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July 10, 2007

Certified Mail #70051160000391238893

Ms. Janine Kraemer, CHMM
Florida Department of Environmental Protection
Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

RE: Safety-Kleen (313001) Sanford Branch Request for Information Letter

Dear Ms. Kraemer:

I am in receipt of your Request for Information Letter dated July 9, 2007. Enclosed please find a schematic of the Continued Use Return/Fill system and a list of the Safety-Kleen Sanford Branch continued use customers.

The continued use/drum washing process involves several pieces of equipment. Let me start by defining the integral parts of the system:

- **Continued Use Vessel:** This is a steel container with approximately 200 gallons of capacity that contains a tapered bottom which acts as a funnel to transfer solvent to the spray nozzle on the barrel washer inside the drum washer. There is a removable top screen at the throat of the continued use vessel to catch any solids.
- **Drum Washer:** This is a steel container which contains a barrel washer to clean the interior of drums of sludge, sediment, and residue. Similar to the continued use vessel, the drum washer acts as a funnel to transfer the used solvent into a bulk storage tank.
- **Motorized Reversing Ball Valves:** Two motorized reversing full-port ball valves are used to direct flow of solvent from either the continued use vessel or drum washer to the drum washer pump (DW). The DW pump pumps the solvent through the spray nozzle in the barrel washer to clean the drums. The ball rotates 90 degrees from the fully open position to the fully closed position by the way of an electric motor actuator. When the continued use vessel is being used, the valve in the line from the continued use vessel is open and the valve in the line from the drum washer is closed. When the drum washer is selected, the valve in the line from the continued use vessel closes and the valve in the line from the drum washer opens.
- **Continued Use Control Panel:** This electric control is identified on the schematic as Solvent Use Selector Switch (S). It has a three-position switch to energize the two motorized reversing ball valves which control the flow of solvent from the

SAFETY-KLEEN CORP.

5610 ALPHA DRIVE BOYNTON BEACH, FL 33426



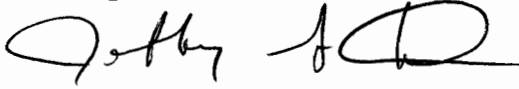
drum washer or continued use vessel through the DW pump and barrel washer spray nozzle. When in the off position both valves are de-energized. It also has valve position indicator lights, one green (open) and one red (closed) for each valve. When the switch is in the "Barrel Wash" position, the top left green light is lit, indicating the valve from the drum washer is open, and the lower right red light is lit, indicating the valve from the continued use vessel is closed. When the switch is turned to the "Reuse Solvent" position, the upper right green light will come on after the valve in the line from the continued use vessel opens and the lower left red light will come on after the valve in the line from drum washer closes.

The drum washing procedure takes place as follows: Containers of continued use solvent and hazardous waste solvent are offloaded by material handlers from the route trucks onto the return and fill dock. Continued use solvent containers will be emptied into the Continued Use Vessel and hazardous waste solvent containers will be emptied into the Drum Washers. When there is sufficient continued use solvent in the Continued Use Vessel to clean drums the material handler will go to the Continued Use Control Panel and turn the switch to "Reuse Solvent". This action energizes the two motorized reversing ball valves which control the flow of solvent from either the Continued Use Vessel or the Drum Washer to the DW pump. The valve in the line from the Continued Use Vessel opens and the valve in the line from the Drum Washer closes. The DW pump will then pump the continued use solvent to the spray nozzle on the barrel washer, which is inside the Drum Washer. The barrel washer is preset to run for 35-45 seconds so as to deliver 13 gallons through the spray nozzle. After cleaning the drum the continued use solvent collects in the bottom of the Drum Washer where it is then pumped to the bulk hazardous waste storage tank via the used mineral spirits (UMS) pump. When the Continued Use Vessel has been drawn down to a level of 15 gallons or less the material handlers will use hazardous waste solvent for drum washing. Hazardous waste solvent containers are emptied directly into the Drum Washer. The material handler will turn the switch on the Continued Use Control Panel to "Barrel Wash". This action opens the valve in the line from the Drum Washer and closes the valve in the line from the Continued Use Vessel. The hazardous waste solvent then flows to the DW pump and is directed to the spray nozzle on the barrel washer for drum cleaning. It then collects at the bottom of the Drum Washer and is pumped to the bulk hazardous waste storage via the UMS pump.

The system as it was designed to operate and constructed does not contain any backflow prevention devices. During the Department's inspection it was learned that we had backflow of material into the Continued Use Vessel due to a faulty valve. However, the continued use solvent and resulting mixture from the backflow was used for drum cleaning and at no time was any continued use solvent disposed of through the system without being used for its' intended use, which is drum cleaning. A new valve was ordered and is scheduled to be installed on Friday, July 13, 2007.

If you should require more information or have any questions regarding this submission feel free to contact me at (561) 523-4719.

Best regards,

A handwritten signature in black ink, appearing to read "Jeff Curtis". The signature is fluid and cursive, with the first name "Jeff" written in a larger, more prominent script than the last name "Curtis".

Jeff Curtis
EHS Manager
Safety-Kleen Systems, Inc.

Enclosure(s): Continued Use Return/Fill Schematic
Safety-Kleen Sanford Branch Continued Use Customer List

CONTINUED USE

R/F SCHEMATIC

