

Thursby, Kim

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Monday, December 11, 2023 1:41 PM
To: Coleman, Lauren J.
Cc: Thursby, Kim
Subject: Re: Still Need Response

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Lauren/Kim,

We received this document.

Thank you
Sent from my iPhone

On Dec 8, 2023, at 8:39 AM, Coleman, Lauren J. <Lauren.Coleman@floridadep.gov> wrote:

Jeff,

Please acknowledge receipt of RAI.

Thanks,

Lauren

From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Friday, December 8, 2023 7:39 AM
To: Coleman, Lauren J. <Lauren.Coleman@FloridaDEP.gov>
Subject: Still Need Response
Importance: High

Lauren,
I have not received response from your facility SK-Sanford document that was sent out through e post email on December 4, 2023. I have attached pdf that was sent out through e post email. Can you please check to see if the e post email was received? Let me know if you have any questions or comments.

Thanks,
Kim

Kim Thursby

Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Mail Station 4560
Direct with voice mail (850) 245-8792



<First RAI Safety Kleen Sanford_ 120423.pdf>

Thursby, Kim

From: Starling, Tamela
Sent: Monday, December 4, 2023 2:44 PM
To: Maggie.Tenaut@safety-Kleen.com
Cc: Smith, Michell M.; Walker, Kim (Waste); Coleman, Lauren J.; Thursby, Kim; 'Brian Bastek, EPA Region 4'; Merizalde, Carlos; Vogel, Jennifer; Financial Assurance Working Group; Jeff.Curtis@safety-kleen.com; Russell, Merlin; Parker, Andie; Hall, Daniel K.; Eckoff, Michael
Subject: First Request for Additional Information (RAI) Safety Kleen (Sanford) EPA ID#FLD984171165
Attachments: First RAI Safety Kleen Sanford_ 120423.pdf

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 (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.

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.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

REQUEST FOR ADDITIONAL INFORMATION

December 04, 2023

Maggie Tenant, VP Environmental Compliance
Safety Kleen Systems, Inc.
Sanford Service Center
600 Central Park Drive
Sanford, FL, 32771
Maggie.tenant@safety-kleen.com

Re: **First Request for Additional Information (RAI)**
Safety Kleen (Sanford)
EPA ID Number: FLD 984 171 165
Current Operating Permit: 22198-xxx-HO
DEP Application Number: 22198-009-HO
Seminole County – Hazardous Waste

Dear Ms. Tenant:

Thank you for your revised application for an Operating Permit Renewal for the above referenced Facility. A Department staff review of the application submitted on November 10, 2023, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220, Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete. Please provide the information in the attached document and refer to this correspondence in your response.

In order for the Department to continue processing your application, please submit the information requested as soon as possible. The response must be signed, sealed, and dated by a registered Florida Professional Engineer. The Department must receive a response within 60 days of the date of this letter, or January 29, 2023, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to subsection 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.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to lauren.coleman@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/RCRA/>. After posting the

document, send an e-mail to HWPP@dep.state.fl.us, with a copy to lauren.coleman@floridadep.gov, alerting us that it has been posted.

If you have any questions, please contact Lauren Coleman by email or telephone at (850) 245-8765.

Sincerely,



Michell Mason Smith, Environmental Administrator
Hazardous Waste Program & Permitting

Attached: List of Requested Information

Cc (w/ Attachment):

Brian Bastek, EPA Region 4 bastek.brian@epa.gov
Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Jennifer Vogel, EPA Region 4, vogel.jennifer@epa.gov
Financial Assurance Working Group, DEP Headquarters,
financial.assurance.working.group@floridadep.gov
Jeff Curtis, Safety-Kleen, jeff.curtis@safety-kleen.com
Merlin Russell, DEP Headquarters, merlin.russell@floridadep.gov
Andie Parker, DEP Headquarters, andie.parker@floridadep.gov
Danial Hall, DEP Central District, Daniel.k.hall@floridadep.gov
Michael Eckoff, DEP Central District, Michael.eckoff@floridadep.gov

Attachment: List of Requested Information

Safety Kleen (Sanford)
EPA ID Number: FLD 984 171 165
DEP Application Number.: 22198-009-HO

Part I Comments:

- 1) [1/334] EPAID should be corrected to FLD 984 171 165
- 2) [8-9/334] DEP Form 62-730.900(2)(d), Page 3 of 3 is duplicated.
- 3) 3-4/334] Table of Contents (TOC):
 - a) There are many disparities between what is listed in the TOC and what is included in each of those sections.
 - i) Page numbers should be revised so that the TOC can be utilized for quickly finding information in the PDF document. When each section restarts page numbering the TOC becomes unusable.
 - ii) Review Section names to ensure the headings listed in the TOC match with what is utilized in the document.
 - b) Parts 1.B.3 - 1.D.5 are before Part 1 in the PDF but the TOC states the opposite.
- 4) [32/334] "HW Trans" expiration date should be changed to match the Hazardous Waste Transportation Certificate of Approval dated March 9, 2023.

Waste Analysis Plan:

- 5) The Department no longer accepts the Annual Recharacterization and it must be removed from the WAP. Safety Kleen is to develop a site-specific WAP for its Sanford Branch. The Department recommends use of EPA's *Waste Analysis at facilities that Generate, Treat, Store, and Dispose of Hazardous Waste-Final* April 2015 (EPA 530-R-12-001).
 - a) Ensure that the WAP meets the requirements of Chapter 62-160, F.A.C. (Quality Assurance).
 - b) Identify the methodology for selecting laboratory methods used for characterizing wastes that fail the qualitative/visual analysis at the generator's location or that contain questionable contents.
 - c) Identify the suite of laboratory methods that could be used to characterize the wastes.
- 6) Page 17: **270.14(a), 264.13(a)(1), 268.1, 268.7, 268.9, 268.32-37, 268.41-43 Waste Analysis:** Explain the process for determining Underlying Hazardous Constituents.