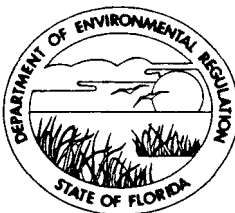


STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER

December 11, 1986

CERTIFIED - RETURN RECEIPT

Ellen J. Jurczak, P.E.
Safety-Kleen
777 Big Timber Road
Elgin, Illinois 60120

RECEIVED

DEC 12 1986

Hazardous Waste

Dear Ms. Jurczak:

Safety-Kleen
FLD 980 847 214
Construction Permit Application HCL0-128082
Clay County - Hazardous Waste

This letter is to follow up our telephone conversation of December 9, 1986. At that time I explained that the State of Florida requires that both a construction permit and an operation permit be issued before Safety-Kleen may begin storing hazardous waste for longer than ten days in the newly constructed paint waste transfer facility. The agreement which Mr. Walczynski negotiated with our Tallahassee staff last February to allow Safety-Kleen to operate as a storage facility during the application process included only the facility which existed at that time. Until the appropriate applications are issued, Safety-Kleen may operate the new paint waste facility only as a transfer station (less than ten days storage).

In your letter of November 12, 1986, you indicated that you believe that the new container storage area has interim status. That facility would have interim status only if you have amended your Part A application on file with EPA. Interim status is granted by EPA on a unit-by-unit basis, rather than on a waste-by-waste basis. Simply including the paint waste stream in your application does not affect interim status. Also, the Florida hazardous waste permitting program does not include the concept of interim status. To satisfy the federal requirements, you should contact EPA - Region IV and amend your existing Part A.

Because you have amended the State application form 17-1.207(3) to include construction and submitted the application fee of \$1000, you have already filed for a construction permit. A Notice of Deficiency (NOD) is currently being prepared to request additional information on the new facility.

Ms. Ellen J. Jurczak, P.E.
December 11, 1986
Page two

As one last point of clarification, the applications which Safety-Kleen has with the State of Florida are not considered to be Part B applications as your letter indicated. Part B's are applications made to EPA. These federal permit applications for your type of facility (container and tank storage) are not yet due.

If you have further questions, please call me at (904) 798-4200 or write to the letterhead address.

Sincerely,

Vicky G. Valade
Vicky G. Valade
Environmental Supervisor

off
VGv:jf

cc: Satish Kastury
Paul Johnson