



November 22, 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 thirty-one (31) hazardous waste containers designated to other TSDFs. There are currently two (2) containers that were received on 11/9/21, twelve (12) containers that were received on 11/10/21, and seventeen (17) containers that were received on 11/11/21 over their 10-day limit. The scheduled pick up on Friday 11/19/21 was canceled at the last minute due to the assigned driver calling out sick, and the replacement driver for the Lexington, SC distribution center group is out on leave due to an injury. Upon notification of this cancelation, we also reached out to the Clean Harbors Bartow, FL plant to inquire if they had any available drivers, but we were unsuccessful. We have been informed by our internal transportation group that the trailer is scheduled to arrive today Monday, November 22, 2021 to remove all of the referenced containers.

The main causes of non-compliance were:

1. The scheduled driver to travel and collect containerized waste at the Safety-Kleen Orange Park, FL facility on 11/19/21 called out sick this day. The back-up driver for this group is currently out on leave, and there were no other personnel available to perform this pick-up.
2. There is an industry wide back log causing major delays in hazardous waste disposal, 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 trying to restrict containerized hazardous waste designated to other TSDF (10-day transfer waste) while the company works through transportation challenges facing industry. In this case we had a confirmed pick-up date of 11/19/21 from the DC that was canceled due to unforeseen circumstances.
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
Jeff Gregg, FDEP Tallahassee
Michell Smith, FDEP Tallahassee
Scott Thompson, Safety-Kleen Orange Park