safety-kleen.

Certified Mail - Return Receipt Requested

January 28, 1987
EJJ 87-122

Mr. Ashwin B. Patel
Hazardous Waste Supervisor
Florida Department of Environmental Regulation
3426 Bills Road
Jacksonville, Fl 32207

Subject: Orange Park Service Center (FLD 980847214)
Permit Application #HC10-128082

Dear Mr. Patel,

This has been prepared in response to your letter of December 29, 1986. Please note that pages 45 and 46 of the application were submitted to Mr. Brian Cobb with a letter dated October 7, 1986. A copy is attached for your reference. With reference to the remaining sections of the application:

I.E.3.e - Page IE 3-4a has been added to address the storage of paint wastes. In addition, Exhibit I.E 3-9 is a drawing of the paint waste shelter.

I.E.3.f - The precautions taken to prevent accidental ignition of wastes will be the same oas those taken with mineral spirits (see p. IE 4-8).

I.E.4 - Information concerning preparedness and prevention procedures have been incorporated into section I.E.4 of the permit application. Please refer to page I.E. 4-7.

I.E.5 - The training program will remain the same.

I.F.1 - The closure cost estimate (p I F 1-16) has been revised to include the paint waste shelter. The Financial Assurance Documentation will remain the same.

I.F.2 - Post-closure requirements do not apply to the paint waste shelter as all waste will be removed upon closure.

I.F.3 - The Certificate of Liability Insurance will not change.

II.B.1 - The storage shelter is described in section II and Exhibit II.B-1.

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60120 PHONE 312/697-8460 TELEX 910 251 4479

II.B.2 - A site plan has been submitted (Exhibit I.D. 5-1)

II.B.3 - This section is not applicable; incompatible wastes are not stored onsite.

II.B.4 - Specific procedures for inspections and management of leaking containers are presented in Section I.E.4.

II.B.5 - Please refer to section I.E.4 and Exhibit II.B.2.

II.B.6 - The closure plan has been revised to include the paint waste shelter (pp.IF 1-2, IF 1-3 and IF 1-13).

If you have any questions or require further information, please contact me on extension 2246.

Sincerely,

Ellen J. Jurczak, P.E.
Environmental Engineer/
Permits Manager

EJJ/dfs

cc: T. Becker, Tampa Reg. Mgr.
P. Johnson, Br. Mgr. (3-079-01)

October 7, 1986
EJJ 86-347

Mr. Brian Cobb
Florida Department of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

Subject: Orange Park Service Center
Permit Application H010-119940
FLD980847214

Dear Mr. Cobb:

Please find attached the certification statement for the subject permit application. It has been signed by a Safety-Kleen corporate officer, the owner and a professional engineer registered in Florida.

If you have any questions, please call me.

Sincerely,

Ellen J. Jurczak
Environmental Engineer/
Permits Manager

EJJ/dfs

Attachment

cc: T. Becker, Tampa Reg. Mgr.
P. Johnson, Br. Mgr. (3-097-01)

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60120 PHONE 312/697-8460 TELEX 910 251 4479

CERTIFICATION

1. OPERATOR

THIS IS TO CERTIFY THAT UNDER PENALTY OF LAW I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. FURTHER, I AGREE TO COMPLY WITH THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES, AND ALL RULES AND REGULATIONS OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION. IT IS UNDERSTOOD THAT THE PERMIT IS ONLY TRANSFERABLE IN ACCORDANCE WITH SECTION 17-30.30, FAC, AND, IF GRANTED A PERMIT, THE DEPARTMENT OF ENVIRONMENTAL REGULATION WILL BE NOTIFIED PRIOR TO THE SALE OR LEGAL TRANSFER OF THE PERMITTED FACILITY.

David A Dattilo

SIGNATURE OF THE OPERATOR OR AUTHORIZED REPRESENTATIVE*

David A. Dattilo, Vice President, Sales and Service
NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 10/7/86 TELEPHONE NO. (312) 6978460

*ATTACH A LETTER OF AUTHORIZATION

2. FACILITY OWNER

THIS IS TO CERTIFY THAT I UNDERSTAND THIS APPLICATION IS SUBMITTED FOR THE PURPOSE OF OBTAINING A PERMIT TO CONSTRUCT, OPERATE, OR CLOSE A HAZARDOUS WASTE MANAGEMENT FACILITY ON THE PROPERTY AS DESCRIBED. AS OWNER OF THE FACILITY, I UNDERSTAND FULLY THAT THE FACILITY OPERATOR AND I ARE JOINTLY RESPONSIBLE FOR COMPLIANCE WITH THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES, AND ALL RULES AND REGULATIONS OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION.

Gordon Burnam Bonnie Burnam

SIGNATURE OF THE FACILITY OWNER OR AUTHORIZED REPRESENTATIVE*

Gordon Burnam and Bonnie Burnam, Owners
NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 10/3/86 TELEPHONE NO. (314) 449-0091

*ATTACH A LETTER OF AUTHORIZATION

3. LAND OWNER

THIS IS TO CERTIFY THAT I, AS LAND OWNER, UNDERSTAND THAT THIS APPLICATION IS SUBMITTED FOR THE PURPOSE OF OBTAINING A PERMIT TO CONSTRUCT, OPERATE, OR CLOSE A HAZARDOUS WASTE MANAGEMENT FACILITY ON THE PROPERTY AS DESCRIBED. FOR HAZARDOUS WASTE DISPOSAL FACILITIES, I FURTHER UNDERSTAND THAT I AM RESPONSIBLE FOR PROVIDING THE NOTICE IN THE DEED TO THE PROPERTY REQUIRED BY 40 CFR §264.120 AND §265.120, AS ADOPTED BY REFERENCE IN CHAPTER 17-30, FAC.

Gordon Burnam Bonnie Burnam

SIGNATURE OF THE LAND OWNER OR AUTHORIZED REPRESENTATIVE*

Gordon Burnam and Bonnie Burnam, Owners

NAME AND TITLE (PLEASE TYPE OR PRINT)

DATE: 10/3/86 TELEPHONE NO. (314) 449-0091

*ATTACH A LETTER OF AUTHORIZATION

4. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (WHERE REQUIRED BY CHAPTER 471, F.S.)

THIS IS TO CERTIFY THAT THE ENGINEERING FEATURES OF THIS HAZARDOUS WASTE MANAGEMENT FACILITY HAVE BEEN ~~DESIGNED~~/EXAMINED BY ME AND FOUND TO CONFORM TO ENGINEERING PRINCIPLES APPLICABLE TO SUCH FACILITIES. IN MY PROFESSIONAL JUDGMENT, THIS FACILITY, WHEN PROPERLY CONSTRUCTED, MAINTAINED AND OPERATED, OR CLOSED, WILL COMPLY WITH ALL APPLICABLE STATUTES OF THE STATE OF FLORIDA AND RULES OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION.

SIGNATURE Phil Parker

NAME Phil Parker (PLEASE TYPE)

MAILING ADDRESS Parker Mechanical Inc.

P.O. Box 95263
STREET OR P.O. BOX

Madeira Beach, Florida 33708
CITY STATE ZIP

(813) 360-5136 August 7, 1986
TELEPHONE NO. DATE

FLORIDA REGISTRATION NUMBER: P.E. 020781

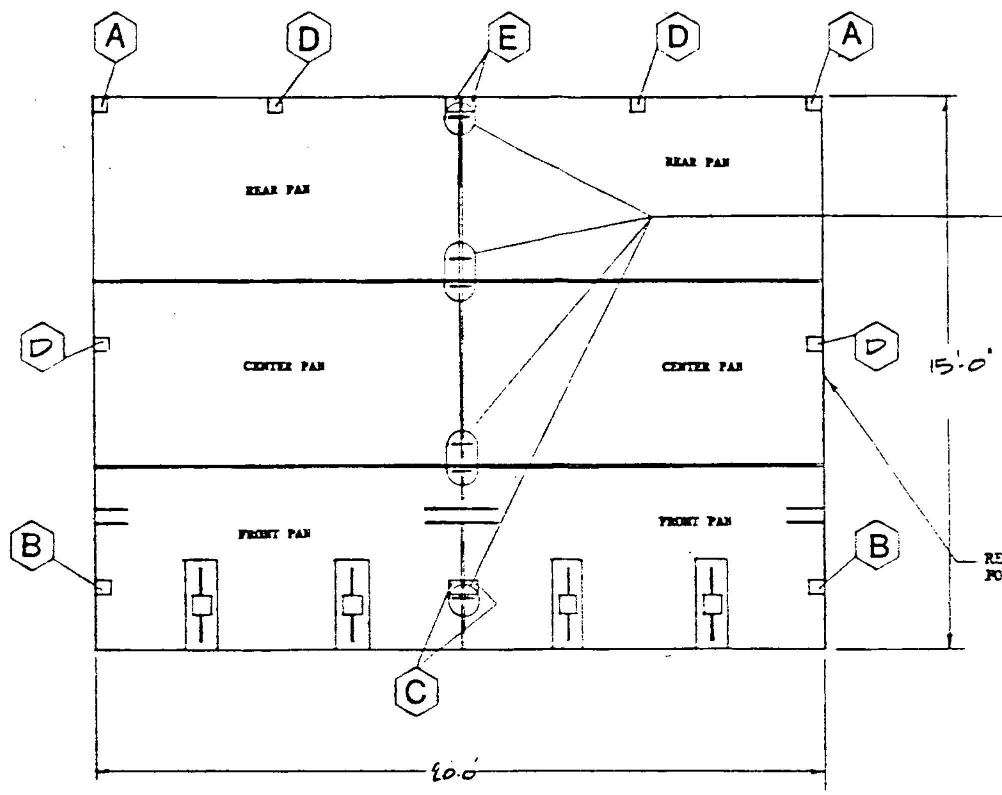
(Please Affix Seal)

ORANGE PARK, FL.

I.E.3.d PAINT WASTES

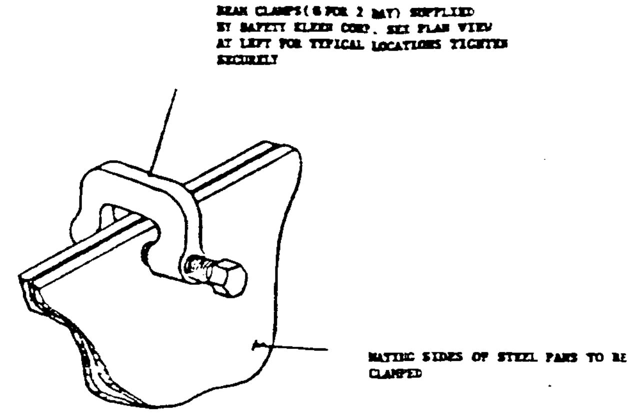
Paint wastes will be placed in five gallon metal pails and sixteen gallon drums at the customer's place of business. The containers are palletized and stored in the enclosed metal shelter shown in Exhibit I.E.3-9. This structure has secondary containment in the form of a 120' x 15' x 0.5' (1,122 gallons) metal pan at its base; no more than 1,100 gallons will be stored at any given time.

The paint waste shelter and its secondary containment are constructed of sheet steel and it is painted light colors (white and beige) to reflect sunlight. An overhead door secures the shelter when drums are not being added to or removed from it.



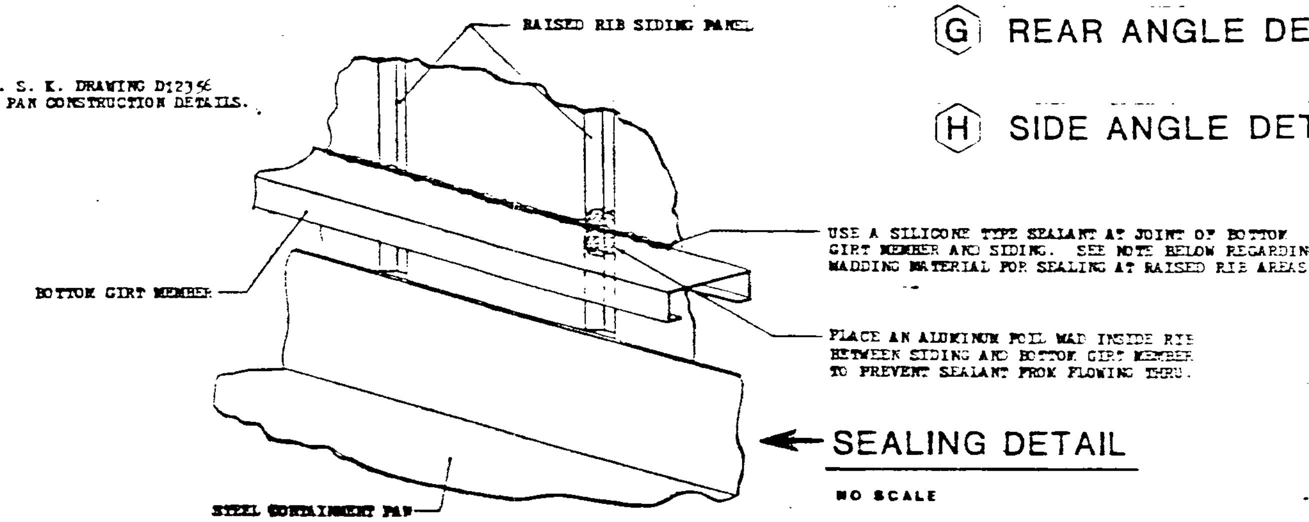
PLAN VIEW / PAN ARRANGEMENT

SCALE: 3/8"=1'0"



CLAMP DETAIL

NO SCALE



SEALING DETAIL

NO SCALE

(A) REAR CORNER POST

(B) FRONT POST

(C) FRONT CENTER POST

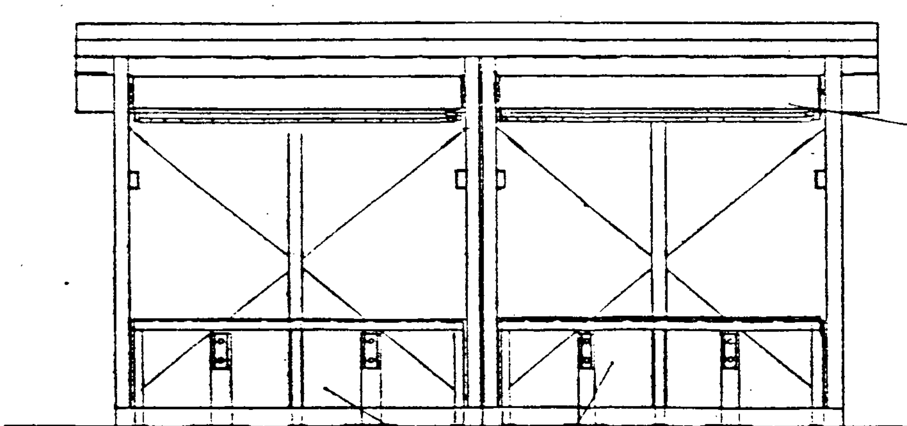
(D) CENTER POST

(E) REAR INTERMEDIATE POST

(F) END CHANNEL DETAIL

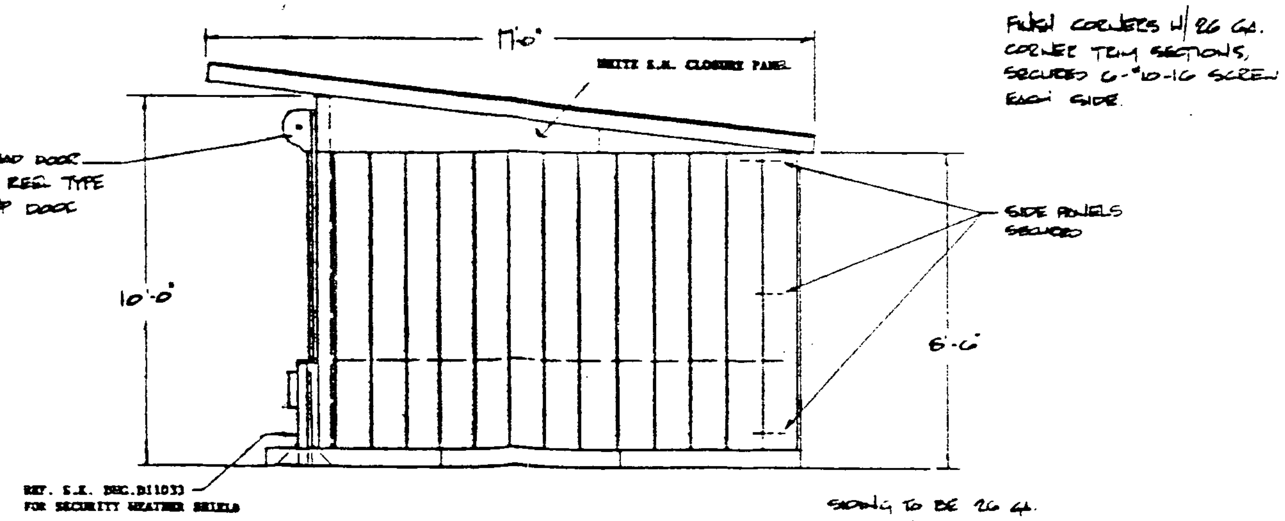
(G) REAR ANGLE DETAIL

(H) SIDE ANGLE DETAIL



FRONT VIEW

SCALE: 3/8"=1'0"



SIDE ELEVATION

SCALE: 3/8"=1'0"

FINISH CORNERS W/ 26 GA. CORNER TRIM SECTIONS, SECURED 6-#10-16 SCREW EACH SIDE.

SIDING TO BE 26 GA. CORRUGATED PANELS SECURED W/ 8-#10-16 SCREWS AT EACH FLAT BETWEEN RIBS 3/4" HIGH RIBS 12" O.C.

EXHIBIT I.E.3-9
Paint Waste Shelter

safety-kleen corp.

STORAGE SHELTER - CLASS IB

SCALE	AS NOTED
DATE	8/15/86
DR. BY	EMF
TITLE	FOR SERVICE CENTER BRANCH.
DWG. NO.	D12351

In the drum storage area, drums are handled with a hand-truck free of sharp points and stacked by hand. Every time a drum is moved, a slight chance exists that it could possibly be tipped over, dropped or punctured. To minimize the possibility of the spillage of under those conditions, the drums are tightly covered and kept in an upright position. A small portable electric pump is available to quickly transfer the liquid from any leaking container into another safe drum. Each route truck is equipped with an electric hoist. This hoist is used in the loading/unloading operation to minimize chances for spillage and/or employee injury. The trucks shipping containers between the Recycle Center and Service Center have lift gates for drum loading/unloading.

All drums are covered during movement and are located within diked, concrete floored areas to contain any potential spill. The small quantities of waste on-site at any time can be cleaned up immediately through the use of hand-held electric pumps, mops, wet/dry vacuums, or sorbent materials should a spill occur. Any spilled waste will be drummed and sent for recycling/reclamation.

All drummed waste movement is done manually or by a pallet jack and power outages are not expected to threaten employee safety.

The overhead door to the paint waste shelter will be closed and locked unless containers are being added to or removed from the shelter. Warning signs are also posted on the shelter.

Employee training emphasizes the importance of inspection, maintenance, personal safety, and reporting of conditions with pollution incident potential. This training, containment system and immediate clean-up of any spills will eliminate chance of

I.F.1.e CLOSURE COST ESTIMATES

1. Tank Closure - Open, remove contents of, and clean, remove, and dispose of, a 15,000-gallon 10'6" diameter x 23'3" high aboveground storage tank.

Access to Tank $ 350

Remove Material: The costs involved in off-site transportation and reclamation are adequately compensated by the economical value of the used solvent. Assume no net cost gain or loss.

Squeegie Clean Tank and Testing of wash water	$ 800
Dispose of wash water: 1,500 gal. at $0.50/gal.	$ 750
Disconnect and cap all appurtenant piping and equipment 2 man-days at $30/hr.	$ 480
Torch cut the tank 16 hours at $40/hr.	$ 640
Remove tank	$ 350
Total Closure Cost for the 15,000-Gallon tank	$3,370

2. CLOSURE OF DRUM STORAGE AREAS - Remove and return drums to the Recycle Center, clean the drum storage areas, and dispose of wash water generated.

a. Remove and return drums to the Recycle Center, 380 miles at $1.75/mile	$ 665**
b. Clean the storage area - ten man-hours at $30.00/hour	$ 300
c. Dispose of the wash water - 50 gallons at $.50/gallon	$ 25
Total Closure Cost	$ 990

3. CLOSURE OF DUMPSTER AND RETURN/FILL SHELTER AREA - Remove, package and dispose of sludge, clean the dumpster and return/fill shelter area, remove dumpster and shelter structure for reuse.

a. Remove, package and dispose of sludge - 150 gallons at $.75/gallon	$ 113
b. Clean dumpster and shelter area - 16 man-hours at $30.00/hour	$ 480
c. Remove dumpster and shelter - 16 man-hours at $40.00/hour	$ 640
Torch eight hours at $30.00/hour	$ 320
Total Closure Cost	$1,553

** Assumed the value of the used immersion cleaner and the drums offsets the cost of treatment by Safety-Kleen facility.

4. CLOSURE OF PAINT WASTE SHELTER AREA
Clean the paint waste shelter area, remove shelter structure for reuse.

a. Clean dumpster and shelter area - 16 man-hours at $30.00/hour	$ 480
b. Remove dumpster and shelter - 16 man-hours at $40.00/hour	$ 640
Torch eight hours at $30.00/hour	$ 320
Total Closure Cost	$1,440

5. CERTIFICATION OF CLOSURE $1,000

6. TOTAL CLOSURE COSTS

Aboveground Tanks:	$3,370
Drum Storage Area:	990
Solvent Return/Fill:	1,553
Paint Waste Area:	1,440
Certification:	1,000
Total	$8,353

PART II - CONTAINERS

II.B.1 CONTAINMENT

The immersion cleaner is always contained in partially filled, 16-gallon, covered drums before, during, and after its use. Except after returning the drums to the Recycle Center, the immersion cleaner is never transferred to another container. The drums containing the used immersion cleaner are returned to the Service Center and stored in a designated drum storage area before shipment to the Recycle Center.

The dry cleaning wastes are contained in 15, 16 and 30 gallon drums. The drums are managed similar to the used immersion cleaner drums, and contents within the drums will not be removed or processed at the Service Center.

The drum storage area as shown on Exhibit I.D.5-2 occupies a portion of a building area which has a concrete floor, berms, and two interceptor trenches to form a spill containment system. The system is free of cracks and gaps. Spills are removed by a hand-held, portable electric pump (the COMS pump), wet-dry vacuum cleaner, or sorbent materials. The capacities of the containment systems are designed to be greater than 10% of the total liquid storage capacity in the drum storage area. Since the characteristics of the stored wastes are generally known, no analysis are performed for the materials collected from the containment area. All collected materials are sent to a recycling center for

recycling/reclamation. The recovered materials that can not be effectively reclaimed at the recycle center will be, in turn, sent to a licensed facility for disposal.

Paint wastes will be placed in five gallon metal pails and sixteen gallon drums at the customer's place of business. The containers are palletized and stored in the enclosed metal shelter shown in Exhibit II.B-1. This structure has secondary containment in the form of a 20' x 15' x 0.5' (1122 gallons) metal pan at its base; no more than 1100 gallons will be stored at any given time.

All drums are transported, moved, and stored carefully in an upright position. The route trucks are equipped with an electric hoist to assist loading/unloading. In the warehouse area, the immersion cleaner, mineral spirits dumpster mud drums, and dry cleaning waste drums are moved with 2-wheel hand trucks and stacked by hand. All drums will be elevated on pallets to eliminate the possibility of drums standing in spilled solvent.

The drums are designed and constructed to be compatible with the stored material and to minimize the possibility of breakage and leaking, in accordance with DOT Shipping Container Specification Number 5B. Exhibits I.E.3-1 to I.E.3-2 show typical detailed construction specifications of the 16-gallon immersion cleaner drums. Similar specifications are also utilized for the 15 and 30-gallon drums. Specifications for paint waste containers are listed in Exhibit II.B-2.

The drum storage area for immersion cleaner, mineral spirits dumpster mud, and dry cleaning waste (Exhibit I.D.5-2) has capacity for handling 144 16-gallon immersion cleaner drums, representing a potential maximum of 864 gallons of fresh chlorinated solvent storage or 720 gallons of used chlorinated solvent storage, or a combination of 144 drums of both fresh and used solvent drums; and 18 16-gallon drums (144 gallons) of mineral spirits dumpster mud.

There is also capacity for 20 30-gallon, and 54 16-gallon drums of dry cleaning waste, representing a potential for 292 gallons of waste. The immersion cleaner drums are stacked in two layers (total 54 inches in height), and the dry cleaning drums are usually stacked in one layer in the configuration as shown on Exhibit I.D.5-2. Total spill containment of the drum storage area has a 400-gallon capacity, greater than 10% of total liquid storage in the area, which is 1,156 gallons.

Exhibit I.D.5-2 shows the configuration and stacking arrangement. The placement of 15-gallon and 30-gallon "Perc" drums are interchangeable, as each 30-gallon drum location can have 2 15-gallon drums, double stacked, or vice versa.

At present, all wastes are stored in steel drums; however, a polyethylene drum is planned for use in the near future. Also, a plastic lined fiber container may be used for dry cleaning cartridges. Since none of the waste handled by Safety-Kleen react with metal or polyethylene, compatibility is assured. Immersion cleaner and dry cleaning waste drums are never opened at the branch. None of the wastes are incompatible; however, solvents are segregated for quality assurance purposes. Only mineral spirits is placed in red drums, only immersion cleaner in gray and only perchloroethylene in blue.

The drum storage area in the warehouse has a containment system which consists of 4" x 6" concrete curbing and a sump which prevent both run-on and run-off.

II.B.2. WASTE COMPATIBILITY

The used immersion cleaner and the dry cleaning wastes are not incompatible with each other, or with other materials handled at this facility, insofar as reactivity is concerned. However, they are the primary source of feed stock for regenerating the clean solvents. Separation of these used solvent and dry cleaning wastes is a standard practice at the Service Center.

All material at the Service Centers is managed in accordance with local fire protection code and fire department recommendation.

Drum storage configurations are shown of Exhibit I.D.5-2.

The paint waste shelter does not meet the 50-foot buffer zone requirement for ignitable wastes; however, Safety-Kleen believes this storage to be as safe as one which meets the requirement. Ignitable wastes are stored in small volumes (a maximum of 16 gallons/drum) and no more than 104 containers are stored at any one time. These drums are never opened while in storage. They are stored within a well-ventilated room and no smoking or other sources of ignition are allowed in the room. In addition, the nearest offsite building is 50 feet from the paint waste shelter; a parking lot lies between Safety-Kleen and neighboring buildings. The placement of the paint waste shelter has been approved by the fire commissioner.

II.B.3 INCOMPATIBLE WASTES

See above Section II.B.2.

II.B.4 PROCEDURES FOR LEAKING CONTAINERS

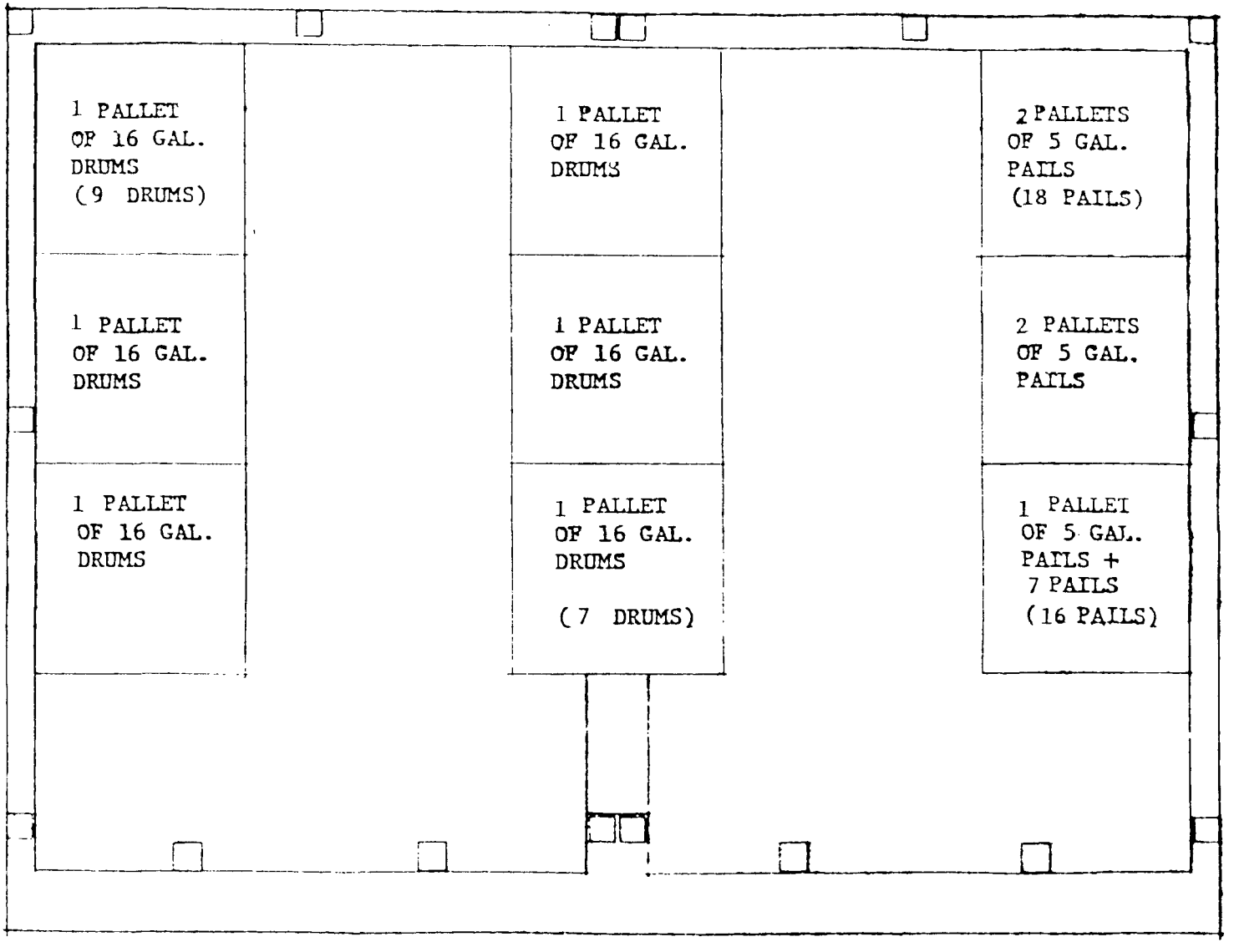
Specific procedures for inspection and management of leaking containers are presented in Section I.E.4.

II.B.5 INSPECTION PROCEDURES

See Section I.E.4.

II.B.6 CLOSURE PLAN

A closure plan for the entire facility is presented in Section I.F.



PAINT WASTE STORAGE
3/8" = 1'

5 pallets x 9 drums/pallet x 16 gal./dr.
+ 7 drums x 16 gal./dr. +
5 pallets x 9 pails/pallet x 5 gal./pail
+ 7 pails x 5 gal./pail
= 1,092 gallons total

EXHIBIT II.B-1

EXHIBIT II.B-2

PAINT WASTE CONTAINER

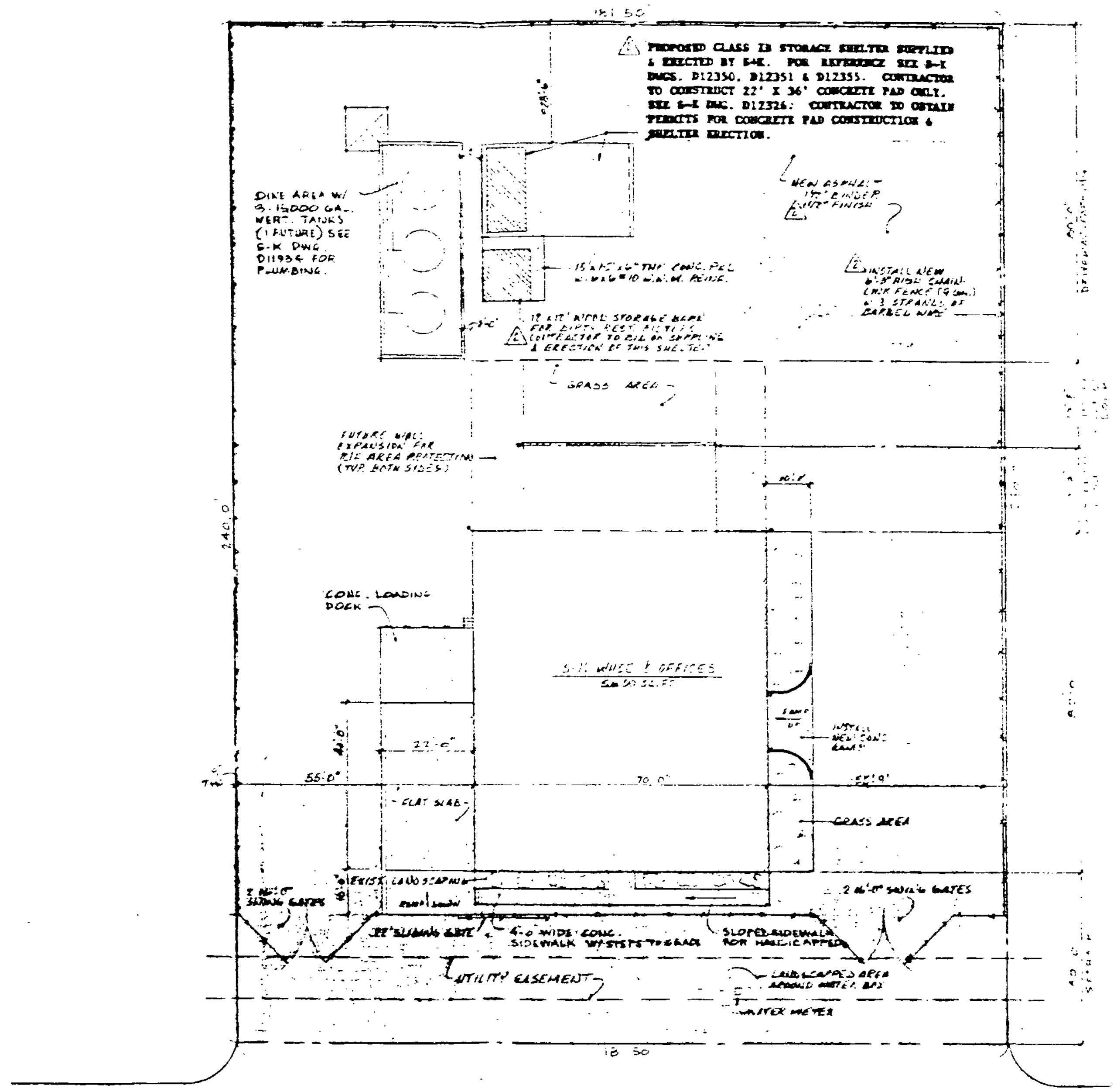
SPECIFICATIONS

The empty 5 gallon pail is ordered under Safety-Kleen part number 9986, per the following specification:

> 5 gallon, 24 gage steel tighthead pail, black exterior, rust inhibited interior, DOT17E, with handle and 2" flange and plug.
>
> 11" outer diameter x 13-19/32" high

The current empty 16 gallon drum is ordered under Safety-Kleen part number 3362, per the following specification:

> 16 gallon, 20 gage steel closed head drum, with 2" bung and 3/4" bung, per DOT17E
>
> 14-7/8" outer diameter x 26-7/8" high



SITE PLAN

SCALE: 1" = 20'-0"

GENERAL NOTES

1. SEWER, ELECTRIC, & WATER ENTRANCES TO BE APTLY & PRACTICALLY LOCATED PER LOCAL SITE.
2. ALL STORM WATER TO BE HANDLED BY USE OF SWALES & GRADUATED GRADES TO DIRECT WATER AWAY FROM IMPROVEMENTS SO AS NOT TO DISTURB THE NATURAL FLOW OF WATER.
3. LOADING RAMP PITS (IF USED) TO BE EQUIPPED WITH CATCH BASIN DRAINS AND/OR SUMP PUMPS.
4. WAREHOUSE & OFFICE MAY BE SINGLE OR DUAL LEVEL PER LOCAL SITE CONDITIONS.
5. DRIVE SURFACE TO BE ROCKED ONLY TO SUFFICIENT DEPTH & DENSITY TO HANDLE HEAVY TRUCK TRAFFIC AS DETERMINED BY LOCAL SOIL CONDITIONS.

EXHIBIT I.D.5-1
Site Plan

1

safety-kleen corp.

SITE PLAN

SCALE 1" = 20'-0"			
DATE 8/25/86	ADDED CLASS IB SHELTER		
C.S.			

FOR SERVICE CENTER BRANCH

D11745

An anticipated closure schedule can be seen in Exhibit H-1. An anticipated maximum waste inventory for the facility is presented in the following section.

I.F.1.b FACILITY DATA

1. Waste Management Facility Descriptions

a. Aboveground Storage Tank

A 15,000-gallon steel tank, 10'6" diameter x 23'3" high, for used Mineral Spirits storage.

b. Drum Storage Area, one 24'x 24' area with 6" wide by 4" high continuous curbing with collector sumps. It has capacity for 144 16-gallon, immersion cleaner drums; and 18 16-gallon Mineral Spirits dumpster mud drums; 54 16-gallon and 20 30-gallon dry cleaning waste drums (Perc), or a variation of specific drum contents within the total drum count.

c. Solvent Return/Fill Shelter, one 15' x 20', with two solvent return receptacles (wet dumpster) and associated appurtenances.

d. Paint Waste Shelter, one 10' x 20' located as shown in the site plan.

2. Maximum Inventory of Wastes

a. Used Mineral Spirits: 90% x 15,000 gallons = 13,500 gallons

b. Used Immersion Cleaner: 144 drums x 5 gallons/drum = 720 gallons

c. Mineral Spirits Dumpster Mud:

(1) 18 drums x 8 gallons/drum = 144 gallons

(2) In Dumpsters: 3' x 5' x 1.5' x 7.48 gallons/cu. ft. x 2 = 337 gallons

d. Dry Cleaning Waste:

54 drums x 16 gallons/drum x 20% free liquid = 173 gallons; and

20 drums x 30 gallons/drum x 20% free liquid = 120 gallons

e. Paint Waste:

5 and 16 gallon drums with total capacity of 1,100 gallons

I.F.1.c CLOSURE PROCEDURE

1. Drum Storage Areas

a. The drum storage areas contain drums of used immersion cleaner, Mineral Spirits dumpster mud, and dry cleaning wastes.

b. At closure all the drums will be removed and transported to the Recycle Center with proper packaging, labeling and manifesting, where the contents in the drums will be reclaimed and the drums will be cleaned for reuse.

c. The concrete floor and spill containment areas will be cleaned with detergent solution and tested for effectiveness of decontamination.

d. The wash water and all other wastes generated in the closure

(2) Add additional backfill with proper compaction if necessary. The material must be of clean materials and easily compacted in place.

(3) Regrade the site to proper topography.

(4) Remove and dispose of non-useable debris.

4. Paint Waste Shelter

The paint waste shelter is used to store containers of paint waste prior to shipment to a reclaimer. At closure, any residual waste will be removed from the shelter and shipped to a reclaimer. The shelter will be thoroughly cleaned with a detergent solution and the rinsate will be collected and properly disposed of. The metal structure will be reused by Safety-Kleen or scrapped.

I.F.1.d FACILITY CLOSURE SCHEDULE AND CERTIFICATION

1. Safety-Kleen may amend the closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.). Safety-Kleen shall amend the plan any time changes in operating plans or facility design affect the closure plan or whenever there is a change in the expected year of closure of the facility. The plan must be amended within 60 days of the changes.