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June 20, 1986  
SAW 86-306

SOLID WASTE  
SUBSECTION

Mr. Raoul Clarke  
Bureau of Hazardous Waste Management  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32301

Re: Safety-Kleen Corp.

Dear Mr. Clarke:

Thank you for your letter of May 1, 1986 documenting the status of our facilities in Florida. As you and Mr. Kastury directed us, we have been meeting with each of the District Engineers to discuss the individual sites specifically. In addition, we have adhered to the permit application submittal schedule to which we agreed.

We wish to clarify our operations at the Tampa facility and confirm its status. As you are aware, the facility in Tampa  
→ (FLD 980 847 214) was in existence on the effective date of new regulations which required the facility to obtain a permit. The full extent of the facility was still under construction and as such, the Department is requiring us to obtain a construction permit as well as an operating permit. Until the facility is issued an operating permit, the Department wants the facility operated as a transfer facility. [This includes the storage and notification requirements of the new Transfer Facility regulations].

Safety-Kleen agrees to this operational status but with three procedural clarifications:

- (1) The facility will be allowed to bulk the mineral spirits.
- (2) The manifests (normally two-part uniform manifests from SQG's) from customers will be truncated at the facility. And shipments made from the facility to the recycle center will use a full 6-part manifest (as appropriate for shipments to South Carolina).

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- (3) Materials will be shipped off within 10 days of receipt.

The use of the bulk tank will provide for safer, more efficient handling of the mineral spirits and be commensurate with our normal handling capabilities.

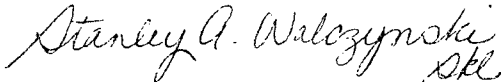
The remanifesting of materials from the facility is important since shipments are made to Lexington, South Carolina. South Carolina requires full manifesting of generators of 100 kg./mo. or more and further requires individual authorization numbers from each generator shipping to a facility in the state. The paperwork burden this would place on Florida businesses would be significant.

We trust the Department can appreciate the importance of these procedures.

A Closure Permit Application for the old Tampa facility is being submitted. There was a delay caused by obtaining the proper certifications, but we have worked with Mr. Gonzales of the District office to circumvent this delay.

We appreciate your continued assistance. If you have any questions, please contact me at (312) 697-8460, extension 2242.

Very truly yours,



Stanley A. Walczynski, P.E.  
Regional Environmental Engineer

SAW:skl

cc: Scott Fore  
Earle Witt  
Gerry Daly  
Br. Mgr. 3-163-01  
Terry Becker, Reg. Mgr.  
Ellen Jurczak  
Mr. Dale Stitik, FL DER