



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

MAY 11 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Palm Beach County  
HW-Safety-Kleen Corp, Boynton  
RCRA

MAY 16 1995

Mr. Al Seyfer  
Regional Sales Manager  
Safety-Kleen Corporation  
129 South Kentucky Ave., Suite 701  
Lakeland, Florida 33801

Re: Palm Beach County - HW; Safety Kleen Corporation's Request for Modification of Hazardous Waste Operating Permit, Safety-Kleen/ Boynton, HO 50-195905 (Submitted on March 24, 1995) for Closure of Waste Antifreeze Tank; First Notice of Deficiency

Dear Mr. Seyfer:

The Department has reviewed your request for modification, as referenced. The Partial Closure Plan addresses closure of a 20,000 gallon storage tank which had been permitted to store spent ethylene glycol. The Tank was never used for ethylene glycol storage and contains only a small amount of water left from hydraulic integrity testing. Also included in the request were updated emergency contacts. Listed below are items the Department considers deficient or in need of further explanation prior to granting the requested modification:

1. Page I.D.2-5. It is stated that Safety-Kleen began offering the service for the collection of spent antifreeze from automobile service stations. The wastes are reportedly placed into carboys or containers by the customer. The carboys or containers are located on the customer's premises. The contents of the carboy, if nonhazardous, are pumped into a tanker truck and combined with used oil. The contents of the carboy, if hazardous, are pumped into 30- or 55-gallon containers. At the service center, it is placed in the container storage warehouse or transferred from tanker truck to tanker truck and held for shipment to a Safety-Kleen recycle center.

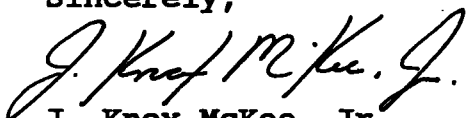
There is no explanation how the contents of the carboys are actually characterized as either hazardous or nonhazardous. There is no explanation provided as to the safeguards that Safety-Kleen uses to prevent characteristically hazardous contents of a carboy

or container to be inadvertently managed as nonhazardous. Please explain the analytical review process Safety-Kleen uses to screen the spent antifreeze for RCRA metals and organic constituents. Please include discussion on the sample size, provisions made to insure that the sampling (number of samples taken and technique) offers a sound representation of the sample population. Provide an explanation of the statistical test employed and the level of significance by which the samples are compared.

3. Page II.C.2-1. It is stated that the four of the five tanks located within the permitted secondary containment area, of the tank farm, are not considered Resource Conservation and Recovery Act (RCRA) tanks. Because the tanks are located within a RCRA unit their contents are regulated under RCRA authority. The contents of the tanks must be compatible with the contents of the tank containing RCRA hazardous wastes. The contents of the tanks must be clearly labeled and any changes of the contents must be authorized by the Regional Administrator of the RCRA program.
5. The modification requested impacts the closure cost estimate of record. Please review the closure cost estimate of record using the applicable portions of the enclosed worksheets (assume a worst case scenario). Provide an adjusted closure cost estimate developed to satisfy the appropriate portions of the worksheets.

Should you have any questions, please contact Manuel Delosantos or Knox McKee of this office, telephone 407/433-2650.

Sincerely,



J. Knox McKee, Jr.  
Supervisor, Hazardous Waste Section

cc: ~~Satish Kastury, DEP/Tallahassee~~  
Alan Farmer, EPA/Atlanta  
Permitting File/WPB