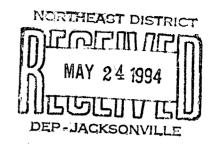
## **IMAGE QUALITY** AS YOU VIEW THE FOLLOWING DOCUMENT, PLEASE NOTE THAT PORTIONS OF THE ORIGINAL WERE OF **POOR QUALITY**



May 23, 1994

Ernest E. Frey, P.E.
Director of District Management
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577



Subject: Safety-Kleen Corp, Orange Park Facility
Warning Letter No. WL94-0445HW10NED
DER/EPA ID FLD 980 847 214

Dear Mr. Frey:

On May 10, 1994, representatives of Safety-Kleen (SK) met with your staff to discuss the subject letter. We were asked to provide in writing the information presented at the meeting, along with appropriate documentation. This response is a good faith effort to resolve the Department's concerns. It is our intention and expectation that nothing in this letter shall be construed as an admission or used against Safety-Kleen Corp. in any administrative or judicial proceeding. Safety-Kleen Corp. expressly reserves any and all defenses it might have to the matters set forth in the warning letter and does not waive any of those defenses by making this response.

### DEP Item 1:

- a) "Facility failed to assign the waste code D007 to several shipments of dumpster sludge (manifest numbers 21893, 29132 and 19432)."
- b) "Facility failed to assign the waste codes D018, D021, D027, D039 and D040 to several shipments of immersion cleaner (manifest numbers 50930, 50919 and 42394)."
- c) "Facility failed to assign the waste codes D001, D006, and D007 to several shipments of paint waste (manifest numbers 50930 and 50919)."
- d) "Facility failed to include the F002 waste code on the mineral spirits tank waste after the mop water was added to the tank."
- e) "Facility failed to include the appropriate waste codes on manifest numbers 21893, 29132, 50930, 19432, 50919, 42394."

### Response to Item 1:

- a) Appropriate waste codes are determined from the annual recharacterization testing, required under SK's Waste Analysis Plan in the hazardous waste permit. A description of this program is summarized in the Enclosure 1 memo. A review of the annual test results for the past four years shows that D007 is not an applicable code for dumpster sludge (selected pages of the last four reports comprise Enclosure 2 12 pages). Therefore the failure to include waste code D007 on manifests numbers 21893, 29132, and 19432 is not a violation. The code D007 has been inconsistently used on dumpster sludge shipments from Orange Park. It is unclear why the code was included but the test results indicate it is unnecessary. SK will discontinue use of the code D007, to provide the most accurate waste description. The applicable waste codes are D001, D006, D008, D018, and D039. Since DEP has acknowledged "over-characterizing" waste by including codes that may not be applicable is acceptable, using D007 also is not a violation.
- b & c) The waste codes specified in your letter were not added to three manifests. It is SK practice to list all waste codes, not just primary codes, in manifest Sections I and J. It should be noted that codes D006 and D007 were used and the waste was handled in accordance with the regulations. The presence of the other codes would not have affected the handling or disposal procedures.
- d) We disagree that the code F002 applies to the mop water and believe that a misunderstanding by the warehouseman, Tim Windham, regarding the mopwater question by DEP led to this conclusion. Tim understood the question to be "how do you clean the floor?", not "how do you cleanup a spill?". Solid materials, sludge, and small spills are cleaned up with absorbent wipes, as observed by DEP during the inspection. Mopping of the warehouse floor is done periodically as a good housekeeping measure and not for the purpose of cleaning up solid debris/sludge dropped on the floor. Mopwater is handled as "hazardous waste" as a precaution only, to preclude any question as to possible contamination.
- e) Item E does not present any new factual allegations.

This item was proposed as moderate/minor with a proposed penalty of \$4,000. Several of the matters cited are not violations. The waste was handled exactly the same as if the additional codes had been included. Safety-Kleen believes that the Potential for Harm was minor. For purposes of settlement discussion, we would be willing to pay a penalty of \$500.

### DEP Item 2:

a) "Facility failed to enter the generator's EPA ID number on manifest number 39207."

### Response to Item 2:

a) Manifest 39207 was for the shipment of waste resulting from a spill cleanup. The spill did not occur at the branch. The EPA ID number used was a temporary number assigned to the spill location by DEP. In this case, the temporary number used was correct and no violation occurred.

### DEP Item 3:

- a) "Facility accepted and transported two shipments of hazardous waste from Florida Wire and Cable, and one shipment form Riverside Dry Cleaners without a manifest."
- b) "Facility accepted hazardous waste from a Small Quantity Generator (Tresca Industries) that had not obtained an EPA/DER identification number without a manifest."

### Response to Item 3:

a & b) These items were discovered and self-reported by SK. The Warning Letter proposes that this item is moderate/moderate with a penalty of \$6,500. We believe that the Potential for Harm was minor, since the waste was handled and disposed of exactly the same as if a manifest had been used. For the purpose of settlement discussions, we would accept the "moderate" for the Deviation from Requirement and propose a penalty of \$1,000. We also believe our Good Faith effort in finding and reporting this violation should be considered.

### DEP Item 4:

a) "Facility failed to adequately train the warehouseman that handled and attempted to clean up hazardous waste without first donning protective clothing."

Response to Item 4:

### Response to Item 4:

a) The warehouseman had received adequate training on proper spill cleanup procedures. His training is documented on Enclosure 3. Immediately prior to the incident described, the warehouseman, Tim, was wearing safety glasses, steel-toed shoes, and rubber gloves. Tim removed the gloves in order to operate the pallet jack. After moving the pallet, he used an absorbent wipe to pick up the material on the floor but failed to put the gloves back on. His

oversight was due to his haste to comply with the inspector's direction and his nervousness over being observed by a State official, not his lack of training. This was a one-time mistake and not an indication that his training was inadequate. We believe our training program complies with the requirements and there was no violation.

### DEP Item 5:

- a) "Facility failed to remove the spilled dumpster sludge and the spilled perchloroethylene hazardous waste from the floor of the container storage area that had been there since at least four days before the inspection."
- b) "Hazardous waste leaked from a container of dumpster sludge, and from a container of perchloroethylene, and the facility had not taken any steps to clean it up."

### Response to Item 5:

a & b) The small amount of dumpster sludge on the container storage area floor under the pallet appeared to be slowly seeping from a seam in the waste container and not from a "spill". The seepage had not been observed during container inspection the day before, so it must have begun between the previous day's inspection and the DEP visit. The seepage was cleaned up and the leaking drum overpacked immediately upon discovery. We question whether the other material referred to in the Warning Letter was "spilled perchloroethylene hazardous waste" that had "leaked ... from a container of perchloroethylene" since none of the perc containers were found to be leaking. We understand this conclusion was based on a statement by the warehouseman, but his speculation does not seem to match the conditions observed, e.g the lack of a leaking perc container. This item was proposed as a moderate/major with a penalty of \$10,500. Since both "releases" cited occurred within the secondary containment, the Potential for Harm was minor. It is not clear to us that the incident was a Deviation from Requirement, but for settlement discussion purposes, propose a penalty of \$1,000.

### DEP Item 6:

- a) "Facility failed to its amend [sic] contingency plan when list of emergency coordinators changed."
- b) "Facility does not have a current emergency coordinator."

### Response to Item 6:

a & b) 40 CFR 264.55 states that "At all times, there must be at least one employee either on the facility premises or on call (i.e. available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures". The SK Emergency Coordinators list in effect during the time of the inspection is Enclosure 4. Although the branch was in a transitional period at the time of the inspection, Russ Giambrone was still the Primary Coordinator. Even though Russ Giambrone had been transferred to the SK branch in Tampa, his address and phone number listed were still correct since he had not moved. He was available on weekends to respond if called. The two alternate coordinators listed were available both during the week and on weekends. At the time of the inspection, it was inappropriate to assign the new branch manager, Roy Stewart, the role of emergency coordinator since he did not have a permanent address or phone. Once Roy had moved near the branch he was designated as the emergency coordinator and the emergency contact list was revised. At all times, SK had an emergency coordinator and was in compliance with 40 CFR 264.55. Therefore no violation occurred.

### DEP Item 7:

a) "Facility's operating log did not contain the description and quantity of all waste received by the facility, or the location of each waste within the facility."

### Response to Item 7:

a) SK maintains a "Facility Logbook" to record incoming and outgoing shipments. The shipping documents and inspection records kept on-site satisfy the requirements of 40 CFR 264.73(b) for maintaining the description, quantity, and location of wastes received and kept at the facility. Safety-Kleen maintains the logbook to provide quick access of the information. However, we don't believe the logging of incoming wastes which are permitted for storage is a regulatory requirement since the information is available from other documents. Nonetheless, it is our company policy to record this information in a logbook and believe that all shipments should be consistently entered. Of the four incoming shipments that were not found in the logbook during the inspection, three were later located and copies of the logbook pages are Enclosure 5 (6 pages). The employee who made the logbook errors was terminated several months ago and the employees now performing the task are well aware of the correct procedures. This item was proposed as a major/major with a penalty of \$22,500. We believe not maintaining an accurate logbook for permitted wastes, when the information is available from other records, is not a violation. However, for settlement discussion purposes, we would agree to pay a \$1,000 penalty.

### DEP Item8:

a) "Facility moved containers of dumpster sludge and perchloroethylene in the storage area in a way that made the containers leak."

### Response to Item 8:

a) We disagree that the routine handling methods used caused the seepage from the seam in the drum of dumpster sludge. Occasionally we encounter a drum with an unsealed seam that begins to leak, unrelated to whether or not the drum is moved. In this case, the problem was resolved by overpacking the drum. We disagree that any of the perchloroethylene containers were leaking. It is our contention that no violation occurred.

### DEP Item 9:

- a) "Facility failed to include the waste code F002 from the container storage area mop water on the mineral spirits waste."
- b) "Facility failed to include treatment standards for the F001/F002 waste on several manifests."

### Response to Item 9:

a & b) Code F002 is not applicable. See response to Item 1.d.

### DEP Item 10:

a) "Facility stored waste from Nationwide Insurance and Quality Cleaners at its transfer area for more than 10 days."

### Response to Item 10:

a) This item was discovered and self-reported by SK. The Warning Letter proposes that this item is a moderate/major violation with a penalty of \$27,500. Since the wastes were handled in a safe manner, with no releases, and the proper paperwork used, we feel there was only minor Potential for Harm. For purposes of settlement discussion, we propose a penalty of \$1,000 + \$100/day \* 45 days = \$5,500. We feel our Good Faith effort in finding and reporting the violation should be considered.

### EPD Item 11:

a) "Facility failed to keep an accurate operating record that included the date the waste was sent off-site, and the generator's name."

### Response to Item 11:

a) Of the six logbook entries with discrepancies that were not resolved during the inspection, the manifest copies documenting actual shipments dates (showing <10 day storage) are enclosed (Enclosure 6, 6 pages). These shipments are listed on pages 4 and 5 of the Warning Letter. The logbook entries have been corrected and copies of the pages are enclosed (Enclosure 7, 5 pages). As stated under Item 7, the employee who made these errors was terminated several months ago and the employees currently performing the logging are well aware of and are following the correct procedure. The Warning Letter proposes this item as a moderate/moderate with a penalty of \$6,500. We believe noting an incorrect date in a logbook has only a minor Potential for Harm. SK discovered and self-reported the logging discrepancies and our Good Faith effort should be considered. For purposes of settlement discussion, we would propose a penalty of \$1,000.

### DEP Item 12:

a) "Facility added F002 mop wash waste water to the waste mineral spirits tank."

### Response to Item 12:

a) Code F002 is inappropriate for mopwater. See response to Item 1.d.

The DEP Penalty Computation Worksheet proposes a 25% upward adjustment for history of noncompliance. We understand from our meeting that this is standard DEP policy, even in cases such as ours where no previous Notices of Violation have been issued. We do not believe such an adjustment is appropriate in this instance. DEP's proposed penalty does not take into consideration SK's Good Faith efforts in self-reporting violations, and our prompt corrective action in resolving the issues noted during the January inspection. We believe our new personnel and management in Orange Park have made many improvements in a short time and have certainly demonstrated the company commitment to full compliance.

If you need additional information or want to further discuss any of these items or corrective action, please call me at 404-434-1572.

Very truly yours,

Della A. Ridley

Regional Environmental Manager

Enclosures: 1. Annual Recharacterization Memo (2 pages)

- 2. Selected pages from Recharacterization Reports (12 pages)
- 3. Documentation of training for warehouseman (1 page)
- 4. Emergency Contact List valid during Jan 1994 (1 page)
- 5. Shipping documents with logbook entries (6 pages)
- 6. Manifests showing <10 day storage (6 pages)
- 7. Corrected logbook pages (5 pages)



To:

Della Ridley

From:

Dennis Brinkman

Date:

May 17, 1994

Subject:

Annual Recharacterization Testing

The annual waste stream recharacterization testing performed by Safety-Kleen is a response to a need to characterize our wastes as described in 40CFR264.13. Most state regulatory agencies concur with us that our typical waste streams are sufficiently uniform and predictable that there is no justification for frequent detailed analyses. However, we agree that it is prudent to maintain a data base on our wastes.

Thus, each year we obtain up to 600 samples, many of which receive TCLP analyses, from our general lines of business. For the most part, these are related to:

- Parts Washer Solvent
- Immersion Cleaner
- Paint Gun Cleaner/Paint Waste
- Dry Cleaner Wastes
- Antifreeze

The sample sites are selected by two means:

- 1) Any specific sampling requirements included in a WAP, such as an initial characterization for a recently-approved permit, are included in this population.
- 2) Waste streams needing more samples are assigned on a random basis to a Branch or Recycle Center already having to take other samples, so they can be shipped together.

The samples are taken, preserved, and tested strictly according to EPA SW-846 protocol. In addition to the TCLP (except for pesticides/herbicides), we also test for flashpoint, specific gravity, and pH. In addition, if the samples have >0.5% dry solids, such that an extraction has been involved in the TCLP, we often also determine volatiles and semi-volatiles on the whole waste, since the extraction often masks the true composition of the waste, providing only the "extractable" components.

sting

All of the data are compiled on spread sheets that include similar testing on the same wastes over the past several years. These tables are studied for trends and possible need for further testing. EHS and Technical staff then get together to see if any EPA Waste Code changes might be in order. Our goal is to exclude any contaminant that has a 90% probability of not being present, which is in line with guidance obtained from EPA. The customer still has the right and responsibility to add (or delete) codes from the preprinted manifest based on his own knowledge of his operations and wastes.

A key point is that the contaminants are very consistent over time, as everyone would predict. Changes in waste codes, if any, are due to the frequency of occurrence near the TCLP limit changing just enough that a decision is made to include or exclude it. Thus, new codes do not reflect newly discovered constituents or some process change, but rather slight changes in concentrations around the regulatory limits that have convinced us to include (or exclude) the code on our generic manifest.

Early in the year following the year in which the samples were taken and analyzed, SK issues a summary report on the testing and a document describing any changes in waste codes. This is then implemented over time, as permits and other issues can be addressed. In this way, our information is kept current, and we can reassure both our customers and the regulatory agencies that the waste codes being used are valid and well-documented.

At that point we start the entire process over again, scheduling sampling and analysis for the current year.



SUBJECT:

Waste Stream Annual Characterization and TCLP Analyses DATE:

January 7, 1991 JSB 91-100M

TO:

All Branch Managers

All Recycle Center Managers

All AC/DC's

All Regional Environmental Engineers

D. Padovani

J. Hermann

D. Brinkman

S. Walczynski

R. Peoples .

E. Jurczak

K. Snell

. Constantelos

Enclosed are the TCLP laboratory analyses for the various lines of business handled by Safety-Kleen. These results are from representative samples taken at each recycle center during the month of July, 1990. Each recycle center has been provided with summary tables of each line of business and laboratory data from samples taken of the specific solvents handled at that recycle center. Due to the volume of paperwork, each recycle center and service center will only receive those analyses pertaining to the samples taken from their region. Most of the analyses are consistent throughout the country.

Each recycle center is responsible for forwarding this information to all of the branches which ship solvents to them. The branches and recycle centers are only being provided with laboratory analyses of the solvents that they handle.

Also attached is a copy of the memo from Clark Rose to all recycle centers which describes the sampling program. As part of the facility waste analyses plans, these analyses should remain on file at each facility and become part of the operating record. Service Centers should file the data under the Environmental 1100 series codes.

The laboratory analyses will be repeated annually and distributed through the corporate office to the recycle centers. The recycle centers will in turn distribute the information to all of the branches in their region. Each recycle center will be contacted again in June, 1991 with instructions on the sample collection.

As a result of the laboratory analyses some of the shipping descriptions and EPA waste codes have been changed to reflect the new TCLP waste codes. For example, EPA waste codes D018 and D039 have been added to the description for mineral spirits to reflect concentrations of benzene and perchloroethylene above the TCLP regulatory levels.

All of the sales reps and recycle center employees should be familiar with the TCLP regulations and how they affect Safety-Kleen's business. This will allow us to answer questions from our customers and thereby provide them with better service. The TCLP training video prepared by EHS should have been reviewed at the branches, AC/DC's, and recycle centers as a training topic. This video as well as the TCLP question and answer training topic must be recorded in the employee training records.

If you have any questions concerning TCLP, please contact your regional environmental engineer.

cc: S. Fore

C. Rose

### **Dumpster Mud Wastes**

### Physical Properties and TCLP Metals Analysis, ppm

	Parameter	pH	SG	FP	As	Вa	Cd	Cr	Pb	Hg	Se	Ag
	Reg. Limit	<2 or >10	na	< 100	5	100	1	5	5	0.2	1	. 5
LAB	SIIE											
M	CL	10	na	115	< 0.5	0.85	0.8	0.06	2.2	0.002	< 0.2	< 0.01
W	DE	7	na	80	< 0.05	1	0.84	< 0.05	570	< 0.01	< 0.05	< 0.05
W	EL	8	na	115	< 0.05	0.9	1	< 0.05	1.3	< 0.01	< 0.05	< 0.05
M	LE	6.5	na	85	< 0.5	0.47	2	0.01	1.3	< 0.001	< 0.2	< 0.01
C	RE	7.9	1.2	<b>8</b> 5	< 1	0.41	2.8	0.02	4.6	< 0.002	- < 1	< 0.5
M	CL	7.5	na	> 160	< 0.5	0.28	1.3	0.16	8.8	< 0.001	< 0.2	< 0.01

### TCLP Semi Volatiles Analysis, ppm

		Parameter				2.4-DNT	Cl6-benz (	CI6-13-but	Cl6-eth	nitrobenz	CI5-phenol	pyridine	2.4.5-TCP	2.4.6-TCP	•
	•	Reg. Limit	200	0.13	0.13	0.5	3	2	100	5	400	2			
LAB	SITE														
M	CL		10	< 0.33	< 0.33	< 0.33	< 0.33	< 0.33	< 1.7	< 1.7	< 0.33	< 0.33			
W	DE	,	5	< 0.033	< 0.033	< 0.033	< 0.033	< 0.033	< 0.17	< 0.17	< 0.033	< 0.033			
W	EL		96	< 0.091	< 0.091	< 0.091	< 0.091	< 0.091	< 0.46	< 0.46	< 0.091	< 0.091	-		
M	LE		< 0.033	< 0.033	< 0.033	< 0.033	< 0.033	< 0.033	< 0.17	< 0.17	< 0.033	< 0.033			
C	RE		0.88	< 0.066	< 0.066	< 0.066	< 0.066	< 0.066	< 0.34	< 0.34	< 0.066	< 0.066			
M	CL		22	< 0.67	< 0.67	< 0.67	< 0.67	< 0.67	< 3.3	< 3.3	< 0.67	< 0.67			

### TCLP Volatiles Analysis, ppm

		Parameter <i>Reg. Limit</i>	benzene 0.5	CCI4 0.5	Clbenz 100 ,	CHCI3 6	1.4-DCIB 7.5	1.2-DCA 0.5	1.1-DCE 0.7	MEK 200	PCE 0.7	TCE 0.5	VChlorkle 0.2
LAB	SITE												
M	CL	,	0.11	< 0.10	< 0.10	< 0.10	< 0.20	< 0.10	< 0.10	< 2.0	0.96	< 0.10	< 0.20
W	DE	*	0.52	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	< 0.10	< 0.10	< 0.20
W	EL		< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10	< 2.0	0.16	< 0.10	< 0.20
M	LE		< 0.10	< 0.10	< 0.10	< 0.10	0.52	< 0.10	< 0.10	< 2.0	0.64	< 0.10	< 0.20
С	RE		0.1	< 0.05	< 0.05	< 0.05	< 0.1	< 0.05	< 0.05	, 15	0.17	0.14	< 0.1
M	CL		< 0.10	0.17	4.3	< 0.10	> 4.4	< 0.10	< 0.10	< 2.0	3.6	0.45	< 0.20

J. Hantline

### SAFETY-KLEEN'S 1991 ANNUAL WASTE CHARACTERIZATION PROGRAM

Enseco Rocky Mountain Analytical Laboratory (RMAL, Arvada, CO) was selected to perform the 1991 waste stream recharacterization work. They are part of a national laboratory network and are certified in all states of interest to Safety-Kleen (see attached list of certifications).

The experimental plan was as follows:

Waste Streams Sampled -

Used Parts Washer Solvent - USEDPWS
Used Immersion Cleaner - USEDIC
Used Paint Gun Cleaner - 5 gal. - USEDPGC5
Used Paint Waste - 16 gal. - USEDPGC16
Used Dry Cleaner Bottoms - USEDDCBOT
Used Dry Cleaner Muck - USEDDCMUCK
Used Antifreeze - USEDAF
Dumpster Mud - DUMPMUD
Used Oil - USEDOIL
Distillation Bottoms, Parts Washer Solvent - DISTBOTPWS
Distillation Bottoms, Other - DISTBOTOTH
Wastewater, Chlorinated - WWCL
Wastewater, Nonchlorinated - WWNONCL
Used Parts Washer Solvent, 140°F Flash - 140PWS
Cooker Solids - COOKERSOLIDS

SK Recycle Centers Providing Samples -

Clayton, NJ - CL
Dolton, IL - DO
Hebron, OH - HE
E. Chicago, IL - EC
Denton, TX - DE
Elgin, IL - EL
Lexington, SC - LE

Small retains were collected from each shipment of a designated waste stream that arrived at a facility for a period of time from two to four weeks, depending on the number of shipments. These retains were sealed in glass vials and stored in a refrigerator at 4°C. At the end of the accumulation period, all retains were composited into larger glass containers supplied by RMAL and immediately shipped overnight in a cooler to their lab.



### PART WASHER SOLVENT SLUDGE

Total Metals
TCLP Leachate

		CLPWS SU 16 OCT					
Parameter	Units	Result	Reporting Limit				
Arsenic	mg/L .	NO	5.0				
Barium	mg/L	4.5	0.5				
Cadmium	mg/L	2.1	0.25				
Chromium	mg/L	16	0.5				
Lead	mg/L	25.1	. 2.5				
Mercury	mg/L	0.016	, 0.002				
Selenium	mg/L	ФИ	0.25				
Silver	ma/L	NO	0.5				

# SAFETY - KLEEN CORP. ANNUAL WASTE STREAM RECHARACTERIZATION DATA REPORT 1992

Allan A. Manteuffel Technical Center Elk Grove Village, Illinois

### SAFETY-KLEEN'S 1992 ANNUAL WASTE CHARACTERIZATION PROGRAM

The testing this year was performed at the Safety-Kleen Technical Center (Elk Grove Village, IL) by our TCLP laboratory. All samples were taken by SK employees and shipped overnight in coolers as per the EPA protocol.

We received at least one sample for each of the following waste streams -

Antifreeze, Used Cooker Solids Dry Cleaner Bottoms, Used Dry Cleaner Muck, Used Dry Cleaning Filter Powder Dumpster Mud Immersion Cleaner, Distillation Bottoms Immersion Cleaner, Sludge Immersion Cleaner, Used Paint Gun Cleaner - 5 gal., Used Paint Waste - 16 gal., Used Parts Washer Solvent, Distillation Bottoms Parts Washer Solvent, Sludge Parts Washer Solvent, Used Wastewater, Chlorinated Wastewater, Nonchlorinated

Depending on the requirements of the various waste analysis plans, samples were taken over periods of one day to four weeks. Recycle Centers took samples from shipments as they arrived for in-bound wastes or from stream samples as they were generated for process wastes generated by the facility. Branches took samples from individual drums.

These retains were sealed in glass vials or jars and, if held more than 24 hours, stored in a refrigerator at 4°C. At the end of the accumulation period, all retains were composited into larger glass containers supplied by the TCLP lab and immediately shipped overnight in a cooler.

The tests performed were:

Toxic Characteristic Leaching Procedure - TCLP
[We ran metals, volatiles, and semi-volatiles
(excluding pesticides and herbicides)].
Flash Point
Specific Gravity

For samples that had to be extracted for TCLP analysis, rather than just filtered and run neat, we also ran total volatile (EPA 8240) and semi-volatile organics (EPA 8270) (as opposed to extractable organics) on the whole waste. These data are denoted as "WHOLE WASTE". For samples that did not have to be extracted (<0.5% filterable solids), we used the total organics and metals results, as allowed in the TCLP procedure. If the analyses were done on two separate phases (organic and ageous), only the mathematical summation of the TCLP data (designated as "TOTAL") is given.

Some of the analyses show Practical Quantitation Limits (PQLs) well above the TCLP regulatory limits. This merely confirms the Safety-Kleen position that TCLP and other SW-846 methods are neither appropriate nor useful for many concentrated organic waste streams. The U.S. EPA has agreed with this position (Fed. Register, Feb. 8, 1990, p. 4440). In all of those instances where the reporting limit (PQL) was above the regulatory limit, customer knowledge of the waste will have to be used to determine whether a characteristic is likely to be present.

It is important to note the following:

- 1) Taken alone, no one analysis or set of analyses can or should be used to make broad conclusions, such as changes required for manifesting.
- 2) Some of the TCLP components that were found present were just above the regulatory limit. Since many of the tests were run on the total sample, it is reasonable to assume that a filtered and/or extracted sample (as allowed within TCLP) would yield results well below the TCLP limit. This is especially true for the metals data, such as the 7.8 ppm lead found in the Clayton Used Parts Washer Solvent.
- 3) This data is for composites of waste streams from individual generators to provide a "representative" characterization. This works well for the primary constituents and confirmation of the primary waste codes. However, trace components, such as the 4.5 ppm trichloroethylene that appears in the same Clayton Used Parts Washer Solvent, could easily have come from accidental contamination by a single generator. Again, this data set should not be used in isolation, but in conjunction with other historic data on each stream to make regulatory decisions.

If you have any questions concerning the sampling or analyses, please call Mark Hartwig at (312) 694-2700. If you have questions regarding the study as a whole, call Dennis Brinkman at the same number.

### INORGANICS - METHOD 6010 - TOTAL - TCLP

	DATE	PQL	CONC
ANALYTE - METALS	ANALY	(mg/L)	(mg/L)
Arsenic	1/6/93	0.45	<0.45
Barium	1/6/93	0.05	1.34
Cadmium	1/6/93	0.05	1.30
Chromium	1/6/93	0.05	0.08
Lead	1/6/93	0.35	3.43
Mercury	1/4/93	0.0008	<0.0008
Selenium	1/6/93	0.55	<0.55
Silver	1/6/93	0.10	<0.10

### ORGANICS - METHOD 8240 - VOLATILES - TOTAL - TCLP

	DATE	PQL	CONC
ANALYTE	ANALY	(mg/L)	(mg/L)
Benzene	1/11/93	0.5	<0.5
Carbon tetrachloride	1/11/93	0.5	<0.5
Chlorobenzene	1/11/93	0.5	<0.5
Chloroform	1/11/93	0.5	<0.5
Dichlorobenzene, 1,4-	1/11/93	0.5	<0.5
Dichloroethane, 1,2-	1/11/93	0.5	<0.5
Dichloroethylene, 1,1-	1/11/93	0.5	<0.5
Methyl Ethyl Ketone	1/11/93	2.5	<2.5
Tetrachloroethylene	1/11/93	0.5	0.6
Trichloroethylene	1/11/93	0.5	<0.5
Vinyl Chloride	1/11/93	0.7	<0.7

### ORGANICS - METHOD 2870 - SEMIVOLATILES - TOTAL - TCLP

	DATE	PQL	CONC
ANALYTE	ANALY	(mg/L)	(mg/L)
2-Methylphenol	1/7/93	0.011	<0.011
4-Methylphenol	1/7/93	0.048	0.640
2,4-Dinitrotoluene	1/7/93	0.036	<b>≮</b> 0.036
Hexachlorobenzene	1/7/93	0.070	<0.070
Hexachlorobutadiene	1/7/93	0.095	<0.095
Hexachloroethane	1/7/93	0.080	<0.080
Nitrobenzene	1/7/93	0.031	<0.031
Pentachlorophenol	1/7/93	0.450	<0.450
Pyridine	1/7/93	0.045	<0.045
2,4,5-Trichlorphenol	1/7/93	0.022	<0.022
2,4,6-Trichlorophenol	1/7/93	0.030	<0.030
1,4-Dichlorobenzene	1/7/93	0.050	<0.050



### FINAL

1993

## ANNUAL WASTE STREAM RECHARACTERIZATION ANALYSES

Allan A. Manteuffel Technical Center

P.O. Box 92050 Elk Grove Village, IL 60009-2050 12555 W. Old Higgins Rd. Elk Grove Village, IL 60007 Telephone: 312/694-2700

ix: 312/694-2733

### SAFETY-KLEEN'S 1993 ANNUAL WASTE RECHARACTERIZATION PROGRAM

The attached summary tables provide the results from our 1993 testing, as well as the results for the previous three years. This provides the full data set from which Safety-Kleen determines what waste codes to include on the pre-printed manifests. The testing this year was performed by Southwest Labs (Tulsa, OK) and the TCLP Laboratory here at the SK Technical Center (Elk Grove Village, IL).

As in previous years, all samples were taken by SK employees and shipped overnight in coolers, as per EPA protocol. The tests performed were: TCLP (metals, volatiles, semi-volatiles), specific gravity, flash point, and pH.

Some of the analyses show Practical Quantitation Limits (PQLs) well above the TCLP regulatory limits. This merely confirms the SK position that TCLP and other SW-846 methods are neither appropriate nor useful for many concentrated organic waste streams. However, the regulations require this test as the criteria for setting waste codes.

It is important to note the following:

- 1) Taken alone, no one analysis or set of analyses can or should be used to make broad conclusions, which is why we present data for several years.
- 2) It is still the generator's responsibility to determine the precise waste codes to use on his materials. These data provide useful information on typical wastes.

The first column provides coded information as to which laboratory performed the analysis and the year in which the sample was taken ("90" = 1990). The second column is a code for the site from which the sample was taken. These are explained in an attachment.

If you have any questions, please feel free to call Dennis Brinkman (312)825-7304.

### **Dumpster Mud Wastes**

		* .		þ	hysical Pro	nerties and	TCLP Met	ale Analys	ie nnm				
		Parameter	лH	sg ,				•					
			•		FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
LAB	SITE	Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
M-90	CL		10	na	115	< 0.5	0.85	0.8	0.06	2.2	0.002		
W-90	DE		7	na	80	< 0.05	1	0.84	< 0.05		0.002	< 0.2	< 0.01
W-90	EL		8	na	115	< 0.05	0.9	1	< 0.05	<u>570</u> 1.3	< 0.01	< 0.05	< 0.05
M-90	LE		6.5	na	<u>85</u>	< 0.5	0.47	2	0.01	1.3	< 0.01	< 0.05	< 0.05
C-90	RE		7.9	1.2	<u>85</u>	< 1	0.41	<u>2,8</u>	0.02	4.6	< 0.001	< 0.2	< 0.01
M-90	CL		7.5	na	> 160	< 0.5	0.28	1,3	0.02		< 0.002 < 0.001	< 1	< 0.5
E-91	HE		8	1.503	113	< 1.0	1.2	0.71	< 0.10	<u>8.8</u> 2.4		< 0.2	< 0.01
S-92	CL				92	< 1.90	< 2.60	2	< 0.930		< 0.002	< 0.1	< 0.1
S-92	HE			1.4	<u>130</u>	< 0.45	1.52	<u>2.93</u>	0.06	<u>19</u>	< 0.0250	0.350	< 0.350
S-92	NJ			0.85	116	< 0.94	2.3	1.27	0.31	0.87	< 0.0008	< 0.55	< 0.10
S-92	NY			0.97	125	< 0.57	1.24	1.08	0.31	7.75	< 0.006	< 0.53	< 0.1
N-92	CA72		7.5	0.07	130	< 0.30	0.94			9.46	0.004	< 0.54	0.1
7	J Z			•	788	· 0.50	0.54	1.15	< 0.20	4.01	< 0.05	< 1.0	< 0.40
		MAX	10	1.503	130	0	2.3	2.93	0.31	570	0.004	0	0.1
	•	MIN	6.5	0.85	80	0	0.28	0.71	0.01	0.87	0.002	0	0.1
						;							
			••			IC Dump	ster Mud	699					
					Physical Dr	onadiae an	d TCLP Me	tala Analy	aia nam				
				· ·	ny sicai r i	operiles ari	d ICEP Me	iais Milaly	sis, ppiii				
		Parameter	. pH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
		Reg. Limit	<2; >12.5	па	< 140	5	100	1.	5	5	0.2	1	5
LAB	SITE	·											·
E-91	CL		10.1	1.108	124	< 1.0	1.5	2	2.2	14.9	< 0.002	< 0.1	< 0.1
SW-93	CL		9.83	0.87	144	< 0.50	0.026	0.019	800.0	0.22	< 0.002	< 0.100	< 0.010

										TAIR	~ 0.002	~ Q. I	•
SW-93	CL		9.83	0.87	144	< 0.50	0.026	0.019	800.0	0.22	< 0.002	< 0.100	< 0.
		MAX	10.1	1.108	144	z Ö	1.5	2	2.2	14.9	0	0	
		MIN	9.83	0.87	124	0	0.026	0.019	0.008	0.22	0	0	

### IC Dumpster Mud 609

### Physical Properties and TCLP Metals Analysis, ppm

		Parameter	рH	SG	FP	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
		Reg. Limit	<2; >12.5	na	< 140	5	100	1	5	5	0.2	1	5
LAB	SITE								··	<del></del>			
E-91	CL		8.8	1.313	<u> </u>	< 1.0	0.33	0.87	< 0.1	0.87	< 0.002	< 0.1	< 0.1
		MAX	8.8	1.313	77	0	0.33	0.87	0	0.87	0	0	0
		MIN	8.8	1.313	77	0	0.33	0.87	0	0.87	0	0	0



### CERTIFICATE OF ANNUAL TRAINING

Date of Training: 4.28-93

Name of Training: Annual RCRA Training

Name and Title of Trainer: Ross GIAMBRONE - BRAWH MANAGER

The purpose of this certificate is to document that the employee referenced below was trained on the following listed training topics. This training was conducted in accordance with procedures listed in the Training Section of the affected facility's RCRA Part B permit. This training satisfies the annual training requirements of 40 CFR 264.16(d).

- a. Environmental Regulation Update
- g. Training

b. Part A Application

h. Closure

c. Waste Analysis Plan

- i. Inspections
- d. Preparedness and Prevention Plan
- j. Manifesting/LDR
- e. Contingency Plan and Emergency Procedure
- k. RCRA Part B Permit Review
- f. Spill Response and Spill Reporting

Certification by the employee that training has been received obligates the employee to discharge his/her duties in accordance with the training provided. Failure to comply with the requirements established during the training program may result in civil or criminal penalties against the employee.

Branch Location: OMNOE ARK Branch Number: 30790/

Name and Title of Trainee: Tim Swincharn (Warehouse Man)
(Please Print)

Signature of Trainee, Ling & Munchimbate: 4-28-93

Signature of Trainer: Make Date: 4/28/9

### **EMERGENCY PHONE NUMBERS**

### **Emergency Coordinators**

Title	Name	Address	Home Phone	Office Phone	Веерег
Primary	Russ	933 Short Ridge	904-276-	904 <b>-</b> 264-	904-876-
	Giambrone	Orange Park, FL 32065	2818	2607	2281
First	Kevin	2407 Paisley Court	904-272-	904-264-	904-292-
Alternate	Hamilton	Orange Park, FL. 32605	7477	2607	5613
Second	Edward	29 Westlawn Place	<sup>®</sup> 904-446-	904- <b>2</b> 64-	904-292-
Alternate	Fries	Palm Cost, FL 32137	3604	2607	5614

### **Emergency Notification Phone Numbers**

The state of the s	
Name	Phone Number
Safety-Kleen Environmental Health and Safety Department	708-888-4660 (24-hour number)
National Response Center <sup>1</sup>	800-424-8802
Florida Dept. of Emergency Management (Non-Northeast District offices)	904-488-1320
Northeast District, FDEP, 7825 Baymeadows Way, Suite 200B Jacksonville, FL 32207	904-448-4320 (Monday - Friday, 8:00 a.m 5:00 p.m., except holidays)
Florida Department of Environmental Protection (Tailahassee)	904-488-1900 (24-hour number)

### **Emergency Team to be Notified**

Name	Address	Telephone Number(s)
Clay County Sheriff	901 Orange Avenue Green Cove Spgs., FL 32043	904-264-6512 904-284-7575 or 911
Clay County Public Safety	915 Walnut Street Green Cove Spgs., FL 32243	904-284-6330 or 911
Humana Hospital	2001 Kingsley Avenue Orange Park, FL 32073	904-276-8580 or 911
O.H. Materials Company (Primary Cleanup Contractor)	P.O. Box 551 Findlay, OH 45839-0551	800-537-9540
Ryckman's Emergency Action and Consulting Team (Secondary Cleanup Contractor)	2208 Welsch Industrial Ct. St. Louis, MO 63146	800-325-1398

<sup>&</sup>lt;sup>1</sup>Call NRC only if the Florida Department of Emergency Management cannot be reached.

FOR SERVICE CALL TRANSPORTER

SCHEDULED SERVICE WEEK SCHEDULED SERVICE TERRITORY

REFERENCE NUMBER

· [ 93-32 05

192762 MANIFEST NUMBER

3-079-51-2083-6 BEST PACKERS INC 1122 BRONSON RD

904-264-2607 RUSS GIAMBRONE LOR NOT REG!O 0-220

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1-708-888-4660 (24 hours)

FACILITY SHIPMENT/RECEIVING LOG From Monday, 8/9/93

To Monday, 8/9/93

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P. 3 #1

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FOR SERVICE CALL TRANSPORTER 220-2200 / //1 SCHEDULED SERVICE WEEK 93 36

NAME  $\angle$ 

FED. IL - J. 39-0090018 SCHEDULED SERVICE TERRITORY

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511291

3-079-41-6013-2 MAACO AUTO PAINTING 904-264-2607

RUSS: GTAMBRONE

MANIFEST NUMBER

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### FACILITY SHIPMENT/RECEIVING LOG From Saturday, 9/11/93 To Saturday, 9/11/93

		INCOMI	NG						INCOM	ING	OUTGOING	RECYCLE	ř
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EPA Form 8700-22 (Rev. 9-88) previous editions obsolete

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

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

9

INSTRUCTIONS FOR COMPLETION OF THIS FORM,

### FACILITY SHIPMENT/RECEIVING LOG From Tuesday, 10/12/93 To Tuesday, 10/12/93

CUST#	INCOMING VEHICLE #	DATE	DOCUMENT #	DM TYPE	INCOM   GAL/WT	ING Class		OUTGOING GAL/WT	RECYCLE CENTER	DATE SHIPPED
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### South Carolina Department of Health P.4 #2 and Lovironmental Control Enclosure #6

(6 pages) Enclosure #6

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## South Car in Department of Falth and Environmental Control

UNIFORM HAZARDOUS  Comments of US EPA ID No.	MARKET			n " the " shaded"
WASTE MANIFEST F L D 9 8 4 2 0	5 5 4 6	1746	not required by State law.	by Federal lay,
FLORIDA EAST COAST RAILWAY		ANGER ANGERIA ANGERA		
4: Generator's Prione 704, 295-4255 6. Transporter 1: Company Name 8.	US EPA ID Number	estification of the c		e de la composição de la La composição de la compo
SAFETY-KLEEN CORP. 1 L.D.	0 5 1 0 6 0	4 0 8 2247; 27 7		
9. Designated Pacifity Name and Site Address SAFETY—KLEEN CORP. 0-005-	US EPA ID Number			
130 B FRONTAGE ROAD				
SC 27073 S C D  SC 27073 S C D	0 2 2 3 2 2	4 6 S	7.13	14.
THE WASTE COMPARED, CHEMING, HOULD,	M. H. Salar	No. Type	Total Quantity	VVOI.
(F005) (P0027)	11-5-48	Ma		
FLAMBLE LIQUID ON 263	3, 5, 5, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	1/104	4/7	
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15. Special Heading Instructions and Additional Information 5000 46660	=3=000 <u>0</u> 00 3-	079-01-93	23 4850	11da=
ENERGENCY RESPUTOGE SOS 4660 2447 SKDOT	OB6656_7 1F UNDELIVER	ABUE REIUS	IN TO OTHER	ATCR :
SEC GENERATOR'S CERTIFICATION: I hereby declare that the coments of this consignation for transport by highway according to the content of this consignation for transport by highway according to the content of the co	nment are fully and accurately	described above by prop	per shipping mame and ar regulations and the laws	e classified, packed of the State of South
If I am a large quantity generator, I certify that I have a program in place to reduce the state of the practicable and that I have selected the practicable method is present and future threat to human health and the environment; OR, If I am a generation and select the bast waste management method that is available to	of treatment, storage, or dispussion, is mail quantity described.	cest correctly available avertunde a good faith	to me which minimizes effort to minimize my wi	the state of the Date
DAVID Whales	Stormanure	phalo		Fia
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18. Disseporter 2. Action/edgement or Preceipt of Materials	Muane	1.401	The second secon	71719
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20. EACLITY Owner or Operator: Certification of receipt of hazzardous materials covered by this m Printed/Typed Nume	Signature			

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South Cardina Department of Falth

Bureau of Sond & Hazardous Waste Mgt.

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Proceedings 754 5200 APRIL 2014

STONESCE THE SECTION OF SECTION OF SECTION ed for the on alte (12-plot) type which judget and Core terebol. 188h to 5 to 0 to 2000. Form Approved CAME No. 2000 0038; English 6-30 o Generator's US EPA EX No. information in the shaded areas UNIFORM HAZARDOUS not\_required\_tby::Federal\_law\_a\_but\_dis **WASTE MANIFEST** M JUSZYNSKI ing harman salah kanan dan kanan BRONSWICK; CA 31521 ENVELOPE TRANSPORTE ୁଞ୍ଜୀର ପ୍ୟାପର ଜୀୟ - while he shows SAFETY-KIFFM CORR. CONTRACTON, SC S DOT D and ID Number the of different in wall not NO HAZARDOUS WASTE, LIQUID, R.O.S. Serices of 9 kN3082 PG 111 35-2780 SA PATO (DOTS) (ERG#31) केल्लान्ड पुरारीका सर्व तेडी एस सामान्य प्राप्त Carrier of the designation of the . . . . چهچواه د مختربهای بهدفت جسریهای تردیا مربهای به تابیکای با در تابیکای با در این از در این از در این این این ای The state of the s J-15-13 WARETY - FLECH COR. \*\*\*\*\*\*\*\*\*\* 1. ##\$-##1. \$2000## ####1. \$51. 9.50.00 521 Herris and a settle details \$13 7. 5 EMERGENCY RESP (708) 888-4660 24 HR -002 DEH DOKATTALIS CONTROL #8186574-3: 1.2861269 ್ ಸೂಪ್ರಕ್ಷಣಗಳು ಚಿತ್ರವಾಗಿಸುತ್ತಿಗೆ केलकेच हर्न**्ट** स Maria de la companiona de la companione GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are of and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the If you is large quantity generator, I centry that I have a program in place to reduce the volume and totality of wests generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, atorage, or disposal currently available to the which minimizes the program in place to reduce the volume and totality or wasts generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, atorage, or disposal currently available to the which minimize my wasts program and nature threat to tutore health and the implications of the analysis of the selected that I have made a good faith effort to minimize my wasts. sporter 2 Atknowledgement or Receipt of Meterizi Signature, J. C. to Talescope Soci **イリ <u>地名 (188</u> 1971年) こま**い。 Bridge & SOCIAPING A WINNER े । इस्ति होती **महाराध सम्बन्ध है । इस्ति ।** \$ \$875.40B S (XXI) (A) CHAR YE) DATE: YES THEM OF H FACILITY Owner, or Operator: Certification of receipt of trial actions meterials covered by this

EPA Form 8700-22 (REV. 9/88) Previous Editions are Obsolete (DHEC 1988 REV. 5/8

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		INDOUND	Т	·	<del></del> T	DATE	DATE	TOUT TOUR	End	clos	ure #7 (5 pages)
:	GENERATOR NAME	INBOUND MANIFEST				DATE IN	OUT	OUTBOUND MANIFEST			GENERATOR NAME
#	ford MIR Co.	19385	8		3480	10/29	14/12	7.9385	SC	]	Planous Jech. Is
#2	Au Craft Prod.	79382	1	2001	412	10/89	14/ 1re	79382	SC	]?	Vine Industries
	Vac Con	10749	1	1005	403	14/3/12	11/12	10749	SC	1	Container Corpagen
	Vac Con	10749	4		1685	1/2/92	11/12	10749	SC		Container Corpa
	ST. Augustine Marine	01747	2		600 1	11/2/92	11/12	01747	SC.		Container Coppan
	Jern Ham Chev.	79303	2	For 3	060	112	11/24	49303			Direct Market Cona,
	Direct Maket Conc.	79301		D0/8	4>7	-1/12	-11/24	79301		<u></u>	Lyolix Products
	Mac Japan	79199	1			11/16	11/24	79199	<u>SC:</u>	-	anderson Columbia
	mac Paper	79199	!	D001		4'	11/24	1999	SC.	-	Celica Menting
	Tutwiler Cadilliac	79332	6	poor 2		$\tau \tau - \tau$	11/24	82760	SC	1	Gul Jech Inter
ļ	Allied Printing	82760	-32	D00 1 2 F 005 D00 1 10	287	1120	11/24	82759	SC_ SC	1	actor Troduck
1	Exact INC.	- · · ·	2	1 1	1	1' 1	11/24	0.4	عب (۲)	1	A MID
ر انول	Kextackaging	76006	0	D018 4		7	20 1	799901	SO?		AMID
45	Direct Norket Concepts	79301 79303	2	Fais Dail 6		7	1/29	EN9303	9r,		Amco
#	Jerry Ham Cher Fla. Sun Printing	79323	5	D011 4		11/9	וושוו	19323	Tenn)	1	Amoo
	mastasia awertish	72981	1	D00 19		4د/ا	11 24	72981	SC.		Rivers Body act
	Million and Millio	101	-		1	1/2	11/00			d	BAlderson
	Cardiac Control	79379	1	F001 6	15 1	1/23	11/24	79379	SC	()	powley Maritinel
	Sea Ray Goat	79331	1	F005 D001 3		11/23	11/24	79331	SC		Balderson
İ	Sia Ray Boat	79331	3	0001		11/23	1/24	79331	SC		Trocio Jech Inc
	Harida Charle	01746	1	1.00g	117 1	2/2		-79379	SQ2		CAPA Inc.
J#)	"Roridadust Cerest	01746		Fas	117	12/2	Keturue toessti	21746	SOU		SAPA
480	LOUDAGE STERRET SUCK Buster Design DILLOMING MILLOWATION	M9269		P001 3	384,	0/3	Oz 5-1041		Scy	ノ	Hercules
KIN .	Gel Lany Melble Creation	79320	Ш	DXO1 4	121 1	44	12/10		SC Y		Van Con
Į.	Scaley Cabinet	79207	1	F083			12/10		SC	2	legasus
	Arquan Marticolo	65442	1			· 1 · 1	12/10		50-9	14	witco Coop
	Matheny Imports	157526	1	D6/8	75 /s	' . ·	12/16		<u>50</u>	´	Hing Edward Cyp
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ļ	arguar Plastics	65442	<u>/                                    </u>		107 /	' 1	12/10		<u>5</u> C		XOUL INC.
·	Cenderson Columbiato	79373	1		- 1	2/14	' '		Sc	-	Revion
ļ	Vac Con	79408	1	Dog().		اناد	12/17	.CIUJXIIX	SC		Hirtroducts_
ļ	Yac Con		4	F005/6			13/17/		<u>SC</u>	7	fry Hamcher
	Kex Packaging	23726	1/2			2/15		_	50		Jerry Hamulber
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BOUND			GENERATOR NAME	INBOUND MANIFEST	#	Ib.	co	તિહ	DATE	DATE	MANIFEST	
607 1X			Storter Printing	16275	3	1224	100/	1	9/28	9/30	16275	SC
252 SC			ATOT	96012	2	824	1	51/0/1	9/29	7/30	96012	TX
645 SC			JERRY HAMM Chevrolet	90888	2	733	0001		9/29	9/30		SC
623 NJ			CRUBBLY MARYTHE CORP	14620	2	682	1003	FOLE DOJS	7/30	9/30	14620	SC
1647 SC	,		St. Johns RIVER PARK	52089	i	- 00	ומא	F-03	9/30	10/7	52089	SC
215 1			DAN VADENCHEV.	96023	3	199	DUZZI		1	10/7	96023	12C
523 K			Georgia Parific	79025	2	360			10/1	R52-	79025	SC
162 K	410		SEOTIFIE PACIFICY	90853	$\perp L$	36k	<del> </del>		10/,		90853	No.
635 S	"   P	ડ જ	Georgia Prestie	76002	1	289	8100	1	'//		96002	30
636 R		_	Georgia Pacific Y	96027	1	130	DUS	011	10/1	V	96027	7×
1859 KY			PRECED Tech INC	95858	4	1616	1015		10/,	10/7	95858	SC
538 56			Gold Plating Jute	96003	2	560	0007		10/4	107	96003	NJ
856 TX			Cee PRINTING	96029	2	766	boll		10/4	197	96029	NJ
971 SC			AMOCO	14622	$\perp$	85	DOIS FOOI	0002	10/5	10/7	14622	KY
053 SC	_		Atkins Tech	14649	1	1112	F102	waz	10/5	1017	14649	74
369 SC			VACCON	97936	5	T	8100		-, 0	10/7	97936	SC
046 SC			Kelsey Hayes	96025	1	163	DO18		10/6	147	76025	SC
870 NJ			Constainer GRP-MILL	96031	2	808	F005		10/6	10/7	96031	Se
305 SC			CONTAINER COLP-MILL	96032	4	1166	F005		10/6	10/1	96032	KY J
741 50			VACCON'	97936	5	JUN						
St K	4		AMERICAN TOURISHER INC	96045	2		2008		10/7	10/7	76045	50
861 SC.			Nationwide Ins.	96019	2		603 000 i		10/8	10/22	26019	Ky
376 SC.	英		Anderson Culumbiaco.	98043	1	ऽ१ऽ	F002		148	10/5/	58813	30
179 SC	۲ ۲	<b>,</b>	Georgia Pacific Curp	96049	1	154	8100		10/11	10/21	96049	SC 1
108 SC	1		Appropriate Products Co.	96030		412	F605 DOG		10/12	16/21	96030	SC
105 SC			JAMES RIVER CORP.	60520	2	Š3.5	me		10/13	144	60520	SC.
21 Ky			Container Coupe & America	65409	1	392	POLY		11-1	14/4	65409	K/
20 b Sc 189 SC		ŀ	ISCCCA	65411	4	1573	DCC1	Do 18 1	413	421	65411	*/
289 SC			enith Products	9805 k	İ	354	2001			14/21	98056	<u> </u>
85 SC 87 KY 85 SC			ANASTASIA ADU ART	79021	1	417	1000		14/14/		7902/	SC
87 KY			ARCINIL INC.	60527	1	430	705 F	203/		15/21	60527	SC
165 SC				65417		5520 l		14	0/15 /	421	65417	IX
104 50		K		65418	1	\$77	ous	1	45	421	65418	KY
134 SC 133 SC	שח	1	Econant Printing	14631		4390			1/5 /		14631	KY KY
133 SC	<u>.</u>			65408		426		1	415/		65408	St.
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	GENERATOR NAME	INBOUND MANIFEST					DATE	דטס			_
	GEORGIA PACIFIC	65279	2	12018	?	793	7/30	8/5	65279	SC	_
	Wire MILL INC	65282	2	12018	<u> </u>	641	7/29		65282	SC	
	Partition Services	3/246	1	\$00) 0001		398	7/29		31246	SC	
	Alstate Steel Co	65286	1	0018	<u> </u>	167	7/30	8/5	65286	SC	
_	INK KEAFT	65283	2	0011		833	8/2	8-11	45283	TX	
	Direct MARKET Courents	65281	1	1412	<u> </u>	411	8/2	8/5	65281	SC	_
	VAC CON	45186	3	F005	P0 32	1150	8/3	8/5	45186	SC	
3	ACME PRINTING	995L5	2	00/1		833	8/3	8-11	65283	太	:
	Kelsey Hayes	14602	1	2018	<u> </u>	424	8/3	8/5	14602	KY	
	Pegasus tech	72555	3	F001	<u> </u>	1125	8/3	8/5	72555	KY	
i	Pegnous Tech	14601	1	DO11 2007	ļ	210	43	8/5	1460 (	TX	
	Handi Kup Co.	65284	1	0018		458	8/4	8/5	65284	SC	
	Crawley Mristime Corp	80428	4	000/	Fac5 0035	1228	8/4	8/5	80428	SC	
	SWISHER TUTL GOARD	65264	1	2018		202	8/4	8/5	65264	SC	
	SALLY CORP	80442	2	POOF DOOL	F03 0035	288	8/4	8/5	80442	SC	
	CoCACula Bottling	65290	1	FOOT		229	8/4	8/5	65290	KY	
	Mr. Paperco	65285	4	F003		1082	8/6	8/11	65285	s'C	
	Duplex Products INC	13835	1	1000		490	8/6		13835	22	
	DAN VALON Chevalet	80431	2.	F005 0001	FW3	660	8/5		80431	SC	
	AIRCRAFT PROJUCTS CO	29325	2	FUS UUS		749	8/10		29325	SC	
	DIMED 7 LEACE	65300	3	1200/		1328 1328	8/10		65300	30	
	HALD Automotive Machine	80437	2	Dio2 OUTSI	10H	966	8/11		80437	TX	
	St. Augustine Tech Schiol	65289	1	WISI.		458	8/11	T.	65289	及	
	Pegasus Tech Inc	14619	2	02/18			8/4	PUI	14619	KУ	
1	J.A.SWISHER - SONS	65266 <sup>8</sup>	1	Dooi		238	8/12	8/19	65266B	SC	1
	The TRAME Co.	99524	2	Fooi			8/12		99524	SC	1
	Swisher-Kino OD DIV	65266A	4	2018			8/12		65266A	KY	1
	Swisher-King & Div Winn Dixie Stoles	45287	ī	F005 2001	FO23	197	8/12		65287	35	1
	WINN DILIESTORES	14617	1	800		249			14617	SC	1
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t	Bethesta Chentini Coth	14641	j	1003		333	8/2	1	14641	KV	1
K	Stanley FANS INC	80436	3	ROS	F103	1013	8/20	-	804.56	SO	1
	CLARKE AMERICAN	1463	1	FOUL		340	8/20		14603	Ž.	1
ħ	r	90852		FUZ FOS			8/23	_	90852	<u>3</u> C	1
f	<i>a</i> 'l	26160	<u>.</u> 5	F003 F003 BUU(			8/24	-		5C	1
1	AMERICAN TOURISTERTAL		1	שטערן			8/24	-	90851	SC-	Ļ
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	RACT INC	20359	<del>-/,  </del>		243	125	8/24	8/20	20359	Jc -	9 2 4 6
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	GENERATOR NAME	INBOUND MANIFEST					DAT	OL	JΤ	OUTBOUN MANIFEST		
	Georgia PACIFIC	65279	1	1 100	18	$\gamma_{i}$	3 7/30	8/2	;	65279	SC	-
	Wire mill INC	65282	2	וסכו		CY	17/29			65282	SC	, 
	Paration Services	3/24/6	1	F00		398	3 7/29			3/246	50	2
	Alstate Steel Co	65286	1	DOI 8		167	7/30	8/	<u>S</u>	65286		
	TNK KEAFT	65283	2	0011	'	833	38/2	3-	11 "	45283	IX	<u>`</u>
	Direct MARKET CARRESTS	65281	1	144		4/11	8/2	8/6	<u></u>	65281	SC	
	VAC CON	45186	3	F00.5	5 Do i	S 1150	8/3	8/5	<u> </u>	45186	SC	<u>ب</u>
	ACME PRINTING	99515	2	00/1		833	83	8-	11	65283	TX	<u>^</u>
	Kelsey Hayes	14602	11	DOIS	:	424	8/3	8/5	-	14602	(X)	<u>/</u>
	Pegasos tech	72555	2	F001		1125	8/3	8/5	-	72555	K)	_
	Pegasus Tech	14601	1	D011		\$10		8/5		1460 1	17	<u> </u>
	HANDI KUP Co.	65284	1	2018		458		18/5		65284	SC	
k	Rowley Mointime Corp	80428	4	000/ 60/3			<del>                                     </del>	175	_	80428	SC	_
19	WISKER INTLEMENT	65264	1	1001/		202	8/4	8/5	5	65264	SC	_
[	SAlly Corp	80442	2	700 F	1003 <u>:</u>	S IXX	8/4	8/5	_	80445	50	$\dashv$
K	Cacola Bottling	65290	$\perp I$	60/	763 FU3	229	8/4	18/5		65290	KY	$\Box$
	AR PAPERCO	65285	14	Po 01		1082	1 - 1 F	8/11		65285	5'0	_
1	Juple is moduce INC	13835	1	1000	1	470		$\bot \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \! \!$	_	13835	22	_
	DAN UNDON Cheurelet	80431	2	0001	FUU3	660	8/5	11_	4	80431	SC	_
1	AIRCRAFT Products Co	29325	2	FOUS OVO!	_	749	8/10		_6	29325	SC	_
12	OMED TREACE	65300	3	100/		1328	8/10		_	65300	30	$\Box$
P	talbacturative Machine	80437	2	0015	HOL	966	8/4	$\bot$		70437	7x	
	it. Augustine Tach School	65289	1	Duil UUTSI	1511	458	8/1/		(	·528-7	X	_
1/	egasus Tech Inc	14619	2	12/18		1063	8/4	18/11		14619	KY	
1	A.SWISHER SONS	65266B	1	Dooi	<u> </u>	238		8/19	<u>.</u>	65266B	Sc	_
1	heTRAME Co.	99524	2	Fooi			8/12		'	99524	SC	
12	Wisher-King & DIV	65266A	4	2018		1612	8/12		_(	52664	KY	
$+\mu$	DINIO DIXIO - IDLES	65287	1	F005	FOOS	197	8/12		_{	65287	3C 3C	,
U	Jun Dixiestores	14617	1	1018		249	8/12			14617	SC	╛
1	Inegale Outdook Hav	80260	1	Wa		356	8/12	8/19	_ \{	70260	SC	
1	CAPRING MARINE IN	14642	4	Fe03 DUD/		1214	8/19	8/26		14642	SC	
B	ethes a Cheptian (with	14641	Ì	1003		333	\$/20		$\perp i$	14641	KY	
3	tabley faus. Inc	80436	3	FLOS DUUI	1263 10035	1093	8/20		$\prod$	F0436	SO	
0	LARKE AMERICAN	14663	1	FUL		340	8/20			14603	C	
M	·	70852	i	7005 F003	1		8/23			90852	<u>JC</u>	
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R	MYRKAN TOWNISTER THE	90851		D04:		471	8/24	$\int$	_			×
Va	psened Plantico Fre	20361	1	we		407	72,4	$\int$	_	0361	K	9-
4	act INC	20359	1	25 1	203	125	8/24	8/20		0359	SC	se

. * SK/DOT	0001009 WAST	E XYLENE	3 UN13	07 PG II			F003	D001				
45-110893 35-1-10893	311090009473	E XYLENE M.I.T ELECTRIC CORP	3079019510	M61215	:	м61215∰	A Contract	630.	402.00	P.//	DM #	
\$ 5 K7 DDT	0001035 но н	IAZARDOUS HASTET SUELD, NOO. S.	05 AM - Part - F	77-pg-1161	(OOOLATERGES):)	igu inter	DOO1		Bearing .			, 44 ,
100093	310050011198	AZAKUUUS-AASAEEFSISUUS AARUUSICE SHISHER JAAC	3079018080	801108	оболи	0.01008		ំ១០	-1 <b>,</b> 0,00	g.		, a
				2.1		1.0						p
<u> </u>									, = = = <del>=</del> = = :			
<u>* sk/DaT</u> .	0001038 RQ W	NASTE PETROLEUM DIL	3 UN12	70 PG III			D001					
110293 3 110293 3	311030009238 311030009277	GEORGIA PACIFIC CORP GEORGIA PACIFIC CORP	3079019416 3079019416	M41113 M41113	110393 110393 110393 110393 110393 12-9-93-122193 12-9-93-122193	M41113 M41113		630 630	406.00 406.00		D M D M	
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13-1-20393 :	312070007541	GEORGIA PACIFIC CORP GEORGIA PACIFIC CORP GEORGIA PACIFIC CORP	3079019416 3079019416 3079019416	M41113 M19558 M19558 40	12-9-93 1221-93	M41113 M19558 M19558		630 630	407.00 317.00 317.00	₽	DM DM	·
25-9-74					5-9-94		•				· · ·	-4
	700100104454	HAZARDOUS WASTE, SULIB, N.D.S.	9 NA30	77 PG 111	(F001)(ERG#31)		F001_				7 h	
. 120195 .	308180185458	CUCH CULH BUTTETING CU	3079019452	MO1194	120193	MO1194		830	229.00	19		
* SK/DUT	0001049 RQ F	HAZARDOUS WASTE, SOLID, N.O.S.	9 NA30	77 PG III	(D008) (ERG#31)	W	0008		207.00			A The
			<del>-</del>		••••				287.00	·	U M	
		AZARDOUS WASTE, LIQUID, N.O.S.								_		
122193	312220009243 312220009329	CONTAINER CORP OF AMERICA	3079019433 3079019433	M19569 M19569	010494 010494	M19569 M19569	<u> </u>	630 630	353.00 353.00		DM DM	
* SK/DUT	0001073 WAST	TE OIL	(NOT U	ISDOT HAZAF	RDOUS MATERIAL)	)	NONE	NHZ	<u> </u>			
+111093	311110091237	VANGUARD PLASTIC INC CONTAINER CORP OF AMER SCAPA INC SCAPA INC	3079019334	M61208	111093	M61208		630	407.00 407.00	P	DM DM	
+111793	311180085166 312170003858	SCAPA INC	3079019292 3079019292	M65410	111893	M65410 95211		630 630	353.00 388.00	P	DM DM	
				·								
		WASTE PETROLEUM DIL THE TRANE CO THE TRANE CO							412.00	P	DM	<del></del>
110493	311050010564	THE TRANE CO	3079019372	024720	111093 111093	024720		630	412.00	P :	DM	
	• ••	WASTE PETROLEUM DISTILLATES, N.						,				
111093 111693	311110091415 311170183958	NAEGELE SIGNS STORTER PRINTING	3079014092 3079019331	M61219 942852	111093 111893	M61219 942852	,	630 630	357.00 385.00	P	<u>D</u> ₩	and the same of the same server
111793 112293	311180085383 311230095978	NAEGELE SIGNS STORTER PRINTING SCAPA INC ADAMS REMCO INC STORTER PRINTING	3079019292 3079019457	M65422 M61154	111893 112493	M65422 M61154	the second	630 630	324.00 330.00	P .	DM DM	
122893	215540004685	SIURIER PRINTING	3079019331	595215	010494	595215		630	300.00	· · · · ·	DM.	
* SK/DOT	0001097 RQ I	WASTE INK	3, UN1	210 PG III			0001					
111693 111693	311170183973 311170183973 311170183985	STORTER PRINTING STORTER PRINTING	3079012417 3079019331 3079019331	942852 942852	111093 111893 111893	942852		630 630 630		) P	DM	
111893 122893	311190016059 312290009694	FLORIDA BINDERY STORTER PRINTING	3079019469 3079019331	267606 595215	010494	267606 595215		630 630	481.00	)P	D M D-M	
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* SK/DOT	0001103 RQ	WASTE PAINT RELATED MATERIAL	3 UN1	263 PG II			D001					
111893	308180223645	THE SHERWIN WILLIAMS CO	3079019533	M61156	111893	M61156		630	431.00	) Р	DM	
111893	308180223657	THE SHERWIN WILLIAMS CO THE SHERWIN WILLIAMS CO	3079019533	M61156 M61156	111893 111893 111893	M61156 M61156		630	431.00	) P	DM T	
* THIS	INFORMATION	DESCRIBES THE CONTAINERS OF WAS	STE LISTED IM	MEDIATELY	BELOW THE S/K	• TOO						