

From: [Curtis, Jeffery S](#)
To: [Russell, Merlin](#)
Cc: [Baker, Bryan](#); [White, John](#); [McBride, Ashanti](#)
Subject: RE: 190213 SK Sanford DRAFT Operating Permit Comments+BK+JW+B2
Date: Monday, February 18, 2019 11:13:57 AM

Merlin,

Thanks for the clarification. I don't have any other questions or comments on the draft permit.

Jeff

From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Monday, February 18, 2019 9:03 AM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; White, John <John.White@dep.state.fl.us>;
McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>
Subject: RE: 190213 SK Sanford DRAFT Operating Permit Comments+BK+JW+B2

Jeff,

Even if the language was not in the other SK permits, the regs still apply. The language in this draft is nearly identical to the existing permit. In any case, this is how it works:

The maximum storage capacity in the permitted container storage unit can never be exceeded (without going through a major permit modification). Any non-hazardous waste or transfer waste stored in the container storage unit eats away at the total capacity of the permitted container storage unit. If the permitted capacity is 5,000 gallons and you stage 1,000 gallons of transfer waste in it, then you cannot store more than 4,000 gallons of permitted waste in it. In your case, there is another transfer waste area outside the permitted container storage unit that could be used for the remainder of the transfer waste allowed under your notification. Call if you have questions.

merlin

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Friday, February 15, 2019 3:15 PM
To: Russell, Merlin <Merlin.Russell@dep.state.fl.us>
Subject: RE: 190213 SK Sanford DRAFT Operating Permit Comments+BK+JW+B2

Hello Merlin,

I have reviewed the draft permit and would like clarification on one item. Under Hazardous and Universal Waste Registrations there are two sentences stating "The Permittee may store up to 11,880 gallons of waste in the transfer facility area at any one time in accordance with the maximum design capacity for storage limit reported on their Transfer Facility Notification Form. The storage amount in the transfer area counts against the total hazardous waste storage capacity of the facility,

6,912 gallons.”

After review of the last 4 SK permits issued, I don't see this specific language in any of them. Does this mean that between both permitted and transfer hazardous waste, the total capacity we would be allowed on-site at one time is 6,912 gallons?

Thanks, Jeff

From: Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]

Sent: Wednesday, February 13, 2019 8:00 AM

To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>

Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; White, John <John.White@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>

Subject: 190213 SK Sanford DRAFT Operating Permit Comments+BK+JW+B2

Good Morning Jeff,

Attached is a courtesy draft for your review. I'd appreciate a quick turnaround time if at all possible. Thank you.

merlin

