



**CURTIS F. McKNIGHT  
TESTING LABORATORIES, INC.**

TESTING and INSPECTION

7708 E. BROADWAY  
TAMPA, FL 33619  
www.mcknighttesting.com  
Phone: (813) 626-0287  
Fax: (813) 621-9610

(to verify validity of this document you may call the originator at (813) 626-0287. Many forms such as these are altered and may have differently appearing type in the fields for names, dates, etc. if in doubt contact originator).

**INSPECTION REPORT**

Date May 27, & June 14, 2011

Customer Safety Kleen

WO# 11-6588

Address 5309 24th Ave.

Type of Inspection Visual & Ultrasonic Inspection

Tampa, Fl. 33605

Applicable Specifications Per Customer Specification

Customer Purchase Order No. Customer

Description and/or Serial No. Dirty Parts Washer Solvent Tank

**RESULTS OF INSPECTION**

A site visit was made to perform Visual and Ultrasonic Thickness inspection on the 15,000 Gallon Tank listed above. This tank appears in good condition with no leaks noted and minor coating breakdown found on Tank Top. All nozzles showed no corrosion or indications of leakage. Ultrasonic Thickness measurements were taken on Shell, Tank Bottom and Tank Top using a Digiwork UM-1D device. Overall, tank condition is GOOD due to coating breakdown on Tank Top.

Prepared by Matthew D. Watford  
Matthew D. Watford Level II Technician

Approved by Ken C. McKnight  
Ken C. McKnight, CWI, Level III Technician

Page: of

## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Monday, June 20, 2011 4:28 PM  
**To:** Tripp, Anthony; Dregne, James; Honey, Kelly  
**Subject:** FW: Region B 7095 Boynton Beach BR  
**Attachments:** 1422\_001.pdf

Here it is.

merlin

---

**From:** Curtis, Jeff [<mailto:Jeff.Curtis@safety-kleen.com>]  
**Sent:** Monday, June 20, 2011 4:25 PM  
**To:** Russell, Merlin  
**Subject:** FW: Region B 7095 Boynton Beach BR

Hi Merlin,

Attached you will find the tank inspection for the Tampa used solvent tank. I am still trying to run down the RFA and will let you know when I locate it.

Thanks,

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)  
[www.safety-kleen.com](http://www.safety-kleen.com)

---

**From:** BoyntonBeachBR@safety-kl [<mailto:BoyntonBeachBR@safety-kleen.com>]  
**Sent:** Monday, June 20, 2011 4:07 PM  
**To:** Curtis, Jeff  
**Subject:** Region B 7095 Boynton Beach BR

## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Tuesday, June 07, 2011 10:09 AM  
**To:** Tripp, Anthony; Dregne, James; Honey, Kelly  
**Subject:** FW: SK Tampa Permit Application  
**Attachments:** SK Tampa South Container Storage Area 2.JPG; SK Tampa North Container Storage Area.JPG; SK Tampa Return Fill Area 2.JPG; SK Tampa Return Fill Area.JPG

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**From:** Curtis, Jeff [<mailto:Jeff.Curtis@safety-kleen.com>]

**Sent:** Tuesday, June 07, 2011 10:05 AM

**To:** Russell, Merlin

**Subject:** RE: SK Tampa Permit Application

Merlin, these are the last four photos.

**Jeff Curtis**

EHS Manager, Florida

Safety-Kleen Systems, Inc.

Office: (561) 738-3026

Cell: (561) 523-4719

Fax: (561) 731-1696

[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)

[www.safety-kleen.com](http://www.safety-kleen.com)

---

**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]

**Sent:** Tuesday, June 07, 2011 7:29 AM

**To:** Curtis, Jeff

**Subject:** SK Tampa Permit Application

Good Morning Jeff,

Tony handed me a CD yesterday with the electronic copy of your application. Although it contained the calculations for the secondary containment, the photos (Appendix A) were not included. Let me know what's happening. Thank you.

merlin

Merlin D. Russell Jr.

Professional Geologist II

Hazardous Waste Regulation Section, Room 310D

Florida Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, Florida 32399-2600

850.245.8796 (work)

[merlin.russell@dep.state.fl.us](mailto:merlin.russell@dep.state.fl.us)

Monday-Thursday, 7:00 am-4:30 pm, Fridays, 7:00-11:00 am

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*minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.*



## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Tuesday, June 07, 2011 10:07 AM  
**To:** Tripp, Anthony; Dregne, James; Honey, Kelly  
**Subject:** FW: SK Tampa Permit Application  
**Attachments:** SK Tampa South Container Storage Area.JPG; SK Tampa South Flammable Storage Room 2.JPG; SK Tampa South Flammable Storage Room.JPG; SK Tampa Tank Farm.JPG

FYI

---

**From:** Curtis, Jeff [<mailto:Jeff.Curtis@safety-kleen.com>]  
**Sent:** Tuesday, June 07, 2011 10:04 AM  
**To:** Russell, Merlin  
**Subject:** RE: SK Tampa Permit Application

Hello Merlin,

Attached are four of the site photos with the other 4 to follow. I am also sending hard color copies to yourself and the Southwest District. For some reason I could not download these to the CD.

Thanks,

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)  
[www.safety-kleen.com](http://www.safety-kleen.com)

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**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Tuesday, June 07, 2011 7:29 AM  
**To:** Curtis, Jeff  
**Subject:** SK Tampa Permit Application

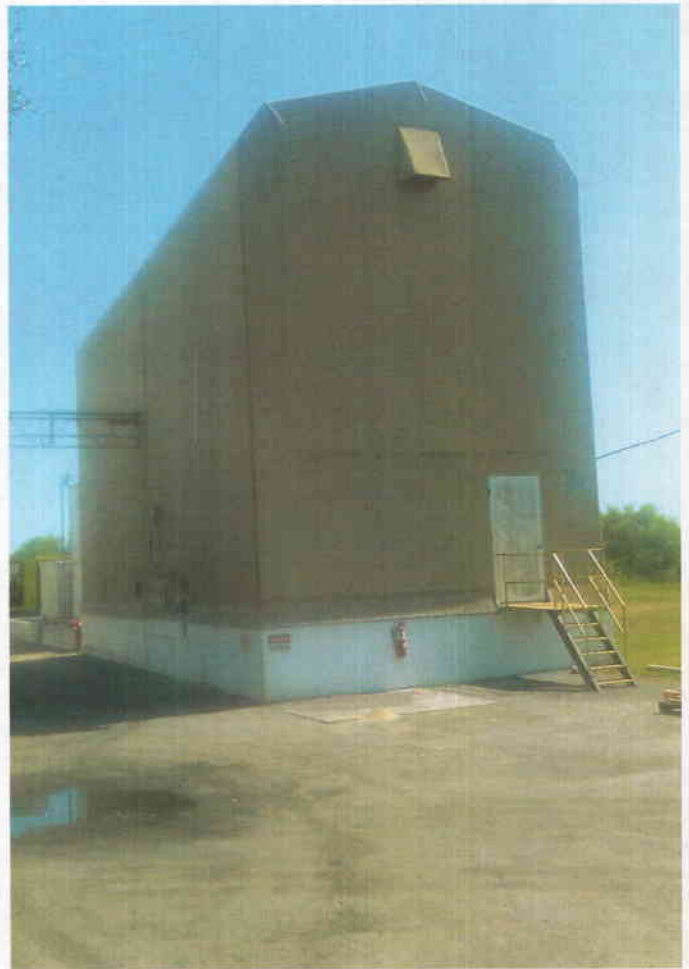
Good Morning Jeff,

Tony handed me a CD yesterday with the electronic copy of your application. Although it contained the calculations for the secondary containment, the photos (Appendix A) were not included. Let me know what's happening. Thank you.

merlin

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## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Wednesday, June 01, 2011 3:13 PM  
**To:** Honey, Kelly  
**Cc:** Dregne, James; Tripp, Anthony  
**Subject:** FW: Safety Kleen Tampa renewal

Hi Kelly,

Just following up on my earlier e-mail.

Also, please look over the SWMU list on page 101. I have never been to the site so where I need help from you is in answering the question: Has SK identified all Solid Waste Management Units (SWMUs)? Do they have any "generator" units? <90-day storage areas? SAAs? Aerosol can crushers? Drum crushers? Fluorescent bulb crushers? We normally don't include dumpsters unless they have managed stuff in them they should not have managed. If you think there might be some out there but are unsure, feel free to call and discuss. Thank you.

merlin

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**From:** Russell, Merlin  
**Sent:** Wednesday, May 25, 2011 3:33 PM  
**To:** Dregne, James; Honey, Kelly; Tripp, Anthony  
**Cc:** Kothur, Bheem; Echevarria, Edgar  
**Subject:** Safety Kleen Tampa renewal

Hi All,

Jeff Curtis stopped by and dropped off a copy of their renewal and the check so the clock is ticking. Day 60 is July 24 (Sunday) so we probably have until July 25th. I am hoping to complete my review by June 10 because I have other renewals coming in on June 13 and 24.

Kelly, I would appreciate any comments you have. I have never been to the facility so please let me know if you see something inconsistent with your previous inspections. If necessary, I want to go with the NOD before I leave June 30<sup>th</sup> for vacation. Tony and I talked to Jeff, and there should be no surprises. Is there any chance I can have comments from you by June 27? Obviously, I have no idea of your workload, vacations, etc. Please let me know.

merlin

Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation Section, Room 310D  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2600  
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Monday-Thursday, 7:00 am-4:30 pm, Fridays, 7:00-11:00 am

## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Wednesday, June 01, 2011 11:00 AM  
**To:** Tripp, Anthony; Dregne, James; Honey, Kelly  
**Subject:** FW: SK Tampa Tank Assessment status

FYI. The assessment should have been in their renewal but was not.

---

**From:** Curtis, Jeff [<mailto:Jeff.Curtis@safety-kleen.com>]  
**Sent:** Wednesday, June 01, 2011 10:56 AM  
**To:** Russell, Merlin  
**Subject:** RE: SK Tampa Tank Assessment status

Merlin,

The tank inspection was completed last Friday May 27. I will call the inspector today and see when he will get the report to me.

Thanks, Jeff

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)  
[www.safety-kleen.com](http://www.safety-kleen.com)

---

**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Wednesday, June 01, 2011 8:30 AM  
**To:** Curtis, Jeff  
**Subject:** SK Tampa Tank Assessment status

Jeff,

What is the status of the tank assessment? When can we expect it?

merlin

Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation Section, Room 310D  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
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## Honey, Kelly

---

**From:** Russell, Merlin  
**Sent:** Friday, May 27, 2011 10:00 AM  
**To:** 'Curtis, Jeff'  
**Cc:** Honey, Kelly  
**Subject:** RE: SK renewal training program  
**Attachments:** Table 6.1-12.doc

Jeff,

I'll replace the old page with this new one. I have found a couple of other typos that probably need to be corrected but I'll wait until the end and send them to you all at once. I realize how difficult it is to submit a document of this size without error. I prepared a couple of Part Bs when I worked at WRSCompass.

merlin

---

**From:** Curtis, Jeff [<mailto:Jeff.Curtis@safety-kleen.com>]  
**Sent:** Friday, May 27, 2011 9:55 AM  
**To:** Russell, Merlin  
**Subject:** RE: SK renewal training program

Hi Merlin,

Yes you are correct and I have revised the Table to reflect it as Table 6.1-12 and is attached. I will be posting the electronic copy of the document either later today or first thing Tuesday morning. Have a nice holiday weekend.

Thanks, Jeff

**Jeff Curtis**  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.  
Office: (561) 738-3026  
Cell: (561) 523-4719  
Fax: (561) 731-1696  
[jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com)  
[www.safety-kleen.com](http://www.safety-kleen.com)

---

**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Friday, May 27, 2011 8:28 AM  
**To:** Curtis, Jeff  
**Subject:** SK renewal training program

Jeff,

I hope you made it back safely and enjoyed the long weekend.

In your training program discussions, in the first paragraph at the top of page 46 there is a reference to Table 6.1-12. I'm guessing the table identified as "6.1-15" is the table being referenced, and this is a typo? Otherwise, Tables -12, -13 & -14 are missing. Let me know. Thanks.

merlin

Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation Section, Room 310D  
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## Honey, Kelly

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**From:** Russell, Merlin  
**Sent:** Wednesday, May 25, 2011 3:33 PM  
**To:** Dregne, James; Honey, Kelly; Tripp, Anthony  
**Cc:** Kothur, Bheem; Echevarria, Edgar  
**Subject:** Safety Kleen Tampa renewal

Hi All,

Jeff Curtis stopped by and dropped off a copy of their renewal and the check so the clock is ticking. Day 60 is July 24 (Sunday) so we probably have until July 25th. I am hoping to complete my review by June 10 because I have other renewals coming in on June 13 and 24.

Kelly, I would appreciate any comments you have. I have never been to the facility so please let me know if you see something inconsistent with your previous inspections. If necessary, I want to go with the NOD before I leave June 30<sup>th</sup> for vacation. Tony and I talked to Jeff, and there should be no surprises. Is there any chance I can have comments from you by June 27? Obviously, I have no idea of your workload, vacations, etc. Please let me know.

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Monday-Thursday, 7:00 am-4:30 pm, Fridays, 7:00-11:00 am



May 25, 2011

Hand Delivered

Mr. Merlin Russell Jr.  
Professional Geologist II  
Hazardous Waste Permitting  
Florida Department of Environmental Protection  
P.O. Box 3070  
Tallahassee, FL 32399

Dep. of Environmental Protection  
MAY 27 2011  
Southwest District

**RE: Safety-Kleen Systems, Inc. Tampa Facility – 5309 24<sup>th</sup> Avenue South, Tampa  
FL, 33619; EPA ID# FLD 980 847 271; Hazardous Waste Operating Permit  
Renewal Application**

Dear Mr. Russell:

Safety-Kleen Systems, Inc. is submitting the enclosed copy of the above-referenced Operating Permit Renewal application. Also enclosed is the \$10,000 application fee. I am also sending a copy to the FDEP Southwest District.

If you have any questions or comments, please contact me at 561-738-3026, or 561-523-4719.

Best regards,

Jeff Curtis  
EHS Manager  
Safety-Kleen Systems, Inc.  
5610 Alpha Drive  
Boynton Beach, FL 33426

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
MAY 27 2011  
SOUTHWEST DISTRICT  
TAMPA



CHECK NO: 10854182

Invoice Number	Invoice Date	Document Number Text	Gross Amount	Discount	Net Amount
1744H0005	02/21/2011	1900964463 - FEDEX JC	10,000.00	0.00	10,000.00
		Check Total .....			\$ 10,000.00
ENDOR:	202957	FLORIDA DEPARTMENT OF ENVIRON			



Safety-Kleen Systems, Inc

JP Morgan Chase Bank N.A

70-2322

719

10854182

5360 Legacy Drive

Building 2, Suite 100

Plano, TX 75024

Chicago, Illinois

000941591

DATE: 05/06/2011

\$ \*\*\*\*\*10,000.00

VOID AFTER 90 DAYS

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D FLORIDA DEPARTMENT OF ENVIRON  
 HE POST OFFICE BOX 3070  
 ORDER TALLAHASSEE FL 32315-3070  
 F

Authorized Signature

Authorized Signature

## Honey, Kelly

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**From:** Epost HWRS  
**Sent:** Thursday, June 30, 2011 12:38 PM  
**To:** Jeff.Curtis@Safety-Kleen.com  
**Cc:** Bahr, Tim; Goddard, Charles; Dregne, James; Echevarria, Edgar; Honey, Kelly; Russell, Merlin; Tripp, Anthony  
**Subject:** Safety-Kleen Systems, Inc. FLD 980 847 271, First Notice of Deficiencies  
**Attachments:** 6-30-11-Safety Kleen-Tampa final First Notice of Deficiencies.Receipt.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)

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Florida Department of  
Environmental Protection  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

June 30, 2011

**Sent Via Email**

[Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)

Mr. Jeff Curtis  
Safety-Kleen Systems, Inc.  
5309 24th Avenue South  
Tampa, Florida 33619

**Subject: Safety-Kleen Systems, Inc. FLD 980 847 271, Operating Permit No. 34744-  
HO-005  
Hillsborough County  
First Notice of Deficiencies**

Dear Mr. Curtis:

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 itemized in the enclosed Notice of Deficiencies.

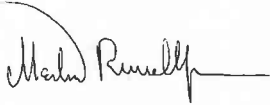
When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-730.220 and Chapter 403.722, Florida Statutes (F.S.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

Mr. Jeff Curtis  
June 30, 2011  
Page 2 of 11

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 have any questions, please call me at 850-245-8796 or [merlin.russell@dep.state.fl.us](mailto:merlin.russell@dep.state.fl.us)

Sincerely,



Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation

MR/mdr  
Enclosure

cc via e-mail w/enclosure:

Jim Dregne, FDEP Tampa, [James.Dregne@dep.state.fl.us](mailto:James.Dregne@dep.state.fl.us)

Edgar Echevarria, FDEP Tallahassee, [Edgar.Echevarria@dep.state.fl.us](mailto:Edgar.Echevarria@dep.state.fl.us)

Kelly Honey, DEP Tampa, [Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)



**ENCLOSURE**  
Safety-Kleen Systems, Inc.  
Operating Permit No. 34744-HO-005  
Hillsborough County

**General Comments:**

1. Any revisions to the Part B in one location must be done throughout the document. As an example, any changes to the "External Factors" paragraph must be done on pages 30-31, 72, 87 and any other places throughout the Part B. Although this NOD tries to point out multiple locations throughout the Part B where identical changes are required or suggested, it is the responsibility of Safety Kleen to ensure changes are made throughout the Part B.
2. Revised pages or sections can be submitted to replace pages in the 5/27/11, Revision 0 Part B. Any revisions must be identified as Revision 1 on each page.

**General Comments on Part II.K Closure**  
(Page/paragraph or section)

3. (94/3): Here and elsewhere, if contaminants in the rinseate are known to be from a listed hazardous waste, then TCLP would not need to be performed for the purposes of a hazardous waste determination, i.e., the rinsewater would be hazardous by the mixture rule. However, TCLP or other analyses may be desired by the recipient of the waste.
4. (97/2) If site assessment, interim measures or corrective action is required, these actions must be done in accordance with Chapter 62-780, F.A.C. and permit requirements.
5. (97/3 and elsewhere) As was noted above for the rinseate (above), if contamination on the concrete (or any other debris or discarded material) is known to be from a listed hazardous waste, then TCLP would not need to be performed for the purposes of hazardous waste determination, i.e., the concrete would be hazardous by the mixture rule.
6. (98/4) Florida no longer has closure permits. Closure would be performed in accordance with your closure plan submitted with this Part B. Your closure plan lacks some of the details that would normally be included if you were preparing to close at this time. However, for this operating permit, a less detailed plan is acceptable although a few specific requirements/clarifications are identified below. If and when you intend to close, we recommend that you notify the Department as soon as practicable. At that time, we can mutually work out any remaining closure details

based upon site-specific circumstances, and current regulations and guidance. Requirements for postclosure care (if needed) can be discussed at that time.

7. A "solid waste management unit" (SWMU) includes any unit which has been used for the treatment, storage, or disposal of solid waste at any time, irrespective of whether the unit is or ever was intended for the management of solid waste including RCRA regulated hazardous waste management units. SWMUs include areas that have been contaminated by routine and systematic releases of hazardous waste or hazardous constituents, excluding one-time accidental spills that are immediately remediated and cannot be linked to solid waste management activities (e.g., product or process spills).

**Specific Comments:**

(Page/paragraph or section)

**Part I**

8. Part I.A.10: Billy Ross signed as the Operator on the certification page of the April 1 renewal, and he needs to be identified as the Operator on the Part I. Ensure that his address and phone number are also used in this section.

9. Part I.A.11: Billy Ross signed as the Owner on the certification page of the April 1 renewal, and he needs to be identified as the Owner on the Part I. Ensure that his address and phone number are also used in this section.

10. Table 2.2-2, page 11 of 11 is blank. Was something left out or should this table be only 10 pages in length?

11. Part I.B.1: Update the coordinates for the facility. A better representation of the facilities location would be 24° 55' 34" N, 82° 23' 39"W.

12. Part I.B. Site Information, page 3: The application incorrectly states that there are no water bodies within ¼ mile of the facility. There appear to be at least three water bodies within that distance from the facility. Update the application accordingly.

13. Part I.B.3 (page 1) The application states that Fluid Recovery Service (FRS) wastes are transfer wastes (i.e., 10 days maximum allowed). These wastes must be specifically spelled out. The list of "examples" included on page 7 is nearly the same as the examples of permitted wastes. Your application must be revised to specify how the wastes differ and how Safety-Kleen differentiates when the wastes are on site.

## **Part I.D Operating Information**

14. The following comments are on used oil:

1. Apparently the site has converted one of its solvent Above-ground Storage Tanks (AST) (not the hazardous waste AST) to a used oil AST, and is now storing up to 15,000-gallons of used oil on site. Safety Kleen registered as a used oil transfer facility in January 2011 but has not registered the change in the type of product stored with the Department's Storage Tanks Program as required by subparagraph 62-762.451(1)(b)3, F.A.C.
2. Additionally, Safety-Kleen must update the emergency response arrangements, send out the revised contingency plan, etc., if it has not yet done so.
3. The hazardous waste solvent AST is referred to on the site sketches and throughout the application (e.g., in the contingency plan) as "used solvent". The tank should more appropriately be called the "hazardous waste solvent" AST and the CP should state it contains hazardous waste.
4. The application states that the used oil is taken to the TransFlo terminal "on an as needed basis." Although we concur that it should be an "as needed basis" the application should also state "but at least every thirty-five days, as specified in 40 CFR 279."

15. Figure 2.2-5 shows the HW management areas. The return/fill station area is designated as a "tank storage waste management area" which is partially correct because the fills for the HW AST are here, but containers are also managed in this area (staged for dumping, satellite containers, etc.) and also in the loading docks. The figure must be updated to show container management in this area.

16. Page 6 states "Most of the 150 solvent used by customers will be utilized by the Branch for the washing of used containers." This is not correct. See comment 27 on the CUP program below.

17. Part I D 3, (page 9) The table included in the Part B is different than the information required by the hazardous waste permit application (Form 62-730.900(2)(a)). As an example, your table does not include the "Process design Capacity and Units of Measure" required by the application. The table must be reformatted and identical to the table in Part I D 3. [Note: if the new table uses a single asterisk (\*), ensure it is identified in the notes at the bottom rather than a single dot (•) which is a typo].

## **Part II A. General**

18. The Contingency Plan (CP):

1. The CP should contain a Table of Contents so that one can locate information quickly within the plan.

2. Throughout the permit application and in the CP, Safety-Kleen states that waste will be going to a "recycle center." We presume you mean a permitted TSD, but the application should explicitly say so.
3. Page 8 of the CP indicates types of dry cleaning wastes that are managed at the facility except lint although it is mentioned later in the plan as a part of the filter cartridges on page 50. Lint is also removed from lint traps and is technically a separate waste stream.
4. In the facility description and the contingency plan (9/4), Safety-Kleen indicates that the *area* storing universal waste lamps will be marked in accordance with paragraph 62-737.400(5)(b), FAC. The boxes or the lamps must be labeled, not the area in which they are stored (Page 53 correctly states the containers will be labeled). Safety-Kleen should be using the marking requirements required by 40 CFR 273.14(e).
5. (9/3) Safety-Kleen states that "...used products are basically fresh products with impurities of dirt and metals." DEP recommends including language such as, "They may also be contaminated with other solvents, such as aerosol brake cleaners." You should also refer to the used product as "waste product" because they are wastes.
6. Page 13 of the CP states "the Branch Manager or designee is the emergency coordinator" and then refers the reader to page iii. Page iii does not have the words "emergency coordinator" anywhere on it. This title must be added to page iii.
7. (19/2) This paragraph specifies that spills within the building will be cleaned up by personnel wearing respirators. If this is correct, then no change is required. However by putting this requirement in the CP, Safety-Kleen is committing to doing it every time. You may wish to rethink this language and use something more similar to what is written on page 20.
8. The section beginning on page 20, Tank Spills or Leakage, must be updated to include used oil and not just solvent.
9. The CP does not contain timeframes for loading/unloading trucks and vehicles. Safety-Kleen must propose a reasonable timeframe for unloading inbound containers and a reasonable timeframe for shipping outbound containers after loading onto a truck or vehicle.
10. A site sketch showing clearly marked evacuation routes and the location of the assembly area must be included.
11. When discussing the waste codes potentially carried by the spent solvent, there is no mention of F001. F001 must be included.
12. On page 53, under "Branch Generated Liquids and Solids (Debris)," there is no mention of the waste generated from cleaning out the wet dumpsters. It is mentioned elsewhere, but should also be mentioned here.
13. The CP does not explicitly discuss the prevention of contamination of water supplies (Part II.A.4.c(4)).



14. The CP does not address hurricanes (see additional comments below). Discussion of hurricanes would be very appropriate in the "External Factors" section located on page 30-31 (and pages 72, 87).

EPA's guidance entitled *Preparedness and Prevention Requirements for RCRA TSDFs (Response to Chemical Safety Board Recommendation 2007-01-I-NC)* was sent to Jeff Curtis on March 11, 2010. Based upon the guidance, FDEP is recommending that the plan be reviewed at least annually. We plan to have such a requirement in your new permit. In addition, we plan to require that an electronic copy (and subsequent revisions) be submitted to first responders each time a revision is approved.

You should visit EPA's *As Hurricane Season Begins: A Reminder to Minimize Process Shutdown Related Releases and to Report Releases In a Timely Manner*, located at: [http://www.epa.gov/region4/r4\\_hurricanereleases.html](http://www.epa.gov/region4/r4_hurricanereleases.html) for information on hurricane preparedness and EPA requirements.

19. The Waste Analysis Plan (WAP):

1. The WAP should reflect the use of waste analyses that generators supply (if any). (Part II.A.6). We suggest that the following language be inserted: "Safety-Kleen is responsible for reviewing all submitted information for accuracy and consistency. If analytical data provided do not support the waste profile completed by the generator, the waste will not be accepted."
2. (55/1) Does Safety-Kleen perform the "full analysis" for nonconforming material? If so, provide additional details on the process of characterizing such wastes.
3. (55/2) The WAP is silent on confirming waste profiles, with the exception of visually looking at certain wastes when they are still at the generators' sites (e.g., spent parts washer solvent, dry cleaning wastes). Safety-Kleen is ultimately responsible for the accuracy of every waste profile, including permitted and transfer wastes. Further, under 49 CFR 171.1, Safety Kleen is performing pre-transportation functions for their customers and is jointly responsible for ensuring compliance with materials classification, labeling, marking, packaging and preparation of shipping papers on behalf of their customers. Most of these customers are not registered with PHMSA and do not have staff that have USDOT hazardous materials training. We suggest the following sentence be added to the end of the Summary for the Job Description of the MSS (Table 6.1-4): "Safety-Kleen is liable for waste profiles and shipping papers supplied to the generator unless the generator's representative certifies under penalty of law that he has received training in USEPA hazardous waste regulations and USDOT hazardous materials regulations within the last three years and that he is fully aware that providing false information on a waste profile may subject him to civil and criminal penalties pursuant to federal and state law."
4. (56/1) Describe in more detail what is involved in an "environmental review".

5. (57/2 & 3 and elsewhere in this WAP) This section should clarify whether Safety-Kleen analyzes the collected samples or whether the samples are sent off to a lab for analysis or if both, which analyses are performed where.

20. Indicate all other federal laws that may apply to the issuance of the permit according to 40 CFR Part 270.3 (Part II.A.8).

#### **Part II.B Containers**

21. (68-69, and 92) The location of the underground pipe and unused tank containment area must be illustrated on one of the figures.

22. (69/3) For clarification, are the containment areas of the tank systems also sealed with Sikagard® 62 or equivalent? If so, it would be appropriate to add to the tanks information.

23. (70/2) Aisle space must be sufficient to inspect drums or to replace damaged or leaking drums at a site. The Department generally *recommends* 3' aisle clearance.

24. (71/1) If immersion cleaner, dry cleaning, paint waste and FRS containers are never opened at the Branch Office, then at what point is the characterization verified, if needed?

25. The inspection logs provided in Figure 8.4-1 are very specific (e.g., "total volume of 30 gal paint waste"). What logs does Safety-Kleen use for containers that contain other types of waste? Will these always be transfer wastes? It appears as though other types of wastes are manifested to Safety-Kleen in Tampa as the designated facility. Safety-Kleen may wish to amend the log to include a line for "other wastes volumes".

26. (75) Containers are inspected to verify that all container identification, dates, labels, etc., are attached and current, but there is no line specifically for this information. We recommend adding a line for all the bullets identified on page 75 to ensure that the inspector is checking all the required items.

#### **Part II.J Tank System**

27. The application should include your written Continued Use Program (CUP). The reference to washing containers on page 77 makes it sound like any returned solvent can be used as continued use solvent, and there is no mention of the CUP vat. Your former permit application (Appendix G) contains details on the vat and the barrel washers.

28. Figure 9.4-1, "Inspection Sheet for: Daily Inspection of Storage Tank System" identifies one tank as "Dirty MS Tank." If this is the HW storage tank, it should be

identified as such. Also the second tank is identified as the "Used Oil Tank" but it says "EMPTY" underneath in parentheses. Is this tank empty or in use? If it's empty now, does Safety-Kleen intend to use it in the future? If the answer is yes, they should remove the word "empty" from the inspection sheet.

## **Part II.K Closure**

29. There are minor inconsistencies in the descriptions between Part II.J and the "Facility Data" section. The sections need to be accurate and consistent. Some examples from page 92:

1. North Storage Area capacity-5,200 gal. vs. 5,197 gal.
2. South Storage Area capacity-41,220 gal. vs. 41,367 gal.
3. The South Overflow Pipe and containment capacity (containment area and pipe) is 5,491 gal. On page 68, the total containment is listed as 6,151 gal.

30. (94/first bullet) This paragraph states (for the south overflow pipe and containment system) "...if sufficient documentation exists..." decontamination will not be required. The application must be revised to identify what Safety-Kleen envisions as "sufficient documentation."

31. On page 96, there should be a note that the two regulated ASTs will be closed in accordance with Chapter 62-762, FAC.

32. (96/4<sup>th</sup> bullet) Safety-Kleen must include one additional sample under the tanker connections for a total of four samples. Depending upon the sample results, groundwater monitoring may also need to be performed.

33. (100) The closure cost estimates are not sufficiently detailed in order to determine if the costs are reasonable. One of the specific line items should include the cost of T&D of the wastes. The \$186,750 for mobilization and preparation for closure seems high without knowing more specifically the activities included in this category. It is also not clear if a contingency was included in the cost estimate.

## **Part II.P Information Requirements Regarding Potential Releases from Solid Waste Management Units and Part II.Q Information Requirements for Solid Waste Management Units**

34. Fifteen Solid Waste Management Units (SWMUs) are identified in the current permit (and Part B) but the locations of these SWMUs are not included in the Part B. A map showing the location of each SWMU is required. In addition, as discussed on June 8, 2011, SWMUs not listed in your Part B include:

1. Fluorescent Lamp Storage Area.

2. Non-flammable Waste Transfer Waste Area (located within SWMU-1 (Service Center Drum Storage Area and Associated Trench)).
3. Flammable Waste Transfer Storage Area (located within SWMU-10 (Drummed Flammable Waste Storage Room)).
4. Satellite Accumulation Area (SAA) (located within SWMU-3 (Solvent Return Wet Dumpsters)).
5. Less than 90-day storage area (located within SWMU-10 (Drummed Flammable Waste Storage Room)).

You should carefully determine if there are other SWMUs at your facility. Common examples include, aerosol can and drum crushers, fluorescent bulb crushers, used oil management areas, etc. Part II.P and Q information requirements for each new SWMU must be submitted.

#### **Part II.R Process Vents and Part II.S Requirements for Equipment**

35. There is already a comment on the poor quality of Figure 11.1-1. This figure also needs to be updated along with being made legible.
36. Part II.S, Page 103: Provide information on how the 2,000 ppm vapor phase concentration was calculated.
37. Part II.S, Page 105: To what does Method 21 refer?

#### **Appendix A, Site photographs**

38. The clarity of the photos is poor. We would recommend submitting clear photographs with explanations. Ideally, the explanation should indicate the name of the area being photographed, any significant features, the direction of the photograph (e.g., facing north), the name of the photographer and the date of the photo.

#### **Appendix C Containment Calculations**

39. Volume calculation. Page 3 of 5 for South CSA (non-flammable). It appears that two different heights are averaged in the volume calculation. Please explain the need to add two heights and divide by two to obtain a height for the calculations.
40. Tank Containment: Page 3 of 4. The units for the Volume of Largest Tank need to be in ft<sup>3</sup>, not gallons.

#### **Appendix D Subpart BB and CC information**

41. (103) Regarding the Subpart BB requirements and the components diagramed in Figure 11.1-1, the figure is too small to adequately discern all the unique numbers given



to each component and the list is difficult to read. The figure and list must be re-done so that each can be clearly read.

42. Safety Kleen's contention is that all fluids are heavy volatile mixtures. Please provide documentation and calculations to support this contention.

43. Page 108 states that Figure 2.2-5 depicts the location and types of hazardous waste management units subject to Subpart CC, and also references the "indoor storage tank farm." There is nothing about Subpart CC on Figure 2.2-5, nor is there any reference to an indoor storage tank farm. The Department is unsure what is meant by either of these statements. Subpart CC containers must be managed anywhere Safety Kleen receives containers (e.g., loading docks, return/fill) and anywhere Safety Kleen stores them (with the possible exception of the corrosives and reactives).

44. Table 11.2-1 indicates the waste codes associated with the hazardous waste AST and again, there is no mention of F001 (See comment 11)

45. Page 110 references Table 11.2-2, but there is no Table 11.2-2 in the application.

46. (110) It is unclear which assessment Safety-Kleen is talking about. Is it the API 10-year assessment or something to do with Subpart BB/CC?

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1. Safety Kleen has (presumably) authorized its transportation compliance consultant, JJ Keller ([www.jjkeller.com](http://www.jjkeller.com)), to fill out the notification forms regarding transport of used oil and hazardous wastes. The consultant keeps putting the JJ Keller information (i.e., mailing address, phone numbers and contact person) in the Facility information of Line 6 of the 8700-12FL. I spoke to Jeff Curtis about this after my last inspection, and he told me he did not want JJ Keller's info there (he also said he would speak to them about it). He certainly doesn't want people calling Brenda Schaffer at JJ Keller, or anyone else but him about issues related to the facility. I know this is technically an issue between SK and JJK, but I think it's annoying also since it then prints the wrong info on all my SWIFT reports and I have to change it anyway. Can't we make them put accurate information on the 8700-12?
2. There are a lot of redundancies throughout this permit application, including duplicate figures and tables and the same text repeated over and over again. It was a lot of extra reading!
3. Appendix A is supposed to contain site photos, but my copy has no photos. – Note: photos received via email on 06-07-11. Hard copy is supposedly following.
4. The application states that Fluid Recovery Service (FRS) wastes are transfer wastes (i.e., 10 days maximum allowed). **I would like these wastes spelled out.** During the last inspection, I had an almost impossible time trying to figure out which wastes were allowed to remain longer than ten days and which were not and did not receive what I thought was a satisfactory answer regarding what the FRS wastes actually are. I basically ended up taking their word about them not being stored too long and that where they are located is appropriate.

The list of "examples" included on page 7 is pretty much the same as the examples of permitted wastes. How do the wastes differ and how does SK differentiate when the wastes are on site?

5. Apparently the site has converted the one of its solvent ASTs (not the HW one) to a used oil AST and is now storing up to 15,000-gallons of used oil on site. It registered as a used oil transfer facility in January 2011, but has not registered the change in the type of product stored with the Department's Storage Tanks Program as required by 62-762.451(1)(b)3, FAC.

Additionally, they have to redo the emergency response arrangements, send out the revised contingency plan, etc., if they have not yet done so.

Is there some reason why the hazardous waste solvent AST is referred to on the site sketches and throughout the application (e.g., in the contingency plan) as "used solvent?" I think it should be called the "hazardous waste solvent" AST and that the plan should state it contains hazardous waste.

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6. Also, the application states that the used oil is taken to the TransFlo terminal “on an as need basis.” First of all, I think it should be an “as *needed* basis” and second, I think it should also state “but at least every thirty-five days, as specified in 40 CFR 279.”
7. Figure 2.2-5 shows the HW management areas. The return/fill station area is designated as a “tank storage waste management area” which is partially true since the fills for the HW AST are here, but containers are also managed in this area (staged for dumping, satellite containers, etc.) and also in the loading docks.
8. Page 6 states “Most of the 150 solvent used by customers will be utilized by the Branch for the washing of used containers.” MOST? This is not correct. See comments on the CUP program below.
9. Under Part I D 3, the table below is presumably the table completed as part of Form 62-730.900(2)(a). First, this is not clearly explained. Second, the table in the application is in a different format than the table in the Form (different headings, etc.). Third, there is no single asterisk (\*). I assume that the single dot (•) is a typo.
10. In the facility description and the contingency plan, they indicate that the *area* storing universal waste lamps will be marked in accordance with 62-737.400(5)(b), FAC. The boxes or the lamps must be labeled, not the area in which they are stored. Later, page 53 states the containers will be so labeled. Additionally, I was under the impression that since 62-730, FAC, and adopted 40 CFR 273 after 62-737, the federal labeling language supersedes the state language. I think if they are going to reference a labeling requirement, they should be using 40 CFR 273.14(e).
11. Page 8 of the contingency plan indicates which type of dry cleaning wastes are managed at the facility, but there is no mention of lint. It is mentioned much later in the plan as a part of the filter cartridges on page 50, but it is also removed from lint traps and is technically a separate waste stream.
12. Throughout the permit application and in the contingency plan, they state that waste will be going to a “recycle center.” What exactly does this mean? I assume they mean a permitted TSD, but I think they should state that.
13. On page 9 of the contingency plan they state that “used products are basically fresh products with impurities of dirt and metals. I think they should include something like, “They may also be contaminated with other solvents, such as aerosol brake cleaners.” I also think they should be referring to the used product as “waste product” since it is a waste.
14. Page 13 of the contingency plan states “the Branch Manager or designee is the emergency coordinator” and then refers the reader to page iii. The page does not have



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the words "emergency coordinator" anywhere on it. This language needs to be added to the page.

15. Page 19 of the contingency plan specifies that spills within the building will be cleaned up by personnel wearing respirators. This seems an unlikely. I doubt that a respirator would be worn in most of the small scale cleanups that would occur, but by putting it in the plan they are committing to doing it every time. I think they might want to rethink this language and go with something more like what they wrote on page 20.
16. The section beginning on page 20, Tank Spills or Leakage, needs to have language that includes used oil and not just solvent.
17. Have not yet seen requirements for loading / unloading: i.e., inbound containers must be unloaded to appropriate area within x days; outbound containers must be shipped within x days of loading onto truck.
18. Recommend adding a site sketch with evacuation routes drawn in and the locations of the assembly area clearly marked.
19. When discussing the waste codes potentially carried by the spent solvent, there is no mention of F001. When we see manifests or other disposal records for hazardous spent SK parts washer solvent, they usually carry the codes D039 and D040. If these constituents are present in the spent solvent, it should be coded as F001, right? It seems like if it fails TCLP for perc or TCE, it would meet the F-listing definition, wouldn't it? For chlorinated solvents used in degreasing? They claim that their customers needing to use a manifest will receive assistance in filling it out properly.
20. On page 53, under "Branch Generated Liquids and Solids (Debris)," there is no mention of the waste generated from cleaning out the wet dumpsters. It is mentioned elsewhere, but should also be mentioned here.
21. There's a small typo on page 54, paragraph 1: "...have been *use* before..."
22. There is nothing in the Waste Analysis Plan (WAP) that says they will confirm the profiles of any of the waste they receive, with the exception of visually looking at certain wastes when they are still at the generators' sites (e.g., spent parts washer solvent, dry cleaning wastes). The closest they come is on page 62 when they state that analyses are performed at the Safety Kleen recycle facilities (again, are these permitted TSDs or what?) to "safeguard the recycling process and to assure product quality" which implies that they are only analyzing the spent parts washer solvent.

SK picks up and is the designated facility for WAY more than just spent parts washer waste, including plating wastes, and other industrial process wastes. Just a couple of months ago they picked up what they were told was D002 acidic plating wastes from an auto repair shop (yes, an auto repair shop), which turned out to be highly reactive cyanide



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plating wastes which were also alkaline. Had this material been handled as the person calling for pick up (who was NOT the generator) stated, it could have possibly killed someone. The only reason it there was not a serious incident is because the Department intercepted the waste at the Tampa SK facility. (Frankly, it seems strange to me that they would not have sampled the waste just based solely on the fact the guy claimed it was plating waste yet the drums were at an auto repair shop!)

I was under the impression that the other permitted TSDs in the SWD were required to confirm a certain percentage of the profiles for wastes they receive. I think SK should be required to confirm a certain percentage of their received wastes, too.

23. The inspection logs provided in Figure 8.4-1 are very specific (i.e., "total volume of 30 gal paint waste"). What about containers that contain other types of waste? What about other wastes received (e.g., alcohol based process waste or corrosive plating wastes). Will these always be transfer wastes? It seems like plenty of other types of wastes are manifested to SK in Tampa as the designated facility. Should the log be amended to at least add a line for "other wastes volume?"
24. Also, page 75 states that the containers are inspected to verify that all container identification, dates, labels, etc., are attached and current, but there is no line specifically for this information. I guess it would be lumped under "condition of containers." I recommend putting a line for all the bullets identified on page 75 to ensure that the inspector is checking all the required items.
25. Still waiting on results of the tank assessments due every ten years. The regulated ASTs (the fresh solvent and the used oil (formerly solvent)) should have also been submitted along with the RCRA AST. The assessments are required by Rule 62-762.511(b)(2)(d), FAC, and must be performed in accordance with API 653. I think the API standard covers the RCRA AST also, even though it's not regulated under the Department's AST rule.
26. What happened to the description of the Continued Use Program (CUP)? The reference to washing containers on page 77 makes it sound like any returned solvent can be used as continued use solvent, and there is no mention of the CUP vat. The old permit application has details on the vat and the barrel washers in Appendix G. There does not appear to be anything similar in the new application.
27. Also regarding the CUP, I would like them to put their written program in the permit application. They do have one, I've read it several times, and it includes important things such as they can't sign up customers whose used solvents exceed the onsite washing needs (i.e., no sham recycling), the amount of solvent needed to wash the barrels, the training they provide to the CUP customers, how they identify the CUP units in the field, etc. They can add the written program in as an Appendix. I think this is important.

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28. Figure 9.4-1, "Inspection Sheet for: Daily Inspection of Storage Tank System" identifies one tank as "Dirty MS Tank." Is this the HW storage tank, and if so, why is it not identified as such? Also the second tank is identified as the "Used Oil Tank" but it says "EMPTY" underneath in parentheses. Is this tank empty or in use? If it's empty now, does SK intend to use it in the future? If the answer is yes, they should remove the word "empty" from the log template.
29. Regarding containment in the form of trenches under loading / unloading areas, etc., I did not see anything requiring those to also be sealed with a suitable coating. (I may have missed it.)
30. Page 94 states, "if sufficient documentation exists... [the south overflow pipe and containment system] will not require decontamination." What constitutes "sufficient documentation?"
31. On page 96, there should be a note that the two regulated ASTs will be closed in accordance with Chapter 62-762, FAC. I don't know when the regulated ASTs were installed or if they were installed with containment or not. One of the engineering drawings I looked at in the 2006 application *appears* to indicate that the ASTs were relocated in approximately 1991-1992? If so would that mean additional sampling would be needed for closure?
32. On page 96, they might want to consider adding a sample location just under the tanker connections, too, for a total of four samples. And a groundwater sample at one of the locations should also be obtained and analyzed.
33. On page 97, the second paragraph states that if soil contamination is determine to exist below the containment dike slab, an additional work plan will be prepared to guide the soil assessment, etc. This is too weak. First of all, I think they should take at least one water sample as indicated above. Second, the paragraph should say something more like "if contamination is determined to exist at the site, a site assessment shall be initiated and prepared in accordance with Chapter 62-780, FAC."
34. Regarding the list of SWMUs on page 101, a sketch with each SWMU identified by number would be REALLY nice. I don't know where a lot of these are supposed to be.  
  
Merlin asked specifically about additional SWMUs that aren't on the list on page 101. They do have SAAs, but they are next to the wet dumpsters, so I think they would count as part of #3. Also, like I said earlier, it looks like they may have relocated their ASTs so that might be another one. The original SWMU determination was done in 1989 they say. There are no lamp crushers, drum crushers or aerosol puncturing devices. Their own wastes are stored in the flammables room when the drums are filled.
35. Regarding the Subpart BB requirements on page 103 and the components diagramed in Figure 11.1-1, first of all, (in my opinion) the figure is too small to adequately discern all

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the unique numbers given to each component and you can barely read the list either. Second, I don't think I have ever been able to identify any of the individual components during an inspection of the facility, and I'm not convinced they can either. I think the height of the grated walkway is too low to easily get underneath, and the grate is too hard to see through.

Also I found vapor pressures for mineral spirits on line ranging from 0.16 to 1.6 kPa. How do we know it's what they say it is?

36. Page 108 states that Figure 2.2-5 depicts the location and types of hazardous waste management units subject to Subpart CC, and also references the "indoor storage tank farm." There is nothing about Subpart CC on Figure 2.2-5, nor is there any reference to an indoor storage tank farm. Not sure what is meant by either of these statements. Subpart CC containers would be managed anywhere they receive containers (e.g., loading docks, return / fill) and anywhere they store them (with the possible exception of the corrosives and reactives).
37. Table 11.2-1 indicates the waste codes associated with the HW AST and again, there is no mention of F001. (See comment 19)
38. Page 110 references Table 11.2-2, but there is no Table 11.2-2 in the application.
39. Page 110 states that the most recent tank assessment is included in Appendix D, but there is no assessment in Appendix D. Also, it's not clear which assessment they are talking about. Is it the API 10 year assessment or something to do with Subpart BB/CC.