

Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Scott Benyon, Deputy Assistant Secretary

CERTIFIED MAIL
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WARNING NOTICE

#WN90-0018-HW13SED

HW - Dade County

MAR 26 1990
Mr. Bob Omiecinski
Environmental Permit Writer
Safety-Kleen Corporation
777 Big Timber Road
Elgin, IL 60123

RECEIVED

MAR 28 1990

RE: Safety-Kleen Corporation/Medley
Construction Permit Application #HC 13-175466
Dade County
First Notice of Deficiencies
Class II Hazardous Waste Violations

HAZARDOUS
PERMITTING

Dear Mr. Omiecinski:

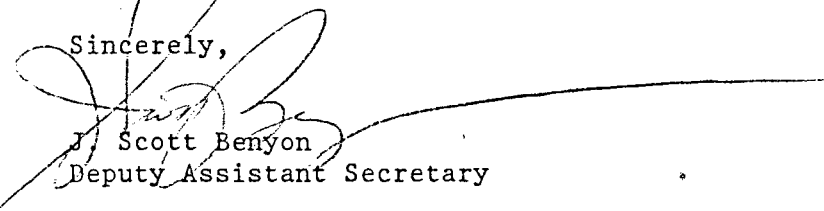
Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are listed in the attached Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 17-730.220 and Chapter 403.0876 Florida Statutes (F.S.)

The deficiencies noted in the enclosed Notice of Deficiencies constitute a violation of Department Rules. Failure to correct the deficiencies within thirty (30) days could subject you to a formal enforcement action including monetary penalties. If you cannot submit this information within thirty (30) days, you must provide a schedule with dates when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the Department will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, F.S., or take other appropriate actions.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or if you have any questions, please contact Knox McKee at (407) 964-9668.

Sincerely,


J. Scott Benyon
Deputy Assistant Secretary

JSB:km:rh/12

cc: James Scarbrough/EPA Region IV, Florida RCRA Activities, Atlanta
Satish Kastury, DER/Tallahassee (w/attachment)
Hazardous Waste Enforcement, DER/WPB

First Notice Of Deficiencies
Safety-Kleen Corporation/Medley
(I.D. Number Applied For)
Construction Permit Application HC 13-175466

Resubmittal Format: Resubmittal of information requested in this NOD must be in the form of revised texts, figures, tables, etc. and/or additional appendices. This will allow for the old pages to be removed and the new pages to be added. All revised submittals must include the revision number and date.

A response memo from the facility, listing DER's NOD items followed by the facility's response should be submitted along with the replacement pages.

GENERAL COMMENTS

17-730.900(2) Part I.A. General Information

1. 20. Please submit EPA/DER I.D. Number, upon completion of pending issuance.

17-730.900(2) Part I.B. Site Information

2. 3. Provide photographs of the proposed facility site showing the location of future storage areas.
3. 4.2 Submit a legible map indicating the facility's location within the 100-year floodplain area.

17-730.900(2) Part II.A. General

4. 1A. The maps provided in the application do not adequately depict the area of 100-year floodplain (illegible), orientation of the topographic map, contours sufficient to show surface water flow, drainage or flood control and runoff control system. Submit a map or series of maps (legible quality) which clearly detail the inadequately depicted site characteristics.
5. 1A. Provide a site specific surface water management plan.
6. 1B. Submit a wind rose of legible quality which includes the indication of legend and date.
7. 3. The proposed Safety-Kleen Service Center is shown (Exhibit I.B.5-1) to be located in Zone AH (EL.6). Zone AH is a special flood hazard area (SFHA) subject to inundation by the 100-year shallow flooding (usually areas of ponding) where average depths are between (1) one and (3) three feet. Identify the 100-year flood level and any other special flooding factors (e.g. wave action) which must be considered in designing, constructing, operating or maintaining the facility to withstand washout from a 100-year flood. Additionally, provide the following information:

- a) Engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100-year flood.
 - b) Structural or other engineering studies showing the design of operational units (i.e., tanks, incinerators) and flood protection devices (i.e., floodwalls, dikes) at the facility and how these will prevent washout.
 - c) If applicable, and in lieu of (a) and (b) above, a detailed description of procedures to be followed to remove hazardous waste to safety before the facility is flooded, including:
 - (1) Timing of such movement relative to flood levels, including the estimated time to move the waste to show that such movement can be completed before floodwaters reach the facility;
 - (2) A description of the locations(s) to which the waste will be moved and a demonstration that those facilities will be eligible to receive hazardous waste in accordance with the regulations under 40 CFR Parts 264 and 265;
 - (3) The planned procedures, equipment, and personnel to be used and the means to ensure that such resources will be available in time for use; and
 - (4) The potential for accidental discharges of the waste during movement.
- 8. 4.b The contingency plan which has been submitted states, "If the emergency coordinator determines that the facility has had a release...that could threaten human health or the environment outside the facility..." (I.E. 2-6), should be modified to state, "inside and outside the facility".
 - 9. 4.b The contingency plan, "Spill Control Procedures", (I.E. 2-14) must establish the provision for submitting reports of emergency incidents within (15) fifteen days of occurrence. A statement clarifying this timeframe requirement must be incorporated in the language.
 - 10. 4.b The contingency plan, "Procedures For Recordkeeping", (I.D. 6), must be expanded to include annual reports, land band notification/certification forms, waste minimization statement and transporter liability certification.

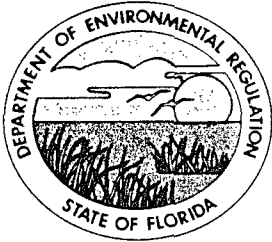
17-730.900(2) Part II.B. Containers

- 11. 1.b.1 Provide manufacturer's specifications which support that the containment area coating (Sikagard 62 or Concrecive 1305) material is compatible with all solvents with which it may contact. (Exhibit I.E. 3-10).
- 12. 1.b.1 Provide manufacturer's specifications which support that the sump liner (SK Part No. 5280) is compatible with all solvents with which it may contact. (Exhibit I.E. 3-10).
- 13. 6. The conceptual closure information provided appears adequate. When an actual Closure Permit Application is submitted for review the Department will require a more detailed closure plan.

17-730.900(2) Part II.C. Tanks

14. 2. Specify the nominal capacity (U.S. Gallons) and maximum capacity (U.S. Gallons) of the aboveground storage tanks.
15. 2. Exhibit I.E. 3-9 provides (2) two storage tank configurations (vertical installation and horizontal installation). Specify which configuration is to be used at the facility.
16. 4. Exhibit I.E. 3-7 does not detail which couplings will be used for drain line connection, vent line connection, fill line connection and high level alarm transmitter. Provide a drawing which supplies this information.
17. 6. Specify if the proposed aboveground storage tanks are to be newly constructed or used. If used tanks are proposed, submit the ages of all used tanks.
18. 7. Following the timely cleanup of an unsuspected release into the facility's containment area the facility must ensure that residual contaminants are not transported out of the containment system via the sump (Exhibit I.E. 3-6, section A-1) and discharged to a retention pond. It is recommended that the facility investigate installing an oil/water separator following the 6" gate valve and preceding discharge to the retention pond.
19. 7. Supply information on the actual tank configuration (vertical installation or horizontal installation) to be used and make all necessary adjustments in the tank displacement volume calculations. Provide the reference source and any calculations used to derive the rainfall allowance amount (Exhibit I.E. 3-6).
20. 11. Daily inspection of the aboveground storage tank system (I.E. 4-1) must include a visual inspection of tank bottoms (40 CFR 264.193(c)(3)). Modify and submit daily inspection log (I.E. 4-1) to include a visual inspection of the aboveground storage tank bottoms.
21. 12. The conceptual closure information provided would appear adequate with the inclusion of the information requested in comments #24-32. When an actual closure permit application is submitted for review the Department will require a more detailed closure plan.
22. 12. In the tank closure the final rinsate must be sampled and analyzed for mineral spirits, volatile organic compounds, lead and cadmium. (Pg. I.F. 1-3, 1.e. and Pg. I.F. 1-4, 2f).
23. 12. Surface soil samples (from beneath each dumpster) must be collected and analyzed for mineral spirits, volatile organic compounds and E.P. Toxic Metals (Pb, Cd, Cr)(Pg. I.F. 1-4, 2h).
24. 12. Contaminated soil must either be removed and properly disposed, the contamination eliminated using an alternate method (e.g. soil venting) or closed as a landfill (40 CFR 264.197(b)). (Pg. I.F. 1-4, 2i).
25. 12. Provisions must be made to prevent backfilling any excavated area with contaminated soil. It must be determined that excavated soil is clean prior to using it as backfill material. (Pg. I.F. 1-5, 3e (1)).

26. 12. Provisions must be made to contain and properly dispose all rinsate from tank interiors. (Pg. I.F. 1-5, 3a (3)).
27. 12. The final rinsate must be analyzed for mineral spirits, volatile organic compounds and metals associated with the waste stored in the tanks. (Pg. I.F. 1-5, 3c (8)).
28. 12. Provisions must be made to disconnect and decontaminate all appurtenant piping and pumping equipment, analyzing the final rinsate for mineral spirits, volatile organic compounds and metals associated with the waste stored in the tanks. (Pg. I.F. 1-5, 3d (1&2)).
29. 12. Testing for metals should be added to the soil sample analysis (Pg. I.F. 1-5, 3.d.(4)).
30. 12. Include language which states that if it is not possible to eliminate contamination the tank farm area must be closed as a landfill (40 CFR 264.197(b)). (Pg. I.F. 1-5, 3d (5)).



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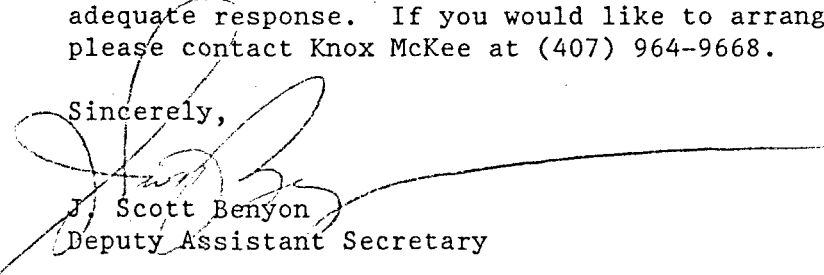
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