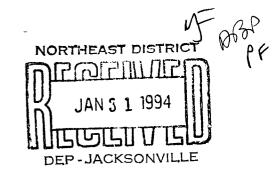
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January 19, 1994



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 HO10-209007 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-compliancies 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.

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

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