



July 28, 2021

Via E-Mail

Ms. Carrie L. Kruchell, P.G.
Professional Geologist II
Hazardous Waste Program & Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 4560
Tallahassee, FL 32399

RE: Notification and Reporting Requirements of Permit No. 0077130-010-HO, Safety-Kleen Systems, Inc., 161 Industrial Loop South, Orange Park, FL 32073. FLD980847214.

Dear Ms. Kruchell,

Per the notification and reporting requirements in the above referenced permit, Part I General and Standard Conditions #12, Safety-Kleen is notifying the Department of a non-compliance event with Part II Subpart B.2 – Specific Operating Conditions for Container Storage Units #8.

Specifically, the Safety-Kleen Systems, Inc. Orange Park facility has exceeded its' 10-day time limit on five (5) hazardous waste containers designated to other TSDFs. There are currently four (4) containers that were received on 7/14/21, one (1) container that was received on 7/16/21 over their 10-day limit. The scheduled pick up on Friday 7/23/21 was canceled at the last minute due to the driver's tractor developing a flat tire, and at this late time we were unable replace him with an internal employee or to contract a third-party transporter to perform this waste pick-up. We have been informed by our internal transportation group that the first available trailer is scheduled to arrive on Thursday, July 29, 2021 to remove all of these containers.

The main causes of non-compliance were:

1. The tractor scheduled to travel and collect containerized waste at the Safety-Kleen Orange Park, FL facility on 7/23/21 developed a flat tire en route to the branch. The driver of that tractor was operating in a tight window with regards to his USDOT hours of service, and most likely would have exceeded those hours had he waited for the repair team to arrive, fix the tire, and proceeded on to Orange Park, FL.
2. There is an industry wide back log causing major delays in the incineration market, which in turn is affecting transportation assets (trailers) and manpower (drivers). There is also a driver shortage in the transportation industry. This has lead to scheduling delays for waste shipments to downstream accumulation centers and processing facilities.

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The steps being taken to reduce, eliminate, and prevent recurrence of this non-compliance event are as follows:

1. The Safety-Kleen Orange Park facility is restricting containerized hazardous waste designated to other TSDF (10-day transfer waste) while the company works through transportation challenges facing industry.
2. Companywide, Clean Harbors and Safety-Kleen are increasing staffing and expanding shifts to increase processing capability. Clean Harbors continues to recruit additional drivers and 3rd party vendors for transportation needs.

It is important to note these containers remain under the control of Safety-Kleen while at the Orange Park facility, are being inspected daily, and stored in a secured/contained area until they are shipped off-site. Safety-Kleen is committed to compliance with all applicable regulations and permit conditions and will take all necessary steps to prevent reoccurrence. If you have any questions, or require additional information, please contact me at (561) 523-4719.

Sincerely,



Jeff Curtis
Sr. Environmental Compliance Manager
Safety-Kleen Systems, Inc.

cc: Cheryl Mitchell, FDEP Northeast District
Bonnie Bradshaw, FDEP Northeast District
Glen Perrigan, FDEP Tallahassee
Michell Smith, FDEP Tallahassee
Scott Thompson, Safety-Kleen Orange Park