DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD JACKSONVILLE, FLORIDA 32207 (904) 396-6959



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY G. DOUG DUTTON DISTRICT MANAGER

May 5, 1983

Colonial Pipeline Company 3390 Peachtree Road N. E. Lenox Towers Atlanta, Georgia 30326

ATTENTION: Mr. Jim Sorrow

Dear Sir:

Enclosed is a copy of the letter (RE: Collonial Pipeline Company Tank Cleaning Transportation and Disposal of Waste) that was not included in the Aptil 27, 1983 correspondence.

If I can be of further assistance, please do not hesitate to call.

Sincerely,

Ernest Frey, Supervisor Hazardous Waste Section

EEF: flb

Enclosure

Colonial Pipeline Company 3390 Peachtree Road N.E. Lenox Towers Atlanta, Georgia 30326 Attention: Mr. Jim Sorrow April 12, 1983

Subject: M & W Industrial Coating, Inc.
Hazardous and Non-Hazardous
Reclaiming and Disposal Remedial
Activity Program

Re: Colonial Pipeline Company Tank Cleaning Transportation and Disposal of Waste

Gentlemen:

Our procedures over the past five years in tank cleaning, gas freeing, lead freeing, transportation, reclaiming and disposal of residual waste are detailed below.

Step 1. TANK CLEANING

- A. External inspection of the tank and a survey of the immediate area, provide trained crew and inspection of equipment.
- B. Isolating the tank from piping sources of oil or vapor.
- C. Blinding off the tank after all the oil possible has been removed.
- D. Vapor-freeing the tank.
- E. Testing the tank for Hydrocarbon vapors and toxic gases. Also, opening the tank for entry.
- F. Cleaning and emptying tank by using detergent, labor and necessary approved pumps to empty the tank and leave in a clean and gas free condition.
- G. Secure sample of mixture and have analyzed for EP toxicity lead and flash. Furnishing the generator a document of the results.

Step 2. TRANSPORTING OF SLUDGE

- A. If facilities are available, sludge will be accumulated and stored until the quantity is sufficient to fill transport trailer.
- B. Provide D.O.T. approved transport trailer and qualified driver to move bulk waste from generator's facilities. The manifest will be completed and signed by the transporter; summarizing the proper class and EPA I-D Number, destination and quantity, in compliance with CFR-263-20 Sub-part B.

Step 3. RECEIVING, RECLAIMING AND DISPOSAL PROCEDURE A. Upon arrival at the reclaiming facility, manifest will be verified for class and quantity. B. Manifest will be completed through transporter portion by M & W Industrial Coating. Final disposal will be verified by internal manifest which tracks waste through recycling process. Hazardous waste manifest and internal manifest (M & W) will be returned to generator to verify disposal. C. Residual products will be off loaded into our holding tanks and separated to recover all salvageable ends for mixing with useable waste oil. D. The semi-solid non-useable residual waste will be transferred to a separate settling tank pending disposal. Step 4. FINAL DISPOSAL A. Residual waste will be mixed and a sample will be taken and analyzed for E.P. toxocity lead and flash. This information will then be recorded on our internal manifest and retained until final disposal in accordance with C.F.R. 40 Section 241. 201-2 "Copy of internal manifest enclosed for your information." In the event there is a possibility that any portion cannot be rendered non-hazardous, this amount will be transported to the nearest approved Hazardous Waste Facility. B. This spent waste will then be transported and disposed of by Duval Septic Tank Company, Inc. at their approved land farm, in accordance with their State of Florida Department of Environmental Regulation Operation Permit No. S016-23057. C. The internal manifest will be completed in its entirety with a signed copy mailed to the originating generator. From the foregoing outline, you can see that we are in compliance with all Federal, State and Local regulations, as well as API safety precautions. Sincerely. J.H. Westbury Attachments cc: Mr. Ernest Frey Engineer IV D.E.R. Northeast District RHM/st

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REVISED 2/1/83