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February 9, 2021

DRAFT

Ms. Carrie L. Kruchell, P.G.
Professional Geologist II
Hazardous Waste Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. #4560
Tallahassee, FL 32399-2400

**RE: Permit/Transfer Facility Authorization Modification, Safety-Kleen Systems, Inc.,
161 Industrial Loop South, Orange Park FL, FLD980847214, Operating Permit No.
0077130-HO-010.**

Dear Ms. Kruchell:

Please find the enclosed information AS a formal request to the Department for a Permit/Transfer Facility Authorization Modification. A summary of the Permit/Transfer Facility Authorization Modification request follows.

I Summary of the Permit/Transfer Facility Authorization Modification Request

The Safety-Kleen Systems, Inc. (Safety-Kleen) Orange Park facility is requesting to add an additional transfer storage area for waste pharmaceutical materials.

These materials will be stored on a transfer basis inside an existing fenced in area within the warehouse (secure cage). The secure cage is approximately 35' x 30', includes one gate/door for entry/exit, and is depicted on the revised Figure 2.1-1 (Attachment A – Facility Map). One row will be used inside this secure cage for transfer storage of these materials, which is also depicted on Figure 2.1-1. Pharmaceutical waste materials will be shipped, and in-transit, to the Safety-Kleen Orange Park facility on U.S. hazardous waste manifests or Bill of Ladings (BOLs) depending on whether or not the material(s) are being managed as hazardous waste or not. Safety-Kleen Orange Park will not be the designated facility for these shipments, as they will only be moving through the facility as transfer waste(s). All pharmaceutical materials will be transported in USDOT approved containers. These containers will be sealed/secured and not opened while in transit through the Safety-Kleen Orange Park facility. The secure cage will be outfitted with an alarm system that is monitored 24 hours a day by a 3rd party vendor (ADP). Entry to this area will be restricted to key facility personnel.

II. Modifications

A. Part I D.2 page 3, Part II A.5 page 6, Part II B page 2, Part II P.2 page 2, Part II Q.

References to pharmaceutical waste material were added.

B. Figures

Revised Figures: Part II Q, and Figure 2.1-1

IV. Fee Payment

Payment of the required permit/transfer facility authorization modification fee of ?????

Thank you for your assistance and guidance. If you have any questions or need additional information, please contact me at (561) 523-4719, or jeff.curtis@safety-kleen.com.

Sincerely,

Jeff Curtis
Sr. Environmental Compliance Manager
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, FL 33426

Safety-Kleen provides a dry cleaning waste reclamation service where containers of dry cleaning wastes are collected and stored temporarily at the Branch before shipment to the TSDF centers for reclamation and processing. All dry cleaning wastes remain in their original containers while at the Orange Park facility.

Safety-Kleen also provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and stored temporarily at the Branch before shipment to the TSDF centers for reclamation and processing. Paint wastes may be managed as permitted. Or transfer wastes. All paint wastes remain in their original containers while at the Orange Park facility.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch. Under this program, other types of waste are collected by the Branch and sent to the Safety-Kleen/Clean Harbors TSDF's. The FRS wastes (if hazardous) are managed as 10-Day transfer wastes. Examples of the types of wastes that may be received from FRS customers include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naptha, etc.
- Lubricating oils, hydraulic oils, synthetic oils, and machine oils.
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane.
- Photographic and x-ray related wastes.
- Paint and lacquer thinners.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.
- Pharmaceutical waste materials

10-Day Transfer Storage Area (FRS)

The 10-day transfer storage area is located in southern portion of the main warehouse, along the eastern side of the permitted container storage area, and the southeastern return/fill dock. Signage clearly marks these areas. All hazardous waste containers stored in the 10-day transfer area are manifested and in transit to other permitted facilities. Safety-Kleen Orange Park is not the designated facility for wastes stored in the 10-day transfer area.

Aqueous Brake Cleaner

The Aqueous Brake Cleaner (ABC) is an aqueous, alkaline concentrated cleaner diluted with water (4¾ gallons of water is mixed with ¼-gallon of concentrated aqueous cleaner). The ABC parts cleaner has a 5-gallon reservoir under the cleaning vat that provides the aqueous solution for cleaning. The spent ABC is transported from the customers in 5-gallon suitcase type containers. Spent aqueous brake cleaner that is non-hazardous is sent to a waste water treatment facility for processing. If a customer (generator) assigns any hazardous waste code to the spent ABC, the material is managed as a 10-day transfer waste and sent to an appropriate Safety-Kleen/Clean Harbors TSDF for processing.

Fluid Recovery Services (FRS) 10-Day Transfer Wastes

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Branch to collect and transfer various other hazardous wastes to the appropriate Safety-Kleen/Clean Harbors TSDF's for processing. Non-hazardous Containerized Waste Services (CWS) are also performed under this program. FRS wastes that are RCRA hazardous wastes are managed as 10-day transfer wastes. Examples of types of wastes that may be received under this program include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum-naptha, etc.;
- Lubricating oils, hydraulic oils, synthetic oils, and machine oils;
- Industrial halogenated solvents such as 1,1,1-trichloroethane, tetrachloroethylene, Freon, and trichloroethane;
- Photographic and x-ray related wastes;
- Paint and lacquer thinners;
- Acids;
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.
- Pharmaceutical waste materials

the maximum actual capacity is less: 4,800 gallons, assuming 30-gallon drums stacked two high. Materials allowed for storage include virgin flammable and flammable paint-related wastes. The types and numbers may vary; however, the storage capacity will not be exceeded. Containment volume calculations and layout of the containers are provided in Figure 8-2.

FRS Waste and Transfer Wastes

Transfer wastes may be stored in the southern portion of the warehouse, eastern side adjacent to the permitted container storage area, and a portion of the Return/Fill area (Figure 8.1-3). Pharmaceutical transfer waste materials may only be stored inside the secure cage as noted on Figure 2.1-1. Since FRS wastes are transfer wastes only, they are not required to have containment. Allied products may also be stored in the transfer waste area as shown in Figure 8.1-2.

The containment system in the permitted container storage area is free of cracks and is sealed with Stonclad GS and a top coat of Stonkote HT4, products of The Stonhard Group. This coating material is sufficiently impervious to prevent seepage into and through the concrete. The flooring beneath the paint waste shelter, which has a metal floor and metal containment pans, is also concrete. Metal pans and flooring are fully compatible with the waste stored in the Paint Waste Shelter. Studies performed with the Canadian Portland Cement Association revealed that the average permeability of concrete is .000000001 cm/s, which should prevent infiltration should a release occur from the metal pan/floor containment system. The warehouse and paint shelter are completely enclosed to prevent precipitation from entering.

Spills from containers are removed by a hand-held, portable electric pump (the COMS pump), wet-dry vacuum, or sorbent materials. Since the characteristics of the stored wastes are known, no analyses are performed for the materials collected from the containment area. All collected materials are sent to a RCRA permitted recycling/reclamation facility.

SWMU-9 (Pallet Accumulation Area) is located on the south side of the Return/Fill area in a small alley way in between the R/F and Paint Waste Shelter

SWMU-10 (BFI Dumpster) is a municipal dumpster located on the south side of the concrete loading dock-which is located on the west side of the facility.

SWMU-11 (Above Ground Storage Tank Farm) is located in the northwest corner of the facility. It houses one 15,000 gallon Used Oil tank, one 15,000 gallon used antifreeze tank, and one 15,000 hazardous waste solvent tank.

SWMU-12 (10-Day Transfer Waste Area) is located on the southeast dock of the return/fill area, along the east and south border of the container storage (S01), the south/southwest portion of the warehouse, and along the middle of the warehouse building. These areas are depicted on Figure Part II-Q.

SWMU-13(Mercury Lamps Storage Area (Inside SWMU-1)) is located in the northwest corner of SWMU-1.

SWMU-14 (Used Antifreeze Tank (Inside SWMU-5)) was a 6,000 gallon tank located in the southwest bay of the Return/Fill Area. This tank was removed in approximately September 2016.

SWMU-15 (Satellite Container (Inside SWMU-5)) is two 55-gallon containers near the wet dumpster in the Return/Fill Area.

SWMU-16 (Pharmaceutical Waste Transfer Area) is located in the southeastern portion of the warehouse (inside secure cage). This transfer area is expected to be active sometime in May/June 2021. Safety-Kleen will notify the Department of the exact date before beginning to use this area.

Part II

Q. INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS

Part II.Q. of the Florida Department of Environmental Protection's (FDEP's) Application for a Hazardous Waste Permit outlines the information requirements for solid waste management units (SWMU's) at the facility. This section provides the required information.

Ten solid waste management units have been identified at the facility in the RCRA Facility Assessment Report of October 1991. Five additional units have been identified in this permit renewal application (Note: SWMU-8 consists of four loading/unloading areas across the facility and are identified as SWMU-8a, 8b, 8c, & 8d). SWMU-16 (Pharmaceutical Waste Transfer Area) is being added as part of a Permit/Transfer Facility Authorization Modification in February 2021. The complete list of SWMU's is found on the next page.

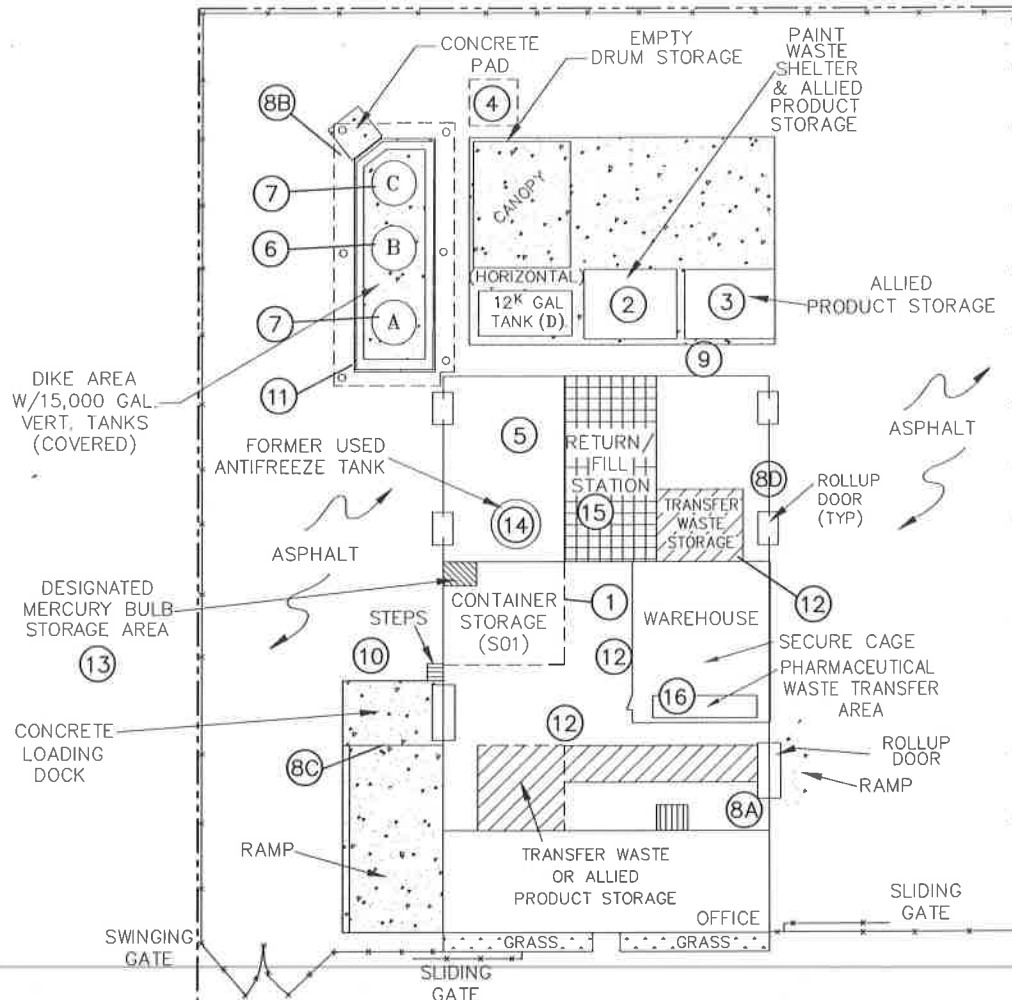
SWMU NUMBER	DESCRIPTION
1	Warehouse Container Storage Area
2	Paint Waste Building
3	Old FRS Waste Building (Now Allied Product Storage)
4	Former Restaurant Filter Building
5	Return and Fill Area
6	Spent Mineral Spirits Tank
7	Used Oil Tank/Used Antifreeze Tanks
8	Loading/Unloading Areas
8A	Inside Warehouse
8B	Tank Farm Area
8C	Warehouse Dock
8D	Return/Fill Dock
9	Pallet Accumulation Area
10	BFI Dumpster
11	Above Ground Storage Tank Farm
12	10-Day Transfer Waste Area
13	Mercury Lamps Storage Area (Inside SWMU-1)
14	Used Antifreeze Tank (Inside SWMU-5). This tank was removed in September 2016.
15	Satellite Container (Inside SWMU-5)
16	Pharmaceutical Waste Transfer Area

FIGURE PART II - Q

LOCATIONS OF SOLID WASTE MANAGEMENT UNITS (SWMU)

SAFETY-KLEEN SYSTEMS, INC. FACILITY

ORANGE PARK, FLORIDA



SWMU #	DESCRIPTION
1	WAREHOUSE CONTAINER STORAGE AREA
2	PAINT WASTE BUILDING
3	FRS WASTE BUILDING
4	FORMER RESTAURANT FILTER BUILDING
5	RETURN AND FILL AREA
6	SPENT MINERAL SPIRITS TANK
7	USED OIL AND USED ANTIFREEZE TANKS
8	LOADING/UNLOADING AREAS
8A	INSIDE WAREHOUSE
8B	TANK FARM AREA
8C	WAREHOUSE DOCK
8D	RETURN/FILL DOCK
9	PALLET ACCUMULATION AREA
10	BFI DUMPSTER
11	ABOVE GROUND STORAGE TANK FARM
12	10-DAY TRANSFER WASTE AREA
13	MERCURY LAMPS STORAGE AREA (INSIDE SWMU-1)
14	USED ANTIFREEZE TANK (INSIDE SWMU-5) REMOVED SEPTEMBER 2016
15	SATELLITE CONTAINER AREA (INSIDE SWMU-5)
16	PHARMACEUTICAL WASTE TRANSFER AREA

WATER METER

INDUSTRIAL LOOP ROAD SOUTH

LEGEND

--- PROPERTY BOUNDARY

--- FENCE

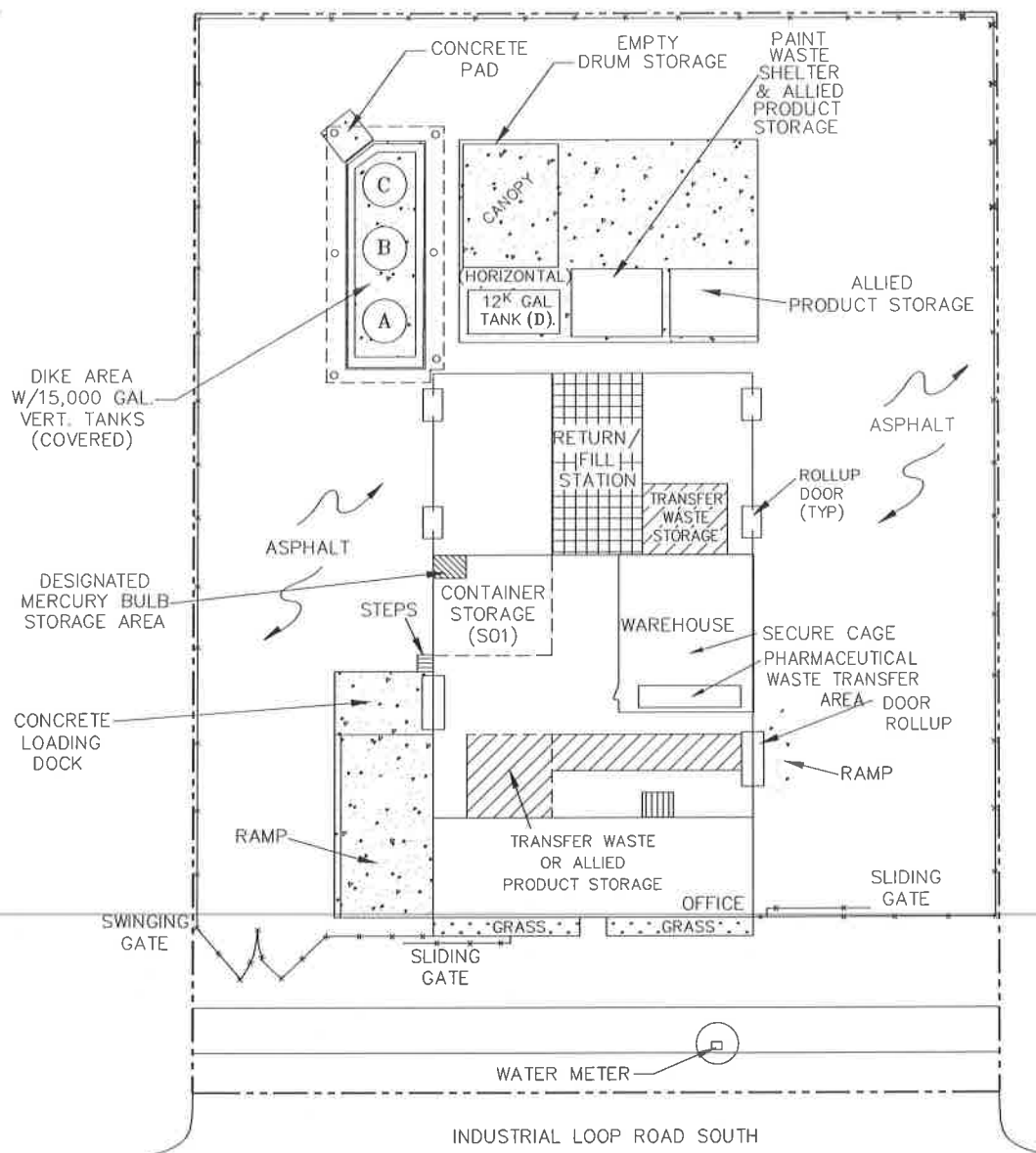
--- UTILITY EASEMENT

--- CONCRETE



ERM.

**FIGURE 2.1-1
SITE LAYOUT
SAFETY-KLEEN SYSTEMS, INC. FACILITY
ORANGE PARK, FLORIDA**

**LEGEND**

- PROPERTY BOUNDARY
- *- FENCE
- UTILITY EASEMENT
- CONCRETE

TANK CONTENTS

- (A) USED ANTIFREEZE
- (B) WASTE SOLVENT
- (C) USED OIL
- (D) VIRGIN SOLVENT

**ERM.**