

## Thursby, Kim

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**From:** Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>  
**Sent:** Friday, December 7, 2018 3:54 PM  
**To:** Russell, Merlin  
**Cc:** Thursby, Kim  
**Subject:** RE: Safety-Kleen Systems, Inc.;FLD984171165;First Request for Additional Information (RAI)

Yes, I did receive this item!! Sorry for the delay, and thank you for the reminder.

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**From:** Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]  
**Sent:** Friday, December 07, 2018 7:13 AM  
**To:** Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>  
**Cc:** Thursby, Kim <Kim.Thursby@dep.state.fl.us>  
**Subject:** FW: Safety-Kleen Systems, Inc.;FLD984171165;First Request for Additional Information (RAI)

Good Morning Jeff,

Please let Kim know you received this. Thanks.

merlin

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**From:** Thursby, Kim  
**Sent:** Friday, November 30, 2018 9:43 AM  
**To:** 'Jeff.Curtis@safety-kleen.com' <[Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)>  
**Cc:** Baker, Bryan <[Bryan.Baker@dep.state.fl.us](mailto:Bryan.Baker@dep.state.fl.us)>; Walker, Kim (Waste) <[Kim.Walker@FloridaDEP.gov](mailto:Kim.Walker@FloridaDEP.gov)>; 'bastek.brian@epa.gov' <[bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)>; 'Merizalde.carlos@epa.gov' <[Merizalde.carlos@epa.gov](mailto:Merizalde.carlos@epa.gov)>; White, John <[John.White@dep.state.fl.us](mailto:John.White@dep.state.fl.us)>; 'bob.fox@erm.com' <[bob.fox@erm.com](mailto:bob.fox@erm.com)>; Russell, Merlin <[Merlin.Russell@dep.state.fl.us](mailto:Merlin.Russell@dep.state.fl.us)>  
**Subject:** Safety-Kleen Systems, Inc.;FLD984171165;First Request for Additional Information (RAI)

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](mailto: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](http://www.adobe.com/products/acrobat/readstep2.html).

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.



# FLORIDA DEPARTMENT OF Environmental Protection

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

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Noah Valenstein  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

November 30, 2018

Mr. Jeff Curtis  
5610 Alpha Drive  
Boynton Beach, Florida 33426  
[Jeff.Curtis@safety-kleen.com](mailto:Jeff.Curtis@safety-kleen.com)

Re: First Request for Additional Information (RAI)  
Seminole County – Hazardous Waste  
Facility Name: Safety-Kleen Systems, Inc.  
Facility ID: FLD984171165  
DEP Application No.: 22198-008-HO

Dear Mr. Curtis:

Thank you for your application for an Operation Permit for the above referenced Facility. The Department has assigned DEP Application No. 22198-008-HO to the application. A Department staff review of the application and supporting documentation submitted on November 9, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, December 31, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [merlin.russell@floridadep.gov](mailto:merlin.russell@floridadep.gov). If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the

Mr. Jeff Curtis  
Page 2 of 5  
November 30, 2018

document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [merlin.russell@floridadep.gov](mailto:merlin.russell@floridadep.gov), alerting us that it has been posted.

If you have any questions, please contact Merlin D. Russell Jr by telephone at 850-245-8796 or by e-mail at [merlin.russell@floridadep.gov](mailto:merlin.russell@floridadep.gov).

Sincerely,



Bryan Baker, P.G.  
Environmental Administrator  
Florida Department of Environmental Protection

cc:

Brian Bastek, EPA Region 4, [bastek.brian@epa.epamail.gov](mailto:bastek.brian@epa.epamail.gov)  
Carlos Merizalde, EPA Region 4, [merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)  
John White, FDEP Central District Office, [john.white@floridadep.gov](mailto:john.white@floridadep.gov)  
Robert Fox, ERM, [bob.fox@erm.com](mailto:bob.fox@erm.com)

Attached: List of Requested Information

### **Attachment: List of Requested Information**

Facility Name: Safety-Kleen Systems, Inc  
Facility ID: FLD 984 171 165  
DEP Application No.: 22198-008-HO

#### **General Comments:**

1. Any revisions to the Part B in one location must be done throughout the document. Although this RAI tries to point out multiple locations throughout the Part B where identical changes are required or suggested, it is the responsibility of Safety-Kleen to ensure changes are made throughout the Part B.
2. It is our understanding that the Continued Use Program (CUP) has been discontinued. If this is the case, the Part B needs to eliminate all portions of the renewal that discuss the CUP (e.g., see comment 17.a).
3. In your response, ensure that you include a final electronic copy of your application.

#### **Specific Comments:**

4. Part I.D.2, page 4, paragraph 1, 9th sentence: "...antifreeze in 55-gallons containers..."
5. Part I.D.2, page 4, paragraph 2: Two sentences seem to be out of order. The paragraph would read better if the sentence "The used oil is then transported to the Safety-Kleen Ocala, FL facility." Was moved after "The Branch is registered..."
6. Figure 2.1-1 Site Layout Map: "Concrete" is identified in the legend; however, the stippling is not used to identify the concrete pavement on the western side of the facility.
7. Figure 2.1-2 Truck Traffic Patterns: The "Note" at the bottom of the legend should be removed.
8. Figure 2.2-4 Legal Boundary of the Facility: "Concrete" is identified in the legend; however, the stippling is not used to identify the concrete pavement on the western side of the facility.
9. Figure showing wells, groundwater contamination areas, wastewater sites, etc. Keep in mind that you can also use the Department's Contamination Locator (CLM) Map to locate nearby sites that are currently under DEP's cleanup oversight at:

<http://prodenv.dep.state.fl.us/DepClnup/welcome.do>

- CLM identifies another site within your search area located at 3301 West State Road 46.
10. Part 1, page 3, paragraph 2: If some paint wastes are also managed as transfer waste, it should be noted here.
  11. Part 1, Table 1 Closure Cost Estimate Worksheet: In your 2013 renewal, the unit cost for disposal/treatment per drum was \$107.00. Provide the basis/backup for the \$90.00/drum estimate in the current cost estimates.
  12. Part 2, page 1: The text on the 100-year floodplain area and surface water bodies below it should be edited:
    - a. Figure 2.2-2 identifies the canal as the Lockhart Smith Canal.

- b. Based upon Figure 2.2-2, it appears that it runs along the northern, western and southern property boundaries. The second paragraph omits the northern portion.
- c. The locations of the two lakes referenced in the last sentence is unclear on either Figure 2.2-1 or 2.2-2. If you are going to call out these lakes, identify them on one of the figures.

### 13. Contingency Plan

- a. Per Subsection 62-730.161(1), F.A.C., a Quick Reference Guide (QRG) must be developed<sup>1</sup>. The QRG includes eight elements that are critical to local responders when an emergency is occurring at a facility:
  - i. The types and names of the hazardous wastes on site and their hazard in layman's terms (e.g., toxic paint wastes, spent ignitable solvents);
  - ii. An estimated maximum amount of each hazardous waste on site at any one time;
  - iii. The identification of any hazardous waste that would require unique or special treatment by medical staff in the event of exposure;
  - iv. A map of the facility identifying where hazardous waste may be located;
  - v. A street map of the facility in relation to surrounding businesses, residences, and schools;
  - vi. The location of the water supply;
  - vii. Information about any on-site notification systems to communicate with people at the facility; and
  - viii. The name of an emergency coordinator available at any time.

The Department recommends that you discuss the appropriate contents of the QRG when making arrangements with local emergency responders to coordinate on whether any additional information would be useful to those responders in the case of an emergency.

- b. Page iii, emergency coordinators, was not included.
- c. Page 4 under "Purpose": "...40 CFR Part 264.30- ~~37~~ 56."
- d. Page 5: The description of your used oil services was not included.
- e. Page 12: The Florida State Warning Point number is 1-800-320-0519 (See <https://www.floridadisaster.org/hazards/hazmat/> )
- f. Page 17, last paragraph. The dimensions of the container storage unit are a little different than what is shown on Figure 5.6-3. The differences must be reconciled.
- g. Figure 5.6-4 Return/Fill Shelter: Reference to the continued-use vat should be removed.

### 14. Waste Analysis Plan

- a. Page 2, first paragraph: "Orange Park" should read "Sanford". We suggest a global search be done to see if there are any other references to Orange Park in the Part B.
- b. Page 3, item 4: The WAP needs to address how these still bottom wastes from the System One type units will be characterized and managed by the company. Does the characterization and/or management method differ if the customer is identified as a small or large quantity generator, as opposed to a conditionally exempt small

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<sup>1</sup> See <https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final-rule>

- quantity generator?
  - c. Page 6: Antifreeze should be added to the FRS wastes as management of used antifreeze is discussed throughout the Part B.
  - d. At other Safety-Kleens, D002 wastes are sometimes managed as transfer wastes. You may want to consider including D002 as a transfer waste.
  - e. Page 10, paragraph 2: The list of waste streams used in the AR are on page 11.
15. Part II.B Containers, page 8: Change “Figure 8.1-1” to “Figure 8-1”.
16. Part II.C Tanks, Figure 9.2-2 (secondary containment calculations): The “5,894 gallons” value as a displacement volume should be deducted from the total capacity calculation to derive the net secondary containment volume [Note: The “5,894” value is indicated under the “Individual support pads” portion of the “Vertical Tank Displacement” section of the presented calculation sheet entitled “Tank Farm”].
17. Part II.K Closure
- a. Page 1, item 1.b: We believe the Continued Use Vat is no longer being used.
  - b. Your November 15, 2018 Closure Insurance Policy and Inflation Increases is currently under review. However, it is noted that the cost estimate of \$140,385 (in the Nov. 14 document) is *below* the cost estimate in your Part B of \$144,221.
18. Part II.P: The list of Solid Waste Management Units does not include the battery storage area. If this area is not within an existing SWMU, it should be identified as a new SWMU using a SWMU Profile Sheet (One can be sent to you). If the battery storage area is within an existing SWMU, the description in this section (Part II.P) should be updated to include the battery storage area.
19. Part II.S Air Emission Standards
- a. Table 11.2-3 Subpart CC Control Options: We believe some of the referenced regulations are incorrect:
    - i. Item 3: We believe the reference to 40 CFR 264.1084(f)(3)(I) should be 40 CFR 264.1084(f)(3)(i)(A).
    - ii. Item 6: We believe the reference to 40 CFR 264.1084(1) should be 40 CFR 264.1084(i).
    - iii. Item 8: We believe the reference to 40 CFR 264.1086(b)(1) and (c)(1)(i) should be 40 CFR 264.1086(c)(4)(ii) and (d)(4)(ii).
    - iv. Item 14: We believe the reference to 40 CFR 264.1086(d)(1)(i) should be 40 CFR 264.1086(d)(4)(ii).
  - b. Table 11.2-3 Subpart CC Control Options: Some of the referenced regulations do not exist and should be replaced with correct references:
    - i. Item 15: 40 CFR 264.1088(b)(1)(iii) and (d)(1)(ii).
    - ii. Item 16: 40 CFR 264.1088(b)(1)(ii) and (c)(1)(i).
    - iii. Item 17: 40 CFR 264.1088(b)(2) and (e)(1)(i).
    - iv. Item 18: 40 CFR 264.1088(b)(2) and (e)(1)(ii).