

Certified Mail - Return Receipt Requested

March 25, 1987
EJJ 87-166

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

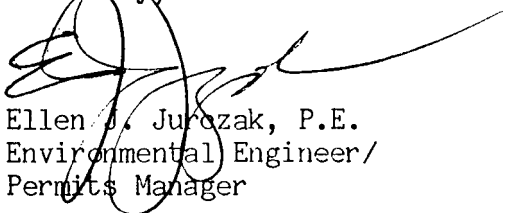
Subject: Orange Park Service Center (FLD 980847214)
Permit Application #HC10-128082

Dear Mr. Patel,

This has been prepared in response to your letter of March 10, 1987. Included are responses to your comments, revised text pages and exhibits.

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

Sincerely,



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

EJJ/dfs

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

SAFETY-KLEEN CORP.
ORANGE PARK, FLORIDA SERVICE CENTER
RESPONSES TO COMMENTS DATED MARCH 10, 1987

Comment 1:

Exhibit I.E.3-9 does not show that the sealant used to fill the gaps and cracks in the bottom pan and in the rest of the metal shelter will not react with the hazardous waste stored in it. Provide this information. [40 CFR 264.175(b)]

Response:

Paint wastes are incompatible with strong, oxidizing agents (see the Material Safety Data Sheet). None are present in any of the components of the storage shelter.

Comment 2:

The design drawings neither describe the slope of the bottom of the shelter nor do they describe whether all spillage in the shelter will drain to the pan. This information is very important and must be submitted in detail. [40 CFR 264.175(c)]

Response:

The bottom of the shelter is flat, as depicted in drawing number D12351. The drums are placed on a steel grating (please refer to drawing number D12350) so that any spills will drain to the pan. You should note that the pan has no outlet and can contain the entire volume stored (see drawing number D12356).

Comment 3:

Provide design drawings for the secondary containment system. Also show how accumulated liquids in the containment system will be analyzed and removed in as timely a manner as is necessary to prevent overflow. Describe and list the equipment to be used for removal of collected liquids. [40 CFR 264.175(b)(5)]

Response:

Additional drawings of the paint waste shelter are enclosed. These show the structure of the secondary containment system. All accumulated liquids will be removed as described in Part I.E.2 of the permit application.

Comment 4:

Provide information showing how the run-on into the containment system will be controlled. Also show how the run-off from the metal shelter will be controlled. [40 CFR 264.175(b)(4)]

Response:

There will be no run-on or run-off to or from this structure. The secondary containment pan has no inlet or outlet and can contain the total volume stored.

Comment 5:

Show how and what temperature will be maintained in the shelter to prevent ignition, fire or explosion. This information must be based on the hottest possible day of the year. Consider that on the hottest day, the open air temperature is approximately 100° to 105°F and the air temperature inside the shelter may reach 130° to 150°F because of the radiant heat effect in a closed metal shelter.

Response:

The structure has been painted light colors (white and beige) to reflect sunlight and is well-ventilated so that ignitable vapors do not accumulate. In addition, all sources of ignition are kept away from the shelter as described on page I.E.2-13.

Comment 6:

Provide engineering evaluation for the structural integrity of the base, considering the maximum drums stored at any one time. [40 CFR 264.175(b)(1)]

Response:

The base is 4,000 psi rated steel-reinforced concrete (see drawing number D12326). The maximum amount stored would be 7,700 pounds plus the weight of containers (about 2,000 pounds total), the pallets (about 240 pounds total) and the weight of the shelter (about 11,000 pounds). This total weight of the shelter, distributed over 300 square feet (43,200 square inches) is exceeded by the strength of the base.

Comment 7:

Provide the design drawings showing adequate aisle space in the metal shelter. [40 CFR 264.173]

Response:

A design for the layout of drum storage is enclosed. Four foot aisles will be maintained.

Comment 8:

Your submittal dated January 28, 1987 references Page I.E.4-8, which is not included. Please provide this page with your next submittal.

Response:

Page I.E.4-8 is enclosed.

Comment 9:

Provide an inspection schedule describing how often monitoring, emergency, safety, operating and structural equipment, and security devices will be inspected. Also include how often the facility and containers will be inspected to check for leaks or cracks. An inspection log or summary including the following must be maintained at the facility:

- (1) Dates and times of inspections
- (2) Name(s) of inspector(s).
- (3) Observation made.
- (4) Date and nature of repairs or remedial actions. [40 CFR 264.15, 264.174]

Response:

The Facility Inspection Record (copy enclosed) will be used to inspect the paint waste shelter. Items 8 thorough ll apply to this structure.

Comment 10:

Provide a list of equipment to be kept in this metal shelter for safety and remedial actions. [40 CFR 264.32]

Response:

A fire extinguisher will be kept at the metal shelter, all other safety equipment will be stored in the service center warehouse as described in Exhibit I.E.4-2.

Comment 11:

Page II-5 of the last submittal dated January 28, 1987, states that the shelter does not meet the 50 foot buffer zone requirement for ignitable waste. Provide documentation of any variance or approval is received from the fire marshall or fire commissioner.

Response:

This documentation has been requested of the fire marshall and will be forwarded to your office upon receipt.

Comment 12:

The last sentence on Page I.E.4-7a of your last submittal is incomplete. Please provide a new page after correction.

Response:

The last sentence on page 4-7a is completed on page 4-8.

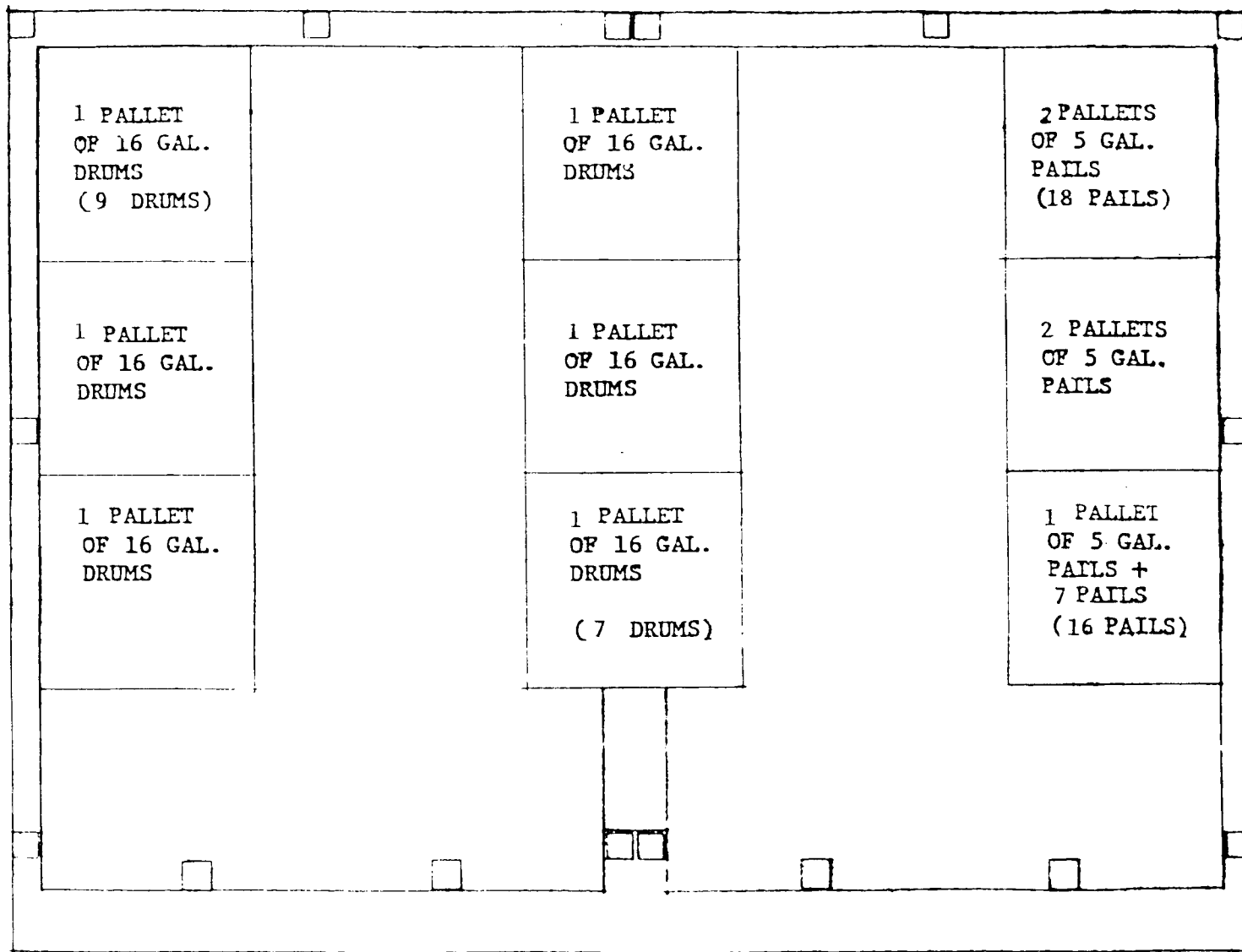
Comment 13:

During inspection of this facility last month, our staff found that there was no "Hazardous Waste" sign on the tank and that there were no "Danger - Unauthorized Personnel Keep Out" signs on the east and back of the fence. These signs must be posted immediately and maintained as long as the facility operated.

They also found that the front gate was open and there were no security personnel at the gate. 40 CFR 264.14 required facilities to control entry of persons or livestock onto the active portion of the facility. Please provide information describing what corrective measures are taken and how compliance with this regulation will be maintained.

Response:

A "Hazardous Waste" sign and "Danger - Unauthorized Personnel Keep Out" signs have been placed at the appropriate locations. The service center manager has been instructed that the entrance gates must be closed and locked when the facility is unoccupied.



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

MATERIAL SAFETY DATA SHEET
SAFETY-KLEEN CORP.
 777 Big Timber Rd.
 Elgin, IL 60120



IDENTITY (As Used on Label and List)
 Safety-Kleen Lacquer Thinner

Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.

Section I Part #6782

Manufacturer's Name

Safety-Kleen Corp.

Emergency Telephone Number

312/697-8460

Address (Number, Street, City, State, and ZIP Code)

777 Big Timber Road

Telephone Number for Information

312/697-8460

Elgin, Illinois 60120

Date Prepared

12/13/85

Signature of Preparer (optional)

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity, Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (optional)
Toluene	200 ppm	100 ppm	-	-
Xylene	100 ppm	100 ppm	-	-
Methyl Ethyl Ketone	200 ppm	200 ppm	-	-
Methyl Iso Butyl Ketone	100 ppm	50 ppm	-	-
Acetone	1000 ppm	750 ppm	-	-
Isopropanol	400 ppm	400 ppm	-	-
Methanol	200 ppm	200 ppm	-	-
Ethanol	1000 ppm	1000 ppm	-	-
Normal Butyl Acetate	150 ppm	150 ppm	-	-
Iso Butyl Acetate	200 ppm	200 ppm	-	-

Section III — Physical/Chemical Characteristics

Boiling Point	131-347°F.	Specific Gravity (H₂O = 1)	~0.840
Vapor Pressure (mm Hg.)	@ 68°F. 185	Melting Point	N/A
Vapor Density (AIR = 1)	2.0	Evaporation Rate (Ether = 1)	slower than ether

Solubility in Water
 Appreciable.

Appearance and Odor

Clear colorless liquid with characteristic solvent odor.

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used) <20°F. TCC	Flammable Limits	LEL 1.1	UEL 12.8
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Extinguishing Media

CO₂, foam, dry chemical, water (mist only)

Special Fire Fighting Procedures

Liquid water may be used to cool containers and firefighters. However, due to differences in specific gravity, water could cause the free solvent to spread and a fire to spread.

Unusual Fire and Explosion Hazards

Extremely flammable.

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	Heat, sparks, flame and fire.

Incompatibility (Materials to Avoid)**Strong oxidizing agents.****Hazardous Decomposition or Byproducts**

Normally none; however, incomplete burning may yield carbon monoxide.

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

Section VI — Health Hazard Data

Routes of Entry:	Inhalation? yes	Skin? yes	Ingestion? yes
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Health Hazards (Acute and Chronic)

Skin - Can cause drying of skin. Eyes - Severe irritant. Inhalation - Excessive inhalation can cause headache, dizziness and nausea. Ingestion - Harmful or fatal if swallowed.

Carcinogenicity:	NTP? no	IARC Monographs? no	OSHA Regulated? no
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None of the ingredients are known or suspected carcinogens.

Signs and Symptoms of Exposure

Drying of skin, eye irritation, headache, dizziness, and nausea.

Medical Conditions seriously Aggravated by Exposure	Unknown.
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Emergency and First Aid Procedures
Skin - Wash with soap and water. Eyes - Irrigate with water. Inhalation - Remove to fresh air source and call a physician. Ingestion - DO NOT INDUCE VOMITING. Call a physician.

Section VII — Precautions for Safe Handling and Use**Steps to Be Taken in Case Material is Released or Spilled**

Catch and collect for recovery as soon as possible. Avoid exposure to sparks, fire, flame, hot surfaces.

Waste Disposal Method	Dispose of in accordance with company, local, state and federal regulations.
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Precautions to Be Taken in Handling and Storing
Extremely flammable. Keep away from heat, sparks, flame. Use with adequate ventilation. Avoid long and repeated contact with skin. If clothes are inadvertently saturated with solvent - DO NOT SMOKE - Keep away from ignition sources. Keep out of reach of children.

Section VIII — Control Measures

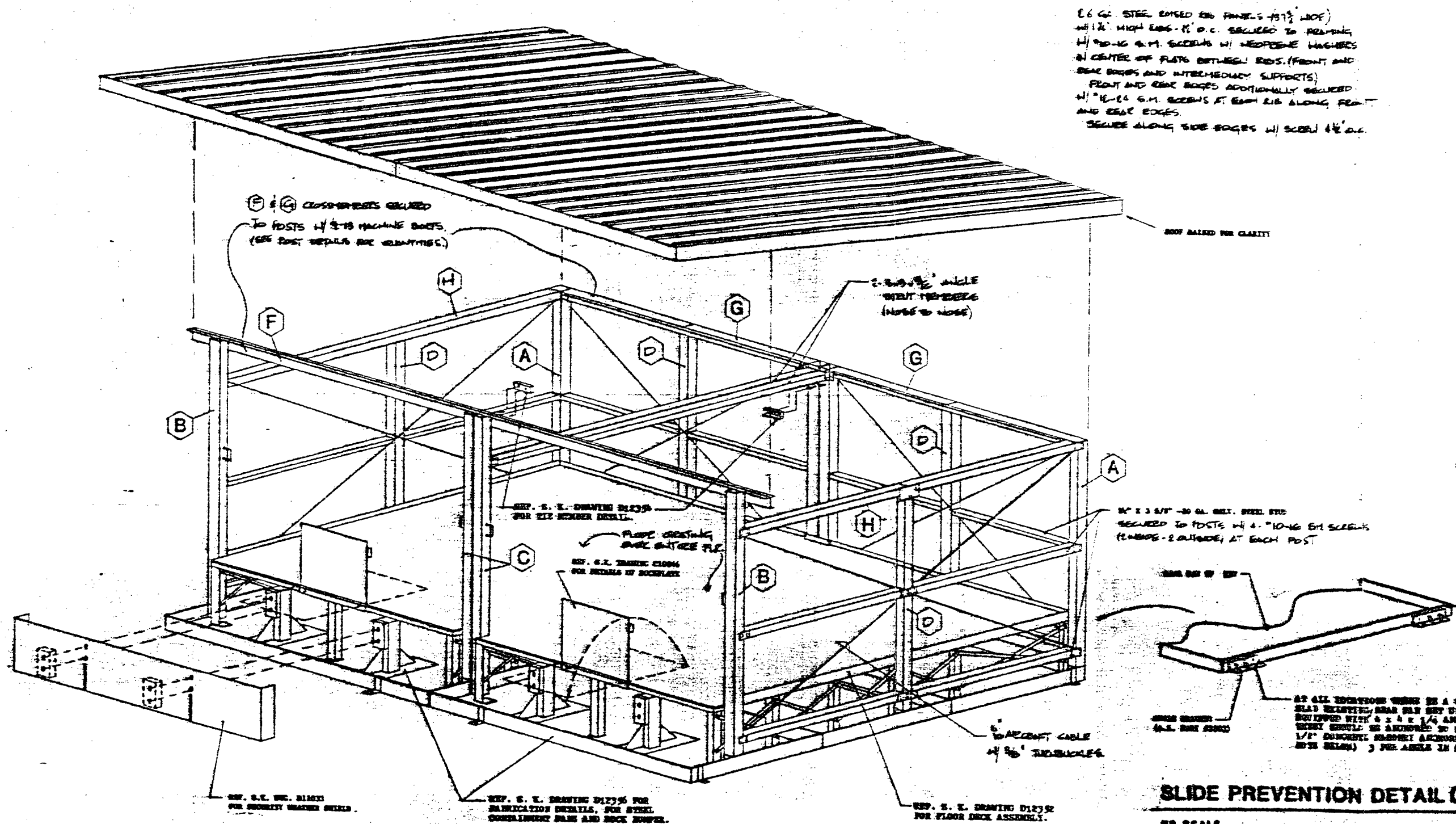
Respiratory Protection (Specify Type)
Respirator as recommended by NIOSH for concentrations above TLV limits.

Ventilation	Local Exhaust Sufficient to keep concentration below lowest TLV.	Special None.
	Mechanical (General) None.	Other None.

Protective Gloves	In cases of prolonged contact, wear rubber gloves.	Eye Protection Yes - eyeglasses, safety glasses.
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Other Protective Clothing or Equipment	N/A
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Work/Hygiene Practices
Do not smoke while using this solvent. Wash hands thoroughly after use and before eating.



PICTORIAL VIEW

SCALE: 1/2"=1'-0"

2.6 GA. STEEL EDGED END PANELS - 19 1/2" WIDE
 W/ 1/2" HIGH EDGE - 1/2" O.C. SECURED TO FRAMING
 W/ 10-16 G.M. SCREWS W/ NEOPRENE WASHERS
 IN CENTER OF PLATE BETWEEN RDS. (FRONT AND
 REAR EDGES AND INTERMEDIATE SUPPORTS)
 FRONT AND REAR EDGES ADDITIONALLY SECURED
 W/ 1/2" 10-16 G.M. SCREWS AT EACH RDS ALONG FRONT
 AND REAR EDGES.
 SECURE ALONG SIDE EDGES W/ SCREW 1/2" O.C.

ROOF RAISED FOR CLARITY

1/2" x 3 1/2" - 30 GA. GALT. STEEL STD.
 SECURED TO POSTS W/ 4" 10-16 G.M. SCREWS
 (2 INSIDE - 2 OUTSIDE) AT EACH POST

END OF SH

SHED ROOF
 1/2" 10-16 G.M. SCREWS

AT ALL LOCATIONS WHERE IS A CONCRETE
 SLAB EXISTING, SHED OR SHED UNIT ARE
 EQUIPPED WITH 2 x 4 x 1/4" ANGLE.
 THEY SHOULD BE ANCHORED TO SLAB USING
 1/2" CONCRETE ANCHORS. (SEE
 DETAIL) 3 PER ANGLE IN HOLES PROVIDED.

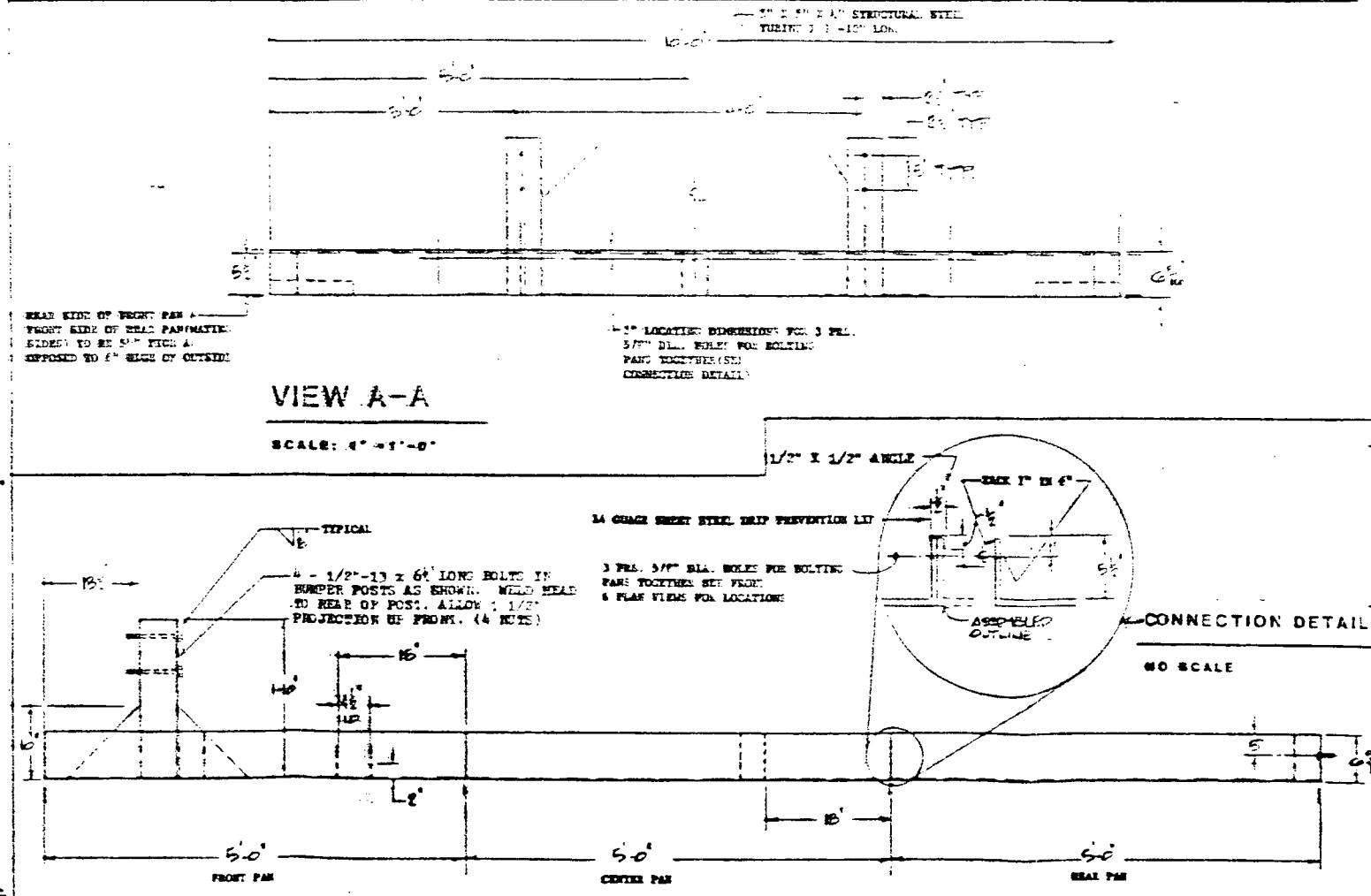
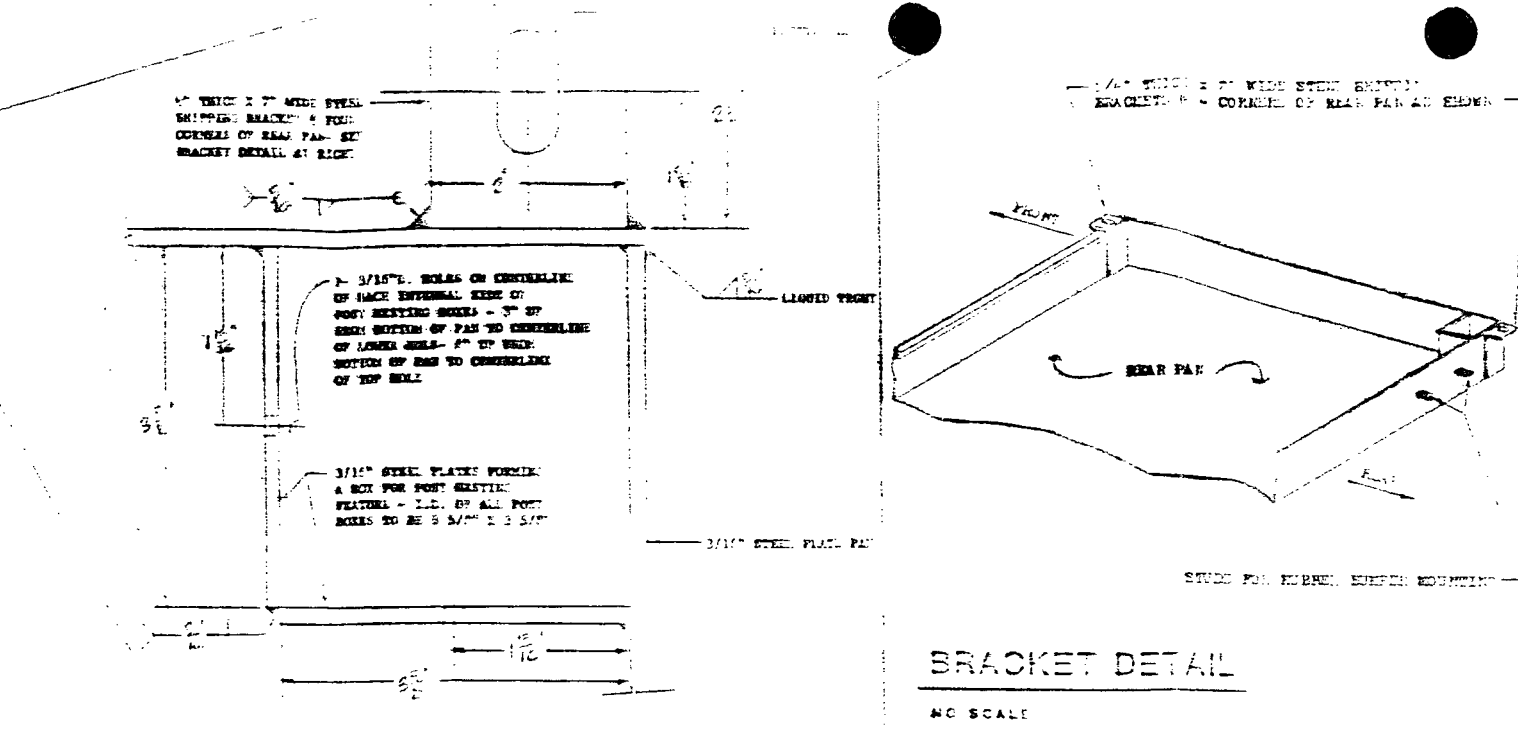
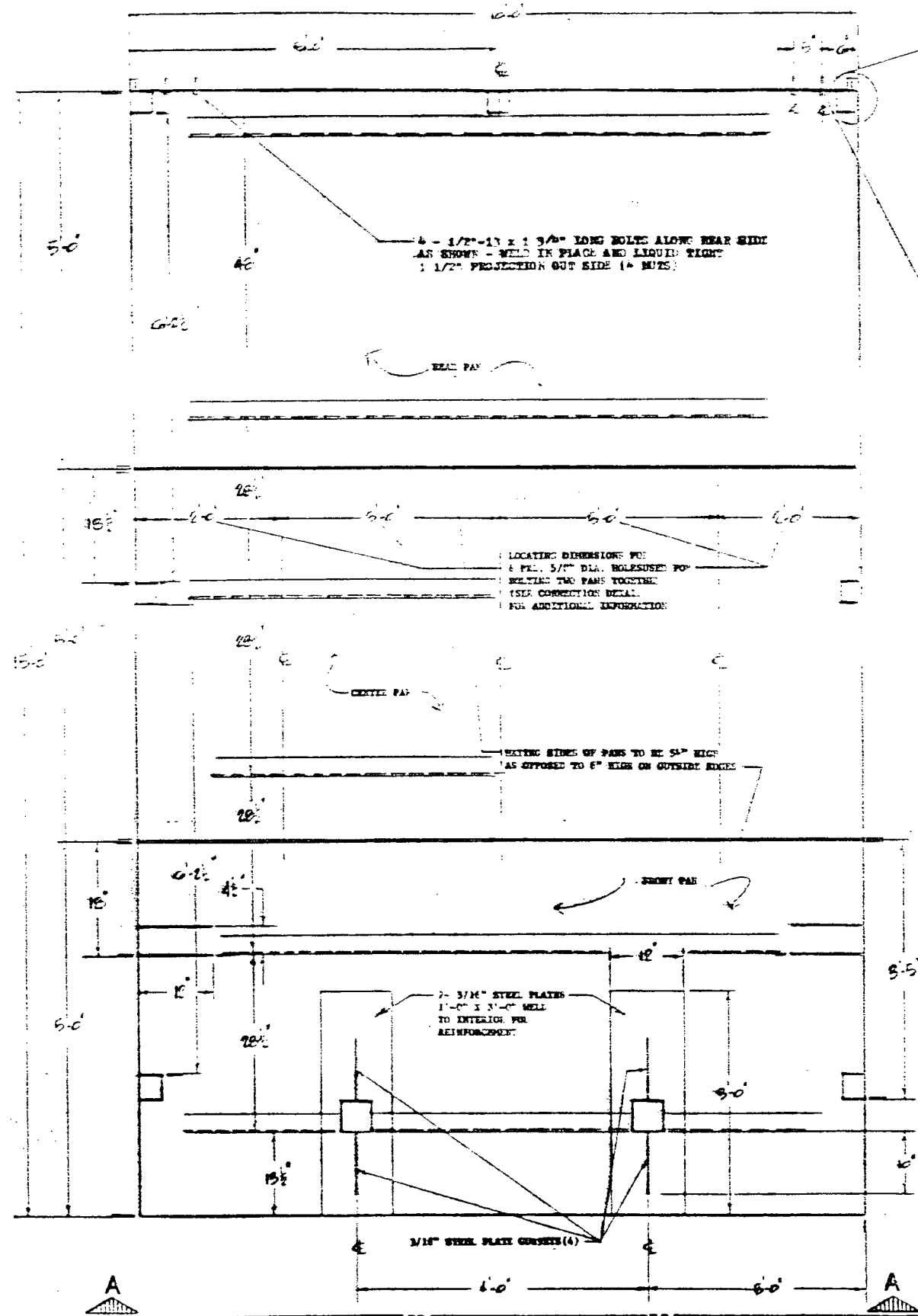
SLIDE PREVENTION DETAIL (REAR)

NO SCALE

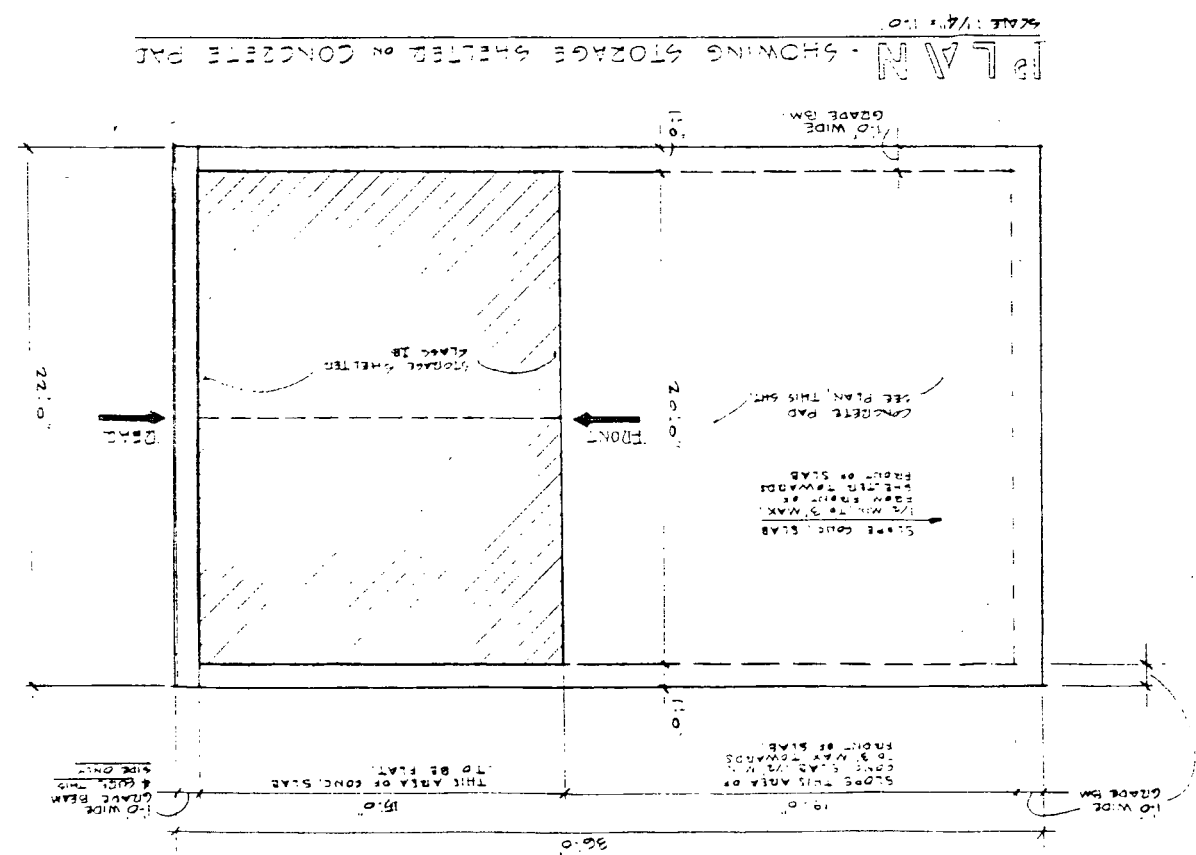
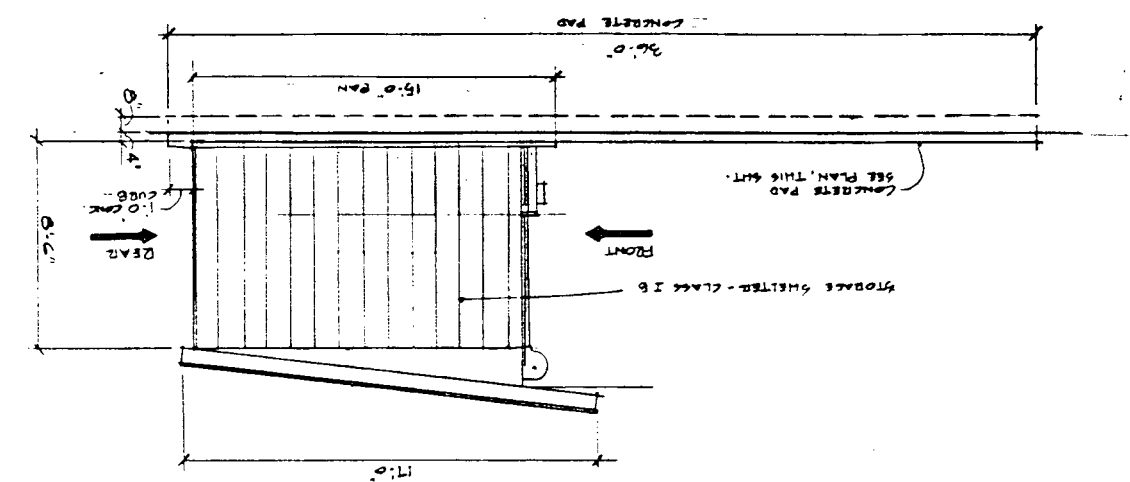
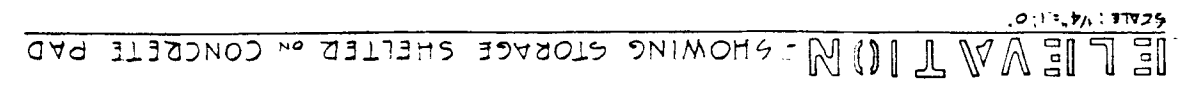
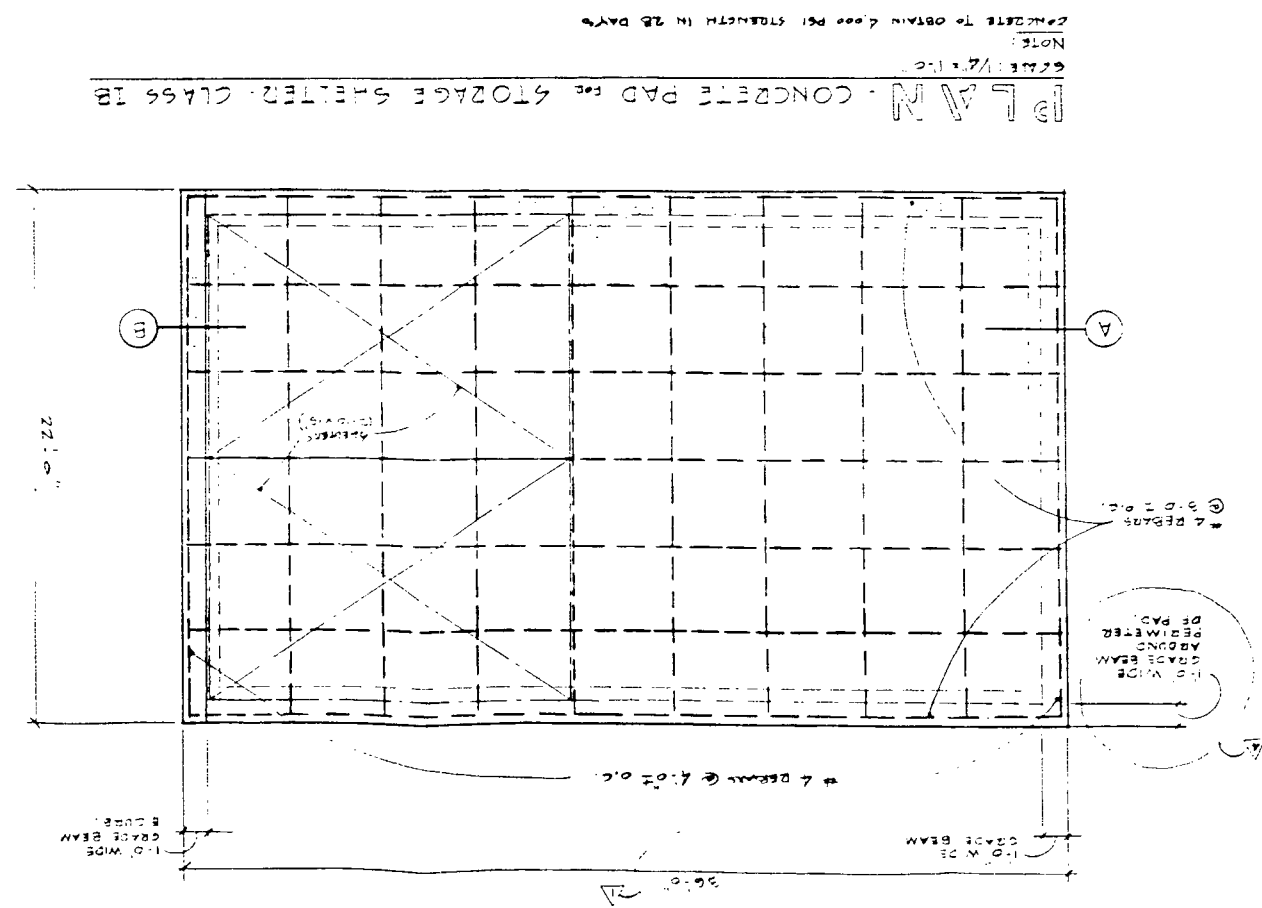
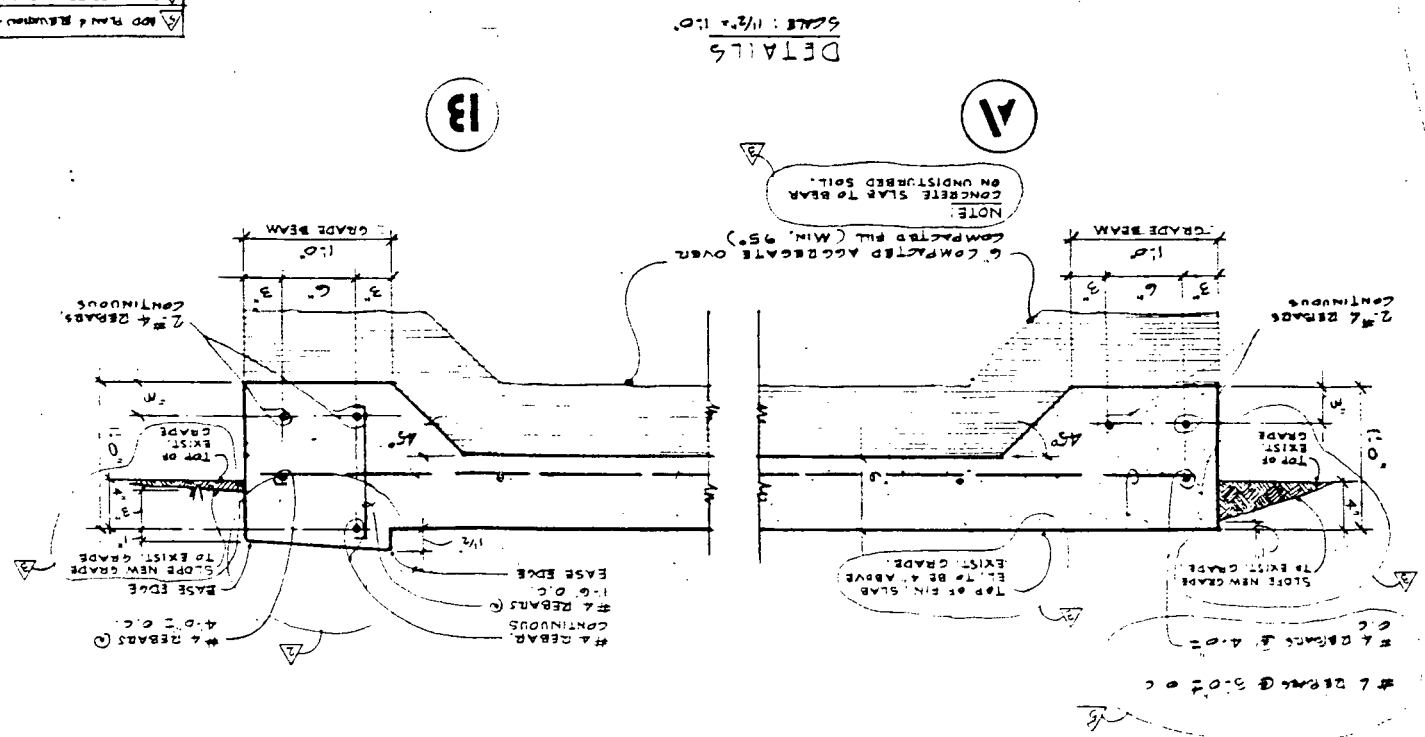
NOTE:

SHELTER IS TO BE ERECTED ON A CONCRETE SLAB,
 USING THE ALONGSIDE BRACKETS ALONG W/ HLT
 FASTENING SYSTEMS INC. MOD. NO. HHS SELF
 POLLING MACHINE AND/OR REC. 1/2" MACHINE
 BOLTS OR EQUIVALENT TO ANCHOR
 SHELTER TO CONC. SLAB.

STORAGE SHELTER - CLASS 1B			
Scale	1/2"=1'-0"	Sheet	1 of 1
Date	8/17/86	By	
Drawn	DMC	Check	
FOR SERVICE CENTER BRANCH: D12350			



SHAW-WALKER CORP.	
FABRICATION DETAILS FOR CLASS IB STORAGE SHELTER	
DATE: 6/1/64	BY: [Signature]
FOR SERVICE CENTER BRANCH 1012356	

[illegible]

ATTACHMENT I.E.2

CONTINGENCY PLAN

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

ORANGE PARK, FL SERVICE CENTER (3-079-01)

161 INDUSTRIAL LOOP SOUTH

SAFETY-KLEEN CORP.

I.E.2.a GENERAL INFORMATION

1. Purpose

The contingency plan and emergency procedures are designed to insure that Safety-Kleen is prepared to address emergency situations rapidly and in such a manner as to prevent or minimize hazards to human health or the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material constituents to the air, soil, surface water, or ground water at the facility.

The provisions of the contingency plan are carried out immediately whenever there is a fire, explosion or release of hazardous materials which could threaten human health or the environment, and according to the procedures contained in this plan which describe the actions facility personnel shall take in response to an emergency.

2. General Description of Activities

The business activities carried on from the Service Center relate to the leasing and servicing of Safety-Kleen Parts Cleaning Equipment, including the provision of a solvent leasing service for the customers. The clean solvents are

distributed from and the used solvents are returned to the service center, where separate aboveground storage tanks are utilized for the storage of clean and used mineral spirits (solvent) and warehouse space is designated for the storage of drums of both clean and used immersion cleaner and dry cleaning wastes (chlorinated solvent).

The mineral spirits are transported in covered, 16-gallon and 30-gallon drums between the Service Center and customers. Upon returning to the Service Center, the used mineral spirits are transferred from the drums into a wet dumpster (solvent return receptacle) in which coarse solids in the mineral spirits are retained. The used mineral spirits in the wet dumpster is pumped into a 15,000-gallon aboveground tank for storage. The used mineral spirits solvent is picked up periodically by a bulk tank truck from our Recycle Center which also at the same time delivers a load of clean mineral spirits. The sludge in the wet dumpster is periodically cleaned out, drummed, and temporarily stored in the drum storage area for later shipment to the Recycle Center for reclamation.

The immersion cleaner remains in 16-gallon, covered drums at all times during transportation and storage. The solvent is not transferred to another container while being used by the customers and in storage at the Service Center. The dry cleaning wastes are picked up at commercial dry cleaning establishments in 15, 16 and 30-gallon drums and stored

temporarily at the Service Center. The drums are picked up periodically for recycling at the Recycle Center.

Exhibits I.D.5-1 and I.D.5-2 showing the basic site and floor plans, particularly, the locations of waste management facilities and emergency equipment and facility storage.

I.E.2.b EMERGENCY NOTIFICATION

1. Emergency Coordinator

The Branch Manager or his designate is the emergency coordinator. Exhibit I.E.2-1 includes the names, home addresses, and both office and home phones of the primary emergency coordinator and his alternates. At all times there is at least one employee either on the facility premises or on call with responsibility for coordinating all emergency response measures. This primary emergency coordinator and alternate emergency coordinator are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out the contingency plan.

2. Emergency Response Agencies and Team Members

The agencies and response team members to be notified whenever there is an imminent or actual emergency are presented in Exhibit I.E.2-1. A Telephone Notification Log is shown as Exhibit I.E.2-2.

3. Employees' Functions During Emergency

A current list of the assigned task(s) of each employee if an incident occurs is shown on Exhibit I.E.2-3.

I.E.2.c ACTIONS OF THE EMERGENCY COORDINATOR

1. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his or her designee when the emergency coordinator is on call) must immediately:
 - a. Activate internal or communication systems to notify all facility personnel. The relatively small size of this Service Center makes direct verbal communication the most expedient form of emergency notification; and
 - b. Notify appropriate state or local agencies with designated response roles if their help is needed.
 - c. Summon the primary emergency coordinator, if he is absent.
2. Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and area extent of any released materials. Because of the limited types of chemicals in storage the identification processes can easily be done visually.

3. Procedure for Assessing Possible Hazard to the Environment and Human Health.

- a. After identification of the character, source, amount and extent of a release, fire, or explosion, the emergency coordinator must decide whether the situation can be contained or cleaned up by plant personnel and equipment.
- b. If a fire or explosion is determined uncontrollable by plant personnel or threatening neighboring establishments or population, assistance from a local emergency response agency shall be summoned immediately and an evacuation order be requested.
- c. In case of a release outside of the containment area which is deemed immediately uncontrollable or unrecoverable, a local emergency response agency and/or specialty cleanup contractor shall be called in.
- d. After termination of a fire or explosion, and containment and preliminary cleanup of a spill, evaluate whether residues in the form of gas or liquid have become airborne, seeped into ground water, and/or flowed into surface water bodies.
- e. Request expert assistance on determining whether the escaped materials are potentially harmful and whether the receiving medium will ultimately be a populated area, public water supply source, a private well or an environmentally sensitive area.
- f. Additional steps shall then be taken to mitigate the potential impact on the environment and human health, in accordance with expert recommendations.

4. If the emergency coordinator determines that the facility has had a release, fire, or explosion that could threaten human health, or the environment outside the facility, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. The coordinator must be available to help appropriate officials decide whether local areas should be evacuated; and
- b. The coordinator must immediately notify the Florida Department of Environmental Regulation (FLDER), Jacksonville, (904) 798-4200 (904/488-1900 - 24 hour number), and the National Response Center (800) 424-8802, by telephone.

The report must include:

- (1) Name and telephone number of notifier;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material(s) involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health, or the environment outside the facility.

Immediate assistance in assessing and responding to an emergency is obtained by the EC by calling the 24-hour emergency number of the Safety-Kleen Corp. Environmental Dept. (312/888-4660).

5. During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and

containing released waste, and removing or isolating containers.

6. If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
7. Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
8. The emergency coordinator must ensure that, in the affected area(s) of the facility:
 - a. No waste that may be incompatible with the released material is treated or stored until cleanup procedures are completed; and
 - b. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
9. The owner or operator must notify the appropriate state and local authorities that the facility is in compliance with paragraph (8) of this section before operations are resumed in the affected area(s) of the facility.

10. The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner must submit a written report on the incident to the FL DER in Jacksonville. The report must include:

- a. Name, address, and telephone number of the owner or operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g., fire, explosion);
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.2.d POTENTIAL SPILL SOURCES

- 1. The following is a list of activities that have the potential for a small scale (less than 30 gallons of waste) pollution incident.
 - a. Moving of drums. Every time a drum is moved, a slight chance exists that it could possibly be tipped over or dropped. To minimize the possibility of spillage of solvent under those conditions, all drums must remain covered before being moved.

b. Delivery truck drum transfers.

- (1) Individual delivery drums contain from 5 to 30 gallons of waste, a quantity which can be contained by oil sorbent clay or pads, if accidentally spilled.
- (2) Each vehicle is equipped with a hoist and hand cart for ease of moving clean solvent off the truck and into the customer's shop and returning the dirty solvent to the truck.
- (3) Clamp type lids are on drums during movement to prevent a spill.
- (4) Each truck should contain a shovel and a quantity of sorbent material to contain a minor spill.
- (5) The cargo should be secured in the route vehicle before transit.

2. Spills Inside Buildings

In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. Then following the instructions of the Material Safety Data Sheet (Exhibits I.E.2-4 through I.E.2-6) the worker would enter the area wearing rubber gloves, boots, or respirator, and mop up the liquid and return it to dirty storage. The cleanup is completed only when the workers have cleaned themselves and the emergency equipment with soap and water.

3. Spills on Concrete Pads

Concrete pads in loading and unloading areas are in most cases equipped with emergency catchment. Under most spill conditions, product can be totally contained on the concrete surface and in the catchment system. Upon containment, arrangements must be immediately undertaken to recover the material. Any soil that may be involved must be removed and treated as a hazardous waste.

4. Tank leaks or spills can occur if a tank or its piping fail. The secondary containment will contain most leaks. The procedures outlined below must be followed.

I.E.2.e SPILL CONTROL PROCEDURES

1. If a harmful discharge occurs:
 - a. Stop the discharge from the drums of used immersion cleaner solvent or dry cleaning waste, if possible, by immediately transferring the liquid to a good drum. Releases from tanks should be stopped and contained in the dike to the extent possible. Solvent should be transferred into a tank of adequate integrity or into a tanker truck.
 - b. Retain, contain or slow the flow of the solvent as much as possible, by diking with sorbent pad or dirt. Appropriate personal protective equipment should be worn. Pump and mop up the liquid into a good drum or tank, and return the drum or tank to storage and then later to the Recycle Center

for reclamation/disposal. The area and equipment that comes in contact with the spill will be decontaminated with soap and water. All residues resulting from containment and decontamination will be collected for proper disposal at licensed facilities.

- c. If solvent escapes the containment efforts, immediately call the emergency response team that specializes in spill cleanup with response time less than two hours (Exhibit I.E.2-1). Record the date, time and name of person taking the message. Call the primary emergency coordinator, if he is absent.
- d. Immediately recover spilled solvent to reduce property and environmental damage using the safety equipment stored on site for such situations (Exhibit I.E.4-2) or call in emergency response contractors (Exhibit I.E.2-1). Start recovery operations immediately.

After recovery of spilled solvent, wash all contaminated impervious surfaces and equipment with soap and water. The residue of spill or fire, contaminated soils and waste waters must be removed and disposed of at licensed facilities. The recovered solvent will be sent to a Safety-Kleen recycle center for reclamation.

- e. Report any incident as soon as possible to Safety-Kleen Corporate Environmental Department on the 24-hour telephone: (312) 888-4660. If the Environmental Department does not respond within thirty minutes, call the National Response Center (telephone: (800) 424-8802) and the FLDER, Northeast District Office: (904) 798-4200 (after working hours, contact the FLDER in Tallahassee: 904/488-1900.
 - f. The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also give the nature of the material spilled (e.g. immersion cleaner) and, if possible, some estimate of the amount, and whether it is near a stream or could enter a stream by flowing through ditches or storm sewers.
- 2. If assistance is needed, the emergency coordinator should describe the containment status and specify any additional equipment needed. When reporting a spill, record the data and time of the call and the name of the person answering the call at the above number.
 - 3. Spill prevention plans are reviewed with facility personnel every year and records of the training are kept at the facility.
 - 4. Every spill must be recorded on the attached form with the revision of the contingency plan to prevent similar spills in the future. A copy of this report is sent to the Corporate Environmental Department so they can respond at any hearings that may result from the incident.

5. Reports of emergency incidents will be reported to the Secretary of the Department of Environmental Regulations or his designee within 15 days of occurrence.

The report shall include:

- (a) Name, address, and telephone number of the owner of operator;
- (b) Name, address, and telephone number of the facility;
- (c) Date, time, and type of incident: (for example, fire explosion);
- (d) Name and quantity of materials involved;
- (e) The extent of injuries, if any;
- (f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (g) Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.2.f FIRE CONTROL PROCEDURES

The following is a list of fire prevention and minimization measures:

- a. All wastes and products are kept away from ignitable sources--
 Personnel must confine smoking and open flames to remote areas, segregated from any solvent (e.g., the office or locker room). The mineral spirits handling area, paint waste shelter and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes are handled so that they do not:
 - 1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The ignitable wastes are stored in a tank or in drums, none of which are near

sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.

2. produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor pressure of mineral spirits is low (2 mm) and all storage areas are well-ventilated. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since vapors will not be allowed to accumulate.
 3. produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a.' above and 'c.' below.
 4. damage the structural integrity of the Safety-Kleen facility--The ignitable solvents will not cause deterioration of the tank, drums or other structural components of the facility.
- c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
 - d. "No Smoking" signs are posted in areas where solvents are handled or stored.
 - e. Fire extinguishers must be checked once per month and tested by the fire extinguisher company once per year.

If a fire occurs, personnel must act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuate the facility and call the Fire Department.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105°F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

Immersion cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and dry cleaning wastes are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200°F). The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.
- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.

IE2-13b

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Paint wastes can generate carbon monoxide and other poisonous gases. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the paint waste shelter occurs:

- a. Isolate the area and deny entry to unauthorized personnel.
- b. Stay upwind; keep away from low areas.
- c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the shelter and containers with water until well after the fire has been extinguished.

I.E.2.g AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

1. This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility.
2. Copies of this document are provided to local authorities and organizations listed under the Preparedness and Prevention Plan, which may be called upon to provide emergency services.
3. This plan and all revisions to the plan are made readily available to employees working at the facility.

4. The plan is reviewed and updated, if necessary, whenever:
- a. The facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
 - b. The list or location of emergency equipment changes;
 - c. The facility changes in its design, construction, operation

I.E.2.h ARRANGEMENTS WITH LOCAL AUTHORITIES

1. Arrangements have been made to familiarize the Police Department, Fire Department and local emergency response teams with the layout of the facility, properties of hazardous materials handled (Material Safety Data Sheets) at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.
2. Potential primary and secondary spill control contractors as well as sorbent suppliers are identified in the Contingency Plan and Emergency Procedures.
3. Arrangements have been made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which would result from fires, explosions, or releases at the facility.

The following exhibits include copies of letters which have been transmitted to local authorities for emergency response in the event of an incident where public health or environment is threatened.

Exhibit I.E.2-8 Letter to Local Police Department

Exhibit I.E.2-9 Letter to Local Fire Department

Exhibit I.E.2-10 Letter to Local Hospital

I.E.2.i EVACUATION PLAN

1. In an uncontrolled emergency, all persons are to be evacuated from the area by means of a verbal cry and assemble across from the entrance drive to the facility. Insure all personnel are accounted for and out of the area. Primary and alternate evacuation routes are shown in Exhibit I.D.5-2.
2. The fire department must be notified at the time of evacuation either from a safe on-site building or neighboring facilities.
3. Clearly marked exits exist in warehouse and office area.

I.E.2.j REQUIRED REPORTS

A discussion of records to be kept and reporting procedures to be followed in the event of a spill is presented in Sections I.E.2-c.4 and I.E.2-c.10.

I.E.2.k AVAILABLE EQUIPMENT AND COMMUNICATION

Due to the small size of the facility, routine communication is accomplished by voice communication without the need for an intercom or alarm. Telephones are used in case of a spill or fire emergency to summon assistance. Emergency numbers are posted by each phone in the office. Included with these phone numbers is the 24-hour spill number which connects to Corporate Environmental Department at the corporate office in Elgin, Illinois. See Exhibit I.D.5-2 for locations of telephones, fire extinguishers, the first aid kit, and the emergency eyewash. Other emergency response

equipment are kept in a small storage area inside the warehouse near the return/fill dock; the equipment includes mops and bucket, soap, shovels, and spill sorbent pads. Rubber gloves, boots, pumps, and wet/dry vacuum cleaner are stored in an emergency supply area near the drum storage area. Exhibit I.E.4-2 summarizes the type, quantity, storage location, and capabilities of all the emergency equipment available at this Service Center. The Kingsley Water Service Co. supplies well water for domestic use, decontamination, and fire fighting. Adequate aisle space is provided in the drum storage area for movement and emergency situation.

The equipment available at the Service Center for emergency situations has shown to be adequate for most cases. Large or serious emergency situations have been assisted by local emergency response teams or special emergency response or cleanup contractors. The facility is constructed and operated in accordance with National Fire Protection Association (NFPA) standards and applicable local ordinances. Applicable health and safety standards are also observed at the Service Center. A recent air quality survey conducted by an independent industrial hygienist at the Los Angeles Service Center has shown that air quality at a typical Service Center is within Threshold Limit Values (TLV) as specified by OSHA and local air pollution control criteria and no respirator or special protection unit is deemed mandatory.

EXHIBIT I.E.2-1

EMERGENCY NOTIFICATION

Emergency Coordinators

Primary: Paul Johnson
2378 Timber Lane
Orange Park, FL 32073
Home: (904) 269-5925
Office: (904) 264-2607

Alternates: J. C. Chandler
3665 Jamies Road
Jacksonville, FL 32210
Home: (904) 771-3751
Office: (904) 264-2607

Emergency Notification Phone Numbers

Safety-Kleen Environmental Department
Telephone (312) 888-4660 (24-hour number)

National Response Center
Telephone (800) 424-8802

DER, Northeast Dist. 3426 Bills Road, Jacksonville, FL 32207 (904) 798-4200
DER, Tallahassee Office - 24 Hour Number: (904) 488-1900

Emergency Team to be Notified

Orange Park Fire Department
333 Stowe Avenue
Orange Park, FL 32073
(904) 264-3737

O.H. Materials Company
P.O. Box 551
Findlay, OH 45840
(800) 537-9540
(Primary Clean-Up Contractor)

Orange Park Police Department
333 Stowe Avenue
Orange Park, FL 32073
(904) 264-2475

AMO Pollution Services, Inc.
P.O. Box 311B
Canonsburg, PA 15317
(800) 325-1398
(Secondary Clean-Up Contractor)

Humana Hospital
2001 Kingsley Avenue
Orange Park, FL 32073
(904) 272-8500

Ryckman's Emergency Action and
Consulting Team
P.O. Box 27310
St. Louis, MO 63141
(800) 325-1398
(Secondary Clean-Up Contractor)

contamination of ground water and surface water around and beneath the site region. Surface run off at the site will not come in contact with storage in the waste management area.

I.E.4.h INCOMPATIBLE WASTES

Reactive and/or incompatible waste is not handled at the facility.

All waste or products are kept away from ignitable sources when being handled. The employees confine smoking or open flame to designated safe areas.

Materials are handled so that they do not:

- a. Generate extreme heat or pressure, fire or explosion, or violent reaction.
- b. Product uncontrolled toxic mists, fumes, dusts or gasses in sufficient quantities to threaten human health.
- c. Produce uncontrolled fires or gases in sufficient quantities to pose a risk of fire or explosion.
- d. Damage the structural integrity of the Safety-Kleen facility.

Adequate aisle space is maintained to allow unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

I.E.4-i RESPONSIBILITY FOR PREPAREDNESS AND PREVENTION PLAN

The preparedness and prevention plan as well as the training of employees for its implementation is the responsibility of the Branch

EXHIBIT F-1
FACILITY INSPECTION RECORD AND PROCEDURE

PERIOD _____ WEEK _____ WEEK BEGINNING DATE _____

NAME OF INSPECTOR: _____

Remarks/Corrective Action
(Include Date of Repair or
Remedial Action, Attach
Additional Sheet if Necessary)

TIME: _____

Item* Mon Tue Wed Thu Fri

Solvent Tank Reading					
#1 Clean (inches)	_____				
#2 Clean (gallons)	_____				
#1 Used (inches)	_____	_____	_____	_____	_____
#2 Used (gallons)	_____	_____	_____	_____	_____
#3 Used - Sludge (inches)	_____				
#4 Used - Water (inches)	_____				
#5 Solvent Dispensing Hose	_____	_____	_____	_____	_____
#6 Pump Valves and Pipe Fittings	_____				
#7 Tank Inspection	_____	_____	_____	_____	_____
#8 All Drums Storage Areas	_____	_____	_____	_____	_____
#9 I.C. Clean/Used	_____	_____	_____	_____	_____
#9 M.S. Dumpster Mud	_____	_____	_____	_____	_____
#9 Dry Cleaning 16s/30s/15s	_____	_____	_____	_____	_____
#9 Paint Wastes: 55/lbs.	_____	_____	_____	_____	_____
#10 Containment Systems	_____	_____	_____	_____	_____
#11 Used - Labelling & Damages	_____	_____	_____	_____	_____
#12 Route Vehicle Check	_____	_____	_____	_____	_____
#13 Safety Equipment	_____	_____	_____	_____	_____
#14 Wet Dumpster	_____				
#15 Dry Dumpster	_____				
#16 Fire Extinguishers	_____				
#17 Eye Wash & First Aid Kit	_____				
#18 Absorbent	_____				
#19 Other Emergency Equipment	_____				

#20 Security Gates and Locks	_____	_____	_____	_____	_____
#21 Security Fence	_____				
#22 Loading/Unloading Areas	_____	_____	_____	_____	_____

* See Instructions on Reverse Side of Form.

2/28/85

- Item #1 - Watch for high level alarm, if available. The alarm is to be manually tripped to check its condition. Read level gages or measure depth of solvent in inches. Record reading in inches. Contents not to exceed 95% of tank capacity.
- Item #2 - Convert tank readings from inches to gallons using outage table.
- Item #3 - Measure sludge depth and record reading in inches, for underground tank only.
- Item #4 - Measure depth of water and record reading in inches, for underground tank only. Use water finding paste available Part. No. 3339 New Berlin.
- Item #5 - Inspect solvent dispensing hose, connections and valve for any leaks or damage that could cause a leak to develop. All hose should be drained and its contents discharged into the storage tank.
- Item #6 - Check pump, pipe and fittings for leakage.
- Item #7 - Underground tanks should be noted to prevent overflow and for evidence of leaks such as unexpected deviation in tank measuring data or sudden drop in liquid level and unloading data and sudden drop of liquid level; excess water in the clean solvent tank should be transferred to the used solvent tank. Aboveground tanks should be noted for corrosion or leaking at joints, seams, and other corrections; examine dike and sump areas to detect erosion or obvious signs of leakage.
- Item #8 - Inspect the drum storage areas for leaks.
- Item #9 - Record the number of drums on-hand.
- Item #10 - Inspect to detect deterioration and failure of the containment system and container placement and stacking.
- Item #11 - Check to make sure all drums containing wastes are properly labelled as required regarding identification, date, loading data and hazardous waste label. Drums shall be inspected for damages or rust to the point of near leakage. Damaged, missing, or loose fasteners shall be replaced or adjusted.
- Item #12 - Each route vehicle at the facility must be inspected daily to insure the proper operation of brakes, lights, turn signals, emergency flashers, and wipers. Trucks dispatched from Recycle Center should be noted for its operations.
- Item #13 - Route vehicle safety equipment check, including sorbent, eyewash, fire extinguisher, first aid kit and reflector kits. Any equipment that is inoperative or unavailable shall be immediately replaced or repaired.
- Item #14 - Inspect wet dumpster for leaks and excess dumpster mud built up.
- Item #15 - Inspect dry dumpster to insure that no liquids are being placed in the unit.
- Item #16 - Fire extinguishers must be checked to insure that the tag date has not expired and that the units are properly charged and accessible. Must be inspected by a fire service supplier on a yearly basis.
- Item #17 - Eye wash stand inspected for accessibility weekly. Once per month check operation. Check inventory of first aid kit.
- Item #18 - Check supply in Service Center.
- Item #19 - Inspection for existence, conditions and/or adequate supply of emergency equipment such as safety glasses, rubber gloves, and boots, shovels, pumps/wet-dry vacuum and mops; and respirator, protective clothing, face-shield and inter-com, if available.
- Item #20 - Security gates and locks must be checked for sticking, corrosion, or other uncommon activities.
- Item #21 - Security fence must be checked for deterioration, gaps under fence, and broken wire ties.
- Item #22 - Look for stain or liquid in and around all loading/unloading areas.

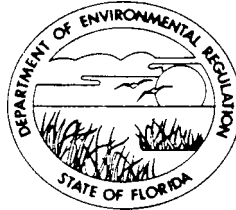
EXHIBIT I.E.4-2
EMERGENCY RESPONSE EQUIPMENT

<u>Description</u>	<u>Type/Capacity</u>	<u>Location</u> (Shown in Exhibit I.D.5-2)	<u>Quantities</u>
Fire Extinguisher	ABC (10 lb.)	Warehouse	5
Eyewash	Fountain	Warehouse	1
First Aid		Warehouse	1
Telephones	Standard	Warehouse	1
Telephones	Standard	Office	4
Gloves	Rubber	Emergency Equip. Area	Min. 1
Boots (optional)	Rubber	Emergency Equip. Area	Min. 1
Protective Clothing	Apron	Emergency Equip. Area	1/Employee
Eye Protection	Goggles/Safety Glasses	Emergency Equip. Area	Min. 1
Sorbent Material	Oil Absorbing	Warehouse	Min. 1 Bale
Shovel	Standard	Warehouse	Min. 1
Mop & Bucket	Standard	Warehouse	Min. 1
Respirator (optional)	Filter Cartridge	Emergency Equip. Area	(Optional)
Pump	Handheld, Electric	Emergency Equip. Area	Min. 1
Wet/Dry Vacuum	Portable, Electric	Emergency Equip. Area	1

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

March 10, 1987

CERTIFIED - RETURN RECEIPT

Mr. Stanley Walczynski
Regional Environmental Engineer
Safety-Kleen Corporation
717 Big Timber Road
Elgin, Illinois 60120

Dear Mr. Walczynski:

Safety-Kleen Corporation - Orange Park
FLD 980 847 214
Clay County - Hazardous Waste
Construction Permit Application #HC 10-128082
Second Notice of Deficiency

We are in receipt of your submittal dated January 28, 1987. A review of this submittal revealed that the information which you have provided is not adequate. Proper responses to the following items are required to complete the permit application in accordance with FAC Rule 17-30.220.

1. Exhibit I.E.3-9 does not show that the sealant used to fill the gaps and cracks in the bottom pan and in the rest of the metal shelter will not react with the hazardous waste stored in it. Provide this information. [40 CFR 264.175(b)]
2. The design drawings neither describe the slope of the bottom of the shelter nor do they describe whether all spillage in the shelter will drain to the pan. This information is very important and must be submitted in detail. [40 CFR 264.175(c)]
3. Provide design drawings for the secondary containment system. Also show how accumulated liquids in the containment system will be analysed and removed in as timely a manner as is necessary to prevent overflow. Describe and list the equipment to be used for removal of collected liquids. [40 CFR 264.175(b)(5)]
4. Provide information showing how the run-on into the containment system will be controlled. Also show how the run-off from the metal shelter will be controlled. [40 CFR 264.175(b)(4)]

Mr. Stanley Walczynski
March 10, 1987
Page two

5. Show how and what temperature will be maintained in the shelter to prevent ignition, fire or explosion. This information must be based on the hottest possible day of the year. Consider that on the hottest day, the open air temperature is approximately 100° to 105°F and the air temperature inside the shelter may reach 130° to 150°F because of the radiant heat effect in a closed metal shelter.
6. Provide engineering evaluation for the structural integrity of the base, considering the maximum drums stored at any one time. [40 CFR 264.175(b)(1)]
7. Provide the design drawings showing adequate aisle space in the metal shelter. [40 CFR 264.173]
8. Your submittal dated January 28, 1987 references Page I.E.4-8, which is not included. Please provide this page with your next submittal.
9. Provide an inspection schedule describing how often monitoring, emergency, safety, operating and structural equipment, and security devices will be inspected. Also include how often the facility and containers will be inspected to check for leaks or cracks. An inspection log or summary including the following must be maintained at the facility:
 - (1) Dates and times of inspections.
 - (2) Name(s) of inspector(s).
 - (3) Observation made.
 - (4) Date and nature of repairs or remedial actions.
[40 CFR 264.15, 264.174]
10. Provide a list of equipment to be kept in this metal shelter for safety and remedial actions. [40 CFR 264.32]
11. Page II-5 of your last submittal dated January 28, 1987, states that the shelter does not meet the 50 foot buffer zone requirement for ignitable waste. Provide documentation of any variance or approval is received from the fire marshal or fire commissioner.
12. The last sentence on Page I.E.4-7a of your last submittal is incomplete. Please provide a new page after correction.

Mr. Stanley Walczynski
March 10, 1987
Page three

13. During inspection of this facility last month, our staff found that there was no "Hazardous Waste" sign on the tank and that there were no "Danger - Unauthorized Personnel Keep Out" signs on the east and back of the fence. These signs must be posted immediately and maintained as long as the facility operates.

They also found that the front gate was open and there were no security personnel at the gate. 40 CFR 264.14 requires facilities to control entry of persons or livestock onto the active portion of the facility. Please provide information describing what corrective measures are taken and how compliance with this regulation will be maintained.

Please send us four copies of your response to this letter. Failure to provide the required information within thirty (30) days of receipt of this letter may result in denial of your construction permit. Your application will be held in abeyance until the required information is received.

If you have any questions regarding this letter or wish to arrange a conference to discuss your application, please telephone me at (904) 798-4200.

Sincerely,



Ashwin B. Patel
Hazardous Waste Supervisor

BFW
ABP:jf

cc: Satish Kastury
Bob Githens
Ellen C. Jursczak