

Thursby, Kim

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Thursday, July 19, 2018 9:32 AM
To: Russell, Merlin
Cc: Thursby, Kim
Subject: RE: 07-11-18 First Request for Additional Information (RAI) Clay County – Hazardous Waste Facility Name: Safety-Kleen Systems, Inc. Facility ID: FLD 980 847 214 DEP Application No.: 0077130-HO-010

It was received, sorry for the delay.

Thank you

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Thursday, July 19, 2018 8:00 AM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Cc: Thursby, Kim <Kim.Thursby@dep.state.fl.us>
Subject: FW: 07-11-18 First Request for Additional Information (RAI) Clay County – Hazardous Waste Facility Name: Safety-Kleen Systems, Inc. Facility ID: FLD 980 847 214 DEP Application No.: 0077130-HO-010

Jeff,

Please let Kim know that you received this. Thanks.

merlin

From: Outley, Debra **On Behalf Of** Epost HWRS
Sent: Wednesday, July 11, 2018 9:45 AM
To: 'Jeff.Curtis@safety-kleen.com' <Jeff.Curtis@safety-kleen.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; Russell, Merlin <Merlin.Russell@dep.state.fl.us>; 'bastek.brian@epa.epamail.gov' <bastek.brian@epa.epamail.gov>; 'Merizalde.carlos@epa.gov' <Merizalde.carlos@epa.gov>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>; Fellabaum, Pamela <Pamela.Fellabaum@FloridaDEP.gov>; 'bob.fox@erm.com' <bob.fox@erm.com>; Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>
Subject: 07-11-18 First Request for Additional Information (RAI) Clay County – Hazardous Waste Facility Name: Safety-Kleen Systems, Inc. Facility ID: FLD 980 847 214 DEP Application No.: 0077130-HO-010

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting 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. (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.

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.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

July 11, 2018

Mr. Jeff Curtis
5610 Alpha Drive
Boynton Beach, Florida 33426
Jeff.Curtis@safety-kleen.com

Re: First Request for Additional Information (RAI)
Clay County – Hazardous Waste
Facility Name: Safety-Kleen Systems, Inc.
Facility ID: FLD 980 847 214
DEP Application No.: 0077130-HO-010

Dear Jeff:

Thank you for your application for an Operation Permit for the above referenced Facility. The Department has assigned DEP Application No. 0077130-HO-010 to the application. A Department staff review of the application and supporting documentation submitted on June 22, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, August 24, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to merlin.russell@floridadep.gov. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to merlin.russell@floridadep.gov, alerting us that it has been posted.

Mr. Jeff Curtis

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July 11, 2018

If you have any questions, please contact Merlin D. Russell Jr. by telephone at 850-245-8796 or by e-mail at merlin.russell@floridadep.gov.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

cc:

Brian Bastek, EPA Region 4, bastek.brian@epa.epamail.gov

Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov

Dawn Cinquino, FDEP Headquarters, dawn.cinquino@floridadep.gov

Pamela Fellabaum, FDEP Northeast District Office, pamela.fellabaum@floridadep.gov

Robert Fox, ERM, bob.fox@erm.com

Cheryl Mitchell, FDEP Northeast District Office, cheryl.mitchell@floridadep.gov

Attached: List of Requested Information

Attachment: List of Requested Information

Facility Name: Safety-Kleen Systems, Inc.
Facility ID: FLD 980 847 214
DEP Application No.: 0077130-HO-010

General Comments:

1. Any revisions to the Part B in one location must be done throughout the document. Although this RAI 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. It is our understanding that the Continued Use Program (CUP) has been discontinued. If this is the case, the Part B needs to eliminate all portions of the renewal that discuss the CUP.
3. In your response, ensure that you include a final electronic copy of your application.

Specific Comments:

4. Part I.B.3 indicates that the pickup of used solvent from the tanks occurs about once per week. The WAP (page 2, item 1.) indicates that the used solvent is removed about every 20 days. Reconcile the discrepancy.
5. Part I.D.3 Process-Codes and Design Capacities: It is our understanding that Safety Kleen does not generate the F001 and F004 wastestreams from the branch-generated debris. Those waste codes are included in the current permit and the most-recent 8700-12FL forms.
6. Figure 2.1-1 Site Layout, Figure 2.2-4 Legal Boundaries, Figure 2.2-5 Drainage Plan and Figure 2.2-6 Locations of Hazardous Waste Storage Areas: The legends include "Truck Traffic Patterns" but none are illustrated on these figures. As the traffic patterns are illustrated on Figure 2.1-2, the "Truck Traffic Patterns" could be removed from these figures.
7. Figure 2.2-5 Drainage Plan should identify the swale to the south of the property and the direction of stormwater flow in the swale.
8. Preparedness, Prevention, Contingency Plan, and Emergency Procedures...
 - a. Page 12, first bullet: If Safety Kleen has a contract with a cleanup contractor, the contact information for the company should be identified on page iii. If this is just a general statement about calling in a contractor to assist, then the text is fine as written.
 - b. The reporting section should include the reports required by permit conditions Part I.8 and Part V.2 (SWMU information).
9. Training:
 - a. Tables 6.1-3 and 4 for Secretary positions specifically list "...exhibit knowledge of Hazardous Waste regulations..." in the Position Overview section. Tables 6.1-2, 5, 6 for the Branch Manager and Material Handlers, positions that would be expected to be more involved with day-to-day hazardous waste management, do

not list that knowledge and more broadly state "...site EHS compliance..." in Position Overview. Recommend that any position that is responsible for oversight and/or management of HW include specificity about obtaining/maintaining knowledge of HW regulations.

10. Waste Analysis Plan: Page 5: Include discussions on the FRS Waste and Aqueous Brake Cleaner, similar in scope to the other wastestreams.
11. Part II.B, Containers
 - a. Containers: page 1, paragraph 4: According to the calculations included in Figure 8-2, the total containment capacity is 1,122 gallons for the storage shed, not 1,222 gallons. In Part II.K, Closure Plan, page 2, the containment capacity for the storage shed is correctly stated as 1,122 gallons.
 - b. Container Inspection: pages 8 and 9: Even though inspections are completed electronically, the manual form you reference and include in this section (Figure 8.4-1) appears to only include the volume of wastes in the Warehouse Container Storage Area. Since Safety-Kleen is also an LQG of HW and accumulates this waste in the Warehouse Container Storage area, please explain how the inspection records comply with 62-730.160(5), FAC, that requires also documenting "the number of containers."
12. Part II.C, Tank System, Page 2, last line: The application states that the "tank farm dike and return/fill station have been sealed with a chemical resistant coating." However, other portions of the application refer to a 23-year old memo (dated 1995) about a Canadian study of the average permeability of concrete that appears to indicate that no epoxy sealant is used at this facility. Please clarify whether an epoxy is used, where, and how often it is inspected to determine if resealing is needed. If no epoxy is used, please describe how the secondary containment areas meet the requirements of 40 CFR 264.175 for containers and 40 CFR 264.193 for tank systems; and 40 CFR 279.45 for used oil storage at transfer facilities and 62-710.401, FAC, for used oil management.
13. Part 2.K Closure Plan, Page 7, last sentence: The Sampling and Analysis Plan required by Subsection 62-730.225(3), F.A.C. no longer exists, and reference to it should be stricken from the Part B.
14. Part 2.S, Air Emission Standards, page 7, paragraph 2: The capacity of the tank is listed as 20,000 gallons. We believe this should be 15,000 gallons.