



Transmitted Via Email to HWPP@dep.state.fl.us and lauren.coleman@floridadep.gov

January 9, 2024

Ms. Lauren Coleman
Hazardous Waste Permitting
Florida Department of Environmental Protection
2600 Blair Stone Rd., MS #4560
Tallahassee, FL 32399

RE: **First Request for Additional Information (RAI)**
Safety-Kleen Sanford
EPA ID Number: FLD 984 171 165
Current Operating Permit: 22198-008-HO
DEP Application Number: 22198-009-HO
Seminole County – Hazardous Waste

Ms. Coleman,

On December 4, 2023, Safety-Kleen Systems, Inc. (Safety-Kleen) received the first Request for Additional Information (RAI) from the Florida Department of Environmental Protection (FDEP). Please see below FDEP's comments followed by Safety-Kleen's responses.

Part I Comments:

- 1) [1/334] EPAID should be corrected to FLD 984 171 165

Safety-Kleen Response:
The EPAID has been corrected on page one.

- 2) [8-9/334] DEP Form 62-730.900(2)(d), Page 3 of 3 is duplicated.

Safety-Kleen Response:
The duplicated Page 3 of 3 has been removed from the application.

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.

Safety-Kleen Response:

The page numbers of the application have not been revised for several reasons. First, there are several forms and documents that have their own page numbers. If a second page number was added to a page number it would be very confusing to the reader. Second, Safety-Kleen feels that adding page numbers to the entire document would make revising the application difficult. If page numbers were added to one section then the rest of the permit application would be affected and need modified page numbers which adds to the likelihood of mistakes occurring in the numbering.

- ii) Review Section names to ensure the headings listed in the TOC match with what is utilized in the document.

Safety-Kleen Response:

The TOC has been reviewed and revised as requested.

b) Parts 1.B.3 - 1.D.5 are before Part 1 in the PDF but the TOC states the opposite.

Safety-Kleen Response:

Part I has been reviewed and reorganized to follow the TOC.

4) [32/334] "HW Trans" expiration date should be changed to match the Hazardous Waste Transportation Certificate of Approval dated March 9, 2023.

Safety-Kleen Response:

The requested changes have been made to this form. Corrections have been made to the "Date Issued" and "Expiration Date" columns.

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.

Safety-Kleen Response:

Please refer to the attached letter that Safety-Kleen sent to FDEP on 9-12-2023 in regards to the Safety-Kleen Orange Park First RAI Waste Analysis Plan response.

If you have any questions regarding the information submitted in this modification request, please contact me at 308-241-0889 or via email at zebre.jessica@cleanharbors.com or Jeff Curtis at 561-523-4719 or via email at jeff.curtis@safety-kleen.com.

Sincerely,



Jessica Zebre
Sr. Environmental Compliance Manager
Safety-Kleen Systems, Inc.

This is to certify that I have reviewed/examined the information submitted with this Request for Information response.

Name of Professional Engineer: N.D. Eryou, P.E.

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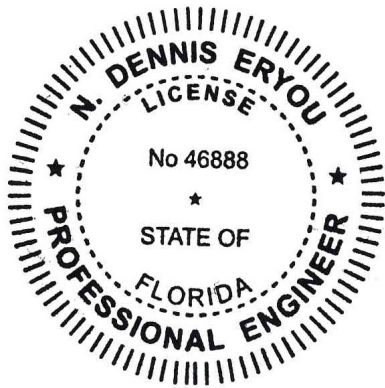
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Signature

[PLEASE AFFIX SEAL]



This item is digitally signed and sealed by N. Dennis Eryou on the date adjacent to the seal

Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.