaner are returned to the facility and stored in the designated container storage areas before shipment to the recycle center.

Reference to Immersion Cleaner #609 removed.

The dry cleaning wastes are contained in containers. All containers are Department of Transportation (DOT)-approved. These containers are managed similarly to the used immersion cleaner containers and contents within the containers are not removed or processed at the facility. Nonperchloroethylene dry cleaning wastes are managed as transfer wastes.

The parts washer solvents are collected in containers. These containers are then emptied into the dumpsters in the return/fill shelter.

Paint wastes consist of various lacquer thinners and paints. The waste is collected in containers at the customer's place of business and the containers are stored in the container storage area of the warehouse.

FRS wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F- waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility as transfer wastes under the FRS program.

The containers are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT shipping container specifications.

Text edited to remove references to outdated or irrelevant material from permit.

Tables II.B.3-1 through II.B.3-7 are to be deleted from permit.

Wastes are stored primarily in polyethylene and steel containers. Since none of the waste handled by Safety-Kleen reacts with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

POTENTIAL FIRE SOURCES

The following is a list of fire prevention and minimization measures:

1. All wastes and products are kept away from ignition sources--Personnel must confine smoking and open flames to designated areas. The parts washer solvent handling area and the aboveground storage tanks are separate from the

Text edited to delete reference to irrelevant material. Table II.B.4-1 is to be deleted from permit.

Fluid Recovery Service (FRS) wastes received at the facility are classified as characteristic wastes (D-waste codes), non-specific source wastes (F-waste codes), listed wastes from specific sources (K-wastes), commercial chemical products, manufacturing intermediates or off-specification chemical commercial products (U-waste codes). Most of the time, a waste stream will be some combination of specific components, and be categorized as a D- or F-waste. Table II.A.5-1 provides a list of the EPA waste codes managed at the facility under the FRS program. The FRS wastes will be managed as transfer wastes. The manifests will not be terminated at the service center. The management of FRS wastes as transfer wastes includes the provision to conduct truck-to-truck transfer of the FRS wastes. Truck-to-truck transfers are accomplished within two hours. An area for the temporary storage of the FRS wastes will be delineated by a chain and/or stantions. The FRS wastes will be clearly indicated as being transfer wastes.

Wastes are stored ~~primarily~~ in polyethylene and steel containers. Since none of the wastes handled by Safety-Kleen react with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste containers are never opened at the branch, and none of the wastes are incompatible.

Containers will be double-stacked. The containers will be arranged so that a two-foot aisle space exists between all rows of pallets such that all containers can be readily visible for inspection and handling. Since all materials handled by Safety-Kleen are compatible with one another, no specific areas have been designated for specific wastes. Wastes will be grouped by type and are distinguishable by the color of the container; however, since the actual volume present of any product at a given time varies greatly, it is not practical to assign specific locations to given wastes.

ATTACHMENT II.C.2

TANK SYSTEM SPECIFICATIONS

The facility includes five aboveground steel tanks (Figure II.C.2-1). Used containerized parts washer solvent returned from customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The other four tanks consist of one 15,000-gallon fresh parts washer solvent product tank (parts cleaner 105 or premium solvent), one 20,000-gallon nonhazardous oily water tank, one 20,000-gallon product tank, and one 5,000-gallon product tank. These four tanks are not considered Resource Conservation and Recovery Act (RCRA) tanks.

MATERIAL COMPATIBILITY

Parts washer solvent is compatible with the mild steel tank structure; in fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation and the addition of aqueous parts washer solvent. The parts washer solvent has a specific gravity less than water and the water will accumulate in the bottom of the tank. The mild steel material used in construction of the tank is compatible with the parts washer solvent mixture.

TANK DESIGN AND OPERATION PROCEDURES

Spent parts washer solvents from parts washers is accumulated in the 15,000-gallon aboveground storage tank by transfer through the return and fill station. Containers are poured into the dumpsters (barrel washers) in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment.

The barrel washers are located within the parts washer solvent return and fill shelters. The drawings (Figures II.C.2-2(a) through II.C.2-2(j)) provide detail information on the barrel washers.

Used solvent is returned from customers via containers and poured into the barrel washers. The container is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the container to remove solids inside the container. The machine is turned off and the container is removed. The procedure takes several seconds per unit. The container is then refilled using a pump and nozzle (Figure II.C.2-3) similar to a gasoline pump.

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used parts washer solvent storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge drum for recycle. Each barrel washer is equipped with one drain pan. One satellite accumulation container (approximately five gallons) is connected to each drain pan. These containers collect any spillage which falls into the drain pans. These containers are periodically emptied into the barrel washers in order to add the waste parts washer solvent to the bulk waste parts washer solvent tank.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by reducing the flow rate of the spray nozzles. Collected spent antifreeze is transferred from a tanker truck into the bulk tank.

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are

shown in Figures II.C.2-4(a) and II.C.2-4(b). All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high-level alarms. The design and installation of the tank alarm system is shown in Figures II.C.2-5(a) through II.C.2-5(d). The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer). All tanks were new and unused when installed.

Attachment II.C.1 provides an independent assessment of the tank system. The parts washer solvent assessment by Wishmeier & Associates includes a detailed description of the tank system components and operation. The assessment of the ethylene glycol tank was prepared by TERA, Inc. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used parts washer solvent tank may be operated at a maximum volume of 14,250 gallons (95 percent).

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Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

"No smoking" signs are posted on the entrance to the tank farm and return/fill station.

ATTACHMENT II.C.9 CONTROLS AND SPILL PREVENTION

The tank system is designed to minimize the potential for spills and to control any spills which may occur. The tank area prevention and control system includes proper tanks, and containment walls and trenches. The return/fill shelter consists of dumpsters (barrel washers) located inside a containment area.

The prevention and control system minimizes the opportunity for an uncontrolled release of material to the environment.

DESCRIPTION OF FACILITY

The facility utilizes five aboveground steel tanks. Used parts washer solvent housed in containers returned by the customers are transferred via the wet dumpster into a 15,000-gallon tank, awaiting bulk shipment to the recycle center. The other four tanks consist of one 15,000-gallon parts washer solvent product tank, one 20,000-gallon nonhazardous oily water tank, one 20,000-gallon product tank and one 5,000-gallon product tank. These four tanks are not considered Resource Conservation and Recovery Act (RCRA) tanks.

MATERIAL COMPATIBILITY

Parts washer solvent is compatible with the mild steel tank structure. In fact, petroleum products are often used as a light hydrocarbon coating to prevent rusting of metal parts. As with all petroleum storage vessels, water will accumulate over time due to condensation and the addition of aqueous parts washer solvent. The parts washer solvent has a specific gravity less than water and the water will accumulate in the bottom of the tank. There is the potential for corrosion of the tank at the parts washer solvents/water interface.

Spent parts washer solvent from parts washers is accumulated in a 15,000-gallon aboveground storage tank via the return and fill station. Used solvent is returned from customers via containers and poured into the barrel washers. The container is then placed on roller brushes contained within the barrel washer. As the machine is turned on, the container rotates on the brush and the outside of the container is cleaned. There is also a nozzle that sprays a stream of solvent into the bottom of the container to clean the inside of the container. The machine is turned off and the container is removed. The procedure takes several seconds per container.

The used solvent goes to a sump in the bottom of the barrel washer and is automatically pumped to the used parts washer solvent storage tank. There is a basket in the sump that collects sludge. Approximately twice a day, this basket is removed and sludge is removed and placed into a sludge container for recycle.

The barrel washer is a totally enclosed unit. A small amount of mist is generated while operating the unit. This is controlled by reducing the flow rate. The spent antifreeze is transferred from a tanker truck into the bulk tank or another tanker truck.

TANKS

The tanks are designed and constructed to be compatible with the materials stored in them. Typical construction and installation standards for the aboveground tanks are discussed in Attachment II.C.2. All tanks are vented in accordance with National Fire Protection Association (NFPA) standards, and the tanks are equipped with high level-alarms. The tank seams are lapped with full fillet welds. The weld is done with an E70 electrode and can withstand a 4-psi air pressure test (which is performed by the manufacturer).

Attachment II.C.1 provides an independent assessment of the tank systems. This assessment includes a detailed description of the tank systems' components and operation. The following is a concise description of the main features of the tank system.

All tanks are aboveground, underlain by a 71' x 32'4" x 6" concrete slab, surrounded by a 36" concrete dike and are in an enclosed building. Therefore, no surface run-on or precipitation would be in contact with the wastes stored in the tank farm and no run-off collection and management system is deemed necessary. Gauges are used to measure liquid levels in tanks and float switch-activated automatic high level alarms (which consist of a strobe light and siren) will signal the tank's being 95 percent full. This alarm allows an operator more than two minutes to stop operations and avoid overfilling the tank. In addition, the gauges of the tank must be read before filling and before and during the filling of a tanker truck (the available volume of which must be noted prior to emptying the tank) to prevent overfilling of the truck. A suction pump equipped with the tanker truck is used to withdraw used parts washer solvent from the tank. No other equipment or standby equipment is used in the operation of the aboveground tanks. The secondary containment under the tanks and return/fill station must be cleaned within 24 hours of a spill. The used parts washer solvent tank may be operated at a maximum volume of 14,250 gallons (95 percent). The spent antifreeze tank may be operated at a maximum volume of 19,000 gallons (95 percent).

Material which collects in the tank dike and return/fill station can be removed using a "wet/dry" vacuum, sorbents, or mop.

No smoking signs are posted on the entrance to the tank farm and return/fill station.

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APR 16 1996

DEPT OF ENV. PROTECTION
WEST PALM BEACH

EMERGENCY PHONE NUMBERS

Emergency Coordinators:

| | | | |
|----------|---------------------|------------|--------------------|
| Primary: | Tim Sholl | Alternate: | Peter Cordero |
| | 9001 SW 49 St. | | 2951 SW 135th Ave. |
| | Cooper City, FL | | Miami, FL |
| | 33328 | | 33175 |
| | H. 305-680-3622 | | H. 305-824-1509 |
| | O. 305-884-0123 | | O. 305-884-0123 |
| | Beeper 305-650-5584 | | B. 305-650-5578 |

Emergency Notification Phone Numbers:

Safety-Kleen 24 hour EHS 800-468-1760

National Response Center: 800-424-8802

FDEP SE District, 400 N. Congress Ave. West Palm Beach, FL 33401
407-681-6600 (M-F) Except Holidays. All other times call DEM

Florida Department of Emergency Management (DEM) 904-488-1320

Dade County Environmental Resources Management (DERM) Mr. Mike
Graham 305-375-3376

Emergency Teams to be Notified

Metro Dade Fire Department
8175 NW 12th Street
Miami, FL 33126
305-470-1760 or 911

O.H. Materials Company
P.O.Box 551
Findlay, OH 45839
800-537-9540
Primary Clean-up Contractor

Medley Police Department
7331 NW 74th Street
Medley, FL 33166
305-887-9541 or 911

Ryckmans Emergency Action Team
Consulting Team (REACT)
1733 S. Vanderventer
St. Louis, MO 63146
800-325-1398
Secondary Clean-up Contractor

AMI-Palmetto General Hospital
2001 West 68th Street
Hialeah, FL 33016
305-823-5000



Department of Environmental Protection

Lawton Chiles

Governor
AUG - 1 1996

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

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Coral Wang
Envirosafe Recycling, Inc.
1937 Sans Souci Blvd.
North Miami, FL 33181

DEP File No. WT13-273212
Dade County
Permit File

Dear Ms. Wang:

Enclosed is Permit Number WT13-273212 to construct and operate a Waste Tire Processing Facility.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions, please contact Mr. Joseph Lurix of this office, telephone number (516) 681-6669.

Executed in West Palm Beach, Florida on this 15th day of August, 1996.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Vivek Kamath

Vivek Kamath, P.E.
Waste Programs Administrator
Southeast District

CERTIFICATE OF SERVICE

This is to certify that this **NOTICE OF PERMIT** and all copies were mailed before the close of business on AUG - 1 1996 to the listed persons.

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to \$120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Andrell Mayie
Clerk

AUG - 1 1996
Date

Copies furnished to:

Jeff Braswell, OGC/TLH
Steven E. Black, P.E.
Edwin J. Spahn, P.E.
Frances Keith, SW/TLH
Paul Lasa, MDCDERM
Lee Casey, MDCDSWM



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

AUG - 1 1996

PERMITTEE:

Ms. Coral Wang
Envirosafe Recycling, Inc.
1937 Sans Souci Blvd.
North Miami, Florida 33181

I.D. NUMBER: 5013P07440
PERMIT/CERTIFICATION NUMBER: WT13-273212
DATE OF ISSUE: AUG - 1 1996
EXPIRATION DATE: AUG - 1 2001
COUNTY: Dade
LATITUDE/LONGITUDE: 25°53'10"/80°10'12"
SECTION/TOWNSHIP/RANGE: 29/52/42
PROJECT: Envirosafe Recycling, Inc.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-701 and 62-711, Florida Administrative Code. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

TO CONSTRUCT/OPERATE: A Waste Tire Processing Facility utilizing shredders, grinders, magnetic metal separators, crumb rubber/fiber separation, bagging and packaging of recovered recycled materials for the production of crumb rubber, steel and fiber products.

IN ACCORDANCE WITH: An application for permit to construct and operate a Waste Tire Processing Facility dated May 22, 1995 and additional information submitted on October 5, 1995, January 16, 1996, May 7, 1996, June 7, 1996 and June 19, 1996, with a Notice of Application published on July 27, 1995.

LOCATED AT: 12050 Northeast 14th Avenue, North Miami, Dade County, Florida.

SUBJECT TO: General Conditions 1-15 (attached as pages 2 and 3) and Specific Conditions 1-12 (attached as pages 4 through 5).

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

GENERAL CONDITIONS Cont'd:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following monitoring and record keeping requirements:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
 - b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - analytical techniques or methods used; and
 - results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Unless otherwise approved by the Department, the permittee shall operate the waste tire processing facility in accordance with all the applicable sections of Chapters 62-711, 62-701 and 62-4, F.A.C.
2. The permittee shall maintain compliance in accordance with Section 62-711.510(2) and Section 62-711.630, F.A.C. The permittee shall maintain the Solid Waste Management Facility Irrevocable Standby Letter of Credit No. M513185, dated June 19, 1996, by the Barnett Bank of South Florida, N.A., in the amount moneys adequate to cover the closure cost estimate dated May 7, 1996 for \$9,000.00. The permittee shall provide closing cost estimates for the quantity of waste tires on their site or the quantity of waste tires that they are permitted to have on their site, whichever is greater. The cost estimate shall be the amount that would be expended to remove, process, and dispose of waste tires on the site and to close the site. The costs shall be based on a third party, who is not a subsidiary or parent company, performing the work, reported on a per unit basis. Quantity estimates shall be certified by a Professional Engineer. The closing cost estimate shall be re-estimated at least annually and submitted to the Department at least 60 days prior to the anniversary date of the instrument. All original submittals in response to this specific condition shall be submitted to:

Department of Environmental Protection
Waste Tire Financial Coordinator
Solid Waste Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400;

and a copy to:

Department of Environmental Protection
Southeast District Office
Solid Waste Section
P.O. Box 15425
West Palm Beach, FL 33416

3. All waste tires and processed tires shall be stored in accordance with the waste tire site requirements in Rule 62-711.510, F.A.C., and storage requirement in Rule 62-711.540, F.A.C.
4. The maximum amount of whole waste tires that shall be stored on site at any time is 5,000 whole tires (50 tons). The total amount of waste tires that shall be stored onsite is 70 tons (50 tons of whole waste tires and 20 tons of processed waste tires), in accordance with the June 5, 1996 submittal prepared by Mr. Edwin J. Spahn, P.E., Fire Protection Engineer of Spahn Engineering Services, Fire Protection Engineering. The maximum daily throughput of the equipment proposed in the application for this facility shall be 2,500 Passenger Tire Equivalents (PTE) per day, 720,000 PTE per year. The average daily throughput is projected to be 2,500 PTE per day and 720,000 PTE per year. The permittee shall not accept any waste tires for processing at this facility if the permittee has reached the permitted storage limit for any category of waste tires, or if the number of waste tires on the site exceeds the quantity estimate in the closing cost estimate.
5. Processed tires stored for recycling or disposal shall meet the minimum size requirements specified in Rule 62-711.400(3)(b), F.A.C. At least 75 percent of the whole tires, used tires, and processed tires that are delivered to or are contained on the site of the waste tire processing facility at the beginning of each calendar year shall be processed and removed for disposal or recycling from the facility during the year, or disposed at an off-site permitted solid waste management facility. Processed tires stored for recycling or disposal shall meet the minimum size requirements specified in Rule 62-711.400(3)(b), F.A.C., unless a demonstration is made as part of a permit application or modification that storage of a larger size will not adversely affect the environment or the public health or welfare, and that storage of a larger size is necessary for purposes of recycling or transportation.
6. The permittee shall comply with Sections 62-711.530(4) and (5), F.A.C., inclusive. The permittee shall submit a quarterly report to the District Office that summarizes all of the information collected under Section 62-711.530(4), F.A.C., no later than the 20th day of the month following the close of each calendar quarter. The reports shall be submitted to the Department on DEP Form 62-711.900(4), attached as Exhibit A.
7. The permittee shall apply for a renewal of this permit at least sixty (60) days prior to the expiration date.

SPECIFIC CONDITIONS Cont'd:

8. In the event of damage or failure of any of the site facilities/equipment, the permittee shall immediately notify the Department, explaining such occurrences and remedial measures to be taken and time needed for repairs. A detailed written notification shall be submitted within one week to the Department following the occurrence.
9. In the event of closure of this facility, the permittee shall be responsible for the removal of all processed and unprocessed tires to a facility approved by the Department for disposal or processing. Failure to properly remove all tire material and close the site may result in forfeiture of the financial mechanism to the Department.
10. The permittee shall maintain this facility in compliance with the fire safety survey prepared by Edwin J. Spahn, P.E. dated June 5, 1996.
11. The permittee shall build this facility in accordance with the Site Plan prepared by Mr. Steven E. Black, P.E. of ATEC Associates, Inc., dated April 25, 1995.
12. Within thirty (30) days of construction completion or prior to commencement of operation, the permittee shall complete and submit a certification of construction completion on DEP Form 62-701.900(2) (attached as Exhibit B) for this facility. This certification shall be signed and sealed by the engineer of record or other professional engineer registered in the State of Florida. Upon submittal of this certification, the permittee shall contact the Department to arrange for an inspection with the engineer and the on-site facility operator.

Issued this 1st day of August, 1996

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Vivek Kamath

Vivek Kamath, P.E.
Waste Programs Administrator
Southeast District

VK/jl



Department of Environmental Protection

Lawton Chiles

Governor
AUG - 1 1996

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

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Coral Wang
Envirosafe Recycling, Inc.
1937 Sans Souci Blvd.
North Miami, FL 33181

DEP File No. WT13-273212
Dade County
Permit File

Dear Ms. Wang:

Enclosed is Permit Number WT13-273212 to construct and operate a Waste Tire Processing Facility.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

If you have any questions, please contact Mr. Joseph Lurix of this office, telephone number (516) 681-6669.

Executed in West Palm Beach, Florida on this 1st day of August, 1996.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Vivek Kamath

Vivek Kamath, P.E.
Waste Programs Administrator
Southeast District

CERTIFICATE OF SERVICE

This is to certify that this **NOTICE OF PERMIT** and all copies were mailed before the close of business on AUG - 1 1996 to the listed persons.

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Andrell Marie
Clerk

AUG - 1 1996
Date

Copies furnished to:

Jeff Braswell, OGC/TLH
Steven E. Black, P.E.
Edwin J. Spahn, P.E.
Frances Keith, SW/TLH
Paul Lasa, MDCDERM
Lee Casey, MDCDSWM



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

AUG - 1 1996

PERMITTEE:

Ms. Coral Wang
Envirosafe Recycling, Inc.
1937 Sans Souci Blvd.
North Miami, Florida 33181

I.D. NUMBER: 5013P07440
PERMIT/CERTIFICATION NUMBER: WT13-273212
DATE OF ISSUE: AUG - 1 1996
EXPIRATION DATE: AUG - 1 2001
COUNTY: Dade
LATITUDE/LONGITUDE: 25°53'10"/80°10'12"
SECTION/TOWNSHIP/RANGE: 29/52/42
PROJECT: Envirosafe Recycling, Inc.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-701 and 62-711, Florida Administrative Code. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

TO CONSTRUCT/OPERATE: A Waste Tire Processing Facility utilizing shredders, grinders, magnetic metal separators, crumb rubber/fiber separation, bagging and packaging of recovered recycled materials for the production of crumb rubber, steel and fiber products.

IN ACCORDANCE WITH: An application for permit to construct and operate a Waste Tire Processing Facility dated May 22, 1995 and additional information submitted on October 5, 1995, January 16, 1996, May 7, 1996, June 7, 1996 and June 19, 1996, with a Notice of Application published on July 27, 1995.

LOCATED AT: 12050 Northeast 14th Avenue, North Miami, Dade County, Florida.

SUBJECT TO: General Conditions 1-15 (attached as pages 2 and 3) and Specific Conditions 1-12 (attached as pages 4 through 5).

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

SPECIFIC CONDITIONS:

1. Unless otherwise approved by the Department, the permittee shall operate the waste tire processing facility in accordance with all the applicable sections of Chapters 62-711, 62-701 and 62-4, F.A.C.
2. The permittee shall maintain compliance in accordance with Section 62-711.510(2) and Section 62-711.630, F.A.C. The permittee shall maintain the Solid Waste Management Facility Irrevocable Standby Letter of Credit No. M513185, dated June 19, 1996, by the Barnett Bank of South Florida, N.A., in the amount moneys adequate to cover the closure cost estimate dated May 7, 1996 for \$9,000.00. The permittee shall provide closing cost estimates for the quantity of waste tires on their site or the quantity of waste tires that they are permitted to have on their site, whichever is greater. The cost estimate shall be the amount that would be expended to remove, process, and dispose of waste tires on the site and to close the site. The costs shall be based on a third party, who is not a subsidiary or parent company, performing the work, reported on a per unit basis. Quantity estimates shall be certified by a Professional Engineer. The closing cost estimate shall be **re-estimated** at least **annually** and submitted to the Department at least **60 days prior to the anniversary date of the instrument**. All original submittals in response to this specific condition shall be submitted to:

Department of Environmental Protection
Waste Tire Financial Coordinator
Solid Waste Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400;

and a copy to:

Department of Environmental Protection
Southeast District Office
Solid Waste Section
P.O. Box 15425
West Palm Beach, FL 33416

3. All waste tires and processed tires shall be stored in accordance with the waste tire site requirements in Rule 62-711.510, F.A.C., and storage requirement in Rule 62-711.540, F.A.C.
4. The maximum amount of whole waste tires that shall be stored on site at any time is 5,000 whole tires (50 tons). The total amount of waste tires that shall be stored onsite is 70 tons (50 tons of whole waste tires and 20 tons of processed waste tires), in accordance with the June 5, 1996 submittal prepared by Mr. Edwin J. Spahn, P.E., Fire Protection Engineer of Spahn Engineering Services, Fire Protection Engineering. The maximum daily throughput of the equipment proposed in the application for this facility shall be 2,500 Passenger Tire Equivalents (PTE) per day, 720,000 PTE per year. The average daily throughput is projected to be 2,500 PTE per day and 720,000 PTE per year. The permittee shall not accept any waste tires for processing at this facility if the permittee has reached the permitted storage limit for any category of waste tires, or if the number of waste tires on the site exceeds the quantity estimate in the closing cost estimate.
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6. The permittee shall comply with Sections 62-711.530(4) and (5), F.A.C., inclusive. The permittee shall submit a quarterly report to the District Office that summarizes all of the information collected under Section 62-711.530(4), F.A.C., no later than the 20th day of the month following the close of each calendar quarter. The reports shall be submitted to the Department on DEP Form 62-711.900(4), attached as Exhibit A.
7. The permittee shall apply for a renewal of this permit at least sixty (60) days prior to the expiration date.

SPECIFIC CONDITIONS Cont'd:

8. In the event of damage or failure of any of the site facilities/equipment, the permittee shall immediately notify the Department, explaining such occurrences and remedial measures to be taken and time needed for repairs. A detailed written notification shall be submitted within one week to the Department following the occurrence.
9. In the event of closure of this facility, the permittee shall be responsible for the removal of all processed and unprocessed tires to a facility approved by the Department for disposal or processing. Failure to properly remove all tire material and close the site may result in forfeiture of the financial mechanism to the Department.
10. The permittee shall maintain this facility in compliance with the fire safety survey prepared by Edwin J. Spahn, P.E. dated June 5, 1996.
11. The permittee shall build this facility in accordance with the Site Plan prepared by Mr. Steven E. Black, P.E. of ATEC Associates, Inc., dated April 25, 1995.
12. Within thirty (30) days of construction completion or prior to commencement of operation, the permittee shall complete and submit a certification of construction completion on DEP Form 62-701.900(2) (attached as Exhibit B) for this facility. This certification shall be signed and sealed by the engineer of record or other professional engineer registered in the State of Florida. Upon submittal of this certification, the permittee shall contact the Department to arrange for an inspection with the engineer and the on-site facility operator.

Issued this 1st day of August, 1996

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Vivek Kamath

Vivek Kamath, P.E.
Waste Programs Administrator
Southeast District

VK/jl



Department of Environmental Protection

Lawton Chiles
Governor

AUG - 1 1996

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

Virginia B. Wetherell
Secretary

Mr. Alan N. Seideman
Zerowaste
2503 Ardath Road
La Jolla, California 92037

RE: Operation of Zerowaste system at dry-cleaning facilities

Dear Mr. Seideman:

I have received your letter dated July 15, 1996 and have the following comments:

(1) I have been unable to identify the staff member of the Southeast District Air Resources Management Program who spoke with you or your customers about regulation of the Zerowaste System. While the District's air permitting staff does evaluate requests for exemption from air permits on a case-by-case basis, exemption requests for many similar users of a process and state-wide requests for exemption are routinely handled by the Division of Air Resources Management's Bureau of Air Regulation in Tallahassee. This is done to ensure state-wide consistency in applying Florida's air regulation. If your process qualifies, the Division of Air Resources Management will issue an exemption letter. There was not such a letter included in the information you sent me, nor could our air permitting staff locate such a letter in our files.

In order to clarify the matter, I suggest that you refer your request for exemption from air permits directly to Mr. Clair Fancy, Chief of the Bureau of Air Regulation. An exemption letter issued by the Division office should be effective in all district and delegated local program offices, unless more stringent local ordinances are applicable in some part of the state. You can reach Mr. Fancy by mail at: Mail Station 55, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. You may reach the Bureau of Air Regulation by telephone at (904) 488-1344.


(2) Regarding the exemption of the Zerowaste unit from other aspects of the RCRA program, the previous correspondence referenced in your letter (letters from Mr. Satish Kastury dated 7/07/92, 10/24/94, and 7/14/95) accurately reflects the Southeast District's interpretation of the regulations. Please note that the unit is not "exempt" from all RCRA regulations, and the operator's generator status (that is, conditionally exempt small quantity generator, small quantity generator, or large quantity generator) determines which management regulations are applicable. These requirements are referenced in

the 7/14/95 letter and refer to the appropriate sections of 40 CFR Parts 261, 262, and 265. As stated above in item (1), the Southeast District will recognize state-wide interpretations of the applicability of RCRA regulations made in Tallahassee.

With regard to your concern that representatives of the Department are informing your customers that your systems "were not being operated legally", I do not have enough information to respond. If you are able to give more specific information (for example, the name and EPA identification number of the generator, the concentrations of contaminants in the feed to your system, the generator status of the operator of the equipment, and any other local permits issued to the operator of your equipment), I would be pleased to provide further comments.

I trust this adequately addresses your concerns at this time. If you need any additional information, please feel free to contact either Mr. Joe Kahn regarding air permit issues or Mr. John Jones regarding hazardous waste issues. Both of these individuals can be contacted at the Southeast District offices (telephone number 561-681-6600).

Sincerely,


Carlos Rivero-deAguilar Date 7/31/96
Director of District Management
Southeast District

✓
CRA/VK/jj

cc: Air Permit Section, SED, West Palm Beach
Clair Fancy, Bureau of Air Regulation, Tallahassee
Hazardous Waste Section, SED, West Palm Beach
Satish Kastury, Hazardous Waste Section, Tallahassee