safety-kleen.

April 23, 1993

Mr. R. Snyder
Florida Department of Environmental Regulation
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

RE: Minor Modification to the Operating Permit Application, Safety-Kleen Corp., Sanford, Florida; FLD 984171165

Dear Mr. Snyder:

Safety-Kleen Corp. is submitting a minor modification to the operating permit application for the above-referenced facility. This modification includes information about a new product (cartridge filters) which Safety-Kleen will be supplying and recycling from its customers. This new product will be managed as a transfer waste under the Fluid Recovery Service (FRS) program. Attachment I.D.2 has been revised to include this new product.

Enclosed is the $250 minor modification fee.

If you have any questions, please call me at (813) 682-8094.

Sincerely,

Victor L. San Agustin

Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

chn/mmm

Enclosure(s)

c: C. Norton - ERM
S. Kastury - FDER, Tallahassee

13112.00/01/FILTER.LTR/2

777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708/697-8460 FAX 708/697-4295

FDER MINOR MOD FEE				1311334.22	#554	250.00
					TOTAL	250.00

ERM-South, Inc.

9501 Princess Palm Ave.
Suite 100
Tampa, Florida 33619
(813) 622-8727
Fax (813) 621-8504

FIRST UNION NATIONAL BANK of FLORIDA
JACKSONVILLE, FL 32231

63-1012
632

018560

CHECK DATE	REFERENCE
4-23-93	18560

AMOUNT
250.00

PAY: TWO HUNDRED FIFTY DOLLARS & NO/100

TO: FDER

ERM-South, Inc.

ATTACHMENT I.D.2

DESCRIPTION OF FACILITY OPERATION

DESCRIPTION OF THE BUSINESS

Safety-Kleen Corp. of Elgin, Illinois is an international, service-oriented company whose customers are primarily engaged in automotive repair and industrial maintenance. Since 1968, Safety-Kleen has been offering a leasing service for hydrocarbon and chlorinated solvents and small parts washing equipment. A unique feature of this business concept is that the solvent is produced through recycling the used solvent that is leased to the customers. Approximately two-thirds of the clean solvent leased has been previously used by the customers.

The Safety-Kleen parts washing equipment, together with the solvents, are leased to customers; the leasing charge includes regularly scheduled solvent changes and machine maintenance. The business is conducted from local service centers (sales branches) located in 45 states domestically that warehouse the products and equipment required to service the customers in their sales areas. On a regular basis, service representatives furnish clean solvent to the customers, pick up the used solvent, and ensure that the leased equipment is in good working order. In 1979, Safety-Kleen expanded their scope of operations to make their solvent leasing service available to owners of parts cleaning equipment, regardless of manufacturer, using Safety-Kleen's solvents.

Basically, Safety-Kleen handles three types of parts washer solvents: a petroleum-based solvent (parts cleaner 105 or premium solvent), and old and new formulations of immersion cleaner. The old formulation immersion cleaner solvent is labeled under the trade name of *Immersion Cleaner and Carburetor and Cold Parts Cleaner #609*. It is a two-phase system consisting of an upper aqueous (water) layer and lower non-aqueous (solvent) layer. The water phase consists of water and Dresinate TX (sodium soap of tall oil). The solvent phase is composed of methylene chloride, orthodichlorobenzene, cresylic acid, and an amines additive. A new formulation immersion cleaner is being marketed under the name *#699* and will eventually replace the old immersion cleaner. The new solvent is composed of heavy aromatic naphtha, N-methyl-2-pyrolidone dipropylene glycol methyl ether, monoethanolamine and oleic acid. The waste contains a maximum of one percent total chlorinated solvents.

The solvents are distributed and collected by Safety-Kleen service representatives. Containers are transported in specially-equipped, enclosed route trucks. Clean parts washer solvent is distributed from and used parts washer solvent returned to the service center where the parts washer solvent is stored in separate aboveground tanks for the clean and used parts washer solvent (parts cleaner 105 and premium solvent). Used parts washer solvent 105 is manifested from the customer as a hazardous waste. Used parts washer premium solvent is transported from the customer as a nonhazardous waste and only becomes hazardous once it is mixed in the used parts

washer solvent tank. Warehouse space is dedicated for the storage of both clean and used immersion cleaner containers. The clean premium solvent (parts washer solvent) is also in the warehouse. Safety-Kleen leases parts washing equipment, including partially filled containers, which double as the solvent reservoir of the parts washer. During servicing, the quantity of used solvent removed from each machine ranges from 5 to 20 gallons.

Periodically, a company truck is dispatched from one of Safety-Kleen's nationwide solvent recycle facilities to the service center to deliver a load of clean solvent and pick up a load of used solvent. Parts washer solvent is transported in bulk tank trucks between the service centers and the recycle facilities. Fresh parts washer solvent is also received at the facility in containers. Parts washer solvent is transported in containers between the customer and the branch. At the branch, it is added to the used parts washer solvent tank. The immersion cleaner remains in the covered containers during transfer between the service centers and the recycle facilities. Approximately 97 percent of the solvent handled in the parts washer business is petroleum-based while the remainder is immersion cleaner.

Safety-Kleen's solvent cycle is essentially a closed loop, moving from the service center to the customer, from the customer to the service center, from the service center to the recycle facility and then from the recycle center back to the service center. The small quantities of residue remaining in the storage tanks at the service centers and after distillation of the used solvent at Safety-Kleen's solvent recycling facilities are disposed of in accordance with applicable laws and regulations.

This closed loop supplies Safety-Kleen with most of its solvent requirements; the resultant stabilized cost benefits are passed on to its customers. Ownership of the solvent remains with Safety-Kleen; the service center managers are accountable for the quantities of clean and used solvents handled by their branch operations. The service center is basically a temporary storage and transfer facility. By FDER definition, however, these centers are considered to be the waste generator.

Safety-Kleen also provides a dry cleaning waste reclamation service where containers of dry cleaning wastes (chlorinated) and parts washer solvent are collected and stored temporarily at the service centers before shipment to the recycle centers for reclamation and residue disposal.

In addition, Safety-Kleen provides a paint waste reclamation service. Wastes containing various thinners and paints are collected in containers and are stored at the service centers. These wastes are periodically shipped to a reclaimer, and the regenerated solvent is distributed to Safety-Kleen customers for use as a product.

Fluid Recovery Services (FRS) is a program managed by the Safety-Kleen Service Centers. Under this program, used products similar to the fresh products provided by Safety-Kleen are collected by the service center and processed by the recycle centers. The FRS wastes will be managed as transfer wastes. The manifest will not be terminated at the service center. These products may or may not have originally been obtained from Safety-Kleen by the industrial customer. Examples of the types of waste that may be received from FRS customers include:

- Spent hydrocarbon distillates, such as waste fuel, oil, petroleum, naphtha, etc.
- Lubricating, hydraulic 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 and paint wastes.
- Other hazardous and non-hazardous halogenated and non-halogenated wastes.

In 1993, Safety-Kleen began offering an optional filtration unit for use with its equipment. The filtration unit is designed to remove large particles from the solvent, thereby extending the life of the solvent. The cartridge filters are changed at least every four weeks by a Safety-Kleen representative. The used filtration cartridges are collected at the customer's site in a small pail which is located next to the equipment. This small pail functions as a satellite accumulation pail. Once the pail is full, it is manifested as hazardous waste, transported to the branch, and managed as a transfer waste under the Fluid Recovery Service (FRS) program. From the branch, the filters are transported to a recycle center for processing. The filters from the parts washer equipment contain essentially the same constituents as those found in dumpster mud.

In 1990, Safety-Kleen began offering a service for the collection of spent antifreeze (ethylene glycol) from automobile service facilities. These wastes are deposited into a carboy or containers by the customer, which are located on the customer's premises. The contents of carboy are pumped into a tanker truck or into containers by a Safety-Kleen sales representative. At the service center, it is then pumped into a 20,000-gallon storage tank (if handled in bulk) or placed in the container storage warehouse (if handled in containers) for shipment to a Safety-Kleen recycle center.

Safety-Kleen also collects used oil filters and oily water. These materials are generally not hazardous wastes. The used oil and oily water will be managed in drums. In the future, Safety-Kleen may request a modification to the facility to install a new tank into the existing tank farm to be used for used oil and/or oily water.