TANK CERTIFICATION REVIEW

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____
To: _____ Location: _____
To: _____ Location: _____
From: _____ Date: _____

Interoffice Memorandum

TO: Bill Kellenberger
District Engineer - Pensacola

THROUGH: Bill Neimes, Professional Engineer II
Hazardous Waste Regulation

FROM: Douglas G. Outlaw, Professional Engineer I DGO
Hazardous Waste Regulation

DATE: January 23, 1990

SUBJECT: Safety-Kleen, Tallahassee: FLD 982 133 159; Operating Permit HO37-171747; Tank Certification Included with Permit Application

The Wishmeier & Associates letter of December 18, 1989, provides a satisfactory explanation for the pressure test procedure at the Safety-Kleen, Tallahassee, site. As we observed during our site visit on January 16, 1990, the flexible hose is part of a quick disconnect coupling system for the wet dumpster and is attached to the used solvent drain line to the storage tank. The hose clamp used to attach the flexible hose to the drain line is adequate due to the relatively low maximum pressure which can occur at the connection and the provision of secondary containment.

Due to the long term potential for deterioration, the hose and clamp connection should be added as a separate item to the daily inspection list for the facility. Installation of a check valve in the drain line to prevent back flow into the wet dumpster is necessary and should be verified.

DO

cc: Jim Scarbrough, EPA/Region IV
Barry A. Swihart, BWP&R
Robert Frost, BWP&R

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION) Bill Nemes	Initial	
	Date	
2. Bum	Initial	
	Date	
3. T. J.	Initial	
	Date	
4.	Initial	
	Date	

RECEIVED JAN 5 1990 WASTE

REMARKS:

85psi NFPA Rat.

System Pressure 15psi

I feel this letter explains adequately.

We can accept test.

Comments?

Please call me

INFORMATION	
	Review & Return
	Review & File
	Initial & Forward

DISPOSITION	
	Review & Respond
	Prepare Response
	For My Signature
	For Your Signature
	Let's Discuss
	Set Up Meeting
	Investigate & Report
	Initial & Forward
	Distribute
	Concurrence
	For Processing
	Initial & Return

FROM:

DATE 5 Jan

PHONE

WISHMEIER & ASSOCIATES
ARCHITECTS • ENGINEERS
119 N. TAYLOR STREET • SOUTH BEND, INDIANA 46601
(219) 234-3433

December 18, 1989

SAFETY-KLEEN CORPORATION
Attn: Ms. Ellen Jurczak
777 Big Timber Rd.
Elgin, IL 60123

RE: SERVICE CENTER BRANCH, TALLAHASSEE, FL

Dear Ellen:

With this letter we will attempt to explain the pipe testing procedure at the Dumpster connection.

The first tests were tried with the "flexible" dumpster connection hoses installed between the hard piping (2" black iron) and the Dumpsters. The flexible hoses which have banded end fittings, would not hold the 85 psi test pressures. This is not an unusual situation. We, therefore, chose to take these flexible hoses temporarily out of the line & test the hard steel piping sections only. The hard piping had no leaks. The flexible hoses were then re-installed.

We believe this to be acceptable. The flexible hoses are located in a secondary containment area. We treat the system pumps in the same fashion. The pump seals fail at a pressure of about 25 psi. Therefore, the pumps are by-passed during the pipe testing, then re-installed after the testing has been completed.

We accept the lines with the flexible hoses and pumps re-installed as we believe this meets the intent of the law.

The initial pressurization used here, 84 psi, was accepted as it was within 5% of the base test pressure of 85 psi. A pipe pressurised to 85 psi would be allowed a 5% pressure drop or 4.25 psi down to 80.75 psi in the 45 minute test period. This is

within reasonable engineering accuracy, given the fact that temperature changes in the piping can move the pressure up or down this amount during the 45 minute test period. In this case, where the initial pressure was 84 psi, a loss of only 3.25 psi would have been permitted.

If you need additional information, please call.

Sincerely,

Charles Keith Wishmeier

Charles Keith Wishmeier, P.E., R.A.
FLORIDA PE 37694
WISHMEIER & ASSOCIATES

CC: Kevin Schmuggerow, Safety-Kleen Corp
file
CKW/mbw

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DEPARTMENT OF ENVIRONMENTAL REGULATION

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Interoffice Memorandum

TO: Bill Kellenberger, District Engineer Pensacola

THROUGH: Tom Moody, P.E. Administrator, Pensacola
Satish Kastury, Administrator
Hazardous Waste Regulation

FROM: Bill Neimes, P.E. II
Hazardous Waste Regulation

DATE: December 7, 1989

SUBJECT: Safety Kleen - Tallahassee; FLD 982 133 159; H037-171747; Tank Certification Included with Permit Application.

I have reviewed the tank certification section of the permit application for the subject permit and offer one comment. On page 2 of the Project Observation Report No. 4 done by Wishmeirer & Associates under the heading Dirty Solvent Line from Dirty Pump to Dumpsters, the pressure test results indicate the dumpster connection hoses could not hold the 85 psi test pressure. The engineer ended up testing only the hard piping and not the flexible piping. The Department will need to know, before accepting the tank certification section, if all piping (flexible and hard) passed the pressure tests.

BN/do