



# Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406

Lawton Chiles, Governor

Telephone: 407/433-2650

Carol M. Browner, Secretary

Fax: 407/433-2666

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

JUN 20 1991

WARNING NOTICE  
#WN91-0044-HW50SED  
HW - Palm Beach County

Mr. Scott E. Fore, Vice President  
Safety-Kleen Corporation  
777 Big Timber Road  
Elgin, IL 60123

RE: Safety-Kleen Corporation/Boynton  
Operating Permit Application #HO 50-195905  
Palm Beach County  
First Notice of Deficiencies  
Class II Hazardous Waste Violations

FLD984167791

Dear Mr. Fore:


Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are listed in the attached Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 17-730.220 and Chapter 403.0876 Florida Statutes (F.S.)

The deficiencies noted in the enclosed Notice of Deficiencies constitute a violation of Department Rules. Failure to correct the deficiencies within thirty (30) days could subject you to a formal enforcement action including monetary penalties. If you cannot submit this information within thirty (30) days, you must provide a schedule with dates when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the Department will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, F.S., or take other appropriate actions.

The response memo should be submitted within (7) seven days of receipt of this notice. If you have any questions, please contact Knox McKee at (407) 433-2650.

Sincerely,

  
J. Scott Benyon  
Deputy Assistant Secretary

JSB:km:rh/12

cc: James Scarbrough/EPA Region IV, Florida RCRA Activities, Atlanta  
Satish Kastury, DER/Tallahassee (w/attachment)  
Hazardous Waste Enforcement, DER/WPB

Resubmittal Format: Resubmittal of information requested in this NOD must be in the form of revised texts, figures, tables, etc. and/or additional appendices. This will allow for the old pages to be removed and the new pages to be added. All revised submittals must include the revision number and date.

A response memo from the facility, listing DER's NOD items followed by the facility's response should be submitted along with the replacement pages within (7) seven days of receipt of this notice.

GENERAL COMMENTS

1. It appears from the Engineers Certification that adequate containment volumes exist. The text should be revised to provide consistent numbers (i.e. II.C.7-2-1 expresses 2,679 gallon capacity, while Wishmeier & Associates present 3,626 gallon capacity [Return/Fill Area]).
2. Figure II.C.7-2, Page II.C.7-1B, shows excess capacity to be 19,240 gallons. Such a capacity would not be adequate containment capacity as per 40CFR, Part 264.175(b)(3). The tank displacement calculations should be revised to show a total tank displacement of 8,445 gallons (a total not inclusive of the displacement volume of one of the 15,000 gal tanks) and an excess capacity of 22,307 gallons. The revision will demonstrate the containment capacity to be in compliance.
3. Part I - General, Page 9 of 29, No. 4 of Form 17-730.900(2). Provide date that operation is expected to begin.
4. Part I - General, Page 10 of 29, B. Site Information, No. 1 Facility location. County is incorrect.
5. Part II, Page 28 of 29, No. 3. Explain the response, "Facility just completed construction and hazardous wastes have been stored onsite.", in more detail.
6. Attachment I.D.2, Description of Facility Operation, I.D.2-4. Explain the statement, "the storage tank/container storage area for spent antifreeze...". Is the spent antifreeze proposed to be stored in the "Drum Storage Area" (Figure II.B.1-1), the "Return/Fill Area", or the "Tank Farm"? The spent antifreeze should only be stored in the drum storage area.
7. Attachment II.A.2, Financial Responsibility Information, F1166-RV80, Phase III, No. 1. Fiscal projection should be made for soil analysis as per SW-846, photoionization detection is not adequate.
8. Attachment II.A.2, Financial Responsibility Information, F1166-RV81, 2.e. Confirm that sampling costs are sufficient for the laboratory analysis necessary to demonstrate clean closure.
9. Attachment II.A.2, Financial Responsibility Information, F1166-RV82, 3.e. Confirm that sampling costs are sufficient for the laboratory analysis necessary to demonstrate clean closure.
10. Provide verification that the concrete sealer is compatible with and resistant to all chemicals (see Attachment II.A.5, Waste Analysis Report) handled in the Drum Storage Area, Return/Fill Area and Tank Farm. Sub-Attachment II.B.1-1, Sikagard information, does not satisfactorily verify specific compatibility.
11. Page II. A.4(e)-10, No. 1 refers to measuring volumes of below ground tanks. Information on below ground tanks should be supplied or the reference deleted.
12. Wishmeier & Associates, April 9, 1991, letter to Mr. Rick Peoples states that, "the concrete slab has been coated with two coats of Sikagard 62, this material is resistant to physical contact with the waste liquids being stored..." Provide the documentation to support this claim.
13. Figure II.C.2-4(a) details both vertical and horizontal installation. The construction application presented vertical installation. Figure II.C.2-4(a) should be corrected to reflect the actual installation detail. The application must be specific, not generic.

14. Figure II.C.2-5(a) presents underground tank installation. There are no other references to underground storage tanks. Figure II.C.2-4(a) should be corrected to reflect the actual installation detail. The application must be specific, not generic.
15. Figure II.C.11-3 includes daily volume check for four (4) tanks when five (5) tanks are actually within the tank farm. Figure II.C.11-3 should be corrected to reflect the actual tank number. The application must be specific, not generic.
16. Figure II.C.11-3 has a provision for checking whether drums stored within "the dike" (secondary containment area) are open. Figure II.C.11-3 should be corrected to reflect that the containment area will be checked to insure that no drums will be stored within the containment area.
17. Page II.C.11-2 of Attachment II.C.11 says that tanks will be inspected once every five years. The section also states "Frequency and method of future inspection and testing will be determined based upon results of prior evaluations". The two statements, if not conflicting, lend to a degree of confusion. Elaborate on the tank testing schedule and how frequency is to be determined.