



Department of Environmental Protection

Lawton Chiles
Governor

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

RECEIVED
RCRA Virginia B. Wetherell
Secretary

JUN 07 1996

JUN 14 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jon Ercole, CHMM, Manager
Safety-Kleen Corporation
5610 Alpha Drive
Boynton Beach, FL 33426

Dear Mr. Ercole:

Safety-Kleen Corporation
First Notice of Deficiency
HO 50-287405
Palm Beach County - Hazardous Waste

Your application for a hazardous waste operation permit, received on April 8, 1996, has been reviewed and found to be incomplete. The required information to complete your application is itemized in the attached Notice of Deficiency (NOD).

When a permit application is incomplete, all processing of the application is suspended. You are advised to provide us with the requested additional information pursuant to Rule 62-730.220, Florida Administrative Code (FAC) and Chapter 403.0876, Florida Statutes (FS).

Please provide four (4) copies of your completed response to this office within thirty (30) days of receipt of this letter. If a complete response to each item is not received within the above time frame, the Department may begin formal proceedings to deny the permit, pursuant to Section 120, FS.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. If you have any questions regarding this letter, please contact me at (561)681-6674. Please note that this Notice of Deficiency does not include a review of the documents submitted to the Department with a cover letter from Mr. W.D. Phelps of Delta Environmental Consultants dated May 23, 1996, and received by the Department on May 24, 1996. These items will be reviewed and comments/deficiencies noted in a separate communication.

Sincerely,

John M. Jones, P.E.
Supervisor, Hazardous Waste Section

JJ/vp

Attachment

FDEP/WPB Hazardous Waste Section Permit File
Doug Outlaw, FDEP/Tallahassee
Kent Williams, RCRA Permitting, USEPA/Atlanta

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Deficiencies
Safety-Kleen (Boynton Beach)
Part B Renewal Application received April 8, 1996
Permit Number HO50-287405
EPA Identification Number FLD 984167791

1. General

Throughout the permit application, the notation "No changes subsequent to most recent approved modification to the permit" is used. Replace this language with the applicable date of the permit modification and include as an attachment or addendum all the modifications referenced. The Department will replace the sections modified from the permit application dated April 23, 1991. When coupled with the addendum mentioned above, the resulting document will be a "stand-alone" permit renewal application.

2. Item 9. DEP Form 62-730.900(2)(a)

The telephone number listed for the facility contact person appears to be incorrect. Please verify all facility information contained in this section.

3. Description of Facility Operation - Attachment I.D.2

(a) Describe procedures, including tanker cleaning prior to loading with fresh solvent, to ensure that the tanker truck delivering fresh solvent does not contain waste residues from previous transportation of spent solvent (including sludge or solids).

(b) References are made throughout the section to "transfer wastes". Describe the location of the transfer facility and reference the applicable regulations (40 CFR Part 263) and record keeping to be maintained for the transfer facility.

(c) Include a description of the facilities and procedures to be used for the management of spent mercury-containing lamps and devices destined for recycling per Rule 62-737, F.A.C.

(d) Page I.D.2-4. Describe procedures to ensure compatibility between waste streams to be mixed.

(e) Page I.D.2-5. It is not clear how the hazardous waste determination for ethylene glycol is made. Describe the documentation to be supplied by the generator(s) and provide examples of the Safety-Kleen shipping documentation for outgoing shipments. What analyses are performed by Safety-Kleen to ensure that proper waste characterization is performed?

(f) Attachment I.D.3-1. Define the criteria used to define "hazardous parts washer of a similar nature". How is waste compatibility ensured?

(g) Attachment I.D.3-1, footnote e. Describe the management of the used oil/ethylene glycol mixture. What facilities receive used oil from Safety-Kleen? Does Safety-Kleen inspect receiving facilities to assure compliance with Rule 62-710 F.A.C.?

Contingency Plan-Attachment IIA.4(b)

(a) Page II.A.4(b)-1 The Contingency Plan must be implemented in the event of any fire or explosion at the facility, regardless of the extent of the damage. Define the criteria used to determine "threat to human health or the environment". Note that confining the damage to Safety-Kleen property does not necessarily reduce the necessity to implement the Contingency Plan.

(b) Page II.A.4(b)-3 Provide justification for the statement that waste products exhibit essentially the same biological, physical, and chemical properties as the fresh product. While the matrix containing the impurities may be similar to fresh product, the presence of toxic metals can significantly affect toxicity of the waste product.

(c) Page II.A.4(b)-3 Define "approved containers". Reference the correct Department of Transportation citations.

(d) Page II.A.4(b)-6 Update the telephone numbers to include the correct FDEP Southeast District phone number (561) 681-6600 and the correct Florida State Warning Point number (800) 320-0519.

(e) Page II.A.4(b)-10 Describe the waste characterization procedures for soil contaminated by spills. What tests will be performed?

(f) Page II.A.4(b)-11 Update telephone numbers as previously noted.

Preparedness and Prevention Procedures - Attachment II.A.4(d)

(a) Page II.A.4(d)-2 Describe documentation of the inspections, including a description of the work order system used to verify that repairs are completed.

(b) Page II.A.4(d)-3 Describe procedures to insure that emergency and spill control equipment is inspected after each use.

(c) Page II.A.4(d)-7 Describe the source of power of the fork lift and any design features incorporated to minimize the possibility of its use providing a source of ignition of waste.

(d) Page II.A.4(d)-10 Support the statement that incompatible wastes are not handled at the facility. The process description implies that a wide variety of waste streams are managed at the facility. Several waste types (for example oxidizers and flammable wastes) are incompatible. Management of these wastes is acceptable with adequate safeguards to prevent mixing.

Personnel Training-Section II.A.4(e)

(a) Page II.A.4(e)-2 Quantify "several" weeks in reference to training for the Branch Managers.

(b) Page II.A.4(d)-3 Is training in the Waste Analysis Plan (WAP) also provided to facility personnel? It is not referenced and seems important to the facility operation. Who is responsible for monitoring compliance with the provisions of the WAP?

(c) Page II.A.4(d)-6 The documentation of training should include acknowledgment of the training (that is signatures) by both the trainer and the trainee.

Waste Analysis Report - Section II.A.5

(a) Page II.A.5-4 Supply TCLP data on the used premium solvent.

(b) Page II.A.5-5 Identify the Safety-Kleen facilities which will receive the sludge and mud and the processes used at these facilities (distillation, energy recovery, etc.)

(c) Page II.A.5-7 This page states that aqueous brake cleaner (ABC) will be managed as a transfer waste. The Department has received other requests from Safety-Kleen to mix the ABC with other waste streams. Please clarify the intended management method.

(d) Page II.A.5-7A Item 9 describes materials which will not be accepted. At what concentration levels will the materials be screened? What analytical methods will be used to determine content of the excluded materials (herbicides, PCBs, pesticides, and PBBs)?

Waste Analysis Plan - Section II.A.6

(a) Page II.A.6-3 Describe the analytical procedures used by Safety-Kleen to perform the referenced hazardous waste determination.

(b) Page II.A.6-9 How does Safety-Kleen determine the waste type (hazardous or non-hazardous) of antifreeze at the customer's place of business? If process knowledge is used, explain how the generator determines that benzene and lead content do not exceed regulatory levels.

Tank System Specifications - Attachment II.C.2

(a) Page II.C.2-1 Reference is made to blending aqueous brake cleaner. In other sections of the permit, the statement is made that ABC is managed as FRS waste. Please clarify.

Controls and Spill Prevention - Attachment II.C.9

(a) Page II.C.9-1 Reference is made to the possibility of corrosion at the solvent/water interface. Describe procedures to monitor the extent of corrosion and corrective actions if corrosion is detected.

RCRA Part B Permit Renewal Application, dated 4/1/96.
(NOTEBOOK)

RCRA Permitting Routing Slip

Facility Name: Safety-Kleen, Boynton Bch.

PATS No.: H050-195905

<u>TO</u>	<u>NAME</u>	<u>INITIALS</u>	<u>DATE</u>
_____	KASTURY, Satish	_____	_____
_____	Ashwood, Janet	_____	_____
_____	Outley, Debra	_____	_____
_____	RUSSELL, Merlin	_____	_____
_____	Land, Susan	_____	_____
_____	Graves, Shelton	_____	_____
_____	James, David	_____	_____
_____	Kaharoeddin, Ami	_____	_____
_____	Liu, Xinlan	_____	_____
_____	Madrid, Nicanor	_____	_____
_____	Papp-Wells, Joyce	_____	_____
_____	Smith, Cindy	_____	_____
_____	Stein, Carole	_____	_____
<input checked="" type="checkbox"/>	OUTLAW, Doug <i>Dist. Lead</i>	<i>DD</i>	<i>5/13/96</i>
_____	Budeir, Maher	_____	_____
_____	Griffin, John	_____	_____
_____	Fierison, Dennis	_____	_____
_____	Singh, Harbhajan	_____	_____
<input checked="" type="checkbox"/>	KOTHUR, Bheem	<i>BSK</i>	<i>5/15/96</i>
_____	Owutaka, Alex	_____	_____
_____	Prusty, Rabin	_____	_____
<input checked="" type="checkbox"/>	OTHER <i>ALINE</i>	<i>AKK</i>	<i>5-30-96</i>

REQUIRED ACTION & COMMENTS:

PROJECT MANAGER: Kothur
LOGGED IN: *[Signature]*

**RCRA PART B PERMIT
RENEWAL APPLICATION**



**BOYNTON BEACH SERVICE CENTER
5610 ALPHA DRIVE
BOYNTON BEACH, FLORIDA
FLD 984167791**

RECEIVED
RCRA

MAY 2 1996

PREPARED BY:



**DELTA ENVIRONMENTAL CONSULTANTS, INC.
5401 WEST KENNEDY BLVD., SUITE 400
TAMPA, FLORIDA 33609**

SAFETY-KLEEN CORPORATION
BOYNTON BEACH, FLORIDA SERVICE CENTER
RCRA PART B PERMIT RENEWAL APPLICATION

INDEX

Division	Section	Content
I.	Application for Renewal of Hazardous Waste Facility Permit - Part I	
	A.	FDEP Application Form 62-730.900(2)(a), pages 1-5 inclusive
	B.	Revised Part I Attachments - Revision #9
	<u>Attachment #</u>	<u>Title</u> <u>Pages</u>
	I.B.3	Facility Layout and Photographs I.B.3-1 to I.B.3-2
	I.D.2	Description of Facility Operations I.D.2-1 to I.D.2-5
	Table I.D.3-1	Waste Types I.D.3-1A(1) to I.D.3-1A(2)
II.	Application for Renewal of Hazardous Waste Facility Permit - Part II	
	A.	Part II, Section A - General: (pages 1-38 inclusive of FDEP permit review checklist modified to incorporate responses to Part II, Section A.)
		Revised Part II, Section A Attachments - Revision #9
	<u>Attachment #</u>	<u>Title</u> <u>Pages</u>
	II.A.4(b)	Contingency Plan and Emergency Procedures II.A.4(b)-1 to II.A.4(b)-17
	II.A.4(d)	Preparedness and Prevention Procedures II.A.4(d)-1 to II.A.4(d)-11
	II.A.4(e)	Personnel Training II.A.4(e)-1 to II.A.4(e)-17
	II.A.5	Waste Analysis Report II.A.5-1 to II.A.5-9
	II.A.6	Waste Analysis Plan II.A.6-1 to II.A.6-14
	B.	Part II, Section B - Containers: (pages 1-4 inclusive of FDEP permit review checklist modified to incorporate responses to Part II, Section B.)
		Revised Part II, Section B Attachments - Revision #9
	<u>Attachment #</u>	<u>Title</u> <u>Pages</u>
	II.B.3	Waste Segregation II.B.3-1 to II.B.3-4
	II.B.4	Container Management II.B.4-1 to II.B.4-2
	II.B.5	Container Inspection II.B.5-1 to II.B.5-2

RECEIVED
RCRA

MAY 2 1996

04/01/96