

M. HATUER



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VIA FEDERAL EXPRESS

HAZARDOUS WASTE PERMITTING

Mr. Knox McKee
Florida Department of
Environmental Regulation
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

RE: Minor Modification to the Operating Permit Application for Safety-Kleen Corp. Medley,
Florida Facility; Facility No. FLD 984171694

Dear Mr. McKee:

Safety-Kleen Corp. (Safety-Kleen) has recently obtained the rights from Exxon Corporation to market Exxon's Actrel® parts cleaner. This cleaner is similar to the parts washer solvents which are currently marketed by Safety-Kleen. Actrel® has a flash point of 212° F and consists primarily of paraffin compounds with C₁₂-C₁₄ chains. The Actrel® will be provided to customers in a manner similar to the way parts washer 105 and premium solvent are provided. The Actrel® machine is equipped with a filtration system. Periodically (approximately every 4 to 8 weeks), a Safety-Kleen representative will service the parts cleaner. During servicing, the used parts cleaner filter is removed and placed in a plastic closed tube which is positioned inside the Actrel® drum. The Actrel® drum is replenished with Actrel® solvent and a clean filter. It is currently anticipated that the Actrel® solvent will require replacement at the customer location two times per year. At the time of replacement, the used Actrel® will be poured into the wet dumpster at the branch; thereby being added to the Used Parts Washer Solvent Tank. The spent filters will be placed in the waste sludge accumulation container located at the wet dumpsters.

The Actrel® solvent will be managed as a hazardous waste unless a hazardous waste determination has been made which indicates that the waste is non-hazardous. It is not anticipated that this material will be a D001 waste.

In addition to the Actrel® modification, Safety-Kleen is also making a modification to its waste acceptance criteria for used parts washer solvent. Safety-Kleen has revised the acceptance criteria relative to color as follows:

The spent parts washer solvent is also visually inspected for its color. Unused parts washer solvent (Parts Cleaner 105 and Premium Solvent) has a greenish tint. The Actrel® parts cleaner is colorless. As the solvent (Parts Cleaner 105, Premium Solvent, and Actrel®) is used, it turns color. The specific color which the solvent turns is dependent upon the type of equipment being cleaned. For example, solvent used at automotive shops turns brown or black, while solvent used by silk screeners will turn 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.

13112.00/01/ACTREL.PF1/6

The attached pages reflect the addition of this product line to Safety-Kleen's operations. Instructions for updating the permit application are attached. The required \$250.00 minor modification fee is included.

If you have any questions, please call me at (813) 682-8094.

Sincerely,



Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

/pjh

Enclosure(s)

c: Mike Hatcher - FDER, Tallahassee (ltr only)
Cynthia Norton - ERM
Mike Redig - FDER, Tallahassee (ltr only)