

Thursby, Kim

From: Curtis, Jeff <Jeff.Curtis@safety-kleen.com>
Sent: Thursday, September 25, 2014 8:39 AM
To: Epost HWRS (Shared Mailbox)
Subject: RE: Safety-Kleen Tallahassee; FLD982133159; Request for Additional Information for Permit Application

Received.

Thank you,

Jeff Curtis EHS Manager | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.738.3026 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



Safety Starts With Me! Live it 3-6-5

From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Wednesday, September 24, 2014 1:43 PM
To: Curtis, Jeff
Cc: Bahr, Tim; Baker, Bryan; Russell, Merlin; Tripp, Anthony; Byer, James; 'bob.fox@erm.com'
Subject: Safety-Kleen Tallahassee; FLD982133159; Request for Additional Information for Permit Application

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

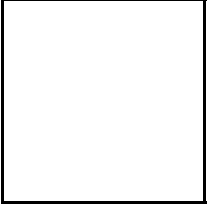
We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. 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, P.G.
Program Administrator
Permitting & Compliance Assistance Program
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us





**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

September 24, 2014

Sent Via E-mail

Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, Florida 33426

**Subject: Safety-Kleen Systems, Inc. FLD 982 133 159, Operating Permit No. 009207-HO-007
Leon County
First Notice of Deficiencies**

Dear Mr. Curtis:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-730.220 and Chapter 403.722, Florida Statutes (F.S.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or have any questions, please call me at 850-245-8796 or merlin.russell@dep.state.fl.us

Sincerely,

A handwritten signature in black ink, appearing to read "Merlin Russell".

Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Program & Permitting

MR/mdr

Enclosure

cc via e-mail w/enclosure:

Jim Byer, DEP, James.Byer@dep.state.fl.us

Robert W. Fox, ERM, bob.fox@erm.com

Enclosure
Safety-Kleen Systems, Inc. FLD 982 133 159
Operating Permit No. 009207-HO-007

General Comments:

1. In many cases, comments are not repeated although each needs to be addressed throughout the entire application. As an example, there are comments on water bodies discussed in Part 1, page 1, paragraph 3. This same paragraph is reiterated in Part II.A.1, paragraph 3 so the same changes need to be made to this section. There are also comments on identifying the container *storage* area that must be addressed in many figures.
2. Is the facility still involved with "Continued Use Program"? Figures 5.6-4 and 9.3-1 have a dumpster identified as "CONTINUED USE-VAT." If you are still using the CUP, include a brief section discussing the CUP. Part I.D.2, Description of Facility Operations would be a good place to insert this verbiage.

Specific Comments:

Tab Part 1

3. Part I.A.9: The contact's contact information are different than the 8700-12FL form. The application uses the Boynton Beach address and phone number but the 8700-12FL form uses the Tallahassee address and phone number. The 8700-12FL form should include the complete telephone number.
4. Part I.A.10: Similarly, the operator's contact information are different than the 8700-12FL form. The application uses the Texas address and phone number but the 8700-12FL form uses the Tallahassee address and phone number.
5. Part I.A.19: Complete the existing or pending environmental permits table.
6. Part 1, Page 1, paragraph 3 (and Part II.A.1, paragraph 3):
 1. Munson Slough is not identified on any figure.
 2. "Silver Lake Drain" is identified as a nearby water body on Table 2.2-1 (page 1 of 6). Silver Lake drain should also be identified on a figure.
7. Page 5, last paragraph: There is a reference to the Sanford facility.
8. Part I.D.3 (and Table 5.1-1): Two waste codes, F001 and F004, are not identified on your most-recent 8700-12FL form (signed March 5, 2014). If you intend to handle these wastes at the Tallahassee facility, then they need to be added to the 8700-12FL form. Otherwise, they should be removed from the application.

9. Figures 2.1-1, 2.2-5, 5.1-1, 5.1-2 and others: The old "Permitted Container Storage" area currently labeled and crosshatched as "FRS 10-DAY TRANSFER WASTE" should be labeled "FRS 10-DAY TRANSFER WASTE/PERMITTED CONTAINER STORAGE" and a different crosshatching utilized. The Closure Plan (page 2) identifies it as a 47' 7" x 78' 6" portion of the building but there is no figure showing its location. The only figure in this application showing the location of the container storage area is in the Part II.Q information (Figure Part II-Q).

10. Figure 2.1-1: Current labeled area of "BRANCH GENERATED/USED OIL FILTERS" should be labeled "USED OIL FILTERS" only.

11. Table 2.2-1: The original figure is probably in color. As black and white, the figure is of very limited use. If this "Table" is to be used, it should be submitted in color. Also, the abbreviations/acronyms in the legend should be spelled out.

12. Part I.D. Operating Information, 2. DESCRIPTION OF FACILITY OPERATION, page 3:

1. First paragraph, second sentence: Change "...may be managed as permitted or transfer wastes." to "... may be managed as permitted storage or transfer wastes."
2. Second paragraph, third sentence: Change "...may be managed as permitted storage or transfer wastes."

13. Part I.D. Operating Information, 2. DESCRIPTION OF FACILITY OPERATION, page 4, first paragraph: Delete/change "storage" from:

1. first sentence: "The 10-day transfer ~~storage~~ area is located..."
2. third sentence: "All hazardous waste containers ~~stored~~ located in the 10-day..."
3. last sentence: "... the designated facility for wastes ~~stored~~ located in the..."

14. **Tab Cont Plan (Contingency Plan)**

1. Page 5, second paragraph, third sentence change "... ~~will be stored~~ are located in the permitted container storage ~~area/transfer storage~~ or 10-day transfer area."
2. Page 5, second paragraph, last sentence add "Immersion cleaner wastes are normally received on manifests....."
3. Page 5, third paragraph, fourth sentence change "Dry cleaning wastes are ~~stored~~ located in the permitted container storage ~~area/transfer storage~~ or 10-day transfer area."
4. Page 5, third paragraph, last sentence add "Dry cleaning wastes are normally received on manifests....."
5. Page 6, second paragraph, second sentence change "... and are ~~stored~~ located in the permitted container storage ~~area/transfer storage~~ or 10-day transfer area."
6. Page 6, second paragraph, last sentence add "Paint wastes are normally received at the Branch on manifests....."
7. Page 6, third paragraph, second sentence change "...and may be ~~stored~~ located on site for up to 10 days."

8. Page 7, first paragraph: Verbiage is missing between “regarding” and before “handled.”
9. Page 7, INSPECTION PROCEDURES, second paragraph: Add in the first sentence, “The Branch Manager or designee, using the Weekly Inspection Log (Figure 5.2-1 or similar), is responsible...”
10. Page 8, after the bulleted item at top of page, add another bulleted item:
 - A weekly check of the condition and inventory of communication devices will be made. This includes telephones, intercom, and emergency alarm.
11. Page 8, fourth paragraph: Add in the sentence, “The Branch Manager or designee, using the Daily Inspection Log (Attachments A and C of Appendix D and Figure 8.4-1 or similar), is responsible...”
12. Page 8, Inspection of Security Equipment: It would be appropriate to mention here (or elsewhere, *and* on the inspection checklist) that warning signs be inspected for clarity (some tend to fade after extended exposure to the elements) and secureness. You probably already do this but it is not included.
13. Page 9, bottom of page, add a bullet which would account for “storage containers” located on trucks awaiting unload or departure because of 72-hr grace period.
14. Page 10, second paragraph: The second sentence refers to the emergency coordinators and contact information on page iii. There is no page iii. Presumably, there are pages “i” and “ii.” Neither are included.
15. Page 15, top of page, change address, “incident to the ~~Northeast~~ Northwest District of the FDEP, at 160 ~~Governmental Center~~ West Government Street, Suite 308, ...”
16. Page 15, last sentence: As written, the sentence could be interpreted that container lids are not secured before moving. You may wish to clarify or re-state this sentence.
17. Page 17, second paragraph, add to the sentence: “...exempts spills equal to or less than one pound” and that are immediately contained and cleaned up.
18. Page 19, last paragraph: This paragraph discusses “Hazardous Waste container storage.” However, the referenced figure showing the location of the storage (Figure 5.6-3) does not show or identify and storage areas. The figure only identifies 10-day transfer waste. The storage areas need to be added to the figure.
19. Page 20, last paragraph, first sentence: Change the sentence to “Transfer wastes will be ~~stored~~ located in the areas...”
20. Page 22, paragraph 2 (and Part II.C, page 2, paragraph 3): If rainwater is discharged to the ground, is it released through a drain in the secondary containment or pumped out? If a gravity-fed drain is present in the secondary containment, it should be identified on the figures. The soil at the drain location would be an area that will need to be sampled at closure. If a drain is present, this location must be added to the soil sampling locations in the closure plan, page 6, first bullet.
21. Page 28, 7th bullet: Spell out “BIDS.”
22. Page 31, Arrangements with Local Authorities: If arrangements with local authorities are refused, such documentation must be kept with your operating record.

23. FIGURE 5.2-1, near the top of the page: Days of the week (Monday through Friday) are not needed on a weekly inspection.
24. Table 5.2-1, page 1 of 2, second row of table (Safety Equipment): Add (under Specific Item) Communication; under Types of Problems, add: Disconnected/malfunctioning; and under Frequency of Inspection, add: Weekly.

Tab Training

15. Table 6.1-1 does not include any RCRA training such as container management, container and tank requirements, recordkeeping, reporting requirements, hazardous waste labelling, manifests, permit requirements, etc. Initial and annual hazardous waste training is required.

Tab WAP (Waste Analysis Plan)

16. General comment for waste streams associated/related with waste “solvent”. Because all of these waste streams are some form of solvent which has been used for its solvent properties (ability to mobilize/remove contaminants), would not one or more of the F001-005 waste code be applicable? If so, update of pages 1 through 4 as needed. Note the use of F-listed codes associated with site-generated liquid solid debris already.
17. Page 7, Mercury-containing Lamps and Devices & Batteries paragraphs: The second sentence should be more specific, and we suggest using “All mercury-containing lamps and devices are managed in accordance with the Standards for Universal Waste Management found in 40 CFR Part 273.”

Part II.B Container Storage:

18. Page 1, paragraph 1: The only figure that clearly identifies the container storage area is Figure Part II.Q. If that figure is correct, then Figure 8.1-1 needs to be revised to identify the container storage area. In any case, the container storage area must be identified.
19. Page 1, last paragraph:
1. The first sentence should be changed to “Transfer wastes may be ~~stored~~ located in...”
 2. This paragraph states that transfer waste will be located in the areas of permitted container storage areas. If this is the case, then the two container storage areas (transfer waste areas) identified in Figure 8.1-1 are inconsistent with the container storage area in Figure Part II.Q and the existing permit. These discrepancies must be resolved.
 3. If transfer waste are placed in the container storage areas, you must provide details on how the transfer waste will be identified and kept separate from the permitted storage waste.

20. Page 3, paragraph 2: If the 2' aisle space is not wide enough to remove leaking drums, then the aisle space must be wider.

21. Page 7, last paragraph: Change "FRS wastes are ~~stored~~ kept in steel or polyethylene..." and "...transfer wastes and are ~~stored~~ located for up to 10..."

22. Page 8, first paragraph: It states that boxes containing broken lamps are not accepted at Safety-Kleen. But, in WAP, Part II A, page 15 it states that "Boxes containing broken lamps are accepted only if the box is completely sealed and then sealed again with plastic shrink wrap." Please clarify the policy for broken lamps.

23. Page 9, first paragraph, third sentence: Change "~~Weekly~~ Daily container storage area inspection..."

24. Figure 8.4-1, page 1 of 2, need to add inspection and accounting of containers located on trucks during 72-hour load and unload timeframe similar to comment 14.13.

25. Part II.C Tank Systems:

1. Page 4, first paragraph: Presumably the reference to the Sanford branch should be to the Tallahassee branch. There are also a number of references to the Sanford facility in the Part II.S (Air Emissions) section. I suggest a global search and change.
2. Page 5, Tank Inspection Systems: Referenced Figure 9.4-1, Daily Inspection Log for tank systems is missing.
3. Page 7, last paragraph, first sentence: Add "...spills less than or equal to one pound and immediately contained and cleaned up are exempt from..."

26. Part II.K Closure:

1. Page 2, first paragraph: The containment capacity *may* be different than the information located in Part II.B Containers, page 1, paragraph 3 (2,077 gallons vs. "total" containment volume of 2,594 gallons). The maximum storage capacity of the container storage area appears to be different than the information located in Part II.B Containers, page 1, paragraph 3 (20,770 gallons vs. 25,937 gallons).
2. Page 7, last sentence: Remove the last part of the sentence after "(SOPs)." There is no longer a SAP requirement, and subsection 62-730.225(3), F.A.C. has been repealed.

27. Part II.S: Requirements for Equipment Leaks:

1. Figure 11.1-1 is a partial copy and not completely legible. Submit a complete, legible copy of the piping diagram.
2. Pages 4, 5, 6 and 8 have references to the Sanford facility.