

(9.1)

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
FLD984167791  
ENFORCEMENT MEETING DOCUMENTATION

Attendees: (See attached list)

Location: SEFD Date: 1/14/92 Time: 9:30AM

Subject: PERMIT MODIFICATIONS - FRS WASTE

Meeting requested by: SAFETY - KLEEN CORP.

Meeting Objectives: TO DISCUSS PERMIT MODIFICATIONS  
INVOLVING FRS WASTES AT THE MIAMI AND BOYNTON  
FACILITIES ALONG THE MIAMI/MEDLEY CHANGE OVER

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Notes: PERMIT MODIFICATIONS ARE REQUIRED FOR BOTH BOYNTON BEACH AND MIAMI FACILITIES INCORPORATING THE HANDLING OF FRS WASTES. CONSENT ORDERS COMPLIMENTING THE PERMITS WILL BE NEEDED TO ALLOW FOR FRS HANDLING IN THE INTERIM.

1) BOYNTON BEACH - SOME CONCERNS/DEFICIENCIES HAVE BEEN NOTED WITH THE SUBMITTAL, C.O. WOULD ADDRESS 264 STORAGE REQUIREMENTS AND WOULD ALLOW FRS HANDLING DURING PERMIT APPROVAL.

2) MIAMI - AT THIS POINT, PERMIT WOULD BE DENIED BECAUSE OF REFERENCE TO STORAGE ON TRUCKS, RATHER THAN CONTAINER STORAGE AREA.

MIAMI - MEDLEY TRANSITION - S-K PRESENTED AN OUTLINE OF TIME FRAMES AND DATES ASSOCIATED WITH THE CLOSING AND STARTUP OF MIAMI AND MEDLEY (ATTACHED COPY)

DER TO SEND LETTERS REGARDING THE PERMIT MODIFICATIONS AT BOYNTON AND MIAMI.

DER TO DRAFT MODIFIED C.O.'S FOR BOTH FACILITIES

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Prepared by: Tim Gray  
(Signature)



**MIAMI TO MEDLEY TRANSITION**  
**Planned Sequence of Action Items and Time Deadlines**

**a. Jan. 15, 1992**

Dade County and the City of Medley are expected to issue building permits by this date. We cannot initiate physical construction until these are issued. *Not in scope*

**b. Jan. 18, 1992**

This is the 180th day prior to the July 15 expiration date. Remediation Section submits closure permit application.

**c. Feb. 1, 1992**

Victor is to submit a Major Permit Modification request on the Medley Part B construction permit by this date. Purpose of the request is to accomplish the listed items below.

- i. Allow Medley to operate under the construction permit. A current permit condition allows operation only after issuance of the operating permit, which is expected in very late 1992 or early 1993.

We prefer to handle this particular request separately, similar to our recent request to extend Medley's construction permit.

- ii. Include construction of a 20,000 gal waste antifreeze tank.
- iii. Include TCLP wastes.
- iv. Include FRS wastes as a permitted waste stream..
- v. Other minor changes. Removing references to container colors, including new dumpster/barrel washers.

An expeditious review and processing of this major modification is requested.

**d. Jan 15 to April 15, 1992**

Branch Construction builds the hazardous waste modules in the facility and completes construction of all facility features listed in items i. to v. below.

- i. All hazardous waste management areas; i.e., tank farm, return fill shelter, drum storage areas, high level alarms, and all other safety equipment proposed in the Part B. The side of the warehouse which houses the waste drums should be completed prior to the P.E. inspection.
- ii. All features described in the Contingency Plan; i.e., emergency/spill response equipment in all hazardous waste management areas, fire extinguishers, emergency eyewash, etc.
- iii. All stormwater control features; i.e., drainage systems, stormwater holding ponds, etc.
- iv. All security features; i.e., fences, gates, hazardous waste signs and all other signs specified in the permit.
- v. Any other features in the facility which the P.E. deems will ensure protection of S-K personnel and public health and welfare.

Consultant P.E. performs post-installation waste tank system integrity assessment inspection and completes report by this date. Assessment will be conducted before Certificate of Occupancy is issued.

Consultant P.E. performs site inspection. P.E. certifies completion of construction and checks to ensure everything on site is consistent with the Part B permit. Victor submits consultant's certifications to SE-FDER.

Submittal includes request for FDER inspection. Submittal also requests approval to start placing wastes in the drum and tank storage areas.

All of the above should be already complete prior to the P.E.'s site visit.

**e. April 15 to June 15, 1992**

Branch Construction completes construction of the remainder of the facility and then obtains Certificate of Occupancy.

SE-FDER performs inspection. Assuming no inconsistencies, SE-FDER issues letter allowing us to start placing wastes in the HW management units in Medley.

**f. June 15 to July 15, 1992**

Jorge Carvajal is notified of the letter in d. above and starts placing wastes in Medley. Jorge initiates transfer of waste operations from Miami to Medley.

Having to truck wastes to Boynton Beach is not expected if the above timelines are strictly met. If we cannot place wastes in Medley by July 15, S-K needs to transfer wastes (truck to truck transfer) somewhere. The receiving truck would then ship the wastes to Boynton Beach branch.

**g. July 15, 1992**

Last day of operation in Miami. There must be no picked-up hazardous wastes entering or left inside Miami's property beyond this date unless FDER changes its position.

**h. July 19, 1992**

Victor submits operating permit application for Medley. Medley construction permit expires December 1, 1992. Operating permit application must be submitted by above date as per permit condition.