



February 25, 1992

Sent Via Federal Express  
Mail - February 25, 1992

Mr. Robert Snyder, P.E.  
Hazardous Waste Section  
Florida Department of Environmental  
Regulation - Central District  
3319 Maguire Blvd., Suite 232  
Orlando, FL 32803-3767

Subject: RCRA Inspections Dated May 17 and Oct. 30, 1991  
Response to Recommended Corrective Action 10.a.  
Safety-Kleen Corp. - Altamonte Springs Branch  
EPA ID No. FLD 097 837 983

Dear Mr. Snyder:

The purpose of this letter is to respond to one of the recommended corrective actions specified in John White's inspection report dated November 14, 1991.

Section 10.a. of the report recommends that Safety-Kleen must "provide a written plan designed to identify other facilities where this violation has occurred and correct the violation." The alleged violation referenced is that Safety-Kleen transported hazardous waste without a manifest from 2 customers who are large quantity generators. Safety-Kleen already explained in our response dated January 13, 1992 as to why the alleged violation occurred and that the matter has been resolved. This response is to provide to you the written plan requested.

In our response dated January 13, 1992, we mentioned that development of the plan requires a possible coordination between FDER's/USEPA Region IV's and Safety-Kleen's database of EPA ID numbers. Such a coordination was attempted between the State of Minnesota's and Safety-Kleen's databases.

The merging between the two systems was not successful. The computer comparison can only be done either by company name or by address. Cross checking between company names and addresses was not successful because the name or address in Safety-Kleen's system differed from the name or address of the State of Minnesota's system, for the same customer. Many

such discrepancies were noted and were found to be unmanageable at the computer level.

Given our experience in Minnesota, Safety-Kleen has decided to first deal with this issue manually. Beginning September, 1991, Safety-Kleen began using EPA Region IV's list of EPA ID numbers for all of Florida's Large Quantity Generators and Small Quantity Generators between 100 to 1000 kg/month. We have since decided to obtain such printouts from FDER's Bureau of Information systems every calendar quarter beginning 1992's second quarter. We decided to use Florida's system rather than EPA Region IV's because according to a discussion with Mr. Michael Redig of BWPR-FDER on February 24, it was indicated that the information in the state's system would be more current. We feel that a quarterly update is appropriate at this time realizing that the state's system will change periodically.

Each Safety-Kleen Corp. branch in Florida should have the FDER printouts in March. Before a pick-up of hazardous waste is made from a customer, the branch compares the generator status on the customer invoice with the status on the EPA listing. Corrections are made when an inconsistency in generator status is found. Since we do pick-up wastes from all our customers every 4 weeks or even up to every 16 weeks, each branch will eventually cross check all of its customers by the end of a 16 week cycle. Cross checking between customer invoices and the FDER listing will commence in 1992's second calendar quarter.

As far as accepting hazardous waste from government-owned, contractor operated facilities, each branch is now aware that any waste pick-up within a government owned base or facility even if there are contractors within it must comply with all applicable manifesting requirements. There are only a very small number of such facilities within a branch's sales region therefore, each branch has been made aware to use the generator status and the EPA ID number of the entire base or facility.

We hope that this plan is satisfactory. If you have any questions or concerns, please call me at (813) 682-1176.

Sincerely,

*Victor L. San Agustin*

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

cc: Allan Farmer, USEPA IV  
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