



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

March 3, 1993

Certified
P-232-481-017

FLD-984-17765

Safety Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60123

OCD-HW-92-0257

Attention: Mr. Victor San Agustin

Seminole County - HW
Safety Kleen Corporation - Sanford
Operating Permit Renewal HO59-224117
First Notice of Deficiency

RECEIVED
MAR 4 1993
Hazardous Waste Permits

Dear Mr. San Agustin:

After a review of the above operating permit application, the comments are as follows:

1. Pages I.B.3-1 and II.A.1(c)-1 state "When the glycol tank is inoperable, tank truck to tank truck transfer of ethylene glycol may also occur in Area E." Similarly page II.A.4(b)-2 states "When the antifreeze tank is inoperable, spent antifreeze may also undergo tanker truck to tanker truck transfer".

The Department sees no reason for the tank truck to tank truck transfer of ethylene glycol since there is a 20,000 gallon waste ethylene glycol tank to be used at this facility. If an emergency occurs where the tank is inoperable we can treat this on a case by case basis, not to be conditioned in the operating permit.

If Safety Kleen believes this to be a likely occurrence, we ask to document where in the past their tanks (waste mineral spirits as well as waste ethylene glycol) tanks have become inoperable so that we may evaluate the probability of this happening.

2. Figure I.B.4-2, Figure II.A.1(a)-1, Figure II.A.3-1 (and possibly others) depict the Floodplain Map which was selected from the Federal Emergency Management Agency source. If maps other than the Federal Insurance Administration Map is used, demonstration of equivalent mapping technique should be provided.

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3. Page I.D.2-3 states "the used oil and oily water may be managed in either drums or bulk tanks". The drums are acceptable but clarification is needed regarding the bulk tanks. Indicate details such as where the tanks will be located, dimensions, capacity, management procedures, etc. that will be associated with the bulk oil tanks.
4. Table I.D.3-1 refers to the estimated annual quantities of hazardous waste and storage methods. Please clarify the statement at the bottom of the table to be *** The spent ethylene glycol storage tank has a maximum storage capacity of 20,000 gallons.
5. Page II.A.4(a)-1 describes security measures. All gates and doors are locked at all times when the facility is not in operation. Are they controlled by any automatic locking system or will they remain open while the facility is operating?
6. In Attachment II.A.4(b), the Contingency Plan, Florida Hospital in Altamonte Springs is listed as the responding hospital in the event of an emergency. Please verify that this is the closest hospital in the area or the rationale for selecting them as part of the emergency team.
7. Page II.A.4(b)-2 (Contingency Plan) describes FRS wastes as transfer wastes. We would like the last sentence of the fourth paragraph to read "This transfer will occur on paved surfaces as outlined in Figure II.A.4(b)-1 as Area E with containment and will require less than two hours to complete.

Figure II.A.4(b)-1 will also need to reflect the area designation such as in Figure I.B.3-2 with the legend describing the purpose of each area.
8. Page II.A.4(b)-11 describes the Containment Systems. We would like the last sentence in the first paragraph under Containerized Wastes to read "FRS wastes are handled as transfer wastes and are normally not elevated on pallets but will be stored in a designated area as transfer waste".
9. Page II.A.4(b)-17 describes the Evacuation Plan. Although after "the verbal cry employees are to assemble across from the entrance drive to the facility", this

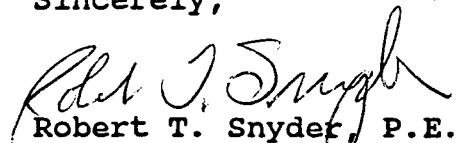
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evacuation plan does not indicate the primary and alternate evacuation routes or the rally point employees must go to so the emergency coordinator may conduct a head count. Please indicate this on Figure II.A.4(b)-1.

10. Attachment II.A.4(b) (Contingency Plan) has included the material safety data sheets for the Safety Kleen products in Appendix A. Pages for the Material Safety Data Sheets appear to be out of order for some products and there was one MSDS which did not appear to be complete. Please send a complete set of the Material Safety Data Sheets for Safety Kleen products which will be stapled or otherwise attached.
11. Figure II.B.1-1 should be revised regarding the designated transfer waste area as discussed with Safety Kleen personnel.
12. External Factors outlined on Page II.B.3-3 discuss storms or cold weather. The probability of thunder storms is very high in this area, precautionary measures taken with regard to lightning storms should also be addressed.
13. Attachment II.C.1 describes the Engineering Assessment of the Tank System. A statement should be included on Page II.C.1-1 or on the diagrams included in Mr. Heyn's report (submitted November 12, 1993) indicating the future and present tank farms have reversed positions as well as the tanks themselves. This point was acknowledged in our letter dated January 4, 1993.

Please do not hesitate to contact Mary McGehee or myself at (407) 894-7555 if you have any questions.

Sincerely,


Robert T. Snyder, P.E.
Program Manager
Hazardous Waste

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RTS/mm

cc: Satish Kastury, FDER
Alan Farmer, EPA Region IV