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WEST PALM BEACH

November 20, 1991

Mr. Jeffrey Smith
Hazardous Waste Section
Florida Department of Environmental
Regulation - Southeast District
1900 S. Congress Ave., Suite A
West Palm Beach, FL 33406

*Vic
8/13/682-8094*

FLD 984167791

RE: 11/5/91 RCRA Inspection at
Boynton Beach Facility

Dear Mr. Smith:

Pursuant to the advice given on the exit interview summary, Safety Kleen must immediately begin correcting the deficiencies pointed out during the exit interview. Although there were no deficiencies noted, additional information was requested to be submitted within 15 days of the inspection date, making November 20 the latest submission date. This letter is to provide the information you requested during your visit.

"Please submit determination on unlabelled drum (floor coating waste) in rear of facility and how materials are to be handled."

The unlabelled drum contained used rollers that are laden with the floor coating SEMSTONE. Contractors resurfaced the warehouse floor the weekend of October 12 and 13. The material in the drum is very dry, solid, and the dried coating has agglomerated on the paint rollers.

Enclosed as Exhibit A are MSDS's of the floor coating that was applied. Also enclosed are TCLP test results and other laboratory analyses done on the material. The data shows that the waste is not RCRA regulated. We therefore intend to dispose of this waste into our municipal dumpster.

"Explain deficiencies in manifest dated 9/10/91 (voided manifest) and..."

The manifest had to be voided and replaced with new ones as soon as the receiving facility telephoned the branch because of a few reasons which I have listed below.

- a. Page 2, Item 10 had the EPA ID # for the Orange Park branch. The correct EPA ID # must be used.
- b. The voided manifest #91091 showed 121 drums shipped from Safety Kleen Boynton Beach as the generator. The corrected manifest #91091 shows only 58 drums shipped from the Boynton Beach branch to the Tampa AC.

Manifests for the balance of 63 drums had to show the customer, not Safety Kleen as the generator, so these should not be listed on manifest #91091. These need to show the customer as the generator because according to the manifests, the designated facility is the Tampa Accumulation Center (AC), not the Boynton Beach branch. The branch cannot sign as designated facility pursuant to 40 CFR 263.21. The manifests from these customers did not list Boynton Beach as an alternate facility.

Rather than truck these 63 drums from each customer to the Tampa AC, the wastes are accumulated at the Boynton Beach facility and then trucked to the Tampa AC when enough of a truckload has accumulated at the branch.

The manifest was voided and corrected as soon as the receiving facility (Tampa Accumulation Center) telephoned the discrepancies. Copies of the corrected manifests were in the files during your visit. Enclosed for your review is Exhibit B which includes copies of the following:

- i. Voided manifest #91091 (shows 121 drums)
- ii. Corrected manifest #91091 (shows 58 drums)
- iii. Manifests for the remaining balance (63 drums).
We have to inform you now that 5 of the remaining manifests show Boynton Beach as the designated facility, so technically these four should have been included with the corrected manifest #91091.

To correct the latter discrepancy, these 5 manifests (#'s 06073, 90777, 90798, and 29972) have been corrected to show the Tampa AC as the designated facility because these manifests were terminated at the Tampa AC. The corrected

manifests are enclosed as Exhibit C.

"Explain deficiencies ... and why manifest was not used with Bethesda Memorial Hospital"

The 5 gallons of paint waste was picked up by a Safety Kleen rep on September 19, 1991. Discussions between Tom Sands, Safety Kleen Branch Manager and Michael Redig of BWPR indicate Bethesda Memorial Hospital applied for an EPA ID # last September 30 and was issued one last November 5.

The hospital's representative certified on Safety Kleen invoice at the time that they are CESQG. A manifest was therefore not used because as a CESQG, they may not need to manifest pursuant to 40 CFR 261.5. The rep felt he has done his best to obtain the hospital's most current generator status.

The hospital did not have an EPA ID number at the time the waste was picked up because the hospital has not yet even applied for a number. It is our understanding that the hospital had not been aware of their 100 to 1000 kg/mo status and had not been attempting to apply for an EPA ID # until they were informed of such during an FDER inspection.

Branch reps have been reminded that as far as obtaining generator status that they are to communicate with an authorized representative who looks after compliance with environmental laws for the company. The rep had been communicating with the Asst. Director of Engineering at the time the waste in question was picked up. The hospital agrees that he is one of the authorized representatives on environmental matters.

"Explain how off-spec perc is generated and managed."

This type of perc is generated when a sample from a truck delivery is taken and put in a drum to verify visibly that the product is clear and clean. Some perc is also generated after a route truck is filled and the loading hose contains perc. The contents in the hose are poured into the same drum. According to the branch manager, approximately 20 to 25 gallons a week of this type of perc is generated, stored, and sent back to our recycling center in Lexington, SC.

At the present time, this perc is being stored as a product and being shipped back to Lexington as a product.

"Explain generation, management, and final disposition of FRS waste. Is there any QC associated with management of FRS wastes?"

As discussed between your Hazardous Waste Section staff and Tom Sands, Tom and his staff plan to conduct an FRS presentation with you and any interested FDER staff regarding management of FRS waste from the customer to our recycling center. QC issues involving FRS will also be discussed. I apologize for not being able to attend the presentation on Nov. 20 but I already made a prior appointment. I will be in Elgin at the time if you have any questions. I can be reached at (708)697-8460, ext. 2552.

I hope this letter is of assistance. If you have any questions, please let me know.

Sincerely,



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

CC: Catherine McCord, EHS/Eastern Division
Robert Kukleski, FDER
Javier Garcia, USEPA IV
Satish Kastury, BWPR