

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Kathleen Z Lawson
EPA ID: N C D 0 0 0 7 7 6 7 4 0
Facility Name: SAFETY-KLEEN SYSTEMS, INC (Raleigh)
Document Group: Permit (P)
Document Type: Modification (MOD)
Description: Issued comments on a Class 2 modification to raise the height of the tank system secondary containment system
Date of Doc: 11/19/2013
Author of Doc: Kathleen Z Lawson

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North Carolina Department of Environment and Natural Resources
Division of Waste Management

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Secretary

November 19, 2013

Todd Blake
Environment, Health and Safety Manager
Safety-Kleen Systems Inc.
P.O. Box 843
Oak Ridge, North Carolina 27310

Re: Part B Application--Hazardous Waste Management Permit
Safety-Kleen Systems Inc.
Notice of Deficiency
EPA ID # NCD 000 776 740

Dear Mr. Blake:

An initial review has been performed on your modification request to increase the volume of the tank system secondary containment dated October 7, 2013. Because this modification is a physical addition to the secondary containment, sufficient information for the purposes of construction must be submitted with the modification request. In addition to the construction information the following items need to be addressed:

1. The cover letter for the modification states that "Additional permit related drawings (i.e., Site Plans, etc.) affected by these changes will be updated to reflect the new tank farm layout and submitted to the Department under separate cover as an addendum to this permit modification request." These drawings must be submitted before the modification can be approved.
2. The calculation of the secondary containment calculation includes one 10,000-gallon tank and **three** 15,000-gallon tanks. The drawing provided with the modification request shows one 10,000-gallon tank and **four** 15,000-gallon tanks. Include the displacement for all tanks in the calculation. Note that the currently proposed modification design does not provide sufficient secondary containment capacity for the five tanks shown in the Figure provided with the modification request.
3. The sump which is the lowest portion of the secondary containment will now be mostly covered by one of the proposed tanks. Indicate how Safety-Kleen will inspect this sump and how it will be emptied when found to contain liquids. In addition, Figure D-4 in the

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Permit Application shows two sumps while Figure D-5 and the Figure provided with the modification request show only one sump. Show the location of both sumps on Figure D-5 and the Figure provided with the modification request. Provide the inspection and emptying procedures for this sump also. (Note – the volume of the sump was not used in calculating the secondary containment in the renewal application.) Include the volume of both sumps in the secondary containment calculation or remove the extra sump from Figure D-4.

4. The formula provided for the volume of the sump is incorrect. It should be “ $V=\pi(R^2)(D)$ ” The calculation for the sump includes an incomplete symbol for pi. Correct the formula and the calculation.
5. The Figure provided states that angle iron will be bolted to the concrete every 2-3 feet. Provide the maximum space between the anchor bolts and show that this is sufficient to support the pressure provided by two inches of fluid pressing against the vertical side of the angle iron.
6. The Figure provided states that the corners of the angle iron addition will be “welded liquid tight.” Show specifically how the angle iron will be cut at the ends and the specific type of weld that will be used to seal the corners.
7. The figure provided should show specifically how the sealant will be placed at the junction of the angle iron and the concrete, similar to the depiction of a weld.
8. The Product Data Sheet for Sikaflex 1A (<https://usa.sarnafil.sika.com/downloads/repository/submittal/productdata/sikaflex1a.pdf>) recommends that the Owner or Owner’s designated representative inspect the sealant at least twice a year and after each storm. Describe the inspection process for the secondary containment seal between the concrete and the angle iron and include it in the inspection schedule.
9. The Product Data Sheet also states that the sealant has good resistance to water and diluted acids and alkalines. Indicate that the sealant is also compatible with and resistant to the products and waste stored in the tanks within the secondary containment system. If it is not resistant to the materials stored in the tanks, Safety-Kleen must find another sealant or indicate how the sealant will be fortified such as coating it with a compatible and resistant sealant.
10. Safety-Kleen must show that the proposed design meets the requirements of the RCRA regulations regarding secondary containment, 40 CFR 264.193(c)(1) and 264.193(e)(2).
11. Safety-Kleen must certify the modification addendum in accordance with 40 CFR 270.11(b) and (d).

Also, the modification has been determined to be a **Class 2 modification** per Item G. 2. of Appendix 1 to 40 CFR 270.42. Therefore:

1. Safety-Kleen must submit an additional \$900.00 fee. This is the difference between the \$100.00 fee already received and the \$1,000.00 fee for a Class 2 modification. An invoice is enclosed.
2. Safety-Kleen must send a notice of the modification request to all persons on the facility mailing list maintained by the Hazardous Waste Section (HWS) and to the appropriate units of State and local government as specified in 40 CFR 124.10(c)(ix) and must publish this notice in a major local newspaper of general circulation. This notice must be mailed and published within 7 days before or after the date of submission of the modification addendum, and Safety-Kleen must provide to HWS evidence of the mailing and publication. The notice must include:
 - a. Announcement of a 60-day comment period, in accordance with Section 270.42(b)(5), and the name and address of an Agency contact to whom comments must be sent;
 - b. Announcement of the date, time, and place for a public meeting held in accordance with Section 270.42(b)(4);
 - c. Name and telephone number of the Safety-Kleen's contact person;
 - d. Name and telephone number of an Agency contact person;
 - e. Location where copies of the modification request and any supporting documents can be viewed and copied; and
 - f. The following statement: "Safety-Kleen's compliance history during the life of the permit being modified is available from the Agency contact person."
3. Safety-Kleen must place a copy of the permit modification request and all supporting documents, including all information requested above, in a location accessible to the public in the vicinity of the permitted facility.
4. Safety-Kleen must hold a public meeting no earlier than 15 days after the publication of the notice required in paragraph (b)(2) of this section and no later than 15 days before the close of the 60-day comment period. The meeting must be held to the extent practicable in the vicinity of the permitted facility. Safety-Kleen should make all information regarding the modification, including the information requested above, available to the public at the hearing.
5. The public shall be provided 60 days to comment on the modification request. The comment period will begin on the date Safety-Kleen publishes the notice in the local newspaper.
6. Any comments received should be submitted to the Agency contact identified in the public notice.

Seven (7) copies of an addendum addressing these issues must be submitted before the modification can be approved.

If you have any questions or need a clarification of any item on the attached list, please contact me at (919) 707-8214 or kathleen.lawson@ncdenr.gov.

Sincerely,



Kathleen Z. Lawson
Facility Management Branch
Hazardous Waste Section

Attachment

ec: Jon D. Johnston, US EPA, Region 4
Gwen Gleaton, US EPA, Region 4
Carlton Merritt, Safety-Kleen
Daryl Crews, Safety-Kleen
Jim Gilreath
Bud McCarty
Kathleen Z. Lawson
Todd Blake, Safety-Kleen



North Carolina Department of Environment and Natural Resources
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INVOICE

**TO NORTH CAROLINA COMMERCIAL STORAGE, TREATMENT,
AND DISPOSAL FACILITIES**

FACILITY ID: NCD 000 776 740

COMPANY NAME: Safety-Kleen Systems, Inc.

ADDRESS: 125 Sommerville Park Road
Raleigh, North Carolina 27603

**DESCRIPTION OF FEES FOR A COMMERCIAL PERMIT
APPLICATION OR MODIFICATION**

PERMIT APPLICATION FEE:		PERMIT MODIFICATION FEE:	
STORAGE FACILITY	\$ _____	CLASS 1	\$ _____
TREATMENT FACILITY	\$ _____	CLASS 2	\$ <u>\$900.00</u>
DISPOSAL FACILITY	\$ _____	CLASS 3	\$ _____

TOTAL AMOUNT OF FEE(S) DUE IS \$ _____ AS AUTHORIZED BY
G.S. 130A-294.1

MAKE CHECK PAYABLE TO: NCDENR / DIVISION OF WASTE MANAGEMENT
MAIL CHECK TO: 1646 MAIL SERVICE CENTER
RALEIGH, NC 27699-1646

***IMPORTANT: YOUR FACILITY ID NUMBER MUST BE ON YOUR CHECK**

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