



December 16, 2019

Ms. Carrie Kruchell
Professional Geologist II
Hazardous Waste Program & Permitting
Florida Department of Environmental Protection
2600 Blair Stone Rd., MS #4560
Tallahassee, FL 32399-2400

HWPP@dep.state.fl.us

RE: Request for Additional Information (RAI)
Hazardous Waste Operating Permit Application
Safety-Kleen Systems, Inc.
4426 Entrepot Blvd., Tallahassee, Leon County
FLD 984 171 165
DEP Application No. 009207-011-HO

Dear Ms. Kruchell:

Safety-Kleen (SK) has prepared this letter to respond to the permit application first request for additional information letter from the Department dated October 11, 2019. We have identified each of the Departments comments in bold, followed by our response. A revised permit application is also being sent to the Department's office in Tallahassee and the FDEP Northwest District Office.

General Permit Application Comments and Deficiencies:

- I. Any revised pages of the application should note the Revision Number and Date of the revision in the top right corner

SK Response: Revised pages of the application are noted with the revision number, and date of the revisions in the top right corner.

- II. The relevant information required for the RCRA permit application is significantly difficult to locate in order to facilitate review for completeness and technical adequacy. The Department recommends that Safety-Kleen (SK) revise the application to be consistent in layout, format and informational content required by 40 CFR Part 270 (see link below) in the RCRA permit application checklists (Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF) Regulations, page 14.
[https://www.epa.gov/sites/production/files/2018-12/documents/hazardous waste tsdf regulations user friendly reference document nov 2018.pdf](https://www.epa.gov/sites/production/files/2018-12/documents/hazardous_waste_tsdf_regulations_user_friendly_reference_document_nov_2018.pdf)

SK Response: A revised permit application has been prepared that is consistent with the layout, format and informational content required by 40 CFR Part 270.

- III. The application must also include a table of contents.

SK Response: The revised application includes a table of contents.

- IV. The activities and units are generally discussed. Much of the information provided is located in the Contingency Plan rather than facility description. The units used and area of the facility used for less than 10-day transfers, separating waste in transfer from hazardous waste management activities and used oil and spent antifreeze must be discussed in specific detail and on the facility layout diagrams for clarity of the permit and for inspection. Revise the application to clearly define the areas used for each activity – transfer only, waste oil, antifreeze, universal waste management and hazardous waste; the container used for each – type and DOT type per waste managed, storage procedures for the specific areas, tracking system, procedures for operating the wet dumpster, compliance with RCRA Organic Air Emission Standards (ROAES) for containers, tanks, equipment and wet dumpster, inspections per RCRA – for tanks, containers, wet dumpster, ROAES – including inspection forms, monitoring forms, instructions and inspection training, secondary containment construction and capacity. (40 CFR Parts 270, 264, 273).

SK Response: The above information is included in the revised permit application.

- V. In Part I, Section B of the application, SK states that they receive waste in containers, tanker trucks (route trucks), have a wet dumpster (a mechanical miscellaneous unit regulated under Subpart X), and five (5) storage tanks. These units must be included in the Part A. Revise the application to include complete Part A and Part B information and descriptions of these hazardous waste management units (HWMUs). For the Part B, HWMU information must include – but is not limited to – identification of each HWMU, construction drawings and process flow diagrams, waste managed, location, inspection procedures, operation and personnel training requirements to operate the area.

SK Response: The above information has been included in the revised permit application.

- VI. For compliance with 40 CFR Part 264 Subpart CC, the application must specify the waste streams the HWMUs manage including identifying the DOT container types.

SK Response: The revised application specifies the waste streams the HWMUs manage including DOT container types (Part II.S, Figures 11.2-1/11.2-2).

- VII. The Department recommends the use of the tables attached (Attachment B) to organize Subpart BB and CC subject equipment and HWMUs.

SK Response: Subpart BB and CC information is found in Part II.S of the revised permit application.

VIII. Figures:

- a. All figures throughout the application shall be revised to include the wording and an arrow pointing to the "FRS 10-day Transfer Waste" inside of the permitted Container Storage Area (CSA).
 - i. *Revisions received on October 9, 2019.*
- b. All figures showing the permitted Tank Storage Unit should be revised as follows:
 - i. The description for the Used Solvent aboveground storage tank (AST) shall be revised to "RCRA-Permitted Hazardous Waste Tank (in parentheses specify either Used/Spent or Waste Solvents" – be constituent with the description for all figures. For example, Figure 5.6-5 refers to this AST as "Hazardous Waste Parts Washer Solvent Tank"; and,
 - ii. "Covered Dike Area" shall be revised to "Permitted Tank Storage Unit (Secondary Containment)", in keeping with the operating permit language.
- c. All figures illustrating tanks should note in the Legend that all tanks are ASTs.

SK Response: The above revisions have been made in the revised permit application.

- IX. While Personal Protective Equipment (PPE) is listed in a few areas of the application and on checklists as part of Safety & Security checks, the reviewer did not find mention of the level of PPE required for workers as well as visitors/inspectors for the various areas of the facility. Please clarify where this can be found or revise the application to include it.

SK Response: PPE requirements can be found in Part I, page 11, of the revised application.

Specific Permit Application Comments and Deficiencies

I. Part I.A. – General, Application for a Hazardous Waste Permit

- a. The Part A information is incomplete. Revise the application to include complete Part A, EPA Form 8700-12, 8700-13, 8700-23. (40 CFR 270.13)
- b. Page 1 of 4, #3: Revision number should be the number of the revision and not the date of the application. Please correct accordingly.
 - i. *Revision received on October 9, 2019.*
- c. Page 4 of 4, #3.b: Please add a reference in the Process Table: "See Attached in Table Part ID.3".
 - i. *Revisions received on October 9, 2019.*

SK Response: The revised application includes complete Part A information, and a 8700-12FL-Florida Notification of Regulated Waste Activities. Form 8700-13 appears to be the form for biennial reporting, which Safety-Kleen is required to submit, though does not believe as part of an operating permit renewal. Form 8700-23 appears to be the same or similar to the FDEP Form 62-730.900(2)(a), which is being submitted as part of this revised application. Would the Department also like Safety-Kleen to submit EPA Form 8700-23?

II. Part I.B. – Site Information

- a. Page 2: Change "not" to "no" under Run-Off Control System paragraph.
- b. Figure 2.2-2: Remove the pattern/shading superimposed on the Site Location so that is clearly understood that the referenced site does not fall within either the 100 or the 500-year flood zones.
- c. Figure 2.2-5: Title should be "Facility Layout & Location of Hazardous Waste Management Units".

SK Response: The above revisions have been made as part of the revised permit application.

III. Part I.D. – Operating Information

- a. Part I.D.2: DESCRIPTION OF FACILITY OPERATION
 - i. Page 3, 4th Paragraph: After the first sentence under "10-Day Transfer Storage Area (FRS)", add something like "Temporary overflow is also located within the CSA. Signage clearly marks these areas."
- b. Part I.D.3: Table: Process – Codes and Design Capacities
 - ii. We noted that waste codes F001 and F004 were listed on the facility's form 8700-12 but were missing throughout the text and tables in this application. After discussion, it was deemed that these codes would be added to the Fluid Recovery Service (FRS) waste stream within this table, indicating that the Facility only receives these wastes for transfer within the 10-day Transfer Waste Areas.
 1. *Revision received on October 9, 2019.*

SK Response: The above revisions have been made to the revised application.

IV. Part II.A. - General

- a. Page 1, 3rd Paragraph: Remove parentheses surrounding "Bradford".
- b. Figure 2.2-2: Remove the pattern/shading superimposed on the outlined Site Location so that it is clearly understood that the referenced site does not fall within either the 100 or the 500-year flood zones.

SK Response: The above changes have been made in the revised application.

V. Part II.A. – Preparedness, Prevention Plan and Contingency Plan

a. Emergency Coordinator & Notification Phone Numbers.

- i. Both the Primary and Alternate Emergency Coordinators have recently changed at the Tallahassee Branch, so the following edits are required:
 1. Add new names, cell phone number and direct office line phone numbers for each coordinator.
 2. Add home addresses for each coordinator.
 3. The DEP NWD, OER and State Watch phone numbers have changed, please update.
 4. The phone number for Tallahassee Memorial Medical Center has changed, please update.
 5. Add in emergency contact information for the Poison Control Center for mercury spills or accidents/ingestion.

SK Response: The above changes have been made to the revised application.

ii. Contingency Plan Quick Reference Guide (Table)

1. Make the same Branch Emergency Coordinator edits as referenced above.
2. Add in the F001 and F004 wastes to this table under the “Transfer Waste Storage Area” under the column “Location Accumulated”.
 - a. In the “Location Accumulated” cell, refer to the AST as “Permitted Hazardous Waste Tank....”
3. Please explain why “F” waste codes would not be included in the 15,000-gallon Used/Spent Solvent AST.
4. The figure “Quick Reference Guide Site Layout” inserted at the back of this section does not show all hazardous waste locations of areas described in the Contingency Plan Quick Reference Guide Table. Please replace with appropriate figure.

SK Response: The above changes have been made to the revised application. #3 – the used parts washer solvent (product Safety-Kleen 150 Premium Solvent) does not meet the definition of any F-listed waste. This is the only material stored in the 15,000 RCRA-Permitted Hazardous Waste Tank (Used Solvent). Safety-Kleen does not allow any customer to mix F-listed solvents in their parts washers.

- iii. If Safety-Kleen is aware of any additional waste codes not previously reported or included in this application, they should be added into the applicable text, figures and tables within this application.
- iv. Please make consistent the description of the “Spent Parts Washer Solvent/Used Solvent” AST in this table and throughout the application.

SK Response: Safety-Kleen is not aware of any additional waste codes not previously reported or included in the application. The description of the AST has been made consistent throughout the revised application (RCRA-Permitted Hazardous Waste Tank (Used Solvent)).

b. Page 10 – EMERGENCY NOTIFICATION

- i. 1st Paragraph, 2nd Sentence: Add in “and home addresses” following “and cell phone numbers”.
- ii. Page 12, 3rd Paragraph: Check all emergency numbers listed in the text against those revised on the Quick Reference Guide.

SK Response: The home addresses have been added in the revised application, and all emergency numbers have been checked against the QRG.

c. Page 14 – POTENTIAL SPILL SOURCES

- i. Rephrase “for a small scale (less than 55-gallons of waste) pollution incident to read: “for a spill equal to or less than 55-gallons of waste”. The Department does not agree with this definition of a “small scale” spill.
 1. Page 16 – Spill Control Procedures
 - a. #3. Check that all emergency contact numbers match the Quick Reference Guide.

SK Response: The above changes have been made in the revised application.

d. Page 27 – ARRANGEMENTS WITH LOCAL AUTHORITIES

- i. Please submit copies of signed and returned letters sent by the Tallahassee Branch to local emergency responders/authorities notifying them of this facility’s PPP/CP.
 - ii. In the text under this section, clarify how often the letters and copies of the PPP/CP are sent to local emergency responders/authorities in order to make the required arrangements for familiarization.
 - iii. Is there a follow-up protocol if no response has been received by the Branch?
- e. Table 5.1-1: Permitted and Transfer Wastes
- i. Similar comment as above regarding “F” waste codes.
- f. Tables 5.6-1 & 5.8-1: Emergency Response Equipment
- i. Is there also a need or requirement for Spill Kits, e.g., mercury spills?

SK Response: Copies of signed and returned letters sent by the Tallahassee Branch to local authorities will be forwarded to the Department once the PPP/CP has been approved in the application process and the revised plan has been submitted to those agencies. Normally, letters and copies of revised pages of

the plan are sent out to local authorities as revisions are made, such as a change in emergency coordinator. When the PPP/CP is undergoing revision during permit renewal (every 5 years) a full copy is sent to local authorities. A mercury spill kit has been ordered for the Tallahassee branch to include in its' emergency equipment area. Other spill absorbent material (petroleum/oil & other) is located at the branch.

VI. Part II.A. – Training

- a. Page 28, 3rd Paragraph : Clarify that all employees are properly trained to handle and/or manage hazardous wastes and hazardous waste operations and be able to effectively respond to emergencies within 6 months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later, in accordance with 264.16(b).
- b. Page 31, 3rd Paragraph: Please specifically include "HAZWOPER 8-hr Annual Refresher Course" in this paragraph as cited in 264.16(c).
- c. Page 33, 2nd Paragraph: Please specifically include "HAZWOPER 8-hr Annual Refresher Course" in this paragraph as cited in 264.16(c).
- d. Table 6.1-10: Continuing Training Topics for Branch Employees
 - i. Please specifically include "HAZWOPER 8-hr Annual Refresher Course" in this paragraph as cited in 264.16(c).
 - ii. If applicable, please also include the HAZMAT refresher course.

SK Response: The above changes have been made in the revise application.

VII. Part II.A. – Waste Analysis Plan (WAP)

- a. The WAP section included is generally inadequate to demonstrate compliance required by 40 CFR 270.14(b). The Department recommends revisions to include chemical and physical analysis and a waste analysis plan.

SK Response: The revised application is formatted to include Part II.A.5 – Waste Characteristics and a separate tab Part II Waste Analysis Plan (WAP) for the Department's review.

- b. Page 1: Waste Characteristics
 - i. Same comments apply regarding "F" waste codes in the table titled "Permitted/Site Generated Waste Streams".
- c. Page 2: Chemical and Physical Analysis
 - i. Paragraph 3, #1, 3rd Sentence: Remove "Sanford" and replace with "Tallahassee" facility.
- d. Page 3, #4: The last sentence is missing a 'period'.
- e. Page 3: *Wastes Resulting from the Dry Cleaner Service*
 - i. Please add in a line after the first paragraph.

- f. Page 5, 1st Paragraph: Please clarify further the process of receipt of the paint wastes by the Tallahassee Branch and the sending off to another permitted facility or for disposal.
- g. Page 5, 2nd Paragraph: Please clarify the location of the “retain” samples collected from used oil operations and where they are contained after initial collection. For example, are they held within cabinets or on shelves before being placed inside of 55-gallon drums? Are they then sent off to another Safety-Kleen facility?
- h. Page 5, 3rd Paragraph: Specify the waste codes pertaining to spent aerosol cans in the final sentence “Waste codes for this material are D001 and D035”.
- i. Page 6, 3rd bullet point under “Fluid Recovery Services (FRS) 10-Day Transfer Wastes”
 - i. Add in the chemicals that describe F004.
 - 1. *Revision received on October 9, 2019.*
- j. Page 7: Add in a line between the 1st and 2nd Paragraphs.
- k. Page 7, “Waste Compatibility with Tank System”
 - i. Rephrase the first sentence to read: “The only hazardous waste stored in one of the three ASTs within the Storage Tank Unit is the (Used/Spent Solvent, use consistent description).”
- l. Page 8: In the 1st sentence, replace “Sanford” with “Tallahassee”.
- m. Page 10, 2nd Paragraph, 4th sentence: Complete the sentence “In the case (missing words) parts washer....”
- n. Page 13: Additional Requirements for Ignitable, Reactive or Incompatible Wastes
 - i. Paragraph 3, 1st Sentence: Please rephrase. The Tallahassee Branch does not operate any “permitted storage warehouses”. To clarify, the CSA is permitted and is located inside of a larger warehouse.
 - ii. Paragraph 3, 1st Sentence: Please rephrase to: “The only permitted hazardous waste containers opened at the facility are the Used Parts Washer Solvent/Used/Spent Solvent wastes which are eventually consolidated into the 15,000-gallon Used/Spent Solvent AST within the Tank Storage Unit.”
 - 1. Please further clarify whether or not the waste within this AST is considered “ignitable”.

SK Response: The above changes have been made in the revised application.

VIII. Part II.B. – CONTAINER STORAGE

- a. Page 1: Please revise the 1st Sentence to read: “The Container Storage Area (CSA) is....”.
- b. Page 1: CONTAINMENT SYSTEM/UNIT

- i. The calculation of the secondary containment for the containers in the warehouse is not detailed enough to determine the adequacy for the volumes listed (40 CFR 270.15). Please recalculate and present the findings in the revised application.

SK Response: The revised application includes the changes above, and there is a revised calculation for the secondary containment system in the warehouse included in this revised application.

- 18. Part II.P:** The list of Solid Waste Management Units does not include the battery storage area. If this area is not within an existing SWMU, it should be identified as a new SWMU using a SWMU Profile Sheet (one can be sent to you). If the battery storage area is within an existing SWMU, the description in this section (Part II.P) should be updated to include the battery storage area.

SK Response: The battery storage area is included in SWMU-12 with the mercury bulb/devices storage area. Part II.P.2 has been revised to include batteries, and is included with this response.

IX. Part II.C. – TANK STORAGE

a. Page 1: Tank System Specifications

- i. Please provide information pertaining to the age of all ASTs (264.19(b)(4)) and where they are physically located onsite, e.g., direction from the Tank Storage Unit (remove 'farm) for those not included within.
- ii. Describe separately the three (3) 15,000-gallon ASTs located within the Tank Storage Unit, and where they are located proximal to each other.
- iii. Change the second-to-last sentence in this paragraph to read: "Of the three ASTs located within the Tank Storage Unit, the only hazardous waste permitted AST is the Used/Spent Solvent/Parts Washer (or whichever description you deem) AST. The two Used Oil 15,000-gallon ASTs, while not RCRA regulated, are registered under the Facility ID No.: FLD982133159."

SK Response: The above information has been added to the revised permit application.

X. Part II.P.#2 – SOLID WASTE MANAGEMENT UNITS

- a. Revise the description of SWMU-4 as the 15,000-gallon Hazardous Waste Used/Spent Solvent AST and not the "150 Solvent Tank".

SK Response: SWMU-4 description has been changed to RCRA-Permitted Hazardous Waste Tank (Used Solvent) and is included in this revised application.

XI. Part II.Q. – SOLID WASTE MANAGEMENT UNITS

- a. Page 1, 2nd Paragraph: Please revise this paragraph to read: “The current permit, 009207-010-HO, lists thirteen (13) SWMUs for the “Tallahassee Branch SWMU-13 is subdivided into 13A, 13B, and 13C”.
- b. Page 2: Table of SWMUs:
 - i. Revise the description of SWMU-4 for consistency – currently it reads “Spent Mineral Spirits Tank (Inside SWMU-2).
 - ii. Clarify and edit as necessary the description of SWMU-7 and SWMU-8 locations regarding the location of SWMU-1.
- c. Figure Part II-Q:
 - i. Clarify the SWMU-1 boundary and whether SWMU-7 and SWMU-8 fall within SWMU-1. If so, please change the configuration/outline of SWMU-1 on Figure Part II.Q.
 - ii. Also, change the description for SWMU-4 in the SWMU Legend at the bottom left of the figure.

SK Response: The changes above have been made and are included in the revised permit application.

XII. Part II.S. – AIR EMISSION STANDARDS

- a. Please see comments provided for Subparts BB and CC in XV Appendix C below.
- b. Table 11.2-2: Summary of Container Management Units Subjected to Subpart CC
 - i. Please add in “F” waste codes as applicable to the CSA and note whether they are part of the 10-Day Transfer containers or the 90-day storage containers.

XIII. Appendix A: Site Photographs

- a. Please include photographs of all SWMUs using consistent descriptions as within the text and figures in the application.
 - i. For the photograph captions, please include also the individual SWMU #'s that pertain to that photograph.
- b. Also include inside photographs of the Tank Storage Unit so that all three (3) 15,000-gallon ASTs are shown.

SK Response: Photographs with the above changes are included in the revised application.

XIV. Appendix B: Chemical Analysis Reports, Annual Re-Characterization

- a. It is also noted that there are no exceedances in the confirmatory analytical data for applicable constituents as part of waste streams handled by the Tallahassee Branch.

- i. Please explain the protocol undertaken should any constituents handled by Tallahassee Branch show exceedances of the reporting limit for any waste stream specific constituent.
- ii. Update the explanation of this national sampling process in the text within the application where applicable.

SK Response: Safety-Kleen permitted waste streams are sampled and analyzed annually as part of the Annual Recharacterization Program (AR). Analytical data is then subjected to an EPA SW-846 approved statistical model, which is discussed in the facility WAP. Any samples submitted by the SK Tallahassee facility as part of the AR showing exceedances of the reporting limit would be used in the statistical analysis for determining waste codes of SK core/permitted waste streams. In addition, if a container with questionable contents, use parts washer solvent, is returned to the facility, a sample will be taken and analysis performed. The container will be held at the facility pending completion of analysis. If the analysis indicates the waste to be different than what was manifested to the facility, it will be returned to the generator on appropriate shipping document, or managed at the facility in accordance with the generator's direction. Records of all sampled and/or rejected wastes will be kept on file at the branch.

An explanation of the national sampling process is updated in Part II.A.5, and in more detail in Part II Waste Analysis Plan (WAP).

XV. Appendix C: Subpart BB/CC Information

- b. Subparts BB and CC information is attached to the end of the application and does not provide required information for equipment and HWMUs.
- c. In general, the written Leak Detection and Repair (LDAR) Program requires greater detail to demonstrate compliance with RCRA Subparts BB and CC. (40 CFR 270.25, 270.27, 270.15, 170.16 and Part 264 Subparts BB and CC).
 - i. The information is vague on how SK implements the procedures and who implements the LDAR Program.
 - ii. The inspection and monitoring forms must be detailed and described to demonstrate compliance with the LDAR Program.
 - iii. The equipment lists must be provided indicating all equipment subject to Subpart BB, the equipment type, leak detection, monitor measurement for each interface of the equipment and corrective action taken if emissions exceed definition on the inspection and monitoring forms.
 - iv. The inspection and monitoring forms must list the individual leak definitions pertaining to specific equipment parts that are being inspected and/or monitored to prevent and control emissions.
 - v. While these forms do not include 'equipment' specifically, each piece must be listed on the table to prevent omissions.

Ms. Carrie L. Kruchell
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SK Response: Subpart BB and CC information has been revised and is found in Part II.S of the application.

Revised hard copies of the permit renewal application are being sent to the Department's office in Tallahassee and to the FDEP Northwest District office. If you have any questions regarding this submittal please contact me at (561) 523-4719.

Best regards,

A handwritten signature in black ink, appearing to read 'Jeff Curtis', with a long horizontal line extending to the right.

Jeff Curtis
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