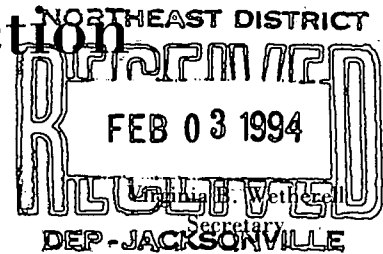




Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



January 27, 1994.

Mr. Carl D. Dworkin
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-5500

Re: Safety-Kleen Family of Companies

Dear Mr. Dworkin:

Your request for information on the referenced company has been forwarded to me for response. Our headquarters office does not maintain a database of the nature which would allow us to be responsive to your request for information about the company. It is suggested that you contact our Department's district offices to obtain any information they have available about the operations of the company in their respective districts. Enclosed is an information sheet which identifies the locations and addresses of the district offices. By copy of this letter, I am forwarding a copy of your letter with attachments to the Waste Management Sections in our district offices for their consideration.

Sincerely,

Thomas W. Conrardy
Bureau of Waste Cleanup

TC/tc

cc: District Waste Program Administrators

DOCKET # 94-3

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-5500
(518) 457-0090 / Facsimile: (518) 457-1088

Bureau of Waste Management

DEC 15 1993

FEB 03 1994

Thomas G. Jorling
Commissioner

Engineering Support Section

December 13, 1993

RECEIVED
DEC - 1993

Department of Environmental Protection
Waste Management Division
2600 Blairstone Road
Tallahassee, Florida 32399-2400

DIVISION OF
WASTE MANAGEMENT

Re: *Safety-Kleen Family of Companies*

Dear Fellow Environmental Regulator:

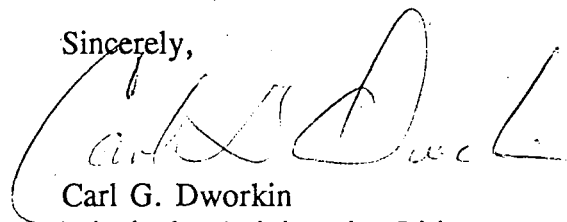
We are presently in the process of considering Safety-Kleen's compliance history as part of our review of permit and other approval actions now pending before us. In order to be sure that we have a complete picture, we are seeking information about the company and others related to it from all State-level jurisdictional agencies.

Enclosed please find a copy of a document, submitted to us by Safety-Kleen in 1992, that purports to show all relevant findings made against the company and its family in recent years, supplemented by EPA's non-compliant facilities list. We would greatly appreciate your reviewing these documents to determine whether there are any adverse-to-Safety-Kleen, *et al.* rulings in Florida by any Florida, local or Federal civil, criminal or (enforcement) administrative tribunal since January 1, 1989. If there are any, please send a copy of the entirety of each such ruling. We would also appreciate your providing the name and telephone number of a person who has been involved in such cases whom we may contact for further information.

Thus far, we are aware of only the company names and principals who might be named in such actions that appear on the attached list; if there are others of whom you are aware please let us know. [We are authorized to consider the compliance history of individuals and other companies with which they have been associated in evaluating applicants.]

Thank you very much for your assistance.

Sincerely,



Carl G. Dworkin
Principal Administrative Litigator

Enclosures

KNOWN SAFETY-KLEEN FAMILY OF COMPANIES

American Recovery Company, Inc.
Booth Oil
Breslau
Breslube USA, Inc.
Buffalo Oil Processing
East Chicago Re-Refinery

Recovery Acquisition Corp.
Safety-Kleen Corp.
Safety-Kleen Canada, Inc.
Safety-Kleen Oil Recovery Co.
Safety-Kleen Oil Services, Inc.
Translube, Inc.

KNOWN SAFETY-KLEEN PRINCIPALS

Baker, Samuel R.
Block, Kenneth L.
Breece, Dr. James
Brigger, William
Brinckman, Donald W.
Bullinger, Roy D.
Burian, Robert J.
Carney, Michael H.
Casbourne, Glenn
Cavill, J.
Chalhoub, Joseph
Dattilo, David A.
Ericson, Burton E.
Farrar, Gary
Farmer, Richard T.
Fore, Scott E.
Gordon, Kenneth R.
Gwillim, Russell A.
Hamlet, Joseph F.
Isanhart, James M.

Jannotta, Edgar D.
Kasko, William P.
Louder, Wallace K.
Marini, Ulisse F.
McAuley, S. Janice
Miller, Marian E.
Otzen, Karl G.
Peel, D.
Phillips, Clyde R.
Potvin, Maureen
Rose, Clark J.
Rudnick, Laurence M.
Rycomb, John
Schofield, Dale
Schofield, Lonsdale
Schrage, Paul D.
Trompke, Ernst
Vranik, Dale T.
Willmschen, Robert W., Jr.
Wood, W. Gordon

ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Dolomite, AL	92-067-HW	Alabama DEM	1. Missing training file. 2. Missing information in files. 3. Missing interal alarm. (11/5/91 Inspection)	Settled \$49,900
Dolomite, AL	92-070-HW	Alabama DEM	1. No documentation of analysis. 2. Failure to inspect and analyze each shipments. 3. Failure to follow the WAP.	Settled \$27,100
Huntsville, AL	92-068-HW	Alabama DEM	1. No documentation of analysis. 2. Improper WAP (11/13/91 Inspection)	Settled \$28,000
Montgomery, AL	92-068-HW	Alabama DEM	1. No documentation of analysis. 2. Improper heater. 3. Inspection records not available. (11/16/91 Inspection)	Settled \$40,000
Whistler, AL	2/22/91	Alabama DEM	Waste Analysis Plan (Whistler, AL)	Resolved Settled \$28,000
Fort Smith, AR	LIS 92 027	AR DPCE	Failure to provide secondary containment and leak protection	Settled — \$3,750 (2/27/92)
Arkansas	LIS 88 039	AR DPCE	Allegedly transported hazardous waste without a permit (August, 1989; Arkansas)	Consent Decree Paid \$10,000 civil penalty
Los Angeles, CA	FO 88/89-334	CA DOHS	1. Dispute regarding the Corrective Action Order (2/3/89)	Settled \$300 paid (3/9/89)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Rancho Cordova, CA	HWCA 91/92-049	CA EPA	1. Dispute regarding the Enforcement Order (4/16/92)	Settled \$10,000 (4/29/92)
Rancho Cordova, CA		CTY APCD	Failure to maintain equipment (2/19/88; Rancho Cordova, CA)	Corrected — \$1,000 penalty paid
California	90/91 197	California Health & Welfare Agency Department of Health Services Toxic Substances Control Program	Allegedly violated Sect. 25187 and 25189.2 of Health & Safety Code (12/6/90; California)	Paid \$600 penalty
Colorado Facilities	89-02-17-01	Colorado DOH	1. Certificate of Insurance; 2. Financial assurance (1/10/89; Colorado facilities)	Settled \$3,375 paid (6/27/89)
Brandford, CT	TSCA-1-90-1053	CT DEP	TSCA violation suit 3/30/90	Settled — \$109,000 (7/16/91)
West Hartford, CT	HM-547	CT DEP	Alleged violations of TSD standards (1988; West Hartford, CT)	Compliance order entered 10/17/88
Connecticut	HM-344	CT DEP	Alleged noncompliance with manifesting procedures (7/21/86; Connecticut)	Compliance order 7/21/86 Amended 5/26/88
Altamonte Springs, FL	89-19-R	FL DER	1. Contingency Plan; 2. Closure cost estimates; 3. Post closure plan (7/25/88; Altamonte Springs, FL)	Resolved on 3/7/90 \$8,000 penalty paid
Altamonte Springs, FL		USEPA Region IV	RFI work plan (11/89; Altamonte Springs, FL)	Consent Decree entered 4/10/90 \$5,000 penalty paid

ATTACHMENT C.2

SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Altamonte Springs, FL	91-07-12	USEPA, Region IV	Failure to file timely closure plan	Settled — \$74,620 (11/91)
Delray Beach, FL Miami	88-0473	FL DER	1. Nov. issued 6/6/88	Settled \$23,250 paid (4/10/89)
Delray Beach, FL Miami	87-0130	FL DER	1. Nov. issued 2/12/87	Settled \$3,049 paid (7/7/87)
Florida	92-0644	FL DER	1. Violations of management and disposal of HazWaste.	Settled \$17,450 (12/7/90)
Miami, FL	OCG #91-0187	FL DER	Notice of violations	Settled — \$6,750 (10/91)
Orange Park, FL	88-0632	FL DER	Secondary containment (12/4/87; Orange Park, FL)	Corrected, paid \$2,305.23 (11/23/88)
Port Charlotte, FL	90-0782	FL DER	1. Violations of hazwaste management.	Settled \$4,750 (8/18/90)
Port Charlotte, FL	90-0092	FL DER	1. Manifest; 2. 50-ft. setback (1/13/89; Port Charlotte)	Settled \$9,250 paid (3/6/90)
Port Charlotte, FL		FL DER	1. Exceeding permitted container storage limit; 2. High level alarm not functioning; 3. Bolt missing for tank anchor; 4. Failure to submit permit renewal app. 90 days; 5. Tank integrity assessment; 6. LDR (boxes not checked) (Port Charlotte, FL)	Settled — \$12,250 (10/91)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Tallahassee, FL	OGC #90-0017	FL DER Central District	Closure deficiencies (10/21/88; Tallahassee, FL)	Consent Order signed 3/7/90 Safety-Kleen paid \$8,000 penn
Tallahassee, FL	89-1518	FL DER	1. Tested tank using air instead of water.	Settled \$3,250
Tallahassee, FL	FI 88-0472	FL DER	1. Various violations of RCRA Haz Waste Rules (4/26/88)	Settled \$3,400 (6/25/88)
Tallahassee, FL	89-0750	FL DER	1. Contingency Plan; 2. Manifest; 3. Personnel training (11/2/89; Tallahassee, FL)	\$2,483.74 paid
Tampa, FL	88-1133	Florida DER	1. Failed to comply with conditions of closure.	Settled \$12,450 paid (4/26/89)
Tampa, FL	OCG 90-1637	FL DER	1. Container storage area; 2. PE assessment; 3. Ancillary equipment issues; 4. Certifying tank system; 5. Containment volume; 6. Designed to minimize unplanned release (Tampa, FL)	Settled — \$30,500 (7/91)
Florida		Lake Worth Fire Dept.	3 gallons of mineral spirits spilled (10/22/90 Lake Worth, FL)	Paid \$100 mitigation fee
Norcross, GA	EPD-HW-687	GA EPD	1. Improper signing manifests.	Settled — \$50,000 (12/91)

ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Norcross, GA	EPD-HW-660	GA EPD	Release of hazardous waste	Settled — \$50,000 (8/91)
Hapeville, GA	EPD-HW-510	GA DNR	Alleged failure to submit complete permit application (9/29/89, Hapeville, Georgia)	Executed consent order on 9/29 \$20,000 penalty paid
Macon, GA	EPD-HW-471	GA DNR	1. Dumpster not registered as a tank; 2. Part A modifications; 3. Alleged soil contamination; 4. Storage in an uncertified tank; 5. Tank assessment; 6. Waste Analysis Plan (8/30/88; Macon, GA)	Corrected 1/23/89 paid \$12,500
Macon, GA	EPD-HW-471	GA EPA	1. Inspection checklist; 2. Tank certification; 3. Waste analysis (1/23/89; Macon, GA)	Settled; paid \$12,500
Morrow, GA Facility	DNR-EPD-HW-AH-6-90	GA DNR	Class 1 and 2 permit modification under RCRA regulations	Consent agreement executed 3/7/91
Boise, ID		Idaho DHW	Alleged paperwork violations (1/22/87); Boise, ID)	Corrected; paid \$6,600 (7/11) (includes Pacatello)
Pocatello, ID	39-4413	Idaho DHW	1. Contingency Plan; 2. Inadequate inspections; 3. Manifesting; 4. Operating record; 5. Training (3/11/87; Pocatello, ID)	Settled paid \$6,600 (6/14/88) Paid \$6,600 7/13/88 Corrected (includes Boise)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Elgin, IL	V-W-89-R-10	USEPA, Region V	Permit status of USTs (5/30/89; Illinois)	Executed Consent Order, 1/19/90 Paid \$55,000 penalty
Illinois, Safety-Kleen Oil Services, Inc.	CP 900255 (TCM)	Illinois Department of Transportation	Alleged violation of hazardous materials transportation regulations (8/6/90; Illinois)	Consent Decree signed Paid \$1,800 on 8/9/90
Indianapolis, IN		IDEM	1. 50-ft. setback; 2. Storage (FRS) without permit (6/28/90; Indianapolis, IN)	Agreed Order 9/4/90; No penalty assessed
Indiana		IDEM	Transportation of liquid industrial waste outside the scope of company's waste hauling permit report (3/22/83; Indiana)	Deficiencies corrected Permit extended Fine paid
Davenport, IA	VII-90-N-0017	USEPA, Region VII	1. Alleged failure to properly maintain personnel training records; 2. Failure to perform waste analysis at frequency specified in facility's Waste Analysis Plan (4/4/90; Iowa)	Consent Order entered 1/8/91 Paid \$2,625 penalty Resolved all prior NOVs
Grimes, IA	VII-90-H-0016	USEPA, Region VII	1. Alleged failure to properly maintain personnel and inspection records; 2. Adequate aisle space; 3. Locate ignitable hazardous waste at least 15 meters from facility's property line; 4. Store hazardous waste properly; 5. Maintain copy of Biennial report at the facility	Consent Order entered 1/8/91 Paid \$15,881.25 penalty Resolved all prior NOVs

ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Mason City, IA	VII-90-H-0018	USEPA, Region VII	<ol style="list-style-type: none"> 1. Alleged failure to properly maintain personnel and inspection records; 2. Locate ignitable hazardous waste at least 15 meters from property line; 3. Control entry; 4. Complete and maintain hazardous waste manifests; 5. Maintain proper notifications and have at least one employee on premises or on call (4/4/90; Iowa) 	Consent Order entered 1/8/91 Paid \$17,625 penalty Resolved all prior NOV's
Dodge City, KS	86-E-143	Kansas DHE	Alleged paperwork violations (11/4/86; Dodge City, KS)	Corrected; \$3,000 penalty paid
Dodge City, KS		Kansas DHE	Alleged failure to submit revised tank assessment (4/12/90; Dodge City, KS)	Order entered 7/10/90
Edwardsville, KS	86-E-138	Kansas DHE	Alleged paperwork violation (11/4/86; Edwardsville, KS)	Corrected; \$5,000 penalty paid
Edwardsville, KS	87-E-23	Kansas DHE	Allegedly improper container management and various paperwork violations (4/17/87; Edwardsville, KS)	Corrected — \$6,500 penalty
Wichita, KS	87-E-19	Kansas DHE	<ol style="list-style-type: none"> 1. Labeling; 2. Manifesting; 3. Warning signs (4/7/87; Wichita, KS)	Corrected; \$5,000 penalty paid
Ashland, KY	89-101	Kentucky DEP	Failure to register activity (11/88; Ashland, KY)	Agreed Order filed 5/25/90 \$5,000 penalty paid

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Kentucky	90-016	Jefferson County Air Pollution Control District	1. Reclamation Center w/o permit.	Settled \$1,000 (1/10/90)
Ashland, KY		Kentucky DEP	Closure deficiencies (7/88; Ashland, KY)	Resolved by Consent Agreement Entered in civil suit
Lexington, KY		Kentucky DEP	Allegedly transporting waste without Generator ID # (9/18/87; Lexington, KY)	Kentucky DEP issued \$1,000 penalty
Louisville, KY		Kentucky DEP	Records deficiencies (5/25/88)	Agreed Order 11/23/88 Penalty paid
Louisville, KY		Kentucky DEP	Facility Annual Report (5/25/88)	Settled \$2000 (1/3/89)
New Castle, KY		Kentucky DEP	Annual waste registration (1/20/89; New Castle, KY)	Consent Decree entered \$3,000 penalty paid
Kentucky — All Branches		Kentucky DEP	Errors on 1985 Annual Reports (12/8/86; Kentucky — All Branches)	\$300.00 fine paid
Leeds, ME		Maine DEP	1. Alleged paperwork and operational deficiencies; 2. Cracks in concrete (1/26/90; Leeds, ME)	Order entered 5/4/90
Leeds, ME		Maine DEP	General compliance issues prior to 1987 (Leeds, MA)	Resolved by Consent Agreement 4/8/87 which grants facility interim status

ATTACHMENT C.2

SAFETY-KLEEN CORPORATION ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Leeds, ME		Maine DEP	1. Alleged failure to properly label hazardous; 2. Failure to keep daily logs of inspections; 3. Failure to keep daily logs of inspections; 4. Failure to maintain personnel training records and location of all records (Leeds, ME)	Administrative Consent Agreement and Enforcement Order entered 2/28/91 — Paid \$35,000 penalty
Baltimore, MD	C-88-63	Maryland Dept. of Health and Mental Hygiene	Liner bags in dumpster (2/28/88; Baltimore, MD)	Penalty paid \$2,000
Maryland	CO-89-039	Maryland Dept. of the Environment	1. Improper transportation of hazwaste.	Settled \$2,500 (10/16/88)
Silver Springs, MD	CO-87-241	Maryland Dept. of the Environment	1. Spills from facility high level alarm.	Settled \$2,500 (1/6/87)
Silver Springs, MD	CO-90-103	Maryland Dept. of Natural Resources	Alleged spills (1/5/90; Silver Springs, MD)	\$4,500 penalty paid
Maryland — All Branches		Maryland Dept. of Health and Mental Hygiene	Allegedly operating three branches without proper permitting (1986; Maryland — All Branches)	Resolved by Consent Agreement 6/13/86 Paid \$20,000
Massachusetts (All Region I Sites)	RCRA #1-90-1109	USEPA, Region I	Land ban requirements (Massachusetts)	Settled — \$100,000 (6/91)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Bridgewater, MA		Massachusetts DEQE	1. Closure cost estimate; 2. Drum and storage tank labeling; 3. Manifest; 4. Operating procedures; 5. Overfilling controls; 6. Sign posting and fencing; 7. Personnel training and records (3/17/88; Bridgewater, MA)	Resolved — 4 sites Consent Order 6/8/90
Bridgewater, MA		Massachusetts DEQE	1. Drum labeling; 2. Manifests; 3. Notification requirement; 4. Overfilling controls; 5. Personnel training; 6. Truck equipment; 7. Waste analysis records; (1/24/89; Bridgewater, MA)	Resolved — 4 sites Consent Order 6/8/90
Salisbury, MA	AP-SE-87-805	Massachusetts DEQE	R-T-K violations (9/17/87; Salisbury, MA)	Corrected; paid \$5,000 (6/1/88)
Salisbury, MA	AP-BOS-90-001	Massachusetts DEQE	1. Security; 2. Failure to notify department of license mods; 3. Aisle space; 4. Labeling (4/20/90; Salisbury, MA)	Resolved in 7/3/90 by Agreed Order Paid \$125,000 penalty Five month suspension
Salisbury, MA		Massachusetts DEP	1. Documentation of Contingency Plan; 2. Drum labeling; 3. Sign posting (2/15/89; Salisbury, MA)	Resolved (as part of AP-BOS-90-001)

ATTACHMENT C.2

SAFETY-KLEEN CORPORATION ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Massachusetts (4 Facilities)	AP-BOS-90-003	Massachusetts DEQE	1. Manifest violations; 2. Employee training violations; 3. Failure to maintain records; 4. Failure to submit closure plan and costs	Executed Consent Order (6/8/90) Penalty paid — \$25,000
Massachusetts (4 Facilities)	HW-86-30	Massachusetts DEQE	Covering general compliance issues; NOVs for 1985-86; All Massachusetts facilities	Consent Decree entered 1/15/87 \$40,000 penalty paid
Massachusetts (4 Facilities)	HW-84-7	Massachusetts DEQE	Allegedly operating facilities without a license	Consent Order entered 11/84 Applications submitted
Michigan	90-65776-CE	MDNR	1. Manifest errors.	\$2,700 paid
Mason, MI	WMD 64-04-89	Michigan DNR	Late submittal of revised permit application (4/28/89; Michigan)	Consent Order dated 6/1/89 Paid \$5,000 penalty
Pontiac, MI	WMD 64-03-89	Michigan DNR	Late submittal of revised permit application	Executed Consent Order dated (6/1/89) — Paid \$5,000 fine
Saginaw, MI	WMD 64-04-90	Michigan DNR	Allegedly deficient operating license application (4/11/90; Saginaw, MI)	Resolved on 5/23/90 Revised license Paid \$27,000 fine
Michigan	TSCA-V-C-63-90	USEPA, Region V	Allegedly distributing in commerce, for export, a shipment of PCB contaminated oil, without having obtained an exemption (5/22/90; Michigan)	Consent agreement dated 1/22/91 Implemented PCB testing program Paid penalty of \$16,000

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Cloquet, MN		Minnesota PCA	Tank or piping leak caused soil contamination (6/24/86; Cloquet, MN)	\$28,000 penalty Closure of tanks and implementation of remedial action plan
Minnesota (3 Facilities)		Minnesota PCA	Alleged manifesting violations	Stipulated Agreement entered 10/90 \$92,500 fine paid
Eagan, MN		Minnesota PCA	1. Waste Analysis Plan — antifreeze and TCLP 2. Drum in tank area 3. Spill reporting 4. Manifest violations (Eagan, MN)	Settled — \$3,610 (4/24/92)
Gering, NE		Nebraska DEC	Failure to institute waste analysis plan 2/4/92	Settled — \$20,056 (5/15/92)
Grand Island, NE		Nebraska DEC	Preliminary tank assessment, annual leak tests, detection of release of hazardous waste to environment (10/9/90; Nebraska)	Executed Consent Decree Paid \$60,056 civil penalty
Grand Island, NE		Nebraska DEC	1. Emergency communication device; 2. Operating record; 3. Security (9/1/88; Grand Island, NE)	Consent Decree entered 9/89 \$5,056 penalty paid
Omaha, NE		Nebraska DEC	Overfill release 5/92	Settled — \$5,056
Boundbrook	EHW 02038-91	NJ DEP	Abandoned tanker truck (by prior owner of SRSNJ)	Settled — \$5,600 (5/12/92)
New Jersey		NJ DEP	Alleged improper storage of hazardous waste (by prior owner of SRSNJ)	Settled

ATTACHMENT C.2

SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
New Jersey		NJ DEP	1. Improper delivery of hazwaste.	Settled \$7,500 paid (9/9/91)
New Jersey		NJ DEP	1. Improper safety equipment. 2. Improper transportation of hazwaste. 3. No emergency telephone number.	Settled \$2,000 paid (9/16/91)
Bound Brook, NJ		NJ DEP	Inadequate manifesting (4/3/87; Bound Brook, NJ)	Paid fine
Clayton, NJ		NJ DEP	Spill occurring on 1/3/84 (3/19/84; Clayton, NJ)	\$1,625 penalty paid
Clayton, NJ		NJ DEP	Alleged acceptance of a hazardous waste shipment from an unlicensed transporter (10/19/84; Clayton, NJ)	\$775 penalty paid
Clayton, NJ RC		NJ DEP	Alleged use of unlicensed hazardous waste transporter (8/31/84; Clayton, NJ RC)	\$875 penalty paid
Clayton, NJ	HWM91-0073	NJ DEP	Improper handling of PCBs (2/9/92)	Settled 5/1/92
Linden, NJ	HWM050-90	NJ DEP	Improper storage of hazardous waste	Order entered 5/1/92 — \$5,600
Linden RC, NJ	#WP116a-88	NY DEC	Failure to insert information into manifest (12/11/90; New York)	Resolved Paid \$1,000 civil penalty
Vincentown, NJ		NJ DEP	Contingency Plan (5/1/87; Vincentown, NJ)	Paid fine
Vincentown, NJ		USEPA	1. Land ban notification; 2. Waste Analysis Plan (6/24/88; Vincentown, NJ)	Resolved — \$2,700 fine paid

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Vincentown, NJ		NJ DEP	Spill occurred on 1/18/83 (4/5/83; Vincentown, NJ)	DEP notified — spill cleaned up on 1/19/83 — \$100 penalty paid
Avon, NY	8-0522	NY DEC	1. Manifest violation from Avon to Hebron, OH.	Settled \$4,000 paid (2/18/86)
New York	BU-050-89	NY DEC	1. Accepted waste with incomplete manifest.	Settled \$1,500 (7/11/89)
Avon, NY		NY DEC	Inadequate manifest copy distribution (5/19/87; Avon, NY)	Paid \$250 fine
Congers, NY	WP 076-86	NY DEC	1. Manifest irregularities (4/30/86).	Settled \$1,000 paid (1/5/87)
Congers, NY	CE-0001-87-04	NY DEC	1. No "No Smoking" signs; 2. Leading Drum; 3. Inadequate aisle space; 4. No weekly inspections; 5. Inadequate manifests; 6. No closure cost estimate.	Settled \$4,500 paid (10/22/87)
Congers, NY	WP-028-86	NY DEC	1. Accepted waste with improper manifest. (8/6/85)	Settled \$2,500 paid (6/11/86)
Congers, NY	C3-8164-91-03	NY DEC	1. No "No Smoking" signs; 2. Tanks not properly labeled; 3. Leak tests not performed; 4. No post closure plan submitted with permit (3/5/91; New York)	Consent Order entered 5/91 Paid \$3,000 penalty



ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Latham, NY	R4-0504-87-09	NY DEC	SPDES application incomplete(10/23/87; Latham, NY)	Paid \$1,000 fine
Latham, NY	R4-0652-89-03	NY DEC	Alleged discharge of mineral spirits	Consent Decree entered 1/90 \$70,000 penalty of which \$57,500 was suspended provided corrective action is completed
Lackawanna, NY	C9-6541-91-03	NY DEC	Alleged failure to properly report tank spill	Settled \$2,500
Mattydale, NY		New York State Police	Improper shipping papers (7/17/87; Mattydale, NY)	Fine paid
Mattydale, NY		USDOT	DOT citation (1987; Mattydale, NY)	Resolved 10/87
Mattydale, NY		NY DEC	Mineral spirits spill (9/5/84; Mattydale, NY)	Clean-up completed, \$250 fine paid
Mattydale, NY	#C7-0001-90-03	NY DEC	Alleged tank closure deficiencies	Consent Order entered 6/4/90 Paid \$25,000 penalty
Syracuse, NY (SK Oil Services, Inc.)	R7-0088-86-03	NY DEC	Alleged violations of permit regulations and failure to perform all closure activities (Syracuse, New York)	Consent Order executed 10/15/90 Compliance with site closure and remediation schedule Paid \$125,000 penalty \$50,000 suspended if SK complies
Waverly, NY		New York State Police	Failure to properly display transporter permit and failure to carry valid transporter license certificate (3/2/83; Waverly, NY)	Corrected -- fine paid

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
White Plains, NY		New York State Police	Route truck transporting without proper vehicle registration (9/28/81; White Plains, NY)	All vehicles registered, fine paid
Woodside, NY	#E069860268	NY City	Violated sanitation regulations (7/12/90; New York)	Resolved
Woodside, NY		NY DEC	1. Fire resistance rating of storage areas; 2. Written statement from fire insurance company; 3. 50-ft. setback (12/13/90; Woodside, NY)	Resolved
New York	R8-0002-89-10	NY DEC	1. Manifest violations.	Settled \$2,000 paid (2/15/90)
New York		New York State Police	Allegedly transporting hazardous waste without a license (6/05/81; New York)	\$500 fine paid
New York		New York State Police	Alleged improper hazardous waste transporter identification (9/9/82; New York)	Properly licensed vehicle used Fine paid
New York		State Police	1. Uninspected motor vehicle; 2. Unsecured load (6/23/87; N. Amityville, NY)	Paid \$400 fine
New York		State Police	1. Citation for unregistered waste hauler vehicle; 2. Failure to display Environmental Control Reg. No. (3/10/82; Orangeburg, NY)	Citation dropped; Registration number displayed — Fine paid
New York (All Sites)	RCRA C2-007-12-87	NY DEC	Omissions or discrepancies on hazardous waste manifests (New York)	Consent Order executed 4/25/88 Paid \$22,500 penalty
Charlotte, NC		NC DHR	Manifest violations 3/91 inspection	Settled — \$2,000 (10/7/91)

ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Hebron, OH	Docket No. V-W-82-R-002	USEPA	Late filing of notification of hazardous waste activity (7/23/82; Hebron, OH)	Consent Agreement entered providing for interim status and expansion
Hebron, OH	USEPA #V-W-88-C-130	USEPA Region I	Fire and consequent spills (11/27/85 and 11/28/85; Ohio)	Administrative Order on Consent dated 3/16/89
Hebron, OH	USEPA #V-W-85-R-070	USEPA Region I	Hazardous Waste Management Violations	Settled \$9,900 (7/23/85)
Kent, OH	EBR-502004-502005	Ohio EPA	Alleged violations of regulations pertaining to: 1. Job descriptions; 2. Warning signs; 3. Operating records; 4. Closure plan; 5. Waste sampling (Oregon, OH)	Resolved
Oregon, OH	89-088	Ohio EPA	1. Closure activities were not completed within 180 days of approval of closure plan; 2. Storage tanks were not fully decontaminated before disposing off-site (2/12/88; Ohio)	Agreed Director's Final Findings entered 7/19/89 — \$8,800 penalty paid
Sharonville, OH		Ohio EPA	1. Aisle space; 2. Personnel training (Sharonville, OH)	Resolved
Tallmadge, OH	89-087	Ohio OEPA	1. Closure activities were not completed within 180 days of approval of closure plan; 2. Storage tanks were not fully decontaminated before disposing off-site (2/12/88; Tallmadge, OH)	Agreed Director's Final Findings entered 7/19/89 — \$13,200 penalty paid

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Tipp City, OH		Ohio EPA	<ol style="list-style-type: none"> 1. Inspection log; 2. Container storage; 3. Aisle space; 4. Leak detection system; 5. Secondary containment; 6. High level alarm; 7. Personnel training; 8. Operating permit for wet dumpster (Tipp City, OH) 	Resolved
Toledo, OH		Ohio EPA	Failure to notify of unexpected event (Toledo, OH)	
Toledo, OH		Ohio EPA	<ol style="list-style-type: none"> 1. Closure Plan; 2. Hazardous waste label; 3. High level alarms; 4. Inspections; 5. Statements from personnel; 6. Waste treated in wet dumpster; 7. Wet dumpster permit; 8. Written tank assessment (Toledo, OH) 	Resolved
Warrensville, OH	89-089	Ohio EPA	<p>Alleged violations:</p> <ol style="list-style-type: none"> 1. 50-ft. setback requirements; 2. Inadequate aisle space; 3. Job descriptions lacking; 4. Failure to have internal emergency alarm system (all per 11/30/87 NOV; Warrensville, OH) 	Agreed Director's Final Findings entered 7/19/89

ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Youngstown, OH	EBR-502004-502005	Ohio EPA	Alleged violations of regulations pertaining to: 1. Fire incident reports; 2. Contamination evaluation; 3. Remedy discharge valve; 5. Closure plan; 6. Closure cost estimates; 7. Operating permit for wet dumpster; 8. Manifests; 9. Annual retraining of personnel; 10. Warning signs; 11. Daily tank inspections (Youngstown, OH)	Resolved
Youngstown, OH		Ohio EPA	1. Personnel training; 2. Job description; 3. Contingency Plan; 4. Manifests (Youngstown, OH)	Resolved
Clackamas, OR		Oregon DEQ	1. Security; 2. Tank assessment; 3. Waste analysis (6/13/89; Clackamas, OR)	Corrected, \$5,800 penalty paid
Oregon	HW-WVR-91-109	Oregon DEQ	1. 8/28/91 NOV	Settled \$2,900 (11/13/91)
Oregon	MM820	Public Utility Comm., Salem, OR	Violations for drivers' failing to record their duty status (11/29/88; Oregon)	Order #90-1432 dated 4/12/89 \$2,000 penalty paid

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Oregon	MM821	Public Utility Comm., Salem, OR	1. Failed to have 3 persons medically certified as physically qualified to operate a motor vehicle; 2. Failed to require several of its drivers to record their duty status (11/2/9/88; Oregon)	Order dated 4/12/89 \$1,500 penalty paid
Oregon	MM1201	Public Utility Comm., Salem, OR	1. Alleged violations	Settled \$1,200 (9/26/90)
Pennsylvania		Pennsylvania DER	1. Manifest incomplete no "total quantity".	Settled \$300 paid (4/22/86)
Pennsylvania	89-291-MJ	Pennsylvania DER	1. Inadequate manifests between 9/85 - 8/88. (8/21/90)	Settled \$20,000 video tape funded (9/5/90)
Clairton, PA	#89-278-MJ	Pennsylvania DER	Detection of solvents in groundwater (7/19/89; Pennsylvania)	Consent Order executed 9/12/90 Ordered Phase II Site Evaluation & Assessment Plan, Phase III Remediation Plan
Erie, PA		Pennsylvania DER	1. Manifest records incomplete.	Settled \$6,000 paid (11/4/85)
Erie, PA		Pennsylvania DER	1. Contingency Plan; 2. Failure to report spill; 3. Improper storage; 4. Inspection records; 5. Lack of labeling; 6. Manifest error (6/27/86; Erie, PA)	Consent Decree



ATTACHMENT C.2

**SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS**

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Erie, PA		NY DEC	Manifests (6/30/89; Erie, PA)	Resolved 10/5/89, \$1,500 penalty paid
Erie, PA		Pennsylvania DER	Various operational deficiencies (1/9/84; Erie, PA)	Compliance activities undertaken \$500 fine paid
New Kingstown, PA		Pennsylvania DER	Collecting hazardous waste (used oil) without permits (3/9/90; New Kingstown, PA)	Consent Order 8/7/90 \$5,000 penalty paid
New Kingstown, PA		Pennsylvania DER	Alleged failure to sample neighbors offsite drinking water in accordance with State law (New Kingstown, PA)	Settled — \$10,000 (5/24/91)
Erie, PA		Pennsylvania DER	1. Improperly labeled drums. 2. Missing information in PPC plan.	Settled \$850 (1/13/87)
Tullytown, PA		Pennsylvania DER	1. Labeling; 2. Records; 3. Manifest regulations (6/13/83; Tullytown, PA)	Corrected — fine paid
Wilkes-Barre, PA	90-166 & 90-167	Pennsylvania DER	Quarterly Reporting (7/26/90; Wilkes-Barre, PA)	Settled \$10,000 & \$500 (8/15/90)
Lexington, SC	85-____-SW	SC DHEC	1. Failure to update financial test.	Settled \$1,500 paid (6/5/85)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Lexington RC, SC	Consent Order #90-79-SW	SC DHEC	Violations regarding: 1. Incorrect labeling; 2. Marking containers; 3. Job titles and descriptions; 4. Missing signs (2/8/90; South Carolina)	Consent Order executed 11/15/90 Paid penalty of \$14,480
Lexington, SC Recycle Center		SC DHEC	1. Failure to manifest and report; 2. Failure to dispose at permitted facility (5/27/83; Lexington, SC Recycle Center)	Corrected, fine paid
Lexington, SC		SC DHEC	Tank relocation without proper notification (12/15/89; Lexington, SC)	Resolved by Consent Decree 90-79-SW
Lexington, SC		SC DHEC	1. Manifest issues; 2. On-site record sufficiency; 3. Warning signs; 4. Site security; 5. Labeling of tanks; 6. General operating requirements 3/20/90; Lexington, SC)	Resolved by Consent Decree 90-79-SW
St. Paul, SC	91-55-SW	SC DHEC	1. Improper transportation of hazwaste.	Settled \$2,000 (10/8/91)
Summerville, SC		SC DHEC	Manifest violations 7/29/91	Settled — \$13,400 (10/29/91)
South Dakota		SD DENR	1. Transportation of hazwaste without a manifest (7/31/90)	Settled \$1,861.50 (7/2/91)

ATTACHMENT C.2

SAFETY-KLEEN CORPORATION ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Knoxville, TN	17.27-D-88-0013A	TDHE	Violations set forth in Director's Orders dated 9/11/87 (Tennessee)	Agreed Order entered 6/88 Paid \$450.41 in damages and civil penalty of \$5,000 Resolved
Knoxville, TN		TDHE	1. Hazardous waste; 2. Manifest; 3. Submit report with 15 days	Resolved
Knoxville, TN		TDHE	Improper waste storage	Resolved
Denton, TX		Texas Water Commission	RCRA compliance	Settled — \$860 (5/2/89)
El Paso, TX		Texas Water Commission	RCRA violations	Settled \$9,840 (9/18/91)
El Paso, TX	Registration 6309	Texas Water Commission	Alleged manifesting violation (El Paso, TX)	Settled — \$9,840 (10/10/91)
Longview, TX		Texas Water Commission	1. Unauthorized discharge; 2. 50-ft. setback; 3. Waste storage violations (Observed 5/87; Longview, TX)	Agreed Order entered 11/88 \$4,500 penalty paid
Lubbock, TX	N/A	Texas Water Commission	1. Failure to provide adequate secondary containment in solvent storage tank; 2. Failure to maintain inspection logs; 3. Deficient Contingency Plan (11/18/88; Lubbock, TX)	Agreed Order entered 7/3/89 Administrative penalty of \$5,060 paid
Salt Lake City, UT	8906745	Utah DOH	1. Violations of Part B.	Settled \$16,000 paid (5/1/90)

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSITION/ SANCTION IMPOSED *
Salt Lake City, UT	3/29/91	Utah DOH	1. Alleged paperwork deficiencies; 2. WAP procedures; 3. Inspection list; 4. Annual tank test; 5. Manifest submittals (timeliness); 6. Operating log sufficiency	Resolved \$140,000
Barre, VT		Vermont District Court	Improperly maintained containers (5/9/86; Barre, VT)	Fine \$750.00, paid 3/23/87
Barre, VT		Vermont ANR	1. Inaccurate inventory. 2. Emergency coordinator not available. (6/5/91)	Settled \$5,750 (3/2/92)
Fairmont, WV	HW-238-90	West Virginia DNR	1. Incomplete inspection logs; 2. Failure to maintain annual reports; 3. Failure to maintain personnel training records; 4. Failure to maintain adequate aisle space; 5. Stored hazardous waste without a permit (Fairmont, WV)	Resolved by Consent Decree with Wheeling and Nitro NOV's, paid \$57,500 in combined penalties
Nitro, WV	HW-238-90	West Virginia DNR	1. Job titles or names for personnel in hazardous waste management; 2. List of emergency equipment (Nitro, WV)	Resolved See penalties paid for the Fairmont facility above
Nitro, WV		West Virginia DNR	1. Record/maintain waste analyses results in operation log; 2. 50-ft. property line; 3. Develop/follow a written analysis plan (2/9/90; Nitro, WV)	Resolved as part of HW-238-90

ATTACHMENT C.2
SAFETY-KLEEN CORPORATION
ADMINISTRATIVE ENFORCEMENT ACTIONS

FACILITY	DOCKET/ID#	AGENCY OR TRIBUNAL ISSUING ACTION	DESCRIPTION OF ALLEGED VIOLATION	DISPOSTION/ SANCTION IMPOSED *
Nitro, WV		West Virginia DNR	1. Operating record; 2. 50-ft. setback; 3. Waste Analysis Plan (3/28/90; Nitro, WV)	Resolved as part of HW-238-90
Wheeling, WV	HW-238-90	West Virginia DNR	1. Surveillance system and barriers to control unauthorized entry; 2. Incomplete inspection logs; 3. Operating records; 4. Manifest numbers duplicated; 5. Contingency Plan not up to date (Wheeling, WV)	Resolved Resolved, see discussion under Fairmont facility above
Wisconsin Branches		Wisconsin DNR Stipulation Agreement	1. Allegedly operating without permit; 2. Interim status question (10/28/86; Wisconsin Branches)	Paid \$28,750 penalty Submitted Part B application

* - Unless otherwise noted, the item on this Attachment C.3 are all written notices of violation, and have all been resolved by Safety-Kleen Corp.'s response, or by agreement of Safety-Kleen Corp. and the relevant Agency, without any finding or determination of liability on the part of the company.

This Attachment includes most, but not necessarily all, of the past notices of violations that have been resolved. The records may not be complete for the period prior to July 5, 1985, when the vast majority of the company's facilities first became subject to federal regulation. Additionally, this Attachment does not include notices of citation for facilities acquired by Safety-Kleen Corp. from others for the period those facilities operated prior to their acquisition by Safety-Kleen Corp.

ATTACHMENT D.2

**SAFETY-KLEEN CORPORATION
CIVIL SUITS**

TITLE OF CASE	DOCKET NUMBER	NAME AND LOCATION OF COURT	NATURE OF SUITE OR ALLEGED VIOLATION	DATE OF JUDGEMENT	DISPOSITION
Lee Smith v. Safety-Kleen Corp., et al.	D66051	Fulton Co. Court Atlanta, Georgia	Slander	9/28/90	Jury verdict on appeal
USA v. Resource Conservation & Recovery of America, Inc., et al.	4:89 CV-239RLV	U.S.D.C. Northern District of Georgia Rome Division	Superfund — Davis Farm Chatsworth, Georgia	1/10/90	Consent Decree, Safety-Kleen paid \$5,248.45 to reimburse Superfund for cleanup costs
Dept. of Environmental Quality Engineering v. Safety-Kleen Corp.	87-1284	Commonwealth of Massachusetts Superior Court Suffolk County	Alleged violation of Massachusetts environmental laws and regulations	Jan-91	Executed Consent Decree \$100,000 penalty paid
California vs. Safety-Kleen Corp.	679722-1	Superior Court of the State of California for the County of Alameda	Alleged violations pertaining to facility operations and paperwork at ten branch facilities in California covering the period 1989-1991	1988	Agreed settlement — SK paid \$1.3 million
People (Calif. DOHS) v. Safety-Kleen Corp.	919271	California Superior Court County of San Francisco	Alleged violations pertaining to facility operations, paperwork, permit status and/or closure requirements for seven (7) California facilities	5/11/90	Agreed settlement and order SK paid \$405,000 in civil penalties, and received \$320,000 credit for implementing a series of seminars on hazardous waste
Kentucky Natural Resources and Environmental Protection Cabinet v. Safety-Kleen Corp.	Civil Action #89-C1-0504	Franklin Circuit Court Kentucky	Alleged soil contamination and deficient closure activities	4/17/89	Agreed Order, various remedial actions to be taken, \$25,000 civil penalty
Regina v. Bd. of Governors of of the Canadore College and Safety-Kleen Canada, Inc.	N/A	Provincial-Offences Court Province of Ontario Ontario Court of Justice	Possession of waste without generator completed manifest	Notice of appeal quashed 3/27/91	Charges dismissed

ATTACHMENT D.2
SAFETY-KLEEN CORPORATION
CIVIL SUITS

TITLE OF CASE	DOCKET NUMBER	NAME AND LOCATION OF COURT	NATURE OF SUITE OR ALLEGED VIOLATION	DATE OF JUDGEMENT	DISPOSITION
USA v. BASF Corp., et al.	89-CV-71180-DT	U.S.D.C. of Michigan Southern Division	Superfund action at Liquid Disposal, Inc. in Michigan	Consent Decree approved 12/20/89	SK paid \$1,500 pursuant to Consent Decree
USA v. Petroleum Products Corp., et al.		U.S.D.C. Southern District of Florida, Miami Division	Superfund action at Petroleum Products, Hollywood, Florida	3/91 signed Consent Decree	SK paid \$18,133.33 pursuant to Consent Decree
USA v. Seymour Recycling Corp., et al.	IP 80-457-C	U.S.D.C. Southern District of Indiana, Indianapolis Div.	Superfund action in Seymour, Indiana	1988 Consent Decree	SK paid \$54,687 on behalf of Safety-Kleen Corp. and Phillips Mfg. pursuant to Consent Decree
Standard Equipment Inc., et al. v. The Boring Co., et al.	#84-2-15620	Superior Court of Washington for King County	State Superfund action in Kent, Washington	8/21/86	SK paid plaintiffs \$9,625.31 for covenant not to sue and dismissal from case pending
Standard Equipment, Inc., et al. v. The Boring Co., et al.	#C84-11290	U.S.D.C. for the Western District of Washington at Seattle	Federal Superfund action in Kent, Washington	8/21/86	SK paid plaintiffs \$9,625.31 for covenant not to sue and dismissal from case pending
A v. John Vasl, et al.	C90-1167	U.S.D.C. Northern District of Ohio, Eastern Division	Superfund action - Summit National Site, Deerfield, Ohio		Although SK EnviroSystems was named as a PRP, McKesson Corp. retained liability as the former owner of the facility
Ohio v. Donald Georgeoff, et al.	C81-1961	U.S.D.C. Northern District of Ohio, Eastern Division	Superfund action - Summit National Site, Deerfield, Ohio		Although SK EnviroSystems was named as a PRP, McKesson Corp. retained liability as the former owner of the facility
NJDEP v. Safety-Kleen Corp.	C-92-90	Superior Court of NJ Essex Co.	Alleged nonpayment of final penalty assessed	Apr-90	Safety-Kleen required to pay \$16,796.16 penalty

ATTACHMENT D.2

SAFETY-KLEEN CORPORATION
CIVIL SUITS

<u>TITLE OF CASE</u>	<u>DOCKET NUMBER</u>	<u>NAME AND LOCATION OF COURT</u>	<u>NATURE OF SUITE OR ALLEGED VIOLATION</u>	<u>DATE OF JUDGEMENT</u>	<u>DISPOSITION</u>
Nevada DEP v. Safety-Kleen Corp.	92-00250A	1st Judicial Court Federal Nevada	Storage of waste on-site greater than 10 days 1/15 and 4/29/91	2/25/92	Settled — paid \$13,200

Safety-Kleen Corp. and Subsidiaries
List of Facilities Noncompliant in More than One Media or Associated with Superfund Sites

EPA ID	FACILITY NAME (S) ¹ & ADDRESS	DATA BASES (STATUTES)				
		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
ILD980613913	Safety-Kleen 633 E. 138th St. Dolton, IL 60419		X	X	X	
LD005450697	Safety-Kleen 1445 W. 42nd St. Chicago, IL 60609	X	X	X	X	
NJD002182897	Safety-Kleen 1200 Sylvan St. Linden, NJ 07036	X	X	X	X	X
CTD009717604	Solvents Recovery Svc of N.E. 114 Lazy Lane Southington, CT 06489		X		X	X
KYD981027469	Safety-Kleen 550 Blue Sky Pkwy Lexington, KY 40511				X	X
ALD000653303	Safety-Kleen 4815 North Birmingham Rd. Montgomery, AL 36108		X		X	
ALD000776807	Safety-Kleen 201 Section Line St. Gurley, AL 35748		X		X	
ALD071951628	Safety-Kleen 3023 Dials St. Whistler, AL 36612		X		X	

1 Facility names as appearing in various databases
2 Applicable statute depends on substance spilled

Safety-Kleen Corp. and Subsidiaries
List of Facilities Noncompliant in More than One Media or Associated with Superfund Sites

EPA ID	FACILITY NAME (S) ¹ & ADDRESS	DATA BASES (STATUTES)				
		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
ALD077640001	Safety-Kleen 1000 Larkin - Hoke Ave. Dolomite, AL 35061		X	X	X	
ALD981028798	Safety-Kleen Coleman Commercial Site Huntsville, AL 35804		X		X	
AZD089308803	Safety-Kleen 4401 E. University Phoenix, AZ 85034		X		X	
AZD980892897	Safety-Kleen 4161 E. Tennessee Tucson, AZ 85714		X		X	
CAD053044053	Safety-Kleen 404 Market St. Oakland, CA 94607		X	X	X	
CAD066177783	Safety-Kleen 3876 Florista St. Los Alamitos, CA 90720		X	X	X	
CAD077187888	Safety-Kleen 3461 Woodward Ave. Santa Clara, CA 95050		X		X	
CAD080916968	Safety-Kleen 6306 Federal Blvd. San Diego, CA 92114		X		X	

¹ Facility names as appearing in various databases
² Applicable statute depends on substance spilled

Safety-Kleen Corp. and Subsidiaries
List of Facilities Noncompliant in More than One Media or Associated with Superfund Sites

EPA ID	FACILITY NAME (S) ¹ & ADDRESS	DATA BASES (STATUTES)				
		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
CAD093459485	Safety-Kleen 1000 S "I" St. Reedley, CA 93654		X	X	X	
CAD980817159	Safety-Kleen 1147 N. 10th St. San Jose, CA 95112		X	X	X	
CAT000613893	Safety-Kleen 10625 Hickson St. Unit A El Monte, CA 91731		X		X	
CAT000613927	Safety-Kleen 7979 Palm Ave. Unit E Highland, CA 92346		X	X	X	
CAT000613943	Safety-Kleen 5750 Commerce Blvd. Rohnert Park, CA 94928		X	X	X	
CAT000613950	Safety-Kleen 2576 Mercantile Dr. Rancho Cordova, CA 95670		X	X	X	
CAT000613976	Safety-Kleen 2120 South Yale St. Santa Ana, CA 92704		X		X	
CAT000613984	Safety-Kleen 214 Montecito Dr. Santa Barbara, CA 93103		X		X	

1 Facility names as appearing in various databases

2 Applicable statute depends on substance spilled

Safety-Kleen Corp. and Subsidiaries
List of Facilities Noncompliant in More than One Media or Associated with Superfund Sites

EPA ID	FACILITY NAME (S) ¹ & ADDRESS	DATA BASES (STATUTES)				
		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
CAT000613992	Safety-Kleen 13024 Bradley Ave. Sylmar, CA 91342		X	X	X	
COD000716613	Safety-Kleen 4980 Locust Street Commerce City, CO 80022		X		X	
COD000716621	Safety-Kleen 2080 West Amhurst Englewood, CO 80110		X		X	
COD000716639	Safety-Kleen 2841 East Fourth St. Pueblo, CO 81001		X		X	
COD980954101	Safety-Kleen 1345 W. Bayaud Ave. Denver, CO-80223		X		X	
COT090010851	Safety-Kleen 368 Bonny St. Pueblo, CO 81501		X	X	X	
CTD000845982	Safety-Kleen 24 Brixton St. West Hartford, CT 06110		X	X	X	
CTD980667927	Safety-Kleen 11 Tipping Drive Lot 4 Brandford, CT 06405		X	X	X	

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Safety-Kleen Corp. and Subsidiaries
List of Facilities Noncompliant in More than One Media or Associated with Superfund Sites

EPA ID	FACILITY NAME (S) ¹ & ADDRESS	DATA BASES (STATUTES)				
		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
GAD000776781	Safety-Kleen 5217 Augusta Road Garden City, GA 31408		X	X	X	
AD000823070	Safety-Kleen 3440 Lang Ave. Hapeville, GA 30354		X		X	
GAD000823096	Safety-Kleen 5920 Coca Cola Blvd. Columbus, GA 31908		X	X	X	
GAD980709257	Safety-Kleen 6580 Hawkinsville Rd. Macon, GA 31206		X		X	
GAD980842777	Safety-Kleen 4800 S. Old Peach Tree Rd. Norcross, GA 30071		X	X	X	
GAD980842835	Safety-Kleen Dietzroad/Rural Rte 5 Ringgold, GA 30736		X		X	
HID033969072	Safety-Kleen 2889 Mokumoa St. Honolulu, HI 96819		X		X	
IAD083489773	Safety-Kleen 5318 NW 111th Dr. RR2 Grimes, IA		X	X	X	

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IAD098027592	Safety-Kleen 3035 W. 73 St. Davenport, IA 52806		X	X	X	
ILD000665851	Safety-Kleen 9631 West 194th St. Mokena, IL 60448		X	X	X	
ILD000805911	Safety-Kleen Elgin Solvent 1500 Villa St. Elgin, IL 60120		X	X	X	
ILD000805929	Safety-Kleen 306 Campus Dr. Arlington Heights, IL 60004		X	X	X	
ILD079749073	Safety-Kleen 726 728 800 Morse Ave. Schaumburg, IL 60008		X	X	X	
ILD093862811	Safety-Kleen RR #3 Pekin, IL 61554		X		X	
IND000715474	Safety-Kleen 2217 Western Avenue South Bend, IN 46628		X	X	X	
IND000815886	Safety-Kleen 8418-24-26 Brookville Rd. Marion, IN 46239		X	X	X	

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IND000815894	Safety-Kleen Corp. 4417 St. Joe Street Evansville, IN 47712		X	X	X	
IND077042034	Hodges Lloyd (CERCLIS) Breslube USA (RCRIS) 601 Riley Road East Chicago, IN 46312		X		X	
KYD053348108	McKesson Envirosystems (CERCLIS) Safety-Kleen (RCRIS) State Hwy 146 New Castle, KY 40050		X	X	X	
KYD091514653	Safety-Kleen 751 Grade Lane Louisville, KY 40213		X		X	
MAD000846006	Safety-Kleen 128 Elm Street Bridgewater, MA 02324		X	X	X	
MAD060095569	Safety-Kleen Corp. 189A Willow Street Salisbury, MA 01950		X	X	X	
MAD088978143	Safety-Kleen Corp. 50 Brigham Street Marlborough, MA 01752		X		X	

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		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
MAD096287354	Safety-Kleen Boston Post Rd. West Brookfield, MA 01585		X	X	X	
MDD000737395	Safety-Kleen 12164 Tech Road Silver Spring, MD 20904		X	X	X	
MDD093003549	Safety-Kleen 1012-1/2 Leslie Ave. Catonsville, MD 21228		X		X	
MDD981034291	Safety-Kleen 1448-50 Desoto Rd. Baltimore, MD 21230		X	X	X	
MOD000669051	Safety-Kleen Rte 2 Box 549D (Behind Cooks Ge) Cape Girardeau, MO 63701		X		X	
MOD029729688	Dundee Cement (CERCLIS) Holnam Inc./Safety-Kleen (RCRIS) 1 Mi. N. Hwy 79 Clarksville, MO 63336		X		X	
MOD980973564	Safety-Kleen 901 Yuma Dr. Independence, MO 64055		X	X	X	

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		AFS (CAA)	CERCLIS (CERCLA)	ERNS ² (MULTI-STATUTE)	RCRIS (RCRA)	PCS (CWA)
VTD000791699	Safety-Kleen 3 Mile Bridge Road (CERCLIS) 23 W. Second St. (RCRIS) Middlesex, VT 05602		X	X	X	
WAD000712034	Safety-Kleen E 9516 Montgomery, Unit 6 Spokane, WA 99206		X		X	
WAD980978746	Safety-Kleen Corp. 814 E. Ainsworth Pasco, WA 99301		X		X	
WVD000737387	Safety-Kleen Harris Drive Rock Branch Ind. Park Nitro, WV		X	X	X	
WVD981034101	Safety-Kleen Wheeling Industrial Park Wheeling, WV 26003		X	X	X	

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MSD000776765	Safety-Kleen 120 Richardson Drive Jackson, MS 39213		X		X	
NED020185138	Safety-Kleen 14564 Grover St. Omaha, NE 68144		X		X	
NJD069039626	Safety-Kleen Clayton Solvent Ctr. Cenco Blvd. Clayton, NJ 08312		X	X	X	
NVT330010208	Safety-Kleen 1655 Stocker St. Las Vegas, NV 89030		X		X	
NYD000708198	Safety-Kleen 80 Seabro Ave. North Amityville, NY 11701		X	X	X	
OHD980587364	Safety-Kleen Rte 79 N. Newark Ind. Pk. Hebron, OH 43025		X	X	X	
ORD000712067	Safety-Kleen 550 Shelly St. Springfield, OR 97477		X		X	
ORD092895481	Safety-Kleen 11843 SE Hwy 212 Clackamas, OR 97015		X		X	

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PAD065716813	Safety-Kleen Bldg PP #9 River Road Tullytown, PA 19007		X		X	
PAD084872043	Safety-Kleen 98 Second St. Wilkes-Barre, PA 18705		X		X	
PAD086673407	Safety-Kleen 1606 Pittsburgh Ave. Erie, PA 16505		X		X	
PAD981737109	Safety-Kleen Hanover Industrial Estate Hanover, PA 18773		X		X	
PRD090399718	Inland Chemical of Puerto Rico KM 52 Hwy 2 Manati, PR 00701		X	X	X	
SCD980709299	Safety-Kleen Hwy 17A S. Summerville, SC		X		X	
SDD000716696	Safety-Kleen 2000 N. Westport Ave. Sioux Falls, SD 57107		X		X	
TND079025698	Safety-Kleen 826 Stewart Knoxville, TN 37917		X		X	

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