



August 17, 1993

**VIA FEDERAL EXPRESS**

Robert Snyder, P.E.  
Florida Department of  
Environmental Protection  
Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, FL 32803-3767

Re: Safety-Kleen Corp., Sanford, Florida FLD 984171165; HO59-233147, Actrel® Notice of Deficiency

Dear Mr. Snyder:

Safety-Kleen Corp. (Safety-Kleen) has reviewed the Actrel® Modification Notice of Deficiency for the above referenced facility. Below are comment by comment responses. In addition, revised pages to the operating permit application are included.

OK

1. The appropriate pages of the text (I.D.2-2 and II.A.5-1) have been revised to reflect that the used Actrel® becomes hazardous once it is mixed with the waste in the barrel washer/dumpsters.

OK

2. The appropriate portions of the text (pages I.D.2-2, II.A.5-1, II.A.5-3, and Table I.D.3-1) have been revised to indicate that the spent premium solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11. The difference between the management of spent Actrel and spent Premium Solvent is that spent Actrel is managed as hazardous unless the generator wishes to demonstrate that it is non-hazardous, whereas with spent Premium Solvent, the generator is encouraged to make a hazardous waste determination in accordance with 40 CFR 262.11 because it is more likely that, based upon the customer's use of the waste minimization training video provided by Safety-Kleen and based on the generator's certification, it is more likely that the Premium Solvent will show as being non-hazardous.

OK

3. Per our August 4, 1993 meeting at the annual US Environmental Protection Agency (EPA)/Florida Department of Environmental Protection (FDEP)/Industry workshop, Safety-Kleen has no objection to a specific permit requirement which would require that the clean solvent tank be certified that the existing product in it has been removed to a level representing no more than 3% of the total volume of the tank prior to changing the

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product stored in the product tank. Per our discussion, the certification may be in the form of a notarized statement from the branch manager or branch facility manager. Safety-Kleen does not intend to routinely change which product is stored in the tank but does want the flexibility that as the market changes it can handle the most appropriate product in bulk.

The figures in the Operating Permit Application identify the contents of the tank as Fresh Parts Washer Solvent. The tank is currently labeled "105 Solvent." If the product stored is changed the labeling on the tank will be changed to reflect the product name.

- JK*
4. The appropriate portions of the text (pages I.D.2-2, II.A.5-1, II.A.5-3, and Table I.D.3-1) have been revised to indicate that the spent Premium Solvent is transported in accordance with the generator's hazardous waste determination pursuant to 40 CFR 262.11. The difference between the management of spent Actrel and spent Premium Solvent is that spent Actrel is managed as hazardous unless the generator wishes to demonstrate that it is non-hazardous, whereas with spent Premium Solvent, the generator is encouraged to make a hazardous waste determination in accordance with 40 CFR 262.11 because it is more likely that, based upon the customer's use of the waste minimization training video provided by Safety-Kleen and based on the generator's certification, it is more likely that the Premium Solvent will show as being non-hazardous.
  5. The text on page II.A.5-4 has been revised to indicate that the Actrel® filters are placed in the waste sludge satellite accumulation drum and not in the dumpster, itself. Therefore, the Actrel® filters will not require any more frequent emptying of the dumpster than is currently being performed. The dumpsters are emptied at least once each working day.

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

Sincerely,



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

pjh/mmm

Enclosure(s)

c: C. Norton - ERM