

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Wednesday, March 28, 2012 10:05 AM
To: Kothur, Bheem
Cc: Thursby, Kim
Subject: Re: Safety-Kleen, Inc.-Ocala;FLR 000 060 301;Notice of Deficiency

Received. Thank you.

From: Kothur, Bheem [<mailto:Bheem.Kothur@dep.state.fl.us>]
Sent: Wednesday, March 28, 2012 07:03 AM
To: Curtis, Jeff
Cc: Thursby, Kim <Kim.Thursby@dep.state.fl.us>
Subject: FW: Safety-Kleen, Inc.-Ocala;FLR 000 060 301;Notice of Deficiency

Hi Jeff,
Please respond to this e-post that you have received the attached documents.
Thanks.

Bheem

From: Epost HWRS
Sent: Thursday, March 22, 2012 1:29 PM
To: Jeff.Curtis@Safety-Kleen.com
Cc: Bahr, Tim; Coates, John; Kraemer, Janine; White, John; Wick, Fred; Holmes, Georgiana; Hornbrook, Frank; dbarcenas@ectinc.com; Kothur, Bheem; Tripp, Anthony
Subject: Safety-Kleen, Inc.-Ocala;FLR 000 060 301;Notice of Deficiency

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

March 22, 2012

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

SENT VIA E-MAIL

Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis, EHS Manager
Safety-Kleen Systems, Inc.
359 Cypress Road
Ocala, Florida 34472

RE: Safety-Kleen, Inc.
EPA I.D. No. FLR 000 060 301
Permit Numbers: 00161967-HO-006; 00161967-SO-007
Used Oil and Material Processing Facility Renewal Permit
Notice of Deficiency

Dear Mr. Curtis:

The Florida Department of Environmental Protection (the Department) has reviewed your permit renewal application dated February 3, 2012 and received on February 21, 2012 to operate a Used Oil Processing facility in Ocala, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Mr. Jeff Curtis, EHS Manager

March 22, 2012

Page Two

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit two copies of your written response (one hard copy and one electronic copy for Oculus to the Tallahassee, and one hard copy to the Central District Office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III

Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: Janine Kraemer, FDEP/Central District, janine.kraemer@dep.state.fl.us
John White, FDEP/Central District, john.white@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Georgiana, Holmes, OGC/Tallahassee, Georgiana.holmes@dep.state.fl.us
Frank Hornbrook, DEP/Tallahassee, frank.hornbrook@dep.state.fl.us
Dean M. Barcnas, ECT/Tampa, dbarcnas@ectinc.com

ENCLOSURE

Safety-Kleen Systems, Inc.

Used Oil Facility Operating Permit No: 161967-HO-004

First Notice of Deficiencies

March 22, 2012

SEPCIFIC COMMENTS: Application Form for a Used Oil Processing Facility Permit; and Application Form for a Waste Processing Facility.

1. Part I.A.3, Note, Page 8: The Application Form for a Used Oil Processing Facility Permit and approved Form 8700-12FL-Florida Notification of Regulated Waste Activities do not match. Please review and be consistent and revise as appropriate.
2. Part I.A.9, and Page 8: The contact person telephone number is incorrect. Please verify and revise as appropriate.
3. Part I.B.1, Page 9: Please review the degree symbols for latitude and longitude and revise as appropriate.
4. Part I.C.1, Page 10: If the facility continues to dispose of the samples as Hazardous Waste, which is referenced later on in this application, the facility will be at least a small quantity generator (SQG), and possibly a large quantity generator (LQG). This would require an updated notification for your generator status and possible changes to your operating conditions.
5. Attachment A, Description Of Facility Operations, First Paragraph: The facility's last inspection report indicates that there are 33 tanks of which there are 25 used oil tanks with a total capacity of 880,000 gallons. Also, there are three (3) rail cars with 25,000 gallons capacity. Please review this paragraph and revise as appropriate.
6. Attachment B, Figure 1, Site Plot Plan: This Figure should show the Tank numbers. Please review and revise as appropriate. Also, identify the Warehouse Area.
7. Attachment B, Facility Detail Process Description, Second Paragraph, Item 4, Page B-2: Please provide a description of the types of solid waste received at the facility and a process description for all solid waste activities performed at the site. Also, provide the information required in Form 62-701.900(4) part B for the solid waste operations.
8. Attachment B, Tank Farm Storage Area, Page B-4, and Paragraphs 2, 3, 4; and Receiving and Processing Area, Paragraphs 4, 5, and Page B-6; and Attachment F, Figure-2, Site Plan; Table3-1. Oil Storage, Pages 3-6 and 3-7:

The description in these paragraphs, tank numbers and contents in the tank are confusing and do not agree. Please be consistent and revise as appropriate.

9. Attachment B, Facility Detail Process Description, Solid Waste Management Area (SWMA), Second Paragraph, Page B-5: Please provide copies of the latest permits to demonstrate that the facility has the most recent permits.
10. Attachment B, Facility detail Process Description, Solid Waste Generated Offsite, Page B-9: Please provide an operation plan for the solid waste processing. Also, this paragraph is very vague as to what the facility will be processing. Please expand the paragraph to include what specific materials are brought from off site and what specific materials are generating on site on a weekly, monthly, or yearly basis? Be specific. What is the expected maximum storage of solid wastes at any one time and what is the maximum time the solid wastes will be stored prior to shipment for disposal or treatment?
11. Attachment C: The Attachment should show "Used Oil Incoming and Outgoing Shipments" instead of "Facility Analysis Plan". Please review and revise as appropriate.
12. Attachment C, Sampling Plan, Last Sentence, Page C-1: In a Response to a non-compliance letter dated January 5, 2011, it was indicated that they would be processed as used oil. Please explain in detail how these samples are to be disposed?
13. Attachment C, C. Solid Waste Received From Off Site, Page C-11, Fifth Line: "Performed before the effective date of RCRA regulation". Please review and delete this referenced RCRA regulation.
14. Attachment C: Facility should provide Flow Charts for field Screening Method, Laboratory Method, Used Oil Load Acceptance Procedure Post Certification, Ongoing Used Oil Marketing Analytical Procedure, Halogen Content 900-1000 ppm, and Halogen Content greater Than 1000 ppm. Please refer to previous application Attachment 3, C5a and Appendix A (Service Agreement), Appendix C (Flow Charts).
15. Attachment C-2, Oil and Antifreeze Collection Procedure: The document Pages 1 through 18 are identified as Proprietary and Confidential. To honor your request, please contact Georgiana Holmes/DEP OGC: Georgia.holmes@dep.state.fl.us or Please call at 850-245-2282.
16. Attachment C-2, Sample Management, Tenth Paragraph, Page 14 of 18: According to the last inspection report the department thought they were to be processed on-site instead of off-site. Please review and revise as appropriate.
17. Attachment E-3, Facility Used Oil Tracking Plan: Please provide Safety - Kleen Systems, Inc. Incoming Used Oil/Out-Going Used Oil Shipment Logs.
18. Attachment E-3, Facility Used Oil Tracking Plan; Attachment E-3, Waste Profiles: Attachment E-3 is missing in the application. Please review and resubmit as appropriate.
19. Attachment F, Section 4.0-Discharge Response: The Emergency Coordinators (ECs) identified in the Plan do not include the address and telephone number, both home and office. Emergency coordinators must live

close enough to the facility to respond in a timely fashion to an emergency. Please review and revise as appropriate. Also, please delete "FDEP District Warning Point" throughout the document.

20. Attachment F, Sub-Section 4.3.2.1, Federal Regulations, Page 4.5: Please correct the address of EPA Region 4 as "61 Forsyth Street, SW, Atlanta, Georgia 30303-3104" instead of "61 Forsyth Street, Atlanta, Georgia 303365".
21. Attachment F, Sub-Section 3.1, Detailed Summary, Page 3.1: Please review Latitude/Longitude and revise as appropriate and be consistent throughout the documents. Also, verify the Facility Phone number.
22. Attachment F, Sub-Section 4.3.1- Oral Notifications, Page 4-3: Please delete "FDEP District Warning Point" and phone number "(407) 893-3337" and replace with "State Warning Point" and the phone number "(800) 320-0519".
23. Attachment F, Appendix B, Discharge Report Form: Please review and revise FDEP Districts Office Addresses and phone numbers on this page.
24. Attachment G, Section 6-Emergency Procedures [40 CFR 279.52(b)(6)]: Please review Agency Contact Phone Numbers and revise as appropriate.
25. Attachment H, Ocala Tank Farm Storage Tank Contents and Capacities, Page H-2: Please review Tank Name/Capacity, and Contents and revise as appropriate. Also, Please see Attachment F, Table 3.1, Oil Storage, Page 3-6, Attachment I, Table I-1, Oil Storage, Page I-12 and be consistent. Tank Table should be revised to add another column to include the year that the tanks were installed.
26. Attachment I, Facility Closure Plan and Schedule, Table I-1, Oil storage, Page I.12: The facility must provide documentation of the last detailed tank inspections and certifications to the Department. Please explain in detail when were the latest thickness test performed and the latest tank system integrity assessment performed by a professional engineer registered in the state of Florida. Also, the facility must specify in the application the frequency of sludge removal from the tanks.
27. Attachment I, Facility Closure Plan and Schedule, Section 3- Closure Procedure: Please add a section for the closure of the solid waste processing area.
28. Attachment I, Section 4.6-Ground Water Sampling, Page I-11: It is not clear how many background wells and how many monitoring wells are to be installed? Please review the second sentence and revise as appropriate.
29. The facility has a total of 62 tanks with a total capacity of 931,582 gallons being used for used oil , pcw, solid waste, and antifreeze. The closure cost estimate must account for the disposal of the maximum capacity of the tanks. It appears that the submitted closure cost estimates is insufficient. Please review the estimate and resubmit.
30. Attachment I-1, Cost Estimate, Decontamination and Disposal, Page 2 of 3: The Quantities, and Unit Costs are very low for Decontamination, Waste Characterization and Disposal for all items listed in facility closure cost estimate. For example: Wash water disposal cost is estimated as \$ 0.12 per gallon instead of \$0.22 per gallon.

The estimated quantities should be the maximum tank capacity. For example (See #29): The storage capacity of PCW is 30,000 gallons instead it is listed as 11, 327 gallons only. The estimated quantities for wash water disposal is only 314, 090 gallons. These quantities should be at least 750,000 gallons. The estimated closure costs are too low. The revised estimate could be as high as \$550,000 instead \$367,748. Please review and revise as appropriate.

31. Attachment J, Employee Training: What type of spotter training is proposed for acceptance of solid wastes to identify, segregate, and properly manage prohibited or unauthorized solid wastes?

GENERAL COMMENTS:

1. Facility must submit a site map in pdf format (eight and a half by eleven inch), so that this map can be inserted into the permit.
2. Facility must submit a used oil tank table in pdf format (eight and a half by eleven inch), so that this can be easily inserted into the permit.
3. All Drawings: Source of these drawings stated that they were completed by "Engineering, Inc. 2007" (Site Plot Plan, Process Flow, Solid Waste Boundary, etc.) instead of "Environeering, Inc. 2007". Please review and revise as appropriate.
4. Figure 2, Site Plan: This figure is a new figure and produced by ECT, 2009. Please review the figure. The figure must be signed and sealed by a Florida Registered Professional Engineer.