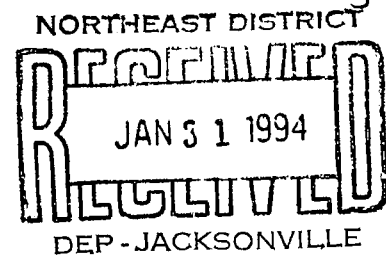


IMAGE QUALITY

AS YOU VIEW THE FOLLOWING
DOCUMENT, PLEASE NOTE THAT
PORTIONS OF THE ORIGINAL WERE OF
POOR QUALITY

C
January 19, 1994



Mike Fitzsimmons
Division of Waste Management
Florida Department of Environmental
Protection - Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32207

RE: Safety-Kleen, Corp., Orange Park Facility H010-209007
Report of Non-Compliance With Transporter Requirements
Facility EPA ID No. FLD 980 847 214
Transporter EPA ID No. ILD 984 908 202

Dear Mike:

In accordance with Specific Condition 8 of the referenced permit, the purpose of this letter is to notify the Florida Department of Environmental Protection (FDEP) of two incidents of non-compliance with transfer facility requirements. These incidents and actions taken to minimize reoccurrence of similar incidents are described below.

Safety-Kleen stored containers of waste dry cleaning separator water (F002) over 10 days. Specifically, one 16 gallon container of separator water from Quality Clnrs in Gainesville remained at the facility from November 11, 1993 to December 21, 1993 (40 days) and one 16 gallon container remained at the facility from November 29, 1993 to December 21, 1993 (22 days).


The reason for these non-compliances was a break down in communications within the branch. Branch management had instructed the warehouse personnel that dry cleaning waste going to the Safety-Kleen facility in Lexington, S.C. should be held until the appropriate South Carolina acceptance number (ARF) was received. ARF's are required for waste that are being terminated at the Lexington location. The waste in question was not being terminated at the Lexington location, but was going on to the Safety-Kleen facility in Denton, OH. and did not require an ARF. The distinction was not noted by the warehouse personnel, and the waste was not transported on time.

DOCKET # 94-2

Warehouse personnel have been retrained, and instructed to inform management of any transfer waste container that is approaching the 10 day storage limit. Additionally, the manifests for transfer waste are now separated from the manifests of waste that is terminated at the Orange Park location.

Your understanding in this regard is appreciated. Should you have any questions, please call me at 813-682-8094.

Sincerely,


William C. Crawford
Environmental Engineer
Florida

cc: Danny Thomas, Quality Clnrs
Ashwin Patel, NE-FDEP
Vicky Valade, NE-FDEP

bc: Della Ridley, EHS-RM, Southeast Region (File IX.c)
Roy Stewart, BM-Orange Park, (EHS 999 file 1290)
Field EHS file IX.c

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. #15982115980	Manifest Document No. 121594		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address QUALITY CLEANERS 1240 NW 76TH BLVD. GAINESVILLE, FL 32605					A. State Manifest Document Number		
4. Generator's Phone (904) 832-7662					B. State Generator's ID		
5. Transporter 1 Company Name SAFETY-KLEEN CORP.			6. US EPA ID Number IL0984908202		C. State Transporter's ID		
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone (904) 264-2607		
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 581 MILLIKEN DRIVE SE HEBRON, OHIO 43025			10. US EPA ID Number OHD980587364		E. State Transporter's ID		
					F. Transporter's Phone		
					G. State Facility's ID		
					H. Facility's Phone 614-929-3532		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers	13. Total Quantity	14. Unit Wt/Vol
a. RM X RO HAZARDOUS WASTE, LIQUID N.O.S. 9 NA3082 PG III (F002) (ERG#31) SEPERATOR WATER					No. Type 1 DF	195	P
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above 640/B755					K. Handling Codes for Wastes Listed Above T03		
15. Special Handling Instructions and Additional Information EMERGENCY RESP# 1(708)888-4660 24 HRS. IF UNDELIVERABLE RETURN TO GENERATOR FOR RECYCLE 3-079-511/68 PP#321594							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name DANNY THOMAS					Signature <i>[Signature]</i>		Date 11/11/93
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name MICHAEL D. NEELY					Signature MICHAEL D. NEELY		Date 11/11/93
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name					Signature		Date
19. Discrepancy Indication Space							
20. Facility Owner/Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name STEPHEN EDWARDS							
Signature <i>[Signature]</i>					Date 1/6/94		

EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

SAFETY-KLEEN CORP.

90290

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Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST1. Generator's US EPA ID No. **FLD982116980** Manifest Document No. **181110**

2. Page 1 of 1 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address **QUALITY CLNRS
1290 NW 76TH BLVD**4. Generator's Phone **904-332-7662** **GAINESVILLE FL 32605**5. Transporter 1 Company Name **SAFETY-KLEEN CORP** 6. US EPA ID Number **FLD051060408**

7. Transporter 2 Company Name 8. US EPA ID Number

9. Designated Facility Name and Site Address **HEBRON RECYCLE
581 MILIKEN DR SE
HEBRON OH 43025** 10. US EPA ID Number **OH D980587364**

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers No. Type 13. Total Quantity 14. Unit Wt/Vol 15. Waste No.

a. **RQ HAZARDOUS WASTE, LIQUID
SEPARATOR WATER NOS. 9NA3082 (F002)** 1 **DF** **195 P.** **F002**

b.

c.

d.

16. Additional Description for Materials Listed Above

17. Special Handling Instructions and Additional Information **3-079-51-1160 DOCUMENT # 81110****IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE****RESP # 1-708-888-4660 24 HR SKROT # A: 506 R: C: D:**

18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **DANNY THOMAS**

Signature

Date **11/12/93**

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name **MICHAEL ANCEH**Signature **MICHAEL ANCEH**

Date

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name **STEPHEN HOWARD** Signature **STEPHEN HOWARD** Date **11/16/93**