



29 May 2002

Certified Mail #70011940000588551455

Mr. John White  
Department of Environmental Protection  
3319 Boulevard, Suite 232  
Orlando, FL 32803-3767

**RE: Consolidation of Oil Filters at Safety-Kleen (Sanford)**

Dear Mr. White,

In efforts to reduce transportation cost and the potential for accidental release, Safety-Kleen (Sanford) Facility will begin consolidating 30 gallon used oil filter drums into a filter bin. As per our conversation on May 22, 2002, this operation does not conflict with Rule 62-710.850 or Safety-Kleen's RCRA permit. Furthermore, Safety-Kleen (Sanford) is currently registered as an Oil Filter Transporter and Transfer Facility within the State of Florida.

Safety-Kleen (Sanford) plans to store the bin within areas of the facility that provide shelter from weather, impervious floor and although not required under the oil filter storage standard, secondary containment. There may be unforeseen occasions where the bins may be stored in the drum storage area of the facility before being off-loaded by the transporter. The bins, in which the filters will be consolidated, are made of 12-gauge steel, provide their own protection from weather and hold approximately 330 gallons. The consolidation will require the Safety-Kleen Service Technician to tilt a 30 gallon oil filter drum on the "return and fill" loading dock into the oil filter bin positioned below. This will provide secondary containment if a spill should occur and eliminate lifting full 30-gallon containers. Once the container is emptied, the drums will be washed clean in the "return and fill" dumpster and returned to used oil filter customers. First Recovery will be the transporter responsible for emptying full bins and transporting them to US Foundry in Medley, FL.

Thank you for your assistance regarding this matter. If you have any questions or concerns, please feel free to contact me at (813) 340-0976.

Sincerely,

Matt Hedrick  
Safety-Kleen Florida EHS Manager

cc. Keith Marcille - Safety-Kleen (Sanford)

