

IMAGE QUALITY

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



*Sent Via Fax ((904)448-4366)
and Federal Express Mail -
Airbill No. 8217339535*

November 8, 1993

Ms. Vicky Valade
Hazardous Waste Section
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, FL 32256-7577

Subject: Incident Dated October 8, 1993 and
Storage Over 10 Days of Transfer Waste;
Orange Park Facility, Clay County;
EPA ID Number FLD 980 847 214

Dear Ms. Valade:

Per our telephone discussion last October 25, the purpose of this letter is to notify you in writing of an incident which occurred at the referenced facility last October 8, 1993 and to notify you of an incident of non-compliance which first came to our attention last October 22, 1993. Per our telephone discussion last November 5, Safety-Kleen may provide the information on the date of this letter.

Although there was no fire, explosion, or release to the environment associated with the October 8 incident, we feel this matter should be brought to the Department's attention and you wanted to see a written report. Since the same container was involved, information required under 40 CFR 264.56(j) and General Condition 8 of our permit HO10-209007 is being provided below in one letter.

1. Name, Address, and Telephone Number of Owner or Operator:

Scott E. Fore, Senior Vice President
Environment, Health, & Safety Dept.
Safety-Kleen Corp.
1000 N. Randall Road
Elgin, IL 60123-7857
tel. (708)697-8460

2. Name, Address, and Telephone Number of Facility:

DOCKET # 93-20

RECEIVED
NE DISTRICT
JACKSONVILLE

Nov 9 '93

DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

BBP
va
ff

Russ Giambrone, Branch Manager
Safety-Kleen Corp.
161 Industrial Loop South
Orange Park, FL 32073
tel. (904) 264-2607

3. Date, Time, and Type of Incident:

October 8, 1993, Friday, Approximately 4:30 PM

Safety-Kleen transported one - 30 and one - 55 gallon drum of waste paint related material from Nationwide Insurance in Gainesville. A copy of the manifest and waste survey is enclosed. Upon arrival at the Orange Park facility, facility personnel felt the middle part of the 30 gallon drum was "hot". The hotness was described as being similar to a hot uninsulated cup of coffee that one can hold on to. The drum showed no signs of bulging. Facility personnel then wore safety equipment. The bung was then removed. The removal of the bung showed no signs of pressure build up or a chemical reaction inside the drum. The bung was reinstalled and the entire drum was placed in an overpack container and was stored in the permitted transfer waste storage shelter located outside the warehouse.

Mr. Russ Giambrone, the branch manager, instructed the service representative who initially transported the drum to return the drum to the customer the following Monday. The drum was not returned as instructed and was stored at the facility until October 22. Upon discovery on October 22, the drum was returned the same day. The service representative in question was reprimanded.

The drum was stored at the Orange Park facility for over ten days due to personnel oversight. Personnel performing inspections were strictly reminded to watch out for transfer waste storage time exceedances when inspecting transfer waste drums. The transfer storage start date is noted on every transfer waste drum.

4. Name and Quantity of Material(s) Involved:

An analysis of the prequalification sample taken from the drum shows that the material was a waste paint related material. The material was contained in a 30 gallon drum and overpacked in a 55 gallon drum.

5. Extent of Injuries If Any:

None

6. An Assessment of the Actual or Potential Hazards to Human Health or the Environment:

We believe there was no actual hazard. We believe any potential hazard was eliminated when the drum was placed in an overpack container.

7. Estimated Quantity and Disposition of Recovered Material That Resulted from the Incident:

There was no spill or release related to this incident as such no material was recovered. The overpacked drum was returned to the customer. The waste must be resampled and analyzed to determine new contents before Safety-Kleen can transport the drum.

Per our discussion, you also wanted to know any information that Safety-Kleen is aware of regarding the incident which occurred at the customer's location on October 22. Safety-Kleen has no first hand knowledge of the incident. We know that Safety-Kleen personnel returned the drum on October 22. It is our understanding from telephone discussions with the customer that the local fire department in Gainesville was contacted and that the fire department responded. There were no Safety-Kleen personnel at the customer's location when the phone call to the fire department was made. Safety-Kleen personnel were not present either when the fire department responded.

Your consideration in this regard is requested. If you have any questions, please call me at (813)682-8094.

Sincerely,



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

cc: Tom Shewey, Nationwide Insurance

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. FLD984194332		Manifest Document No. NE 196019		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address NATIONWIDE INS. JACKSONVILLE 3300 WILLISTON ROAD GAINESVILLE, FL 32608		4. Generator's Phone (904) 338-4129		6. US EPA ID Number OF ENVIRONMENTAL PROTECTION		A. State Manifest Document Number			
5. Transporter 1 Company Name SAFETY-KLEEN CORP.		7. Transporter 2 Company Name		8. US EPA ID Number		B. State Generator's ID			
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. STATE HWY 146 NEW CASTLE, KY 40050		10. US EPA ID Number KYD053348108		12. Containers No. Type 17 DM		13. Total Quantity 224		14. Unit Wt/Vol P	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) RM WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (F003) (ERG#26)								Waste No. F003 D001	
15. Special Handling Instructions and Additional Information 11A. CONTROL #0189154-5 SR# 1153		EMERGENCY RESP# 1(708)888-4660		3-079-01-9316		PP# m96019			
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 R. A. MAC GILLAVRY		Signature <i>R. A. Mac Gillavry</i>		Date 10/08/93			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Duane Hall		Signature <i>Duane Hall</i>		Date 10/08/93					
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		Signature		Date Month Day Year					

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

90290

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ORIGINAL-RETURN TO GENERATOR

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering existing data, and completing and reviewing the form. Send comments regarding this burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, RM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

KYDO53348108

KY. 40050

RECEIVED
NINTH DISTRICT
JACKSONVILLE

Nov 9 '93

DEPARTMENT OF
ENVIRONMENTAL

TREATMENT STANDARDS (total mg/l, except as noted by TCLP)

Treatment Standard

Parameter	Concentration	Treatment	Notes
Halogenated Organic Compounds	1000.0	Incineration*	* These treatment standards do not preclude solvent recovery or use as fuel prior to land disposal.
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Treatment Standards Reference in 40 CFR
and Technology Codes for 40 CFR 268.42(a)

Check All
That Apply

Waste code	Description	Wastewaters	Nonwastewaters
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, OR INCIN <u>X</u>
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT
D004	Arsenic (As)	268.43(a)	268.41(a)
D005	Barium (Ba)	268.43(a)	268.41(a)
D006	Cadmium (Cd)	268.43(a)	268.41(a)
D007	Chromium (Cr)	268.43(a)	268.41(a)
D008	Lead (Pb)	268.43(a)	268.41(a)
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC
D010	Selenium (Se)	268.43(a)	268.41(a)
D011	Silver (Ag)	268.43(a)	268.41(a)
F005	2-Ethoxyethanol	268.42(a) INCIN*	268.42(a) INCIN*
F005	2-Nitropropane	268.42(a) INCIN*	268.42(a) INCIN*

Other Codes See attachment for supplemental list

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment. (check if app

EPA ID:

Name & Title:

Control Number: 0188154-B

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

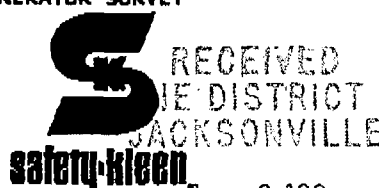
80918 - R2271 (RUN 09/23/93)
PROJECT: PREQUALIFICATION
BRANCH/TERRITORY: 307901
JACKSONVILLE

PRE-QUALIFICATION EVALUATION - BRANCH INDUST
GENERATOR SURVEY

SERVICES PAGE 1
COMPLETED: 09/23/93
REVISED: 09/23/93

ACCEPT

FLUID RECOVERY SERVICES
NATIONWIDE INSURANCE
WASTE THINNERS/TONERS



ACCEPT

CONTROL #: 0000189154-5
LAB #: 0000074913-7
SURVEY #: 0000288273

CUSTOMER INFORMATION: 3079-01-8318

DEPARTMENT OF ENVIRONMENTAL PROTECTION
FEDERAL EPA ID: FLD884184332
STATE EPA ID:

NATIONWIDE INS
3300 WILLISTON RD
GAINESVILLE

FL 32608

ATTN: NAME ILLEGIBLE

BRANCH: 307901 - JACKSONVILLE

GENERATOR: NATIONWIDE INSURANCE

NATURE OF BUSINESS: INSURANCE

S.I.C. NO:

FACILITY ADDRESS:

BILLING:

3300 WILLISTON RD
GAINESVILLE

FL 32608

GENERAL DESCRIPTION: WASTE THINNERS/TONERS.

PROCESS DESCRIPTION: OBSOLETE MATERIAL

GENERATION AMOUNT: 25 GALLONS FOR ONE TIME ONLY

AMOUNT ON HAND: 25 IN DRUMS

SHIPPING FREQUENCY: ONCE

IN EITHER DRUMS OR BULK

COLOR:

PCT SOLIDS NOT SAMPLED:

PH RANGE:

4-10

LAYERS OR PHASES: TWO

PHYSICAL STATE: LIQUID VISCOSITY: LOW

MATERIAL COMPOSITION:

CODE MAX TYPICAL

THINNER

T 50.00

WATER

W 30.00

TONER

20.00

ATTACHMENTS: NONE

RESTRICTED SUBSTANCES: NONE

HAZARD CLASS:

NUMBER:

NEED ASSISTANCE

EPA WASTE DESCRIPTION AND TREATMENT STANDARDS: RCRA HAZARDOUS WASTE: YES

LISTED EPA WASTE CODES: F003

P.O. NO: TYPE OF SAMPLE: COMPOSITE # OF DRUMS SAMPLED: 3 TAKEN BY: SK REP

NAME: NAME ILLEGIBLE

TITLE: OFF SERV

08/13/1993

(904) 338-4129

COMMENTS: BRING 30 GALLON DRUM. NO CHARGE.

CORPORATE REVIEWS: DISPOSITION REVIEWER DATE

TECHNICAL: ACCEPT MJK 09/22/93

REGULATORY: ACCEPT MJK 09/22/93

OPERATING: ACCEPT JWH 09/22/93

POSSIBLE FACILITIES:

658

PRICING CODE:

PART NUMBER: 82102

WASTE, NON-SPEC FUELS

APPROVED FACILITIES:

SAFETY-KLEEN CORP

STATE HWY 146

NEW CASTLE KY 40050

FED EPA#: KYD053348108

STATE EPA#:

TELEPHONE: 502/845-2453

STATE CODE:

APPROVD 0001153 DRUM OR BULK

DOT-EPA RQ WASTE PAINT RELATED MATERIAL

DESC. 3 UN1263 PG III

(F003)(ERG#26)

COMMENTS: OK FOR LOW BTU FUEL. F003 BASED ON SURVEY. NEED ARF
SIGNED AND RETURNED.

0000887 NOT FOR MANIFEST

PROPER SHIPPING DESCRIPTION WAS BASED ON

SURVEY INFORMATION RATHER THAN ANALYSIS.

SEE COMMENTS FOR DETAILS AND NOTICES.

EPA WASTE CODES
F003 0001

THIS SERVES AS NOTICE PER, 40CFR264.12(B), THAT THE FACILITY(IES) NOTED ABOVE
HAS THE APPROPRIATE PERMITS AND IS WILLING TO RECEIVE THE MATERIAL DESCRIBED.

CONTINUED ON NEXT PAGE

80918 - R2271 (RUN 08/23/93)

PREQU.

LOCATION EVALUATION - BRANCH INDUSTR
MATERIAL ANALYSIS

SERVICES

PAGE 2

COMPLETED: 08/23/93

REVISED: 08/23/93

BRANCH/SUBMITTER: 307901
RUSS GIAMBRONEACCEPT
FLUID RECOVERY SERVICES
NATIONWIDE INSURANCE
WASTE THINNERS/TONERSRECEIVED
NE DISTRICT
JACKSONVILLE

ACCEPT

CONTROL #: 0189154-6
SURVEY #: 288273

NOV 9 '93

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : LT YELLOW BROWN
WATER CONTENT : 72.0 WT%
NON-VOLATILE RESIDUE : 23.0 WT%
FLAMMABILITY : FLASHED AT 140 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
PH : EXTRACT BY METER 5.7
RADIOACTIVITY : NONE DETECTED
COMMENTS: 3% SLUDGE H2O COMP NEG 2% SOLIDDEPARTMENT OF
ENVIRONMENTAL
PROTECTION

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT: 5700 BTU/LB
TOTAL BROMINE BR: < 0.1 WT%
TOTAL FLUORINE F: < 0.1 WT%ASH UPON COMBUSTION: < 1.0 WT%
TOTAL CHLORINE CL: < 0.1 WT%
TOTAL SULFUR S: < 0.1 WT%

GENERAL COMPOSITION:

	SPECIFIC GRAVITY	VISCOSITY (CENTIPOISE)	GENERAL COMPOSITION BY: APPEARANCE (VOL%)	TOTAL (WT %)
AQUEOUS PHASE (FREE WATER)			0.0	0.0
ORGANIC PHASE (FEEDSTOCK)			100.0	100.0
BOTTOM SLUDGE (SEMISOLIDS)			0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)			0.0	0.0
TOTAL	.900	< 50 CPS	100.0	100.0

SPECIFIC COMPOSITION OF TOTAL SAMPLE

	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT		72.0	72.0
NON-VOLATILE RESIDUE	DESCRIPTION: SOLID	23.0	23.0
VOLATILE ORGANICS BY DIFFERENCE		5.0	5.0
TOTAL		100.0	100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT, NEAT, METHANOL-EXTRACT,
DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF:	VOLATILE ORGANICS (WT%)	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
TRACES OF VOLATILE ORGANICS DETECTED (<1.0% EACH)	CODE CAS NUMBER			
	TR 0-27-1	100.0	100.0	5.0
TOTAL		100.0	100.0	5.0

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%:

ALCOHOLS
AROMATIC HYDROCARBONS
ESTERS
GLYCOL ETHERS
KETONES
ALIPHATIC HYDROCARBONS
CHLORINATED SOLVENTS
ETHERS
INHIBITORS
NITROGEN COMPOUNDS

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A

LEVEL: SEG CODE: RELEASED: 09/21/93
LAB REVIEWERS: AJ AJ ANALYZED: 09/20/93
WATER BY DIFFERENCE.

TRACKING INFORMATION:

DATE FACILITY
SURVEY RECEIVED : 08/30/93 SK TECHNICAL CEN
SAMPLE RECEIVED : 08/26/93
RESAMPLE SHIPPED :
RESAMPLE RECEIVED:

THE ANALYSES CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.

EPA WASTE CODES FOR LDR: F003 D001

ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC COMPOUND WASTE.

F001-F005 COMPOUND CODES FOR LDR NOTICE: ACE

END OF DOCUMENT

80918 - R2270 (RUN 09/23/93)

SAFETY-KLEEN CORP.

PREQUALIFICATION EVALUATION
MANIFESTING INFORMATION

REVISED : 09/23/93

FLUID RECOVERY
NATIONWIDE INSURANCERECEIVED
NE DISTRICT
JACKSONVILLECONTROL#: 0189154-5
SAMPLE#: 288273

REQUIRED MANIFEST FORM: UNIFORM

Nov 9 '93

Safety-Kleen Corp. provides this manifesting information for instructional purposes only. All the information is believed to be accurate, but is known to be incomplete. Federal and State regulations and the instructions on the manifest form should be consulted for complete information. In addition, certain variations may be allowed by regulations, but need to be approved by a Safety-Kleen representative prior to shipment.

ENVIRONMENTAL
PROTECTION

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATOR US EPA NO. FLD984194332	DOCUMENT NO.	2. PAGE	UNDERLINED AREAS ARE REQUIRED
3. GENERATOR NAME AND MAILING ADDRESS NATIONWIDE INSURANCE 3300 WILLISTON RD GAINESVILLE FL 32608			A. STATE MANIFEST DOCUMENT NUMBER	
4. GENERATOR PHONE (804) 328-4128			B. STATE GENERATORS ID	
5. TRANSPORTER 1 COMPANY NAME SAFETY-KLEEN CORP.	6. US EPA ID NUMBER		C. STATE TRANS ID	
7. TRANSPORTER 2 COMPANY NAME	8. US EPA ID NUMBER		D. TRANSPORTER PHONE	
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP STATE HWY 146 NEW CASTLE KY 40050		10. US EPA ID NUMBER KYD053348108	E. STATE TRANS ID	
			F. TRANSPORTER PHONE	
			G. FACILITY STATE ID	
			H. FACILITY PHONE 502-845-2453	
11. US DOT DESCRIPTION (INCLUDING ALL PARTS REQUIRED BY US DOT)			CONTAINER	I. WASTE NO
a. RQ WASTE PAINT RELATED MATERIAL 3 UN1293 PG III (F003)(ERG#28)			DRUM OR BULK	F003
b. PROPER SHIPPING DESCRIPTION WAS BASED ON SURVEY INFORMATION RATHER THAN ANALYSIS. SEE COMMENTS FOR DETAILS AND NOTICES.			NOT FOR MANIFEST	
J. ADDITIONAL DESCRIPTION FOR MATERIALS LISTED ABOVE D001			K. HANDLING CODES FOR WASTES ABOVE S01/S02/T50	

15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

CONTROL NO 0189154-5 SAMPLE NO 288273 CUSTOMER NUMBER 3-079-01-9318 -FOR ALL SAFETY-KLEEN SHIPMENTS

EMERG RESP# 708-888-4880 24 HR

SK-DOT NUMBERS A: 0001153 B: 0000887

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED