TRANSFLO®
OUR EXPERTISE, YOUR ADVANTAGE

August 2, 2018

VIA ELECTRONIC MAIL AND FIRST-CLASS MAIL

Mr. Daniel G. Lopez
Environmental Specialist I
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, Florida 33406

RE: TRANSFLO Terminal Services, Inc. -- Ft. Lauderdale Facility
890 SW 21st Avenue, Ft. Lauderdale, Florida

Dear Mr. Lopez:

As you are aware, TRANSFLO Terminal Services, Inc ("TRANSFLO") is in receipt of the inspection report regarding the inspection that you conducted on behalf of the Florida Department of Environmental Protection ("FDEP") earlier this year at TRANSFLO's facility located at 890 SW 21st Avenue in Ft. Lauderdale, Florida (referred to hereinafter as the "Ft. Lauderdale Facility"). Gary Smith, the Terminal Manager for the Ft. Lauderdale Facility, received a copy of the inspection report from you on June 28, 2018. Over the past few weeks, you and I have exchanged a series of e-mails concerning issues that you raised in connection with the inspection of the Ft. Lauderdale Facility, and I have provided you with responses and documentation regarding the majority of those issues. The purpose of this submission is to address the two remaining outstanding items that you have raised. In addition, for completeness purposes, I am resubmitting the documentation and responses that I previously sent to you via e-mail regarding the other items that you raised so that all of the information is included together in this one document for ease of review.

To facilitate your review of this submission, I am including excerpts from the portion of the inspection report titled "New Potential Violations and Areas of Concern" and your subsequent e-mails in bold below organized by topic and followed by TRANSFLO's responses in italics.

Topic: Not closing the dome lid on a partially filled used oil tanker railcar and not having a used oil label on the railcar (Inspection Report, p.9).

The used oil railcar that you observed during the inspection was set up waiting for the next scheduled load of used oil to be transloaded from arriving trucks into the railcar. The Ft. Lauderdale Facility will no longer leave the dome lid open temporarily on a railcar while waiting for the next truck to arrive to transload used oil into the railcar. It should be noted that all railcars are secured and ready for movement by rail at the end

of each day. The dome lids on railcars are opened to facilitate the transfer of used oil into the railcars on an as needed basis during operating hours. In addition, a used oil label was added to the railcar that you observed during the inspection that was missing the label. Pictures of a secured used oil railcar and a properly labeled used oil railcar were submitted to you via e-mail dated July 26, 2018, and are provided below.

Topic: Secondary containment structures under railcars (Inspection Report, p. 10)

As confirmed in your e-mail of June 28, 2018, FDEP has concluded that the secondary containment mechanisms being used at the Ft. Lauderdale Facility are adequate.

Topic: Potential need for the Ft. Lauderdale Facility to maintain a written Spill Prevention, Control and Countermeasures (SPCC) plan due to used oil transloading activities (Inspection Report, p. 11).

As described in the inspection report and an e-mail that you sent to the Terminal Manager for the Ft. Lauderdale Facility on June 28, 2018, FDEP appears to be taking the position an SPCC plan is required by virtue of the fact that used oil is transloaded at the Ft. Lauderdale Facility and such activities are therefore subject to the requirements of 40 C.F.R. § 279.45 which in turn cross-references the requirements of 40 C.F.R. Part 112 (relating to SPCC plans). We respectfully disagree with FDEP's interpretation of the applicable regulations and submit that the used oil transloading activities in question fall squarely within the transportation exclusion to the SPCC regulations.

By way of background, TRANSFLO is a wholly-owned subsidiary of CSX Corporation and an affiliate of CSX Transportation, Inc. ("CSXT"). Working in conjunction with CSXT, TRANSFLO provides services to its customers by making available facilities where commodities and materials can be safely transloaded directly from rail cars to trucks and from trucks to rail cars to facilitate the transportation of such commodities and materials from the point of origin to the point of destination. TRANSFLO's facilities handle almost exclusively commodities and materials that are in liquid form and are therefore transloaded from rail tank cars to tank trucks and vice versa for the purpose of continuing the movement of such commodities and materials in commerce. The commodities and materials are owned by third parties and pass through TRANSFLO's facilities in route to their ultimate destinations. TRANSFLO's facilities serve as neither original shipping locations nor ultimate shipping destinations. Rather, they are intermodal transloading facilities used to transfer commodities and materials from one mode of transportation to another in the normal course of transportation.

Rail service for carrying commodities and materials to and from TRANSFLO's facilities is primarily provided by CSXT. However, rail cars may originate at or move to points anywhere in North America. Moreover,

rail cars may be moved by multiple railroads as part of the transportation process. Trucking services are provided by independent third parties and are arranged for by those shipping or receiving the commodities and materials.

The activities on which FDEP has focused involve shipments of used oil owned by Heritage-Crystal Clean, LLC ("HCC"). HCC provides services to its customers by collecting used oil from locations where the used oil is generated. The used oil is transported by or on behalf of HCC in trucks to the Ft. Lauderdale Facility where the used oil is transferred directly from the trucks to rail cars. At no time is the used oil temporarily stored in stationary tanks or containers at the Ft. Lauderdale Facility. Once the used oil has been transloaded onto rail cars (which are typically owned by HCC), the used oil continues in transportation via rail to one of HCC's facilities where the used oil is re-refined.

The regulatory provision on which FDEP bases its assertion that TRANSFLO is required to have an SPCC plan for its transloading operations at the Ft. Lauderdale Facility is part of the federal used oil regulations codified at 40 C.F.R. Part 279.[1] That provision states in its introductory paragraph as follows: "Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR part 112)." 40 C.F.R. § 279.45 (emphasis added). The provision at issue simply cross-references the requirements of the SPCC regulations as "applicable." It does not independently impose any obligations beyond the requirements otherwise found in the SPCC regulations nor does it change the scope of the SPCC regulations. In this case, the provisions of the SPCC regulations are not applicable to TRANSFLO's activities.

Since the SPCC regulations were first adopted in 1973, EPA has recognized the important distinction between oil that is stored or handled at non-transportation-related facilities and oil that is handled at transportation-related facilities. The focus of the SPCC regulations is on non-transportation-related onshore and offshore facilities rather than transportation-related facilities. Indeed, the SPCC regulations state at the outset that "[t]his part establishes procedures, methods, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States . . . ." 40 C.F.R. § 112.1(a)(1).

By contrast, the SPCC regulations do not apply to the following:

> *Any equipment, or operation of a vessel or transportation-related onshore or offshore facility which is subject to the authority and control of the U.S. Department of Transportation, as defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of EPA, dated November 24, 1971 . . . ; [and]*
>
> *Any equipment, or operation of a vessel or onshore or offshore facility which is subject to the authority and control of the U.S. Department of Transportation or the U.S. Department of the Interior, as defined in the Memorandum of Understanding between the Secretary of Transportation, the Secretary of the Interior, and the Administrator of EPA, dated November 8, 1993 . . . .*

40 C.F.R. §§ 112.1(d)(1)(ii) and (iii). Stated simply, the SPCC rule does not apply to the owner or operator of any facility, equipment, or operation that is subject to the jurisdiction of United States Department of

[1] *Florida has largely incorporated by reference the federal used oil regulations, including 40 C.F.R. § 279.45 (which is the specific regulatory provision that FDEP has cited as the basis for its position). See F.A.C. 62-710.210.*

Transportation ("DOT"), as defined in either the 1971 Memorandum of Understanding ("MOU") between DOT and EPA,[2] or the 1994 MOU among DOT, the United States Department of the Interior and EPA.[3]

The 1971 MOU between EPA and DOT amplifies on the scope of the SPCC regulations and the line of demarcation between transportation-related and non-transportation related facilities. Section I(5) of the MOU confirms that in distinguishing between these two types of facilities, a systems approach was utilized, generally assigning to either EPA or DOT responsibility for regulating a complete operation at any one facility. Section I(5) of the 1971 MOU also provides that "[DOT] will generally be responsible for regulating the transferring of oil to or from a vessel at any facility including terminal facilities; the transporting of oil via highway, pipeline, railroad, or vessel; and certain storing operations." The definition of "transportation-related onshore and offshore facilities" in the MOU explicitly encompasses, in relevant part, "[h]ighway vehicles and railroad cars which are used for the transport of oil in interstate and intrastate commerce and the equipment and appurtenances related thereto, and equipment used for the fueling of locomotive units, as well as the rights-of-way on which they operate." MOU, Section II(2)(D).[4]

Since EPA and DOT entered into the 1971 MOU summarized above, EPA has described the scope of the SPCC regulations in the context of transportation-related activities in various contexts. EPA has continued to validate the limitations on its jurisdiction articulated in the 1971 MOU. For example, in a letter from David Lopez, Director of the Oil Program Center for EPA, to Chris Early of Safety-Kleen Corporation ("Safety-Kleen") dated July 14, 2000,[5] EPA examined the question of whether a rail car passing through a Safety-Kleen facility would be subject to SPCC requirements. In response, EPA stated as follows:

> *As a general rule, we will presume that the rail car is considered to be a "transportation-related facility" under the 1971 Memorandum of Understanding (MOU) between DOT and the U.S. Environmental Protection Agency (EPA) if it is consigned to your property or is consigned elsewhere and is being stored incidental to transportation in commerce. Storage incidental to transportation in commerce is storage between the time the oil is offered for transportation to a carrier until the time it reaches its destination and is accepted by the consignees, assuming no circumstances marking an end to the transportation process.*

In 2002, EPA promulgated extensive amendments to the SPCC regulations. See 67 Fed. Reg. 47042 (July 17, 2002). In the preamble to those regulatory amendments, EPA discussed the jurisdictional dividing line between EPA and DOT as set forth in the 1971 MOU and reaffirmed its position that the SPCC regulations only apply to those activities and facilities that fall under its jurisdiction and not DOT's jurisdiction as described in the 1971 MOU. 67 Fed. Reg. at 47062-47063. EPA took the same position in a detailed guidance document entitled "SPCC Guidance for Regional Inspectors," (EPA 550-B-13-002), originally issued in 2005 and revised in August, November and December 2013.

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[2] *The definitions from the 1971 MOU have been incorporated into 40 C.F.R. Part 112, Appendix A.*

[3] *The 1994 MOU has been incorporated into 40 C.F.R. Part 112, Appendix B. It should be noted that this MOU was signed by the Secretary of the Interior on November 8, 1993, but not signed by the Administrator of EPA until February 3, 1994. The MOU is therefore generally referred to as the 1994 MOU.*

[4] *The 1994 MOU among the United States Department of the Interior, DOT and EPA is not directly applicable to this matter in that it addresses the division of jurisdictional responsibility for offshore facilities. The Ft. Lauderdale Facility does not qualify as an offshore facility.*

[5] *See Exhibit H to EPA's SPCC Guidance for Regional Inspectors (2013).*

Not only has EPA discussed the limits of its jurisdiction in the context of the SPCC regulations, DOT has independently discussed the scope of its jurisdiction in the context of the transportation of hazardous materials. The federal hazardous materials program is codified at 49 C.F.R. Parts 171-180 and broadly regulates the transportation of hazardous materials pursuant to the federal hazardous materials transportation law, 49 U.S.C. §§ 5101-5128. As such, the scope of the federal hazardous materials program is relevant to evaluating the limits of DOT's jurisdiction over transportation activities.

Transportation is defined under the hazardous materials transportation law as "the movement of property and loading, unloading, or storage incidental to the movement." 49 U.S.C. § 5102(13). In 2003, the Research and Special Programs Administration ("RSPA") within DOT issued regulations under Docket No. RSPA-98-4952 (HM-223) to clarify the applicability of the federal hazardous materials program to certain functions and activities associated with the handling of hazardous materials. See 68 Fed. Reg. 61906 (Oct. 30, 2003). Thereafter, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") within DOT (as the successor to RSPA) issued further regulations clarifying the reach of the federal hazardous materials program with respect to loading, unloading and storage activities associated with the transportation of hazardous materials. See 70 Fed. Reg. 20018 (April 15, 2005). In that rule-making, PHMSA confirmed that the transportation functions over which DOT has jurisdiction include loading, unloading, and storage activities incidental to movement. PHMSA also clarified that transloading[6] is a transportation function (irrespective of the location at which the operation occurs). 40 C.F.R. § 171.8; 70 Fed. Reg. at 20020-21.

In the preamble to the 2005 amendments to the hazardous material regulations, PHMSA explained that transportation in commerce subject to DOT's jurisdiction "begins when a carrier takes physical possession of a hazardous material for the purpose of transporting it and continues until delivery of the package to its consignee or destination as evidenced by the shipping documentation under which the hazardous material is moving, such as shipping papers, bills of lading, freight orders, or similar documentation." 70 Fed. Reg. at 20019. This concept is reflected in 49 C.F.R. § 171.1. Recognizing that movement in commerce of commodities and materials may involve multiple modes of transportation, PHMSA clarified that transloading of commodities and materials is a transportation function and thereby falls under the jurisdiction of DOT. 70 Fed. Reg. at 20020-21. Moreover, PHMSA clarified that storage incidental to movement is also part of transportation and includes storage of hazardous materials at transloading facilities. 70 Fed. Reg. at 20020.

In summary, the SPCC regulations expressly do not apply to transportation-related facilities that are subject to DOT's jurisdiction. The 1971 MOU between EPA and DOT explicitly states that transportation facilities encompass highway vehicles and railroad cars that are used to transport oil in interstate and intrastate commerce. EPA has confirmed that the jurisdictional dividing line described in the 1971 MOU continues to delineate the scope of the SPCC regulations. Along with EPA's pronouncements, DOT has clarified the type of transportation activities that fall within its jurisdiction. Transportation functions that are subject to DOT's jurisdiction (and therefore fall outside of EPA's jurisdiction for purposes of the SPCC regulations) include transloading activities and storage incidental to movement. The used oil that is transloaded at the Ft. Lauderdale Facility is simply moving from one form of transportation to another. The used oil is collected at points of generation (i.e., points of origination) and transported by truck to the Ft. Lauderdale Facility where it is directly transferred into rail cars to continue in transportation to the ultimate receiving facilities. Under such circumstances, we believe that the rail cars carrying used oil are subject to the jurisdiction of DOT as are the trucks transporting used oil to be placed on the rail cars and the transloading activities

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[6] *Transloading is defined as "the transfer of a hazardous material by any person from one bulk packaging to another bulk packaging, from a bulk packaging to a non-bulk packaging, or from a non-bulk packaging to a bulk packaging for the purpose of continuing the movement of the hazardous material in commerce." 49 C.F.R. § 171.8.*

themselves. Accordingly, the transloading of used oil at the Ft. Lauderdale Facility does not trigger the requirements in the SPCC regulations to prepare an SPCC plan.

Topic: Information contained in shipping papers relating to used oil shipments that are transloaded at the Ft. Lauderdale Facility (Inspection Report, p. 11).

TRANSFLO is aggressively working with HCC to ensure that shipping paperwork is completed in the manner that FDEP has directed in the inspection report and subsequent e-mails from FDEP dated June 28, July 12 and July 25, 2018. HCC is in the process of correcting its computer-generated forms for the Bill of Ladings for used oil shipments to capture the necessary information and to address FDEP's concerns with the documentation. We anticipate receiving the corrected template in the immediate future and will begin using the corrected template for the shipping papers as soon as it is received.

Topic: Labelling of containers holding used oil filters and condition of roof on outdoor waste storage area (Inspection Report, p. 12).

During the inspection, you noted that one drum containing used oil filters had a label that did not clearly state "Used Oil Filters." The drum has been re-labeled with a label clearly stating "Used Oil Filters." You also raised concerns regarding the condition of the roof over the outdoor waste storage area. The waste storage drum lids were painted and tarped to prevent water affecting the drums if the roof leaks again until it is resealed or repaired. Permanent repairs to the roof are underway as indicated in my e-mail to you on July 26, 2018. Below are copies of the pictures previously submitted with my e-mail to you of July 9, 2018.

Re-labeled Drum

Painted drum lids

Tarped waste drums

Topic: Aerosol can management (e-mail from FDEP to the Ft. Lauderdale Terminal Manager, Gary Smith, dated June 28, 2018).

The few aerosol cans used at the Ft. Lauderdale Terminal will be recycled using a company called Newstripe as indicated in my e-mail to you of July 26, 2018. A copy of the invoice for the recycling container and information on the company and process was also included with that e-mail. A certificate of recycling will be provided once the package is received and processed. Copies of the invoice and recycling process information are attached below.

Topic: Suggested Best Management Practice (Inspection Report, p. 16)

In the inspection report that you sent to TRANSFLO on June 28, 2018, you recommended as a "best management practice" that we update the hazardous waste generator notification form for spent arts

washer solvent generated at the Ft. Lauderdale Facility. On July 26, 2018, I submitted to your attention via e-mail pictures and documentation regarding the reclassification of the spent parts washer solvent from hazardous to non-hazardous waste based on the analytical data that we have obtained, the safety data sheet ("SDS") for non-hazardous solvent used in the Safety Kleen-supplied parts washer, and our process of not utilizing any other solvent in the parts washer other than the supplied non-hazardous solvent from Safety Kleen. A copy of the non-hazardous certification form that I signed and submitted to Safety Kleen was also included in my e-mail and a copy is attached below. Therefore, the spent parts washer solvent is now classified as non-hazardous waste and will be managed accordingly by Safety Kleen on behalf of TRANSFLO.

* * * * *

Please contact me at (904) 359-1323, or via email at jbarnes@transflo.net, if you should have any questions regarding either the information or analysis presented in this letter or TRANSFLO's operations at the Ft. Lauderdale Facility. If you believe that it would be beneficial, we would be quite willing to meet with you at a mutually convenient time and place to discuss the issues that you have raised.

Sincerely,

Jan M. Barnes
Director – HSE and Quality

Attachments

- *Aerosol Can Recycling Information*
- *Newstripe Aerosol Can Recycling Receipt*
- *Parts Washer Analytical Report*
- *Parts Washer SDS*
- *Parts Washer Sample Document*

Aerosol Can Recycling Box

newstripe.com/product/aerosol-can-recycling-box/

$67.95 – $187.95

The Aerosol Can Recycling Box is the simple convenient way to dispose of your undamaged aerosol cans. Simply *fill it, seal it, and ship it!* Stay compliant while saving time and reducing your administrative cost.

Not available in AK, AR, CT, HI, MA, ME, MN, NH, NY, RI, VT and PR. Not for export.

Clear

Add to Wishlist

Overview

The Aerosol Can RecyclePak™ offers a unique, all-inclusive , way to recycle your used hazardous and non-hazardous aerosol cans. Perfect for facilities that process less than a pallet of waste.

Each pack includes: RecyclePak™ Box, Liner and Tie, 12”x 12” Absorbent Pad, Return Shipment Authorization, Terms and Conditions, Instructions, Proof of Purchase, Prepaid FedEx Ground Label, and Online Certificate of Acceptance for Recycling/Disposal

The Aerosol Can RecyclePak only takes a few simple steps:

1. *Fill it!* Just follow the included instructions and pack your aerosol cans.
2. *Seal it!* Seal the liner with the provided tie and tape the box.
3. *Ship it!* Attach the prepaid FedEx shipping label and arrange for pickup.

Once received you are provided with a certificate of recycling.

Customized Options– With the RecyclePak™ you can select from four container sizes to meet your needs. This allows you to easily increase or decrease the box size based on your production levels.

Versatile – You can fill and return your box immediately or accumulate cans for up to 1 year.

No Maintenance – Regulations require that hazardous waste must be identified, stored, and disposed of properly, The RecyclePak™ reduces your administrative burden by providing everything you need to recycle your aerosol cans including certificate of recycling.

Compliant – The Aerosol Can Recycling Box is certified or working towards certifications for R2, ISO 14001, OHSAS 18001

Not available in AK, AR, CT, HI, MA, ME, MN, NH, NY, RI, VT and PR. This aerosol can recycling box is not for export.

Billing Address

Lisa Wiedemann
5235 Moore Loop
Crestview, FL 32536

Shipping Address

Gary Smith
Ft. Lauderdale TRANSFLO Terminal
890 SW 21st Avenue
Fort Lauderdale, FL 33312

Order

Order Number	6551
Order Date	July 26, 2018
Payment Method	Credit Card
Email	lwiedemann@wiedemannllc.com
Telephone	8503063490

Product	Price	Quantity	Total
Aerosol Can Recycling Box Capacity:6 aerosol cans SKU: 10004933	$67.95	1	$67.95
Subtotal			**$67.95**
Shipping			$16.99 via Expedited - 2 Day
Total			**$84.94**

Clean Harbors Analytical Services

Report ID
20180716092950

Laboratory Test Report

Monday, July 16, 2018

Client ID Parts Washer Solvent **Lab Sample ID** EC1807003 **SDG** 1807002

CSX Transflow

Branch
77BSY

Contact: Steven Fischer
Project ID: CSX Transflow
Customer: Safety Kleen
Address: 5610 Alpha Drive
Boynton Beach FL 33426
561-402-9111

All tests contained within this report were performed at the Clean Harbors Analytical Services East Corporate Laboratory located within the Baltimore Facility in Baltimore, MD. Samples are tested in "as-received" condition, and the test results relate only to the sample listed above. The laboratory certifies that the generation of all the test results contained here-in was performed meeting the quality system requirements of ISO/IEC 17025:2005(E) and is in compliance with the listed analytical method except as otherwise noted within this report.

SPECIAL NOTE:
Page numbers and total number of pages are listed on the bottom of each page. Because each page contains information to the sample, in-which any part may be significantly relevant to the other parts of the report; this report shall not be reproduced, except in full, without the written approval of the laboratory's management. Reproduction of this report of any kind, except in full, shall invalidate this report's laboratory approval and all data contained therein.

DATA QUALIFIERS
Data qualifiers may be utilized when reporting test results as an aid to understanding laboratory method limitations. Data qualifications may be in the form of either a report narrative or flagged test results. Data qualifier flag definition are located on the last page of the report. EPA Holding Time and Preservation recommendation excursions will be narrated within the individual test group or on page 2 of this report.

Questions regarding this report may be made by contacting the Laboratory Director or your project manager.
Please send your positive or negative comments to the Laboratory Quality Manager at
[waite.robert@cleanharbors.com].

Bill Fornoff
Approving Authority
Bill Fornoff
16-Jul-18

Clean Harbors Analytical Services **Report ID**

Laboratory Test Report

Monday, July 16, 2018

Client ID Parts Washer Solvent **Lab Sample ID** EC1807003 **SDG** 1807002

Sample Receipt

Logged In: 7/9/2018 **# Bottles** 1

Sample Container Condition:	Good	**Shipping Container Condition**	Good
	Y	**Proper Sample Container**	
	Y	**Sample Label Present**	
	Y	**Sample Label Complete and Matches COC**	
Sample On Ice:	N		
Temp:	25.4	deg C **Thermometer ID:** 003-2-18	
	N	**Sample Chemically Preserved**	
		(documentation review, physical check performed during sample prep is required)	
Chain-of-Custody Record Present:	Y		
	Y	**COC Complete**	
	N	**Custody Seals Present (on sample or on shipping container)**	
	NA	**Custody Seals Intact**	
Within Holding Time:	Y	**Sufficient Sample Volume:**	Y

ANALYSIS ROUTED

N	**Reactivity 40CFR261**	N	**Flashpoint 40CFR261**
N	**pH 40CFR261**	N	**pH (non-aqueous)**
Y	**TCLP Metals 40CFR261**	Y	**TCLP Mercury 40CFR261**
N	**TCLP Pesticides 40CFR261 (*)**	N	**TCLP Herbicides 40CFR261 (*)**
N	**TCLP Semivolatiles 40CFR161**	N	**TCLP Volatiles 40CFR261**

(*) outsourced

SAMPLE RECEIPT COMMENTS

Clean Harbors Analytical Services

Report ID
20180716092950

Laboratory Test Report

Monday, July 16, 2018

(All results are reported on a wet-weight basis unless otherwise noted.)

Client ID Parts Washer Solvent **Lab ID** EC1807003 **SDG** 1807002

Test: TCLP ICP-MS Metals **Test Method:** EPA-6020B **TCLP Method:** EPA-1311

Parameter	CAS	Qual	Result	Units	RL	LOQ	Waste Code	*Reg Limit	*Reg Units
Arsenic (As)	7440-38-2	<	0.20	mg/L	0.20	0.20	D004	5.0	mg/L
Barium (Ba)	7440-39-3	<	0.20	mg/L	0.20	0.20	D005	100.0	mg/L
Cadmium (Cd)	7440-43-9	<	0.20	mg/L	0.20	0.20	D006	1.0	mg/L
Chromium (Cr)	7440-47-3		0.65	mg/L	0.20	0.20	D007	5.0	mg/L
Lead (Pb)	7439-92-1	<	0.20	mg/L	0.20	0.20	D008	5.0	mg/L
Mercury (Hg)	7439-97-6	<	0.20	mg/L	0.20	0.20	D009	0.2	mg/L
Selenium (Se)	7782-49-2	<	0.20	mg/L	0.20	0.20	D010	1.0	mg/L
Silver (Ag)	7440-22-4	<	0.20	mg/L	0.20	0.20	D011	5.0	mg/L

Comments:

Arsenic (As)	EPA-6020B
Barium (Ba)	EPA-6020B
Cadmium (Cd)	EPA-6020B
Chromium (Cr)	EPA-6020B
Lead (Pb)	EPA-6020B
Mercury (Hg)	EPA-6020B
Selenium (Se)	EPA-6020B
Silver (Ag)	EPA-6020B

(*) 40 CFR 261.24

Laboratory Test Report

Monday, July 16, 2018

Client ID Parts Washer Solvent **Lab ID** EC1807003 **SDG** 1807002

REPORTING LIMITS AND ACRONYMS

RL Reporting Limit - The lowest level that the laboratory reports down to for that specific test parameter/method combination. The RL is set to be at or above the detection limit determined in a clean control matrix and is adjusted for dilutions. The RL will match the associated LOQ if the detection limit is not routinely verified. Under NELAP, routine detection limit studies are only required when reporting a value below LOQ. Values reported between the LOQ and the RL are always considered estimated. RL is not applicable to some tests.

LOQ Limit of Quantitation - The lowest verified point that a value can be reported that is within a known level of confidence, adjusted for sample dilution. LOQ is not applicable for some tests.

Reg Limit and Reg Units Regulatory Limit and Regulatory Units - Provided as a curtesy and must be verified as correct for the data's intended purpose by the data's user. The regulatory citation is provided. WARNING: regulatory limits for a parameter different from regulatory citation to regulatory citation. For example, 40 CRF 261 regulatory limits are not equivalent to 40 CFR 268 regulatory limits of the same parameter.

SURROGATE LIMIT GENERATION

It is important to note that when Surrogates are used as part of the test method, statistical control limits (when employed) are derived from LCS results in an appropriate QC matrix (typically sand for solid matrix samples, reagent water for aqueous matrix samples or TCLP Solution for TCLP extracts, and mineral oil for non-aqueous liquid concentrated waste samples. These limits therefore are representative of the process by which RL/LOQ are established and verified. This allows the user to assess matrix effects related to surrogate recover against a known laboratory control.

REPORTING FLAGS

B Denotes a sample test result analyte that is above the RL was also found in the associated laboratory blank at a concentration above the RL.

e Denotes that a positive numeric value is an estimated value. Used when the reported value is greater than the highest calibration point in the curve or above the verified upper linear dynamic range.

< Analyte was not detected at the RL.

j Denotes that a positive numeric value is an estimated value. Used when the reported value is less than the Lower Limit of Quantitation but at or above the Limit of Detection.

UJ RL and LOQ Estimated - Denotes the RL and LOQ has an increased level of potential bias. Used in non-detect values as necessary.

NR Not Run - Denotes that the listed analyte was not run.

**** END OF TEST REPORT ****

safety-kleen

Safety Data Sheet

Material Name: SAFETY-KLEEN PREMIUM SOLVENT (VIRGIN AND RECYCLED) **SDS ID: GHS 82658**

* * * Section 1 - Identification * * *

Product Identifier

SAFETY-KLEEN PREMIUM SOLVENT (VIRGIN AND RECYCLED)

Product Code

None.

Synonyms

Safety-Kleen Premium Gold Solvent; Safety-Kleen Continued Use Product Solvent (CUP); High Flash Degreasing Solvent; Parts Washer Solvent; Petroleum Distillates; Petroleum Naphtha; Naphtha, Solvent; Mineral Spirits

Recommended Use

Cleaning and degreasing metal parts. If this product is used in combination with other products, refer to the Safety Data Sheets for those products.

Restrictions on Use

None known.

Manufacturer Information

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, TX 75080
www.safety-kleen.com

Phone: 1-800-669-5740

Emergency # 1-800-468-1760

Issue Date

September 2, 2014

Supersedes Issue Date

November 8, 2012

Original Issue Date

January 26, 1995

* * * Section 2 - Hazard(s) Identification * * *

Classification in Accordance with 29 CFR 1910.1200.

Flammable Liquids, Category 4
Specific Target Organ Toxicity - Single Exposure, Category 3 (central nervous system)
Aspiration Hazard, Category 1

GHS LABEL ELEMENTS

Symbol(s)

Signal Word

DANGER!

Hazard Statement(s)

Combustible liquid
May cause drowsiness and dizziness
May be fatal if swallowed and enters airways

Precautionary Statement(s)

Prevention

Keep away from flames and hot surfaces. - No smoking. Wear protective gloves and eye/face protection. Avoid breathing vapor or mist. Use only outdoors or in a well-ventilated area.

Response

In case of fire: Use Class B/C or Class A/B/C fire extinguisher, carbon dioxide, regular foam, dry chemical, water spray, or water fog for extinction. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell. IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician. Do NOT induce vomiting.

Storage

Store in a well-ventilated place. Keep container tightly closed. Keep cool.

Disposal

Dispose of in accordance with all applicable federal, state and local regulations.

Hazard(s) Not Otherwise Classified

None known.

* * * Section 3 - Composition / Information on Ingredients * * *

CAS	Component	Percent
64742-47-8	Distillates (petroleum), hydrotreated light	100

* * * Section 4 - First Aid Measures * * *

Description of Necessary Measures

Inhalation

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/physician if you feel unwell.

Skin

IF ON SKIN: Wash with plenty of soap and water. Remove contaminated clothing and wash before reuse. Get medical attention if irritation develops or persists.

Eyes

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention if irritation develops or persists.

Ingestion

IF SWALLOWED: Aspiration hazard. Do NOT induce vomiting. If vomiting occurs, keep head lower than hips to help prevent aspiration. Call a poison control center or doctor immediately for treatment advice.

Most Important Symptoms/Effects

Acute

Central nervous system depression

Delayed

Central nervous system damage

Indication of Immediate Medical Attention and Special Treatment Needed, If Needed

IF exposed: Call a POISON CENTER or doctor/physician. Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.

* * * Section 5 - Fire-Fighting Measures * * *

Suitable Extinguishing Media

Class B/C or Class A/B/C fire extinguisher, carbon dioxide, regular foam, regular dry chemical, water spray, water fog.

Unsuitable Extinguishing Media

Do not use high-pressure water streams.

Specific Hazards Arising from the Chemical

Combustible liquid and vapor. The vapor is heavier than air. Vapors or gases may ignite at distant ignition sources and flash back. Run-off to sewer may create a fire hazard. Heated containers may rupture or be thrown into the air. Empty containers may retain product residue including flammable/explosive vapors. Product may be sensitive to static discharge, which could result in fire or explosion.

Hazardous Combustion Products

Decomposition and combustion materials may be toxic - Burning may produce carbon monoxide and unidentified organic compounds.

Special Protective Equipment and Precautions for Firefighters

A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

Fire Fighting Measures

Keep away from sources of ignition - No smoking. Keep unnecessary people away, isolate hazard area and deny entry. Move container from fire area if it can be done without risk. Cool containers with water spray until well after the fire is out. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tanks due to fire. Stay away from the ends of tanks. For tank, rail car or tank truck, evacuation radius: 800 meters (1/2 mile). Stay upwind and keep out of low areas. Dike for later disposal.

NFPA Ratings: Health: 1 **Fire:** 2 **Reactivity:** 0

Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe

* * * Section 6 - Accidental Release Measures * * *

Personal Precautions, Protective Equipment and Emergency Procedures

Wear personal protective clothing and equipment. See **Section 8 – Exposure Controls/Personal Protection**. Avoid release to the environment.

Methods and Materials for Containment and Clean Up

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **Section 8 – Exposure Controls/Personal Protection.** Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface water and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal. Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

There may be specific regulatory reporting requirements associated with spills, leaks, or releases of this product. Also see **Section 15 – Regulatory Information.**

* * * Section 7 - Handling and Storage * * *

Precautions for Safe Handling

Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. When transferring product, trucks and tank cars should be grounded and bonded. Do not breathe vapor or mist. Use in a well-ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using this product.

Conditions for Safe Storage, Including Any Incompatibilities

Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Keep container tightly closed. Keep cool. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Empty product containers may retain product residue and can be dangerous. Store in a well-ventilated place. See **Section 14 – Transportation Information** for Packing Group information.

Incompatibilities

Strong oxidizing materials.

* * * Section 8 - Exposure Controls / Personal Protection * * *

Component Exposure Limits

Distillates (petroleum), hydrotreated light (64742-47-8)

ACGIH:	100 ppm TWA (related to Stoddard solvent)
OSHA Final:	500 ppm TWA; 2900 mg/m3 TWA (related to Stoddard solvent)
OSHA Vacated:	100 ppm TWA; 525 mg/m3 TWA (related to Stoddard solvent)
NIOSH:	350 mg/m3 TWA (related to Stoddard solvent)
	1800 mg/m3 Ceiling (15 min, related to Stoddard solvent)

Appropriate Engineering Controls

Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

Individual Protective Measures, such as Personal Protective Equipment

Personal protective equipment should be selected based upon the conditions under which this material is used. A hazard assessment of the work area for PPE requirements should be conducted by a qualified professional pursuant to regulatory requirements. The following PPE should be considered the minimum required: safety glasses, gloves, lab coat or apron.

Eyes/Face Protection

Safety glasses with side shields should be worn at a minimum. Additional protection such as goggles, face shields, or respirators may be needed depending upon anticipated use and concentrations of mists or vapors. Provide an emergency eye wash fountain and quick drench shower in the immediate work area. Contact lens use is not recommended.

Skin Protection

Where skin contact is likely, wear neoprene, nitrile, or equivalent protective gloves; use of natural rubber or equivalent gloves is not recommended. To avoid prolonged or repeated contact with products where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, coveralls, long sleeve shirts, or other protective clothing.

Respiratory Protection

Use NIOSH-certified P- or R- series particulate filter and organic vapor cartridges when concentration of vapor or mist exceeds applicable exposure limits. Protection provided by air purifying respirators is limited. Do not use N-rated respirators. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134; or in Canada with CSA Standard Z94.4.

* * * Section 9 - Physical & Chemical Properties * * *

Appearance/Odor :	Liquid, clear, colorless to pale yellow Mild hydrocarbon odor	**pH:**	Not applicable
		Odor Threshold:	30 ppm (based on Stoddard Solvent)
Boiling Point:	350°F (177°C) (initial)	**Melting Point:**	-45°F (-43°C) (maximum)
Solubility (H2O):	Insoluble.	**Specific Gravity:**	0.77 to 0.82 at 60°F (15.6°C) (water = 1)
Density:	6.4 to 6.7 LB/US gal (770 to 800 g/l)	**Octanol/H2O Coeff.:**	Not available
Evaporation Rate:	<0.1 (butyl acetate = 1)	**Auto Ignition Temperature:**	480°F (249°C) (minimum)
LFL:	0.7 VOL% (minimum)	**Flash Point:**	148°F (64°C) (minimum)
UFL:	5 VOL% (maximum)	**Viscosity:**	Not available
Vapor Pressure:	0.2 mm Hg at 68°F (20°C); 0.6 mm Hg at 100°F (37°C)	**Vapor Density:**	5 (air = 1) (approximately)

Other Property Information

No information is available.

* * * Section 10 - Stability & Reactivity * * *

Reactivity

No reactivity hazard is expected.

Chemical Stability

Stable under normal temperatures and pressures.

Possibility of Hazardous Reactions

Will not polymerize under normal temperature and pressure conditions.

Conditions To Avoid

Avoid heat, sparks, flames, and other sources of ignition Avoid contact with incompatible materials.

Incompatible Materials

Avoid acids, alkalies, oxidizing agents, reducing agents, or reactive halogens.

Hazardous Decomposition Products

None under normal temperatures and pressures. See also **Section 5: Hazardous Combustion Products.**

* * * Section 11 - Toxicological Information * * *

Toxicity Data and Information

Component Analysis - LD50/LC50

Distillates (petroleum), hydrotreated light (64742-47-8)

Inhalation LC50 Rat >5.2 mg/L 4 h; Oral LD50 Rat >5000 mg/kg; Dermal LD50 Rabbit >2000 mg/kg

Information on Likely Routes of Exposure

Inhalation

May cause irritation, nausea, loss of appetite, headache, drowsiness, dizziness, disorientation, tremors, lung damage (from aspiration), convulsions, and coma.

Ingestion

May cause headache, drowsiness, dizziness, loss of coordination, and aspiration hazard.

Skin Contact

May cause irritation of the skin.

Eye Contact

No information on significant adverse effects.

Immediate Effects

Central nervous system depression, lung damage (from aspiration), respiratory tract irritation, skin irritation.

Delayed Effects

Central nervous system damage, respiratory system damage.

Irritation/Corrosivity

Respiratory tract irritation, skin irritation.

Respiratory Sensitization

No information available for the product.

Skin Sensitization

No information available for the product.

Carcinogenicity

No carcinogenicity data available for this product.

Component Carcinogenicity

None of this product's components are listed by ACGIH, IARC, OSHA, NIOSH, or NTP.

Germ Cell Mutagenicity

Based on best current information, there is no known mutagenicity associated with this product.

Teratogenicity

No information available for the product.

Reproductive Effects

No epidemiological data is available for this product.

Specific Target Organ Effects - Single Exposure

Central nervous system.

Specific Target Organ Effects - Repeated Exposure

Central nervous system.

Aspiration Hazard

Lung aspiration hazard if swallowed.

Medical Conditions Aggravated by Exposure

Individuals with pre-existing respiratory tract (nose, throat, and lungs), central nervous system, kidneys, and eye and/or skin disorders may have increased susceptibility to the effects of exposure.

* * * Section 12 - Ecological Information * * *

Ecotoxicity

According to the California Code of Regulations, a toxicity to aquatic life, specifically fish, is determined using an acute 96 hour bioassay. A material is non-hazardous if the LC_{50} is >500 mg/L. This product passed the bioassay and is considered non-hazardous.

Persistence and Degradability

This material is believed not to biodegrade.

Bioaccumulation Potential

This material is believed not to bioaccumulate.

Mobility in Soil

Expected to have high mobility in soil.

Other Adverse Effects

No additional information is available.

* * * Section 13 - Disposal Considerations * * *

Disposal Methods

Not regulated. Based on available data, this information applies to the product as supplied to the user. Processing, use, or contamination by the user may change the waste code applicable to the disposal of this product.

Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.

* * * Section 14 - Transport Information * * *

Emergency Response Guide Number

128: Reference . *North American Emergency Response Guide Book*

Transportation Regulations

DOT **Non-Bulk Packages (less than or equal to 119 gallons)**

Not regulated.

Shipping Name: Cleaning compounds (Petroleum naphtha)(Not US DOT regulated)

Bulk Packages

Shipping Name: Combustible liquid, n.o.s. (petroleum naphtha)

UN/NA #: NA1993 **Hazard Class:** Combustible liquid **Packing Group:** III

Required Placards: Class 3, NA 1993

TDG Not regulated as dangerous goods.

* * * Section 15 - Regulatory Information * * *

Volatile Organic Compounds (As Regulated)

100 WT%; 6.4 to 6.7 LB/US gal; 770 to 800 g/l

As per 40 CFR Part 51.100(s).

VOC Vapor Pressure: <1.0 mmHg @ 20°C

Product may or may not be considered photochemically reactive (100% by weight).

Consult your state or local air district regulations for location specific information.

Federal Regulations

SARA 302/304

Component Analysis

Based on the ingredient(s) listed in SECTION 3, this product does not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

SARA 311/312 Hazardous Categories

This product poses the following health hazards as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA):

Acute Health: Yes **Chronic Health:** Yes **Fire:** Yes **Pressure:** No **Reactive:** No

SARA Section 313

Component Analysis

This product does not contain any "toxic" chemical subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

CERCLA

Component Analysis

Based on the ingredient(s) listed in SECTION 3, this product does not contain any "hazardous substance" listed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4.

TSCA Inventory

All the components of this substance are listed on or are exempt from the TSCA inventory listing.

Component Analysis

Component	CAS #	TSCA
Distillates (petroleum), hydrotreated light	64742-47-8	Yes

U.S. State Regulations

This product may contain a detectable amount of benzene CAS 71-43-2, p-dichlorobenzene CAS 106-46-7, ethylbenzene CAS 100-41-4, and naphthalene CAS 91-20-3. WARNING: These chemicals are known to the State of California to cause cancer.

This product may contain a detectable amount of benzene CAS 71-43-2 and toluene CAS 108-88-3. WARNING: These chemicals are known to the State of California to cause birth defects or other reproductive harm.

Canadian Regulations

This product has been classified in accordance with the criteria of the Controlled Products Regulations (CPR) and the MSDS contains all of the information required by the CPR.

Component Analysis

Component	CAS #	CAN
Distillates (petroleum), hydrotreated light	64742-47-8	DSL

Canadian WHMIS Information

B3 D2B

* * * Section 16 - Other Information * * *

Revision Information

Reformat to OSHA HazCom 29 CFR 1910.1200 adoption of GHS Revision 3.

Key/Legend

ACGIH - American Conference of Governmental Industrial Hygienists; ADR - European Road Transport; AU - Australia; BOD - Biochemical Oxygen Demand; C - Celsius; CA - Canada; CAS - Chemical Abstracts Service; CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act; CN - China; CPR - Controlled Products Regulations; DFG - Deutsche Forschungsgemeinschaft; DOT - Department of Transportation; DSL - Domestic Substances List; EEC - European Economic Community; EINECS - European Inventory of Existing Commercial Chemical Substances; EPA - Environmental Protection Agency; EU - European Union; F - Fahrenheit; IARC - International Agency for Research on Cancer; IATA - International Air Transport Association; ICAO - International Civil Aviation Organization; IDL - Ingredient Disclosure List; IMDG - International Maritime Dangerous Goods; JP - Japan; Kow - Octanol/water partition coefficient; KR - Korea; LEL - Lower Explosive Limit; LOLI - List Of LIsts™ - ChemADVISOR's Regulatory Database; MAK - Maximum Concentration Value in the Workplace; MEL - Maximum Exposure Limits; NFPA - National Fire Protection Agency; NIOSH - National Institute for Occupational Safety and Health; NJTSR - New Jersey Trade Secret Registry; NTP - National Toxicology Program; NZ - New Zealand; OSHA - Occupational Safety and Health Administration; PH - Philippines; RCRA - Resource Conservation and Recovery Act; RID - European Rail Transport; RTECS - Registry of Toxic Effects of Chemical Substances®; SARA - Superfund Amendments and Reauthorization Act; STEL - Short-term Exposure Limit; TDG - Transportation of Dangerous Goods; TSCA - Toxic Substances Control Act; TWA - Time Weighted Average; UEL - Upper Explosive Limit; US - United States

Disclaimer

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, of merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to the information or the product to which the information refers. The data contained on this sheet apply to the product as supplier to the user.

End of Sheet 82658

SAMPLE CHAIN-OF-CUSTODY RECORD

CleanHarbors

Ship Samples To: SDG1807002

Clean Harbors East Corporate Lab
1910 Russell Street
Baltimore, MD 21203
Attn: Sample Receiving
Phone: 410-244-8200

~~EC1807003~~ EC1807003 mp 7/9/18

Safety-Kleen

Client Name CSX Transflow | Sales Specialist Name Steven Fischer | Branch Name / Number BSK / 20995

Client Contact Gary Smith | Sales Specialist Phone 561-402-9111 | Branch Address

Client Email GSmith@ArrowMaterialServices.com | Email Address Steve.Fischer@Safety-Kleen.com

COLLECTION INFORMATION

CHAS Assigned SAMPLE ID #	CLIENT SAMPLE IDENTIFICATION	DATE	TIME	DESCRIPTION OF SAMPLE	NO. OF CONTAINERS & SIZE	SIGNATURE OF COLLECTOR
01	Parts washer Solvent	7/6/18	11:30	Solvent	1	Steven Fischer

ANALYSIS REQUEST (PLACE CHECKS BY TESTS REQUIRED)

_____ **Full TCLP + Characteristics (D001 - D043)** (SPN 82109, 870813, 870812, 870814, 870815)
_____ **Full TCLP (D004 - D043)** (SPN 82109)
_____ **Full TCLP Minus Pests & Herbs** (SPN 82109)
_____ **Flashpoint / Ignitabilty for D001** (SPN 870813)
_____ **pH / Corrosivity for D002** (SPN 870812)
_____ **Reactivity Screen (Cyanide/Sulfide) D003** (SPN 870814, SPN 870815)
✓ **TCLP Metals Only** (SPN 870805)
_____ **TCLP Volatiles Only** (SPN 870807)

_____ **TCLP Semivoa Only - Aqueous or Solid** (SPN 870808)
_____ **TCLP Semivoa Only - Organics** (SPN 870809)
_____ **Solvent Screen** (SPN 870813, 870806, 870807) **(Includes Flashpoint, TCLP Metals & TCLP Volatiles)**
_____ **TCLP Pesticides** (SPN 870810)
_____ **TCLP Herbicides** (SPN 870811)
_____ **PCBs (including wipes)** (SPN 870820)
_____ **BTEX** (SPN 870819)
_____ **Heat of Combustion (BTU)** (SPN 870822)
_____ **% Water by Karl Fischer** (SPN 870823)

_____ **Total Organic Carbon (TOC)** (SPN 870824)
_____ **Oil and Grease (HEM)** (SPN 870816)
_____ **Total Petroleum Hydrocarbons (TPH)** (SPN 870817)
_____ **Total Organic Halogens (TOX)** (SPN 870825)
_____ **Gasoline Range Organics (GRO)** (SPN 870828)
_____ **Diesel Range Organics (DRO)** (SPN 870829)
_____ **Biochemical Oxygen Demand (BOD)** (SPN 870826)
_____ **Chemical Oxygen Demand (COD)** (SPN 870827)
_____ **Specific Gravity/Bulk Density** (SPN 870818)
_____ **Paint Filter (to determine if liquid or solid)** (SPN 870821)

ADDITIONAL TESTING REQUESTS:

SAMPLE TRANSFER RECORD

RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME
Steven Fischer	7/6/18	12:30	Matthew M. Beeks	7/9/18	0914

LAB USE ONLY

TEMPERATURE WHEN RECEIVED 25.4 °C

SAMPLE KIT OPENED AND CHECKED IN BY MATTHEW BEEKS AT 9:14 ON 7/9/18.

Safety-Kleen.

Plano, Texas 75024 www.safety-kleen.com PLACEMENT FORM

C S 1 0 1 1 8

DUNS NO. 05-397-6551 FED. ID NO. 396090019

NAME	TITLE	SIGN
1.		
2.		

BRANCH OFFICE

GENERATOR LOCATION

NAME: CSX Transflow

DELIVERY ADDRESS: 890 SW 2nd St Ave

INFORMATION/ATTENTION LINE:

CITY & STATE: Ft. Lauderdale

ZIP: 33312 TAX CODE:

BILL TO (IF DIFFERENT FROM LOCATION)

NAME:

DELIVERY ADDRESS:

INFORMATION/ATTENTION LINE:

CITY & STATE:

ZIP: TAX CODE:

LOCATION	SIC CODE

CUSTOMER SEGMENT	CHAIN	ASSOCIATION	SVC P/C	PROD P/C

SALES TAX EXEMPTION NUMBER

DATE PLACED	SALES REP NO.	CUSTOMER'S P O NUMBER	☐ BLANKET	☐ TEMPORARY	CUSTOMER PHONE NO.	DATE EQPT/PROD ORDERED	SERVICE TAX	C O M.S TAX	PRODUCT TAX
7/6/19									

	DEPT	SERVICE/ PRODUCT	SERIAL NUMBER	REMARKS/UNIT PRICE	QUAN.	CHARGE	SALES TAX	TOTAL CHARGE	SOLVENT/DRUMS CLEAN	USED	USED SOLV	SK DOT	CC	SERVICE TERM	SCHEDULE DATE	PRINT CODE SEE BELOW	FREE TRIAL	NV CODE	PROMO NO	RELEASE NO.	MSDS GIVEN
1		870965	TCLP	$225	1	$225															☐
2			Metals																		☐
3			RLRA																		☐
4			$																		☐
5																					☐
6																					☐
7																					☐

TOTAL-SERVICE/PRODUCTS $225

REFUSED SERVICE EXPLAIN

* PLACEMENT CODES
(1) NEW APPLICATION
(2) REPLACE DEFECTIVE MACHINE
(3) REPLACE COMPETITIVE MACHINE
(4) REPLACE HOME MADE VAT
(5) ADDITIONAL MACHINE

USEPA TRANSPORTER 1 ID NO.	USEPA TRANSPORTER 2 ID NO.	GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.

	11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	12 CONTAINERS NO.	TYPE	13 TOTAL QUANTITY	14 UNIT WT/VOL	SK DOT NUMBER
A.						
B.						
C.						
D.						

I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES

- 0 TO 220 LBS /MONTH — INITIALS
- 220 LBS TO 2,200 LBS /MONTH — INITIALS
- GREATER THAN 2 200 LBS /MONTH — INITIALS

DESIGNATED FACILITY NAME AND ADDRESS

USA EPA ID NO.

STATE ID NO.

PAYMENT RECEIVED SECTION

CASH ☐ TOTAL RECEIVED APPLY PAYMENT TO:*

CHECK NUMBER ☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE # AMOUNT $ INVOICE # AMOUNT $

PREVIOUS CREDIT CARD NO →

CREDIT CARD NO. AMEX VISA MC EXP. DATE

CUSTOMER REFERENCE INFORMATION

MANIFEST NO.

LDR MESSAGE

MANIFEST CODE SEQ #

IN THE EVENT OF AN EMERGENCY CALL 1-800-468-1760 (24 hours)

I AGREE TO PAY THE ABOVE CHARGES AND TO BE BOUND BY THE TERMS AND CONDITIONS SET FORTH ABOVE AND ON THE REVERSE SIDE OF THIS DOCUMENT. PLEASE CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. THE INDIVIDUAL SIGNING THIS DOCUMENT IS DULY AUTHORIZED TO SIGN AND BIND CUSTOMER TO ITS TERMS.

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

GARY B SMITH
Print Customer Name

By: Gary B Smith
Customer's Authorized Representative

THIS AGREEMENT CONTINUES ON THE REVERSE SIDE

TOTAL CHARGE (FROM ABOVE)

TOTAL DUE $225.60

DO NOT WRITE IN AREA BELOW

PART NO. 1360 (Rev 05/07)