

From: [Russell, Merlin](#)
To: [Curtis, Jeff](#)
Cc: [Cinquino, Dawn](#); [Baker, Bryan](#); [Blandin, Norva](#)
Subject: FW: "Boynton Beach Hazardous Waste Solvent Tank"
Date: Thursday, March 29, 2018 11:01:00 AM
Attachments: [image001.png](#)

Good Morning Jeff,

Per your permit:

“The Permittee shall report any changes, component replacement or extensive repairs to the tank system to the Department. This report will include the information required by 40 CFR 264.196(e). The tank system shall not be returned to service until the certification report as required by 40 CFR 264.196(f) has been submitted to the Department and approved.”

40 CFR 264.196(f): (f) *Certification of major repairs.* If the owner/operator has repaired a tank system in accordance with paragraph (e) of this section, and the repair has been extensive (*e.g.*, installation of an internal liner; repair of a ruptured primary containment or secondary containment vessel), the tank system must not be returned to service unless the owner/operator has obtained a certification by a qualified Professional Engineer in accordance with §270.11(d) of this chapter that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. This certification must be placed in the operating record and maintained until closure of the facility.

So, FDEP sees your proposal as a repair to your tank and it will require a report with PE certification. A permit modification is not necessary as long as Safety Kleen is not changing capacities, content, location or containment, or replacing the tank with a different tank.

If you have any questions, please feel free to contact our PE, Dawn Cinquino, directly. Her number contact info is:

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From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Wednesday, March 28, 2018 1:31 PM
To: Russell, Merlin <Merlin.Russell@dep.state.fl.us>
Subject: "Boynton Beach Hazardous Waste Solvent Tank"

Hi Merlin,

As we discussed on the phone, during a daily tank inspection we discovered the manway lid on the existing emergency vent on top of the tank has a small gap when closed (it does not sit flush on the base due to warping over the years). This is an emergency vent using long-bolted manway cover that would open if pressure built inside the tank. We would like the Department's guidance on whether or not a permit modification is necessary to perform the following fix: Tight-bolt the manway to the base, and install a flanged E-vent on the manway cover. If there are any questions let me know.

Thank you, Jeff

Jeff Curtis Sr. Environmental Compliance Mgr. | Safety-Kleen | A Clean Harbors Company
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