

Pedigo, Leslie

From: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Sent: Thursday, March 29, 2018 5:09 PM
To: Pedigo, Leslie
Subject: "SK Tampa Compliance Assistance Response Letter"
Attachments: FDEP SW District Compliance Assistance Offer Response Letter 3-29-18.pdf

Hi Leslie,

Attached is our response letter to the Department's March 16, 2018 Compliance Assistance Offer letter. Please send me a reply that this correspondence was received when you have a chance. Let me know if you have any questions, or require additional information.

Thank you, Jeff

Jeff Curtis Sr. Environmental Compliance Mgr. | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.600.3076 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



Safety Starts With Me! Live it 3-6-5



March 29, 2018

Delivered via E-mail

Leslie Pedigo
Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

RE: Compliance Assistance Offer
Safety-Kleen Systems – Tampa Facility
HW Facility ID #FLD980847271
Hillsborough County

Dear Ms. Pedigo:

The purpose of this letter is to respond in writing to the matters set forth in the Compliance Assistance Offer letter dated March 16, 2018 regarding the Department's concerns at the Safety-Kleen Systems, Inc., Tampa facility ("Safety-Kleen") as a result of the Department's RCRA Compliance Evaluation Inspection on February 20th and 23rd, 2018. Our 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 the Company in any administrative or judicial proceeding. The Company expressly reserves any and all defenses it might have to the matters set forth in your letter and does not intend to waive any of those defenses by making this response.

Our responses follow the sequence of the items set forth in your March 16, 2018 inspection Report

New Potential Violations and Areas of Concern:

Type:	Violation
Rule:	264.76(a)
Explanation:	Twelve drums in the Flammable and Transfer Waste Storage Area from Feld Motors Sports, dated January 27, 2018, were labeled as empty. However, during the February 20, 2018 site visit, a number of these drums were examined and found not to be empty. Subsequently, SK staff determined that eight of these drums were not empty but contained methanol waste; proper waste labels were added to the eight drums; the drums were re-profiled and proper manifest documents were prepared; and SK's drivers were retrained on determining when drums can be considered empty.

Proposed Action:

If a facility accepts waste for treatment, storage or disposal any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper as described by 263.20(e) of this chapter, and if the waste is not excluded from manifest requirement by this chapter, then the owner or operator must prepare and submit a letter to the Regional Administrator within 15 days after receiving the waste. The unmanifested waste report must include the following information:

- (1) The EPA identification number, name, and address of the facility;
- (2) The date the facility received the waste;
- (3) The EPA identification number, name and address of the generator and the transporter, if available;
- (4) A description and quantity of each unmanifested hazardous waste the facility received;
- (5) The method of treatment, storage, or disposal for each hazardous waste;
- (6) The certification signed by the owner or operator of the facility or his authorized representative, and;
- (7) A brief explanation of why the waste was unmanifested, if known.

Please provide an unmanifested waste report to the Department within 15 days.

SK Response: Safety-Kleen contacted Feld Motor Sports regarding the material in the eight drums that were picked up as empty, but were found not to be empty during the Department's inspection. The material in the drums was determined to be methanol from fuel change outs on their trucks. The material was re-profiled as RCRA exempt commercial chemical product, which is fuel under 40 CFR 261.2(c)(2)(ii). Commercial chemical products are not hazardous waste and do not require a hazardous waste manifest, therefore an unmanifested waste report was not submitted. Rather, a copy of the profile and shipping document utilized are enclosed. All branch employees with the responsibility of collecting or receiving empty containers have undergone refresher training. A copy of the re-training certification and empty container checklist for employees involved in handling empty containers at the Safety-Kleen Tampa facility is also enclosed.

Type: Violation

Rule: 279.46(b)(5)(i)

Explanation: Chris Abel is signing the used oil shipping records on behalf of CSX.

Proposed Action: Used oil transporters must keep a record of each shipment of used oil that is delivered to another used oil transporter, or used oil burner, processor/re-refiner, or disposal facility. Records of each delivery must include:

- (5) The signature, dated upon receipt of the used oil, of a representative of the receiving facility or transporter.

Documentation from CSX stating that Mr. Abel is authorized to sign on their

behalf needs to be submitted to the Department within 15 days.

SK Response: The process for the Safety-Kleen (SK) Tampa facility shipping used oil to its' final processing facility at the Safety-Kleen East Chicago, IN re-refinery is as follows. Safety-Kleen Tampa used oil collection trucks deliver their loads to the CSX Tampa Transflo Terminal for off-load into designated rail cars. Each off-load is delivered to CSX Tampa Transflo using an Oil Services/Waste Tracking document. The SK used oil service representative delivers his/her load to the rail car at Transflo on this document and signs as transporter 1. A Transflo representative receiving the load signs this document as transporter 2, and the truck is off-loaded into the rail car. Once the rail car is full and ready for shipment, CSX National Transportation is notified to pick up the car for transport to East Chicago. This shipment is documented on the Straight Bill of Lading forms the Department reviewed during their inspection, where Chris Abel was signing on behalf of CSX Transflo Tampa. Enclosed are copies of each of the shipping documents the SK Tampa facility is using as records of delivery. The Oil Service/Waste Tracking document used to deliver the used oil shipment to CSX Tampa Transflo meets the requirements 40 CFR Part 279.46(b)(5)(i). The branch personnel may not have provided these documents to the Department at the time of inspection. After speaking with Beth Knauss and reviewing the process above, going forward the Tampa branch will attach copies of the Oil Services/Waste Tracking documents used to deliver our used oil to Transflo to the applicable Straight Bill of Lading shipping document for the railcar associated with the used oil shipment.

Safety-Kleen appreciates the opportunity to discuss the Department's concerns. If you have any questions regarding this submittal, or would like to review the process for our used oil shipments through the CSX Tampa Transflo terminal further, please contact me at (561) 523-4719.

Best regards,



Jeff Curtis
Senior Environmental Compliance Manager
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, FL 33426

Enclosure(s): Feld Motor Sports profile/shipping document, refresher training documents, used oil shipping documents

TSM

SK SHIP# 224900462✓

185177797

Form Approved OMB No. 2050-0039

Please print or type (Form designed for use on elite (12-pitch) typewriter)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000197376	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 006217238 SKS		
5. Generator's Name and Mailing Address Feld Motor Sports 2001 Us Hwy 301 PALMETTO Generator's Phone: 941-721-1200		Generator's Site Address (if different than mailing address) Feld Motor Sports 2001 Us Highway 301 PALMETTO FL 34221-6517					
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS INC		U.S. EPA ID Number TXR000081205					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 Facility's Phone: 502-845-2453		U.S. EPA ID Number KYD053348108					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol	13. Waste Codes	
		No.	Type				
	X 1 UN1230, METHANOL, 3, PG II	8	DM	320	P	NONE	
	2						
	3						
4							
14. Special Handling Instructions and Additional Information: TSD:SMR 76303822 FE14511 CSG:							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Bryan R. Brown		Signature 		Month Day Year 3 6 18			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name PAUL CATH... Transporter 2 Printed/Typed Name		Signature 		Month Day Year 3 6 18			
18. Discrepancy							
18a. Discrepancy Indication Space		<input type="checkbox"/> Quantity	<input type="checkbox"/> Type	<input type="checkbox"/> Residue	<input type="checkbox"/> Partial Rejection	<input type="checkbox"/> Full Rejection	
18b. Alternate Facility (or Generator)		Manifest Reference Number				U.S. EPA ID Number	
Facility's Phone:							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a		Signature				Month Day Year	
Printed/Typed Name:							

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #

FLR000197376

GENERATOR NAME:

Feld Motor Sports

GENERATOR CODE (Assigned by Clean Harbors)

FE14511

CITY Palmetto

STATE/PROVINCE FL

ZIP/POSTAL CODE

34221

ADDRESS 2001 Us Highway 301

PHONE: (941) 721-1200

CUSTOMER CODE (Assigned by Clean Harbors)

SA23175

CUSTOMER NAME:

Safety Kleen Motorsports

ADDRESS 182 Armistead Road Attn: Buddy Judy

CITY Rockwell

STATE/PROVINCE NC

ZIP/POSTAL CODE

28138

B. WASTE DESCRIPTION

WASTE DESCRIPTION: Racing Fuel

PROCESS GENERATING WASTE:

Fuel Change Outs on Trucks

THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? No

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID <input checked="" type="checkbox"/> LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	NUMBER OF PHASES/LAYERS <input checked="" type="checkbox"/> 1 2 3 TOP 0.00 % BY VOLUME (Approx.) MIDDLE 0.00 BOTTOM 0.00				VISCOSITY (If liquid present) <input checked="" type="checkbox"/> 1 - 100 (e.g. Water) 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000	COLOR <u>Clear</u>
	ODOR NONE MILD <input checked="" type="checkbox"/> STRONG Describe: <u>Pungent</u>		BOILING POINT °F (°C) <= 95 (<=35) 95 - 100 (35-38) 101 - 129 (38-54) <input checked="" type="checkbox"/> >= 130 (>54)		MELTING POINT °F (°C) < 140 (<60) 140-200 (60-93) > 200 (>93)	TOTAL ORGANIC CARBON <= 1% 1-9% <input checked="" type="checkbox"/> >= 10%
	FLASH POINT °F (°C) <input checked="" type="checkbox"/> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) > 200 (>93)	pH <= 2 2.1 - 6.9 <input checked="" type="checkbox"/> 7 (Neutral) 7.1 - 12.4 >= 12.5	SPECIFIC GRAVITY <input checked="" type="checkbox"/> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)	ASH < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0 <input checked="" type="checkbox"/> > 20 Unknown	BTU/LB (MJ/kg) < 2,000 (<4.6) 2,000-5,000 (4.6-11.8) <input checked="" type="checkbox"/> 5,000-10,000 (11.6-23.2) > 10,000 (>23.2) Actual:	

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL

METHANOL

MIN	--	MAX	UOM
100.0000000	--	100.0000000	%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR 12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NODOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING: ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE.

G09

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE W219

E. CONSTITUENTS

Are these values based on testing or knowledge?

Knowledge

Testing

If constituent concentrations are based on analytical testing, analysis must be provided. Please attach document(s) using the link on the Submit tab

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>

VOLATILE COMPOUNDS			OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
D018	BENZENE	0.5	BROMINE			<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5	CHLORINE			<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0	FLUORINE			<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0	IODINE			<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5	SULFUR			<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7	POTASSIUM			<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0	SODIUM			<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7	AMMONIA			<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5	CYANIDE AMENABLE			<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2	CYANIDE REACTIVE			<input checked="" type="checkbox"/>
			CYANIDE TOTAL			<input checked="" type="checkbox"/>
			SULFIDE REACTIVE			<input checked="" type="checkbox"/>

SEMI-VOLATILE COMPOUNDS		
D023	o-CRESOL	200.0
D024	m-CRESOL	200.0
D025	p-CRESOL	200.0
D026	CRESOL (TOTAL)	200.0
D027	1,4-DICHLOROBENZENE	7.5
D030	2,4-DINITROTOLUENE	0.13
D032	HEXACHLOROBENZENE	0.13
D033	HEXACHLOROBUTADIENE	0.5
D034	HEXACHLOROETHANE	3.0
D036	NITROBENZENE	2.0
D037	PENTACHLOROPHENOL	100.0
D038	PYRIDINE	5.0
D041	2,4,5-TRICHLOROPHENOL	400.0
D042	2,4,6-TRICHLOROPHENOL	2.0

PESTICIDES AND HERBICIDES		
D012	ENDRIN	0.02
D013	LINDANE	0.4
D014	METHOXYCHLOR	10.0
D015	TOXAPHENE	0.5
D016	2,4-D	10.0
D017	2,4,5-TP (SILVEX)	1.0
D020	CHLORDANE	0.03
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008

HOCs

- ☒ NONE
☐ < 1000 PPM
☐ >= 1000 PPM

PCBs

- ☒ NONE
☐ < 50 PPM
☐ >=50 PPM

IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☒ NO

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCES

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS

POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL

☒ NONE OF THE ABOVE

REGULATORY STATUS

YES ☒ NO USEPA HAZARDOUS WASTE?

YES ☒ NO DO ANY STATE WASTE CODES APPLY?

Texas Waste Code

YES ☒ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

☒ YES NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?

LDR CATEGORY: **Subject to a variance or exemption**
VARIANCE INFO: **RCRA exempt commercial product, which is fuel (40 CFR 261.2(c)(2)(ii))**

YES ☒ NO IS THIS A UNIVERSAL WASTE?

YES ☒ NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS VERY SMALL QUANTITY GENERATOR (VSQG) OR A STATE EQUIVALENT DESIGNATION?

YES ☒ NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☒ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

☒ YES NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS ≥ 500 PPM?

☒ YES NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE $\geq .3$ KPA (.044 PSIA)?

YES ☒ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☒ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE?

YES ☒ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?

Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?

YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?

YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) > 10 Mg/year?

What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)

The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing

Describe the knowledge

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

UN1230, METHANOL, 3, PG II

I. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY ☒ OTHER **As Needed**

<input checked="" type="checkbox"/> CONTAINERIZED		BULK LIQUID		BULK SOLID	
1-1 CONTAINERS/SHIPMENT		GALLONS/SHIPMENT: 0 Min - 0 Max	GAL.	SHIPMENT UOM:	TON YARD
CONTAINER TYPE:		TONS/YARDS/SHIPMENT: 0 Min - 0 Max			
PORTABLE TOTE TANK	BOX/CARTON/CASE				
CUBIC YARD BOX	<input checked="" type="checkbox"/> DRUM				
OTHER:	DRUM SIZE: 55				

J. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE

[Signature] **Ariel Bolero** **Body Shop Director** **01 MAR 2018**

SAFETY-KLEEN SYSTEMS
TRAINING ATTENDANCE /CERTIFICATION SHEET



Date: 03/20/2018

Training Location: Safety-Kleen Tampa, Florida

Course Name: Empty Container Review

Peoplesoft Event/Class Number: N/A

Course Code: M820-014

Time: 4:00 PM

Duration:

	PRINTED NAME	SIGNATURE	EMPLOYEE #	FACILITY (CITY, STATE)
1.	CHRIS ABEL		050001	Tampa, FL
2.	Tared Martin		092425	Bm
3.	Mathew Kozel		83107	TSM
4.	Gerald Suarez		053758	TSM
5.	Jose Luis Davis		050871	"
6.	Will Sutornus		082213	"
7.	Lincoln Mabey		052360	Tampa
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				

I certify that the above listed employees have satisfactorily passed associated tests and, demonstrated satisfactory performance and comprehension of this training.

Trainer: Jeff Curtis
(Please Print Name)

Trainer's Signature:

Trainer's Location:

Boynton Beach, Florida

Trainer: _____
(Please Print Name)

Trainer's Signature:

Trainer's Location:

RCRA EMPTY CONTAINER CHECKLIST

INSTRUCTIONS

THE SK REPRESENTATIVE CAN UTILIZE THIS CHECKLIST AS A GUIDE FOR EACH RCRA EMPTY CONTAINER PICKUP. CONTAINERS DO NOT QUALIFY FOR THIS PROGRAM IF ANY RESPONSE IS "NO".

CUSTOMER NAME: _____

CUSTOMER NUMBER: _____

MANUAL OR SERVICE DOCUMENT # _____

- ARE YOU SURE THE CONTAINERS ARE RCRA EMPTY? YES NO

(All wastes have been removed that can be removed (e.g., pouring, pumping, and aspirating), **and** No more than one inch (2.5 centimeters) of residue remain in the container or inner liner, **or** no more than 3% by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size, **or** no more than 0.3% by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size)

- ARE THE CONTAINERS IN GOOD CONDITION? YES NO
- ARE THE BUNGS, LIDS AND RINGS IN PLACE & TIGHT? YES NO
- ARE THE CAPS IN PLACE ON THE IBCs/PORTABLE TOTE PIPING? YES NO
- ARE THE CONTAINERS PROPERLY LABELED: YES NO
 - GENERATOR LABEL (PART #2456)
 - EMPTY CONTAINER LABEL
 - USDOT DIAMOND LABEL (IF NECESSARY)
 - PLACARD WITH ID# FOR BULK CONTAINERS

SK REPRESENTATIVE SIGNATURE: _____

DATE: _____

OIL SERVICES / WASTE TRACKING

156633

DOCUMENT NO.

1678674

SAFETY-KLEEN SYSTEMS INC
5309 24TH AVE SOUTH

TAMPA

FL 33619

PHONE
NUMBER

813-626-1203

US EPA ID NO.

FLD980847271

STATE EPA ID NO.

TSM

CUSTOMER NUMBER

MANIFEST NUMBER

TAM

TRANSPORTER COMPANY NAME	ADDRESS	US EPA ID NUMBER
1 SAFETY-KLEEN SYSTEMS INC	2600 N CENTRAL EXPY RICHARDSON TX 75080	TXR000081205
2 TAMPA TRANSFLOW TERMINAL	504B N 34TH ST TAMPA FL 33605-6200	0FLR000105338
3		

HANDLER	SAFETY KLEEN SYSTEMS INCORPORATED 601 RILEY ROAD EAST CHICAGO	EAS IN 46312-1628	US EPA ID NUMBER IND077042034
			STATE EPA ID NUMBER
			PHONE NUMBER 219-391-6100

IM	US DOT DESCRIPTION	24 HR EMERGENCY # 800-468-1760 (SAFETY-KLEEN,TFI)	CONTAINER		TOTAL QUANTITY	UNIT WT/VOL	SK DOT NUMBER
			NO.	TYPE			
	USED OIL (NOT USDOT HAZARDOUS MATERIAL)		1	TT	2,448	G	0000850

SKSX 101171

OIL SERVICES CERTIFICATION NO. 1

CERTIFICATE OF USED OIL/ANTIFREEZE CLASSIFICATION
FOR SHIPMENT FROM A BRANCH TO A PROCESSING FACILITY

I certify that to the best of my knowledge, the used oil contained in this shipment does not contain regulated hazardous waste as defined in 40 CFR 261, and does not require the use of a hazardous waste manifest except where required by state law. The oil has been collected and tested in compliance with 40 CFR 279 and applicable state laws using either:

- 1) Analytical data regarding the generator's used oil stream, or
- 2) Knowledge of the generator's process.

In addition, the collection drivers obtained certification from every generator that regulated quantities of 40 CFR 261 hazardous waste have not been mixed with the used oil. Documentation supporting the above statements may be found in the files of the shipping facility identified above.

SHIPPER'S INITIALS

OIL SERVICES CERTIFICATION NO. 2

CERTIFICATE OF USED OIL/ANTIFREEZE CLASSIFICATION
FOR SHIPMENT FROM AN INTERMEDIATE STORAGE FACILITY
TO A PROCESSING FACILITY

I certify that all used oil contained in this shipment has been received at this site accompanied by a Certificate of Used Oil Classification from the collection branch/depot. That certificate ensures that all material was collected in compliance with 40 CFR 279 and has not been mixed with regulated quantities of hazardous waste.

SHIPPER'S INITIALS

SK SHIP # 223903033

TAM

24 HR EMERGENCY #1-800-468-1760 (SK / TFI)

AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY

TERMODAL
RTIFICATIONGROSS
CARGO
WEIGHT

CONTENTS PLUS PACKAGING

DOT/PRFL A. 850/150105 B. C. D.

SHIPPER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, labeled, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

SHIPPER NAME	SK	SIGNATURE X	SHIPMENT DATE	MONTH 2	DAY 1	YEAR 18	TRUCK/ RAIL CAR ID NO 7 505037
TRANSPORTER NAME 1	SK	SIGNATURE X	DATE MONTH	2	1	18	
TRANSPORTER NAME 2	Transflow	SIGNATURE X	DAY	2	1	18	
TRANSPORTER NAME 3		SIGNATURE X	YEAR				
ENDING DUTY		SIGNATURE X	MONTH				

SHIPPER

Jan Barnes
904-923-6044

Address: SAME

SC PPW 10/10/2017

WORK ORDER NO. 1800550149

DOCUMENT NO. 743432

STRAIGHT BILL OF LADING

TRANSPORTER 1 Safety-Kleen Systems, Inc. VEHICLE ID # _____
EPA ID # TXR000081205 TRANS. 1 PHONE (972) 265-2000
TRANSPORTER 2 CSX Transflo Tampa VEHICLE ID # UTLX202118
EPA ID # FLR000105338 TRANS. 2 PHONE (813) 247-7675

DESIGNATED FACILITY Safety-Kleen Systems, Inc.			SHIPPER Safety-Kleen Systems, Inc.			
FACILITY EPA ID # IND077042034			SHIPPER EPA ID # FLD980847271			
ADDRESS 601 Riley Road			ADDRESS 5309 24th Avenue South			
CITY East Chicago		STATE IN	ZIP 46312	CITY Tampa	STATE FL	ZIP 33619
CONTAINERS NO. & SIZE	TYPE	HM	DESCRIPTION OF MATERIALS		TOTAL QUANTITY	UNIT WT/VOL
	TC		AUSED OIL NON DOT REGULATED MATERIAL (USED OIL)		25819	G
		B.				
		C.				
		D.				
		E.				
		F.				
		G.				
		H.				
SPECIAL HANDLING INSTRUCTIONS EMERGENCY PHONE #: (800) 463-5716						GENERATOR: Safety-Kleen Systems, Inc.
A.SK-A31NONEB						

SHIPPERS CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SHIPPER	PRINT SAFETY-KLEEN SYSTEMS	SIGN <i>Chad</i>	DATE 1/31/18
TRANSPORTER 1	PRINT SAFETY-KLEEN SYSTEMS	SIGN <i>Chad</i>	DATE 1/31/18
TRANSPORTER 2	PRINT TAMPA TRANSFLO	SIGN <i>Chad</i> FOR CSX	DATE 1/31/18
RECEIVED BY	PRINT	SIGN	DATE

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