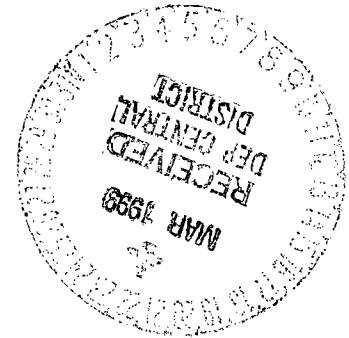




19 March 1999

FedEx Airbill
#804684331379

Mr. Robert Snyder, PE
Hazardous Waste Program Manager
Florida Department of Environmental Protection
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767



Re: Safety-Kleen Systems, Inc.
Sanford, Florida Service Center
FLD 984171165
Intent to Issue Permit
Comments on Draft Permit # HO01-0022198-001

Dear Mr. Snyder:

Safety-Kleen Systems, Inc. (Safety-Kleen) has reviewed the above referenced draft permit and we would like the Department to consider the following comments.

done
Item 1 - Page 1 of 28 - second paragraph

The Department has outlined some of the types of services that the Service Center offers. The services mentioned deal mainly with the parts cleaning line of business. Safety-Kleen would like the Department to consider adding additional services which the company offers. This could be accomplished by adding the following statements to the end of the second paragraph. "In addition to the parts cleaning service, the company operates a Fluid Recovery Services (FRS) program which collects various non-hazardous and hazardous spent solvents and fluids from generators for off-site reclamation. These wastes are handled on a transfer basis. Safety-Kleen also collects dry cleaning solvent wastes, paint wastes, used oil, spent antifreeze, and mercury containing lamps and devices. The handling and management of these wastes are described in subsequent sections of the operating permit." *OK*

done
Item 2 - Page 2 of 28 - Container Storage Area - #4

Spent antifreeze collected in containers is not typically mixed with used oil. Spent antifreeze in containers is normally handled and treated as a hazardous waste. This antifreeze is usually not recycled. Recycled antifreeze is generally limited to antifreeze which is mixed with oil in the bulk oil tanker truck. The mixture is sent to an oil re-refinery where the antifreeze is extracted for further processing into a recycled material. *where the oil is recycled*

OK
Item 3 - Page 4 of 28 - #3 - Third sentence

Safety-Kleen would like the Department to consider adding the following to the end of the sentence - , or similar facilities. The sentence would read, "The ethylene glycol/used oil mixture is transferred by rail to the Safety-Kleen re-refinery in East Chicago, Indiana, or similar facilities." *OK*

done
Item 4 - Page 17 of 28 - Part II - Container Management - #1 - Last sentence

Safety-Kleen would like the Department to clarify the last sentence by considering the following change. The elimination of ("approved operation plan") and changing this to "permit application". The sentence would read - "Containers must conform to DOT specification or UN performance criteria and be managed in accordance with the permit application".

Item 5 - Page 19 of 28 - Part III - Tank Management - #4

Under #4 the second sentence reads " If alternate products (Premium Solvent or Actrel) are stored in the product storage tank, the Department must receive verbal notice from the Branch Manager 24 hours prior to filling the tank". It appears that the "product storage tank" reference in the above sentence may actually be referring to the waste solvent tank. Safety-Kleen would like the Department to clarify this issue. If the Department is referring to the waste solvent tank it is our understanding that the permitted hazardous waste tank would need to undergo formal closure prior to the addition of any product.

Item 6 - Page 19 of 28 - Part III - Tank Management - #5

In the second sentence a reference is made to 40 CFR 64.196(e). Safety-Kleen requests that this reference be changed to 40 CFR 264.196(e).

Item 7 - Page 22 of 28 - Part V - Waste Minimization

The conditions outlined in the draft operating permit concerning waste minimization appear to be directed towards manufacturing operations. The amount of waste generated at the Tampa Service Center is contingent on business conditions. As the service center acquires new customers the amount of waste generated/shipped from the facility will increase in portion to the new growth in business. Safety-Kleen supports waste minimization practices by promoting where applicable off-site recycling of the wastestreams collected by the facility. Safety-Kleen also has programs in place to help our customers minimize their generation of hazardous waste (i.e. the cyclonic parts washers, offering products such as premium solvents and aqueous solutions for cleaning which may be handled as nonhazardous depending on hazardous waste characterization test results). Safety-Kleen instructs employees on waste minimization practices. Our program has the support of senior management. The waste minimization program is available for review at the facility. The program does contain many of the elements described under Part V of the draft operating permit however, some of the conditions under sections c, d, e, and f of Part V may be difficult to comply with given the nature of our business operations.

Item 8 - Table 7.1-1 - Permitted and Transfer Wastes

When the permit application was submitted this table contained a couple of errors. In order to clarify the star symbol (*) references the following changes need to be made to the table. Under Mercury-Containing Lamps/Devices the reference in the process code column should be N/A***. Below the table the four star **** reference should be changed to three star ***.

Item 9 - Table 7.2-1 - Parameters and Rationale for Hazardous Waste Identification

Under Dry Cleaning Wastes (#5) in the third column headed as Rationale, Safety-Kleen would like the Department to add F002 to the perchloroethylene formula (see attached revision).

If you have any questions concerning these comments please contact me (813) 626-0052.

Sincerely,



Richard R. Morris
Environmental Health & Safety Manager

rrm

Attachment

ATTACHMENT

NO: I

TABLE 7.2-1

PARAMETERS AND RATIONALE
FOR HAZARDOUS WASTE IDENTIFICATION

Hazardous Waste	Parameter ^a	Rationale
1. Used Parts Washer Solvent	Flash Point TCLP	May exhibit ignitable characteristics (D001); may contain TCLP compounds.
2. Parts Washer Solvent Tank Bottom Sludge and Free Water	TCLP Flash Point	The sludge and free water may contain TCLP compounds and the sludge has a flash point of 105° F (D001).
3. Parts Washer Solvent Dumpster Mud	TCLP Flash Point	The mud and free water may contain TCLP compounds and the sludge has a flash point of 105° F (D001).
4. Used Immersion Cleaner (699IC)	TCLP	May contain TCLP compounds.
5. Dry Cleaning Wastes (Perchloroethylene)	Perchloroethylene TCLP	Three separate formulas exist for dry cleaning products. (F002) Perchloroethylene formula is the only waste managed as a permitted waste. It may contain TCLP compounds.
6. Paint Wastes	Acetone Isopropyl Alcohol Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylenes Acetate Compounds Flash Point TCLP	Contains ingredients of F003 and F005 wastes, and may contain TCLP compounds. May exhibit ignitable characteristics (D001).
7. Aqueous Brake Cleaner	TCLP	May contain TCLP compounds.
8. Aqueous Parts Washer	TCLP	May contain TCLP compounds.

NOTES:

^a TCLP Waste Codes: D004-D011, D018, D019, D021-D030, D032-D043.